



**COMMENT RESPONSE DOCUMENT (CRD)
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2011-20 (B.II)**

***'Authority, Organisation and Operations Requirements for
Aerodromes'***

(B.II) CRD to NPA 2011-20 (B.II) – AMC & GM

IV. CRD table of comments, responses and resulting text

(General Comments)	-
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comment	9	comment by: <i>ACI EUROPE - Airports Council International</i>
		Local legislation should be considered as arrangements.
response	Noted	
		The Basic Regulation in its Essential Requirements is clear on the matter of arrangements: 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety' So, to the extent that there is no such arrangement, between the aerodrome operator itself and the other parties, the EU law is not respected. Such arrangements are meant to contain and solve issues, like who does what, how, how often, what if cases, and similar such matters. For the above reasons, local legislation cannot count as arrangements.
comment	10	comment by: <i>ACI EUROPE - Airports Council International</i>
		The principle of the BR to be proportionate to the size, traffic, category and complexity of the aerodrome and nature as well as the volume of operations thereon. (Art. 8a (6) (b) should be reflected in the Regulation.
response	Noted	
		The Agency feels that it has respected the Basic Regulation principles for proportionality, and that it has taken account of the variations in airport infrastructure in the Community.
comment	21	comment by: <i>ACI EUROPE - Airports Council International</i>
		Check headings and layout in pages 109 -113
response	Accepted	
comment	43	comment by: <i>ACI EUROPE - Airports Council International</i>
		There is a need for a consistent numbering process for all tables and figures as well as their references. For example, AMC2.ADR.OPS.B.075.
response	Noted	
		Numbering has been corrected.
comment	44	comment by: <i>ACI EUROPE - Airports Council International</i>
		Within the EU a lot of effort has been put in place to reduce the

	<p>administrative load enforced by governments. The detailed descriptions and amendments in these EASA requirements will decrease, but increase the administrative workload and administrative costs. Therefore we suggest to make the Implementing Rules less detailed and more like a framework and transfer many AMCs and CS into Guidance Material.</p>
response	<p>Partially accepted</p> <p>This review process has taken place in what concerns IRs, AMCs and CSs. The Agency extensively reviewed its approach to notifications from the competent authorities to the Agency. Where possible, it deleted these notifications or made them information requirements.</p>
comment	<p>63 comment by: <i>Amsterdam Airport Schiphol - AMS/EHAM (and D.A.A)</i></p> <p>Amsterdam Airport Schiphol and Dutch Aerodromes Association (NVL) fully support the comment and justification as submitted by ACI Europe. In addition to that, Amsterdam Airport Schiphol and Dutch Aerodromes Association (NVL) have submitted extra comments in this CRT .</p>
response	<p>Noted</p>
comment	<p>158 comment by: <i>Swedavia AB - Swedish airports (currently 11 airports)</i></p> <p>Within these requirements the responsibility of the aerodrome operator is significantly increased. More and more issues are brought under the responsibility of the aerodrome operators.</p> <p>Within the EU a lot of effort has been put in place to reduce the administrative load enforced by governments. The detailed descriptions will increase the administrative workload and administrative costs. Therefore we suggest to make the Implementing Rules less detailed and more like a framework and transfer many AMCs and CS into Guidance Material.</p> <p>There is a need for a consistent numbering process for all tables and figures as well as their references.</p> <p>The structure of the rules and cross references makes the documents complex to read and understand. In ADR.OR.E.005 operators are required to observe human factors principles and organise their aerodrome manuals in a manner that facilitates preparation, use and review. It would be advantageous, if the EASA documents would follow these principles.</p> <p>The provisions for flexibility, customised compliance and proportionality given under the existing ICAO system, are not satisfactorily reflected in the NPA documents. It is notable due to the fact that recommendations have been transposed to the same level as standards.</p> <p>We urge EASA to make consistency checks with regards to the usage of the contents of ICAO State Letter 41 and ensure that only SARPS which are published are used in establishing EASA documentation.</p> <p>Local legislation should be considered as arrangements.</p> <p>The principle of the BR to be proportionate to the size, traffic, category and complexity of the aerodrome and nature as well as the volume of operations thereon (Art. 8a (6) (b) should be reflected in the Regulation.</p>
response	<p>Noted</p>

Aerodrome operator responsibilities: The Basic Regulation attributed a number of responsibilities to aerodrome operator (Essential Requirements Part B). However, the Agency has developed an Implementing Rule in Annex III to handle situations where such responsibility lies not directly with the aerodrome operator (ADR.OPS.B.001).

Administrative burden: Partially accepted. This review process has taken place in what concerns IRs, AMCs and CSs. The Agency extensively reviewed its approach to notifications from the competent authorities to the Agency. Where possible, it deleted these notifications or made them information requirements.

Numbering: Numbering and references have been corrected.

Structure: Noted.

Flexibility, customised compliance and proportionality: Noted. The Agency feels that it has respected the Basic Regulation principles for proportionality, better regulation, customised compliance and has taken account of the variations in airport infrastructure in the Community. Flexibility at the AMC/CS level is for all requirements given by installation of alternative means of compliance, ELoS, and Special Condition, regardless its status on ICAO level. This issue is further explained in the Explanatory Note.

ICAO SL 41: Concerning the adoption of the proposals included in ICAO SL 41-2011, the Agency decided not to follow them for the time being.

Local legislation: The Basic Regulation in its Essential Requirements is clear on the matter of arrangements:

'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety'

So, to the extent that there is no such arrangement, between the aerodrome operator itself and the other parties, the EU law is not respected. Such arrangements are meant to contain and solve issues, like who does what, how, how often, what if cases, and similar such matters. For the above reasons local legislation cannot count as arrangements.

comment

180

comment by: *SWISS AERODROMES ASSOCIATION*

This part of the NPA contains AMCs that are very detailed, sometimes in an excessive manner (AMC1-ADR.AR.C.060a for instance). Smaller aerodromes do not have to be exposed to such detailed and burdensome "means of compliance" which, worded with "should", have an undesirable constraining effect.

This degree of detail is not necessary as the CB of each individual aerodrome anyway has to comply with the BRs and ERs!

Knowing the limited degree of freedom granted by the status of an AMC (s. explanatory note, page 7, para 16, showing the workload and limited frame of so called "AltMoC"), the whole book has do undergo a review in order to reflect the degree of flexibility and customized compliance

required by the BR.

In the process of commenting this part of the NPA, we shall not address every individual issue but only give some illustrations of the enhancement potential. This means that the general trend for lighter regulation should also apply to provisions which are not expressly commented: in other words: as far as acceptable level of flexibility and potential of customized compliance is not ensured to enable future operations of existing airports without additional burden or restrictions, non commented provisions must not be considered as silently agreed with by our Association and its members.

The aim of such a review must be a) to classify as GM most of the AMCs and b) limit to a reasonable level the degree of detail of AMCs that might be necessary as such. The wording "should" in this context has also to be rediscussed as it implies more than just guidance and does not take into account the type of traffic because of its general applicability.

The sensitivity to requirements is not the same at regional airports or at large hubs. It is also related to the type of traffic on the aerodrome. We therefore ask EASA for representatives of the regional airports community to be associated to the revision work to be initiated after the consultation process.

response

Noted

ADR.AR.C.060: ADR.AR.C.060 was abolished.

Flexibility and customised compliance: The Agency feels that it has respected the Basic Regulation principles for proportionality, better regulation, customised compliance and has taken account of the variations in airport infrastructure in the Community.

The issue of the rules being binding, as well as the use of 'shall' and 'should' raised here, are explained in the Explanatory Note.

comment

334

comment by: *Avinor*

Local legislation should be considered as "arrangements" in documents.

The principle of the BR to be proportionate to the size, traffic, category and complexity of the aerodrome and nature as well as the volume of operations thereon. (Art. 8a (6) (b) should be reflected in the Regulation.

response

Noted

Local legislation: The Basic Regulation in its Essential Requirements is clear on the matter of arrangements:

'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety'

So, to the extent that there is no such arrangement, between the aerodrome operator itself and the other parties, the EU law is not

respected. Such arrangements are meant to contain and solve issues, like who does what, how, how often, what if cases, and similar such matters. For the above reasons local legislation cannot count as arrangements.

Proportionality: The Agency feels that it has respected the Basic Regulation principles for proportionality and has taken account of the variations in airport infrastructure in the Community.

comment

581

comment by: *Estonian CAA*

Local legislation should be considered as arrangements

The principle of the BR to be proportionate to the size, traffic, category and complexity of the aerodrome and nature as well as the volume of operations thereon. (Art. 8a (6) (b) should be reflected in the Regulation.

response

Noted

Local legislation: The Basic Regulation in its Essential Requirements is clear on the matter of arrangements:

'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety'

So, to the extent that there is no such arrangement, between the aerodrome operator itself and the other parties, the EU law is not respected. Such arrangements are meant to contain and solve issues, like who does what, how, how often, what if cases, and similar such matters. For the above reasons local legislation cannot count as arrangements.

Proportionality: The Agency feels that it has respected the Basic Regulation principles for proportionality and has taken account of the variations in airport infrastructure in the Community.

comment

583

comment by: *ADV -German Airports Association*

Attachments [#1](#) [#2](#) [#3](#) [#4](#)

Comments on ADR.AR

- see B.I 3386-3392

Comments on ADR.OR

- Comments on ADR.OR Part I
- see B.I 3356 – 3369
- see B.II 2527 – 2538
- Comments on ADR.OR Part II

	<ul style="list-style-type: none"> • see B.I 3354 - 3355 • see B.II 2519 - 2526 <p>Comments on ADR.OPS</p> <ul style="list-style-type: none"> • see B.I 3400 - 3412 • see B.II 2558 - 2579
response	<p>Noted</p> <p>Answers are given in the relevant sections.</p>

comment	<p>621 comment by: <i>Union des Aéroports français - UAF</i></p> <p>Attachment #5</p> <p>See comment B.I 765</p> <table border="0"> <tr> <td>UAF</td> <td>NPA</td> <td>2011-20</td> <td>(B.I-III)</td> <td>Com</td> <td>gal</td> <td>1</td> </tr> <tr> <td>Objet</td> <td>et</td> <td>portée</td> <td>du</td> <td>règlement</td> <td></td> <td></td> </tr> <tr> <td>Traduction</td> <td></td> <td>de</td> <td></td> <td>courtoisie</td> <td></td> <td></td> </tr> </table> <p>There is a doubt about the object and the scope of the EASA regulation on aerodromes, issue of the present NPA.</p> <ul style="list-style-type: none"> • Does this regulation create obligations towards other entities than the competent authority and the aerodrome operator such as local authorities or owners outside of the airport boundaries? • Does the regulation creates rights for users of the airport and enables them to introduce court claims on this basis? <p>Besides, the legal applicability of others documents prepared by the EASA is uncertain. In its explanatory note (paragraph 16), the agency indicates that AMCs are non-essential and non-biding whereas the ADR.OR.A.015 is in contradiction with this affirmation: "<i>The aerodrome operator may implement these alternative means of compliance subject to prior approval by the competent authority and upon receipt of the notification</i>". This must imperatively be clarified because all comments on AMC are largely related to their juridical value. UAF considers that EASA's regulation should only be related to the certification of aerodromes. This position is confirmed by the fact that every specification of the NPA have been provided only in the scope of an aerodrome certification.</p> <p>To this end, UAF is in favour of a better delimitation of the regulation object at article 1 of cover regulation. Without such precision, the regulation would interfere with other activities which are note in the scope of competence of the EASA notably concerning ground handling, urbanism and public security.</p>	UAF	NPA	2011-20	(B.I-III)	Com	gal	1	Objet	et	portée	du	règlement			Traduction		de		courtoisie		
UAF	NPA	2011-20	(B.I-III)	Com	gal	1																
Objet	et	portée	du	règlement																		
Traduction		de		courtoisie																		
response	<p>Noted</p>																					

comment	<p>622 comment by: <i>Union des Aéroports français - UAF</i></p>
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Attachment [#6](#)

See comment B.I 770

UAF NPA 2011-20 (B.I-III) Com gal 2

Responsabilité de l'exploitant

Traduction de courtoisie

The EASA regulation increases significantly the responsibility of the aerodrome operator compared to the existing situation in France. More and more missions have been put under the responsibility of aerodrome operator.

The rulemaking rationale should lead to counter balance this increase of responsibilities by conferring the necessary powers to the aerodrome operator in order to assume his new responsibilities. But the EASA regulation cannot confer such powers to the operator. Indeed, the repartition of responsibilities in member States is, in some cases, conducted under constitutional rules, for example when they are affected to public authorities, is largely out of the scope of the EASA. Moreover, some provisions relating to the missions of the aerodrome operator do not take into account the principles of subsidiarity and proportionality. The safety of air transport must be assured without altering the repartition of the missions in member States. Each member States must have the possibility to designate authorities or entities in charge of the missions mentioned in the regulation notably concerning the obligation outside of the airport perimeter.

In others cases, the maintaining of competencies of public authorities is fixed by EU requirements. It is for example the case with the Directive (modified) n° 96/67/ CE dated 15 October 1996 related to the ground handling. Article 14 of this directive indicates that if the activity of a ground handler might be dependent on safety conditions of aircraft, equipment and persons, such conditions shall be defined and implemented by a public authority independent of the aerodrome operator through an agreement process. Consequently, the aerodrome operator has no power to forbid the access of a ground handler at the airport or to suspend this access for reasons related to safety. The draft of the future regulation to replace this directive does not modify this aspect (article 16 of the draft dated 16/03/2012).

Consequently, UAF suggests to insert a new article between article 2 and article 3 of the cover regulation :

Article 2 bis: "competent authorities"

Points 1 and 2 of article 3 of the cover regulation (« 1. Member States shall designate [...] No 216/2008. ») must be integrated in this new article 2 bis because they are the first rules about competent authority apart from the scope of monitoring, stricto sensu. These paragraphs are completed with the addition of the following paragraph: "When the responsibilities mentioned in the annexes of this regulation are assumed by an entity which is independent from the aerodrome operator, the competent authority shall ensure that all the essential requirements are covered and shall describe the allocation of these responsibilities in the approval terms of the certificate."

response Noted

comment 623 comment by: *Union des Aéroports français - UAF*

Attachment [#7](#)

	see Comment B.I 771
UAF	NPA 2011-20 (B.I-III) Com gal 3
	Nombre de spécifications de certification (CS) et de moyens acceptables de conformité (AMC)
	Traduction de courtoisie
	Many efforts have been undertaken in the European Union to reduce the administrative burden. But the text of the NPA contains a great volume of very specific rules. These provisions will considerably increase administrative burdens and costs. Consequently, we strongly suggest on one hand to have Implementing rules (IR) less precise and to rather describe a general framework and on the on the hand to transfer many AMC and CS into guidance material (GM). Many texts should be considered as examples to follow instead of being solutions indifferently imposed to anybody, it is even more valid knowing that many of them have no direct effects on safety.
response	Noted

comment	624 comment by: <i>Union des Aéroports français - UAF</i>
	Attachment #8
	see Comment B.I 772
UAF	NPA 2011-20 (B.I-III) Com gal 4
	Modification de l'annexe 14 de l'OACI
	Traduction de courtoisie
	UAF appreciates the spirit of cooperation shown by EASA during the NPA process. EASA has tried to find solutions for flexibility. However, this effort is still not sufficient because the results lead to a loss of flexibility in comparison with the ICAO system. It is notably due to the fact that EASA takes up indistinctly ICAO standards and ICAO recommendations. UAF strongly wish that EASA deals with ICAO recommendations and ICAO standards with different manners to keep the flexibility of ICAO system. So UAF proposes that EASA takes as principle to consider ICAO recommendations as good practices only and transpose them into GM. UAF admits that, after use of this principle, some ICAO recommendations (few) could be CS or AMC, for example the recommendation related to the runway width. Moreover NPA reflects very partially and incompletely, the annex 14 modifications proposed by ICAO in its State letter n°41. These modifications have already been validated by the ICAO Air Navigation Commission
	19/04/2012 UAF NPA 2011-20 (B.I-III) Com gal 4Fi Page 2 sur 2 and many ICAO experts. It is planned that these modifications would be applicable before the entry into force of EASA regulation. UAF urges EASA to take up the contents of ICAO State Letter 41, also to anticipate the future ICAO annex 14, which will be more based on objectives or performances to reach than prescriptive rules. Such anticipation will prevent Europe from facing an obsolete regulation from its publication.

UAF reminds that Annex 14 has been thought out in the middle of the last century for airport design when there was still space around. Nowadays, the paradigm has changed because rules should be thought for aerodrome certification in an optimisation of space and resources. Existing annex 14 SARPS reflect very incompletely this new paradigm. N.B.: in several comments about CS and AMC, UAF indicates that it is appropriate to transfer the CS or AMC into GM. Such transfer needs to rewrite the text so that the term "should" does not appear anymore. Indeed, this term should be used only for CS and AMC in the present regulation.

response Noted

comment 626 comment by: *Union des Aéroports français - UAF*

Attachment [#9](#)

See comment B.I 773

UAF NPA 2011-20 (B.I-III) Com gal 5

Forme

Traduction de courtoisie
 The structure of the rules and cross references makes the document complex to read and understand.

response Accepted

comment 627 comment by: *Union des Aéroports français - UAF*

Attachment [#10](#)

see comment B.I 774

UAF NPA 2011-20 (B.I-III) Com gal 6

Arrangements

Traduction de courtoisie
 In different member States including France, public authorities have an essential role concerning airport safety and are in charge of specific powers to this end. In France the constitutional framework implies that some missions are assumed by a public authority such as the "préfets" who are in charge and have the power to enforce law and order on the aerodromes and also outside the aerodromes whether it is for the definition or the application of the rules.

With the EASA projects, these missions will not be affected to the public authority anymore but to the aerodrome operator by the way of arrangements between itself and others entities providing services at the airport (MET, security, airlines...)

In order to facilitate the implementation of the future regulation, UAF suggests that every rule taken by a public authority, including rules adopted by the "préfets" must be considered as arrangements and this must be written in the EASA project.

response

Noted

comment

628

comment by: *Union des Aéroports français - UAF*

Attachment [#11](#)

See Comment B.I 775

UAF NPA 2011-20 (B.I-III) Com gal 7

Langue

Traduction de courtoisie
 UAF draw the attention of EASA on the fact that its futures rules shall be understood by all the actors, who have to use them. Consequently, these rules shall be written in the national language of the State and not only in English.

§2.2.2 of the « Regulatory Impact Assessment » (page 15/130) giving the number of French airports entering the scope of the future EASA rules indicate that many of them are French: "Looking at the result for individual Member States, France has two peculiarities in this European picture : it has the largest number of aerodromes (159) and it is also the country with the highest number of aerodromes below the BR threshold (72 i.e. in relative share 45%...[...]" French airports are so particularly interested to know, understand and appreciate the impact of the EASA rules of this NPA.

The consultation, only in English, does not allow to French airports operators, having no sufficient translation means, to know, understand and correctly appreciate the impact of the rules proposed in this NPA. Consequently, French aerodrome operators are not able to use all their rights, which are recognized by article 6.1 of the "rulemaking procedure", applicable for the redaction and the publication of NPA: "Any person or organisation with an interest in the rule under development shall be entitled to comment on the basis of the published NPA, without discrimination on the basis of nationality".

Article 32-2 of the basic regulation (CE N°216/2008) indicates that all the translation works required for the EASA functioning are performed by the translation center of the EU.

It is also in line with ADR.OR.E.005 (i) related to the aerodrome manual. Indeed, it is indicated that the aerodrome manual shall reflect the basis certification and shall be in a language acceptable by the competent authority and understandable by everyone, who has to use it. So, IR-OPS, AMC and CS, elements of the certification basis shall be written in the official language recognized by the Member State.

Besides, this requirement of the use of the official language appears in most of national constitutions.

In consequence, the EASA regulation shall be written in French to be correctly applied on French aerodromes.

It is why, UAF ask EASA to answer to the following questions.

1. How the fact to have no French version of EASA rules could be considered as compliant with article 58-2 of the basic regulation on transparency and communication ? This article indicates that the agency ensure the public and any interested party are rapidly given objective, reliable and easily understandable information with regard to its.

2. How the fact to have no French version of EASA rules could be considered as compliant with the « Rulemaking Procedure » applicable for

the redaction and publication of the NPA (§2 Explanatory Note page 5/22)
 ? This « Rulemaking Procedure » is the subject of the EASA Management Board Decision 08-2007 –Decision amending and replacing the Rulemaking Procedure – MB Meeting 03-2007- in application of article 52 of the basic regulation. In particular, How the fact to have no French version of EASA rules could be considered as compliant with article 6-1 of the EASA Rulemaking Procedure and article 52-1-c) of the basic regulation (“the procedures ensure ensure that the Agency publishes documents and consults widely with interested parties...”).

3. How the fact to have no French version of EASA rules could be considered as compliant with the article 22 of the Charter of fundamental rights of the European Union (2010/C 83/02) which stipulates that the European Union respects the linguistic diversity?

4. How the fact to have no French version of EASA rules could be considered as compliant with the interdiction of discrimination due to the nationality as stipulated in article 18 of the Treaty on the functioning of European Union?

5. How the fact to have no French version of EASA rules could be considered as compliant with article 342 of the Treaty on the functioning of European Union (former article 290) et of the regulation n°1 (modified) governing the languages of the European Union (in particular articles 1, 2 et 4)? These articles give the list of the official languages and the work languages of the EU institutions, including French among others. They also indicate that the r delivered by the EU institutions to a member State or at a citizen of this Member State shall be in the official language of this State and that the general texts are written in official languages.

6.If the answers to the here above questions would not be satisfactory vis-à-vis the applicable rules, how EASA plans to correct the NPA process used and to proceed for the publication of its set of rules ?

response

Noted

comment

629 comment by: *Union des Aéroports français - UAF*
 Attachment [#12](#)
 See comment B.I 776
 UAF NPA 2011-20 (B.I-II) Com gal 8
 Respect du règlement de base
 Traduction de courtoisie
 The principle of the basic regulation to be proportionate to the size, the traffic, the category and the complexity of the aerodrome is not really reflected in the regulation.

response

Noted

comment

999 comment by: *Cologne/Bonn Airport*
 General Comments on ADR-OPS:

- References to ICAO Documents within tables, figures and text need to be removed or aligned with EASA references.
- Numeration of Figures and tables needs to be consistent

	<ul style="list-style-type: none"> • Repeating paragraphs with the same content need to be removed (e.g. DSN.H.425 (f),(g),(h) or DSN.M.760 (c)) • No proposed Amendments to ICAO Documents should be included into EASA as long as there not finally agreed by ICAO. • Within these requirements the responsibility of the aerodrome operator is significantly increased. More and more issue are brought under the responsibility of the aerodrome operators without responsible authorities. This heavily conflicts with national law.
response	<p>Noted</p> <p>Numbering: Numbering, references, and duplications have been corrected.</p> <p>ICAO SL 41: Concerning the adoption of the proposals included in ICAO SL 41-2011 the Agency decided not to follow them for the time being.</p> <p>Aerodrome operator responsibilities: The Basic Regulation attributed a number of responsibilities to aerodrome operator (Essential Requirements Part B). However, the Agency has developed an Implementing Rule in Annex III to handle situations where such responsibility lies not directly with the aerodrome operator (ADR.OPS.B.001).</p>
comment	<p>1264 comment by: <i>ADP : Aeroports de Paris</i></p> <p>ADP (Aéroports de Paris) fully support the comments and justification as submitted by ACI Europe. In addition to those, ADP has submitted his own comments, more specifically for France and the Paris airports.</p>
response	<p>Noted</p>
comment	<p>1293 comment by: <i>Assaeroporti - Associazione Italiana Gestori Aeroporti</i></p> <p>ASSAEROPORTI fully supports the comments and justifications as submitted by ACI Europe. In addition to that, ASSAEROPORTI has submitted futher comments in this CRT.</p> <p>In particular, based on the italian regulation, some competencies and activities are on charge of third parties (i.e. Rescue and Fire Fighting or Air Navigation Service). For this reason local legislations should be considered as arrangements or agreements.</p> <p>However the EASA regulation increases significantly the responsibility of the aerodrome operator compared to the existing situation in Italy. Consequently, we suggest to insert a reference to "competent authorities" in order to ensure their responsibilities in the certification process.</p>
response	<p>Noted</p>
comment	<p>1294 comment by: <i>Turin Airport - TRN/LIMF</i></p> <p>Turin Airport fully supports the comments and justifications as submitted</p>

by ACI Europe. In addition to that, together with ASSAEROPORTI we have submitted further comments in this CRT.
 In particular, considering the Italian regulation, some competences and activities are on charge of other parties (i.e. RFF or ANS). For this reason Local legislation should be considered as arrangements.

However the EASA regulation increases significantly the responsibility of the aerodrome operator compared to the existing situation in Italy. Consequently, we suggest to insert a reference to "competent authorities" in order to ensure their responsibilities in the certification process.

response Noted

comment **1605** comment by: *CAA Norway*

Several GM in OPS has the contradictory wording "may include at least", which seems strange for a guidance text. Suggest to change to "**may include, but not limited to...**"

response Accepted

The wording has been changed.

comment **1657** comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#13](#)

See Comment B.I 3563

ADBM - NPA 2011-20 (B.I-II) Com gal 8

Respect du règlement de base

Traduction de courtoisie

The principle of the basic regulation to be proportionate to the size, the traffic, the category and the complexity of the aerodrome is not really reflected in the regulation.

response Noted

The Agency feels that it has respected the Basic Regulation principles for proportionality and has taken account of the variations in airport infrastructure in the Community.

comment **1680** comment by: *Aéroport de Marseille - MRS/LFML*

The principle of the basic regulation to be proportionate to the size, the traffic, the category and the complexity of the aerodrome is not really reflected in the regulation.

response *Noted*

The Agency feels that it has respected the Basic Regulation principles for proportionality and has taken account of the variations in airport infrastructure in the Community.

comment	1754	comment by: AIRBUS
	The word "shall" is used in several AMCs and GMs. Instead of, please use the word "should" for AMCs as indicated in the Explanatory Note (point 18.). For GMs, we suggest to use "may" or "is".	
response	Accepted The word 'shall' has been removed from AMC/GM.	
comment	1773	comment by: AESA - Agencia Estatal de Seguridad Aérea
	EASA should check the code of the titles because there are a lot of mistakes and incoherences, amongst others: There are two AMC1-ADR.C.015 (a); There is one GM2-ADR.AR.C.010 without previous GM1-ADR.AR.C.010; There is AMC1.ADR.AR.C.035 (a)(3) and there isn't ADR.AR.C.035(a) There is GM3-ADR.OR.D.025 without previous GM2-ADR.OR.D.025;	
response	Accepted Titles have been reviewed.	
comment	1789	comment by: Pau Pyrénées Airport - PUF/LFBP
	<u>Respect du règlement de base</u> <u>Commentaire</u> Les dispositions du règlement de base relatives à la proportionnalité des mesures par rapport à la taille, au trafic, à la catégorie et à la complexité de l'aérodrome, ne sont pas réellement transcrites dans le règlement. Elles sont cependant fondamentales. Les nombreux aéroports européens de moins de 1.5 millions de passagers qui n'atteignent pas le grand équilibre, qui ne sont pas auto-suffisants et qui ne pourront pas prendre en charge toutes les missions nouvelles doivent être préservés dans leur rôle indispensable d'outils d'aménagement du territoire et de développement économique de nos régions. <u>Traduction de courtoisie</u> The principle of the basic regulation to be proportionate to the size, the traffic, the category and the complexity of the aerodrome is not really reflected in the regulation.	
response	Noted The Agency feels that it has respected the Basic Regulation principles for proportionality and has taken account of the variations in airport infrastructure in the Community.	
comment	1790	comment by: DGAC Direction Générale de l'aviation civile

Editorial comment

A guidance material only aims at describing the application of the rule or of an AMC in more detail. A guidance material provides descriptions or useful information but can absolutely not provide prescriptions, which is the goal of the rules and acceptable means of compliance. Thus, to avoid any confusion between the rules and the guides, DGAC considers that the use of the words "shall" and "should" is meant respectively to the rules and acceptable means of compliance.
 As a consequence, guidance materials using these words should be revised to use the word "may" instead.

response Noted

comment *1791* comment by: *AIRBUS*

Most aerodromes will have a national certificate before the EASA rules come into force. One of the focus in the future will be to convert as smoothly as possible, using ELoS, SC or DAAD.
 The Regulatory Impact Assessment provides several case studies for deviation and conversion process. However, more details should be provided in the AMC regarding the actions / measures / rules for the competent Authority and aerodrome operators.

response Noted

comment *1821* comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#14](#)
 See Comment B.I 3584

UAF	NPA	2011-20	(B.I-II)	Com	gal	8
Respect		du	règlement		de	base
Traduction				de		courtoisie

The principle of the basic regulation to be proportionate to the size, the traffic, the category and the complexity of the aerodrome is not really reflected in the regulation.

response Noted

The Agency feels that it has respected the Basic Regulation principles for proportionality and has taken account of the variations in airport infrastructure in the Community.

comment *1849* comment by: *Assaeroporti - Associazione Italiana Gestori Aeroporti*

The provisions for flexibility, customised compliance and proportionality given under the existing ICAO system, are not satisfactorily reflected in the NPA documents. It is notably due to the fact that recommendations

	have been transposed to the same level as standards.
response	<p>Noted</p> <p>The Agency feels that it has respected the Basic Regulation principles for proportionality, better regulation, customised compliance and has taken account of the variations in airport infrastructure in the Community. Flexibility at the AMC/CS level is for all requirements given by installation of Alternative means of compliance, ELoS, and Special Condition, regardless of its status on ICAO level. This issue is further explained in the Explanatory Note.</p>
comment	<p>1888 comment by: ADP : Aeroports de Paris</p> <p>Commentaire</p> <p>La rédaction du règlement de l'AESA et des autres documents soumis à consultation ne permet pas de déterminer avec certitude l'objet et la portée juridique de ces textes.</p> <p>En effet il n'est pas possible de savoir si le règlement :</p> <ul style="list-style-type: none">- d'une part crée des obligations pour d'autres personnes que l'autorité compétente et l'exploitant d'aérodrome ainsi que leurs préposés, par exemple des collectivités locales ou des propriétaires à l'extérieur du périmètre aéroportuaire,- d'autre part si le règlement est créateur de droits au profit des usagers qui pourraient engager des recours sur la base de celui-ci. <p>Par ailleurs, la portée juridique des autres documents préparés par l'AESA demeure incertaine. Ainsi, dans sa notice explicative (paragraphe 16), l'Agence indique que les moyens acceptables de conformité (AMC) ne sont pas essentiel (<i>non-essential</i>) et ne sont pas contraignants (<i>non-binding</i>). Or, la rédaction de l'ADR.OR.015 est en contradiction avec cette affirmation : l'exploitant d'aérodrome ne peut s'écarter d'un AMC, au moyen d'un moyen alternatif de conformité, que sur autorisation expresse de l'autorité compétente. Ce sujet doit impérativement être clarifié car les commentaires qui peuvent être fait sur les AMC dépendent en très grande partie de leur portée juridique.</p> <p>ADP (Aéroports de Paris) considère que la réglementation de l'AESA ne devrait concerner que la certification des aérodromes. Pour cela, elle s'appuie sur le fait que toutes les spécifications de la NPA ne sont prévues que dans un cadre de certification de l'aérodrome.</p> <p>ADP est donc favorable à ce que l'objet de la réglementation soit mieux délimité par l'article 1er du règlement d'exécution ("<i>cover regulation</i>"). A défaut d'une telle précision, le règlement de l'AESA viendrait interférer avec d'autres domaines échappant au domaine de compétences de l'AESA, notamment relatives à l'assistance en escale, aux règles d'urbanisme ou à la sécurité civile.</p> <p>Traduction de courtoisie</p> <p>There is a doubt about the object and the scope of the EASA regulation on aerodromes, issue of the present NPA.</p> <ul style="list-style-type: none">- Does this regulation create obligations towards other entities than the competent authority and the aerodrome operator such as local

authorities or owners outside of the airport boundaries?
 - Does the regulation creates rights for users of the airport and enables them to introduce court claims on this basis?

Besides, the legal applicability of others documents prepared by the EASA is uncertain. In its explanatory note (paragraph 16), the agency indicates that AMCs are non-essential and non-biding whereas the ADR.OR.A.015 is in contradiction with this affirmation: "*The aerodrome operator may implement these alternative means of compliance subject to prior approval by the competent authority and upon receipt of the notification*". This must imperatively be clarified because all comments on AMC are largely related to their juridical value.

ADP considers that EASA's regulation should only be related to the certification of aerodromes. This position is confirmed by the fact that every specification of the NPA have been provided only in the scope of an aerodrome certification.

To this end, ADP is in favour of a better delimitation of the regulation object at article 1 of cover regulation. Without such precision, the regulation would interfere with other activities which are note in the scope of competence of the EASA notably concerning ground handling, urbanism and public security.

response

Noted

comment

1893

comment by: ADP : Aeroports de Paris

Commentaire

A l'intérieur de l'Union européenne, beaucoup d'efforts ont été entrepris pour réduire la charge administrative.

Or, le texte de la présente NPA comporte un nombre colossal de règles très précises.

Les descriptions et amendements détaillés dans ces exigences de l'AESA vont accroître la charge administrative et les coûts administratifs.

En conséquence, ADP (Aéroports de Paris) suggère fortement que les règles d'application (IR) soient moins détaillées, qu'elles soient conçues pour fixer un cadre général et que beaucoup d'AMC et de CS soient transférés en éléments informatifs (GM). Ainsi, de nombreux textes doivent plutôt être considérés comme des exemples à suivre et non comme des solutions imposées indifféremment à tous, d'autant que beaucoup d'entre eux n'ont pas d'effets directs sur la sécurité.

Traduction de courtoisie

Many efforts have been undertaken in the European Union to reduce the administrative burden. But the text of the NPA contains a great volume of very specific rules. These provisions will considerably increase administrative burdens and costs.

Consequently, ADP strongly suggest on one hand to have Implementing rules (IR) less precise and to rather describe a general framework and on the on the hand to transfer many AMC and CS into guidance material (GM). Many texts should be considered as examples to follow instead of being solutions indifferently imposed to anybody, it is even more valid knowing that many of them have no direct effects on safety.

response

Partially accepted

On the side of the IRs, AMC, as well as CS, this review process has taken place. The Agency extensively reviewed its approach to notifications from the competent authorities to the Agency, and where possible deleted them or made them into an information requirement.

comment

1966

comment by: *Turin Airport - TRN/LIMF*

The provisions for flexibility, customised compliance and proportionality given under the existing ICAO system, are not satisfactorily reflected in the NPA documents. It is notably due to the fact that recommendations have been transposed to the same level as standards.

response

Noted

The Agency feels that it has respected the Basic Regulation principles for proportionality, better regulation, customised compliance and has taken account of the variations in airport infrastructure in the Community. Flexibility at the AMC/CS level is for all requirements given by installation of Alternative means of compliance, ELoS and Special Condition, regardless of its status on ICAO level. This issue is further explained in the Explanatory Note.

comment

1980

comment by: *DGAC Direction Générale de l'aviation civile*

General comments

Regulation (EC) N°216/2008 establishes that EASA produces rules and will standardise States to oversee them. However, the projects for implementing rules and associated AMCs, and certification specifications, have a wider scope than Regulation (EC) N°216/2008 and raise some important points on responsibilities:

Too many implementing rules have been produced on authorities and some are not within the scope of Regulation (EC) N°216/2008.

Regulation (EC) N°216/2008 states that "The Agency shall conduct standardisation inspections *in the fields covered by Article 1(1), in order to monitor the application by national competent authorities of this Regulation and of its implementing rules, and shall report to the Commission.*" Only a finding raised on the process to certify aerodromes could indicate a lack of resources, or a bad organisation of the State. However, no hook in Regulation (EC) N°216/2008 enables to impose an organisation to States. Moreover, this is probably not in accordance with Lisbon treaty. This has been debated in an Aviation Group (end 2008), and the Commission had confirmed that it was not necessary to distinguish the State and the Competent authority, and that the organisation and the means of the State were up to them.

Finally, the obligations of such an authority go beyond the scope of Regulation (EC) N°216/2008 in this NPA2011-20 which regulates how the State should be organised:

- **In no case**, EASA should ask the States to have a "Management System", with additional requirements on personnel, notably

- functions to monitor compliance, which induces administrative burden and huge costs: this is the State competency.
- The authority regulated should be the one in charge of certification and safety oversight and be defined without prejudice to the organisation of the State: security, local planning, land use planning and environment authorities should not be mentioned in such a regulation authorities.

The responsibilities of the aerodrome operators induced by this Regulation are not in accordance with the French system too, which is probably not in accordance with Lisbon treaty. This is often due to the misuse of the word "ensure". This is a critical point, and in the indicated areas, the rules should be revised to solve this point.

Recommended practices are "desirable" for both "safety", "efficiency" and "regularity". However, most of the recommended practices within ICAO Annex 14 Volume 1 have been taken as CS, which will become binding in the aerodrome certification basis. Some recommended practices are specifications which do not contain a clear safety objective: adding them as written in ICAO Annex 14 Volume 1 in the CS is too stringent, as they will become "standards" through the certification basis, and the State will not be able to accept an ELOS as ICAO Annex 14 Volume 1 does not detail the safety objective. For all these recommended practices, it is asked: either to put them in GM, or to add in the CS the safety objective, to enable States to accept ELOS.

There is too much administrative burden in the exchanges between both:

- the aerodrome operator and the State;
- the State and EASA.

This administrative burden will induce huge costs and more staff for no real safety benefit: it is asked to modify the rules to solve this point.

response

Noted

Technical suggestions are addressed in the relevant sections.

comment

2012

comment by: *Tarbes-Lourdes-Pyrénées airport*

Attachment [#15](#)

See Comment B.I 3543

NPA 2011-20 (B.I-II) Com gal 8

Respect du règlement de base

Traduction de courtoisie

The principle of the basic regulation to be proportionate to the size, the traffic, the category and the complexity of the aerodrome is not really reflected in the regulation.

response Noted

The Agency feels that it has respected the Basic Regulation principles for proportionality and has taken account of the variations in airport infrastructure in the Community.

comment 2126 comment by: *Munich Airport International*

- References to ICAO Documents within tables, figures and text need to be removed or aligned with EASA references.
- Numeration of Figures and tables needs to be consistent
- Repeating paragraphs with the same content need to be removed (e.g. DSN.H.425 (f),(g),(h) or DSN.M.760 (c))
- No proposed Amendments to ICAO Documents should be included into EASA as long as there not finally agreed by ICAO.
- There are chapters, which are making reference to tables which are not included.
- The provisions for flexibility, customised compliance and proportionality given under the existing ICAO system, are not satisfactorily reflected in the NPA documents although this was stated by EASA as a basis for the Rulemaking process. It is notably due to the fact that recommendations have been transposed to the same level as standards. To reflect the necessity for flexibility, customised compliance and proportionality numbers, figures and tables should be moved from CS to GM combined with adding the purpose and need for a certain design element to CS as a basis for its application.

response Noted

Numbering: Numbering, references, and duplications have been corrected.

ICAO SL 41: Concerning the adoption of the proposals included in ICAO SL 41-2011 the Agency decided not to follow them for the time being.

Flexibility, customised compliance and proportionality: Noted. The Agency feels that it has respected the Basic Regulation principles for proportionality, better regulation, customised compliance and has taken account of the variations in airport infrastructure in the Community. Flexibility at the AMC/CS level is for all requirements given by installation of Alternative alternative means of compliance, ELoS and Special Condition, regardless of its status on ICAO level. This issue is further explained in the Explanatory Note.

comment 2169 comment by: *Swedish Regional Airport Association*

The principle of that regulations should be proportionate to the size, traffic, category and complexity of the aerodrome and nature as well as the volume of operations thereon should be reflected in the AMC:s. The large differences in the nature of the European airports create a need for flexible regulations that allows smaller airports with specific conditions to operate without large cost and administration.

response Noted

The Agency feels that it has respected the Basic Regulation principles for proportionality and has taken account of the variations in airport infrastructure in the Community.

comment	2197	comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i>
	NPA 2011-20 (B.I-II) Com gal 8 Commentaires ACA	
	<u>Respect du règlement de base</u> <u>Commentaire</u>	
	Les dispositions du règlement de base relatives à la proportionnalité des mesures par rapport à la taille, au trafic, à la catégorie et à la complexité de l'aérodrome, ne sont pas réellement transcrites dans le règlement.	
	<u>Traduction de courtoisie</u>	
	The principle of the basic regulation to be proportionate to the size, the traffic, the category and the complexity of the aerodrome is not really reflected in the regulation.	
response	Noted	
	The Agency feels that it has respected the Basic Regulation principles for proportionality and has taken account of the variations in airport infrastructure in the Community.	

comment	2211	comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i>
	NPA 2011-20 (B.I-III) Com gal 1 Commentaires ACA	
	<u>Objet et portée du règlement</u> <u>Commentaire</u>	
	La rédaction du règlement de l'AESA et des autres documents soumis à consultation ne permet pas de déterminer avec certitude l'objet et la portée juridique de ces textes.	
	En effet il n'est pas possible de savoir si le règlement :	
	- d'une part crée des obligations pour d'autres personnes que l'autorité compétente et l'exploitant d'aérodrome ainsi que leurs préposés, par exemple des collectivités locales ou des propriétaires à l'extérieur du périmètre aéroportuaire,	
	- d'autre part si le règlement est créateur de droits au profit des usagers qui pourraient engager des recours sur la base de celui-ci.	
	Par ailleurs, la portée juridique des autres documents préparés par l'AESA demeure incertaine. Ainsi, dans sa notice explicative (paragraphe 16), l'Agence indique que les moyens acceptables de conformité (AMC) ne sont pas essentiel (<i>non-essential</i>) et ne sont pas contraignants (<i>non-binding</i>). Or, la rédaction de l'ADR.OR.015 est en contradiction avec cette affirmation : l'exploitant d'aérodrome ne peut s'écarter d'un AMC, au moyen d'un moyen alternatif de conformité, que sur autorisation expresse de l'autorité compétente. Ce sujet doit impérativement être clarifié car les commentaires qui peuvent être fait sur les AMC dépendent en très grande partie de leur portée juridique.	
	ACA estime que la réglementation de l'AESA ne devrait concerner que la	

certification des aérodromes. Pour cela, elle s'appuie sur le fait que toutes les spécifications de la NPA ne sont prévues que dans un cadre de certification de l'aérodrome.

ACA est donc favorable à ce que l'objet de la réglementation soit mieux délimité par l'article 1^{er} du règlement d'exécution ("*cover regulation*"). A défaut d'une telle précision, le règlement de l'AESA viendrait interférer avec d'autres domaines échappant au domaine de compétences de l'AESA, notamment relatives à l'assistance en escale, aux règles d'urbanisme ou à la sécurité civile.

Traduction de courtoisie

There is a doubt about the object and the scope of the EASA regulation on aerodromes, issue of the present NPA.

- Does this regulation create obligations towards other entities than the competent authority and the aerodrome operator such as local authorities or owners outside of the airport boundaries?

- Does the regulation creates rights for users of the airport and enables them to introduce court claims on this basis?

Besides, the legal applicability of others documents prepared by the EASA is uncertain. In its explanatory note (paragraph 16), the agency indicates that AMCs are non-essential and non-biding whereas the ADR.OR.A.015 is in contradiction with this affirmation: "*The aerodrome operator may implement these alternative means of compliance subject to prior approval by the competent authority and upon receipt of the notification*". This must imperatively be clarified because all comments on AMC are largely related to their juridical value.

ACA considers that EASA's regulation should only be related to the certification of aerodromes. This position is confirmed by the fact that every specification of the NPA have been provided only in the scope of an aerodrome certification.

To this end, ACA is in favour of a better delimitation of the regulation object at article 1 of cover regulation. Without such precision, the regulation would interfere with other activities which are note in the scope of competence of the EASA notably concerning ground handling, urbanism and public security.

response Noted

comment 2216 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

NPA 2011-20 (B.I-III) Com gal 2
Commentaires ACA

Responsabilité de l'exploitant

Commentaire

Le règlement de l'AESA augmente de manière significative le nombre de missions de l'exploitant d'aérodrome par rapport à la situation existante, du moins en France.

La logique réglementaire devrait amener à contre balancer cette augmentation en donnant les pouvoirs nécessaires à l'exploitant d'aérodrome pour effectuer ces nouvelles missions. Or, le présent règlement ne peut pas conférer de tels pouvoirs à l'exploitant pour l'ensemble des missions qui lui sont confiées.

En effet, la répartition des missions qui répond parfois à des exigences

constitutionnelles comme c'est le cas lorsqu'elles sont attribuées aux autorités publiques, échappe en grande partie aux compétences de l'AESA.

De plus, certaines dispositions portant sur les missions de l'exploitant d'aérodrome ne tiennent pas compte des principes de subsidiarité et de proportionnalité.

La sécurité du trafic aérien doit être assurée sans bouleverser la répartition actuelle des compétences au sein de chacun des Etats. Chaque Etat doit conserver la possibilité de désigner les autorités et organismes en charge des missions visées par le règlement, notamment s'agissant des mesures qui doivent être mises en œuvre à l'extérieur du périmètre de l'aéroport.

Dans certains autres cas le maintien des compétences des autorités publiques répond à des exigences fixées par L'union Européenne. A titre d'exemple, la Directive 96/67/ CE du Conseil du 15 octobre 1996 (modifiée) qui organise l'accès au marché de l'assistance en escale dans les aéroports de la Communauté. Il résulte des dispositions de l'article 14 de la Directive précitée, que si l'activité d'un prestataire d'assistance en escale sur un aéroport peut être subordonnée à des conditions de sécurité des aéronefs, des équipements et des personnes, l'article 14 de la Directive ordonne que ces conditions soient définies et appliquées par une « autorité publique indépendante de l'entité gestionnaire de l'aéroport » au travers de la procédure d'agrément. L'exploitant d'aéroport se voit par conséquent interdire la possibilité de refuser l'accès à l'aéroport ou retirer un accès préalablement consentis à un assistant en escale au motif que son activité ne respecterait pas les critères de sécurité des aéronefs, des équipements et des personnes. Sur ce point, le projet de Règlement (référence interinstitutionnelle 2011/0397(COD)) visant à remplacer la Directive précitée n'apporte pas d'évolution et maintien la dévolution des pouvoirs d'appréciations des conditions de sécurité des de l'aéroport, des aéronefs et de personnes à une autorité indépendante de l'exploitant d'aéroport (article 16 du projet en date du 16/03/2012).

En conséquence ACA fait la proposition de rajouter un nouvel article entre l'article 2 et l'article 3 de la « cover regulation » au livre I, développé ci-après.

Proposition

Article 2 bis : "Autorités compétentes"

Les points 1 et 2 de l'article 3 de la « cover regulation » existant (« 1. Member States shall designate [...] No 216/2008. ») sont intégrés dans ce nouvel article 2 bis car ils sont les premières règles de constitution des autorités compétentes sortant du cadre stricto sensu de la surveillance.

Ces paragraphes sont complétés par l'ajout du paragraphe suivant: "Lorsque des missions indiquées dans les annexes au présent règlement sont assurées par une entité indépendante de l'exploitant d'aérodrome, l'autorité compétente vérifie que toutes les exigences essentielles sont couvertes et elle décrit la répartition des missions dans les clauses d'approbation du certificat."

Traduction de courtoisie

The EASA regulation increases significantly the responsibility of the aerodrome operator compared to the existing situation in France. More and more missions have been put under the responsibility of aerodrome operator.

The rulemaking rationale should lead to counter balance this increase of responsibilities by conferring the necessary powers to the aerodrome operator in order to assume his new responsibilities. But the EASA regulation cannot confer such powers to the operator. Indeed, the repartition of responsibilities in member States is, in some cases, conducted under constitutional rules, for example when they are affected to public authorities, is largely out of the scope of the EASA.

Moreover, some provisions relating to the missions of the aerodrome operator do not take into account the principles of subsidiarity and proportionality. The safety of air transport must be assured without altering the repartition of the missions in member States. Each member States must have the possibility to designate authorities or entities in charge of the missions mentioned in the regulation notably concerning the obligation outside of the airport perimeter.

In others cases, the maintaining of competencies of public authorities is fixed by EU requirements. It is for example the case with the Directive (modified) n° 96/67/ CE dated 15 October 1996 related to the ground handling. Article 14 of this directive indicates that if the activity of a ground handler might be dependent on safety conditions of aircraft, equipment and persons, such conditions shall be defined and implemented by a public authority independent of the aerodrome operator through an agreement process. Consequently, the aerodrome operator has no power to forbid the access of a ground handler at the airport or to suspend this access for reasons related to safety. The draft of the future regulation to replace this directive does not modify this aspect (article 16 of the draft dated 16/03/2012).

Consequently, ACA suggests to insert a new article between article 2 and article 3 of the cover regulation :

Article 2 bis: "competent authorities"

Points 1 and 2 of article 3 of the cover regulation (« 1. Member States shall designate [...] No 216/2008. ») must be integrated in this new article 2 bis because they are the first rules about competent authority apart from the scope of monitoring, *stricto sensu*. These paragraphs are completed with the addition of the following paragraph: "When the responsibilities mentioned in the annexes of this regulation are assumed by an entity which is independent from the aerodrome operator, the competent authority shall ensure that all the essential requirements are covered and shall describe the allocation of these responsibilities in the approval terms of the certificate."

response Noted

comment 2222 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

NPA 2011-20 (B.I-III) Com gal 3
Commentaires ACA

Nombre de spécifications de certification (CS) et de moyens acceptables de conformité (AMC)

Commentaire

A l'intérieur de l'Union européenne, beaucoup d'efforts ont été entrepris pour réduire la charge administrative.

Or, le texte de la présente NPA comporte un nombre colossal de règles très précises.

Les descriptions et amendements détaillés dans ces exigences de l'AESA vont accroître la charge administrative et les coûts administratifs.

En conséquence, nous suggérons fortement que les règles d'application (IR) soient moins détaillées, qu'elles soient conçues pour fixer un cadre général et que beaucoup d'AMC et de CS soient transférés en éléments informatifs (GM). Ainsi, de nombreux textes doivent plutôt être considérés comme des exemples à suivre et non comme des solutions imposées indifféremment à tous, d'autant que beaucoup d'entre eux n'ont pas d'effets directs sur la sécurité.

Traduction de courtoisie

Many efforts have been undertaken in the European Union to reduce the administrative burden. But the text of the NPA contains a great volume of very specific rules. These provisions will considerably increase administrative burdens and costs.

Consequently, we strongly suggest on one hand to have Implementing rules (IR) less precise and to rather describe a general framework and on the on the hand to transfer many AMC and CS into guidance material (GM). Many texts should be considered as examples to follow instead of being solutions indifferently imposed to anybody, it is even more valid knowing that many of them have no direct effects on safety.

response

Partially accepted

On the side of the IRs, AMC as well as CS this review process has taken place. The Agency extensively reviewed its approach to notifications from the competent authorities to the Agency, and where possible deleted them or made them into an information requirement.

comment

2223

comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

NPA 2011-20 (B.I-III) Com gal 4
Commentaires ACA

Modification de l'annexe 14 de l'OACI

Commentaires

L'esprit de coopération dont a fait preuve l'AESA dans l'élaboration de la NPA a été très apprécié. En effet l'Agence a essayé de trouver certaines flexibilités pour les aérodromes. Malheureusement ces flexibilités s'avèrent insuffisantes car le projet de réglementation présenté aboutit en effet à une perte de la flexibilité procurée par le système OACI.

Ainsi le règlement reprend les normes et les recommandations de l'Annexe 14 de l'OACI de manière indifférenciée.

ACA souhaite fortement que les normes et recommandations de l'Annexe 14 ne soient pas traitées de la même manière afin de garder cette souplesse.

Aussi, ACA propose que l'AESA prenne comme principe que les recommandations de l'Annexe 14 soient considérées comme des règles de l'art et reprises comme éléments informatifs (GM).

ACA admet cependant, qu'après application de ce principe, certaines recommandations de l'OACI (peu nombreuses) puissent être remontées en spécification de certification (CS) ou en moyen acceptable de conformité (AMC), par exemple la recommandation relative aux largeurs de piste, mais de façon mesurée.

Par ailleurs, la NPA reprend de manière très parcellaire et incomplète les modifications de l'annexe 14 proposées par l'OACI dans sa lettre aux Etats n°41. Or ces modifications ont reçu l'aval de la commission « navigation aérienne » de l'OACI et de nombreux experts de cette organisation et elles doivent être applicables avant la date d'entrée en vigueur du règlement de l'AESA relatif aux aérodromes.

En conséquence ACA considère que l'AESA devrait reprendre globalement ces modifications afin aussi d'anticiper la future annexe 14 de l'OACI qui sera davantage fondée sur des objectifs ou performances à atteindre que sur des règles prescriptives.

Une telle anticipation évitera à l'Union européenne de se trouver confrontée à une réglementation obsolète dès sa publication.

ACA rappelle que l'annexe 14 a été pensée au milieu du siècle dernier pour la conception des aérodromes à une époque où l'espace pour créer de telles infrastructures ne manquait pas. Depuis, le paradigme a changé puisqu'il s'agit aujourd'hui d'avoir des règles pour certifier les aérodromes dans un contexte d'optimisation des ressources et de l'espace. Ce que les règles actuelles de l'annexe 14 ne reflètent que très incomplètement encore.

N.B. : ACA, dans plusieurs de ses commentaires détaillés sur les CS et les AMC, indique qu'il faut déplacer tel CS en GM. Il faut comprendre aussi que cela nécessite généralement une réécriture pour que n'apparaisse plus le terme « should » qui, dans le cadre de la réglementation AESA, ne devrait être utilisé que pour des CS ou des AMC.

Traduction de courtoisie

ACA appreciates the spirit of cooperation shown by EASA during the NPA process. EASA has tried to find solutions for flexibility. However, this effort is still not sufficient because the results lead to a loss of flexibility in comparison with the ICAO system. It is notably due to the fact that EASA takes up indistinctly ICAO standards and ICAO recommendations.

ACA strongly wish that EASA deals with ICAO recommendations and ICAO standards with different manners to keep the flexibility of ICAO system.

So ACA proposes that EASA takes as principle to consider ICAO recommendations as good practices only and transpose them into GM.

ACA admits that, after use of this principle, some ICAO recommendations (few) could be CS or AMC, for example the recommendation related to the runway width.

Moreover NPA reflects very partially and incompletely, the annex 14 modifications proposed by ICAO in its State letter n°41. These modifications have already been validated by the ICAO Air Navigation Commission and many ICAO experts. It is planned that these modifications would be applicable before the entry into force of EASA regulation.

ACA urges EASA to take up the contents of ICAO State Letter 41, also to anticipate the future ICAO annex 14, which will be more based on objectives or performances to reach than prescriptive rules. Such anticipation will prevent Europe from facing an obsolete regulation from its publication.

ACA reminds that Annex 14 has been thought out in the middle of the last century for airport design when there was still space around. Nowadays, the paradigm has changed because rules should be thought for aerodrome certification in an optimisation of space and resources. Existing annex 14 SARPS reflect very incompletely this new paradigm.

N.B.: in several comments about CS and AMC, ACA indicates that it is appropriate to transfer the CS or AMC into GM. Such transfer needs to rewrite the text so that the term "should" does not appear anymore. Indeed, this term should be used only for CS and AMC in the present regulation.

response Noted

comment 2225 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

NPA 2011-20 (B.I-III) Com gal 5
Commentaires ACA

Forme

Commentaire

La structure des règles et les références croisées rendent la lecture des

documents complexe et difficile à comprendre.

Traduction de courtoisie

The structure of the rules and cross references makes the document complex to read and understand.

response Accepted

comment 2226 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

NPA 2011-20 (B.I-III) Com gal 6
Commentaires ACA

Arrangements

Commentaire

Dans plusieurs pays dont la France, les autorités publiques ont un rôle essentiel en matière de sécurité aéroportuaire et disposent à cet effet de prérogatives particulières.

En France le cadre constitutionnel impose que certaines missions soient assurées par une autorité de l'Etat et c'est à ce titre que les préfets exercent des pouvoirs de police sur l'aéroport et à l'extérieur de l'aéroport, qu'il s'agisse de définir localement des règles de police ou de s'assurer de leur bonne application.

Dans le cadre des projets de l'AESA, ces sujets ne relèveraient plus de l'Etat, mais de l'exploitant d'aérodrome, en particulier par le biais d'arrangements passés entre celui-ci et les organisations fournissant des services sur l'aéroport (organismes chargés de la météo, de la sûreté, de la maintenance, transporteurs aériens...).

Pour permettre de faciliter la mise en œuvre du futur règlement de l'AESA, ACA propose que toutes les règles arrêtées par une autorité de l'Etat, y compris les mesures prises par les préfets, soient considérées comme des arrangements et demande que cela soit précisé dans le texte de l'AESA.

Traduction de courtoisie

In different member States including France, public authorities have an essential role concerning airport safety and are in charge of specific powers to this end.

In France the constitutional framework implies that some missions are assumed by a public authority such as the "préfets" who are in charge and have the power to enforce law and order on the aerodromes and also outside the aerodromes whether it is for the definition or the application of the rules.

With the EASA projects, these missions will not be affected to the public authority anymore but to the aerodrome operator by the way of arrangements between itself and others entities providing services at the

airport (MET, security, airlines...)

In order to facilitate the implementation of the future regulation, ACA suggests that every rule taken by a public authority, including rules adopted by the "préfets" must be considered as arrangements and this must be written in the EASA project.

response Noted

comment 2228 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

NPA 2011-20 (B.I-III) Com gal 7
Commentaires ACA

Langue

Commentaire

ACA attire l'attention de l'AESA sur le fait que ses futures règles doivent être comprises par tous les acteurs qui ont à l'utiliser. En conséquence, ces règles doivent être écrites dans la langue du pays et pas uniquement en langue anglaise.

Le §2.2.2 du « Regulatory Impact Assessment » (page 15/130) donnant le nombre d'aéroports de chaque Etat Membre touchés par la NPA indique que bon nombre d'aérodromes concernés sont français: « Looking at the result for individual Member States, France has two peculiarities in this European picture : it has the largest number of aerodromes (159) and it is also the country with the highest number of aerodromes below the BR threshold (72 i.e. in relative share 45%...[...]" . Les exploitants d'aéroports français sont donc spécialement intéressés à connaître, comprendre et apprécier la portée des règles rédigées par l'AESA et soumises à consultation dans le cadre de la NPA.

La consultation, uniquement en langue anglaise, ne permet pas aux exploitants d'aéroports français, ne disposant pas nécessairement des moyens de traduction suffisants, de connaître, comprendre et d'apprécier justement la portée des règles exposées dans la NPA. Par conséquent, les exploitants d'aéroports français ne sont pas mis en mesure de faire usage de tous les droits qui leur sont reconnus par l'article 6-1 « consultation » de la « Rulemaking Procedure » applicable lors de la rédaction et de la publication de la NPA. Cet article dispose que "Any person or organization with an interest in the rule under development shall be entitled to comment on the basis of the published NPA, without discrimination on the basis of nationality".

L'article 32-2 du Règlement de Base (CE N°216/2008) prévoit que les travaux de traduction requis pour le fonctionnement de l'AESA sont effectués par le Centre de traduction des organes de l'Union Européenne.

Cela rejoint aussi la règle ADR.OR.E.005 (i) relative au manuel d'aérodrome. Il est en effet indiqué que le manuel d'aérodrome doit refléter la base de certification et doit être dans une langue acceptable de l'autorité compétente et comprise par tout le personnel amené à l'utiliser. Aussi les IR-OPS, les AMC et les CS, éléments de la base de certification,

doivent, a minima, être écrits dans la langue du pays concerné.

En outre, l'exigence d'utiliser la langue officielle compréhensible par tous se retrouve dans la plupart des Constitutions nationales.

En conséquence les règles de l'AESA relatives aux aéroports doivent aussi être écrites en français pour pouvoir être correctement utilisées sur les aéroports français.

C'est pourquoi, ACA demande à l'AESA d'apporter ses réponses aux **questions suivantes** :

1. En quoi l'absence de traduction en français de la NPA serait respectueuse de l'article 58-2 du Règlement de Base relatif à la transparence et à la communication ? Cet article stipule que l'Agence veille à ce que le public et toute partie intéressée reçoivent rapidement une information objective, fiable et aisément compréhensible concernant ses travaux.

2. En quoi l'absence de traduction en français de la NPA serait respectueuse de la « Rulemaking Procedure » applicable lors de la rédaction et de la publication de la NPA (§2 Explanatory Note page 5/22) ? Cette « Rulemaking Procedure » a été décidée par le Conseil d'Administration du 13 juin 2007 (EASA Management Board Decision 08-2007 –Decision amending and replacing the Rulemaking Procedure – MB Meeting 03-2007) en application de l'article 52 du Règlement de Base . En particulier, en quoi cette absence de traduction serait respectueuse de l'article 6-1 de la Rulemaking Procedure » (précité) et de l'article 52-1-c) du Règlement de Base stipulant que les procédures « garantissent que l'AESA procède à la diffusion des documents et à une large consultation des parties intéressées, ...[...] » ?

3. En quoi l'absence de traduction de la NPA, en français, serait respectueuse de l'article 22 de la Charte des Droits fondamentaux de l'Union Européenne (2010/C 83/02) qui stipule que l'Union Européenne respecte la diversité linguistique ?

4. En quoi l'absence de traduction en français de la NPA, n'enfreindrait pas l'interdiction des discriminations en raison de la nationalité stipulée à l'article 18 du Traité sur le Fonctionnement de l'Union Européenne (TFUE)?

5. En quoi l'absence de traduction en français de la NPA serait respectueuse de l'article 342 du TFUE (ancien article 290 du Traité) et du Règlement n°1 (modifié) portant fixation du régime linguistique de l'Union Européenne ? En particulier, en quoi cette absence de traduction serait compatible avec les exigences des articles 1, 2 et 4 du Règlement n°1? Les articles précités énumèrent la liste des langues officielles et des langues de travail des institutions de l'Union, dont le français. Ils prévoient également que les textes adressés par les institutions à un Etat membre ou à une personne relevant de la juridiction d'un Etat membre sont rédigés dans la langue de cet Etat. Ils stipulent enfin que les textes de portée générale sont rédigés dans les langues officielles.

6. Dans le cas où les réponses aux questions qui précèdent ne

seraient pas satisfaisantes au regard du droit positif applicable, comment l'AESA entend reprendre la procédure de NPA afin d'y remédier et procéder pour la publication de ses règles ?

Traduction de courtoisie

ACA draw the attention of EASA on the fact that its futures rules shall be understood by all the actors, who have to use them. Consequently, these rules shall be written in the national language of the State and not only in English.

§2.2.2 of the « Regulatory Impact Assessment » (page 15/130) giving the number of French airports entering the scope of the future EASA rules indicate that many of them are French: "Looking at the result for individual Member States, France has two peculiarities in this European picture : it has the largest number of aerodromes (159) and it is also the country with the highest number of aerodromes below the BR threshold (72 i.e. in relative share 45%...[...]" French airports are so particularly interested to know, understand and appreciate the impact of the EASA rules of this NPA.

The consultation, only in English, does not allow to French airports operators, having no sufficient translation means, to know, understand and correctly appreciate the impact of the rules proposed in this NPA. Consequently, French aerodrome operators are not able to use all their rights, which are recognized by article 6.1 of the "rulemaking procedure", applicable for the redaction and the publication of NPA: "Any person or organisation with an interest in the rule under development shall be entitled to comment on the basis of the published NPA, without discrimination on the basis of nationality".

Article 32-2 of the basic regulation (CE N°216/2008) indicates that all the translation works required for the EASA functioning are performed by the translation center of the EU.

It is also in line with ADR.OR.E.005 (i) related to the aerodrome manual. Indeed, it is indicated that the aerodrome manual shall reflect the basis certification and shall be in a language acceptable by the competent authority and understandable by everyone, who has to use it. So, IR-OPS, AMC and CS, elements of the certification basis shall be written in the official language recognized by the Member State.

Besides, this requirement of the use of the official language appears in most of national constitutions.

In consequence, the EASA regulation shall be written in French to be correctly applied on French aerodromes.

It is why, ACA ask EASA to answer to the following questions.

1. How the fact to have no French version of EASA rules could be considered as compliant with article 58-2 of the basic regulation on

transparency and communication ? This article indicates that the agency ensure the public and any interested party are rapidly given objective, reliable and easily understandable information with regard to its.

2. How the fact to have no French version of EASA rules could be considered as compliant with the « Rulemaking Procedure » applicable for the redaction and publication of the NPA (§2 Explanatory Note page 5/22) ? This « Rulemaking Procedure » is the subject of the EASA Management Board Decision 08-2007 –Decision amending and replacing the Rulemaking Procedure – MB Meeting 03-2007- in application of article 52 of the basic regulation. In particular, How the fact to have no French version of EASA rules could be considered as compliant with article 6-1 of the EASA Rulemaking Procedure and article 52-1-c) of the basic regulation (“the procedures ensure ensure that the Agency publishes documents and consults widely with interested parties...”).

3. How the fact to have no French version of EASA rules could be considered as compliant with the article 22 of the Charter of fundamental rights of the European Union (2010/C 83/02) which stipulates that the European Union respects the linguistic diversity?

4. How the fact to have no French version of EASA rules could be considered as compliant with the interdiction of discrimination due to the nationality as stipulated in article 18 of the Treaty on the functioning of European Union?

5. How the fact to have no French version of EASA rules could be considered as compliant with article 342 of the Treaty on the functioning of European Union (former article 290) et of the regulation n°1 (modified) governing the languages of the European Union (in particular articles 1, 2 et 4)? These articles give the list of the official languages and the work languages of the EU institutions, including French among others. They also indicate that the r delivered by the EU institutions to a member State or at a citizen of this Member State shall be in the official language of this State and that the general texts are written in official languages.

6. If the answers to the here above questions would not be satisfactory vis-à-vis the applicable rules, how EASA plans to correct the NPA process used and to proceed for the publication of its set of rules ?

response Noted

comment 2235 comment by: *IDRF e.V. (association of regional airports)*

This part of the NPA contains a lot of AMCs which are too detailed and the adequacy for smaller aerodromes is not given. In particular the AMCs for safety management and RFF-services are made for big aerodromes. AMC6-ADR-OPS.B.010 is an example for this excessiveness.

NPA 2011-20 (B.II) has to be reviewed, taking into account smaller aerodromes and aerodromes without schedule traffic. Unfortunately our members have only very limited capacities for which reason we are not able to deliver justified comments within the time available, but we would be able to assist a potential review.

response

Noted

Concerning the RFF services, the Agency decided to follow ICAO provisions. ICAO doesn't make any distinction between small and large aerodromes. The RFFS category is related to the type of aircraft.

comment

2279

comment by: ADP : Aeroports de Paris

Commentaires

L'esprit de coopération dont a fait preuve l'AESA dans l'élaboration de la NPA a été très apprécié. En effet l'Agence a essayé de trouver certaines flexibilités pour les aérodromes. Ces flexibilités s'avèrent cependant insuffisantes car le projet de réglementation présenté aboutit en effet à une perte de la flexibilité actuelle procurée par le système OACI.

Ainsi le règlement reprend les normes et les recommandations de l'Annexe 14 de l'OACI de manière indifférenciée.

ADP insiste pour que les normes et recommandations de l'Annexe 14 ne soient pas traitées de la même manière afin de garder la souplesse du système OACI.

ADP propose donc que l'AESA adopte comme principe que les recommandations de l'Annexe 14 soient considérées comme des règles de l'art et reprises comme éléments informatifs (GM).

Par ailleurs, la NPA reprend de manière très parcellaire et incomplète les modifications de l'annexe 14 proposées par l'OACI dans sa lettre aux Etats n°41. Or ces modifications ont reçu l'aval de la commission « navigation aérienne » de l'OACI et elles devraient être applicables avant la date d'entrée en vigueur du règlement de l'AESA relatif aux aérodromes.

ADP considère que l'AESA devrait reprendre globalement ces modifications.

Une telle anticipation éviterait à l'Union européenne de se trouver confrontée à une réglementation obsolète dès sa publication.

Traduction de courtoisie

ADP appreciates the spirit of cooperation shown by EASA during the NPA process. EASA has tried to find solutions for flexibility. However, this effort is still not sufficient because the results lead to a loss of flexibility in comparison with the ICAO system. It is notably due to the fact that EASA takes up indistinctly ICAO standards and ICAO recommendations.

ADP strongly wish that EASA deals with ICAO recommendations and ICAO standards with different manners to keep the flexibility of ICAO system.

So ADP proposes that EASA takes as principle to consider ICAO recommendations as good practices only and transpose them into GM.

Moreover NPA reflects very partially and incompletely, the annex 14 modifications proposed by ICAO in its State letter n°41. These modifications have already been validated by the ICAO Air Navigation Commission. It is planned that these modifications would be applicable before the entry into force of EASA regulation.

ADP urges EASA to take up the contents of ICAO State Letter 41, also to anticipate the future ICAO annex 14. Such anticipation will prevent Europe from facing an obsolete regulation from its publication.

response

Noted

comment

2281

comment by: ADP : Aeroports de Paris

Commentaire

ADP (Aéroports de Paris) attire l'attention de l'AESA sur le fait que ses futures règles doivent être comprises par tous les acteurs qui ont à l'utiliser. En conséquence, ces règles doivent être écrites dans la langue du pays et pas uniquement en langue anglaise.

L'article 32-2 du Règlement de Base (CE N°216/2008) prévoit que les travaux de traduction requis pour le fonctionnement de l'AESA sont effectués par le Centre de traduction des organes de l'Union Européenne.

Cela rejoint aussi la règle ADR.OR.E.005 (i) relative au manuel d'aérodrome. Il est en effet indiqué que le manuel d'aérodrome doit refléter la base de certification et doit être dans une langue acceptable de l'autorité compétente et comprise par tout le personnel amené à l'utiliser. Aussi les IR-OPS, les AMC et les CS, éléments de la base de certification, doivent, a minima, être écrits dans la langue du pays concerné.

En outre, l'exigence d'utiliser la langue officielle compréhensible par tous se retrouve dans la plupart des Constitutions nationales.

En conséquence les règles de l'AESA relatives aux aérodromes doivent aussi être écrites en français pour pouvoir être correctement utilisées sur les aérodromes français.

ADP demande à l'AESA d'apporter ses réponses aux **questions suivantes** :

1. En quoi l'absence de traduction en français de la NPA serait respectueuse de l'article 58-2 du Règlement de Base relatif à la transparence et à la communication ? Cet article stipule que l'Agence veille à ce que le public et toute partie intéressée reçoivent rapidement une information objective, fiable et aisément compréhensible concernant ses travaux.

2. En quoi l'absence de traduction en français de la NPA serait respectueuse de la « Rulemaking Procedure » applicable lors de la rédaction et de la publication de la NPA (§2 Explanatory Note page 5/22) ? Cette « Rulemaking Procedure » a été décidée par le Conseil d'Administration du 13 juin 2007 (EASA Management Board Decision 08-2007 –Decision amending and replacing the Rulemaking Procedure – MB Meeting 03-2007) en application de l'article 52 du Règlement de Base . En particulier, en quoi cette absence de traduction serait respectueuse de l'article 6-1 de la Rulemaking Procedure » (précité) et de l'article 52-1-c) du Règlement de Base stipulant que les procédures « garantissent que l'AESA procède à la diffusion des documents et à une large consultation des parties intéressées, ...[...] » ?

3. En quoi l'absence de traduction de la NPA, en français, serait respectueuse de l'article 22 de la Charte des Droits fondamentaux de l'Union Européenne (2010/C 83/02) qui stipule que l'Union Européenne respecte la diversité linguistique ?

4. En quoi l'absence de traduction en français de la NPA, n'enfreindrait pas l'interdiction des discriminations en raison de la

nationalité stipulée à l'article 18 du Traité sur le Fonctionnement de l'Union Européenne (TFUE)?

5. En quoi l'absence de traduction en français de la NPA serait respectueuse de l'article 342 du TFUE (ancien article 290 du Traité) et du Règlement n°1 (modifié) portant fixation du régime linguistique de l'Union Européenne ? En particulier, en quoi cette absence de traduction serait compatible avec les exigences des articles 1, 2 et 4 du Règlement n°1? Les articles précités énumèrent la liste des langues officielles et des langues de travail des institutions de l'Union, dont le français. Ils prévoient également que les textes adressés par les institutions à un Etat membre ou à une personne relevant de la juridiction d'un Etat membre sont rédigés dans la langue de cet Etat. Ils stipulent enfin que les textes de portée générale sont rédigés dans les langues officielles.

6. Dans le cas où les réponses aux questions qui précèdent ne seraient pas satisfaisantes au regard du droit positif applicable, comment l'AESA entend reprendre la procédure de NPA afin d'y remédier et procéder pour la publication de ses règles ?

Traduction de courtoisie

ADP draw the attention of EASA on the fact that its futures rules shall be understood by all the actors, who have to use them. Consequently, these rules shall be written in the national language of the State and not only in English.

Article 32-2 of the basic regulation (CE N°216/2008) indicates that all the translation works required for the EASA functioning are performed by the translation center of the EU.

It is also in line with ADR.OR.E.005 (i) related to the aerodrome manual. Indeed, it is indicated that the aerodrome manual shall reflect the basis certification and shall be in a language acceptable by the competent authority and understandable by everyone, who has to use it. So, IR-OPS, AMC and CS, elements of the certification basis shall be written in the official language recognized by the Member State.

Besides, this requirement of the use of the official language appears in most of national constitutions.

In consequence, the EASA regulation shall be written in French to be correctly applied on French aerodromes.

ADP ask EASA to answer to the following questions.

1. How the fact to have no French version of EASA rules could be considered as compliant with article 58-2 of the basic regulation on transparency and communication ? This article indicates that the agency ensure the public and any interested party are rapidly given objective, reliable and easily understandable information with regard to its.

2. How the fact to have no French version of EASA rules could be considered as compliant with the « Rulemaking Procedure » applicable for

the redaction and publication of the NPA (§2 Explanatory Note page 5/22) ? This « Rulemaking Procedure » is the subject of the EASA Management Board Decision 08-2007 –Decision amending and replacing the Rulemaking Procedure – MB Meeting 03-2007- in application of article 52 of the basic regulation. In particular, How the fact to have no French version of EASA rules could be considered as compliant with article 6-1 of the EASA Rulemaking Procedure and article 52-1-c) of the basic regulation (“the procedures ensure ensure that the Agency publishes documents and consults widely with interested parties...”).

3. How the fact to have no French version of EASA rules could be considered as compliant with the article 22 of the Charter of fundamental rights of the European Union (2010/C 83/02) which stipulates that the European Union respects the linguistic diversity?

4. How the fact to have no French version of EASA rules could be considered as compliant with the interdiction of discrimination due to the nationality as stipulated in article 18 of the Treaty on the functioning of European Union?

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6. If the answers to the here above questions would not be satisfactory vis-à-vis the applicable rules, how EASA plans to correct the NPA process used and to proceed for the publication of its set of rules ?

response

Noted

comment

2283

comment by: *ADP : Aeroports de Paris*

Commentaire

ADP (Aéroports de Paris) considère que les dispositions du règlement de base relatives à la proportionnalité des mesures par rapport à la taille, au trafic, à la catégorie et à la complexité de l'aérodrome, ne sont pas réellement transcrites dans le règlement.

Traduction de courtoisie

ADP considers that the principle of the basic regulation to be proportionate to the size, the traffic, the category and the complexity of the aerodrome is not really reflected in the regulation.

response

Noted

The Agency feels that it has respected the Basic Regulation principles for proportionality, and has taken account of the variations in airport infrastructure in the Community.

comment	2357	comment by: <i>CANSO Civil Air Navigation Services Organization</i>
	CANSO recommends the use of "should" in GM, no "should" in AMC and the use of a single AMC to the same IR and a single GM to the same AMC	
response	Noted	
	Based on the status of IR, AMC, CS and GM, 'shall' or 'should' is used. GM (Guidance Material) or AMC (Acceptable Means of compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.	
comment	2489	comment by: <i>Fraport AG</i>
	Attachment #16	
	see comments B.II 2625-2677	
	This coment is done by seperat document, which is attached.	
	30.04.2012 Fraport AG, Boris Wilke	
response	Noted	
	Proportionality: The Agency feels that it has respected the Basic Regulation principles for proportionality, better regulation, customised compliance and has taken account of the variations in airport infrastructure in the Community.	
	Numbering: Numbering and references have been corrected.	
	Administrative burden: Partially accepted. On the side of the IRs, AMC, as well as CS, this review process has taken place. The Agency extensively reviewed its approach to notifications from the competent authorities to the Agency and where possible deleted them or made them into an information requirement.	
comment	2625	comment by: <i>Fraport AG</i>
	The principle of the BR to be proportionate to the size, traffic, category and complexity of the aerodrome and nature as well as the volume of operations t hereon. (Art. 8a (6) (b)) should be reflected in t he regulation.	
response	Noted	
	The Agency feels that it has respected the Basic Regulation principles for proportionality, better regulation, customised compliance and has taken account of the variations in airport infrastructure in the Community.	
comment	2626	comment by: <i>Fraport AG</i>
	Check typing, numeration, headings and layout in pages in different pages	

response Accepted
Numbering and references have been corrected.

comment 2627 comment by: *Fraport AG*
There is a need for a consistent numbering process for all tables and figures as well as their references. For example, AMC2.ADR.OPS.B.075. In some chapter the ICAO references are still in (e.g. AMC1-ADR-AR.C.065(b) – Obstacles – Objects, Figure 1 on page 47)

response Accepted
Numbering and references have been corrected.

comment 2628 comment by: *Fraport AG*
Within the EU a lot of effort has been put in place to reduce the administrative load enforced by governments.
The detailed descriptions and amendments in these EASA requirements will decrease, but increase the administrative workload and administrative costs. Therefore we suggest to make the implementing rules less detailed and more like a framework and a transfer many AMCs and CS into Guidance Material.

response Partially accepted
On the side of the IRs, AMC, as well as CS, this review process has taken place. The Agency extensively reviewed its approach to notifications from the competent authorities to the Agency, and where possible deleted them or made them into an information requirement.

NPA 2011-20 (B.II) – AMC/GM – AMC1 – Article 3 Oversight capabilities p. 2

comment 859 comment by: *NATS National Air Traffic Services Limited*
Whilst it is understood that it is possible to have AMC to Articles this text reads as if better placed in the Article itself.

response Accepted
This AMC was moved in the Article 3. There can be Guidance Material to articles, and there will be more as we have moved material from Part-AR to the Cover Regulation.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART A – GENERAL REQUIREMENTS (ADR.AR.A) – GM1-ADR.AR.A.010 – Oversight documentation p. 2

comment	65	comment by: <i>Flughafen Düsseldorf GmbH</i>
	GM1-ADR.AR.A.010 – Oversight documentation	
	AVAILABILITY OF DOCUMENTATION TO THIRD PARTIES	
	The legislative acts, standards, rules, technical publications and similar documents can be made available, in a timely manner, to the aerodrome operators and <u>any other interested party [g1]</u> in various ways and formats, such as via its website, the government's official gazette, or any other similar means.	
	<u>[g1]</u> Geht zu weit! Berechtigtes Interesse sollte notwendig sein.	
response	Not accepted	
	Making the regulated persons and organisations aware of which regulations they have to abide by is the part of good administrative practice.	
comment	860	comment by: <i>NATS National Air Traffic Services Limited</i>
	AMC/GM to Annex I (Title) - This Part is incorrectly titled when compared to IR. Suggest amend to "AMC/GM to Annex I Part - Authority Requirements Aerodromes (Part-ADR.AR)".	
response	Noted	
comment	861	comment by: <i>NATS National Air Traffic Services Limited</i>
	Second paragraph, typo "..application of fees, it is for the..." Suggest delete "it".	
response	Accepted	
comment	1492	comment by: <i>ECA - European Cockpit Association</i>
	Change as follows: The way for making such material available, including possible application of fees, it is for the competent authority to decide.	
	Justification: Editorial comment.	
response	Noted	
comment	2128	comment by: <i>Aberdeen Airport Airside Operations</i>
	Clarification??	
	what is meant by "only if processed again"? Does this mean the Alternative Means of Compliance can be individually selected by competent authorities? Should they be applicable across the EU if approved?	
response	Not accepted	

Coment was wrongly placed. It belongs to GM1 ADR.AR.015.
Here is the answer:

Accepted alternative means of compliance are indeed not applicable to all European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART A – GENERAL REQUIREMENTS (ADR.AR.A) – GM1-ADR.AR.A.015 – Means of compliance

p. 2

comment	289	comment by: <i>BAA Airside operations</i>
	Clarification? What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved by a competent authority in the EU?	
response	Not accepted Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.	
comment	584	comment by: <i>Belfast International Airport - BFS/EGAA</i>
	What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved?	
response	Not accepted Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.	

comment	<p>862 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>This text is written in the form of a requirement even if there is no "shall". Suggest elevate the text to IR.</p>			
response	<p>Not accepted</p> <p>We have kept this as GM throughout the domains, not IR.</p>			
comment	<p>1005 comment by: <i>Bristol Airport - BRS/EGGD</i></p> <table border="1" data-bbox="386 593 1401 766"> <tr> <td data-bbox="386 593 603 766">GM1-ADR.AR.A.015</td> <td data-bbox="603 593 790 766">Clarification?</td> <td data-bbox="790 593 1401 766">What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved?</td> </tr> </table>	GM1-ADR.AR.A.015	Clarification?	What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved?
GM1-ADR.AR.A.015	Clarification?	What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved?		
response	<p>Not accepted</p> <p>Accepted alternative means of compliance are indeed not applicable to all European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.</p>			
comment	<p>1161 comment by: <i>Gatwick Airport Ltd</i></p> <p>Clarification?</p> <p>What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved?</p>			
response	<p>Not accepted</p> <p>Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.</p>			
comment	<p>1658 comment by: <i>Stansted Airport</i></p> <p>GM1-ADR.AR.A.015</p> <p>Clarification?</p>			

	<p>What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved?</p>
response	<p>Not accepted</p> <p>Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.</p>
comment	<p>1774 comment by: <i>AESA - Agencia Estatal de Seguridad Aérea</i></p> <p>GENERAL</p> <p>Alternative means of compliance used by a competent authority or by organisations under its oversight may be used by other competent authorities or organisations only if <u>processed</u> again in accordance with ADR.AR.A.015 (d) and (e).</p> <p><i>Replace processed by proceed.</i></p>
response	<p>Not accepted</p> <p>'Processed' is meant.</p>
comment	<p>2077 comment by: <i>Infratil Airports Europe Ltd</i></p> <p>Page No: 2</p> <p>Paragraph No: GM1-ADR.AR.A.015</p> <p>Comment What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved?</p>
response	<p>Not accepted</p> <p>Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.</p>
comment	<p>2227 comment by: <i>Airport Operators Association</i></p> <p>GM1-ADR.AR.A.015 What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by</p>

	<p>competent authorities? Shouldn't they be applicable across the EU if approved?</p>
response	<p>Not accepted</p> <p>Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.</p>
comment	<p>2229 comment by: <i>Airport Operators Association</i></p> <p>GM2-ADR.OR.B.015(b) 1,2,3 AOA supports this proposal for the applicant to define the boundary of the certification area. It is important to not include inappropriate areas and this is a sensible proposal.</p>
response	<p>Noted</p> <p>Comment is not appropriately placed. It is meant to be on the OR side.</p>
comment	<p>2319 comment by: <i>Norwich International Airport</i></p> <p>GM1-ADR.AR.A.015</p> <p>What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved?</p>
response	<p>Not accepted</p> <p>Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.</p>
comment	<p>2331 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>Clarification required.</p> <p>Justification: What is meant by "only if processed again"? Does this mean AMCs can be selected by individual competent authorities? Shouldn't they be applicable across the EU if approved?</p>
response	<p>Not accepted</p> <p>Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by EASA to</p>

become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.

comment 2438 comment by: *London Biggin Hill Airport*
GM1.ADR.AR.A.015 What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved? clarification is required.

response Not accepted
Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.

comment 2629 comment by: *Fraport AG*
GM1-ADR.AR.A.015 — Means of compliance
Question
Alternative means of compliance used by a competent authority or by organisations under its oversight may be used by other competent authorities or organisations **only if processed again** in accordance with ADR.AR.A.015 (d) and (e).
Clarification for the meaning necessary.
Fraport AG
What is meant by "only if processed again"? Does this mean the Alternative MCs can be individually selected by competent authorities? Shouldn't they be applicable across the EU if approved?

response Not accepted
Accepted alternative means of compliance are indeed not applicable to all of European organisations. They would have to be adopted by EASA to become an Acceptable Means of Compliance to the Implementing Rule. So there is no automatic mutual recognition of alternative means of compliance from one country to another or one jurisdiction of competent authorities to another. This would not be appropriate because airport operations are highly diverse, so without being first looked at by the relevant competent authority of the aerodrome where they are intended to be used, it would not be safe to apply them.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART A – GENERAL REQUIREMENTS (ADR.AR.A) – AMC1-ADR.AR.A.030(d) – Immediate reaction to a safety problem

p. 3

comment

793

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- A. Explanatory Note - II. Process and scope (p5,6): note 2
- Draft Commission Regulation (p2-5): §12
- ANNEX I - Part-AR - ADR.AR.C.005 – Oversight (p23)
- ANNEX I - Part-AR - ADR.AR.C.050 – Declarations of providers of apron management services (p27-28)
- ANNEX I - Part AR - APPENDIX I (p32-33)
- ANNEX I - Part AR - APPENDIX II (p34-36)
- ANNEX II - Part-OR - ADR.OR.B.060 – Declaration of providers of apron management services (p43-44)
- ANNEX II - Part-OR - APPENDIX II (p61-62)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.A.030(d) – Immediate reaction to a safety problem (p3)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.C.005 – Oversight (p18)
- AMC/GM to ANNEX II – Part-OR – AMC2-ADR.OR.E.005 – Aerodrome manual (p109-114) – part E – 16

2. General comment

This comment is **critical**.

As it is said in the explanatory note (*II. Process and scope, note 2, pages 5-6*), the Agency did not undertake the development of safety rules for apron management services but later on will initiate a joint group with ATM. However, some procedural rules related to those services are included in the proposed rules.

DGAC considers it is essential to provide the flexibility needed to conduct further debates that will take place in the given joint group.

In particular, the connection between the aerodrome operator and providers of apron management service can not be established without further debates. Indeed, providers of apron management services, when existing, can be independent from the aerodrome operator, with arrangements between these two entities. For example in CDG airport, providers of apron management services are not subcontractors of the CDG operator. Moreover, there is a risk of inconsistency with what will be proposed by the joint group that will propose draft regulation on that point.

Therefore, the procedural rules included in the proposed implementing rules and corresponding AMC/GM shall remain at a high level stage only.

The provisions of the NPA that would consequently need to be revised are dealt with case by case in the proposed texts/comments below:

3. Justification and proposed texts / comments

This comment is linked with comment 23 in Explanatory note and 1033 in

book I.

· ADR.AR.C.005 — Oversight: Paragraph (a)(2)

DGAC understands the certification basis is not applicable to providers of apron management services, but it's not clear in paragraph (a)(2) of ADR.AR.C.005.

Providers of apron management services declare their compliance to applicable requirements only, thus the proposed change:

"(a) [...]"

(2) *continued compliance, with the certification basis and/or applicable requirements [...]"*

· ADR.AR.C.050 — Declarations of providers of apron management services

Considering what is said in the general comment just above and the fact that providers of apron management services are not subcontractors of the aerodrome operator, it would be inappropriate, when the competent authority has to notify something to the apron management services, to systematically notify it also to the aerodrome operator. Moreover, this could induce more delays to solve the problem as it could be understood that the corrective action is to be done by other entities.

Finally, as this is not a requirement, the wording "if required" should be replaced by "when deemed necessary".

Thus DGAC proposes to modify paragraph (b) of ADR.AR.C.050 as follows:

"If the declaration does not contain the required information, or contains information that indicates non-compliance with applicable requirements, the competent authority shall notify the provider of apron management services about the non-compliance and request further information. and If deemed necessary, the competent authority can address a copy of this notification to the aerodrome operator about the non-compliance and request further information. If required-deemed necessary, the competent authority shall carry out an inspection of the provider of apron management services and the aerodrome operator. If the non-compliance is confirmed, the competent authority shall take action as defined in ADR.AR.C.055 towards the apron management service"

· Part AR - APPENDIX I and APPENDIX II

The name of the provider of apron management service should not be part of the certificate of the aerodrome operator because they can be independent.

APPENDIX I

"[...]"

TERMS OF APPROVAL	
<i>Provision of apron management services:</i>	<i>Specify name of service provider</i>

[...]"

APPENDIX II

"[...]"

Apron management services are provided by [specify name of service provider].

[...]"

· ADR.OR.B.060 — Declaration of providers of apron management

services

Paragraph (a): DGAC doesn't understand the pertinence of having an agreement with an aerodrome operator.

"(a) The provider of apron management services, following an agreement with an aerodrome operator for the provision of such services at an aerodrome, shall:"

Paragraph (a)(5): DGAC finds this provision goes too far. Moreover, nobody will verify that the provider of apron management service complies with the aerodrome manual; in particular it's absolutely not the aerodrome operator's task.

"(5) provide its services in accordance with the aerodrome manual and comply with all relevant provisions contained therein"

Paragraph (b): DGAC doesn't understand the pertinence of notifying the aerodrome operator when ceasing activity.

"(b) Before ceasing the provision of such services, the provider of apron management services shall notify the competent authority and the aerodrome operator."

· Part-OR - APPENDIX II

In order to be clearer, DGAC proposes to clarify that these declarations of the providers of apron management services are declarations "of compliance" (see the proposed titles below).

Moreover, it is essential to delete "The service is provided in accordance with the content of the relevant aerodrome manual" as this is absolutely not high level and as it may induce a risk of inconstancy with the future rules on apron management services.

"Appendix II to Annex II

Declaration of compliance

In accordance with Commission Regulation (EC) No XXX/2013 laying down requirements and procedures related to aerodromes pursuant to Regulation (EC) No 216/ 2008 of the European Parliament and of the Council

[...]

~~ð The service is provided in accordance with the content of the relevant aerodrome manual.~~

[...]

ð (If applicable) The operator has implemented and demonstrated conformance to an officially recognised industry standard.

Reference of the standard: Certification body:

Date of the last conformance audit:

[...]

· AMC1-ADR.AR.A.030(d) — Immediate reaction to a safety problem

AMC1-ADR.AR.A.030(d) is to be deleted:

~~**"AMC1-ADR.AR.A.030(d) — Immediate reaction to a safety problem NOTIFICATION OF MEASURES**~~

~~*In case that the competent authority directs a measure to a provider apron management services, then these measures should also be notified to the aerodrome operator."*~~

· AMC1-ADR.AR.C.005 — Oversight

High level provisions in this NPA state that apron management services shall provide a declaration to the competent authority when appropriate. But the oversight of the "continued competence" goes beyond this statement and therefore merits further debates.

Moreover, the word "qualified" should be avoided considering it is referring to very specific terminology laid down in directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions.

Thus the following proposed changes to this AMC:

AMC1-ADR.AR.C.005 – Oversight

"GENERAL

(a) The competent authority should assess the aerodrome operator and monitor its continued competence to conduct safe operations in compliance with the applicable requirements and the certification basis. ~~Similarly, the competent authority should monitor the continued competence of providers of apron management services. The competent authority should ensure that accountability for assessing and monitoring aerodrome operators as well as providers apron management services is clearly defined. This accountability may be delegated or shared, in whole or in part.~~

(b) ~~It is essential that the competent authority~~ shall have the full capability to adequately assess the continued competence of an aerodrome operator ~~or a provider of apron management services by ensuring that the whole range of activities is assessed by appropriately qualified trained personnel.~~

· **AMC2-ADR.OR.E.005 – Aerodrome manual**

AMC2-ADR.OR.E.005 includes in the aerodrome manual the procedures for apron management. This is not high level provision and strongly needs further debates, because the relevancy of having apron management procedures in the aerodrome manual is not proven.

For instance, it is possible to imagine a system where the providers of apron management service have their own procedures and the aerodrome operator has nothing to do with them. Chapter 16 of part E of the structure of the aerodrome manual is to be deleted.

Note: DGAC also proposes to put the content of this AMC to GM because of the high level of details that doesn't fit to all organization. See comment xx.

"AMC2GM1-ADR.OR.E.00510 – Structure of aerodrome manual

[...]

~~16. Procedures for apron management including:~~

~~16.1 transfer of the aircraft between air traffic control and the apron management unit;~~

~~16.2 allocation of aircraft parking positions;~~

~~16.3 engine start and aircraft push-back;~~

~~16.4 marshalling and follow-me service.~~

[...]"

response

Not accepted

The Agency has decided to provide all administrative rules needed for the oversight of declared organisations, i.e. apron management services (if such an oversight regime is chosen by the competent authority).

Furthermore, it was the expressed wish by the experts that the airport is informed of any safety measures addressed to the apron management service provider.

comment 863 comment by: *NATS National Air Traffic Services Limited*

This is incorrect grammar "In case that the competent authority directs a measure to a provider apron Management.." Suggest the text is amended to read "In the case where the competent authority directs a measure to a provider of apron management.."

response Accepted

A more efficient wording has been used.

comment 1495 comment by: *ECA - European Cockpit Association*

Change as follows:

In ~~case the event~~ that the competent authority directs a measure to a provider **of** apron management.

Justification:

Editorial comment.

response Accepted

A more efficient wording has been used.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART A – GENERAL REQUIREMENTS (ADR.AR.A) – GM1-ADR.AR.A.040 – Safety Directives

p. 3

comment 8 comment by: *airsight GmbH*

Example (a) states the requirement to forward to EASA the necessity to include additional CS in the CB of an ADR.

This example should be deleted if the intention is to receive only essential safety relevant information, as

- ADR.AR.C.20 does not require to transmit a CB in general
- changes to CB could occur for regular reasons (development, extension, construction)
- ADR.AR.A.15 and ADR.AR.A.20 and ADR.AR.A.25 fully covers the range of notification of AltMoC, ELoS, SC, ...

response *Accepted*

The example may, indeed, be not appropriate as the ordering of new CS to be integrated into the CB may be too frequent. The text was changed.

comment 72 comment by: *CAA Norway*

	<p>GM1-ADR.AR.A.040 should be elevated to AMC and the fact that there are 5 types of directives that need to be reported to the Agency should be better reflected in the IR itself. We also suggest to reword and put "should" instead of "need to".</p>
response	<p>Accepted</p> <p>The text was changed.</p>
comment	<p>372 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>GM1-ADR.AR.A.040 should be elevated to AMC and the fact that there are 5 types of directives that need to be reported to the Agency should be better reflected in the IR itself. We also suggest to reword and put "should" instead of "need to".</p>
response	<p>Accepted</p> <p>The text was changed.</p>
comment	<p>384 comment by: <i>Estonian CAA</i></p> <p>"GM1-ADR.AR.A.040 should be elevated to AMC and the fact that there are 5 types of directives that need to be reported to the Agency should be better reflected in the IR itself. We also suggest to reword and put ""should"" instead of ""need to"". "</p>
response	<p>Accepted</p> <p>The text was changed.</p>
comment	<p>625 comment by: <i>Finnish Transport Safety Agency</i></p> <p>GM1-ADR.AR.A.040 should be elevated to AMC and the fact that there are 5 types of directives that need to be reported to the Agency should be better reflected in the IR itself. We also suggest to reword and put "should" instead of "need to".</p>
response	<p>Accepted</p> <p>The text was changed.</p>
comment	<p>865 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p><u>2 comments</u></p> <p>1. In the second paragraph the text does not flow into (a) in a meaningful way. Suggest amend (a) to begin "that it is necessary to include additional..."</p> <p>2. The text obliges ("need") the Member State to send safety directives to the Agency and cannot therefore be considered to be GM. Suggest elevate to AMC.</p>

response Partially accepted

1. Agreed. The text was changed.

2. Partially agreed. The text was changed. The GM status was, however, retained.

comment 1111 comment by: Danish Transport Authority

GM1-ADR.AR.A.040 should be elevated to AMC and the fact that there are 5 types of directives that need to be reported to the Agency should be better reflected in the IR itself. We also suggest to reword and put "should" instead of "need to".

response Accepted

Text was changed.

comment 1210 comment by: UK CAA

Page No: 3

Paragraph No: GM1-ADR.AR.A.040

Comment: The GM refers to safety directives "which may be called operational directives or otherwise" of a sort which need not be forwarded to the Agency. But if it is a safety directive, the rule requires a copy be sent to the Agency. Given the exclusive legal competence of the EU in this field, how can a national authority have additional powers to issue a different type of directive to aerodrome operators?

Justification: The GM on safety directives is rather confusing.

Proposed Text: REPLACE the first paragraph with: "Safety directives should not be confused with other operational information, which may be called operational directives, notices or otherwise, that the competent authority might need to issue. Such publications need not be forwarded to the agency".

response Accepted

The text was made clearer.

comment 1402 comment by: Swedish Transport Agency

GM1-ADR.AR.A.040 should be elevated to AMC and the fact that there are 5 types of directives that need to be reported to the Agency should be better reflected in the IR itself. We also suggest to reword and put "should" instead of "need to".

response Accepted

The text was changed.

comment 1776 comment by: AESA - Agencia Estatal de Seguridad Aérea

	(a) necessary to include additional certification specifications in the <u>certification asis</u> of an aerodrome; <i>It's certification basis.</i>
response	Accepted Yes, but this example was dropped as it occurs too frequently.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – AMC1-ADR.AR.B.005(a) – Management system	p. 4
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comment	866 comment by: <i>NATS National Air Traffic Services Limited</i> GM1-ADR.AR.B.005(a) - (a), (b), (c), (d) & (e) - Each of these has a "should" in them thus implying that they are AMC rather than GM. Suggest rewriting removing "should".
response	Not accepted It is the legal instrument that determines the legal value of a measure not the words themselves. The word should suit the purpose.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – AMC1-ADR.AR.B.005(a)(1) – Management system	p. 5
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comment	73 comment by: <i>CAA Norway</i> Editorial: We suggest to reverse the order of hierarchy in AMC1-ADR.AR.B.005 (a)(1), (c)(4) (processes and procedures) as procedures are parts of processes.
response	Accepted It is suggested to mention under (c)(4) the processes first, and the procedures second. The text was changed.

comment	74 comment by: <i>CAA Norway</i> We suggest to insert in AMC1-ADR.AR.B.005 (a)(1), (c) on page 5 " The documented policies and procedures should cover... "
response	Accepted

	The text was changed.
comment	75 comment by: <i>CAA Norway</i> Wording in AMC1-ADR.AR.B.005 (a)(1), (d) on page 5 should be: " ... procedures and detailed work instructions. "
response	Partially accepted We have chosen the word procedures in the title, and, therefore, do not want to introduce a different term 'work instructions' although they mean virtually the same.
comment	373 comment by: <i>Icelandic Civil Aviation Administration</i> AMC1-ADR.AR.B.005 (a)(1) (c) (1, 2 and 3) - These first 3 numericals in the list from 1 - 9 are not procedural in nature, they are descriptions and statements. Procedures are not applied to them. Documented procedures should therefore not cover them.
response	Not accepted With the change to say in (c) 'The documented policies and procedures should cover...', it is now consistent with enumerate policies, organisational structure and responsibilities, and associated authority.
comment	374 comment by: <i>Icelandic Civil Aviation Administration</i> Editorial: We suggest to reverse the order of hierarchy in AMC1-ADR.AR.B.005 (a)(1) (c)(4) (processes and procedures) as procedures are parts of processes.
response	<i>Accepted</i> It is suggested to mention under (c)(4) the processes first and the procedures second. The text was changed.
comment	375 comment by: <i>Icelandic Civil Aviation Administration</i> We suggest to insert in AMC1-ADR.AR.B.005 (a)(1), (c) on page 5 "The documented policies and procedures should cover..."
response	Accepted The text was changed.
comment	376 comment by: <i>Icelandic Civil Aviation Administration</i> Wording in AMC1-ADR.AR.B.005 (a)(1), (d) on page 5 should be: " ... procedures and detailed work instructions. "
response	Partially accepted We have chosen the word 'procedures' in the title, and, therefore, do not want to introduce a different term 'work instructions' although they mean

virtually the same.

comment 385 comment by: *Estonian CAA*
"Editorial:
We suggest to reverse the order of hierarchy in AMC1-ADR.AR.B.005 (a)(1) (c)(4) (processes and procedures) as procedures are parts of processes."

response *Accepted*
It is suggested to mention under (c)(4) the processes first, and the procedures second. The text was changed.

comment 388 comment by: *Estonian CAA*
Wording in AMC1-ADR.AR.B.005 (a)(1), (d) on page 5 should be: "... procedures and detailed work instructions."

response Partially accepted
We have chosen the word 'procedures' in the title, and, therefore, do not want to introduce a different term 'work instructions' although they mean virtually the same.

comment 389 comment by: *Estonian CAA*
We suggest to insert in AMC1-ADR.AR.B.005 (a)(1), (c) on page 5 "The documented policies and procedures should cover..."

response Accepted
The text was changed.

comment 630 comment by: *Finnish Transport Safety Agency*
Editorial:
We suggest to reverse the order of hierarchy in AMC1-ADR.AR.B.005 (a)(1) (c)(4) (processes and procedures) as procedures are parts of processes.

response *Accepted*
It is suggested to mention under (c)(4) the processes first, and the procedures second. The text was changed.

comment 631 comment by: *Finnish Transport Safety Agency*
We suggest to insert in AMC1-ADR.AR.B.005 (a)(1), (c) on page 5 "The documented policies and procedures should cover..."

response Accepted

The text was changed.

comment 1114 comment by: *Federal Office of Civil Aviation FOCA*
AMC1-ADR.AR.B.005 (a)(1), (d): Please change wording to: "... procedures and detailed work instructions."

response Partially accepted
We have chosen the word 'procedures' in the title, and, therefore, do not want to introduce a different term 'work instructions' although they mean virtually the same.

comment 1403 comment by: *Swedish Transport Agency*
Editorial:
We suggest to reverse the order of hierarchy in AMC1-ADR.AR.B.005 (a)(1) (c)(4) (processes and procedures) as procedures are parts of processes.

response Accepted
It is suggested to mention under (c)(4) the processes first, and the procedures second. The text was changed.

comment 1404 comment by: *Swedish Transport Agency*
AMC1-ADR.AR.B.005 (a)(1) (c) (4). We suggest to insert in AMC1-ADR.AR.B.005 (a)(1), (c) on page 5 "The documented policies and procedures should cover..."

response Accepted
The text was changed.

comment 1405 comment by: *Swedish Transport Agency*
Wording in AMC1-ADR.AR.B.005 (a)(1), (d) on page 5 should be: "... procedures and detailed work instructions."

response Partially accepted
We have chosen the word 'procedures' in the title, and, therefore, do not want to introduce a different term 'work instructions' although they mean virtually the same.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – AMC1-ADR.AR.B.005(a)(2) – Management system p. 6-7

comment 76 comment by: *CAA Norway*
We suggest to delete the last sentence in AMC1-ADR.AR.B.005 (a)(2), (c)

	on page 6. We do not agree that trainees need to complete theoretical training before they attend on-the-job training. And of course they will do this under supervision.
response	Partially accepted. Requirement related to time sequence of particular components of initial training is moved to GM.
comment	77 comment by: <i>CAA Norway</i> We strongly disagree in the timeframe set out in AMC1-ADR.AR.B. 005 (a)(2), (g)(2) on page 7. The appointee can be very well qualified as an instructor even if he/she has not performed a certain number of inspections through the past 36 months. We suggest the time frames to be removed or extended. Editorial: Wrong reference. Cannot be found in AMC4-ADR.AR.B.005. Should be AMC3-ADR.AR.B.005.
response	Not accepted The Agency believes the requirement in AMC1-ADR.AR.B.005(a)(2) under (g) (2) can be deleted as (g)(1) already states that the appointee should be a qualified aerodrome inspector as per AMC3-ADR.AR.B.005(a)(2) which requires aerodrome inspectors to have done two aerodrome audits/inspections per 12 months in order to remain qualified. The Agency believes that the same should apply for an appointee that gives trainings and assesses trainees. Agreed. The reference is wrong.
comment	246 comment by: <i>CAA Norway</i> The theoretical training in AMC1-ADR.AR.B.005(a)(2), (a), should also cover Audits and inspections training and quality assurance (audits) theory. This is important and cannot be skipped.
response	Accepted The AMC was changed to include these elements.
comment	377 comment by: <i>Icelandic Civil Aviation Administration</i> The theoretical training in AMC1-ADR.AR.B.005(a)(2), (a), should also cover Audits and inspections training and quality assurance (audits) theory. This is extensive and important and cannot be skipped.
response	Accepted The AMC was changed to include these elements.
comment	378 comment by: <i>Icelandic Civil Aviation Administration</i> We suggest to delete the last sentence in AMC1-ADR.AR.B.005 (a)(2), (c)

	<p>on page 6. We do not agree that trainees need to complete theoretical training before they attend on-the-job training. And of course they will do this under supervision.</p>
response	<p>Partially accepted.</p> <p>Requirement related to time sequence of particular components of initial training is moved to GM.</p>
comment	<p>379 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>We strongly disagree in the timeframe set out in AMC1-ADR.AR.B. 005 (a)(2), (g)(2) on page 7. The appointee can be very well qualified as an instructor even if he/she has not performed a certain number of inspections through the past 36 months. We suggest the time frames to be removed or extended. Editorial: Wrong reference. Cannot be found in AMC4-ADR.AR.B.005. Should be AMC3-ADR.AR.B.005.</p>
response	<p><i>Not accepted</i></p> <p>The Agency believes the requirement in AMC1-ADR.AR.B.005(a)(2) under (g) (2) can be deleted as (g)(1) already states that the appointee should be a qualified aerodrome inspector as per AMC3-ADR.AR.B.005(a)(2) which requires aerodrome inspectors to have done two aerodrome audits/inspections per 12 months in order to remain qualified. The Agency believes that the same should apply for an appointee that gives trainings and assesses trainees.</p> <p>Agreed. The reference is wrong.</p>
comment	<p>391 comment by: <i>Estonian CAA</i></p> <p>The theoretical training in AMC1-ADR.AR.B.005(a)(2), (a), should also cover Audits and inspections training and quality assurance (audits) theory. This is important and cannot be skipped.</p>
response	<p>Accepted</p> <p>The AMC was changed to include these elements.</p>
comment	<p>392 comment by: <i>Estonian CAA</i></p> <p>"We suggest to delete the last sentence in AMC1-ADR.AR.B.005 (a)(2), (c) on page 6. We do not agree that trainees need to complete theoretical training before they attend on-the-job training. And of course they will do this under supervision."</p>
response	<p>Partially accepted</p> <p>Requirement related to time sequence of particular components of initial training is moved to GM.</p>

comment	632 comment by: <i>Finnish Transport Safety Agency</i> The theoretical training in AMC1-ADR.AR.B.005(a)(2), (a), should also cover Audits and inspections training and quality assurance (audits) theory. This is important and cannot be skipped.
response	Accepted The AMC was changed to include these elements.
comment	633 comment by: <i>Finnish Transport Safety Agency</i> We suggest to delete the last sentence in AMC1-ADR.AR.B.005 (a)(2), (c) on page 6. We do not agree that trainees need to complete theoretical training before they attend on-the-job training. And of course they will do this under supervision.
response	Partially accepted Requirement related to time sequence of particular components of initial training is moved to GM.
comment	634 comment by: <i>Finnish Transport Safety Agency</i> We strongly disagree in the timeframe set out in AMC1-ADR.AR.B. 005 (a)(2), (g)(2) on page 7. The appointee can be very well qualified as an instructor even if he/she has not performed a certain number of inspections through the past 36 months. We suggest the time frames to be removed or extended. Editorial: Wrong reference. Cannot be found in AMC4-ADR.AR.B.005. Should be AMC3-ADR.AR.B.005.
response	Not accepted The Agency believes the requirement in AMC1-ADR.AR.B.005(a)(2) under (g) (2) can be deleted as (g)(1) already states that the appointee should be a qualified aerodrome inspector as per AMC3-ADR.AR.B.005(a)(2) which requires aerodrome inspectors to have done two aerodrome audits/inspections per 12 months in order to remain qualified. The Agency believes that the same should apply for an appointee that gives trainings and assesses trainees. Agreed. The reference is wrong.
comment	868 comment by: <i>NATS National Air Traffic Services Limited</i> There are four AMC to ADR.AR.B.005(a)(2) which are not four different ways of satisfying the IR, rather all four must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merge the four AMC into a single AMC.
response	<i>Not accepted</i>

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

As this comment appears many times in the subsequent comments to AMCs and GMs by your organisation, the Agency will form now on 'note' the comment.

comment *1112* comment by: *Danish Transport Authority*

The last sentence in AMC1-ADR.AR.B.005 (a)(2), (c). The requirement of completing theoretical training before they attend on-the-job training should be GM. Its should be an individual assessment of the trainee that determines how and when the next should be covered.

response Accepted

Requirement related to time sequence of particular components of initial training is moved to GM.

comment *1113* comment by: *Danish Transport Authority*

(g)(2):
The timeframe set out in AMC1-ADR.AR.B. 005 (a)(2), (g)(2) on page 7. The appointee can be very well qualified as an instructor even if he/she has not performed a certain number of inspections through the past 36 months. We suggest the time frames to be removed or extended. Editorial: Reference cannot be found in AMC4-ADR.AR.B.005. Properly AMC3-ADR.AR.B.005.

response Not accepted

The Agency believes the requirement in AMC1-ADR.AR.B.005(a)(2) under (g) (2) can be deleted as (g)(1) already states that the appointee should be a qualified aerodrome inspector as per AMC3-ADR.AR.B.005(a)(2), which requires aerodrome inspectors to have done two aerodrome audits/ inspections per 12 months in order to remain qualified. The Agency believes that the same should apply for an appointee that gives trainings and assesses trainees.

Agreed. The reference is wrong.

comment *1137* comment by: *Federal Office of Civil Aviation FOCA*

AMC1-ADR.AR.B.005(a) (2)(b): Audits and inspections training. This should also be covered in the theoretical training in (b), quality assurance (audits) theory is extensive and cannot be omitted. Please put this comment to (a) instead.

AMC1-ADR.AR.B.005(a) (2)(c): FOCA does not agree that trainees need to complete theoretical training before they attend on-the-job training. Naturally they will do this under supervision. FOCA suggests to delete the last sentence in para (c).

response *Accepted*

(b): Agreed. The AMC was changed to include these elements

(c): Partially accepted. Requirement related to time sequence of particular components of initial training is moved to GM.

comment

1151

comment by: *Federal Office of Civil Aviation FOCA*

AMC1-ADR.AR.B. 005 (a)(2), (g)(2): FOCA strongly disagrees with this timeframe. The appointee can be very well qualified as an instructor even if he/she has not performed a certain number of inspections over the past 36 months. Cannot be found in AMC4-ADR.AR.B.005. Wrong reference? FOCA suggests to remove the timeframes.

response

Not accepted

The Agency believes the requirement in AMC1-ADR.AR.B.005(a)(2) under (g) (2) can be deleted as (g)(1) already states that the appointee should be a qualified aerodrome inspector as per AMC3-ADR.AR.B.005(a)(2), which requires aerodrome inspectors to have done two aerodrome audits/inspections per 12 months in order to remain qualified. The Agency believes that the same should apply for an appointee that gives trainings and assesses trainees.

Agreed. The reference is wrong.

comment

1213

comment by: *UK CAA*

Page No: 7

Paragraph No: AMC1-ADR.AR.B.005(a)(2) (g)

Comment: The inclusion of specific qualifications for aerodrome inspectors providing training and assessing trainees is too prescriptive. It should be left to the competent authority to develop the suitable qualifications needed for the post. Therefore, items (1) & (2) should be deleted along with the introductory phrase in para (g).

Justification: To place a time limit and number of inspections against an ability to undertake the role does not signify competence. Qualifications needed by a person to undertake the role should be left to the discretion of the competent authorities. They are best placed to make this assessment based on the character and ability of an individual to meet the criteria.

Proposed Text:

(g) Aerodrome inspectors providing training and assessing trainees

The aerodrome inspectors providing the training and assessing **of** trainee aerodrome inspectors should be appointed by the competent authority and should meet the qualification criteria established by that competent authority.

[DELETE: "which should contain at least the following requirements:
DELETE (1) and (2)]

Additional factors to be considered when nominating aerodrome inspectors to provide training and assess trainee aerodrome inspectors include:

knowledge of training techniques, professionalism, maturity, **judgement**, integrity, safety awareness, communication skills, personal standards of performance.

response Not accepted

(g) (1) and (2): Not agreed. The Agency believes that the required skill level of three years of being a qualified aerodrome inspector before being able to be appointed as assessor and trainer, is appropriate. The AMC has, however, been made simpler. (2) was deleted to show more clearly that such appointees must be qualified inspectors as all the other inspectors.

Concerning the proposed text change: Noted. The criteria for the selection of trainers can, indeed, also include the additional factors described in the comment. EASA gives this flexibility to add criteria.

comment 1275 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.B.005(a)(2) — Management system (page 6 – 7)

2. Justification and proposed text / comment

In AMC1-ADR.AR.B.005(a)(2) :

- the on-the-job training should address the "team leading" only if the oversight staff trained to be an auditor will be a team leader : it is proposed to add "if relevant".
- (d) and (e) should be subparts from (c).
- In paragraph (8) : the post audit procedures can be done by someone else than the auditor (for instance another auditor, who did not perform THIS audit, or someone in charge of oversight activities) : it is proposed to add "if relevant".

Consequently, it is proposed to modify AMC1-ADR.AR.B.005(a)(2) as follows :

"AMC1-ADR.AR.B.005(a)(2) – Management System
 SCOPE AND DURATION OF INITIAL TRAINING OF AERODROME INSPECTORS

(a) [...]

(c) On-the-job training

[...]

~~(d)~~(c1) Duration and conduct of on-the-job training

[...]

~~(e)~~(c2) Elements to be covered during the on-the-job training

[...]

(7) Team leading , if relevant

(8) Post-audit/inspection procedures [...] after appropriate action has been taken by the aerodrome operator, if relevant.

response Partially accepted

- 'team leading': Agreed. The text was changed accordingly.
- Order of items: Agreed. The text will be changed.
- Item (8): Not agreed. This is the list of training items which should

also cover post-audit follow-up for all inspectors. The Agency believes that the auditor doing the audit should be the one following-up on audit results.

Please note that the Agency has its own conventions for numbering and listings.

comment 1406 comment by: *Swedish Transport Agency*

The theoretical training in AMC1-ADR.AR.B.005(a)(2), (a), should also cover iAudits and inspections training and quality assurance (audits) theory. This is extensive and cannot be skipped.

response Accepted

The AMC was changed to include these elements.

comment 1407 comment by: *Swedish Transport Agency*

We suggest to delete the last sentence in AMC1-ADR.AR.B.005 (c) on page 6. We do not agree that trainees need to complete theoretical training before they attend on-the-job training. And of course they will do this under supervision.

response Partially accepted

Requirement related to time sequence of particular components of initial training is moved to GM.

comment 1408 comment by: *Swedish Transport Agency*

We strongly disagree in the timeframe set out in AMC1-ADR.AR.B. 005 (a)(2), (g)(2) on page 7. The appointee can be very well qualified as an instructor even if he/she has not performed a certain number of inspections through the past 36 months. We suggest the time frames to be removed or extended.
Editorial: Wrong reference. Cannot be found in AMC4-ADR.AR.B.005. Should be AMC3-ADR.AR.B.005.

response Not accepted

The Agency believes the requirement in AMC1-ADR.AR.B.005(a)(2) under (g) (2) can be deleted as (g)(1) already states that the appointee should be a qualified aerodrome inspector as per AMC3-ADR.AR.B.005(a)(2) which requires aerodrome inspectors to have done two aerodrome audits/ inspections per 12 months in order to remain qualified. The Agency believes that the same should apply for an appointee that gives trainings and assesses trainees.

Agreed. The reference is wrong.

comment 1777 comment by: *AESA - Agencia Estatal de Seguridad Aérea*

1. Page 6/176 -(d)
Duration and conduct of the OJT

*"The OJT includes at least **2 aerodrome audits/inspections***

- In one of the findings of USOAP audit carried out to Spain in 2010 AESA was required to increase the number of required OJTs, which had been established to be 2. From 2010 onwards, we updated our procedure to request at least 4.

- There should be common understanding of how much effort imply the terms "audit" and "inspection". It is not clear, taking into account the definitions.

- It should be clarified whether this "audits" or "inspections" must be on site audits or can be documental. It seems reasonable that in most cases it should be only "on site" audits, but it should be considered the possibility to take into account on desk auditing experience (at least 20%-25% of the total)

1. Page 7/176 -(g) - (1)
Aerodrome inspectors providing training and assessing trainees

"The appointee has been a qualified aerodrome inspector over the 3 years..."

3 years seems to be quite demanding.

We suggest requesting 2 years, since we consider that it is enough time for to achieve a proper skill to instruct others.

1. *Pag7/176 - (g)-(2)*
the appointee has performed the required number of inspections during the last thirty-six month prior to his appointment, in accordance with AMC4-ADR.AR.B.005.

Code AMC4-ADR.AR.B.005 doesn't exist.

response

Partially accepted

(d) Agreed. The Agency also believes that the on-the-job training should include, at least, four aerodrome audits/ inspections, and has changed the AMC text accordingly.

(d) The duration of an audit/ inspection has to do with the complexity of the organisation and aerodrome. It should take as long as is needed.

(d) As per the definition given for inspection below:

'Inspection' means an independent documented conformity evaluation by observation and judgement accompanied, as appropriate, by measurement, testing, or gauging in order to verify compliance with applicable requirements.

The Agency believes that inspection is always the practical aspect of the verification of compliance with the requirements. Therefore, the inspection

can be considered the on-site aspect of the audit.

(g) (1) and (2): Not agreed. The Agency believes that the required skill level of three years of being a qualified aerodrome inspector before being able to be appointed as assessor and trainer, is appropriate. The AMC has, however, been made simpler. (2) was deleted to show more clearly that such appointees must be qualified inspectors as all the other inspectors.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – p. 7-8
AMC2-ADR.AR.B.005(a)(2) – Management system**

comment 394 comment by: *Estonian CAA*

We strongly disagree in the timeframe set out in AMC1-ADR.AR.B. 005 (a)(2), (g)(2) on page 7. The appointee can be very well qualified as an instructor even if he/she has not performed a certain number of inspections through the past 36 months. We suggest the time frames to be removed or extended.
Editorial: Wrong reference. Cannot be found in AMC4-ADR.AR.B.005. Should be AMC3-ADR.AR.B.005.

response Not accepted

The Agency believes the requirement in AMC1-ADR.AR.B.005(a)(2) under (g) (2) can be deleted as (g)(1) already states that the appointee should be a qualified aerodrome inspector as per AMC3-ADR.AR.B.005(a)(2) which requires aerodrome inspectors to have done two aerodrome audits/inspections per 12 months in order to remain qualified. The Agency believes that the same should apply for an appointee that gives trainings and assesses trainees.

Agreed. The reference is wrong.

comment 873 comment by: *NATS National Air Traffic Services Limited*

There are four AMC to ADR.AR.B.005(a)(2) which are not four different ways of satisfying the IR, rather all four must be complied with in order to satisfy the IR. This is contrary to previous The Agency drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance?

Suggest merge the four AMC into a single AMC.

response *Noted*

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment 1215 comment by: *UK CAA*

Page No: 8

Paragraph No: AMC2-ADR.AR.B.005(a)(2) (b)

Comment: Para (b) should be deleted in total.

Justification: It is seriously flawed by indicating an aerodrome inspector's competencies are driven by background knowledge and working experience. This undermines the quality of training given by the NAA (that should address all background weaknesses). The objective of the paragraph may only be applied if different classes of inspectors are required (e.g. small ADRs team), however, in this case, this would drive the length and content of training. If this should be the case, then the paragraph needs rewording to clarify that intent.

Proposed Text: DELETE AMC2-ADR.AR.B.005(a)(2) (b) or re-word according to justification.

response

Noted

The intent of the AMC is not to imply that different categories of inspectors should exist. The competent authority may, indeed, give all types of privileges to an inspector provided that he/she has the necessary knowledge and competence. On the other hand, nothing prevents a competent authority from establishing different specialisations within its aerodrome inspectorate force (RFFS inspectors, operations inspectors ect).

comment

1502

comment by: *ECA - European Cockpit Association*

Change as follows:

QUALIFICATION OF AERODROME INSPECTORS AFTER SUCCESSFUL COMPLETION OF TRAINING

(a) Upon the successful completion of the initial training (initial theoretical training; practical training and on-the-job training) the competent authority should issue a formal qualification statement for each qualified aerodrome inspector listing **its their** privileges. The aerodrome inspectors should also be issued credentials, to facilitate their work.

Jus Justification:

Editorial comment.

response

Accepted

The text was changed.

comment

1503

comment by: *ECA - European Cockpit Association*

Change as follows:

QUALIFICATION OF AERODROME INSPECTORS AFTER SUCCESSFUL COMPLETION OF TRAINING

(b) The background knowledge and/or working experience of the aerodrome inspector determines **its their** privileges (the scope of his/her inspection; what he/she is entitled to inspect). The competent authority should determine what the inspector is entitled to inspect taking into

	<p>account the following considerations:</p> <p>Justification: Editorial comment.</p>
response	<p>Accepted</p> <p>The text was changed.</p>
comment	<p>1782 comment by: <i>AESA - Agencia Estatal de Seguridad Aérea</i></p> <p>Page 8/176 -(b)</p> <p><i>"The background knowledge and/or working experience of the aerodrome inspector determines its priveleges....)"</i></p> <p>Background knowledge and working experience should be taking into account and be recognized in order to reduce the requirements to achieve the qualification, in the cases that it is reasonable.</p> <p>For instance, if a person has been carrying out audits of aerodromes for five years, as a member of a qualified entity or equivalent, the requirements for this person to achieve the qualification (to become an inspector or even a team leader) should be far less than for another profile with less experience.</p> <p>The privileges that an inspector might hold should also depend on the training within the competent authority</p>
response	<p>Noted</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – AMC3-ADR.AR.B.005(a)(2) – Management system</p>	<p>p. 8</p>
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comment	<p>247 comment by: <i>CAA Norway</i></p> <p>We strongly disagree in the timeframes set out in AMC3-ADR.AR.B.005 (a)(2) on page 8 and suggest to delete this AMC. It is far too limiting. Alternatively double the times, so that in (a) it would be 24 months, in (b) it would be 6 months, (c) and (d) would be 48 months.</p>
response	<p>Accepted.</p> <p><u>AMC is moved to GM.</u></p>
comment	<p>380 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>We strongly disagree in the timeframes set out in AMC3-ADR.AR.B.005 (a)(2) on page 8 and suggest to delete this AMC. It is far too limiting. Alternatively double the times, so that in (a) it would be 24 months, in (b) it would be 6 months, (c) and (d) would be 48 months.</p>

response Accepted
[AMC is moved to GM.](#)

comment 395 comment by: *Estonian CAA*

We strongly disagree in the timeframes set out in AMC3-ADR.AR.B.005 (a)(2) on page 8 and suggest to delete this AMC. It is far too limiting. Alternatively double the times, so that in (a) it would be 24 months, in (b) it would be 6 months, (c) and (d) would be 48 months.

response Accepted
[AMC is moved to GM.](#)

comment 635 comment by: *Finnish Transport Safety Agency*

We strongly disagree in the timeframes set out in AMC3-ADR.AR.B.005 (a)(2) on page 8 and suggest to delete this AMC. It is far too limiting. Alternatively double the times, so that in (a) it would be 24 months, in (b) it would be 6 months, (c) and (d) would be 48 months.

response Accepted
[AMC is moved to GM.](#)

comment 874 comment by: *NATS National Air Traffic Services Limited*

There are four AMC to ADR.AR.B.005(a)(2) which are not four different ways of satisfying the IR, rather all four must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance?

Suggest merging the four AMC into a single AMC.

response Noted

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment 1115 comment by: *Danish Transport Authority*

The recurrent training needed after loss of qualification should be individual assessed by the competent authority. Previous experience by the aerodrome inspector should be credited in some way. Inspectors within the competent authority covers a vast spectra of areas, especially regulation framework that doesn't include field inspections/audits. Simple timeframes and number of inspections gives some kind of indication of the inspectors experience but does not give a real assessment of the aerodrome inspectors qualifications.

response Noted

[AMC is moved to GM.](#)

comment	1154	comment by: <i>Federal Office of Civil Aviation FOCA</i>
	We strongly disagree with these timeframes. We suggest deleting this AMC as it is far too limiting. Alternatively, please consider doubling the times, which would result in (a) to 24 months, in (b) to 6 months, (c) and (d) to 48 months.	
response	Accepted	
	AMC is moved to GM.	

comment	1276	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none">• AMC/GM to ANNEX I — Part-AR — AMC3-ADR.AR.B.005(a)(2) — Management system (p8)	
	<u>2. Justification and proposed text / comment</u>	
	In AMC3-ADR.AR.B.005(a)(2), "Performing the number of the missed audits under the supervision of a qualified inspectors" is unrealistic and unefficient because one supervised audit may be sufficient to prove that the inspector is still qualified enough to conduct audits by himself. Therefore DGAC proposes: "(b) If an aerodrome inspector loses his/her qualification as a result of not reaching the minimum number of inspections mentioned in paragraph (a), he/she may be re-qualified by the competent authority by performing the number of the missed audits/inspections deemed necessary by the competent authority, but now below one, under the supervision of a qualified aerodrome inspector. The missed audits/inspections should take place within a maximum period of 3 months following the end of the period within which he/she should have reached the minimum number of audits/inspections. "	
	In paragraph (c), it's not clear what "paragraph 2" refers to. DGAC presumes the reference is paragraph (a) of the same AMC: "(c) If an aerodrome inspector loses his/her qualification because he/she has not been engaged in performing audits/inspections for a period larger than that established in paragraph 2 (a) but less than 24 months, he/she should be re-qualified by the competent authority only after successfully completing on-the-job-training and any recurrent training required."	
response	Partially accepted	
	(b): Noted. AMC is moved to GM. (c): Agreed. The reference to paragraph (2) means really (a) and, thus, the minimum number of aerodrome audits/ inspections, i.e. two.	

comment	1409	comment by: <i>Swedish Transport Agency</i>
	We strongly disagree in the timeframes set out in AMC3-ADR.AR.B.005 (a)(2) on page 8 and suggest to delete this AMC. It is far too limiting. Alternatively double the times, so that in (a) it would be 24 months, in (b) it would be 6 months, (c) and (d) would be 48 months.	

response Accepted
[AMC is moved to GM.](#)

comment 1504 comment by: *ECA - European Cockpit Association*
Change as follows:
RECENT EXPERIENCE REQUIREMENTS FOR AERODROME INSPECTORS
(c) If an aerodrome inspector loses his/her qualification because he/she has not been engaged in performing audits/inspections for a period **larger longer** than that established in paragraph 2 but less than 24 months, he/she should be re-qualified by the competent authority only after successfully completing on-the-job-training and any recurrent training required.

Justification:
Editorial comment.

response Accepted
The text was changed. However, [AMC is moved to GM.](#)

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – AMC4-ADR.AR.B.005(a)(2) – Management System p. 8-9

comment 1 comment by: *Croatian Civil Aviation Agency*
AMC4-ADR.AR.B.005(a)(2) – Management System
TRAINING PROGRAMME AND RECURRENT TRAINING
(4) areas of particular interest include, but are not limited to:
(ix) aerodrome operations, including:
(I) handling of ~~hazardous materials~~ **dangerous goods**;
(J) fuel, facilities, storage and handling;

response Accepted
The text was changed.

comment 381 comment by: *Icelandic Civil Aviation Administration*
AMC4-ADR.AR.B.005(a)(2), (a)(4)(ix)(D) - Not necessary, out of date and should not be mentioned in this non exhaustive list. Suggest to delete.

response Noted

comment 382 comment by: *Icelandic Civil Aviation Administration*
AMC4-ADR.AR.B.005(a)(2)(a)(4)(xi) - Suggest to delete the last part of the sentence (after the comma), areas not needing approval are equally important. This article suggests otherwise.

response Accepted

The text was changed.

comment 875 comment by: *NATS National Air Traffic Services Limited*

There are four AMC to ADR.AR.B.005(a)(2) which are not four different ways of satisfying the IR, rather all four must be complied with in order to satisfy the IR. This is contrary to previous The Agency drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance?

Suggest merging the four AMC into a single AMC.

response Noted

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles

comment 1116 comment by: *Danish Transport Authority*

(a)(4)(ix)(D): The items listed under (ix) shows/signals an unnecessary priority of safety related operations when items like removing disabled aircraft appears in the list and not winter operations. Removal of disabled aircrafts can have capacity/economical impact on the aerodrome. The safety issues regarding disabled aircrafts are very remote and indirect.

response Not accepted

The Agency believes this area is important. Annex 14 contains, in chapter 9, a section related to disabled aircraft removal. Since airport certification is done against The Agency rules that are based on Annex 14, the inspectors should be trained under these requirements.

comment 1155 comment by: *Federal Office of Civil Aviation FOCA*

AMC4-ADR.AR.B.005 (a) (2) (4) (ix): Please add: (K) Aircraft De-/Anti-Icing Procedures. Justification: Area of particular interest in Switzerland.

response Not accepted

Aircraft de-/anti-icing services are currently not under the EASA remit. They constitute services that the aircraft operator has to procure from service providers that are either hosted at the aerodrome or provided by the aerodrome itself. They are, however, related to flight safety and not aerodrome safety as such. Aircraft de-icing is also not covered in the operations chapters of Annex 14.

comment 1277 comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR — AMC4-ADR.AR.B.005(a)(2) — Management system (p8-9)

2. Justification and proposed text / comment

The training programme is for the personnel of the competent authority "in charge of oversight": some people with administrative duties will not have to be trained on the basis on the programme detailed in paragraph (a) of AMC4-ADR.AR.B.005(a)(2).

Moreover, ICAO specifications have been transposed in Regulation (EC) No 216/2008, its Implementing Rules and related acceptable means of compliance, and in certification specifications. Consequently, the knowledge of the Chicago Convention, relevant ICAO Annexes and documents is useful but not as an official part of the training, but as "background knowledge, as dealt with in AMC2-ADR.AR.B.005(a)(2) (page 7). National guidance as been forgotten in paragraph (a) (2).

Linked with the comments n° 1033 in Book I and n° 793 in Book II, which is **critical for DGAC France, and has been made on apron management service, (ix) (H) should be deleted.** As apron management services are not, in France, subcontractors from the aerodrome operator, the inspector who will oversee these services are not necessarily the same as the ones who are in charge of aerodrome operators and aerodromes oversight.

Consequently, it is proposed to revise AMC4-ADR.AR.B.005(a)(2) as follows:

"AMC4-ADR.AR.B.005(a)(2) – Management system

TRAINING PROGRAMME AND RECURRENT TRAINING

(a) The competent authority should establish a training programme for its personnel in charge of oversight including the aerodrome inspectors [...]

(1) aviation legislation organization and structure

(2) ~~the Chicago Convention, relevant ICAO Annexes and documents, the applicable requirements of Regulation (EC) No 216/2008, its Implementing Rules and related acceptable means of compliance, certification specifications and guidance material, as well as assessment methodology of the alternative means of compliance, and the applicable national legislation and national guidance material;~~

(3) the applicable requirements and procedures;

(4) areas of particular interest include, nut are not limited to:

(i)

[...]

(ix) aerodrome operations, including:

(A) aerodrome safeguarding;

[...]

~~(H) apron management and apron safety management~~

~~(H) handling of hazardous materials;~~

~~(J) fuel, facilities, storage and handling;~~

[...]."

response

Partially accepted

On administrative personnel: Noted. Please keep in mind that The Agency does not make rules for administrative personnel but for personnel of the CAAs that is involved with tasks related to the safety of aerodromes. Thus, such specification is not needed.

On Chicago Convention and Annex 14: Not agreed. The Agency considers knowledge of the international regulatory framework essential for aerodrome inspectors.

On national guidance: Not agreed. The Agency replaces the national guidance and it would be inappropriate to mention national guidance here.

On apron management and apron safety management: Noted. The Agency does believe this training item to be essential.

comment 1783 comment by: *AESA - Agencia Estatal de Seguridad Aérea*
Page 8 and 9 (a)
TRAINING PROGRAME AND RECURRENT TRAINING.

Some domains such as heliports, airport equipment (400Hz,...), pavements, obstacles management are missed and others such as aviation legislation organisation and structure and changes in aviation legislation and industry are superfluo.

response Partially accepted
On heliports: Noted. A heliport is also an aerodrome, thus no special mentioning is necessary.
On obstacle management: Agreed. Obstacle assessment was added under safeguarding.
On Chicago Convention and Annex 14: Not agreed. The Agency considers knowledge of the international regulatory framework essential for aerodrome inspectors.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – p. 9-10 GM1-ADR.AR.B.005(a)(2) – Management system

comment 66 comment by: *Flughafen Düsseldorf GmbH*
GM1-ADR.AR.B.005(a)(2) – Management system

AERODROME INSPECTORS – DUTIES

(a) An aerodrome inspector is considered to be any person to whom the competent authority has formally assigned tasks related to the safety oversight of aerodromes.

(b) Apart from the aerodrome oversight tasks, an aerodrome inspector may also undertake other tasks that the competent authority finds necessary[g1] .

[g1]Hier sollte doch ein etwas objektiverer Maßstab gewählt werden (z.B. „as appropriate“)

response Noted
The GM is clear. Aerodrome inspectors can undertake other tasks if the CAA so wishes. No need to add anything.

comment	876	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are five GM to ADR.AR.B.005(a)(2) which are not five different GM to a respective AMC (as there are only four). GM to an AMC should immediately follow the AMC. This approach is contrary to previous EASA drafting principles.	
	Suggest merging the five GM into a single GM.	
response	Not accepted	
	GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – GM2-ADR.AR.B.005 AR.200(a)(2) – Management system	p. 10
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comment	869	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none">• ANNEX I - Part-AR - ADR.AR.B.005 (a) (2) — Management System (p20)• AMC/GM to ANNEX I — Part-AR — GM2-ADR.AR.B.005 AR.200(a) — Management system (p10)• ANNEX II - Part-OR - ADR.OR.D.015 — Personnel requirements (p51-52)• ANNEX II - Part-OR - ADR.OR.D.035 — Record keeping (p55)• AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.D.015(e) — Personnel requirements (p100)• AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.D.015 AR200(e) — Personnel requirements (p100)• ANNEX III — Part-OPS - ADR-OPS.B.010 (a)(3) — Rescue and fire-fighting services (p65)• AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS. B.055 — Fuel quality (p160)• ANNEX III — Part-OPS —ADR-OPS.B.060 — Access to the movement area (p67-68)	
	<u>2. Justification and proposed text / comment</u>	
	This comment is linked with comment 1120 in book I. This comment is critical, as this is linked to an important European directive, it would be very stringent to implement it and the specifications quoted contradict themselves.	
	All personnel do not have to receive a “qualification”, as such a system is very stringent and would induce administrative burden, due to the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions. This word	

(“qualification”) should not be used with the meaning of the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications.

All personnel do not have to receive a “qualification”, as such a system is very stringent and would induce administrative burden, due to the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions and it is very stringent.

However, it seems to be the meaning used here as specified in **AMC1-ADR.OR.D.015(e)**.

What is to be evaluated is the competency of people (including their training, their diploma, their skills). Training is generally adapted to the competency: some provisions use “competency” (which is adequate) and some others use “qualification”.

Moreover, those specifications are not consistent as, for instance, GM2-ADR.AR.B.005 ~~AR.200(a)~~ which contradicts GM3-ADR.AR.B.005 (a)(2) which says that the aim is to ensure “personnel remain competent”.

GM2-ADR.AR.B.005 ~~AR.200(a)~~ includes a non-adequate definition, and even say that “qualification does not necessarily imply competence”, which is wrong.

It is consequently asked to delete references to “qualifications”, which is an important remark from France, and to replace it by “competency”. It is asked to delete references to the European directive, and to revise GM2-ADR.AR.B.005 ~~AR.200(a)~~ and GM3-ADR.AR.B.005 which define these words.

Proposal:

“ADR.AR.B.005 – Management system

(a) [...]

(2) [...] *Such personnel shall be ~~qualified~~ **competent** to perform their allocated tasks [...]*”

“GM2-ADR.AR.B.005 AR.200(a)(2) – Management system

~~QUALIFICATION~~ **COMPETENCY OF PERSONNEL**

*The term ~~qualification~~ **competency** denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree.*

~~Qualification~~ *It could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.*

~~Qualification does not necessarily imply competence.~~

Certain posts may by nature be associated with the possession of certain qualifications in a specific field (e.g. civil or electrical engineering, wildlife biology etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or community legislation.”

“ADR.OR.D.015 – Personnel requirements

[...]

(d) *The aerodrome operator shall have sufficient and ~~qualified~~ **competent***

personnel for the planned tasks and activities to be performed in accordance with the applicable requirements.

(e) The aerodrome operator shall maintain appropriate qualification, if relevant, and training records [...]"

"ADR.OR.D.035 – Record-keeping

[...]

(d) [...]

(5) personnel training, qualifications, if relevant, and medical records [...]"

"AMC1-ADR.OR.D.015(e) – Personnel requirements

DETERMINATION OF PERSONNEL NEEDS AND QUALIFICATIONS

(a) [...]

(b) The aerodrome operator should determine the required **competencies qualifications**, in accordance with the applicable requirements (and the national and European Union legislation where this is applicable, **for qualifications**), and include them in the aerodrome manual. A documented system with defined responsibilities should be in place, in order to identify any needs for changes with regard to personnel qualifications **and/or competency**."

"GM1-ADR.OR.D.015 AR200(e) – Personnel requirements

~~QUALIFICATION~~ **COMPETENCY OF PERSONNEL**

The term ~~qualification~~ **competency** denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree. ~~Qualification~~ **It** could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.

~~Qualification does not necessarily imply competence.~~

Certain posts may by nature be associated with the possession of certain qualifications in a specific field (e.g. rescue and fire-fighting, civil, mechanical or electrical engineering, wildlife biology etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or European Union legislation."

ADR-OPS.B.010 – Rescue and fire-fighting services

"(a) [...]

(3) rescue and fire-fighting personnel are properly trained **and equipped and qualified to operate in the aerodrome environment without prejudice to the system and legal provisions of the relevant Member State;**

[...]"

AMC-ADR-OPS.B.055 – Fuel quality (linked with comment n°908 on responsibilities)

"(a) **Without prejudice to the system and legal provisions of the relevant Member State, t**The aerodrome operator should ensure, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, **implement have** procedures to:

[...]

(4) Use adequately ~~qualified and~~ trained staff in storing, dispensing and otherwise handling fuel on the aerodrome."

response Partially accepted

Partially accepted: The relevant draft Implementing Rule ADR.AR.B.005 (a)(2) does not use the word 'qualification' but the term 'qualified' in relation to authority personnel. Therefore, this refers to being 'qualified' and not necessarily having a qualification in terms of formal certificate or diploma, although that might be necessary for certain posts in the oversight functions. The Agency sees no need to change the Implementing Rule, but is making adjustments to Guidance Material GM2 GM2-ADR.AR.B.005 (a)(2).
The sentence 'Qualification does not necessarily mean competent' in GM2-ADR.AR.B.005 (a)(2) was meant to illustrate that emphasising formal qualification over competency would be wrong, as the form is not a sufficient condition for the latter. The sentence was withdrawn by the Agency.

comment 877 comment by: *NATS National Air Traffic Services Limited*

2 comments

1. GM2 has an incorrect title. Suggest delete "AR.200"
2. There are five GM to ADR.AR.B.005(a)(2) which are not five different GM to a respective AMC (as there are only four). This approach is contrary to previous EASA drafting principles. Suggest merging the five GM into a single GM.

response Partially accepted

1. Agreed. Wrong numbering was cleaned up.
2. Not agreed. GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – GM3-ADR.AR.B.005(a)(2) – Management system p. 10

comment 878 comment by: *NATS National Air Traffic Services Limited*

There are five GM to ADR.AR.B.005(a)(2) which are not five different GM to a respective AMC (as there are only four). This approach is contrary to previous EASA drafting principles. Suggest merging the five GM into a single GM.

response *Noted*

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority p. 10-12

**Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) –
GM4-ADR.AR.B.005(a)(2) – Management system**

comment	879	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are five GM to ADR.AR.B.005(a)(2) which are not five different GM to a respective AMC (as there are only four). This approach is contrary to previous EASA drafting principles. Suggest merging the five GM into a single GM.	
response	<i>Noted</i>	
	GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.	

comment	1784	comment by: <i>AESA - Agencia Estatal de Seguridad Aérea</i>
	Page 11/176	
	1. (b)(1) Quantitative elements	
	<i>Some items such as: Inspections planning and the number of changes in certified aerodromes should be included as point (iv) and (v), respectively.</i>	
	1. Page 11/176 (b)(2) Qualitative elements	
	<i>The item planning works in Aerodrome should be included as point (iv)</i>	
	1. Page 11/176 (c) <i>The number of annual inspections apart from the certification process, should be added as point (6).</i>	
response	<i>Partially accepted</i>	
	On (b)(1): Agreed. The text was changed. On (b)(2): Not agreed. This would be a quantitative element. This section is about qualitative elements however.	

**NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority
Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – p. 12
GM5-ADR.AR.B.005(a)(2) – Management system**

comment	880	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are five GM to ADR.AR.B.005(a)(2) which are not five different GM to a respective AMC (as there are only four). This approach is contrary to previous EASA drafting principles. Suggest merging the five GM into a	

	single GM.
response	Noted GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.
comment	1678 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i> Delete the proposed example to keep the GM to a general/high level
response	Not accepted GM is the right place to give example. They may be good illustration as to how to understand an IR.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – AMC1-ADR.AR.B.005(c) – Management system p. 13

comment	789 comment by: <i>DGAC Direction Générale de l'aviation civile</i> <u>1. Affected paragraphs</u> <ul style="list-style-type: none">• Draft Commission Regulation - Article 3 – Oversight capabilities - paragraph 1 (p10)• ANNEX I – Part-AR - ADR.AR.B.005(c) – Management System (p20)• ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)• ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)• ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)• ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)• ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (c) (p30)• AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.005(c) – Management System (p13)• AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)• AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)• AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) – Confusing, misleading and hazardous lights (p52)• AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) – Confusing, misleading and hazardous lights (p53)• AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)• AMC/GM to ANNEX I – Part-AR - AMC1-ADR-AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES (page 37)• CS-ADR - Book 1 - CS-ADR-DSN.A.002 – Definitions – 'clearway' (p5)
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2. Justification and proposed text / comment

This comment is linked with comment 1008 in book I and 591 in book III. This comment is **critical** as the rules, as written presently, can not be applied in the French system, linked with the definition of "competent authority" and its related obligations. This comment is linked to the issue on responsibility (see proposal for adding Article 2bis in the Cover regulation).

This comment aims to inform EASA on how the French DGAC understands the notion of "competent authority", and also to list the rules which can not be applied for such competent authority.

France understands the competent authority is the civil aviation authority in charge of the oversight of the aerodrome operator for the tasks mentioned in its aerodrome certificate.

To explain our comment: In France, there are regions, and representatives from the States in these regions ("préfet" in French). The local representative from the State has some responsibilities, particularly for land planning use. For example, this representative is competent on land use matters to apply the obstacle limitation surfaces and to edict rules on policy on aerodromes (e.g. defining the movement area or stating that people working on the aerodrome have to be trained). The "préfet" is not considered as a competent authority, as if he was, its services would have to respect all the rules which apply the competent authorities, in particular the obligation to have a SMS: this is not possible in the French system and it would be too complex, too expensive and not feasible considering the reduced resources.

This should be taken into account while writing the rules: it is proposed to clarify this point by distinguishing in the rules the "competent authorities" and the "other authorities". Moreover, security and local land use authorities are considered as "authorities" but shall not be "competent authorities" as requiring them to have a management system would be totally unfeasible.

However, coordination between these entities exists and can be made through several means. DGAC understands that coordination arrangements can be fulfilled by the mean of: protocols, legally defined coordination, or both entities being members of the government or the same State authorities.

DGAC France fully supports the use of the word "appropriate authority" in the definition of "clearway" in CS-ADR-DSN.A.002 (p5), which gives to France the flexibility we need.

It is proposed to clarify these points by:

- **modifying paragraph (c) of ADR.AR.B.005 as follows :**

"The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance of other competent authorities/authorities of the Member State concerned.

- **replacing the 2 first sentences of AMC1-ADR.AR.B.005(c) by:**

« The coordination between the competent authority(ies) and the other authorities of the Member State should be formally documented, and should encompass, as deemed appropriate by the Member State, the following authorities :

~~The competent authority should establish coordination arrangements with other **competent** authorities of the Member State. Such coordination arrangements should in particular include the following **competent** authorities ... »~~

- **modifying the provisions on surroundings: ADR-AR.C.065, ADR-AR.C.070, ADR-AR.C.075, ADR-AR.C.080 and corresponding AMCs and GMs, and AMC1-ADR.AR.C.060(b) as proposed in specific DGAC's comments.**

response

Partially accepted

On modifying AMC1-ADR.AR.B.005 (c):Partially agreed.

The Agency has modified Art. 3 of the Regulation extensively to take account of this situation. We believe that with the designation of the Competent Authority in accordance with Art. 3, the situation will be clear. Other authorities may exist and the Competent Authority has to coordinate with them. Furthermore, other Authority Requirements articles on Land use, obstacle control, and other matters have been removed, and suitable solutions for the respective Member State responsibilities have been found under the Cover Regulation.

A modification concerning the AMC article in question here was made to make clear that the 'Competent Authority' is only that in line with Art. 3. However, coordination other authorities has to be ensured.

comment

1610

comment by: *East Midlands Airport - EMA/EGNX*

Attachment [#17](#)

(c) local planning and land use authorities.

Comment: is this going to be a delegated responsibility to the aerodrome? Competent authority will not be able to deal with casework received to same standard as aerodromes with local knowledge. ODPM Circular 01/2003 (attached) provides details on the delegation of responses from the CAA to the Aerodrome License Holder.

response

Partially accepted

This AMC1-ADR.AR.B.005(c) further details the way in which the competent authority has to coordinate with other authorities inside the Member State. The coordination arrangements mentioned here are the ones that are required by Annex 14 and its associated documents, i.e. Doc. 9774. Based on this for example does a USOP auditor usually ask a an ICAO Member State about coordination documentation, for example with the environmental agency, security agency, and local planning authorities.

Furthermore, the Agency has modified Art. 3 of the Cover Regulation extensively. We believe that with the designation of the Competent Authority in accordance with Art. 3, the situation will be clear. Other authorities may exist and the Competent Authority has to coordinate with them. Furthermore, other AR articles on Land use, obstacle control and other matters have been removed, and suitable solutions for the

respective Member State responsibilities have been found under the Cover Regulation.

A modification concerning the AMC article in question here was made to make clear that the 'Competent Authority' is only that in line with Art. 3. However, coordination with the names of other authorities has to be ensured.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – p. 13-14 AMC1-ADR.AR.B.005(d) – Management system

comment 78 comment by: CAA Norway

We disagree to AMC1-ADR.AR.B.005 (d), (a) on page 13 if this means that copies of procedures and all amendments to these are supposed to be sent/submitted to the Agency. If it means merely to keep procedures/ records available, then it is ok. Please clarify what is meant by "made available". The AMC is too demanding and detailed. Only (a)(1) is of the nature to be sent to the Agency. We suggest to change this from "made available" to: **"documented and available for inspections"**.

response Partially accepted

Indeed 'made available' should be interpreted as 'kept' and sent to the Agency for standardisation purposes upon request.

comment 383 comment by: Icelandic Civil Aviation Administration

We disagree to AMC1-ADR.AR.B.005 (d), (a) on page 13 if this means that copies of procedures and all amendments to these are supposed to be sent/submitted to the Agency. If it means merely to keep procedures/ records available, then it is ok. Please clarify what is meant by "made available". The AMC is too demanding and detailed. Only (a)(1) is of the nature to be sent to the Agency. We suggest to change this from "made available" to: "documented and available for inspections".

response Partially accepted

Indeed 'made available' should be interpreted as 'kept' and sent to the Agency for standardisation purposes upon request.

comment 396 comment by: Estonian CAA

"We disagree to AMC1-ADR.AR.B.005 (d), (a) on page 13 if this means that copies of procedures and all amendments to these are supposed to be sent/submitted to the Agency. If it means merely to keep procedures/ records available, then it is ok. Please clarify what is meant by "made available". The AMC is too demanding and detailed. Only (a)(1) is of the nature to be sent to the Agency. We suggest to change this from "made available" to: "documented and available for inspections"."

response Partially accepted
Indeed 'made available' should be interpreted as 'kept' and sent to the Agency for standardisation purposes upon request.

comment 636 comment by: *Finnish Transport Safety Agency*
We disagree to AMC1-ADR.AR.B.005 (d), (a) on page 13 if this means that copies of procedures and all amendments to these are supposed to be sent/submitted to the Agency. If it means merely to keep procedures/ records available, then it is ok. Please clarify what is meant by "made available". The AMC is too demanding and detailed. Only (a)(1) is of the nature to be sent to the Agency. We suggest to change this from "made available" to: "documented and available for inspections".

response Partially accepted
Indeed 'made available' should be interpreted as 'kept' and sent to the Agency for standardisation purposes upon request.

comment 855 comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.A.015 (d) — Means of compliance (p16-17)
- ANNEX I - Part-AR - ADR.AR.B.005 (d) — Management system (p20)
- ANNEX I - Part-AR - ADR.AR.C.040(f) – Changes (26-27)
- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.B.005(d) — Management system (p13-14)
- AMC/GM to ANNEX I — Part-AR — AMC1 -ADR.AR.C.040(f) — Changes (p31-32)
- AMC/GM to ANNEX I — Part-AR — AMC3 -ADR.AR.C.040(a);(f) — Changes (p32-33)
- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.035(a)(3) - Changes (p28)
- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.040(c) - Changes (p33)
- ANNEX II - Part-OR – ADR-OR.B.040(a) – Changes (p41-42)
- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.B.040(a) — Changes (p60-61)

This comment is linked with comment number 1101 in book I.

2. General comment

These paragraphs lead to many formal exchanges that are not always relevant and that considerably increase the administrative burden of:

- both the EASA and the competent authority for ADR.AR.A.015 (d), ADR.AR.B.005 (d) and the corresponding acceptable means of compliance and
- both the aerodrome operator and the competent authority for ADR.AR.C.040(f) and the corresponding acceptable means of

compliance.

3. Justification and proposed text / comment

- **Paragraph (d) of ADR.AR.A.015**

Minor alternative AMC to the ones proposed by THE AGENCY may be accepted, due to local special constraints. In order to avoid administrative burden both for the EASA and the competent authority, it is proposed to only notify the "significant" alternative AMC, i.e. the ones which differs notably from the EASA's ones and the ones that will be applied on a national scale.

Paragraph (d) of ADR.AR.A.015 requires notification of these alternatives AMC to all other Member States which amplifies considerably the aforementioned administrative burden, in particular for AMC that may not be usable or relevant for other aerodromes.

Paragraph (d) of ADR.AR.A.015 also implies that alternative AMC that could be possibly rejected by EASA will be notified to other Member States, without them knowing of the acceptability the alternative AMC. It is proposed to delete this requirement and let EASA informs all the Member States (for example, through a website) of the AMC that are deemed acceptable.

In order to limit the administrative burden to the most pertinent, DGAC proposes the following modifications of ADR.AR.A.015:

ADR.AR.A.015 – Means of compliance

" [...]

(d) [...] When the competent authority finds that the alternative means of compliance proposed by the aerodrome operator or the provider of apron management services are in accordance with the Implementing Rules, it shall without undue delay:

(1) notify the applicant that the alternative means of compliance may be implemented and, if applicable, amend the approval or certificate of the applicant accordingly;

(2) notify the Agency of their content of the significant ones, including copies of the relevant documentation;

~~*(3) inform other Member States about alternative means of compliance that were accepted.*~~

(e) [...] The competent authority shall provide the Agency with a full description of the significant alternative means of compliance, including any revisions to procedures that may be relevant, as well as an assessment demonstrating that the Implementing Rules are met. "

- **Paragraph (d) of ADR.AR.B.005 and AMC1-ADR.AR.B.005 (d)**

The adaptation of the procedures of the competent authority is a living and ongoing processes. In order to avoid administrative burden both for the competent authority and the EASA, DGAC proposes to only notify the most significant amendments of the procedures.

ADR.AR.B.005 – Management system

" [...]

(d) A copy of the procedures related to the management system and their significant amendments shall be made available to the Agency for the purpose of standardisation."

AMC1-ADR.AR.B.005 (d) – Management system

"PROCEDURES AVAILABLE TO THE AGENCY

(a) Copies of the procedures in the competent authority's management system should be made available to the Agency for the purpose of standardisation. These should include any significant amendments to the procedures. The procedures should provide at least the following information:

[...]"

- Paragraph (f) of ADR.AR.C.040 and AMC1-ADR.AR.C.040(f)

The tasks allocated to the competent authority for "changes not requiring prior approval" are as high as for those requiring prior approval which is not pertinent.

Considering the numerous changes notified to the competent authority, this would lead to high workload incompatible with available resources.

Furthermore, since every change would be thoroughly examined by the competent authority and providing no comment would be considered as implied approval, this would remove responsibility for the change from the aerodrome operator to the competent authority.

This is a **critical** point for DGAC that proposes the following changes to deal with it:

ADR.AR.C.040 – Changes

"[...] (f) For changes not requiring prior approval, the competent authority shall assess the information provided in the notification sent by the aerodrome operator in accordance with ADR.OR.B.040 to verify compliance with the Certification Specifications ~~basis~~ issued by the Agency and the applicable requirements, as appropriate. In case of any non-compliance, the competent authority shall:

(1) notify the aerodrome operator about the non-compliance and request further changes; and

(2) in case of level 1 or level 2 findings, act in accordance with Article ADR.AR.C.055.

[...]"

AMC1 -ADR.AR.C.040(f) – Changes – page 31

"CHANGES NOT REQUIRING PRIOR APPROVAL

(a) Upon receiving a notification of a change that does not require a prior approval, the competent authority should:

*(1) assess the change ~~in relation to~~ **is compliant with** the certification basis and the applicable requirements of Part ADR.OR, Part ADR.OPS, as well as any other applicable requirements;*

(2) ~~assess if the aerodrome operator has identified all the certification specifications, applicable requirements of Part ADR.OR, Part ADR.OPS, or other applicable requirements which are related to or affected by the change, as well as any cases related to demonstration of an equivalent level of safety;~~

(3) ~~assess the actions proposed by the aerodrome operator in order to show compliance with (1) and (2) above;~~

(4) ~~review and assess the content of the changes to the aerodrome manual; and;~~

*(5) ~~evaluate~~ **check that** the safety assessment that has been submitted by the aerodrome operator, in accordance with AMC1-ADR.AR.C.035(b) and verify its compliance with ADR.OR.B.065 **coordinated with third parties,***

*and that it properly identifies risks and mitigation means.
[...]"*

- AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33) and GM1-ADR.AR.C.035(a)(3) – Changes (p28)

In paragraph (a), the changes in nominated persons should not be transmitted to the competent authority as they are not significant safety related matter. The competency of nominated persons should be assessed by the aerodrome operator within its SMS, and the authority will oversee the SMS functioning is adequate, but not assess directly the competency of aerodrome operator staff. The word "qualification" should be avoided (see comment n°869 on qualifications). It is consequently proposed to delete this paragraph.

In paragraph (c): only significant amendments of the management system documentation should be notified to the competent authority.

It is consequently proposed to modify AMC3 -ADR.AR.C.040(a);(f) – Changes as follows :

AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33)

GENERAL

~~(a) Changes in nominated persons: The competent authority should be informed of any changes to personnel specified in Part ADR.OR that may affect the certificate or the terms of approval attached to it. When an aerodrome operator submits the name of a nominee for the nominated persons mentioned in ADR.OR.D.015, the competent authority should assess his/her qualifications and may interview the nominee or call for additional evidence of his/her suitability before deciding upon his/her acceptability (see GM1-ADR.AR.C.035(a)(3)).~~

(b) A documented systematic approach should be used for maintaining the information on when an amendment was received by the competent authority and when it was approved.

*(c) The competent authority should receive from the aerodrome operator each **significant** management system documentation amendment, including amendments that do not require prior approval by the competent authority. Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should indicate its approval in writing. Where the amendment does not require prior approval, the competent authority should acknowledge receipt in writing within the time limits existing under the relevant national legislation.*

[...]"

and delete GM1-ADR.AR.C.035(a)(3) – Changes

GM1-ADR.AR.C.040(c)

It is agreed that any changes to the terms of approval of the certificate should be prior approved by the competent authority. However, this does not systematically lead to the formal change of the certificate itself : for a temporary change the formal process of modifying the certificate might take longer than the changes itself.

It is proposed to modify GM1-ADR.AR.C.040(c) : change "*irrespective of their magnitude*" by "*where appropriate*"

- Paragraph (a) of ADR.OR.B.040 and AMC1-ADR.OR.B.040(a)

Paragraph (a)(3) of ADR.OR.B.040 is not clear on which entity (the competent authority or the aerodrome operator) decides whether a change needs to be approved by the competent authority or not. DGAC proposes modify it to indicate more explicitly that these changes are those that the competent authority finds necessary to be approved:

ADR.OR.B.040 – Changes

“(a) Any significant change affecting:

(1) the terms of approval of the certificate; or

(2) any of the elements of the operator’s management system as required in ADR.OR.D.005 (b)(1), (b)(3), (b)(4), (b)(6) and (b)(7); or

(3) any additional elements notified to the competent authority in accordance with paragraph (c) but ~~found necessary to be approved by the competent authority~~ found necessary by the competent authority to be approved,

shall require prior approval by the competent authority.

[...]”

Paragraph (b) of AMC1-ADR.OR.B.040(a) gives too much details while flexibility is needed and the changes requiring prior approval by the competent authority are already defined in accordance with paragraph (a) and (c) of ADR.OR.B.040. It is essential to delete this paragraph to prevent from useless increased administrative burden between the aerodrome operator and the competent authority.

AMC1-ADR.OR.B.040(a) – Changes

“CHANGES REQUIRING PRIOR APPROVAL

[...]”

~~(b) Examples of such changes include, but are not limited to, the following:~~

~~(1) changes to the physical characteristics of a runway; such as:~~

~~(i) new runway(s): a development resulting in the construction of a 'new' runway (e.g. new construction, or the change of an existing grass surface to a paved surface);~~

~~(ii) runway extension or shortening resulting in an amendment to declared distances;~~

~~(iii) threshold relocation (Instrument Status): a development involving relocation of the instrument runway threshold, or relocation of a non-instrument runway threshold in preparation for instrument status;~~

~~(iv) changes to runway designation.~~

~~(2) changes of the aerodrome visual aids or other changes to the aerodrome, when such changes are associated with a change (upgrade or downgrade) of the intended operations (e.g. to accommodate low visibility operations and/or night operations);~~

~~(3) changes in the aerodrome operating minima;~~

~~(4) change that affects the obstacle limitation surfaces associated with approved type of approaches;~~

~~(5) change in the level of the rescue and fire-fighting services;~~

~~(6) changes in the organisational structure of the organisation, including responsibilities, and accountabilities;~~

~~(7) changes related to fuel provision.”~~

response Not accepted

The AMC as well as ADR.AR.B.005 (d) is about required exchange between the Agency and the Member State Competent Authority for the preparation of standardisation visits. To ensure consistency and coherence throughout the EASA domains, it was introduced as it was already adopted in Commission Regulation No 290/2012. Furthermore, it would be even more burdensome to just send the 'significant' changes of the authority's management system, as was suggested in the comment, because it would require their selection and evaluation by the DGAC. Therefore, the Agency does not want to change the AMC1- ADR.AR.B.005 (d) either.

comment 1117 comment by: *Danish Transport Authority*

(a) Clarify the term "made available". It should mean merely to keep procedures/ records available to the Agency.

response Partially accepted

Indeed 'made available' should be interpreted as 'kept' and sent to the Agency for standardisation purposes upon request.

comment 1410 comment by: *Swedish Transport Agency*

We disagree to AMC1-ADR.AR.B.005 (d), (a) on page 13 if this means that copies of procedures and all amendments to these are supposed to be sent/submitted to the Agency. If it means merely to keep procedures/ records available, then it is ok. Please clarify what is meant by "made available". The AMC is too demanding and detailed. Only (a)(1) is of the nature to be sent to the Agency. We suggest to change this from "made available" to: "documented and available for inspections".

response Partially accepted

Indeed 'made available' should be interpreted as 'kept' and sent to the Agency for standardisation purposes upon request.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – p. 14
AMC1-ADR.AR.B.010(a)(1) – Allocation of tasks**

comment 881 comment by: *NATS National Air Traffic Services Limited*

There are two AMC to ADR.AR.B.010(a)(1) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the two AMC into a single AMC.

response Noted

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on

different subject matters are handled separately and numbered sequentially according to our drafting principles.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – AMC2-ADR.AR.B.010(a)(1) – Allocation of tasks p. 14

comment	882	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are two AMC to ADR.AR.B.010(a)(1) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the two AMC into a single AMC.	
response	Noted	
	GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – GM1-ADR.AR.B.020 – Allocation of tasks p. 14

comment	885	comment by: <i>NATS National Air Traffic Services Limited</i>
	The GM does not align with the corresponding IR. Suggest amend to "GM1-ADR.AR.B.010"	
response	Accepted	
	The text was changed.	
comment	1278	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none">AMC/GM to ANNEX I – Part-AR – GM1-ADR.AR.B.020 – Allocation of tasks (p14)	
	<u>2. Justification and proposed text / comment</u>	
	There is a mistake in the number of the specification. Proposed modification: "GM1-ADR.AR.B.0210 – Allocation of tasks [...]"	
response	Accepted	
	The text was changed.	

**NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority
Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – p. 14-15
AMC1-ADR.AR.B.020(a) – Record-keeping**

comment 889 comment by: *NATS National Air Traffic Services Limited*
AMC1-ADR.AR.B.020(a) -The list of bullets has no lead in from the previous text. Suggest make introductory text (a) and the change (a), (b) and (c) to (b), (c) and (d).

response Accepted
The text was changed.

comment 1279 comment by: *DGAC Direction Générale de l'aviation civile*
1. Affected paragraphs

- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.020(a) – Record Keeping (p14-15)

2. Justification and proposed text / comment

The requirement of AMC1 for having backup data stored in a different location is rarely feasible.

This is not done in the present French system and would be far too complicated and too expensive to implement.

Proposal: Paragraphs (b) and (c) of AMC1-ADR.AR.B.020(a) should be moved to GM.

response Partially accepted
Along with Commission Regulation No 290/2012, and in relation to ARA.GEN.220 (a) has the Executive Director of the Agency just adopted the analogous AMC for the area of aircrew. This AMC was developed with the help of experts from France and other countries. The Agency does not believe this to be too burdensome. Backup systems are essential to all systems of electronic data storage.
However, the Agency has made the AMC1-ADR.AR.B.020(a) – Record Keeping closer to the version used in air crew domain.

comment 2055 comment by: *AENA - Aeropuertos Españoles y Navegación Aérea*
The requirement of AMC1 for having backup data stored in a different location is rarely feasible.
It would be far too complicated and too expensive to implement.
Proposal: Paragraphs (b) and (c) of AMC1-ADR.AR.B.020(a) should be moved to GM.

response Partially accepted
Along with Commission Regulation No 290/2012, and in relation to

ARA.GEN.220 (a) has the Executive Director of EASA just adopted the analogous AMC for the area of aircrew. This AMC was developed with the help of experts from France and other countries. The Agency does not believe this to be too burdensome. Backup systems are essential to all systems of electronic data storage.

However, The Agency has made the AMC1-ADR.AR.B.020(a) — Record-keeping closer to the version used in air crew domain.

NPA 2011-20 (B.II) — AMC/GM to ANNEX I — Part Authority Requirements (Part-AR) — SUBPART B — MANAGEMENT (ADR.AR.B) — AMC1-ADR.AR.B.020(a)(1);(a)(2);(a)(3) — Record-keeping p. 15

comment 892 comment by: *NATS National Air Traffic Services Limited*
(a) is the same requirement as in ADR.AR.B.020(a)(1).
Suggest delete (a).

response Not accepted
An AMC is not a requirement of the same legal value as an Implementing Rule, but an Acceptable Means of Compliance, so that the repetition for the sake of completeness is not harmful.

NPA 2011-20 (B.II) — AMC/GM to ANNEX I — Part Authority Requirements (Part-AR) — SUBPART B — MANAGEMENT (ADR.AR.B) — AMC1-ADR.AR.B.020(c)(1) — Record-keeping p. 16

comment 910 comment by: *NATS National Air Traffic Services Limited*
AMC1-ADR.AR.B.020(c)(1) - 2 comments
1. The related IR does not include "Providers of Apron Management" whereas the title of this AMC includes it. Recommend clarifying if apron management services is included or not, if not amend title and delete (c).
2. (a)(b) & (c) - There is no "should" in this AMC thus making it GM.

response Partially accepted
1. Agreed. The text of the relevant part of the IR was changed to include providers of ASM and their declarations.
2. Not agreed. 'should' is not confined to AMCs.

comment 1216 comment by: *UK CAA*
Page No: 16
Paragraph No: AMC1-ADR.AR.B.020(c)(1) (a) (2)

Comment: Further bullet required under item (2) to include the Deviation Acceptance & Action Document.

Justification: The paragraph is aimed at detailing what should be retained as part of the certification of an aerodrome. The DAAD, as part of that certification process, should require the records of the accepted deviation to be kept as long as applicable.

Proposed Text: ADD (a)(2)(iii)

(iii) Documentation related to accepted deviations from Certification Specifications that fail to qualify as an Equivalent Level Of Safety or a Special Condition.

response

Partially accepted

It has been requested that the Deviation Acceptance & Action Documents (DAAD) listed in the Implementing Rule on the issuance of the certificate, even though it is a transitory measure, i.e. limited in time. If it should be listed in the AMC, this would not be where suggested under (a)(2), as it is not part of the Certification Basis, but further down between (3) and (4), as a new (4).

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – GM1-ADR.AR.B.020(a) – Record-keeping p. 17

comment

912

comment by: *NATS National Air Traffic Services Limited*

There are two GM to ADR.AR.B.020(a) which are not two different GM to a respective AMC. This approach is contrary to previous EASA drafting principles. Suggest merging the two GM into a single GM.

response

Noted

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART B – MANAGEMENT (ADR.AR.B) – GM2-AR.ADR.AR.B.020 (a) – Record-keeping p. 17

comment

913

comment by: *NATS National Air Traffic Services Limited*

There are two GM to ADR.AR.B.020(a) which are not two different GM to a respective AMC. This approach is contrary to previous EASA drafting principles. Suggest merging the two GM into a single GM.

response

Noted

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on

different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment	914	comment by: <i>NATS National Air Traffic Services Limited</i>
		GM2-AR.ADR.AR.B.020(a) - GM2 is has an incorrect title, suggest amend to "GM2-ADR.AR.B.020(a)"
response		Accepted The text was changed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.005 – Oversight	p. 18
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comment	793 ❖	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
		<u>1. Affected paragraphs</u> <ul style="list-style-type: none">• A. Explanatory Note - II. Process and scope (p5,6): note 2• Draft Commission Regulation (p2-5): §12• ANNEX I - Part-AR - ADR.AR.C.005 – Oversight (p23)• ANNEX I - Part-AR - ADR.AR.C.050 – Declarations of providers of apron management services (p27-28)• ANNEX I - Part AR - APPENDIX I (p32-33)• ANNEX I - Part AR - APPENDIX II (p34-36)• ANNEX II - Part-OR - ADR.OR.B.060 – Declaration of providers of apron management services (p43-44)• ANNEX II - Part-OR - APPENDIX II (p61-62)• AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.A.030(d) – Immediate reaction to a safety problem (p3)• AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.C.005 – Oversight (p18)• AMC/GM to ANNEX II – Part-OR – AMC2-ADR.OR.E.005 – Aerodrome manual (p109-114) – part E – 16 <u>2. General comment</u> <p>This comment is critical.</p> <p>As it is said in the explanatory note (<i>II. Process and scope, note 2, pages 5-6</i>), the Agency did not undertake the development of safety rules for apron management services but later on will initiate a joint group with ATM. However, some procedural rules related to those services are included in the proposed rules.</p> <p>DGAC considers it is essential to provide the flexibility needed to conduct further debates that will take place in the given joint group.</p> <p>In particular, the connection between the aerodrome operator and providers of apron management service can not be established without further debates. Indeed, providers of apron management services, when existing, <u>can be independent from the aerodrome operator</u>, with arrangements between these two entities. For example in CDG airport, providers of apron management services are not subcontractors of the</p>

CDG operator. Moreover, there is a risk of inconsistency with what will be proposed by the joint group that will propose draft regulation on that point.

Therefore, the procedural rules included in the proposed Implementing Rules and corresponding AMC/GM shall remain at a high level stage only.

The provisions of the NPA that would consequently need to be revised are dealt with case by case in the proposed texts/comments below:

3. Justification and proposed texts / comments

This comment is linked with comment 23 in Explanatory note and 1033 in book I.

- ADR.AR.C.005 — Oversight: Paragraph (a)(2)

DGAC understands the certification basis is not applicable to providers of apron management services, but it's not clear in paragraph (a)(2) of ADR.AR.C.005.

Providers of apron management services declare their compliance to applicable requirements only, thus the proposed change:

"(a) [...]"

(2) *continued compliance, with the certification basis and/or applicable requirements [...]"*

- ADR.AR.C.050 — Declarations of providers of apron management services

Considering what is said in the general comment just above and the fact that providers of apron management services are not subcontractors of the aerodrome operator, it would be inappropriate, when the competent authority has to notify something to the apron management services, to systematically notify it also to the aerodrome operator. Moreover, this could induce more delays to solve the problem as it could be understood that the corrective action is to be done by other entities.

Finally, as this is not a requirement, the wording "*if required*" should be replaced by "*when deemed necessary*".

Thus DGAC proposes to modify paragraph (b) of ADR.AR.C.050 as follows:
"If the declaration does not contain the required information, or contains information that indicates non-compliance with applicable requirements, the competent authority shall notify the provider of apron management services about the non-compliance and request further information. ~~and If deemed necessary, the competent authority can address a copy of this notification to the aerodrome operator about the non-compliance and request further information. If required-deemed necessary, the competent authority shall carry out an inspection of the provider of apron management services and the aerodrome operator. If the non-compliance is confirmed, the competent authority shall take action as defined in ADR.AR.C.055 towards the apron management service"~~

- Part AR - APPENDIX I and APPENDIX II

The name of the provider of apron management service should not be part of the certificate of the aerodrome operator because they can be independent.

APPENDIX I

"[...]"

TERMS OF APPROVAL

Provision of apron management services:	Specify name of service provider
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[...]"

APPENDIX II

"[...]

~~Apron management services are provided by [specify name of service provider].~~

[...]"

· ADR.OR.B.060 — Declaration of providers of apron management services

Paragraph (a): DGAC doesn't understand the pertinence of having an agreement with an aerodrome operator.

~~"(a) The provider of apron management services, following an agreement with an aerodrome operator for the provision of such services at an aerodrome, shall:"~~

Paragraph (a)(5): DGAC finds this provision goes too far. Moreover, nobody will verify that the provider of apron management service complies with the aerodrome manual; in particular it's absolutely not the aerodrome operator's task.

~~"(5) provide its services in accordance with the aerodrome manual and comply with all relevant provisions contained therein"~~

Paragraph (b): DGAC doesn't understand the pertinence of notifying the aerodrome operator when ceasing activity.

~~"(b) Before ceasing the provision of such services, the provider of apron management services shall notify the competent authority and the aerodrome operator."~~

· Part-OR - APPENDIX II

In order to be clearer, DGAC proposes to clarify that these declarations of the providers of apron management services are declarations "of compliance" (see the proposed titles below).

Moreover, it is essential to delete "The service is provided in accordance with the content of the relevant aerodrome manual" as this is absolutely not high level and as it may induce a risk of inconstancy with the future rules on apron management services.

"Appendix II to Annex II

Declaration of compliance

In accordance with Commission Regulation (EC) No XXX/2013 laying down requirements and procedures related to aerodromes pursuant to Regulation (EC) No 216/ 2008 of the European Parliament and of the Council

[...]

~~ð The service is provided in accordance with the content of the relevant aerodrome manual.~~

[...]

ð (If applicable) The operator has implemented and demonstrated conformance to an officially recognised industry standard.

Reference of the standard: Certification body:

Date of the last conformance audit:

[...]

· AMC1-ADR.AR.A.030(d) — Immediate reaction to a safety problem

AMC1-ADR.AR.A.030(d) is to be deleted:

~~"**AMC1-ADR.AR.A.030(d) — Immediate reaction to a safety problem**
NOTIFICATION OF MEASURES~~

~~*In case that the competent authority directs a measure to a provider apron management services, then these measures should also be notified to the aerodrome operator."*~~

· AMC1-ADR.AR.C.005 — Oversight

High level provisions in this NPA state that apron management services shall provide a declaration to the competent authority when appropriate. But the oversight of the "continued competence" goes beyond this statement and therefore merits further debates.

Moreover, the word "*qualified*" should be avoided considering it is referring to very specific terminology laid down in directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions.

Thus the following proposed changes to this AMC:

AMC1-ADR.AR.C.005 — Oversight

"GENERAL

(a) The competent authority should assess the aerodrome operator and monitor its continued competence to conduct safe operations in compliance with the applicable requirements and the certification basis. Similarly, the competent authority should monitor the continued competence of providers of apron management services. The competent authority should ensure that accountability for assessing and monitoring aerodrome operators as well as providers apron management services is clearly defined. This accountability may be delegated or shared, in whole or in part.

(b) It is essential that the competent authority shall have the full capability to adequately assess the continued competence of an aerodrome operator or a provider of apron management services by ensuring that the whole range of activities is assessed by appropriately qualified trained personnel."

· AMC2-ADR.OR.E.005 — Aerodrome manual

AMC2-ADR.OR.E.005 includes in the aerodrome manual the procedures for apron management. This is not high level provision and strongly needs further debates, because the relevancy of having apron management procedures in the aerodrome manual is not proven.

For instance, it is possible to imagine a system where the providers of apron management service have their own procedures and the aerodrome operator has nothing to do with them. Chapter 16 of part E of the structure of the aerodrome manual is to be deleted.

Note: DGAC also proposes to put the content of this AMC to GM because of the high level of details that doesn't fit to all organization. See comment xx.

"AMC2GM1-ADR.OR.E.00510 — Structure of aerodrome manual

[...]

~~16. Procedures for apron management including:
16.1 transfer of the aircraft between air traffic control and the apron management unit;
16.2 allocation of aircraft parking positions;
16.3 engine start and aircraft push-back;
16.4 marshalling and follow-me service.
[...]"~~

response Partially accepted

The proposed AMC does not use the word 'qualification' but the term 'qualified' in relation to authority personnel. Therefore, this refers to being 'qualified' and not necessarily having a qualification in terms of formal certificate or diploma, although that might be necessary for certain posts in the oversight functions. The Agency sees no need to change this GM, but is making adjustments to the Guidance Material under the management system of Competent Authorities GM2-ADR.AR.B.005(a)(2). See also all our responses to that section and its AMC/GM.

comment 2095 comment by: HIA - Highlands and Islands Airports Limited

GM1-ADR.AR.C005 (c) - The accountable manager is accountable to the competent authority as well as to those who may appoint him/her ...competent authority cannot accept a situation in which manager is denied funds, manpower etc

Does this mean that the Competent Authority can overturn the Aerodrome Licensee's decision through an Accountable Manager's perspective?

response Noted

This comment was wrongly assigned to the AMC not the GM. We answer it nevertheless here.

This GM is meant to emphasise the Accountable Manager's ultimate responsibility for the compliance of the aerodrome operator organisation and the keeping in good compliance of the infrastructure of the aerodrome. This AMC must be read together with the AMC1-ADR.OR.D.015(a)-Personnel requirements on the role of the accountable manager. It says there under (a)(1)(i) that the accountable manager should:

'ensure that all necessary resources are available to operate the aerodrome in accordance with the applicable requirements and the aerodrome manual'

The Competent Authority must surely step in and maybe put some restrictions on the use of the aerodrome if something that needed to be rectified in the company's management or the aerodrome infrastructure is not being taken care of.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM1-ADR.AR.C.005 – Oversight p. 18

comment 67 comment by: Flughafen Düsseldorf GmbH

GM1-ADR.AR.C.005 – Oversight

GENERAL

(a) Responsibility for the safe operation of an aerodrome lies with the aerodrome operator.

Under these provisions a positive move is made towards devolving upon the aerodrome operator a share of the responsibility for monitoring the safety of operations. The objective cannot be attained unless aerodrome operators are prepared to accept the implications of this policy including that of committing the necessary resources to its implementation. Crucial to success of the policy is the content of Part-ADR.OR which requires the establishment of a management system by the aerodrome operator.

(b) The competent authority should continue to assess the aerodrome operator's compliance with the applicable requirements, including the effectiveness of its management system. If the management system is judged to have failed in its effectiveness, then this in itself is a breach of the requirements which may, among others, call into question the validity of the certificate.

(c) The accountable manager is accountable to the competent authority as well as to those who may appoint him/her[g1]. It follows that the competent authority cannot accept a situation in which the accountable manager is denied sufficient funds, manpower or influence to rectify deficiencies identified by the management system.

[g1]Geschäftsführung?

response

Noted

A new GM will be now provided on the OR side that helps with understanding the role of the accountable manager. All requirements and AMC/GM on the matter should be read carefully to understand this concept fully.

GM1-ADR.OR.D.015(a) – Personnel requirements

ACCOUNTABLE MANAGER

Depending on the size, structure and complexity of the organization, the Accountable Manager may be:

- a) the chief executive officer (CEO);*
- b) the chief operating officer (COO);*
- c) the chairperson of the board of directors;*
- d) a partner; or*
- e) the proprietor.*

The appointment of an accountable manager who is given the required authorities and responsibilities requires that the individual has the necessary attributes to fulfil the role. The accountable manager may have more than one function in the organization. Nonetheless, the accountable managers's role is to in instil safety as a core organizational value and to ensure that the safety management system is properly implemented and maintained through the allocation of resources and tasks.

**Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION
AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.010(c) –
Oversight programme**

comment 79 comment by: CAA Norway
We recommend that the text in AMC1-ADR.AR.C.010 (c), (b) on page 18-19 from "Moreover,...etc" is moved into GM to guide competent authorities who want shorter oversight cycle on how they best may do so.

response Partially accepted
Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle is to be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1-ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment 80 comment by: CAA Norway
We suggest the "24 months" in AMC1-ADR.AR.C.010 (c), (c) on page 19 is changed to "48 months". The "24 months" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months.

response Partially accepted
The crediting idea was deleted for the aerodrome rules as this is not really applicable.

comment 81 comment by: CAA Norway
We suggest to delete the existing AMC1-ADR.AR.C.010 (c), (d) on page 19. The necessary meetings for safety oversight are internal part of an audit. Extra meetings may be called for at the discretion of the authority.

response Not accepted
The Agency believes that a meeting between the competent authority and the accountable manger during an oversight cycle is useful so that both parties remain informed about significant issues. Such a meeting is even mandatory (Implementing Rule level) in Commission Regulation (EU) No 290/2012 on civil aviation aircrew, under ARA.GEN.305 (b)(2). To delete this part of the AMC is, therefore, not appropriate.

comment 82 comment by: CAA Norway
We suggest a new AMC1-ADR.AR.C.010 (c) , (d) on page 19: "**Extra**

meetings with the management of the aerodrome operator, including the accountable manager or its high level delegate, as determined necessary by the competent authority, may be requested at the discretion of the competent authority."

response Not accepted

The Agency believes that a meeting between the competent authority and the accountable manager during an oversight cycle is useful so that both parties remain informed about significant issues. Such a meeting is even mandatory (Implementing Rule level) in Commission Regulation (EU) No 290/2012 on civil aviation aircrew, under ARA.GEN.305 (b)(2). To delete this part of the AMC is, therefore, not appropriate.

comment 120

comment by: CAA-NL

Normal situation is 24 months and the oversight planning cycle can be extended to 36 or 48 months under certain conditions. We interpret this AMC in such a way that it is possible to extend the oversight planning cycle right from the start based on the track record of the aerodrome operator to fulfill the conditions prior to the entry into force of the European legislation.

response Accepted

If there was an ICAO Annex 14 based licencing/certification system in place in the member state before, it would be appropriate to consider the track record of the aerodrome operator prior to the entry into force of the European legislation.

Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment 248

comment by: CAA Norway

The oversight planning cycle should be risk based and maximum 48 months.

The "24 months" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months. Suggest to change this into: "***The oversight planning cycle may be decided shorter than 48 months if the competent authority so prefers.***"

response Not accepted

Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of

apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment

305

comment by: *Danish Transport Authority*

The oversight planning cycle should be risked based and within maximum 48 months according to ADR.AR.C.010. Suggest to move the structure to GM or change into: "The oversight planning cycle may be decided shorter than 48 months if the competent authority so prefers.". The current description are pointed against new aerodromes/not certified aerodromes and not covering the conversion of certificates for existing aerodromes.

response

Not accepted

Comment on 'risk-based' and bias towards 'old' aerodromes: Not agreed. It is not true that ADR.AR.C.010(c) mentions the words 'risk-based'. The rule ADR.AR.C.005 says that the oversight programme cycle shall be 48 months maximum.

Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment

386

comment by: *Icelandic Civil Aviation Administration*

AMC1-ADR.AR.C.010 (c), (b), first section. - The oversight planning cycle should be risked based and maximum 48 months. The "24 months" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months. Suggest to change this into: "The oversight planning cycle may be decided shorter than 48 months if the competent authority so prefers." One oversight planning cycle may contain several partial audits and inspections but in whole covers all applicable requirements."

response

Not accepted

Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle,

was changed to provide the criteria to be used for this approach.

comment 387 comment by: *Icelandic Civil Aviation Administration*
We recommend that the text in AMC1-ADR.AR.C.010 (c), (b) on page 18-19 from "Moreover,...etc" is moved into GM to guide competent authorities who want shorter oversight cycle on how they best may do so.

response Partially accepted
Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach..

comment 390 comment by: *Icelandic Civil Aviation Administration*
We suggest the "24 months" in AMC1-ADR.AR.C.010 (c), (c) on page 19 is changed to "48 months". The "24 months" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months.

response Partially accepted
The crediting idea was deleted for the aerodrome rules as this is not really applicable.

comment 393 comment by: *Icelandic Civil Aviation Administration*
We suggest to delete the existing AMC1-ADR.AR.C.010 (c), (d) on page 19. The necessary meetings for safety oversight are internal part of an audit. Extra meetings may be called for at the discretion of the authority. As minimum we suggest a new d: "Extra meetings with the management of the aerodrome operator, including the accountable manager or its high level delegate, as determined necessary by the competent authority, may be requested at the discretion of the competent authority."

response Not accepted
The Agency believes that a meeting between the competent authority and the accountable manger during an oversight cycle is useful so that both parties remain informed about significant issues. Such a meeting is even mandatory (Implementing Rule level) in Commission Regulation (EU) No 290/2012 on civil aviation aircrew, under ARA.GEN.305 (b)(2). To delete this part of the AMC is, therefore, not appropriate.

comment 398 comment by: *Estonian CAA*
We recommend that the text in AMC1-ADR.AR.C.010 (c), (b) on page 18-19 from "Moreover,...etc" is moved into GM to guide competent authorities

	who want shorter oversight cycle on how they best may do so.
response	<p><i>Partially accepted</i></p> <p>Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.</p>
comment	<p>400 comment by: <i>Estonian CAA</i></p> <p>"We suggest the ""24 months"" in AMC1-ADR.AR.C.010 (c), (c) on page 19 is changed to ""48 months"". The ""24 months"" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months. "</p>
response	<p>Partially accepted</p> <p>The crediting idea was deleted for the aerodrome rules as this is not really applicable.</p>
comment	<p>587 comment by: <i>Exeter International Airport</i></p> <p>AMC2-ADR.AR.C.010(b) (b) 8 - Delete "handling of dangerous goods". This is not a role for the aerodrome operator, this is for the airlines, handlers and freight operators.</p>
response	<p><i>Not accepted</i></p> <p>This item, (b) 8, is a standard learning item coming from Doc. 9774 on aerodrome certification, in section 5-5 on qualification of authority staff.</p> <p>.</p>
comment	<p>637 comment by: <i>Finnish Transport Safety Agency</i></p> <p>AMC1-ADR.AR.C.010 (c), (b), first section. - The oversight planning cycle should be risked based and maximum 48 months. The "24 months" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months. Suggest to change this into: "The oversight planning cycle may be decided shorter than 48 moths if the competent authority so preferres."</p>
response	<p>Not accepted</p> <p>Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of</p>

apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment 638 comment by: *Finnish Transport Safety Agency*
We recommend that the text in AMC1-ADR.AR.C.010 (c), (b) on page 18-19 from "Moreover,...etc" is moved into GM to guide competent authorities who want shorter oversight cycle on how they best may do so.

response Partially accepted
Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment 639 comment by: *Finnish Transport Safety Agency*
We suggest the "24 months" in AMC1-ADR.AR.C.010 (c), (c) on page 19 is changed to "48 months". The "24 months" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months.

response Partially accepted
The crediting idea was deleted for the aerodrome rules as this is not really applicable.

comment 916 comment by: *NATS National Air Traffic Services Limited*
It would be logical for AMC relating to ADR.AR.C.010(c) to follow AMC relating to ADR.AR.C.010(b). Suggest re-order.

response Accepted
Order was changed.

comment 1119 comment by: *Danish Transport Authority*
The oversight planning cycle should be risked based and within maximum 48 months according to ADR.AR.C.010. Suggest to move the structure to GM or change into: "The oversight planning cycle may be decided shorter than 48 months if the competent authority so prefers.". The current description are pointed against new aerodromes/not certified aerodromes and not covering the conversion of certificates for existing aerodromes.

response

Not accepted

Comment on 'risk-based' and bias towards 'old' aerodromes: Not agreed. It is not true that ADR.AR.C.010(c) mentions the words 'risk-based'. The rule ADR.AR.C.005 says that the oversight programme cycle shall be 48 months maximum.

Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment

1156

comment by: *Federal Office of Civil Aviation FOCA*

AMC1-ADR.AR.C.010 (c):

1. The oversight planning cycle may be further extended to a maximum of 48 months. It is not clear for the NAA what the oversight of 48 months includes – please clarify.

2. The oversight planning cycle should be 24 months. It may be reduced if there is evidence that the safety performance of the aerodrome operator has decreased. It is necessary to conduct oversight with a risk-based approach. Please change article in ways that it may be reduced if there is evidence that safety performance of the aerodrome operators has decreased or if the risk-based approach is chosen.

response

Partially accepted

1: Noted.

The Agency does not understand the question. An oversight planning cycle means a time period where all applicable requirements are verified with audits and inspections. This means that during this cycle, the whole set of applicable rules need to be audited and inspected.

2: Partially agreed.

Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment 1157 comment by: *Federal Office of Civil Aviation FOCA*

AMC1-ADR.AR.C.010 (c), (b), first section: The "24 months" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months. Please change to: "The oversight planning cycle may be decided in less than 48 months at the discretion of the competent authority".

AMC1-ADR.AR.C.010 (c), (b), second section: Recommended that the text from "Moreover,..." etc. is moved into GM. Justification: The competent authorities must be free to decide on shorter oversight cycle.

AMC1-ADR.AR.C.010 (c), (c): FOCA suggests to delete the whole (c). If not deleted, the "24 months" should be changed to "48 months" at least.

AMC1-ADR.AR.C.010 (c), (d): FOCA suggests to delete the existing (d). The necessary meetings for safety oversight are an integral part of an audit. Extra meetings may be called for at the discretion of the authority.

response Partially accepted

First and Second part of the comment:Not agreed.

Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

Third part of the comment:Partially agreed.

The crediting idea was deleted for the aerodrome rules as this is not really applicable.

Fourth part of the comment:Not agreed.

The Agency believes that a meeting between the competent authority and the accountable manger during an oversight cycle is useful so that both parties remain informed about significant issues. Such a meeting is even mandatory (Implementing Rule level) in Commission Regulation (EU) No 290/2012 on civil aviation aircrew, under ARA.GEN.305 (b)(2). To delete this part of the AMC is, therefore, not appropriate.

comment 1221 comment by: *UK CAA*

Page No: 18

Paragraph No: AMC1-ADR.AR.C.010(c)

Comment: The rule text, as currently written, allows the competent authority to determine the audit cycle but with a backstop of 48 months.

The text differs from the standard IR text used in AR/OR.GEN which defaults to 24 months and then further justification to push out to 36 months and 48 months. In the Aerodromes NPA, the 24/36/48 months text is in AMC, **which the UK CAA supports.**

Justification: It enables the CAA to continue with its current, effective audit cycle and enables this to continue without additional extra work or burden on the aerodromes for no obvious benefit. The CAA will continue to use its risk-based approach.

Proposed Text: Leave the text in AMC1-ADR.AR.C.010(b) – do not move this to the IR.

response Noted

comment 1411 comment by: *Swedish Transport Agency*

AMC1-ADR.AR.C.010 (c), (b), first section. The oversight planning cycle should be risk based and maximum 48 months. The "24 months" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months. Suggest to change this into: "The oversight planning cycle may be decided shorter than 48 months if the competent authority so prefers."

response Not accepted

Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment 1412 comment by: *Swedish Transport Agency*

AMC1-ADR.AR.C.010 (c), (b), second section. We recommend that the text in AMC1-ADR.AR.C.010 (c), (b) on page 18-19 from "Moreover,...etc" is moved into GM to guide competent authorities who want shorter oversight cycle on how they best may do so.

response Partially accepted

Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment	1413	comment by: <i>Swedish Transport Agency</i>
	AMC1-ADR.AR.C.010 (c), (c) . We suggest the "24 months" in AMC1-ADR.AR.C.010 (c), (c) on page 19 is changed to "48 months". The "24 months" is in contradiction to ADR.AR.C.010 where the requirement for the length of the oversight planning cycle is 48 months.	
response	Partially accepted The crediting idea was deleted for the aerodrome rules as this is not really applicable.	
comment	2096	comment by: <i>HIA - Highlands and Islands Airports Limited</i>
	AMC1-ADR.AR C.010(c) (c) - For operators of more than one airport to avoid duplication of audits credit may be granted for specific items during the oversight planning cycle. Consider adding more detail on how this will be addressed.	
response	Noted More detail on this is currently not planned. It can be suggested as a rulemaking item to the repository of suggested rulemaking tasks. Please contact the UK member of the Rulemaking Advisory Group (RAG) and Thematic Advisory Groups (TAGs).	
comment	2306	comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i>
	delete (d). Such meetings are part of the audit process, as such this article is not necessary.	
response	Not accepted The Agency believes that a meeting between the competent authority and the accountable manger during an oversight cycle is useful so that both parties remain informed about significant issues. Such a meeting is even mandatory (Implementing Rule level) in Commission Regulation (EU) No 290/2012 on civil aviation aircrew, under ARA.GEN.305 (b)(2). To delete this part of the AMC is, therefore, not appropriate.	
comment	2308	comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i>
	Delete (c)(3) or change to at least 48 months.	
response	Partially accepted The crediting idea was deleted for the aerodrome rules as this is not really applicable.	
comment	2311	comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i>
	(b) from the word "Moreover ..." mmove to GM	
response	Partially accepted Since the NPA, the rule ADR.AR.C.010 was changed to make it more	

safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment 2313 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
(b) the competent authority should be able to set the cycle as they see fit, without conditions.

response Partially accepted
Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach.

comment 2318 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
"24 months" contradicts ADR.AR.C.010 where the requirement is 48 months

response Partially accepted
Since the NPA, the rule ADR.AR.C.010 was changed to make it more safety performance and risk based oriented. This means that the oversight planning cycle be made appropriate to the safety performance, the past audit results, and the current risk profile of the aerodrome or provider of apron management services, but shall never exceed 48 months. The safety performance and risk profile should be annually determined and reviewed so that the related oversight programme can be adjusted to the results of these reviews. In order to support this approach, the AMC which is now called AMC1 ADR.AR.C.010(b) to (e) on the oversight audit cycle, was changed to provide the criteria to be used for this approach..

comment 2630 comment by: *Fraport AG*
AMC1-ADR.AR.C.010(c) – Oversight programme (c)
Question
For aerodrome operators operating more than one aerodrome in order to avoid duplication of audits, credit may be granted for specific item audits already completed during the current oversight planning cycle subject to

	<p>the following conditions:</p> <p>Clarification for ADR operator with activities in different countries necessary.</p> <p>Fraport AG</p> <p>Have no idea how this should work when the ADR operator activities in different countries.</p>
response	<p>Accepted</p> <p>It would not work as the competent authorities would not be the same. As a consequence of Basic Regulation, in recital (8) of Regulation (EC) No 1108/2009, the aerodrome operator of an aerodrome always has to have a certificate from the country in which the aerodrome is located.</p>

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC2-ADR.AR.C.010(b) – Oversight programme p. 19-21

comment	<p>68 comment by: <i>Flughafen Düsseldorf GmbH</i></p> <p><u>(h) (h) They should take account of any conditions that may indicate a significant deterioration in the operator's financial situation. Examples of trends which may indicate problems in a new aerodrome operator's financial situation could be:</u></p> <p>(1) (1) significant lay-offs or turnover of personnel; reduced staff resource; increased multi-tasking; changing shift patterns; increased overtime;</p> <p>(2) delays in meeting payroll;</p> <p>(3) reduction of safe operating standards; (4) decreasing standards of training;</p> <p>(5) withdrawal of credit by suppliers;</p> <p>(6) inadequate maintenance of the aerodrome; and</p> <p>(7) shortage of supplies and spare parts.</p> <p>When any financial difficulties are identified, aerodrome inspectors should increase technical surveillance of the operation with particular emphasis on the upholding of safety standards.[g1]</p> <hr/> <p>[g1]Die finanzielle Situation eines Flughafenbetreibers sollte nicht von einer Flugsicherheits- / Verkehrsbehörde geprüft werden.</p>
response	<p>Noted</p> <p>This AMC is not saying that the audit will include a financial check. It says</p>

that note should be taken of indications suggesting financial difficulties as financial difficulties may put stress on the budgets for necessary maintenance.

comment 83 comment by: CAA Norway
We suggest to move AMC2-ADR.AR.C.010(b), (b) on page 19 to GM as it is only meant as an indicative list, and this is what it should be.

response Partially accepted
This AMC is an overview of what an audit should contain, and is, therefore, AMC, not GM. It is a core element of an oversight system. The list is indicative as it is open to other elements depending on the aerodrome operations in question. However, the word 'indicative' should be exchanged with '...should include, but not be limited to...'.

comment 84 comment by: CAA Norway
We suggest to change AMC2-ADR.AR.C.010(b), (b)(8) on page 19 to "***..the oversight by aerodrome operator of third parties, such as handling facilities, storage facilities and ...***"

response Partially accepted
The Agency believes that the oversight over third parties and their compliance with the aerodrome manual is crucial. Therefore, it is good to include this in this list. It is, however, warranting an extra point. This is done in the new version of the AMC:

(23) operator's oversight of the compliance of the organisations operating or providing services at the aerodrome (third parties)

Please, see also the improved AMC on this matter on the OR side: AMC2 ADR.OR.D.025(b) Coordination with other relevant organisations

comment 85 comment by: CAA Norway
We suggest to insert text in AMC2-ADR.AR.C.010 (b), (d) on page 20 "assess the root cause(s) ***identified by the aerodrome operator*** and..." This is to make clear that it is the aerodrome operator that will identify the root cause.

response Accepted
The text was changed.

comment 86 comment by: CAA Norway
.AMC2-ADR.AR.C.010 (b), (h) on page 20: We suggest to change "They should... " to "***Aerodrome inspectors*** should..." We also suggest to move to GM all text after the first sentence, to put the examples into GM.

response Accepted

The text was changed, and example was moved to GM.

comment	306 comment by: <i>Danish Transport Authority</i> Focal point should be the aerodrome operator regardless of any provider of apron management service. Apron management service can be provided by an aerodrome ATS unit, by another aerodrome operating authority, or by a cooperative combination of these.
response	Noted Please be aware that this AMC is about nomination of focal points <u>inside</u> the competent authority for each aerodrome and apron management service providers.

comment	397 comment by: <i>Icelandic Civil Aviation Administration</i> As audits and inspections are inclusive in oversight it is suggested to reword as follows: "Oversight audits and inspections, ..."
response	Not accepted It is more likely that the word 'procedures' after oversight was forgotten (which would mirror the second title). Change was made.

comment	399 comment by: <i>Icelandic Civil Aviation Administration</i> We suggest to change AMC2-ADR.AR.C.010(b), (b)(8) on page 19 to "..the oversight by aerodrome operator of third parties, such as handling facilities, storage facilities and ..."
response	Partially accepted The Agency believes that the oversight over third parties and their compliance with the aerodrome manual is crucial. Therefore, it is good to include this in this list. It is, however warranting, an extra point. This is done in the new version of the AMC: <i>(23) operator's oversight of the compliance of the organisations operating or providing services at the aerodrome (third parties)</i> Please, see also the improved AMC on this matter on the OR side: AMC2 ADR.OR.D.025(b) Coordination with other relevant organisations.

comment	403 comment by: <i>Estonian CAA</i> We suggest to move AMC2-ADR.AR.C.010(b), (b) on page 19 to GM
response	Partially accepted This AMC is an overview of what an audit should contain, and is, therefore, AMC, not GM. It is a core element of an oversight system. The list is indicative as it is open to other elements depending on the aerodrome operations in question. However, the word 'indicative' should be exchanged with '...should include, but not be limited to...'.

comment	404	comment by: <i>Estonian CAA</i>
	We suggest to change AMC2-ADR.AR.C.010(b), (b)(8) on page 19 to "..the oversight by aerodrome operator of third parties, such as handling facilities, storage facilities and ..."	
response	Partially accepted	
	The Agency believes that the oversight over third parties and their compliance with the aerodrome manual is crucial. Therefore, it is good to include this in this list. It is, however warranting, an extra point. This is done in the new version of the AMC:	
	<i>(23) operator's oversight of the compliance of the organisations operating or providing services at the aerodrome (third parties)</i>	
	Please, see also the improved AMC on this matter on the OR side: AMC2 ADR.OR.D.025(b) Coordination with other relevant organisations.	
comment	405	comment by: <i>Estonian CAA</i>
	"We suggest to insert text in AMC2-ADR.AR.C.010 (b), (d) on page 20 ""assess the root cause(s) identified by the aerodrome operator and..." This is to make clear that it is the aerodrome operator that will identify the root cause."	
response	Accepted	
	The text was changed.	
comment	406	comment by: <i>Estonian CAA</i>
	"AMC2-ADR.AR.C.010 (b), (h) on page 20: We suggest to change ""They should... "" to ""Aerodrome inspectors should..." We also suggest to move to GM all text after the first sentence, to put the examples into GM."	
response	Accepted	
	The text was changed and example was moved to GM.	
comment	409	comment by: <i>Icelandic Civil Aviation Administration</i>
	We suggest to insert text in AMC2-ADR.AR.C.010 (b), (d) on page 20 "assess the root cause(s) identified by the aerodrome operator and..." This is to make clear that it is the aerodrome operator that will identify the root cause.	
response	Accepted	
	The text was changed.	

comment	410	comment by: <i>Icelandic Civil Aviation Administration</i>
	AMC2-ADR.AR.C.010 (b), (h) on page 20: We suggest to change "They should... " to "Aerodrome inspectors should..." We also suggest to move to GM all text after the first sentence, to put the examples into GM.	
response	Accepted	
	The text was changed and example was moved to GM.	
comment	640	comment by: <i>Finnish Transport Safety Agency</i>
	We suggest to move AMC2-ADR.AR.C.010(b), (b) on page 19 to GM. Reasoning: as it is only meant as an indicative list, and this is what it should be.	
response	Partially accepted	
	This AMC is an overview of what an audit should contain, and is, therefore, AMC, not GM. It is a core element of an oversight system. The list is indicative as it is open to other elements depending on the aerodrome operations in question. However, the word 'indicative' should be exchanged with '...should include but not be limited to...'	
comment	641	comment by: <i>Finnish Transport Safety Agency</i>
	We suggest to change AMC2-ADR.AR.C.010(b), (b)(8) on page 19 to "..the oversight by aerodrome operator of third parties, such as handling facilities, storage facilities and ..."	
response	Partially accepted	
	The Agency believes that the oversight over third parties and their compliance with the aerodrome manual is crucial. Therefore, it is good to include this in this list. It is, however warranting, an extra point. This is done in the new version of the AMC: <i>(23) operator's oversight of the compliance of the organisations operating or providing services at the aerodrome (third parties)</i> Please, see also the improved AMC on this matter on the OR side: AMC2 ADR.OR.D.025(b) Coordination with other relevant organisations.	
comment	642	comment by: <i>Finnish Transport Safety Agency</i>
	We suggest to insert text in AMC2-ADR.AR.C.010 (b), (d) on page 20 "assess the root cause(s) identified by the aerodrome operator and..." This is to make clear that it is the aerodrome operator that will identify the root cause.	
response	Accepted	
	The text was changed.	
comment	643	comment by: <i>Finnish Transport Safety Agency</i>

AMC2-ADR.AR.C.010 (b), (h) on page 20: We suggest to change "They should... " to "Aerodrome inspectors should..." We also suggest to move to GM all text after the first sentence, to put the examples into GM.

response Accepted

The text was changed and example was moved to GM.

comment 917 comment by: *NATS National Air Traffic Services Limited*

2 comments

1. There is duplication of "AMC2-ADR.AR.C.010(b)" – it is used twice. Suggest re-number and then re-order.

2. There are three AMC to ADR.AR.B.010(b) which are not three different ways of satisfying the IR, rather all must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merge the three AMC into a single AMC.

response *Partially accepted*

1. Agreed. Order was changed.

2. Not agreed. AMCs (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment 935 comment by: *NATS National Air Traffic Services Limited*

2 comments

1. There is duplication of "AMC2-ADR.AR.C.010(b)" – it is used twice. Suggest re-number and then re-order.

2. There are three AMC to ADR.AR.B.010(b) which are not three different ways of satisfying the IR, rather all must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the three AMC into a single AMC.

response Partially accepted

1. Agreed. Order was changed.

2. Not agreed. AMCs (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment 1121 comment by: *Danish Transport Authority*

	<p>The list shall be moved to GM. Its meant to be an indicative list as mentioned in the AMC and therefore should be moved to GM. And mentioned ealier under AMC4-ADR.AR.B.005(a)(2) the items on the list is unbalanced regarding to safety matters. Disabled aircraft removal should not be placed on the list. A lot of other safety related areas should be mentioned instead.</p>
response	<p>Partially accepted</p> <p>This AMC is an overview of what an audit should contain, and is, therefore, AMC, not GM. It is a core element of an oversight system. The list is indicative as it is open to other elements depending on the aerodrome operations in question. However, the word 'indicative' should be exchanged with '...should include but not be limited to...'</p> <p>On disabled aircraft:Not agreed. The arrangements at the aerodrome for the removal of disabled aircraft should also be reviewed. This is indepedent of who has to pay for such a removal if the case should occur. As per ICAO USOP audit protocol questions, it is, however, standard to have these arrangements described in the aerodrome manual and, therefore, the audit should cover it.</p> <p>On other elements:Noted. It would have been a good idea to share more items with the Agency.</p>
comment	<p>1123 comment by: Danish Transport Authority</p> <p>(b)(8): In continuation of ealier comments the item (b) (8) should be modified to "...the oversight by aerodrome operator of third parties, such as handling facilities, storage facilities and ..."</p>
response	<p>Partially accepted</p> <p>The Agency believes that the oversight over third parties and their compliance with the aerodrome manual is crucial. Therefore, it is good to include this in this list. It is, however warranting, an extra point. This is done in the new version of the AMC:</p> <p><i>(23) operator's oversight of the compliance of the organisations operating or providing services at the aerodrome (third parties)</i></p> <p>Please, see also the improved AMC on this matter on the OR side: AMC2 ADR.OR.D.025(b) Coordination with other relevant organisations.</p>
comment	<p>1124 comment by: Danish Transport Authority</p> <p>(h): EDITORIAL; "They should... " should be modified to "Aerodrome inspectors should..."</p>
response	<p>Accepted</p> <p>The text was changed and example was moved to GM.</p>
comment	<p>1125 comment by: Danish Transport Authority</p> <p>(h): Examples of trends should be moved to GM. The trends are guidance</p>

	for the aerodrome inspectors that discovered indicators could develop into a safety related issue.
response	Accepted The text was changed and example was moved to GM.

comment	<p>1158 comment by: <i>Federal Office of Civil Aviation FOCA</i></p> <p>AMC2-ADR.AR.C.010 (b) (a): Delete: "one of them (aerodrome inspectors) should have the overall responsibility.." Justification: FOCA has several inspectors with different responsibilities in terms of apron management. What happens if the focal point is absent?</p> <p>AMC2-ADR.AR.C.010(b): It is suggested to verify the financial and economic viability of each operator on the basis of a full scope approach prior to the issue of an approval or certificate and to perform a limited ongoing financial oversight during the period of operation.</p> <p>The full scope approach prior to issue of an approval or certificate could include measures such as:</p> <ul style="list-style-type: none">- Review of the most recent internal management accounts and, if available, audited accounts for the previous financial year.- Review of a detailed business plan including disclosure of mid-term financial expectations (budget, cash plan).- Review and disclosure of main assumptions related to projected costs and revenues.- Disclosure of existing and projected sources of finance.- Disclosure of shareholders. <p>The ongoing financial oversight could include measures such as:</p> <ul style="list-style-type: none">- Yearly audit/review of the financial planning.- Quarterly, biannually or yearly review of financial performance; differentiate the frequency of the review based on the size of the airport.- Yearly submission of audited financial statements to the oversight authority no later than six months following the last day of the respective financial year.- Obligation to notify the competent oversight authority of any important incidents/actions which could negatively or positively affect the financial situation.- Generally, the competent oversight authority should be able at any time to assess the financial performance of an operator by requesting the relevant information. <p>Whenever there are indications that financial problems exist or when insolvency or similar proceedings are opened against an operator the oversight authority should immediately assess the financial situation and on the basis of its findings increase the financial oversight measures or withdraw the approval or certificate.</p> <p>Justification: Generally, financial difficulties of an airport operator can be identified by the review and audit of financial information. To rely on trends which may indicate financial problems, as described in the article, is not considered as a sufficient oversight instrument. It is therefore suggested to verify the financial and economic viability of an operator prior to the issue of an approval or certificate and subsequent on an ongoing basis (quarterly, biannually or yearly). In case of financial problems, the oversight authority should increase the financial oversight or withdraw / suspend the approval or certificate (as a final measure).</p>
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	<p>AMC2-ADR.AR.C.010 (b), (h): FOCA suggests to change "They should... " to "Aerodrome inspectors should...". Furthermore, FOCA suggests to move to GM the integral text after the first sentence and to put the examples into GM.</p>
response	<p>Partially accepted</p> <p>Focal point: Not agreed. The Agency believes that the system of having one focal point is clearer to the overseen entities. Needless to say that the nominated focal point should have a backup focal point.</p> <p>Noted. The suggestions made here come close to a check for the financial and economic liability before the granting of a <u>commercial</u> aerodrome licence. But the this Regulation deals with safety. However, any national rules for such commercial licencing can coexist with the EASA rules.</p> <p>Move examples to GM: Agreed.</p>
comment	<p>1224 comment by: UK CAA</p> <p>Page No: 19-20</p> <p>Paragraph No: AMC2-ADR.AR.C.010(b) (b)(8) and (e)</p> <p>Comment: The auditing of storage facilities and the handling of dangerous goods may be undertaken by another section outside of the aerodrome section but within the competent authority.</p> <p>Justification: At the UK CAA, the oversight of dangerous goods is the responsibility of the Flight Operations Inspectorate, not the Aerodrome Standards Department. The same structure may exist in other competent authorities. The issue can easily be accommodated by changing the text within AMC2- ADR.AR.C.010(b) (e) to reflect that combined audits can be conducted with aerodrome inspectors from domains other than ATM/ANS.</p> <p>Proposed Text: (e) Inspections and audits may be conducted separately or in combination. Inspections and audits may also be coordinated with inspections and audits conducted by the competent authorities responsible for other areas to address areas of coordination between aerodrome operator and the provider of other services (e.g. ATM/ANS and Dangerous Goods). Inspections may, at the discretion of the competent authority, be conducted with or without prior notice to the aerodrome operator or the provider of apron management services.</p>
response	<p>Partially accepted</p> <p>Yes, the audits can be combined. However, dangerous goods is not a service. Wording cannot be agreed to here.</p>
comment	<p>1225 comment by: UK CAA</p>

Page No: 20

Paragraph No: AMC2-ADR-AR.C.010(b) (h) (2) & (5)

Comment: Delete item (2) 'delays in meeting payroll' and item (5) "withdrawal of credit by suppliers;"

Justification: Whereas the other items may fall within the aerodrome oversight by the competent authority as they may lead to a reduction in safety standards, the monitoring of delays in payroll and withdrawal of credit by suppliers would not have any safety impact and fall outside the scope of safety.

Proposed Text: DELETE (2) and (5)

response

Partially accepted

These items are valid indicators. They are now placed in GM.

comment

1414

comment by: *Swedish Transport Agency*

We suggest to move AMC2-ADR.AR.C.010(b), (b) on page 19 to GM.

response

Partially accepted

This AMC is an overview of what an audit should contain, and is, therefore, AMC, not GM. It is a core element of an oversight system. The list is indicative as it is open to other elements depending on the aerodrome operations in question. However, the word 'indicative' should be exchanged with '...should include but not be limited to...'

comment

1415

comment by: *Swedish Transport Agency*

We suggest to change AMC2-ADR.AR.C.010(b), (b)(8) on page 19 to "..the oversight by aerodrome operator of third parties, such as handling facilities, storage facilities and ..."

response

Partially accepted

The Agency believes that the oversight over third parties and their compliance with the aerodrome manual is crucial. Therefore, it is good to include this in this list. It is, however warranting, an extra point. This is done in the new version of the AMC:

(23) operator's oversight of the compliance of the organisations operating or providing services at the aerodrome (third parties)

Please, see also the improved AMC on this matter on the OR side: AMC2 ADR.OR.D.025(b) Coordination with other relevant organisations.

comment

1416

comment by: *Swedish Transport Agency*

We suggest to insert text in AMC2-ADR.AR.C.010 (b), (d) on page 20 "assess the root cause(s) identified by the aerodrome operator and..." This is to make clear that it is the aerodrome operator that will identify the root cause.

response Accepted
The text was changed.

comment 1417 comment by: *Swedish Transport Agency*
AMC2-ADR.AR.C.010 (b), (h). We suggest to change "They should... " to "Aerodrome inspectors should..."
We also suggest to move to GM all text after the first sentence, to put the examples into GM.

response Accepted
The text was changed and example was moved to GM.

comment 1748 comment by: *CAA CZ*
Comment by Karlovy Vary airport
We proposed new wording of whole paragraphs b) through e) :
„ADR.AR.C.010 – Oversight programme
(b) For each aerodrome, its operator and AMSP the oversight programme shall be developed taking into account the specific nature of the organisation, the complexity of its activities, the results of past certification and oversight activities and shall be based on the assessment of the associated risks. It shall include within each oversight planning cycle, meetings, audits and inspections, including unannounced inspections, as appropriate.

(c) For each aerodrome, its operator and AMSP an oversight planning cycle shall be established in accordance with AMC1-ADR.AR.C.010(c) but not exceeding 48 months.

(d) The oversight programme shall include records of the dates when meetings, audits and inspections are due and when such meetings, audits and inspections have been carried out.”

response Not accepted
Comment was misplaced. The Agency moved it to the relevant section in B I, under new number 3601.

(b): Not agreed. The Agency understands that CAA CZ suggests to combine the seemingly identical text for aerodromes, its operators, and Apron Management Service Providers; however, the texts under (b) and (d) for them are subtly different because the oversight programme for Apron Management Service Providers who declare their activity shall be only based on 'past oversight activities' while those of aerodromes and their operators shall be based on 'past certification and oversight activities'. This is because organisations who declare their activities (which the Member State has to first allow as a possibility as per Art. 8a 2(e) of the BR), are not subject to certification.

(c): Not agreed: The AMC cannot be mentioned in the IR as it would make it binding which is contrary to the legal character of an AMC.

(d): Partially agreed. Renumbering is not agreed because (b) and (d)

cannot be combined. Elimination of typo is agreed.

comment	1750	comment by: CAA CZ
	<p>Comment by Karlovy Vary airport We proposed new wording of whole paragraphs e) through f) : AMC2-ADR.AR.C.010(b) – Oversight programme (e) Inspections and audits may be conducted separately or in combination. Inspections and audits may also be coordinated with inspections and audits conducted by the competent authorities responsible for the areas of ATM/ANS to address areas of coordination between aerodrome operator and ATM services. Inspections may, at the discretion of the competent authority, be conducted with or without prior notice to the aerodrome operator or the provider of apron management services but their conduct shall not disrupt fluent and safe operation of the aerodrome.</p> <p>(f) Where it is apparent to an aerodrome inspector that an aerodrome operator or a provider of apron management services has permitted a breach of the applicable requirements, with the result that safety has been, or might have been compromised, the inspector should ensure that the responsible persons within the aerodrome SMS and competent authority are informed without delay.</p>	
response	Partially accepted	
	<p>(e): Partially agreed. The AMC was changed to say that 'Unannounced inspections should not disrupt fluent and safe operations of the aerodrome.'. In an AMC the word 'shall' must not be used.</p> <p>(f): Not agreed. It is not the inspectors role to ensure that the person in charge of the aerodromes SMS is informed. If such a breach does not' even after its detection' come to the knowledge of the SMS responsible, the whole SMS of that aerodrome is very dubious indeed.</p>	
comment	2291	comment by: Airport St. Gallen-Altenrhein - ACH/LSZR
	examples in (b) should be moved to GM	
response	Partially accepted	
	<p>This AMC is an overview of what an audit should contain, and is, therefore, AMC, not GM. It is a core element of an oversight system. The list is indicative as it is open to other elements depending on the aerodrome operations in question. However, the word 'indicative' should be exchanged with '...should include but not be limited to...'.</p>	
comment	2299	comment by: Airport St. Gallen-Altenrhein - ACH/LSZR
	Delete (h). This is a legal issue, in our case we are a privately owned company and legal obligations for disclosing finances are different from country to country. In our opinion EASA`s manadte is safety and this article does not belong here.	
response	Noted	
	This AMC is not saying that the audit will include a financial check. It says	

that note should be taken of indications suggesting financial difficulties as financial difficulties may put stress on the budgets for necessary maintenance.

comment	2302	comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i>
	Remove: "one of them (aerodrome inspectors) should have the overall responsibility..". Where different aspects of the operation are inspected by different departments of the authority, overall authority may not be possible.	
response	Not accepted	
	Focal point: Not agreed. The Agency believes that the system of having one focal point is clearer to the overseen entities. Needless to say that the nominated focal point should have a backup focal point, and that they do not need to be expert for all areas of aerodrome operations.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.010(b); (c) – Oversight programme

p. 21

comment	87	comment by: <i>CAA Norway</i>
	EASA must clarify what is meant by "At the conclusion of the audit" in AMC1-ADR.AR.C.010(b); (c), (c). If this means at the end of the audit, on site the aerodrome, it can not be expected that the whole report is ready yet! You can only expect the findings ready to be presented at the closing meeting, not the whole report. We suggest this to be reworded to reflect this.	
response	Not accepted	
	The conclusion of the audit is not the same as the end of the on-site inspection. Of course, at the end of the on-site inspection, only a draft audit report and a draft list of findings can be expected while at the end of an audit exercise, a whole final report is naturally expected.	
comment	407	comment by: <i>Estonian CAA</i>
	EASA must clarify what is meant by "At the conclusion of the audit" in AMC1-ADR.AR.C.010(b); (c), (c). If this means at the end of the audit, on site the aerodrome, it can not be expected that the whole report is ready yet! You can only expect the findings ready to be presented at the closing meeting, not the whole report. We suggest this to be reworded to reflect this.	
response	Not accepted	
	The conclusion of the audit is not the same as the end of the on-site inspection. Of course, at the end of the on-site inspection, only a draft	

audit report and a draft list of findings can be expected while at the end of an audit exercise, a whole final report is naturally expected.

comment

414

comment by: *Icelandic Civil Aviation Administration*

EASA must clarify what is meant by "At the conclusion of the audit" in AMC1-ADR.AR.C.010(b); (c), (c). If this means at the end of the audit, on site the aerodrome, it can not be expected that the whole report is ready yet! You can only expect the findings ready to be presented at the closing meeting, not the whole report. We suggest this to be reworded to reflect this.

response

Not accepted

The conclusion of the audit is not the same as the end of the on-site inspection. Of course, at the end of the on-site inspection, only a draft audit report and a draft list of findings can be expected while at the end of an audit exercise, a whole final report is naturally expected.

comment

644

comment by: *Finnish Transport Safety Agency*

EASA must clarify what is meant by "At the conclusion of the audit" in AMC1-ADR.AR.C.010(b); (c), (c). If this means at the end of the audit, on site the aerodrome, it can not be expected that the whole report is ready yet! You can only expect the findings ready to be presented at the closing meeting, not the whole report. We suggest this to be reworded to reflect this.

response

Not accepted

The conclusion of the audit is not the same as the end of the on-site inspection. Of course, at the end of the on-site inspection, only a draft audit report and a draft list of findings can be expected while at the end of an audit exercise, a whole final report is naturally expected.

comment

1126

comment by: *Danish Transport Authority*

EDITORIAL: It should be clarified that the audit report is completed after the closing meeting. The closing meeting covers the debriefing on the audit/inspection conclusions (findings, observations ect.) as pointed out under AMC1-ADR.AR.B.005(a)(2).

response

Not accepted

The conclusion of the audit is not the same as the end of the on-site inspection. Of course, at the end of the on-site inspection, only a draft audit report and a draft list of findings can be expected while at the end of an audit exercise, a whole final report is naturally expected.

comment

1159

comment by: *Federal Office of Civil Aviation FOCA*

AMC1-ADR.AR.C.010(b); (c): If by "At the conclusion of the audit" it is meant "at the end of the audit" on site the aerodrome, it can not be expected that the whole report is finished yet, only the presentation of the findings might be raised at that moment. The competent authority has to decide how and when to proceed with the conclusion of the audit.

response Not accepted

The conclusion of the audit is not the same as the end of the on-site inspection. Of course, at the end of the on-site inspection, only a draft audit report and a draft list of findings can be expected while at the end of an audit exercise, a whole final report is naturally expected.

comment 1418 comment by: *Swedish Transport Agency*

EASA must clarify what is meant by "At the conclusion of the audit" in AMC1-ADR.AR.C.010(b); (c). If this means at the end of the audit, on site the aerodrome, it can not be expected that the whole report is ready yet! You can only expect the findings ready to be presented at the closing meeting, not the whole report. We suggest this to be reworded.

response Not accepted

The conclusion of the audit is not the same as the end of the on-site inspection. Of course, at the end of the on-site inspection, only a draft audit report and a draft list of findings can be expected while at the end of an audit exercise, a whole final report is naturally expected.

comment 2288 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*

"At the conclusion of the audit" one can not expect the whole report to be ready, only a presentation of the findings to be raised.

response Not accepted

The conclusion of the audit is not the same as the end of the on-site inspection. Of course, at the end of the on-site inspection, only a draft audit report and a draft list of findings can be expected while at the end of an audit exercise, a whole final report is naturally expected.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM2-ADR.AR.C.010(b) – Oversight programme p. 21-22

comment 588 comment by: *Exeter International Airport*

GM3-ADR.AR.C.010(b) - More detail required, under what circumstances would an inspection without prior notice be expected?

response Noted

This is up to the competent authority to decide. European rules should make this possible as one the options that the competent authority has at its disposal.

comment 936 comment by: *NATS National Air Traffic Services Limited*

There is no GM1 so re-title to "GM1-ADR.AR.C.010(b)"

response Accepted
Naming and order of GM was changed.

comment 1280 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR — GM2-ADR.AR.C.010(b) – Oversight programme (p21-22)

2. Proposed text / comment

DGAC proposes to restructure this guidance material, without changing the wording, to ease its understanding:

"GM2-ADR.AR.C.010(b) – Oversight programme

INDUSTRY STANDARDS

(ea) In order to be able to credit any audits performed as part of certification in accordance with industry standards, the following should be considered:

- (1) the demonstration of compliance is based on certification auditing schemes providing for independent and systematic verification;*
- (2) the existence of an accreditation scheme and accreditation body for certification in accordance with the industry standards has been verified;*
- (3) certification audits are relevant to the requirements defined in Part-ADR.OR, Part ADR.OPS or other regulations as applicable;*
- (4) the scope of such certification audits can easily be mapped against the scope of oversight;*
- (5) audit results are accessible to the competent authority; and*
- (6) the audit planning intervals are compatible with the oversight planning cycle.*

(b) Demonstrated compliance with industry standards may not be considered in isolation from the other elements to be considered for the competent authority's risk-based oversight.

(ac) For aerodrome operators having demonstrated compliance with industry standards, the competent authority may adapt its oversight programme, in order to avoid duplication of audits."

3. Justification

The logic is that the authority first consider industry standards and decides whether it is pertinent or not, before the aerodrome operator uses the compliance to the standard to adapt the oversight programme.

response Partially accepted
Change of order: The (a) was kept in the initial order as the permission to accept industry standards rests with the competent authority.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM3-ADR.AR.C.010(b) – Oversight programme

p. 22

comment 939 comment by: NATS National Air Traffic Services Limited

2 comments

1. There is no GM1 so re-title to "GM2-ADR.AR.C.010(b)"
2. There are "should" this GM thus implying that they are AMC rather than GM. Suggest re-write removing "should".

response *Partially accepted*

1. Renaming of GM: Agreed. The order and naming of the GM was changed.
2. Use of 'should' in GM: Nowhere is it said that in GM the use of 'should' or 'may' is not allowed. In AMC and GM, 'may' and 'should' are sometimes appropriate. Furthermore, the Agency follows its style guide based on similar EU publications on writing conventions.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.015(a) – Initiation of the certification process p. 22

comment 941 comment by: NATS National Air Traffic Services Limited

2 comments

1. There is duplication of "AMC1-ADR.AR.C.015(a)" – it is used twice. Suggest re-number.
2. There are two AMC to ADR.AR.C.015(a) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merge the two AMC into a single AMC.

response *Partially accepted*

1. Agreed. The text was changed.
2. Not agreed. GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment 1681 comment by: Aéroport de Marseille - MRS/LFML

It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted

In the light of there no longer being an OR side requirement on the eligibility (old ADR.OR.B.010), the AMC on the AR side was abolished.

comment	1752	comment by: CAA CZ
	<p>We proposed new wording of whole paragraphs a) through c) : ADR.AR.C.015 — Initiation of certification process (a) Competent authority shall establish form and manner of the application for issuance of the certificate. Upon receiving an application for the initial issue of a certificate, the competent authority shall verify the applicant's compliance with the eligibility criteria of Article ADR.OR.B.010.</p> <p>(b) If the competent authority is satisfied that the applicant meets the eligibility criteria, it shall assess the application and notify the applicant of: (1) the established certification basis, in accordance with ADR.AR.C.020;</p> <p>(c) In case of an existing aerodrome, the competent authority shall prescribe the conditions under which the aerodrome operator shall operate during the certification period. The competent authority shall suspend the operation of the aerodrome if the aerodrome operator does not comply with the prescribed conditions. The competent authority shall inform the aerodrome operator in writing on expected schedule for certification process and conclude the certification within the shortest of time period practicable.</p>	
response	Partially accepted	
	<p>Comment was wrongly placed. The comment will now be under the comments to B I where it has the number 3602</p> <p>First addition on automatic suspension: Partially agreed. The change on the automatic suspension when operation under conditions is not followed was not taken on-board. However, the relevant OR rule under ADR.OR.B.020 was strengthened by adding the following paragraph (d):<i>As ADR.AR.C.015(c) in case of an existing aerodrome the aerodrome operator shall operate during the certification period under the conditions prescribed by the competent authority, unless the competent authority determines that the operation of the aerodrome needs to be suspended.</i></p> <p>Second addition on schedule: Agreed. The text was changed.</p>	
comment	2284	comment by: Airport St. Gallen-Altenrhein - ACH/LSZR
	the first five articles of "initiation of the certification process" are too complex. Move them to AMC or the GM.	
response	Noted	
	We are in the AMC here.Is comment misplaced?	
comment	2285	comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN
	<p>Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1) Initiation of the certification process</p> <p>Proposition/commentaire Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.</p>	

Justification

Traduction de courtoisie

It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted

In the light of there no longer being an OR side requirement on the eligibility (old ADR.OR.B.010), the AMC on the AR side was abolished.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.015(a) – Initiation of the certification process p. 22-23

comment 943 comment by: *NATS National Air Traffic Services Limited*

2 comments

1. There is duplication of "AMC1-ADR.AR.C.015(a)" – it is used twice. Suggest re-number.

2. There are two AMC to ADR.AR.C.015(a) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merge the two AMC into a single AMC.

response *Partially accepted*

1: Agreed. The text was changed.

2: Not agreed. AMCs (Acceptable Means of Compliance) or GM (Guidance Material) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment 1683 comment by: *Aéroport de Marseille - MRS/LFML*

It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted

In the light of there no longer being an OR side requirement on the eligibility (old ADR.OR.B.010), the AMC on the AR side was abolished.

comment 2286 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)
Initiation of the certification process

Proposition/commentaire

Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.

Justification

Traduction de courtoisie

It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response

Accepted

In the light of there no longer being an OR side requirement on the eligibility (old ADR.OR.B.010), the AMC on the AR side was abolished.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.015(b)(1);(2) – Initiation of the certification process p. 23-24

comment

69

comment by: Flughafen Düsseldorf GmbH

AMC1-ADR.AR.C.015(b)(1);(2) – Initiation of the certification process

NOTIFICATION OF CERTIFICATION BASIS

(a) Upon receipt of the application, the competent authority should examine and assess the content of the application and the related documentation, including the proposed certification specifications and any provisions for which compliance is proposed to be demonstrated in an alternative way that provides for an equivalent level of safety. (See also paragraph 1 (a) of AMC1-ADR.AR.C.035(a);(b)).

(b) The competent authority should establish the certification basis of the aerodrome, which should include:

(1) all certification specifications that it finds applicable to the aerodrome design and operation;

(2) any provision for which the competent authority is satisfied with the proposal and accepts the applicant to demonstrate an equivalent level of safety (ELOS) based on its application; and

(3) any special condition prescribed in accordance with ADR.AR.C.025, that the competent authority finds necessary[g1] to be included in the certification basis.

[g1]Hier sollte doch ein etwas objektiverer Maßstab gewählt werden (z.B. „as appropriate“)

response

Not accepted

The competent authority will, of course, justify a special condition that it finds necessary, as it is good administrative code of conduct. If it does not, the legal recourse would be

open to the applicant.

comment
t

668

comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR.AR.C.015(b)(1);(2)	Initiation of the certification process
Proposition/commentaire	(e)(1) L'AESA mentionne un « level of safety » de sécurité s'agit-il ?
Justification	
Traduction de courtoisie	(e) (1) The EASA mentions a level of safety: what is it about?

response

Noted

The Agency believes that Equivalent Level of Safety (ELSO) is a widely used term which does not need to be further defined. The general meaning of the term, as used in these draft rules, is that an equivalent level of safety exists when the competent authority has been satisfied by the applicant's demonstration that a particular way of demonstrating compliance (other than by complying to an Agency certification specification) with an essential requirement contained in Annex Va of the Basic Regulation, offers an equivalent level of protection with that of the Agency certification specification. The way of showing such compliance may differ from case to case, depending on the certification specification involved, and may also involve procedural means.

In such cases, the applicant proposes to the competent authority demonstration of compliance with the essential requirements of Annex Va without using the relevant applicable Agency certification specification(s) which would otherwise be part of the certification basis.

It is also to be noted that the term is used in related ICAO material, including the aerodrome certification manual (see ICAO Doc 9774 Appendix 3 – Technical Analysis).

comment

770

comment by: *Union des Aéroports français - UAF*

Attachment [#18](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.AR.C.015(b)(1);(2)

Référence: Initiation of the certification process AMC1-ADR.AR.C.015(b)(1);(2)

Traduction de courtoisie
(e) (1) The EASA mentions a level of safety: what level of safety is it about?

response

Noted

The Agency believes that Equivalent Level of Safety (ELoS) is a widely used term which does not need to be further defined.
 The general meaning of the term, as used in these draft rules, is that an equivalent level of safety exists when the competent authority has been satisfied by the applicant's demonstration that a particular way of demonstrating compliance (other than by complying to an Agency certification specification) with an essential requirement contained in Annex Va of the Basic Regulation, offers an equivalent level of protection with that of the Agency certification specification. The way of showing such compliance may differ from case to case, depending on the certification specification involved, and may also involve procedural means.
 In such cases, the applicant proposes to the competent authority demonstration of compliance with the essential requirements of Annex Va without using the relevant applicable Agency certification specification(s) which would otherwise be part of the certification basis.

It is also to be noted that the term is used in related ICAO material, including the aerodrome certification manual (see ICAO Doc 9774 Appendix 3 – Technical Analysis).

comment 944 comment by: *NATS National Air Traffic Services Limited*

There are six AMC to ADR.AR.C.015(b);(1) which are not six different ways of satisfying the IR, rather all six must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the five AMC into a single AMC.

response Noted

GM (Guidance Material) or AMC (Acceptable Means of compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment 1297 comment by: *Euroairport Bâle-Mulhouse*

Attachment [#19](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.AR.C.015(b)(1);(2)

Référence: AMC1-ADR.AR.C.015(b)(1);(2)
 Initiation of the certification process

Traduction de courtoisie
 (e) (1) The EASA mentions a level of safety: what level of safety is it about?

response Noted

The Agency believes that Equivalent Level of Safety (ELoS) is a widely used term which does not need to be further defined.
 The general meaning of the term, as used in these draft rules, is that an equivalent level of safety exists when the competent authority has been satisfied by the applicant's demonstration that a particular way of

demonstrating compliance (other than by complying to an Agency certification specification) with an essential requirement contained in Annex Va of the Basic Regulation, offers an equivalent level of protection with that of the Agency certification specification. The way of showing such compliance may differ from case to case, depending on the certification specification involved, and may also involve procedural means. In such cases, the applicant proposes to the competent authority demonstration of compliance with the essential requirements of Annex Va without using the relevant applicable Agency certification specification(s) which would otherwise be part of the certification basis.

It is also to be noted that the term is used in related ICAO material, including the aerodrome certification manual (see ICAO Doc 9774 Appendix 3 – Technical Analysis).

comment 1667 comment by: *Aéroport de Marseille - MRS/LFML*
 (e) (1) The EASA mentions a level of safety: what level of safety is it about?

response Noted

The Agency believes that Equivalent Level of Safety (ELoS) is a widely used term which does not need to be further defined. The general meaning of the term, as used in these draft rules, is that an equivalent level of safety exists when the competent authority has been satisfied by the applicant's demonstration that a particular way of demonstrating compliance (other than by complying to an Agency certification specification) with an essential requirement contained in Annex Va of the Basic Regulation, offers an equivalent level of protection with that of the Agency certification specification. The way of showing such compliance may differ from case to case, depending on the certification specification involved, and may also involve procedural means. In such cases, the applicant proposes to the competent authority demonstration of compliance with the essential requirements of Annex Va without using the relevant applicable Agency certification specification(s) which would otherwise be part of the certification basis.

It is also to be noted that the term is used in related ICAO material, including the aerodrome certification manual (see ICAO Doc 9774 Appendix 3 – Technical Analysis).

comment 1684 comment by: *Aéroport de Marseille - MRS/LFML*
 It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Noted

The AMC gives instruction on how to establish the certification basis, and which CSs should be considered. These are important procedural aspects that the competent authorities have to follow, and which give legal certainty to the applicants.

comment 1712 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

	Attachment #20
	UAF NPA 2011-20 (B.II) AMC1-ADR.AR.C.015(b)(1);(2)
	Référence: Initiation of the certification process AMC1-ADR.AR.C.015(b)(1);(2)
	Traduction de courtoisie (e) (1) The EASA mentions a level of safety: what level of safety is it about?
response	<p>Noted</p> <p>The Agency believes that Equivalent Level of Safety (ELoS) is a widely used term which does not need to be further defined. The general meaning of the term, as used in these draft rules, is that an equivalent level of safety exists when the competent authority has been satisfied by the applicant's demonstration that a particular way of demonstrating compliance (other than by complying to an Agency certification specification) with an essential requirement contained in Annex Va of the Basic Regulation, offers an equivalent level of protection with that of the Agency certification specification. The way of showing such compliance may differ from case to case, depending on the certification specification involved, and may also involve procedural means. In such cases, the applicant proposes to the competent authority demonstration of compliance with the essential requirements of Annex Va without using the relevant applicable Agency certification specification(s) which would otherwise be part of the certification basis.</p> <p>It is also to be noted that the term is used in related ICAO material, including the aerodrome certification manual (see ICAO Doc 9774 Appendix 3 – Technical Analysis).</p>

comment	<p>1819 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #21</p> <p>ADBM - NPA 2011-20 (B.II) AMC1-ADR.AR.C.015(b)(1);(2)</p> <p>Référence: Initiation of the certification process AMC1-ADR.AR.C.015(b)(1);(2)</p> <p>Traduction de courtoisie (e) (1) The EASA mentions a level of safety: what level of safety is it about?</p>
response	<p>Noted</p> <p>The Agency believes that Equivalent Level of Safety (ELoS) is a widely used term which does not need to be further defined. The general meaning of the term, as used in these draft rules, is that an equivalent level of safety exists when the competent authority has been satisfied by the applicant's demonstration that a particular way of demonstrating compliance (other than by complying to an Agency certification specification) with an essential requirement contained in Annex Va of the Basic Regulation, offers an equivalent level of protection</p>

with that of the Agency certification specification. The way of showing such compliance may differ from case to case, depending on the certification specification involved, and may also involve procedural means.

In such cases, the applicant proposes to the competent authority demonstration of compliance with the essential requirements of Annex Va without using the relevant applicable Agency certification specification(s) which would otherwise be part of the certification basis.

It is also to be noted that the term is used in related ICAO material, including the aerodrome certification manual (see ICAO Doc 9774 Appendix 3 – Technical Analysis).

comment 2287 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)	Initiation of the certification process
Proposition/commentaire	Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.
Justification	
Traduction de courtoisie	It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response *Noted*

The AMC give instructions on how to establish the certification basis and which CSs should be considered. These are important procedural aspects that the competent authorities have to follow, and which give legal certainty to the applicants.

comment 2300 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence: AMC1- ADR.AR.C.015(b)(1);(2)	Initiation of the certification process
Proposition/commentaire	(e)(1) L'AESA mentionne un « level of safety » : de quel niveau de sécurité s'agit-il ?
Justification	
Traduction de courtoisie	(e) (1) The EASA mentions a level of safety: what level of safety is it about?

response *Noted*

The Agency believes that Equivalent Level of Safety (ELoS) is a widely used term which does not need to be further defined.
The general meaning of the term, as used in these draft rules, is that an equivalent level of safety exists when the competent authority has been

satisfied by the applicant's demonstration that a particular way of demonstrating compliance (other than by complying to an Agency certification specification) with an essential requirement contained in Annex Va of the Basic Regulation, offers an equivalent level of protection with that of the Agency certification specification. The way of showing such compliance may differ from case to case, depending on the certification specification involved, and may also involve procedural means.

In such cases, the applicant proposes to the competent authority demonstration of compliance with the essential requirements of Annex Va without using the relevant applicable Agency certification specification(s) which would otherwise be part of the certification basis.

It is also to be noted that the term is used in related ICAO material, including the aerodrome certification manual (see ICAO Doc 9774 Appendix 3 - Technical Analysis).

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process p. 24

comment

686

comment by: ADP : Aeroports de Paris

Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)	Initiation of the certification process
Proposition/commentaire	Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.
Justification	
Traduction de courtoisie	It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response

Accepted

The AMC was changed so that it says that the competent authority needs to ensure the determination of the elevation of the aeronautical beacons if these are operationally necessary. The reference to the CS in question was changed to CS-ADR-DSN.M.620.

AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process
NOTIFICATION OF CERTIFICATION BASIS - DETERMINATION OF ELEVATION OF AERONAUTICAL BEACONS

If such beacons are operationally necessary, the competent authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS-ADR-DSN.M.620, is determined.

comment	<p>772 comment by: <i>Union des Aéroports français - UAF</i></p> <p>Attachment #22</p> <p>UAF NPA 2011-20 (B.II) AMC 1 à 5 – ADR.AR.C.015 (b) ;(1)</p> <p>Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1) Initiation of the certification process</p> <p>Traduction de courtoisie It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.</p>
response	<p><i>Accepted</i></p> <p>The AMC was changed so that it says that the competent authority needs to ensure the determination of the elevation of the aeronautical beacons, if these are operationally necessary. The reference to the CS in question was changed to CS-ADR-DSN.M.620.</p> <p>AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process NOTIFICATION OF CERTIFICATION BASIS - DETERMINATION OF ELEVATION OF AERONAUTICAL BEACONS</p> <p>If such beacons are operationally necessary, the competent authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS-ADR-DSN.M.620, is determined.</p>
comment	<p>945 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>There are six AMC to ADR.AR.C.015(b);(1) which are not six different ways of satisfying the IR, rather all six must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the five AMC into a single AMC.</p>
response	<p>Noted</p> <p>GM (Guidance Material) or AMC (Acceptable Means of compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.</p>
comment	<p>949 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>The content of this AMC does not relate to the associated IR (ADR.AR.C.015(b);(1) – Initiation of the certification process).</p>
response	<p><i>Partially accepted</i></p> <p>The title of the AMC was now made clearer so that the CB is mentioned. The aeronautical beacons, if operationally required, are part of the CB.</p>
comment	<p>1128 comment by: <i>Danish Transport Authority</i></p> <p>The determination of the beacons elevation should be moved to CS-ADR-DSN.M.620 under general (a). The elevation is part of the assessment of</p>

using beacons and the following requirements described under the CS article. Not only AMC1-ADR.AR.C.015, but also AMC2 to AMC5-ADR-AR.C.015 should be moved back to their respective CSs. In B.III the use of the term "appropriate authority" and other similar terms are still used throughout the document . Examples: GM-ADR-DSN.B.030 — Runway threshold (e (6) use of appropriate authority ; GM-ADR-DSN.B.085 — Runway strength (e ; GM-ADR-DSN.C.210 — Runway end safety areas (b) (5) use of "the state aviation authority"; GM-ADR-DSN.J.475 — Non-precision approach runways (a) ect.

response

Not accepted

Move back to CS: Not agreed.

The respective CSs are the technical part while the AMCs in question are the associated action, assessment, verification, and determination by the competent authority if so required. It is not appropriate to put this action only at the level of the CS because there is possibly an action by a competent authority involved. However, the titles of the AMCs were made clearer so that the CB is mentioned. Please also note that the AMCs were made more neutral as to who performs the action. The competent authority has to only ensure the action, if required, is done. Also, the term 'competent authority' leaves it open to other appropriate authorities, as long as it is done.

Example of how the AMCs were changed:

AMC1-ADR.AR.C.015(b);(1) — Initiation of the certification process
 NOTIFICATION OF CERTIFICATION BASIS - DETERMINATION OF
 ELEVATION OF AERONAUTICAL BEACONS

If such beacons are operationally necessary the competent authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS-ADR-DSN.M.620, is determined.

'Appropriate authority': Noted. It is not clear what the comment wants to say where it refers to B III.

comment

1160

comment by: *Federal Office of Civil Aviation FOCA*

Remove the five provisions with "initiation of the certification process" and relocate them elsewhere in the AMC or the GM. All these articles do not deal with/ do not cover the initiation of the certification process and are far too detailed in this respect.

response

Partially accepted

The titles of the AMCs were made clearer so that the CB is mentioned. The determinations in the AMCs are, if provided, part of the CB and thus belong under ADR.AR.C.015(b);(1) — Initiation of the certification process.

Please also note that they are not articles, but Acceptable Means of Compliance, which were also made more neutral as to who performs the action. The competent authority has to ensure the action, if required, is done. Also the term competent authority leaves it open to other appropriate authorities, as long as it is done.

Example of how the AMCs were changed:

AMC1-ADR.AR.C.015(b);(1) — Initiation of the certification process

NOTIFICATION OF CERTIFICATION BASIS - DETERMINATION OF ELEVATION OF AERONAUTICAL BEACONS

If such beacons are operationally necessary, the competent authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS-ADR-DSN.M.620, is determined.

comment

1281

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC2-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC3-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC4-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC5-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)

2. Justification and proposed text / comment

The AMCs proposed for ADR.AR.C.015, in AMC 1 to 5 – ADR-AR.C.015(b);(1) are related to tasks which are usually performed by the aerodrome operator, but allocate them to the competent authority. There is a strong lack of flexibility in these 5 AMCs and there is **no hook in ADR.AR.C.015**.

Moreover, they are far too much detailed and too technical for AR, which generally relates to the process: technical points are covered by CS and sometimes by IR OPS.

This point is critical and not consistent with how things are done on aerodromes. The competent authority verifies CS are well applied when auditing the aerodrome operator.

It is proposed to remove **these AMC from the AR and to insert the related technical specifications in the CS, when they are not already**, and to write them beginning by "*the aerodrome operator should determine*", **or in the passive form**. By doing that, the competent authority will formally give acceptance of the related items when the CB will be examined and approved.

response

Partially accepted

Action performed by the aerodrome operator: Partially agreed.

The respective CSs are the technical part while the AMCs in question are the associated action, assessment, verification, and determination by the, or another, competent authority if so required. It is not appropriate to put this only at the level of the CS because there is possibly an action assessment, verification, and determination involved. Please also note that the AMCs were made more neutral as to who performs the action, assessment, verification, and determination. The competent authority has to only ensure the action, if required, is done. Also, the term 'competent authority' leaves it open to other appropriate authorities, as long as it is done.

Lacking legal hook: Partially agreed.
The titles of the AMCs were made clearer so that the CB is mentioned. The determinations mentioned here would, if required, go into the CB, so it is the right place.

Example of how the AMCs were changed:

AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process
NOTIFICATION OF CERTIFICATION BASIS - DETERMINATION OF
ELEVATION OF AERONAUTICAL BEACONS

If such beacons are operationally necessary, the competent authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS-ADR-DSN.M.620, is determined.

comment 1290 comment by: Euroairport Bâle-Mulhouse

Attachment [#23](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC 1 à 5 – ADR.AR.C.015 (b) ;(1)

Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)
Initiation of the certification process

Traduction de courtoisie

It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted

The AMC was changed so that it says that the competent authority needs to ensure the determination of the elevation of the aeronautical beacons if these are operationally necessary. The reference to the CS in question was changed to CS-ADR-DSN.M.620.

AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process
NOTIFICATION OF CERTIFICATION BASIS - DETERMINATION OF
ELEVATION OF AERONAUTICAL BEACONS

If such beacons are operationally necessary, the competent authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS-ADR-DSN.M.620, is determined.

comment 1686 comment by: Aéroport de Marseille - MRS/LFML

It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted

The AMC was changed so that it says that the competent authority needs to ensure the determination of the elevation of the aeronautical beacons if these are operationally necessary. The reference to the CS in question was changed to CS-ADR-DSN.M.620.

AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process
NOTIFICATION OF CERTIFICATION BASIS - DETERMINATION OF
ELEVATION OF AERONAUTICAL BEACONS

If such beacons are operationally necessary, the competent authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS-ADR-DSN.M.620, is determined.

comment 1898 comment by: *Irish Aviation Authority*
Comment: there is a cross reference error: the identification beacon described in CS-ADR-DSN.M.620

response Noted
 Reference was changed.

comment 2293 comment by: *CAA Norway*
 We suggest to move the five articles AMC1-AMC5 to ADR.AR.C.015 (b);(1) back to their respective CS. They do not fit in with the initiation of the certification process.

response Not accepted
 It is not appropriate to put this only at the level of the CS, because there is possibly an action assessment, verification, and determination involved. Please also note that the AMCs were made more neutral as to who performs the action, assessment, verification, and determination. The competent authority has to only ensure the action, if required, is done. Also the term 'competent authority' leaves it open to other appropriate authorities, as long as it is done.
 Example of how the AMCs were changed:
AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process
 NOTIFICATION OF CERTIFICATION BASIS - DETERMINATION OF ELEVATION OF AERONAUTICAL BEACONS
 If such beacons are operationally necessary, the competent authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS-ADR-DSN.M.620, is determined.

comment 2679 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*
 Attachment [#24](#)
 ADBM - NPA 2011-20 (B.II) AMC 1 à 5 – ADR.AR.C.015 (b) ;(1)
 Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)
 Initiation of the certification process
 Traduction de courtoisie
 It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted
 The AMC was changed so that it says that the competent authority needs

to ensure the determination of the elevation of the aeronautical beacons if these are operationally necessary. The reference to the CS in question was changed to CS-ADR-DSN.M.620.

AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process
NOTIFICATION OF CERTIFICATION BASIS - DETERMINATION OF ELEVATION OF AERONAUTICAL BEACONS

If such beacons are operationally necessary, the competent authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS-ADR-DSN.M.620, is determined.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC2-ADR.AR.C.015(b);(1) – Initiation of the certification process

p. 24

comment

686 ❖

comment by: *ADP : Aeroports de Paris*

Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)	Initiation of the certification process
Proposition/commentaire	Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.
Justification	
Traduction de courtoisie	It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response

Accepted

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment

950

comment by: *NATS National Air Traffic Services Limited*

The content of this AMC does not relate to the associated IR (ADR.AR.C.015(b);(1) – Initiation of the certification process).

response

Accepted

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment

1281 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC2-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC3-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC4-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC5-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)

2. Justification and proposed text / comment

The AMCs proposed for ADR.AR.C.015, in AMC 1 to 5 – ADR-AR.C.015(b);(1) are related to tasks which are usually performed by the aerodrome operator, but allocate them to the competent authority. There is a strong lack of flexibility in these 5 AMCs and there is **no hook in ADR.AR.C.015**.

Moreover, they are far too much detailed and too technical for AR, which generally relates to the process: technical points are covered by CS and sometimes by IR OPS.

This point is critical and not consistent with how things are done on aerodromes. The competent authority verifies CS are well applied when auditing the aerodrome operator.

It is proposed to remove **these AMC from the AR and to insert the related technical specifications in the CS, when they are not already**, and to write them beginning by "*the aerodrome operator should determine*", or in the **passive form**. By doing that, the competent authority will formally give acceptance of the related items when the CB will be examined and approved.

response Accepted
This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment 1687 comment by: *Aéroport de Marseille - MRS/LFML*
It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted
This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment 2294 comment by: *CAA Norway*
We suggest to move the five articles AMC1-AMC5 to ADR.AR.C.015 (b);(1) back to their respective CS. They do not fit in with the initiation of the certification process.

response Accepted

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC3-ADR.AR.C.015(b);(1) – Initiation of the certification process p. 24

comment 121 comment by: CAA-NL

We suggest to make separate requirements for requiring a secondary power supply for obstacle lights on the aerodrome and in the surrounding of the aerodrome.

There is no legal basis for the requirement in this AMC requiring a secondary power supply for obstacle lights in the surroundings of the aerodrome in the basic regulation or the implementing rule from the AR part and we suggest to delete this requirement. A secondary power supply is an expansive provision and there is no legal basis for the competent authority to enforce the installation of a secondary power supply on existing obstacles with obstacle lights having only a primary power supply. There is a danger the government has to pay for the installation of an additional secondary power supply because of this requirement.

response Accepted

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment 686 ❖ comment by: ADP : Aeroports de Paris

Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)	Initiation of the certification process
Proposition/commentaire	Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.
Justification	
Traduction de courtoisie	It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment	946	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are six AMC to ADR.AR.C.015(b);(1) which are not six different ways of satisfying the IR, rather all six must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the five AMC into a single AMC.	
response	Accepted	This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.
comment	951	comment by: <i>NATS National Air Traffic Services Limited</i>
	The content of this AMC does not relate to the associated IR (ADR.AR.C.015(b);(1) – Initiation of the certification process).	
response	Accepted	This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.
comment	1281 ❖	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none">• AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)• AMC/GM to ANNEX I – Part-AR – AMC2-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)• AMC/GM to ANNEX I – Part-AR – AMC3-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)• AMC/GM to ANNEX I – Part-AR – AMC4-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)• AMC/GM to ANNEX I – Part-AR – AMC5-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)	
	<u>2. Justification and proposed text / comment</u>	
	The AMCs proposed for ADR.AR.C.015, in AMC 1 to 5 – ADR-AR.C.015(b);(1) are related to tasks which are usually performed by the aerodrome operator, but allocate them to the competent authority. There is a strong lack of flexibility in these 5 AMCs and there is no hook in ADR.AR.C.015 .	
	Moreover, they are far too much detailed and too technical for AR, which generally relates to the process: technical points are covered by CS and sometimes by IR OPS.	
	This point is critical and not consistent with how things are done on aerodromes. The competent authority verifies CS are well applied when auditing the aerodrome operator.	
	It is proposed to remove these AMC from the AR and to insert the	

related technical specifications in the CS, when they are not already, and to write them beginning by "*the aerodrome operator should determine*", **or in the passive form**. By doing that, the competent authority will formally give acceptance of the related items when the CB will be examined and approved.

response *Accepted*

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment 1688 comment by: *Aéroport de Marseille - MRS/LFML*

It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response *Accepted*

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment 2295 comment by: *CAA Norway*

We suggest to move the five articles AMC1-AMC5 to ADR.AR.C.015 (b);(1) back to their respective CS. They do not fit in with the initiation of the certification process.

response *Accepted*

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC4-ADR.AR.C.015(b);(1) – Initiation of the certification process

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comment 686 ❖ comment by: *ADP : Aeroports de Paris*

Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)	Initiation of the certification process
Proposition/commentaire	Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.
Justification	
Traduction de courtoisie	It appears that the points asked in these AMC do not concern necessarily

	the competence of the competent authority.
response	Accepted This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.
comment	947 comment by: <i>NATS National Air Traffic Services Limited</i> There are six AMC to ADR.AR.C.015(b);(1) which are not six different ways of satisfying the IR, rather all six must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the five AMC into a single AMC.
response	Accepted This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.
comment	952 comment by: <i>NATS National Air Traffic Services Limited</i> The content of this AMC does not relate to the associated IR (ADR.AR.C.015(b);(1) – Initiation of the certification process).
response	Partially accepted
comment	1226 comment by: <i>UK CAA</i> Page No: 24 Paragraph No: AMC4-ADR.AR.C.015(b);(1) Comment: CS-ADR-DSN.S.900 and CS-ADR-DSN.S.905 do not exist. Suggest delete reference. Justification: Accuracy. Proposed Text: DELETE AMC4-ADR.AR.C.015(b);(1)
response	Accepted This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.
comment	1281 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i> <u>1. Affected paragraphs</u>

- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC2-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC3-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC4-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC5-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)

2. Justification and proposed text / comment

The AMCs proposed for ADR.AR.C.015, in AMC 1 to 5 – ADR-AR.C.015(b);(1) are related to tasks which are usually performed by the aerodrome operator, but allocate them to the competent authority. There is a strong lack of flexibility in these 5 AMCs and there is **no hook in ADR.AR.C.015**.

Moreover, they are far too much detailed and too technical for AR, which generally relates to the process: technical points are covered by CS and sometimes by IR OPS.

This point is critical and not consistent with how things are done on aerodromes. The competent authority verifies CS are well applied when auditing the aerodrome operator.

It is proposed to remove **these AMC from the AR and to insert the related technical specifications in the CS, when they are not already**, and to write them beginning by "*the aerodrome operator should determine*", or in the **passive form**. By doing that, the competent authority will formally give acceptance of the related items when the CB will be examined and approved.

response Accepted
This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment 1689 comment by: *Aéroport de Marseille - MRS/LFML*
It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted
This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment 2296 comment by: *CAA Norway*
We suggest to move the five articles AMC1-AMC5 to ADR.AR.C.015 (b);(1) back to their respective CS. They do not fit in with the initiation of the certification process.

response Accepted

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC5-ADR.AR.C.015(b);(1) – Initiation of the certification process p. 24

comment	686 ❖	comment by: <i>ADP : Aeroports de Paris</i>								
	<table border="1"> <tr> <td>Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)</td> <td>Initiation of the certification process</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.</td> </tr> <tr> <td>Justification</td> <td></td> </tr> <tr> <td>Traduction de courtoisie</td> <td>It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.</td> </tr> </table>	Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)	Initiation of the certification process	Proposition/commentaire	Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.	Justification		Traduction de courtoisie	It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.	
Référence: AMC 1 à 5 – ADR.AR.C.015 (b) ; (1)	Initiation of the certification process									
Proposition/commentaire	Il apparaît que les points demandés dans ces AMC ne relèvent pas forcément de la compétence de l'autorité compétente.									
Justification										
Traduction de courtoisie	It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.									

response Accepted
This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment	948	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are six AMC to ADR.AR.C.015(b);(1) which are not six different ways of satisfying the IR, rather all six must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the five AMC into a single AMC.	

response Noted
GM (Guidance Material) or AMC (Acceptable Means of compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment	953	comment by: <i>NATS National Air Traffic Services Limited</i>
	The content of this AMC does not relate to the associated IR (ADR.AR.C.015(b);(1) – Initiation of the certification process).	

response Accepted

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment 1281 ❖ comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC2-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC3-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC4-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)
- AMC/GM to ANNEX I — Part-AR — AMC5-ADR.AR.C.015(b);(1) – Initiation of the certification process (p24)

2. Justification and proposed text / comment

The AMCs proposed for ADR.AR.C.015, in AMC 1 to 5 – ADR-AR.C.015(b);(1) are related to tasks which are usually performed by the aerodrome operator, but allocate them to the competent authority. There is a strong lack of flexibility in these 5 AMCs and there is **no hook in ADR.AR.C.015**.

Moreover, they are far too much detailed and too technical for AR, which generally relates to the process: technical points are covered by CS and sometimes by IR OPS.

This point is critical and not consistent with how things are done on aerodromes. The competent authority verifies CS are well applied when auditing the aerodrome operator.

It is proposed to remove **these AMC from the AR and to insert the related technical specifications in the CS, when they are not already**, and to write them beginning by "*the aerodrome operator should determine*", **or in the passive form**. By doing that, the competent authority will formally give acceptance of the related items when the CB will be examined and approved.

response Accepted

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment 1690 comment by: Aéroport de Marseille - MRS/LFML

It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority.

response Accepted

This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.

comment	1963	comment by: Pau Pyrénées Airport - PUF/LFBP
	It appears that the points asked in these AMC do not concern necessarily the competence of the competent authority. (e) (1) The EASA mentions a level of safety: what level of safety is it about?	
response	Accepted	
	This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.	
comment	2297	comment by: CAA Norway
	We suggest to move the five articles AMC1-AMC5 to ADR.AR.C.015 (b);(1) back to their respective CS. They do not fit in with the initiation of the certification process.	
response	Accepted	
	This ACM was abolished. No action by an appropriate authority is needed. All that is needed can be done during the normal process of the establishment of the certification basis.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.015(c) – Initiation of the certification process

p. 25

comment	307	comment by: Danish Transport Authority
	The certification period should be GM. It will be a large unnecessary burden for the competent authority if a relatively large number of existing certified aerodromes apply at the same time. Conversion shall be carried out within 48 months. It will be the competent authority to decide and handle the conversions in mutual agreement with the aerodromes.	
response	Accepted	
	This is made into GM. However, do take note that this is not necessarily about the conversion of existing certificates, but also applies to any airport that moves into the scope, and has to be granted a certificate for the first time.	
comment	1227	comment by: UK CAA
	Page No: 25	
	Paragraph No: AMC1-ADR.AR.C.015(c)	
	Comment: The intent of this AMC is not clear. Does it mean the certificate should not be valid for longer than 18 months when it is issued, or does it mean that	

the certificate should be issued within 18 months of the initial application?

Justification: The intention of this text needs to be clarified.

Proposed Text: "The certification process for an existing aerodrome should not exceed 18 months from initial submission of an application to the issue of the certificate under these rules".

response Partially accepted

This AMC was meant for non-newly built aerodromes to have legal certainty that the certification will take place within 18 months from filing of the application to the granting of the certificate. This was made GM, and made clearer.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM1-ADR.AR.C.015 – Initiation of the certification process

p. 25

comment 954 comment by: *NATS National Air Traffic Services Limited*

There are "should" in this GM thus implying that they are AMC rather than GM. Suggest rewriting removing "should".

response Not accepted

Use of 'should' in GM: Nowhere is it said that in GM the use of 'should' or 'may' is not allowed. In AMC and GM 'may' and 'should' are sometimes appropriate. Furthermore, the Agency follows its style guide based on similar EU publications on writing conventions.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM2-ADR.AR.C.015(b) (1);(2) – Initiation of the certification process

p. 25

comment 955 comment by: *NATS National Air Traffic Services Limited*

The content of this GM does not relate to the associated IR (ADR.AR.C.015(b)(1);(2)). The heading of this GM (Certification basis – proposals for equivalent level of safety) appears to relate to ADR.AR.C.020. Suggest amend to "GM2-ADR.AR.C.020"

response Not accepted

Not agreed. The GM is just right. It relates to ADR.AR.C.015(b) (1);(2) – Initiation of the certification process, and, therefore, indirectly to ADR.AR.C.020 also via its clause under (b)(1) which refers to all of ADR.AR.C.020, where under (b) the ELSO is mentioned.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.035(a)(2) – Issuance of certificate p. 26

comment	<p>249 comment by: <i>CAA Norway</i></p> <p>This amc is not necessary as this is covered elsewhere; in AMC1.ADR.AR.C.040(f) (also ADR.OR.B.045, ADR.OR.D005 and its amc's and gm's, for example the gm on safety assessments.) This text is not good and biased so please delete it.</p>
response	<p>Partially accepted</p> <p>Partially agreed. The Agency downgraded this to a GM and renamed it to GMC1-ADR.AR.C.035 (a) – Issuance of certificate EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.</p> <p>Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety sssessments have to be evaluated by the Competent Authority:</p> <p>(1) When such safety sssessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);</p> <p>(2) When such safety sssessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the Competent Authority can request any inspection, test, safety assessment. or exercise.;</p> <p>(3) When such safety sssessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and</p> <p>(4) When such safety sssessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.</p> <p>Generally: The Agency has changed the order of paragraphs under ADR.AR.c.035, so please be mindful if the AMC/GM references have changed.</p>

comment	<p>297 comment by: <i>CAA Austria - Ministry of Transport</i></p> <p>(a) The competent authority should validate the conclusion of a safety assessment, provided by the aerodrome operator to ensure compliance with the applicable requirements (see ADR.OR.B.065) - wrong reference</p>
response	<p>Accepted</p>

The reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. However, it was since integrated into ADR.OR.040(f).

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/GM references have changed.

comment

416

comment by: *Icelandic Civil Aviation Administration*

This amc is not necessary as this is covered elsewhere in AMC1.ADR.AR.C.040(f) (also ADR.OR.B.045, ADR.OR.D005 and its amc's and gm's, for example the gm on safety assessments.) This text is not good and biased so pls delete it.

response

Partially accepted

Partially agreed. The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) — Issuance of certificate EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.C.035, so please be mindful if the AMC/GM references have changed.

comment

419

comment by: *Icelandic Civil Aviation Administration*

Suggest a change in the heading as follows: "Safety Assessments Provided By The Aerodrome Operator For An Approval" The article contradicts the basic function of an sms that not all safety assessments are subject to an approval of the competent authority. Such a requirement would undermine the function of an sms and work against the day-to-day use of safety assessments, particularly for other safety concerns then major

	changes.
response	<p>Partially accepted</p> <p>Partially agreed. EASA downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) — Issuance of certificate EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.</p> <p>Looking at ADR.AR.C.035 and other rules, there are at least four occasions when then safety assessments have to be evaluated by the Competent Authority:</p> <p>(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);</p> <p>(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the Competent Authority can request any inspection, test, safety assessment or exercise.</p> <p>(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c);</p> <p>(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.</p> <p>Generally: EASA has changed the order of paragraphs under ADR.AR.C.035, so please be mindful if the AMC/GM references have changed.</p>
comment	<p>421 <i>comment by: Icelandic Civil Aviation Administration</i></p> <p>AMC1-ADR.AR.C.035 (a)(2), (a) - Strongly opposed to this. The competent authority will only validate specific safety assessments, those which are conducted for changes that are required to be submitted for an approval. All other safety assessments are generally not assessed nor validated by the competent authority. The work load would be enormous as safety assessments take place on every day basis at an aerodrome with an effective safety management system. Suggest to reword a like this: "The competent authority, if validating a safety assessment, should validate the conclusion of that safety assessment, provided ..." The reference to ADR.OR.B.065 is also wrong (045 would be the one, however OR.045 is now OR.045 (f)).</p>
response	<p><i>Partially accepted</i></p> <p>Partially agreed. The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) — Issuance of certificate EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.</p> <p>Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:</p>

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.c.035, so please be mindful if the AMC/ GM references have changed.

comment

422

comment by: *Icelandic Civil Aviation Administration*

AMC1-ADR.AR.C.035 (a)(2), (b) - Only some safety assessments are subject for an approval, so this wording is strongly protested as it would work against normal use of safety assessments on every day basis. Suggest rewording: "The CA should analyse safety assessment that are subject to an approval and in particular ..."

response

Accepted

The Agency made this GM and changed (b) such as to say that:

(b) The competent authority should evaluate the conclusion of a submitted safety assessment, provided by the aerodrome operator to ensure compliance with the relevant requirement for the operator on how to assess changes (see ADR.OR.B.040 (f)).

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/GM references have changed.

comment

424

comment by: *Icelandic Civil Aviation Administration*

AMC1-ADR.AR.C.035 (a)(2), (c) - Only some safety assessments are subject for an approval, so this wording is strongly protested as it would work against normal use of safety assessments on every day basis. Suggest rewording: "give approval to the aerodrome operator for a safety assessment requiring an approval and the ..."

response

Partially accepted

Partially agreed. EASA made this GM but sees no need for many wording changes here as the cases of submitted safety assessments are now already made clear in the title and text of the GM. In (c) there is only this little change:

(c) After its evaluation the competent authority should either:

Generally: EASA may change the order of the points in the relevant IR, so please be mindful if the AMC/GM references have changed.

comment 425 comment by: *Icelandic Civil Aviation Administration*
AMC1-ADR.AR.C.035 (a)(2), (e) - Only some safety assessments are subject for an approval, so this wording is strongly protested as it would work against normal use of safety assessments on every day basis. Suggest rewording: "...if such approvals are required."

response Partially accepted
The Agency see no further need for wording changes here as the cases of submitted safety assessments are already made clear in the title and text of the GM.
Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/GM references have changed.

comment 531 comment by: *Flughafen Düsseldorf GmbH*
Ist der Bezug hier wirklich richtig? Muss jedes Safety Assessment der Behörde zugesendet werden und ab wann muss ein Safety Assessment gemacht werden?
Es muss klare Vorgaben geben, wie ein Assessment auszusehen hat und ob hierzu Gutachter beauftragt werden müssen. Diese Funktion ist bisher in dieser Form nicht vorhanden. Es muss klar sein, dass das nicht die Aufgabe des Safety Managers sein kann.
Im ICAO SMM ist lediglich von "risk assessment" die Rede. **Dies ist auch eher als konzerninternes Mittel zur Beurteilung und Bewertung von Gefährdungen und Risiken zu sehen und keinesfalls als Meldewesen an die jeweilige Aufsichtsbehörde.** Dies würde dem Gedanken des SMS – Probleme intern offen zu behandeln und zu beseitigen entgegenstehen. Auch die genaue Kontrolle und Beurteilung des Safety Assessment durch die Behörde bürdet dem SMS einen Zwang zur genauen Meldung und Einhaltung auf, was dem offenen Safety Gedanken nicht gerade dienlich ist. Die unter b) gelisteten Aufgaben entsprechen laut SMM eher den Aufgaben der Safety Action Group und nicht den Aufgaben der Aufsichtsbehörde.
Auch der Fakt, dass ein Safety Assessment, sofern man es analog SMM verstehen will, vorab von der Behörde genehmigt werden muss, ist nicht gerade effizient. Insbesondere wenn es darum geht Safety Mängel schnellst möglichst zu beseitigen, kann es bei Einbindung und vorheriger Genehmigung durch die Aufsichtsbehörde zu kritischen Zeitverzögerungen kommen!

response Partially accepted
The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) – Issuance of certificate EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A

REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.c.035, so please be mindful if the AMC/GM references have changed.

comment	550	comment by: <i>Vienna International Airport</i>
	(a) wrong reference	
response	Accepted	
	Agreed: the reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. However, it was since integrated into ADR.OR.040(f).	
	Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/GM references have changed.	

comment	645	comment by: <i>Finnish Transport Safety Agency</i>
	This amc is not necessary as this is covered elsewhere; in AMC1.ADR.AR.C.040(f) (also ADR.OR.B.045, ADR.OR.D005 and its amc's and gm's, for example the gm on safety assessments.) This text is not good and biased so please delete it.	
response	Partially accepted	
	Partially agreed. The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) — Issuance of certificate EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH	

ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.C.035, so please be mindful if the AMC/GM references have changed.

comment

646

comment by: *Finnish Transport Safety Agency*

We strongly disagree with this. The competent authority will only validate specific safety assessments; those which are conducted for changes that are required to be submitted for an approval. All other safety assessments are generally not assessed nor validated by the competent authority. The work load would be enormous as safety assessments take place on every day basis at an aerodrome with an effective safety management system. We suggest to reword (a) like this: "The competent authority, if validating a safety assessment, should validate the conclusion of that safety assessment, provided ..."

response

Partially accepted

Partially agreed. The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) — Issuance of certificate
EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an

aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.c.035, so please be mindful if the AMC/GM references have changed.

comment

647

comment by: *Finnish Transport Safety Agency*

AMC1-ADR.AR.C.035 (a)(2), (b) Only some safety assessments are subject for an approval, so we do not agree in this wording as it would work against normal use of safety assessments on every day basis. Suggested rewording: "The CA should analyse safety assessment that are subject to an approval and in particular ..."

response

Accepted

The Agency made this GM and changed (b) such as to say that:

(b) The competent authority should evaluate the conclusion of a submitted safety assessment, provided by the aerodrome operator to ensure compliance with the relevant requirement for the operator on how to assess changes (see ADR.OR.B.045). However, it was since integrated into ADR.OR.040(f).

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/GM references have changed.

comment

648

comment by: *Finnish Transport Safety Agency*

AMC1-ADR.AR.C.035 (a)(2), (c) Only some safety assessments are subject for an approval, so we do not agree in this wording as it would work against normal use of safety assessments on every day basis. We suggest rewording: "-give approval to the aerodrome operator for a safety assessment requiring an approval and ..."

response

Partially accepted

Partially agreed. The Agency made this GM, but sees no need for wording changes here as the cases of submitted safety assessments are already made clear in the title and text of the GM. In (c) only the little change:

(c) 'After its evaluation the competent authority should either:'

Generally: The Agency may change the order of the points in the relevant

IR, so please be mindful if the AMC/ GM references have changed.

comment 649 comment by: *Finnish Transport Safety Agency*
AMC1-ADR.AR.C.035 (a)(2), (e) Only some safety assessments are subject for an approval, so we do not agree in this wording as it would work against normal use of safety assessments on every day basis. We suggest rewording: "...if such approvals are required."

response Partially accepted
The Agency sees no further need for wording changes here as the cases of submitted safety assessments are already made clear in the title and text of the GM.
Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 957 comment by: *NATS National Air Traffic Services Limited*
The content of this AMC refer to ADR.OR.B.065 which is "Termination of operation". ADR.OR.B.025 does refer to safety assessments. Suggest amend text "(see ADR.OR.B.065)" to "(see ADR.OR.B.025)".

response Accepted
The reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. However, it was since integrated into ADR.OR.040(f).
Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 1129 comment by: *Danish Transport Authority*
EDITORIAL: The reference to ADR.OR.B.065 deals with termination of an aerodrome. Reference should be revised.

response Accepted
The reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. However, it was since integrated into ADR.OR.040(f).
Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 1165 comment by: *Salzburger Flughafen GmbH*
(a) wrong reference

response Accepted
Agreed: the reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. However, it was since integrated into ADR.OR.040(f).

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 1283 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR - AMC1.ADR.AR.C.035(a)(2) — Issuance of certificate – SAFETY ASSESSMENTS PROVIDED BY THE AERODROME OPERATOR (page 26)

2. Justification and proposed text / comment

This AMC does not seem directly related to this IR and seems to be more linked to safety assessments.

Moreover, it should be mentioned that it only applies to the approval of the ELOS thanks to safety assessments.

In addition, there is apparently a mistake in the reference in (a): it is proposed to change this reference.

Finally, there is a mistake in the last point of (b) ("the any associated actions") : it is proposed to replace it by "the proposed associated actions" (as used in the first point of (c))

Proposal :

1/ Modify (a) to add a reference to ELOS and have the adequate reference :

- add, after "safety assessment": "for an ELOS"
- replace "~~see ADR.OR.B.065~~" by "~~see ADR.OR.B.025~~"

2/ in (b) : replace "the any associated actions" by "the proposed associated actions"

response Partially accepted

Partially Agreed. The reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. It was not meant to be ADR.OR.B.025. But ADR.OR.B.045 was since integrated into ADR.OR.B.040 as point (f).

The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) — Issuance of certificate EVALUATION OF SAFETY ASSESSMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an

aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Replace: Agreed. Text was changed to say: 'the proposed associated action'.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/GM references have changed.

comment

1391

comment by: *Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH*

(a) wrong reference

response

Accepted

Agreed: the reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. But ADR.OR.B.045 was integrated into ADR.OR.B.040 as point (f).

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment

1460

comment by: *Flughafen Graz Betriebs GmbH*

(a) wrong reference

response

Accepted

Agreed: the reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. But ADR.OR.B.045 was integrated into ADR.OR.B.040 as point (f).

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment

1520

comment by: *Flughafen Graz Betriebs GmbH*

Ist der Bezug hier wirklich richtig? Muss jedes Safety Assessment der Behörde zugesendet werden, ab wann muss ein Safety Assessment gemacht werden?

Es muss klare Vorgaben geben, wie ein Assessment auszusehen hat und ob hierzu Gutachter beauftragt werden müssen. Diese Funktion ist bisher

in dieser Form nicht vorhanden. Es muss klar sein, dass das nicht die Aufgabe des Safety Managers sein kann.

Im ICAO SMM ist lediglich von risk assessment die Rede. **Dies ist auch eher als konzerninternes Mittel zur Beurteilung und Bewertung von Gefährdungen und Risiken zu sehen und keinesfalls als Meldewesen an die jeweilige Aufsichtsbehörde.** Dies würde dem Gedanken des SMS – Probleme intern offen zu behandeln und zu beseitigen entgegenstehen. Auch die genaue Kontrolle und Beurteilung des Safety Assessment durch die Behörde bürdet dem SMS einen Zwang zur genauen Meldung und Einhaltung auf, was dem offenen Safety Gedanken nicht gerade dienlich ist. Die unter b) gelisteten Aufgaben entsprechen laut SMM eher den Aufgaben der Safety Action Group, nicht den Aufgaben der Aufsichtsbehörde.

Auch der Fakt, dass ein Safety Assessment, sofern man es analog SMM verstehen will, vorab von der Behörde genehmigt werden muss, ist nicht gerade effizient. Insbesondere wenn es darum geht Safety Mängel schnellst möglichst zu beseitigen, kann es bei Einbindung und vorheriger Genehmigung durch die Aufsichtsbehörde zu kritischen Zeitverzögerungen kommen !

response

Partially accepted

The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) – Issuance of certificate
EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.c.035, so please be mindful if the AMC/ GM references have changed.

On list (b) under old AMC1-ADR.AR.C.035(a)(2) now GM1 – ADR.AR.C.035 **(a)**:Not agreed.

The authority should have criteria as to how to evaluate a safety

assessment. The fact that these may be consistent with those used also by the Safety Action Group is not relevant, but shows that the evaluation is consistent.

comment

1569

comment by: CAA Norway

We suggest a change in the heading as follows: "Safety **Assessments Provided By The Aerodrome Operator For An Approval**" The article contradicts the basic function of an sms that not all safety assessments are subject to an approval of the competent authority. Such a requirement would undermine the function of an sms and work against the day-to-day use of safety assessments, particularly for other safety concerns then major changes.

response

Partially accepted

Partially agreed. The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) — Issuance of certificate EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.c.035, so please be mindful if the AMC/GM references have changed.

comment

1575

comment by: CAA Norway

AMC1-ADR.AR.C.035 (a)(2), (a): We strongly disagree with this. The competent authority will only validate specific safety assessments; those which are conducted for changes that are required to be submitted for an approval. Most other safety assessments are generally not assessed nor

validated by the competent authority. The work load would be enormous as safety assessments take place on every day basis at an aerodrome with an effective safety management system. We suggest to reword (a) like this: "**When validating a safety assessment, the competent authority** should validate the conclusion of that safety assessment, provided ..."

response

Partially accepted

Partially agreed. The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) — Issuance of certificate
EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.C.035, so please be mindful if the AMC/GM references have changed.

comment

1579

comment by: CAA Norway

AMC1-ADR.AR.C.035 (a)(2), (b): Only some safety assessments are subject for an approval, so we do not agree in this wording as it would work against normal use of safety assessments on every day basis. Suggested rewording: "The CA should analyse safety assessment **that are subject to an approval** and in particular ..."

response

Accepted

The Agency made this GM and changed (b) such as to say that:
(b) The competent authority should evaluate the conclusion of a submitted safety assessment provided by the aerodrome operator to ensure compliance with the relevant requirement for the operator on how to assess changes (see ADR.OR.B.045). But ADR.OR.B.045 was integrated into ADR.OR.B.040 as point (f).

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment	1580	comment by: CAA Norway
	Only some safety assessments are subject for an approval, so we do not agree in this wording as it would work against normal use of safety assessments on every day basis. We suggest rewording: "-give approval to the aerodrome operator for a safety assessment requiring an approval and ..."	
response	Partially accepted	
	Partially agreed. The Agency made this GM but sees no need for wording changes here as the cases of submitted safety assessments are already made clear in the title and text of the GM. In (c) only the little change: '(c) <u>After its evaluation</u> the competent authority should either:'	
	Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.	

comment	1581	comment by: CAA Norway
	AMC1-ADR.AR.C.035 (a)(2), (e): Only some safety assessments are subject for an approval, so we do not agree in this wording as it would work against normal use of safety assessments on every day basis. We suggest rewording: "... if such approvals are required. "	
response	Partially accepted	
	The Agency sees no further need for wording changes here as the cases of submitted safety assessments are already made clear in the title and text of the GM.	
	Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.	

comment	1613	comment by: Flughafen Linz-Hörsching - LNZ/LOWL
	(a) wrong reference	
response	Accepted	
	Agreed: the reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. But ADR.OR.B.045 was integrated into ADR.OR.B.040 as point (f).	
	Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.	

comment	1785	comment by: AESA - Agencia Estatal de Seguridad Aérea
	The reference ADR.OR.B.065 is wrong.	
response	Accepted	

Agreed: the reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. But ADR.OR.B.045 was integrated into ADR.OR.B.040 as point (f).

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 2183 comment by: *Flughafen Klagenfurt*

(a) wrong reference

response Accepted

Agreed: the reference in the AMC, now GM, was corrected. The correct reference is ADR.OR.B.045 Assessment of changes. But ADR.OR.B.045 was integrated into ADR.OR.B.040 as point (f).

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 2349 comment by: *BMVBS - Federal Ministry of Transport, Building and Urban Development*

The relationship between the nominated person and the authority is not fully clear. It is assumed that the nominated person would be a person on the authority's side.

response Noted

Comment is not correctly placed.

Old AMC1-ADR.AR.C.035(a)(2) — Issuance of certificate, now AMC1-ADR.AR.C.035(b) — Issuance of certificate does not refer to a nominated person.

AMC1-ADR.AR.C.035(a);(b) now (c) — Issuance of certificate does so, and, indeed, yes, that person would be a nominated person acting as focal point for the applicant.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 2519 comment by: *ADV -German Airports Association*

AMC1-ADR.AR.C.035(a)(2) — Issuance of certificate

SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR

(a) The competent authority should validate the conclusion of a safety assessment, provided by the aerodrome operator to ensure compliance with the applicable requirements (see ADR.OR.B.065).

(b) The competent authority should analyse the safety assessment and in particular make sure that:

- the identified safety concern(s) has/have been assessed through the safety assessment process and is/are adequately documented.
- an appropriate coordination has been performed between the parties affected by the safety concern(s);

- the assessment covers the whole system and the interactions of its elements;
 - the hazards have been properly identified and the level of risk assessed;
 - the proposed mitigation measures are adequate and consistent with the objective of reducing the identified level of risk and the safety objectives, if relevant;
 - the timeframes of the planned implementation of the any associated actions are appropriate.
- (c) The competent authority should either:
- give approval to the aerodrome operator for the safety assessment and the proposed associated actions, such as mitigation measures;
 - coordinate with the aerodrome operator to reach an agreement on revised mitigation measures if some risks have been underestimated or have not been identified; or
 - impose additional measures or reject the proposal if no agreement can be reached.

Ist der Bezug hier wirklich richtig? Muss jedes Safety Assessment der Behörde zugesendet werden, ab wann muss ein Safety Assessment gemacht werden?

Es muss klare Vorgaben geben, wie ein Assessment auszusehen hat und ob hierzu Gutachter beauftragt werden müssen. Diese Funktion ist bisher in dieser Form nicht vorhanden. Es muss klar sein, dass das nicht die Aufgabe des Safety Managers sein kann.

Im ICAO SMM ist lediglich von risk assessment die Rede. **Dies ist auch eher als konzerninternes Mittel zur Beurteilung und Bewertung von Gefährdungen und Risiken zu sehen und keinesfalls als Meldewesen an die jeweilige Aufsichtsbehörde.** Dies würde dem Gedanken des SMS – Probleme intern offen zu behandeln und zu beseitigen entgegenstehen. Auch die genaue Kontrolle und Beurteilung des Safety Assessment durch die Behörde bürdet dem SMS einen Zwang zur genauen Meldung und Einhaltung auf, was dem offenen Safety Gedanken nicht gerade dienlich ist. Die unter b) gelisteten Aufgaben entsprechen laut SMM eher den Aufgaben der Safety Action Group, nicht den Aufgaben der Aufsichtsbehörde.

Auch der Fakt, dass ein Safety Assessment, sofern man es analog SMM verstehen will, vorab von der Behörde genehmigt werden muss, ist nicht gerade effizient. Insbesondere wenn es darum geht Safety Mängel schnellst möglichst zu beseitigen, kann es bei Einbindung und vorheriger Genehmigung durch die Aufsichtsbehörde zu kritischen Zeitverzögerungen kommen !

response

Partially accepted

The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) – Issuance of certificate
EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.c.035, so please be mindful if the AMC/GM references have changed.

On list (b) under old AMC1-ADR.AR.C.035(a)(2) now GM1 – ADR.AR.C.035 **(a)**:Not agreed.

The authority should have criteria as to how to evaluate a safety assessment. The fact that these may be consistent with those used also by the Safety Action Group is not relevant but shows that the evaluation is consistent.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment

2550

comment by: MST / STR - Stuttgart Airport

AMC1-ADR.AR.C.035(a)(2) — Issuance of certificate
SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR

(a) The competent authority should validate the conclusion of a safety assessment, provided by the aerodrome operator to ensure compliance with the applicable requirements (see ADR.OR.B.065).

(b) The competent authority should analyse the safety assessment and in particular make sure that:

the identified safety concern(s) has/have been assessed through the safety assessment process and is/are adequately documented.

an appropriate coordination has been performed between the parties affected by the safety concern(s);

- the assessment covers the whole system and the interactions of its elements;
- the hazards have been properly identified and the level of risk assessed;
- the proposed mitigation measures are adequate and consistent with the objective of reducing the identified level of risk and the safety objectives, if relevant;
- the timeframes of the planned implementation of the any associated actions are appropriate.

(c) The competent authority should either:

- give approval to the aerodrome operator for the safety assessment

- and the proposed associated actions, such as mitigation measures;
- coordinate with the aerodrome operator to reach an agreement on revised mitigation measures if some risks have been underestimated or have not been identified; , or
- impose additional measures or reject the proposal if no agreement can be reached.

Ist der Bezug hier wirklich richtig? Muss jedes Safety Assessment der Behörde zugesendet werden, ab wann muss ein Safety Assessment gemacht werden?

Es muss klare Vorgaben geben, wie ein Assessment auszusehen hat und ob hierzu Gutachter beauftragt werden müssen. Diese Funktion ist bisher in dieser Form nicht vorhanden. Es muss klar sein, dass das nicht die Aufgabe des Safety Managers sein kann.

Im ICAO SMM ist lediglich von risk assessment die Rede. **Dies ist auch eher als konzerninternes Mittel zur Beurteilung und Bewertung von Gefährdungen und Risiken zu sehen und keinesfalls als Meldewesen an die jeweilige Aufsichtsbehörde.** Dies würde dem Gedanken des SMS – Probleme intern offen zu behandeln und zu beseitigen entgegenstehen. Auch die genaue Kontrolle und Beurteilung des Safety Assessment durch die Behörde bürdet dem SMS einen Zwang zur genauen Meldung und Einhaltung auf, was dem offenen Safety Gedanken nicht gerade dienlich ist. Die unter b) gelisteten Aufgaben entsprechen laut SMM eher den Aufgaben der Safety Action Group, nicht den Aufgaben der Aufsichtsbehörde.

Auch der Fakt, dass ein Safety Assessment, sofern man es analog SMM verstehen will, vorab von der Behörde genehmigt werden muss, ist nicht gerade effizient. Insbesondere wenn es darum geht Safety Mängel schnellst möglichst zu beseitigen, kann es bei Einbindung und vorheriger Genehmigung durch die Aufsichtsbehörde zu kritischen Zeitverzögerungen kommen !

response

Partially accepted

The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) — Issuance of certificate
EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, safety assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings

at the initial certification of an aerodrome following ADR.AR.C.035 (c); and
(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.c.035, so please be mindful if the AMC/GM references have changed.

On list (b) under old AMC1-ADR.AR.C.035(a)(2) now GM1 – ADR.AR.C.035 **(a)**:Not agreed.

The authority should have criteria as to how to evaluate a safety assessment. The fact that these may be consistent with those used also by the Safety Action Group is not relevant but shows that the evaluation is consistent.

comment

2615

comment by: *ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen*

AMC1-ADR.AR.C.035(a)(2) – Issuance of certificate (a)

Ist der Bezug hier wirklich richtig? Muss jedes Safety Assessment der Behörde zugesendet werden, ab wann muss ein Safety Assessment gemacht werden?

response

Partially accepted

The Agency downgraded this to a GM and renamed it to GMC1 ADR.AR.C.035 (a) – Issuance of certificate
EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

Looking at ADR.AR.C.035 and other rules, there are, at least, four occasions when the safety assessments have to be evaluated by the competent authority:

(1) When such safety assessment is accompanying a request by an aerodrome for acceptance of an ELoS at the initial certification of an aerodrome following ADR.AR.C.035 (a)(2);

(2) When such safety assessment is requested by the authority at the initial certification of an aerodrome following ADR.AR.C.035 (b), where it is said that the competent authority can request any inspection, test, Safety Assessment. or exercise.;

(3) When such safety assessment is required in relation to open findings at the initial certification of an aerodrome following ADR.AR.C.035 (c); and

(4) When such safety assessment is accompanying a request by an aerodrome for approval of a change that requires prior approval following

ADR.OR.B.040.

Generally: The Agency has changed the order of paragraphs under ADR.AR.c.035, so please be mindful if the AMC/GM references have changed.

On list (b) under old AMC1-ADR.AR.C.035(a)(2) now GM1 – ADR.AR.C.035 (a):Not agreed.

The authority should have criteria as to how to evaluate a safety assessment. The fact that these may be consistent with those used also by the Safety Action Group is not relevant but shows that the evaluation is consistent.

comment

2616

comment by: *ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen*

AMC1-ADR.AR.C.035(a)(2) – Issuance of certificate
SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR

Es muss klare Vorgaben geben, wie ein Assessment auszusehen hat und ob hierzu Gutachter beauftragt werden müssen. Diese Funktion ist bisher in dieser Form nicht vorhanden. Es muss klar sein, dass das nicht die Aufgabe des Safety Managers sein kann.

response

Partially accepted

On doing safety assessment: Partially agreed.
Please look at **GM2-ADR.OR.D.005 (b)(4) – Management - SAFETY ASSESSMENT FOR RISK MANAGEMENT**

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment

2617

comment by: *ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen*

AMC1-ADR.AR.C.035(a)(2) – Issuance of certificate
SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR

Im ICAO SMM ist lediglich von risk assessment die Rede. **Dies ist auch eher als konzerninternes Mittel zur Beurteilung und Bewertung von Gefährdungen und Risiken zu sehen und keinesfalls als Meldewesen an die jeweilige Aufsichtsbehörde.** Dies würde dem Gedanken des SMS – Probleme intern offen zu behandeln und zu beseitigen entgegenstehen. Auch die genaue Kontrolle und Beurteilung des Safety Assessment durch die Behörde bürdet dem SMS einen Zwang zur genauen Meldung und Einhaltung auf, was dem offenen Safety Gedanken nicht gerade dienlich ist. Die unter b) gelisteten Aufgaben entsprechen laut SMM eher den Aufgaben der Safety Action Group, nicht den Aufgaben der Aufsichtsbehörde.

Auch der Fakt, dass ein Safety Assessment, sofern man es analog SMM verstehen will, vorab von der Behörde genehmigt werden muss, ist nicht gerade effizient. Insbesondere wenn es darum geht Safety Mängel

	<p>schnellst möglichst zu beseitigen, kann es bei Einbindung und vorheriger Genehmigung durch die Aufsichtsbehörde zu kritischen Zeitverzögerungen kommen !</p>
<p>response</p>	<p>Not accepted</p> <p>Not agreed. The word 'risk assessment' should not be used. It is only an element of the process. It is more appropriate to use safety assessment . Safety assessment is in fact a 'risk management procedure'. Risk management according to ICAO (A14 and SMM) is:</p> <ol style="list-style-type: none"> 1. Hazard Identification 2. Risk assessment and mitigation. <p>Risk assessment is one of the elements in 2. And not the whole risk management procedure.</p> <p>On doing safety assessment: Partially agreed. Please look at GM2-ADR.OR.D.005 (b)(4) – Management - SAFETY ASSESSMENT FOR RISK MANAGEMENT. This GM may evolve a little more.</p> <p>On list (b) under old AMC1-ADR.AR.C.035(a)(2) now GMC1 – ADR.AR.C.035 (a):Not agreed. The authority should have criteria as to how to evaluate a safety assessment. The fact that these may be consistent with those used also by the Safety Action Group is not relevant, but shows that the evaluation is consistent.</p> <p>Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.035(a);(b) – Issuance of certificate p. 27-28</p>
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<p>comment</p>	<p>70 comment by: Flughafen Düsseldorf</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 5%;"></td> <td style="width: 5%;">(v)</td> <td>adequacy of facilities with regard to the applicant's scope of work.</td> </tr> <tr> <td></td> <td>(5)</td> <td>in case of non-compliance, the applicant should be informed in writing of the corrections or supplements which are required.</td> </tr> </table> <p>(b) (b) The competent authority should ensure that standardised and approved methods and tools are used by its personnel during the process described in paragraph 1.</p> <p>(c) (c) In cases where an application for a certificate is refused, the applicant should be informed of the right of appeal as exist under national regulations.</p> <p>(d) (d) Prior to issuing the certificate(s) the competent authority may require the conduct of one or more flights at the aerodrome, as well as any other test, or exercise it <u>finds necessary</u>[g1]</p> <p>(e) (e) When the verification process is complete, the competent authority should issue the certificate(s) and ensure the publication of the certification status of the aerodrome</p>		(v)	adequacy of facilities with regard to the applicant's scope of work.		(5)	in case of non-compliance, the applicant should be informed in writing of the corrections or supplements which are required.
	(v)	adequacy of facilities with regard to the applicant's scope of work.					
	(5)	in case of non-compliance, the applicant should be informed in writing of the corrections or supplements which are required.					

aeronautical information publication.

[g1]Hier sollte doch ein etwas objektiverer Maßstab gewählt werden (z.B. „as appropriate“)

response

Not accepted

The competent authority will, of course, justify any test and exercise that it finds necessary. It is good administrative code of conduct. If it does not, the legal recourse would be open to the applicant.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment

179

comment by: Zürich Airport

Referring to para. (e)

Please give details, in which part of the AIP the certification status should be published.

response

Noted

Annex 15 requires the status of certification to be published in the AIP under AD 1.5, where it says:

AD. 1.5 Status of certification of aerodromes

A list of aerodromes in the State, indicating the status of certification, including:

- 1.) Aerodrome name and ICAO location indicator
- 2.) Date and if applicable, validity of certification; and
- 3.) Remarks if any.

Furthermore, the promulgation of the certification status is an ICAO standard in Annex 14 under 2.13.1.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment

1229

comment by: UK CAA

Page No: 27

Paragraph No: AMC1-ADR.AR.C.035(a);(b);(a) (4) (ii)

Comment: Too much emphasis on the names and qualifications of personnel.

Justification: The accountable manager, as the only nominated person, should be the subject of a qualification verification, but it should not include all personnel.

Proposed Text: (ii) the applicant's management system and its organisation, including: detailed management structure; **[DELETE "including names and qualifications of personnel"]** adequacy of the organisation and management structure, including allocated resources and numbers of personnel allocated by the applicant to key management tasks and other positions. Care should be taken to verify that the system is comprehensive and is likely to be effective. Of particular importance is a

	<p>careful review of the qualifications of the applicant's nominated persons. Account should be taken of the relevance of the nominee's previous experience and known record;</p>
response	<p>Partially accepted</p> <p>The accountable manager is not the only nominated personnel as per ADR.OR.D.015. There are others. Please see the relevant section there.</p> <p>About text proposal: This related to the submission of the qualifications of the nominated persons whose suitability is to be reviewed, is mentioned later on in the same AMC.</p> <p>Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/GM references have changed.</p>
comment	<p>1282 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.035 (a);(b) — Issuance of certificate - VERIFICATION OF COMPLIANCE (page 27)• AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.035 — Issuance of certificate - VERIFICATION OF COMPLIANCE (page 28) <p><u>2. Justification and proposed text / comment</u></p> <p>In AMC1-ADR.AR.C.035 (a);(b) — Issuance of certificate - VERIFICATION OF COMPLIANCE (page 27) :</p> <ul style="list-style-type: none">- paragraph (d) is guidance material, and not AMC (use of "may");- last sentence of paragraph (e) is not an obligation in ICAO, and is subject to a lot of debates. For instance, some States have strongly expressed their disagreement on this point in the ICAO Aerodromes Panel and in PANS Aerodromes Study Group, to which EASA participates. This point being an option and not an obligation, this sentence should be in GM. <p>Moreover, GM1-ADR.AR.C.035 does not seem to be related to AMC1-ADR.AR.C.035 (a);(b) : there is no clear hook It is consequently proposed to:</p> <ul style="list-style-type: none">• delete paragraph (d) and the last part of the sentence in paragraph (e) (ie "and ensure the publication of the certification status of the aerodrome in the aeronautical information publication") from AMC1-ADR.AR.C.035 (a);(b) and put them in GM,• delete GM1-ADR.AR.C.035.
response	<p>Not accepted</p> <p>On (d): Not agreed. The use of 'may' is not confined to GM. Neither is 'should' confined to AMCs. Their use is determined by what is intended to be expressed. In this case a possibility.</p> <p>On (e): Not agreed. Annex 15 requires the status of certification to be published in the AIP</p>

under AD 1.5, where it says:
 AD. 1.5 Status of certification of aerodromes
 A list of aerodromes in the State, indicating the status of certification, including:
 1.) Aerodrome name and ICAO location indicator
 2.) Date and if applicable, validity of certification; and
 3.) Remarks if any.
 This means that this is currently an ICAO obligation coming from Annex 15. Therefore, The Agency would like to retain this in the AMC as is. Furthermore, the promulgation of the certification status is an ICAO standard in Annex 14 under 2.13.1

Missing legal hook for GM: the legal hook for a GM is not an AMC, but the related IR. However, the references in GM1-ADR.AR.C.035(a);(b) are not very clear. It was cleared up.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment	<p>1702 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i></p> <p>5 (a) missing</p>
response	<p>Noted</p> <p>This is a misunderstanding. (5) is really (a) (5), therefore, after that, list is finished with (5) and the (b) follows.</p> <p>Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.</p>
comment	<p>1717 comment by: <i>Bavarian Ministry of Economic Affairs, Infrastructure, Transport and Technology</i></p> <p>The relationship between the nominated person and the authority is not fully clear. It is assumed that the nominated person would be a person on the authority's side.</p>
response	<p>Noted</p> <p>Mentioned nominee in this AMC under (a)(1) is a person who would be acting as focal point for the applicant.</p> <p>Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed..</p>
comment	<p>2056 comment by: <i>AENA - Aeropuertos Españoles y Navegación Aérea</i></p> <p>paragraph (d) is Guidance Material, and not AMC (use of "may"); It is consequently proposed to: delete paragrahp (d)</p>
response	<p>Not accepted</p>

On (d): Not agreed.
The use of 'may' is not confined to GM. Neither is 'should' confined to AMCs. Their use is determined by what is intended to be expressed. In this case a possibility.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment	2282	comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i>
	Where should the certification status be published in the AIP?	
response	Noted	
	Annex 15 requires the status of certification to be published in the AIP under AD 1.5, where it says: AD. 1.5 Status of certification of aerodromes A list of aerodromes in the State, indicating the status of certification, including: 1.) Aerodrome name and ICAO location indicator 2.) Date and if applicable, validity of certification; and 3.) Remarks if any. Furthermore, the promulgation of the certification status is an ICAO standard in Annex 14 under 2.13.1.	
	Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM1-ADR.AR.C.035 – Issuance of certificate	p. 28
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comment	122	comment by: <i>CAA-NL</i>
	It is not clear to what technical inspections paragraph (b) and (d)(i) refer to.	
response	Accepted	
	Given that the references in GM1-ADR.AR.C.035 were not clear they were taken out. The technical inspections refer to those mentioned under AMC1-ADR.AR.C.035(a);(b) – Issuance of certificate under (a)(2).	
	Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.	

comment	958	comment by: <i>NATS National Air Traffic Services Limited</i>
	2 comments	
	1. There is a "should" in this GM thus implying that they are AMC rather than GM. Suggest rewrite removing "should".	

	<p>2. There is no paragraph (d)(i) in AMC1-ADR.AR.C.035(a);(b).</p>
response	<p>Not accepted</p> <p>On 1: Not agreed. The use of 'may' is not confined to GM. Neither is 'should' confined to AMCs. Their use is determined by what is intended to be expressed. In this case a possibility.</p> <p>On 2: Comment not understood.</p> <p>Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.</p>
comment	<p>1164 comment by: <i>Federal Office of Civil Aviation FOCA</i></p> <p>GM1-ADR.AR.C.035: Please remove this provision. Justification: The order of priority listed cannot be applied everywhere and will depend on case by case basis. Tech. Inspections and certification process may very well run on a parallel basis.</p> <p>GM1-ADR.AR.C.035 (a)(3): FOCA suggests to delete the word "two" and add "such as" at the end of the sentence. There may be more cases where it may be necessary to interview or have a meeting with postholders.</p> <p>GM1-ADR.AR.C.035 (a)(3): Please add in the first sentence "...Interview with the Aerodrome Manager (or Operations Manager)...", ref. ADR.OR.D.015 (b)(1). The responsible person of the aerodrome is the Aerodrome Manager and has to be interviewed.</p>
response	<p><i>Partially accepted</i></p> <p>On GM1-ADR.AR.C.035: Not agreed. How can the aerodrome manual which contains the description of the technical detail of the aerodrome, be evaluated and found in satisfactory compliance with ADR.OR.E.005 before all necessary technical inspections (that is verification of those technical details) have taken place? We don't advise to do so. Therefore, the Agency wants to retain the GM as is.</p> <p>On GM1-ADR.AR.C.035 (a)(3): Agreed. The GM was changed to say: 'Possible cases where an interview/meeting with nominated post holders may be necessary are amongst others:'</p> <p>GM1-ADR.AR.C.035 (a)(3): Partially agreed. The Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons', and refer to ADR.OR.D.015. Please be aware that the AMC1-ADR.AR.C.035 mentions that the nominated persons 'may' be interviewed. It is up to the Competent Authority to decide to do so. It is, however, optional.</p> <p>Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.</p>

comment 1282 ❖ comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.035 (a);(b) — Issuance of certificate - VERIFICATION OF COMPLIANCE (page 27)
- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.035 — Issuance of certificate - VERIFICATION OF COMPLIANCE (page 28)

2. Justification and proposed text / comment

In AMC1-ADR.AR.C.035 (a);(b) — Issuance of certificate - VERIFICATION OF COMPLIANCE (page 27) :

- paragraph (d) is guidance material, and not AMC (use of "may");
- last sentence of paragraph (e) is not an obligation in ICAO, and is subject to a lot of debates. For instance, some States have strongly expressed their disagreement on this point in the ICAO Aerodromes Panel and in PANS Aerodromes Study Group, to which EASA participates. This point being an option and not an obligation, this sentence should be in GM.

Moreover, GM1-ADR.AR.C.035 does not seem to be related to AMC1-ADR.AR.C.035 (a);(b) : there is no clear hook

It is consequently proposed to:

- delete paragraph (d) and the last part of the sentence in paragraph (e) (ie "and ensure the publication of the certification status of the aerodrome in the aeronautical information publication") from AMC1-ADR.AR.C.035 (a);(b) and put them in GM,
- delete GM1-ADR.AR.C.035.

response Not accepted

Missing legal hook for GM: the legal hook for a GM is not an AMC, but the related IR.

In this case, the GM1-ADR.AR.C.035 is linked to the respective IR, and it talks about the order of inspections and evaluation of the aerodrome manual.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 2278 comment by: Airport St. Gallen-Altenrhein - ACH/LSZR

Delete the article. The order of priority given here may not always be possible.

response Not accepted

On GM1-ADR.AR.C.035: How can the aerodrome manual, which contains the description of the technical detail of the aerodrome, be evaluated and found in compliance with ADR.OR.E.005 before all necessary technical inspections (that is verification of those technical details) have taken place? We don't advise to do so. Therefore, the Agency wants to retain the GM as is.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.035(a)(3) – Issuance of certificate p. 28

comment 408 comment by: *Estonian CAA*

"We suggest to delete the word "two" and add "such as" at the end of the sentence in GM1-ADR.AR.C.035 (a)(3) on page 28.
There may be more cases where it may be necessary to interview or have a meeting with post holders."

response Accepted

Please note that the old AMC1-ADR.AR.C.035(a)(3) number was wrong.

On GM1-ADR.AR.C.035 (a)(3): Comment is in wrong AMC, but is agreed.
GM1-ADR.AR.C.035 (a)(3): was changed to say:
'Possible cases where an interview/ meeting with nominated post holders may be necessary are amongst others:'

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 685 comment by: *ADP : Aeroports de Paris*

Référence: AMC1 et GM1-ADR.ARC.035 (a) (3)	Issuance of certificate NOMINATED PERSONS
Proposition/commentaire	ADP souhaite supprimer ces dispositions.
Justification	L'autorité compétente n'a pas à rentrer dans la désignation des personnes nommées et listées dans l'ADR.OR.D.015. En effet ce sont des considérations internes à l'organisation pour lesquelles l'autorité compétente n'a pas à intervenir. Elle se contente de procéder à des vérifications et non pas des évaluations.
Traduction de courtoisie	ADP wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks

	but not assessments.
response	<p>Not accepted</p> <p>Please note that the old ACM1-ADR.AR.C.035 (a)(3) number was wrong.</p> <p>On old AMC1-ADR.AR.C.035 (a)(3): Not agreed. The involvement of the authority is twofold. It receives the application (content of which is regulated in ADR.OR.B.015, where under (b) (6) and (7) the accountable manager and the other postholders must be submitted). Meanwhile ADR.OR.D.015 requires having these postholders. Then, under ADR.AR.C.035 - Issuance of certificate (a)(2) the Authority is asked to have verified compliance in accordance with ADR.OR.B.025 which means verifying that these post holders are named and qualified. So by this interconnection, we have developed the AMC1-ADR.AR.C.035 (a)(3) which details how the Authority is involved in the acceptability of the persons who are nominated. So to conclude, the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and , if need be, interview them.</p> <p>Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.</p>
comment	<p>777 comment by: <i>Union des Aéroports français - UAF</i></p> <p>Attachment #37</p> <p>UAF NPA 2011-20 (B.II) AMC1 et GM1-ADR.AR.C.035 (a) (3)</p> <p>Référence: AMC1 et GM1-ADR.ARC.035 (a) (3) Issuance of certificate NOMINATED PERSONS</p> <p>Traduction de courtoisie The UAF wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.</p>
response	<p>Not accepted</p> <p>Please note that the old ACM1-ADR.AR.C.035 (a)(3) number was wrong.</p> <p>On old AMC1-ADR.AR.C.035 (a)(3): Not agreed. The involvement of the authority is twofold. It receives the application (content of which is regulated in ADR.OR.B.015, where under (b) (6) and (7) the accountable manager and the other postholders must be submitted). Meanwhile ADR.OR.D.015 requires having these postholders. Then under ADR.AR.C.035 - Issuance of certificate (a)(2) the Authority is asked to have verified compliance in accordance with ADR.OR.B.025, which means verifying that these post holders are named and qualified. So by this interconnection, we have developed the AMC1-ADR.AR.C.035 (a)(3) which details how the Authority is involved in the acceptability of the persons who are nominated. So to conclude, the authority is not</p>

involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and , if need be, interview them.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 960 comment by: *NATS National Air Traffic Services Limited*

There is no ADR.AR.C.035(a)(3) in the IR.

Superfluous word: "...the nominated person listed mentioned in"
Suggest delete "mentioned"

Would it be better to refer to ADR.OR.B.015(b)(7) which actually mentions nominated persons and it refers to ADR.OR.D.015?

response Not accepted

The assessment of the acceptability of nominated persons is foreseen also under Doc. 9774 of ICAO under 3.D.2 Competence of operational and maintenance personal. The USOAP protocol questions also feature a question on this:

'AGA 8.087 Does the aerodrome regulatory authority ensure that aerodrome operators employ competent personnel to perform all critical activities for aerodrome operations and maintenance?'

So the Agency believes this ought to be at least AMC.

comment 1131 comment by: *Danish Transport Authority*

Parts of the paragraph should be moved to guidance material. Proposal: "When an aerodrome operator submits the name of a nominee for the nominated persons listed in ADR.OR.D.015, the competent authority should assess his/her qualifications in regard to intended work area before deciding upon his/her acceptability."

response Noted

The AMC was changed such as to say Accountable Manager and other nominated persons mentioned under ADR.OR.D.015.

comment 1132 comment by: *Danish Transport Authority*

EDITORIAL: Harmonize the names on nominated postholders (NPH). At least the 4 NPH stated under AMC1-ADR.OR.D.015 (a)-(d) should be used: Accountable Manager, Compliance Monitoring Manager (quality and compliance), Safety Manager and Aerodrome Manager (operational services and maintenance).

response *Accepted*

The AMC was changed such as to say Accountable Manager and other nominated persons mentioned under ADR.OR.D.015.

comment	<p>1284 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• AMC/GM to ANNEX I — Part-AR - AMC1.ADR.AR.C.035(a)(3) — Issuance of certificate – NOMINATED PERSONS (page 28) <p><u>2. Justification and proposed text / comment</u></p> <p>This comment is critical. Interviewing the nominated persons is indeed performed for issuing a certificate, but to know and assess the chosen organization and management system, NOT TO assess their skills and suitability to their positions: this would interfere with the role of the aerodrome operator, and with the proper functioning of the SMS.</p> <p>It is proposed to delete this AMC.</p>
response	<p>Not accepted</p> <p>The assessment of the acceptability of nominated persons is foreseen also under Doc. 9774 of ICAO under 3.D.2 Competence of operational and maintenance personal. The USOAP protocol questions also feature a question on this: 'AGA 8.087 Does the aerodrome regulatory authority ensure that aerodrome operators employ competent personnel to perform all critical activities for aerodrome operations and maintenance?'</p> <p>So the Agency believes this ought to be at least AMC.</p> <p>Please note that the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and , if need be, interview them.</p>
comment	<p>1292 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #38</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1 et GM1-ADR.AR.C.035 (a) (3)</p> <p>Référence: AMC1 et GM1-ADR.ARC.035 (a) (3) Issuance of certificate NOMINATED PERSONS</p> <p>Traduction de courtoisie The UAF wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.</p>
response	<p>Not accepted</p> <p>Please note that the old ACM1-ADR.AR.C.035 (a)(3) number was wrong.</p>

On old AMC1-ADR.AR.C.035 (a)(3): Not agreed.
The involvement of the authority is two-fold. It receives the application (content of which is regulated in ADR.OR.**B**.015, where under (b) (6) and (7) the accountable manager and the other postholders must be submitted). Meanwhile ADR.OR.**D**.015 requires having these postholders. Then, under ADR.AR.C.035 - Issuance of certificate (a)(2) the Authority is asked to have verified compliance in accordance with ADR.OR.B.025 which means verifying that these post holders are named and qualified. So by this interconnection, we have developed the AMC1-ADR.AR.C.035 (a)(3) which details how the Authority is involved in the acceptability of the persons who are nominated. So to conclude, the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and, if need be, interview them.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 1668 comment by: *Aéroport de Marseille - MRS/LFML*

AMP wants to delete these dispositions.
The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.

response Not accepted

Please note that the old ACM1-ADR.AR.C.035 (a)(3) number was wrong.

On old AMC1-ADR.AR.C.035 (a)(3): Not agreed. The involvement of the authority is two-fold. It receives the application (content of which is regulated in ADR.OR.**B**.015, where under (b) (6) and (7) the accountable manager and the other postholders must be submitted). Meanwhile ADR.OR.**D**.015 requires having these postholders. Then, under ADR.AR.C.035 - Issuance of certificate (a)(2) the Authority is asked to have verified compliance in accordance with ADR.OR.B.025 which means verifying that these post holders are named and qualified. So by this interconnection, we have developed the AMC1-ADR.AR.C.035 (a)(3) which details how the Authority is involved in the acceptability of the persons who are nominated. So to conclude, the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and, if need be, interview them.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

comment 1817 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#39](#)

ADBM - NPA 2011-20 (B.II) AMC1 et GM1-ADR.AR.C.035 (a)(3)

Référence: AMC1 et GM1-ADR.ARC.035 (a) (3)

	<p>Issuance of certificate NOMINATED PERSONS</p> <p>Traduction de courtoisie The ADBM wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.</p>
<p>response</p>	<p>Not accepted</p> <p>Please note that the old ACM1-ADR.AR.C.035 (a)(3) number was wrong.</p> <p>On old AMC1-ADR.AR.C.035 (a)(3): Not agreed. The involvement of the authority is two-fold. It receives the application (content of which is regulated in ADR.OR.B.015, where under (b) (6) and (7) the accountable manager and the other postholders must be submitted). Meanwhile ADR.OR.D.015 requires having these postholders. Then, under ADR.AR.C.035 - Issuance of certificate (a)(2) the Authority is asked to have verified compliance in accordance with ADR.OR.B.025 which means verifying that these post holders are named and qualified. So by this interconnection, we have developed the AMC1-ADR.AR.C.035 (a)(3) which details how the Authority is involved in the acceptability of the persons who are nominated. So to conclude, the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and, if need be, interview them.</p> <p>Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.</p>
<p>comment</p>	<p>2057 comment by: AENA - Aeropuertos Españoles y Navegación Aérea</p> <p>This comment is critical. Interviewing the nominated persons is indeed performed for issuing a certificate, but to know and assess the chosen organization and management system, NOT TO assess their skills and suitability to their positions: this would interfere with the role of the aerodrome operator, and with the proper functioning of the SMS.</p> <p>It is proposed to delete this AMC.</p>
<p>response</p>	<p><i>Not accepted</i></p> <p>The assessment of the acceptability of nominated persons is foreseen also under Doc. 9774 of ICAO under 3.D.2 Competence of operational and maintenance personal. The USOAP protocol questions also feature a question on this: 'AGA 8.087 Does the aerodrome regulatory authority ensure that aerodrome operators employ competent personnel to perform all critical activities for aerodrome operations and maintenance?'</p> <p>So the Agency believes this ought to be at least AMC.</p> <p>Please note that the authority is not involved in the designation of</p>

nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and, if need be, interview them.

comment

2289

comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

<u>Référence: AMC1 et GM1-ADR.ARC.035 (a) (3)</u>	Issuance of certificate NOMINATED PERSONS
Proposition/commentaire	ACA souhaite supprimer ces dispositions.
Justification	L'autorité compétente n'a pas à rentrer dans la désignation des personnes nommées et listées dans l'ADR.OR.D.015. En effet ce sont des considérations internes à l'organisation pour lesquelles l'autorité compétente n'a pas à intervenir. Elle se contente de procéder à des vérifications et non pas des évaluations.
Traduction de courtoisie	ACA wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.

response

Not accepted

Please note that the old ACM1-ADR.AR.C.035 (a)(3) number was wrong.

On old AMC1-ADR.AR.C.035 (a)(3): Not agreed. The involvement of the authority is two-fold. It receives the application (content of which is regulated in ADR.OR.**B**.015, where under (b) (6) and (7) the accountable manager and the other postholders must be submitted). Meanwhile ADR.OR.**D**.015 requires having these postholders. Then, under ADR.AR.C.035 - Issuance of certificate (a)(2) the Authority is asked to have verified compliance in accordance with ADR.OR.**B**.025 which means verifying that these post holders are named and qualified. So by this interconnection, we have developed the AMC1-ADR.AR.C.035 (a)(3) which details how the Authority is involved in the acceptability of the persons who are nominated. So to conclude, the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and, if need be, interview them.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/ GM references have changed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM1-ADR.AR.C.035(a)(3) – Issuance of certificate p. 28-29

comment 88 comment by: CAA Norway
We suggest to delete the word "two" and add "**such as**" at the end of the sentence in GM1-ADR.AR.C.035 (a)(3) on page 28. There may be more cases where it may be necessary to interview or have a meeting with post holders.

response *Accepted*
On GM1-ADR.AR.C.035 (a)(3): Agreed.
The GM was changed to say: 'Possible cases where an interview/meeting with nominated post holders may be necessary are amongst others:'

comment 89 comment by: CAA Norway
Add to the first sentence GM1-ADR.AR.C.035 (a)(3) on page 28: "...Interview with the **Aerodrome Manager** (or *Operations Manager if that is what EASA will call this person/function*)...", ref. ADR.OR.D.015 (b)(1).

response Partially accepted
The Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons', and refer to ADR.OR.D.015. Please be aware that the AMC1-ADR.AR.C.035 mentions that the nominated persons 'may' be interviewed. It is up to the Competent Authority to decide to do so. It is, however, optional.

comment 90 comment by: CAA Norway
We suggest to clear up the use of titles in GM1-ADR.AR.C.035 (a)(3) on page 29:
"- the role and responsibility of the Accountable Manager/Chief Operating Officer/Safety Coordinator or other nominated post holders;"

response Partially accepted
On clearing up wrong number of GM: Agreed.
Please note that the old GM1-ADR.AR.C.035 (a)(3) number was wrong.
On suggestion of new title: Not agreed.
However, the Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons', and refer to ADR.OR.D.015.

comment 411 comment by: Estonian CAA

	<p>Add to the first sentence GM1-ADR.AR.C.035 (a)(3) on page 28: "...Interview with the Aerodrome Manager (or Operations Manager)...", ref. ADR.OR.D.015 (b)(1).</p>
response	<p>Partially accepted</p> <p>The Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons', and refer to ADR.OR.D.015. Please be aware that the AMC1-ADR.AR.C.035 mentions that the nominated persons 'may' be interviewed. It is up to the Competent Authority to decide to do so. It is, however, optional.</p>
comment	<p>412 comment by: <i>Estonian CAA</i></p> <p>"We suggest to clear up the use of titles in GM1-ADR.AR.C.035 (a)(3) on page 29: ""- the role and responsibility of the Accountable Manager/Chief Operating Officer/Safety Coordinator or other nominated post holders;""</p>
response	<p>Partially accepted</p> <p>On clearing up wrong number of GM: Agreed. Please note that the old GM1-ADR.AR.C.035 (a)(3) number was wrong.</p> <p>On suggestion of new title: Not agreed. However, the Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons', and refer to ADR.OR.D.015.</p>
comment	<p>434 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>We suggest to delete the word "two" and add "such as" at the end of the sentence in GM1-ADR.AR.C.035 (a)(3) on page 28. There may be more cases where it may be necessary to interview or have a meeting with post holders. Centance will then be: There are possible cases wehre an interview/meeting with nominated postholders may be necessary, such as;</p>
response	<p><i>Accepted</i></p> <p>On GM1-ADR.AR.C.035 (a)(3): Agreed. The GM was changed to say: 'Possible cases where an interview/meeting with nominated post holders may be necessary are amongst others:'</p>
comment	<p>439 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>Add to the first sentence GM1-ADR.AR.C.035 (a)(3) on page 28: "...Interview with the Aerodrome Manager (or Operations Manager if that is what EASA will call this person/function)...", ref. ADR.OR.D.015 (b)(1).</p>
response	<p>Accepted</p> <p>On GM1-ADR.AR.C.035 (a)(3): Agreed. The GM was changed to say:</p>

'Possible cases where an interview/ meeting with nominated post holders may be necessary are amongst others:'

comment 446 comment by: *Icelandic Civil Aviation Administration*
We suggest to clear up the use of titles in GM1-ADR.AR.C.035 (a)(3) on page 29: "- the role and responsibility of the Accountable Manager/Chief Operating Officer/Safety Coordinator or other nominated post holders;" - change this to - "- the role and responsibility of the Accountable Manager/ Operations Manager / Safety Manager or other nominated post holders;"

response Partially accepted
On clearing up wrong number of GM: Agreed.
Please note that the old GM1-ADR.AR.C.035 (a)(3) number was wrong.
On suggestion of new title: Not agreed.
However, the Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons', and refer to ADR.OR.D.015.

comment 650 comment by: *Finnish Transport Safety Agency*
We suggest to delete the word "two" and add "such as" at the end of the sentence in GM1-ADR.AR.C.035 (a)(3) on page 28. There may be more cases where it may be necessary to interview or have a meeting with post holders. "There are possible cases where an interview/meeting with nominated postholders may be necessary, such as;"

response *Accepted*
On GM1-ADR.AR.C.035 (a)(3):Agreed.
The GM was changed to say:'Possible cases where an interview/ meeting with nominated post holders may be necessary are amongst others:'

comment 651 comment by: *Finnish Transport Safety Agency*
Add to the first sentence GM1-ADR.AR.C.035 (a)(3) on page 28: "...Interview with the Aerodrome Manager (or Operations Manager)...", ref. ADR.OR.D.015 (b)(1).

response Partially accepted
The Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons', and refer to ADR.OR.D.015. Please be aware that the AMC1-ADR.AR.C.035 mentions that the nominated persons 'may' be interviewed. It is up to the Competent Authority to decide to do so. It is, however, optional.

comment	<p>652 comment by: <i>Finnish Transport Safety Agency</i></p> <p>We suggest to clear up the use of titles in GM1-ADR.AR.C.035 (a)(3) on page 29: "- the role and responsibility of the Accountable Manager/Chief Operating Officer/Safety Coordinator or other nominated post holders;"</p>
response	<p>Partially accepted</p> <p>On clearing up wrong number of GM: Agreed. Please note that the old GM1-ADR.AR.C.035 (a)(3) number was wrong.</p> <p>On suggestion of new title: Not agreed. However, the Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons', and refer to ADR.OR.D.015.</p>

comment	<p>685 ❖ comment by: <i>ADP : Aeroports de Paris</i></p> <table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Référence: AMC1 et GM1-ADR.ARC.035 (a) (3)</td> <td>Issuance of certificate NOMINATED PERSONS</td> </tr> <tr> <td>Proposition/commentaire</td> <td>ADP souhaite supprimer ces dispositions.</td> </tr> <tr> <td>Justification</td> <td>L'autorité compétente n'a pas à rentrer dans la désignation des personnes nommées et listées dans l'ADR.OR.D.015. En effet ce sont des considérations internes à l'organisation pour lesquelles l'autorité compétente n'a pas à intervenir. Elle se contente de procéder à des vérifications et non pas des évaluations.</td> </tr> <tr> <td>Traduction de courtoisie</td> <td>ADP wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.</td> </tr> </table>	Référence: AMC1 et GM1-ADR.ARC.035 (a) (3)	Issuance of certificate NOMINATED PERSONS	Proposition/commentaire	ADP souhaite supprimer ces dispositions.	Justification	L'autorité compétente n'a pas à rentrer dans la désignation des personnes nommées et listées dans l'ADR.OR.D.015. En effet ce sont des considérations internes à l'organisation pour lesquelles l'autorité compétente n'a pas à intervenir. Elle se contente de procéder à des vérifications et non pas des évaluations.	Traduction de courtoisie	ADP wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.
Référence: AMC1 et GM1-ADR.ARC.035 (a) (3)	Issuance of certificate NOMINATED PERSONS								
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Traduction de courtoisie	ADP wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.								
response	<p>Not accepted</p> <p>Please note that the old ACM1-ADR.AR.C.035 (a)(3) number was wrong.</p> <p>On old AMC1-ADR.AR.C.035 (a)(3): Not agreed. The involvement of the authority is two-fold. It receives the application (content of which is regulated in ADR.OR.B.015, where under (b) (6) and (7) the accountable manager and the other postholders must be submitted). Meanwhile ADR.OR.D.015 requires having these postholders. Then, under ADR.AR.C.035 - Issuance of certificate (a)(2) the Authority is</p>								

asked to have verified compliance in accordance with ADR.OR.B.025 which means verifying that these post holders are named and qualified. So by this interconnection, we have developed the AMC1-ADR.AR.C.035 (a)(3) which details how the Authority is involved in the acceptability of the persons who are nominated. So to conclude, the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and, if need be, interview them.

Generally: The Agency may change the order of the points in the relevant IR, so please be mindful if the AMC/GM references have changed.

comment

855 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.A.015 (d) — Means of compliance (p16-17)
- ANNEX I - Part-AR - ADR.AR.B.005 (d) — Management system (p20)
- ANNEX I - Part-AR - ADR.AR.C.040(f) - Changes (26-27)
- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.B.005(d) — Management system (p13-14)
- AMC/GM to ANNEX I — Part-AR — AMC1 -ADR.AR.C.040(f) — Changes (p31-32)
- AMC/GM to ANNEX I — Part-AR — AMC3 -ADR.AR.C.040(a);(f) — Changes (p32-33)
- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.035(a)(3) - Changes (p28)
- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.040(c) - Changes (p33)
- ANNEX II - Part-OR – ADR-OR.B.040(a) – Changes (p41-42)
- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.B.040(a) — Changes (p60-61)

This comment is linked with comment number 1101 in book I.

2. General comment

These paragraphs lead to many formal exchanges that are not always relevant and that considerably increase the administrative burden of:

- both the EASA and the competent authority for ADR.AR.A.015 (d), ADR.AR.B.005 (d) and the corresponding acceptable means of compliance and
- both the aerodrome operator and the competent authority for ADR.AR.C.040(f) and the corresponding acceptable means of compliance.

3. Justification and proposed text / comment

- Paragraph (d) of ADR.AR.A.015

Minor alternative AMC to the ones proposed by EASA may be accepted, due to local special constraints. In order to avoid administrative burden both for the EASA and the competent authority, it is proposed to only

notify the "significant" alternative AMC, i.e. the ones which differs notably from the EASA's ones and the ones that will be applied on a national scale. Paragraph (d) of ADR.AR.A.015 requires notification of these alternatives AMC to all other Member States which amplifies considerably the aforementioned administrative burden, in particular for AMC that may not be usable or relevant for other aerodromes.

Paragraph (d) of ADR.AR.A.015 also implies that alternative AMC that could be possibly rejected by EASA will be notified to other Member States, without them knowing of the acceptability the alternative AMC. It is proposed to delete this requirement and let EASA informs all the Member States (for example, through a website) of the AMC that are deemed acceptable.

In order to limit the administrative burden to the most pertinent, DGAC proposes the following modifications of ADR.AR.A.015:

ADR.AR.A.015 – Means of compliance

" [...]

(d) [...] When the competent authority finds that the alternative means of compliance proposed by the aerodrome operator or the provider of apron management services are in accordance with the Implementing Rules, it shall without undue delay:

(1) notify the applicant that the alternative means of compliance may be implemented and, if applicable, amend the approval or certificate of the applicant accordingly;

(2) notify the Agency of their content of the significant ones, including copies of the relevant documentation;

~~*(3) inform other Member States about alternative means of compliance that were accepted.*~~

(e) [...] The competent authority shall provide the Agency with a full description of the significant alternative means of compliance, including any revisions to procedures that may be relevant, as well as an assessment demonstrating that the Implementing Rules are met. "

- Paragraph (d) of ADR.AR.B.005 and AMC1-ADR.AR.B.005 (d)

The adaptation of the procedures of the competent authority is a living and ongoing processes. In order to avoid administrative burden both for the competent authority and the EASA, DGAC proposes to only notify the most significant amendments of the procedures.

ADR.AR.B.005 – Management system

" [...]

(d) A copy of the procedures related to the management system and their significant amendments shall be made available to the Agency for the purpose of standardisation."

AMC1-ADR.AR.B.005 (d) – Management system

"PROCEDURES AVAILABLE TO THE AGENCY

(a) Copies of the procedures in the competent authority's management system should be made available to the Agency for the purpose of standardisation. These should include any significant amendments to the procedures. The procedures should provide at least the following information:

[...]"

- Paragraph (f) of ADR.AR.C.040 and AMC1-ADR.AR.C.040(f)

The tasks allocated to the competent authority for "changes not requiring

prior approval" are as high as for those requiring prior approval which is not pertinent.

Considering the numerous changes notified to the competent authority, this would lead to high workload incompatible with available resources.

Furthermore, since every change would be thoroughly examined by the competent authority and providing no comment would be considered as implied approval, this would remove responsibility for the change from the aerodrome operator to the competent authority.

This is a **critical** point for DGAC that proposes the following changes to deal with it:

ADR.AR.C.040 – Changes

"[...] (f) For changes not requiring prior approval, the competent authority shall assess the information provided in the notification sent by the aerodrome operator in accordance with ADR.OR.B.040 to verify compliance with the Certification Specifications **basis** issued by the Agency and the applicable requirements, as appropriate. In case of any non-compliance, the competent authority shall:

(1) notify the aerodrome operator about the non-compliance and request further changes; and

(2) in case of level 1 or level 2 findings, act in accordance with Article ADR.AR.C.055.

"[...]"

AMC1 -ADR.AR.C.040(f) – Changes – page 31

"CHANGES NOT REQUIRING PRIOR APPROVAL

(a) Upon receiving a notification of a change that does not require a prior approval, the competent authority should:

(1) assess the change ~~in relation to~~ **is compliant with** the certification basis and the applicable requirements of Part ADR.OR, Part ADR.OPS, as well as any other applicable requirements;

(2) ~~assess if the aerodrome operator has identified all the certification specifications, applicable requirements of Part ADR.OR, Part ADR.OPS, or other applicable requirements which are related to or affected by the change, as well as any cases related to demonstration of an equivalent level of safety;~~

(3) ~~assess the actions proposed by the aerodrome operator in order to show compliance with (1) and (2) above;~~

(4) ~~review and assess the content of the changes to the aerodrome manual; and;~~

(5) ~~evaluate~~ **check that the safety assessment that has been submitted by the aerodrome operator, in accordance with AMC1 ADR.AR.C.035(b) and verify its compliance with ADR.OR.B.065 coordinated with third parties, and that it properly identifies risks and mitigation means.**

"[...]"

- AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33) and GM1-ADR.AR.C.035(a)(3) – Changes (p28)

In paragraph (a), the changes in nominated persons should not be transmitted to the competent authority as they are not significant safety related matter. The competency of nominated persons should be assessed by the aerodrome operator within its SMS, and the authority will oversee the SMS functioning is adequate, but not assess directly the competency

of aerodrome operator staff. The word "qualification" should be avoided (see comment n°869 on qualifications). It is consequently proposed to delete this paragraph.

In paragraph (c): only significant amendments of the management system documentation should be notified to the competent authority.

It is consequently proposed to modify AMC3 -ADR.AR.C.040(a);(f) – Changes as follows :

AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33)

GENERAL

~~(a) Changes in nominated persons: The competent authority should be informed of any changes to personnel specified in Part ADR.OR that may affect the certificate or the terms of approval attached to it. When an aerodrome operator submits the name of a nominee for the nominated persons mentioned in ADR.OR.D.015, the competent authority should assess his/her qualifications and may interview the nominee or call for additional evidence of his/her suitability before deciding upon his/her acceptability (see GM1-ADR.AR.C.035 (a)(3)).~~

~~(b) A documented systematic approach should be used for maintaining the information on when an amendment was received by the competent authority and when it was approved.~~

~~(c) The competent authority should receive from the aerodrome operator each **significant** management system documentation amendment, including amendments that do not require prior approval by the competent authority. Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should indicate its approval in writing. Where the amendment does not require prior approval, the competent authority should acknowledge receipt in writing within the time limits existing under the relevant national legislation.~~

~~[...]"~~

and delete GM1-ADR.AR.C.035(a)(3) – Changes

GM1-ADR.AR.C.040(c)

It is agreed that any changes to the terms of approval of the certificate should be prior approved by the competent authority. However, this does not systematically lead to the formal change of the certificate itself : for a temporary change the formal process of modifying the certificate might take longer than the changes itself.

It is proposed to modify GM1-ADR.AR.C.040(c) : change "~~irrespective of their magnitude~~" by "**where appropriate**"

- Paragraph (a) of ADR.OR.B.040 and AMC1-ADR.OR.B.040(a)

Paragraph (a)(3) of ADR.OR.B.040 is not clear on which entity (the competent authority or the aerodrome operator) decides whether a change needs to be approved by the competent authority or not. DGAC proposes modify it to indicate more explicitly that these changes are those that the competent authority finds necessary to be approved:

ADR.OR.B.040 – Changes

"(a) Any **significant** change affecting:

(1) the terms of approval of the certificate; or

(2) any of the elements of the operator's management system as required in ADR.OR.D.005 (b)(1), (b)(3), (b)(4), (b)(6) and (b)(7); or
(3) any additional elements notified to the competent authority in accordance with paragraph (c) but ~~found necessary to be approved by the competent authority~~ found necessary by the competent authority to be approved,
shall require prior approval by the competent authority.
[...]"

Paragraph (b) of AMC1-ADR.OR.B.040(a) gives too much details while flexibility is needed and the changes requiring prior approval by the competent authority are already defined in accordance with paragraph (a) and (c) of ADR.OR.B.040. It is essential to delete this paragraph to prevent from useless increased administrative burden between the aerodrome operator and the competent authority.

AMC1-ADR.OR.B.040(a) – Changes

"CHANGES REQUIRING PRIOR APPROVAL

[...]

(b) Examples of such changes include, but are not limited to, the following:

(1) changes to the physical characteristics of a runway; such as:

(i) new runway(s): a development resulting in the construction of a 'new' runway (e.g. new construction, or the change of an existing grass surface to a paved surface);

(ii) runway extension or shortening resulting in an amendment to declared distances;

(iii) threshold relocation (Instrument Status): a development involving relocation of the instrument runway threshold, or relocation of a non-instrument runway threshold in preparation for instrument status;

(iv) changes to runway designation.

(2) changes of the aerodrome visual aids or other changes to the aerodrome, when such changes are associated with a change (upgrade or downgrade) of the intended operations (e.g. to accommodate low visibility operations and/or night operations);

(3) changes in the aerodrome operating minima;

(4) change that affects the obstacle limitation surfaces associated with approved type of approaches;

(5) change in the level of the rescue and fire-fighting services;

(6) changes in the organisational structure of the organisation, including responsibilities, and accountabilities;

(7) changes related to fuel provision."

response

Not accepted

On Suggestion to delete GM1-ADR.AR.C.035(a)(3) – Issuance of certificate : Please note that the old GM1-ADR.AR.C.035 (a)(3) number was wrong. There is no (a)(3), only (a)(2). So the GM will be renamed.

Not agreed.

The assessment of the acceptability of nominated persons is foreseen also under Doc. 9774 of ICAO under 3.D.2 Competence of operational and maintenance personal. The USOAP protocol questions also feature a question on this:

'AGA 8.087 Does the aerodrome regulatory authority ensure that

aerodrome operators employ competent personnel to perform all critical activities for aerodrome operations and maintenance?’
So the Agency believes this GM is useful to help authorities to conduct the interviews with nominated personnel, if they should indeed chose to do so. Please note that the interview is a clear ‘may’ in the relevant AMC1_ADR.AR.C.035 (a)(3).

However, the Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to ‘accountable manager and other nominated persons’, and refer to ADR.OR.D.015. Change of nominated persons will have to be accepted by the authority.

comment 961 comment by: *NATS National Air Traffic Services Limited*
There is no ADR.AR.C.035(a)(3) in the IR.
Possible unfinished sentence “...other nominated persons...”?

response Accepted
Punctuation was missing. In the GM here, the Agency will make a change to refer to ‘accountable manager and other nominated persons’, and refer to ADR.OR.D.015.

comment 1419 comment by: *Swedish Transport Agency*
We suggest to delete the word “two” and add “such as” at the end of the sentence in GM1-ADR.AR.C.035 (a)(3) on page 28. There may be more cases where it may be necessary to interview or have a meeting with post holders.

response *Accepted*
On GM1-ADR.AR.C.035 (a)(3): Agreed.
The GM was changed to say: ‘Possible cases where an interview/ meeting with nominated post holders may be necessary are amongst others:’

comment 1420 comment by: *Swedish Transport Agency*
Add to the first sentence GM1-ADR.AR.C.035 (a)(3) on page 28: “...Interview with the Aerodrome Manager (or Operations Manager)...”, ref. ADR.OR.D.015 (b)(1).

response Partially accepted
The Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to ‘accountable manager and other nominated persons’, and refer to ADR.OR.D.015. Please be aware that the AMC1-ADR.AR.C.035 mentions that the nominated persons ‘may’ be interviewed. It is up to the Competent Authority to decide to do so. It is, however, optional.

comment 1421 comment by: *Swedish Transport Agency*

	<p>We suggest to clear up the use of titles in GM1-ADR.AR.C.035 (a)(3) on page 29: "- the role and responsibility of the Accountable Manager/Chief Operating Officer/Safety Coordinator or other nominated post holders;"</p>
response	<p>Partially accepted</p> <p>On clearing up wrong number of GM: Agreed. Please note that the old GM1-ADR.AR.C.035 (a)(3) number was wrong. There is no (a)(3), only (a)(2).</p> <p>On suggestion of new title: Not agreed. However, the Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons' and refer to ADR.OR.D.015.</p>
comment	<p>1669 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>AMP wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.</p>
response	<p>Not accepted</p> <p>The assessment of the acceptability of nominated persons is foreseen also under Doc. 9774 of ICAO under 3.D.2 Competence of operational and maintenance personal. The USOAP protocol questions also feature a question on this: 'AGA 8.087 Does the aerodrome regulatory authority ensure that aerodrome operators employ competent personnel to perform all critical activities for aerodrome operations and maintenance?'</p> <p>So the Agency believes this GM is useful to help authorities to conduct the interviews with nominated personnel if they should indeed chose to do so. Please note that the interview is a clear may in the relevant AMC1_ADR.AR.C.035 (a)(3).</p> <p>Please note that the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and, if need be, interview them.</p>
comment	<p>1961 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.</p>
response	<p>Not accepted</p> <p>The assessment of the acceptability of nominated persons is foreseen also under Doc. 9774 of ICAO under 3.D.2 Competence of operational and maintenance personal. The USOAP protocol questions also feature a</p>

question on this:
'AGA 8.087 Does the aerodrome regulatory authority ensure that aerodrome operators employ competent personnel to perform all critical activities for aerodrome operations and maintenance?'

So the Agency believes this GM is useful to help authorities to conduct the interviews with nominated personnel if they should indeed chose to do so. Please note that the interview is a clear 'may' in the relevant AMC1-ADR.AR.C.035 (a)(3).

Please note that the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and, if need be, interview them.

comment 2275 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
Add Aerodrome Manager (or Operations Manager)..

response Partially accepted
The Agency advises to look at the reworded version of ADR.OR.D.015 on Personnel requirements for the nominated persons. In the GM here, the Agency will make a change to refer to 'accountable manager and other nominated persons', and refer to ADR.OR.D.015. Please be aware that the AMC1-ADR.AR.C.035 mentions that the nominated persons 'may' be interviewed. It is up to the competent authority to decide to do so. It is, however, optional.

comment 2277 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
We suggest deleting the word "two" and add "such as" at the end of the sentence.

response Accepted
On GM1-ADR.AR.C.035 (a)(3):Agreed.
The GM was changed to say:'Possible cases where an interview/ meeting with nominated post holders may be necessary are amongst others:'

comment 2290 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

<u>Référence: AMC1 et GM1-ADR.ARC.035 (a) (3)</u>	Issuance of certificate NOMINATED PERSONS
Proposition/commentaire	ACA souhaite supprimer ces dispositions.
Justification	L'autorité compétente n'a pas à rentrer dans la désignation des personnes nommées et listées dans l'ADR.OR.D.015. En effet ce sont des considérations internes à l'organisation pour lesquelles l'autorité compétente n'a pas à intervenir. Elle se contente de procéder à des

	vérifications et non pas des évaluations.
Traduction de courtoisie	ACA wants to delete these dispositions. The competent authority does not have to appear in the designation of the nominated persons listed mentioned in ADR.OR.D.015. Indeed they are considerations internal to the organisation that the competent authority does not have to step in. It just carries out checks but not assessments.

response

Not accepted

The assessment of the acceptability of nominated persons is foreseen also under Doc. 9774 of ICAO under 3.D.2 Competence of operational and maintenance personal. The USOAP protocol questions also feature a question on this:

'AGA 8.087 Does the aerodrome regulatory authority ensure that aerodrome operators employ competent personnel to perform all critical activities for aerodrome operations and maintenance?'

So the Agency believes this GM is useful to help authorities to conduct the interviews with nominated personnel if they should indeed chose to do so. Please note that the interview is a clear 'may' in the relevant AMC1-ADR.AR.C.035 (a)(3).

Please note that the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and, if need be, interview them.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.035(d)(1);(2) – Issuance of certificate

p. 29

comment

672

comment by: ADP : Aeroports de Paris

Référence: AMC1-ADR.AR.C.035(d) (1) ; (2)	Issuance of certificate ISSUANCE OF SEPARATE CERTIFICATES
Proposition/commentaire	(c) Il convient de supprimer le (c) de cette AMC.
Justification	Il s'agit du certificat d'un aérodrome et non du certificat pour plusieurs aérodromes. Il n'y a donc pas à faire la liste de l'ensemble des aérodromes gérés par l'exploitant d'aérodrome.

<p>Traduction de courtoisie</p>	<p>(c) It is appropriate to delete the (c) from this AMC. It is about the certificate for one aerodrome and not for several aerodromes. There is non point in listing all the aerodromes operated by the aerodrome operator.</p>
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response Not accepted

The multiple aerodrome operator certificate is an option as per Art. 8a 2(d), and the Agency was mandated to develop all options of operator certificates: 1. Single, 2. Dual, and 3. Multiple. This will actually be used by Scandinavian national airport operator companies. What France chooses to use is its decision. It would not be appropriate to take this legally obligatory choice away from the other Member States.

comment 779 comment by: *Union des Aéroports français - UAF*

Attachment [#43](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.AR.C.035(d) (1);(2)

Référence: AMC1-ADR.AR.C.035(d) (1) ; (2)
 Issuance of certificate ISSUANCE OF SEPARATE CERTIFICATES

Traduction de courtoisie
 (c) It is appropriate to delete the (c) from this AMC.
 It is about the certificate for one aerodrome and not for several aerodromes. There is non point in listing all the aerodromes operated by the aerodrome operator.

response Not accepted

The multiple aerodrome operator certificate is an option as per Art. 8a 2(d), and the Agency was mandated to develop all options of operator certificates: 1. Single, 2. Dual, and 3. Multiple. This will actually be used by Scandinavian national airport operator companies. What France chooses to use is its decision. It would not be appropriate to take this legally obligatory choice away from the other Member States.

comment 963 comment by: *NATS National Air Traffic Services Limited*

Missing word in both (a) and (b): "In the case there is a possibility to issue..." Suggest amend to "In the case that there is a possibility to issue..."

response Accepted

The text was changed.

comment 965 comment by: *NATS National Air Traffic Services Limited*

AMC1-ADR.AR.C.035(d)(1);(2)(c): If an aerodrome operator operates

	<p>several aerodromes some of which could in other member states or further afield how is the certification issuance affected?</p>
response	<p>Noted</p> <p>There is no mutual recognition of aerodrome operator certificates across Europe. Recital (8) of Regulation (EC) No 1108/2009 states clearly that: 'Member States may certify aerodrome infrastructure and operations separately. In that case certificates should be delivered by the same authority.' Therefore, the case described in the comment will not exist. The operator would always have to obtain a certificate from the competent authority of the Member State where the aerodrome is located.</p>
comment	<p>1300 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #44</p> <p>Aéroport Bâle - Mulhouse NPA 2011-20 (B.II) AMC1-ADR.AR.C.035(d) (1);(2)</p> <p>Référence: AMC1-ADR.AR.C.035(d) (1) ; (2) Issuance of certificate ISSUANCE OF SEPARATE CERTIFICATES</p> <p>Traduction de courtoisie (c) It is appropriate to delete the (c) from this AMC. It is about the certificate for one aerodrome and not for several aerodromes. There is non point in listing all the aerodromes operated by the aerodrome operator.</p>
response	<p>Not accepted</p> <p>The multiple aerodrome operator certificate is an option as per Art. 8a 2(d) and the Agency was mandated to develop all options of operator certificates: 1. Single, 2. Dual and, 3. Multiple. This will actually be used by Scandinavian national airport operator companies. What France chooses to use is its decision. It would not be appropriate to take this legally obligatory choice away from the other Member States.</p>
comment	<p>1671 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>(c) It is appropriate to delete the (c) from this AMC. It is about the certificate for one aerodrome and not for several aerodromes. There is non point in listing all the aerodromes operated by the aerodrome operator.</p>
response	<p><i>Not accepted</i></p> <p>The multiple aerodrome operator certificate is an option as per Art. 8a 2(d) and the Agency was mandated to develop all options of operator certificates: 1. Single, 2. Dual, and 3. Multiple. This will actually be used by Scandinavian national airport operator companies. What France chooses to use is its decision. It would not be appropriate to take this legally obligatory choice away from the other Member States.</p>
comment	<p>1818 comment by: <i>ADBM - Aeroport de Bordeaux Merignac -</i></p>

	<i>BOD/LFBD</i>
	Attachment #45
	ADB M - NPA 2011-20 (B.II) AMC1-ADR.AR.C.035(d) (1);(2)
	Référence: AMC1-ADR.AR.C.035(d) (1) ; (2) Issuance of certificate ISSUANCE OF SEPARATE CERTIFICATES
	Traduction de courtoisie (c) It is appropriate to delete the (c) from this AMC. It is about the certificate for one aerodrome and not for several aerodromes. There is non point in listing all the aerodromes operated by the aerodrome operator.
response	Not accepted The multiple aerodrome operator certificate is an option as per Art. 8a 2(d) and the Agency was mandated to develop all options of operator certificates: 1. Single, 2. Dual, and 3. Multiple. This will actually be used by Scandinavian national airport operator companies. What France chooses to use is its decision. It would not be appropriate to take this legally obligatory choice away from the other Member States.
comment	1959 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i> (c) It is appropriate to delete the (c) from this AMC. It is about the certificate for one aerodrome and not for several aerodromes . There is non point in listing all the aerodromes operated by the aerodrome operator
response	<i>Not accepted</i> The multiple aerodrome operator certificate is an option as per Art. 8a 2(d) and the Agency was mandated to develop all options of operator certificates: 1. Single, 2. Dual, and 3. Multiple. This will actually be used by Scandinavian national airport operator companies. What France chooses to use is its decision. It would not be appropriate to take this legally obligatory choice away from the other Member States.
comment	1976 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i> (c) It is appropriate to delete the (c) from this AMC. It is about the certificate for one aerodrome and not for several aerodromes. There is non point in listing all the aerodromes operated by the aerodrome operator Each aerodrome must operate by himself, with its own characteristics.
response	<i>Not accepted</i> The multiple aerodrome operator certificate is an option as per Art. 8a 2(d) and the Agency was mandated to develop all options of operator certificates: 1. Single, 2. Dual, and 3. Multiple. This will actually be used by Scandinavian national airport operator companies. What France chooses to use is its decision. It would not be appropriate to take this legally obligatory choice away from the other Member States.

Obviously, the multiple aerodrome operator option comes with individual Certifications bases (Plural), as each aerodrome is individual. So the multiple airport operator needs to list its aerodromes.

comment 2305 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*
A reprendre

response Not accepted
The multiple aerodrome operator certificate is an option as per Art. 8a 2(d) and the Agency was mandated to develop all options of operator certificates: 1. Single, 2. Dual, and 3. Multiple. This will actually be used by Scandinavian national airport operator companies. What France chooses to use is its decision. It would not be appropriate to take this legally obligatory choice away from the other Member States.

comment 2361 comment by: *CANSO Civil Air Navigation Services Organization*
If an aerodrome operator operates several aerodromes some of which could in other member states or further afield how is the certification issuance affected?

response *Noted*
There is no mutual recognition of aerodrome operator certificates across Europe. Recital (8) of Regulation (EC) No 1108/2009 states clearly that: 'Member States may certify aerodrome infrastructure and operations separately. In that case certificates should be delivered by the same authority.' Therefore, the case described in the comment will not exist. The operator would always have to obtain a certificate from the competent authority of the Member State where the aerodrome is located.

comment 2631 comment by: *Fraport AG*
AMC1-ADR.AR.C.035(d)(1);(2) – Issuance of certificate (b)

Question

In the case there is a possibility to issue separate certificates, both certificates should be issued by the same competent authority.

Clarification how this should work for aerodromes which have their activities in different countries.

Fraport AG
Have no idea how this should work when the ADR operator has its activities in different countries.

response *Noted*
There is no mutual recognition of aerodrome operator certificates across Europe. Recital (8) of Regulation (EC) No 1108/2009 states clearly that: 'Member States may certify aerodrome infrastructure and operations

separately. In that case certificates should be delivered by the same authority.' Therefore, the case described in the comment will not exist. The operator would always have to obtain a certificate from the competent authority of the Member State where the aerodrome is located.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.035(f) – Issuance of certificate p. 29

comment 967 comment by: *NATS National Air Traffic Services Limited*
The title of this AMC is "Limitations and procedures"; however the related IR refers to "conditions and limitations". Suggest change title to "Conditions and Limitations".

response Accepted
The text was changed to say 'operating conditions or limitations'.

comment 969 comment by: *NATS National Air Traffic Services Limited*
AMC1-ADR.AR.C.035(f)(a) - The related IR does not mention "operating procedures" but it does mention "conditions". Suggest change "operating procedures" to "conditions".

response *Accepted*
The text was changed to say 'operating conditions or limitations'.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.035(g) – Issuance of certificate p. 29-30

comment 970 comment by: *NATS National Air Traffic Services Limited*
The related IR describes the need for the CA to approve the procedure for changes that do not require prior approval. This AMC does not appear to reflect intent of the IR insofar as it relates to the process to be followed by the aerodrome inspectors when assessing the scope of the change.

response Not accepted
The related IR now reads like this:

(g) To enable an aerodrome operator to implement changes without prior competent authority approval, in accordance with ADR.OR.B.040(d), the competent authority shall approve a procedure defining the scope of such changes and describing how such changes will be managed and notified.

This says that the notification procedure described here will be proposed

by the aerodrome operator; it should contain suggestions on how different type of changes can be managed and notified, and in what time frame such notified changes should be reacted to by the authority when it wants to obtain further information, or if it disagrees with this being implemented without its prior approval. Therefore, the AMC1-ADR.AR.C.035 (g) has been slightly changed to mirror this intent.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.040(a) – Changes p. 30-31

comment	71	comment by: <i>Flughafen Düsseldorf GmbH</i>
	<p>(c) (c) The competent authority should document and notify in writing the aerodrome operator: (1) the applicable certification specifications that it has identified to be applicable in accordance with the previous paragraphs;</p> <p>(2) any special conditions, or amendments to special conditions it <u>finds necessary</u>[g1] ; and</p> <p>(3) (3) any provisions for which the competent authority has accepted the applicant to demonstrate an equivalent level of safety; and</p> <hr/> <p>[g1]Hier sollte doch ein etwas objektiverer Maßstab gewählt werden (z.B. „as appropriate“)</p>	
response	Not accepted	
	On AMC1-ADR.AR.C.040(a) – Changes (c)(3): The competent authority will, of course, justify if it does not accept the ELOS, as is good administrative code of conduct. If it does not, the legal recourse would be open to the applicant.	
comment	91	comment by: <i>CAA Norway</i>
	Editorial: Wrong reference in AMC1-ADR.AR.C.040 (a), (a)(5) on page 30: Should refer to ADR.OR.B.045. Editorial: AMC1-ADR.AR.C.040 (a), (d) on page 30: Which paragraph 3 does it refer to? Please clarify.	
response	<i>Accepted</i>	
	On wrong reference: Agreed. The text was changed. On needed clarification: Agreed. It was rectified.	
comment	413	comment by: <i>Estonian CAA</i>
	"Editorial: Wrong reference in AMC1-ADR.AR.C.040 (a), (a)(5) on page 30: Should refer to ADR.OR.B.045. Editorial: AMC1-ADR.AR.C.040 (a), (d) on page 30: Which paragraph 3	

	does it refer to? Please clarify."
response	Accepted On wrong reference: Agreed. The text was changed. On needed clarification: Agreed. It was rectified.
comment	448 comment by: <i>Icelandic Civil Aviation Administration</i> Editorial: Wrong reference in AMC1-ADR.AR.C.040 (a), (a)(5) on page 30: Should refer to ADR.OR.B.045. Editorial: AMC1-ADR.AR.C.040 (a), (d) on page 30: Which paragraph 3 does it refer to? Please clarify.
response	Accepted On wrong reference: Agreed. The text was changed. On needed clarification: Agreed. It was rectified.
comment	653 comment by: <i>Finnish Transport Safety Agency</i> Editorial: Wrong reference in AMC1-ADR.AR.C.040 (a), (a)(5) on page 30: Should refer to ADR.OR.B.045. Editorial: AMC1-ADR.AR.C.040 (a), (d) on page 30: Which paragraph 3 does it refer to? Please clarify.
response	Accepted On wrong reference:Agreed. The text was changed. On needed clarification:Agreed. It was rectified.
comment	971 comment by: <i>NATS National Air Traffic Services Limited</i> There are two AMC to ADR.AR.C.040(a) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merge the two AMC into a single AMC.
response	<i>Noted</i> GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.
comment	973 comment by: <i>NATS National Air Traffic Services Limited</i> AMC1-ADR.AR.C.040(a)(a)(5) The AMC refers to "AMC1-ADR.AR.C.035(b)" which does not exist.

	<p>The AMC refers to "AMC1-ADR.AR.B.065" which is "Termination of service" and does not appear relevant to this AMC.</p>
response	<p>Accepted</p> <p>On wrong reference:Agreed. The text was changed. It should refer to AMC1-ADR.AR.C.035 (a);(b)</p> <p>On wrong reference of ADR.OR.B.065:Agreed. The text was changed. Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).</p>
comment	<p>974 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>AMC1-ADR.AR.C.040(a)(d) - The AMC refers to "paragraph 3", but which paragraph 3?</p>
response	<p>Accepted</p> <p>On wrong reference: Agreed. The text was changed.</p> <p>On needed clarification: Agreed. It was rectified. Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).</p>
comment	<p>975 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>The AMC refers to "paragraph 3 or 4", but which paragraph 3 or 4?</p>
response	<p>Accepted</p> <p>On wrong reference: Agreed. The text was changed.</p> <p>On needed clarification: Agreed. It was rectified. Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).</p>
comment	<p>1133 comment by: <i>Danish Transport Authority</i></p> <p>Editorial: Wrong reference in AMC1-ADR.AR.C.040 (a), (a)(5) on page 30: Should refer to ADR.OR.B.045. Editorial: AMC1-ADR.AR.C.040 (a), (d) on page 30: Which paragraph 3 does it refer to? Please clarify.</p>
response	<p>Accepted</p> <p>On wrong reference: Agreed. The text was changed.</p> <p>On needed clarification: Agreed. It was rectified. Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).</p>
comment	<p>1167 comment by: <i>Federal Office of Civil Aviation FOCA</i></p> <p>AMC1-ADR.AR.C.040 (a), (c) (1) - Changes: replace "the applicable" with "any additional". Applicable certification specifications are proposed by aerodrome operator, therefore it is sufficient for the authority to verify and complete if necessary.</p>

AMC1-ADR.AR.C.040 (a), (c) (2) - Changes: Please add "additional" to change the sentence to "any additional special conditions...". Applicable special conditions are proposed by aerodrome operator, therefore it is sufficient for the authority to verify and complete if necessary.

AMC1-ADR.AR.C.040 (a), (c) (3) - Changes: please add "additional" to change the sentence to "any additional provisions...". Applicable provisions are proposed by aerodrome operator, therefore it is sufficient for the authority to verify and complete if necessary.

General remark with regard to AMC1-ADR.AR.C.040 (a), AMC2-ADR.AR.C.040 (a), AMC1-ADR.AR.C.040 (f) and AMC2-ADR.AR.C.040 (f): Please simplify and concentrate the text of all provisions. Justification: Provisions are far too detailed and therefore of limited use.

response

Not accepted

AMC1-ADR.AR.C.040 (a), (c) (1) - Changes: Partially agreed.
The first 'applicable' is redundant. However, the Competent Authority will analyse the CS proposed as applicable for the change as mentioned in the operators application, and notify those, as well as any additional ones, that may not have been included in the application. Please note that the legal notification of all applicable CS is necessary for the applicant to have legal certainty that his analysis is correct. This is just one sentence if all is correct and, therefore, not too much detail.

On AMC1-ADR.AR.C.040 (a), (c) (2) - Changes: Not agreed.
There may be cases where there were no special conditions before. Therefore, adding 'additional' here would imply that there were. The sentence is more logical as is. It might be good to change it to become (3) instead of (2) as the SC are usually cited after the ELOS. Therefore, (3) would become (2).

On AMC1-ADR.AR.C.040 (a), (c) (3) - Changes: Not agreed.
The reason for not agreeing is that there may not have been any ELOS before, and the word additional would suggest that there were.

On general remark: Not agreed. The provisions give the procedures that can be used on how to treat changes requiring prior approval and those not requiring prior approval. If they are followed, compliance with the rule can be assumed. This gives legal certainty to both sides.

comment

1232

comment by: UK CAA

Page No: 30

Paragraph No: AMC1-ADR.AR.C.040

Comment: In a total system approach we look for consistency and compatibility over the provisions governing SMS, including the management of change. This is particularly difficult in this domain because aerodrome operators are often entwined with ANSPs which are currently subject to rules inherited from the SES environment. It will be important to consider how processes in these areas can best be aligned or made compatible with each other, together with those of other organisations active at aerodromes, such as air operators and ground

	<p>handlers, to ensure a total system approach to oversight</p> <p>Justification: Commonality and standardisation of processes.</p>
response	Noted
comment	<p>1234 comment by: UK CAA</p> <p>Page No: 30</p> <p>Paragraph No: AMC1-ADR.AR.C.040(a) (c) (1)</p> <p>Comment: Paragraph AMC1-ADR.AR.C.040(a) (a) (2) states that the competent authority should ensure the aerodrome operator has identified all the certification specification related to the proposed change. Therefore, it is inappropriate, and conflicting, to require the competent authority to notify in writing to the aerodrome operator, the applicable certification specifications it has identified to be applicable to the proposed change. Therefore, we suggest the para be deleted.</p> <p>Justification: Best practice and least demanding on resource, would be for the aerodrome operator to identify those CSs it feels are applicable to the proposed change. This could be easily achieved by the project team established to manage the change. Once this has been submitted to the competent authority, they will check to ensure they have captured all the relevant CS and will be part of the discussion process the competent authority will have with the aerodrome operator leading to approval, or not, of the change.</p> <p>Proposed Text: NIL</p>
response	<p>Not accepted</p> <p>Not agreed. The (c) closes the loop between the authority and the applicant for a change. The formal notification of what was accepted or not is the closure of the loop of having assessed the <u>proposed</u> applicable CS and the ELOS proposed, and any special conditions that the authority deems necessary.</p>
comment	<p>1422 comment by: Swedish Transport Agency</p> <p>Editorial: Wrong reference in AMC1-ADR.AR.C.040 (a), (a)(5) on page 30: Should refer to ADR.OR.B.045.</p> <p>Editorial: AMC1-ADR.AR.C.040 (a), (d) on page 30: Which paragraph 3 does it refer to? Please clarify.</p>
response	<p>Accepted</p> <p>On wrong reference: Agreed. The text was changed. Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).</p> <p>On needed clarification: Agreed. It was rectified.</p>
comment	<p>2269 comment by: Airport St. Gallen-Altenrhein - ACH/LSZR</p> <p>Revise and simplify, too complex and too complicated.</p>

response Not accepted
On general remark: Not agreed.
The provisions give the procedures that can be used on how to treat changes requiring prior approval and those not requiring prior approval. If they are followed, compliance with the rule can be assumed. This gives legal certainty to both sides.

comment 2271 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
replace "the applicable" with "any additional"

response *Partially accepted*
AMC1-ADR.AR.C.040 (a), (c) (1) - Changes: Partially agreed.
The first 'applicable' is redundant. However, the Competent Authority will analyse the CS proposed as applicable for the change as mentioned in the operators application and notify those as well as any additional ones, that may not have been included in the application. Please note that the legal notification of all applicable CS is necessary for the applicant to have legal certainty that his analysis is correct. This is just one sentence if all is correct, and, therefore, not too much detail.

comment 2272 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
add "additional" to make the sentence "any additional special conditions..."

response Not accepted
On AMC1-ADR.AR.C.040 (a), (c) (2) - Changes: Not agreed.
There may be cases where there were no special conditions before. Therefore, adding 'additional' here would imply that there were. The sentence is more logical as is. It might be good to change it to become (3) instead of (2) as the SC are usually cited after the ELOS. Therefore, (3) would become (2).

comment 2274 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
add "additional" to make the sentence "any additional provisions..."

response Not accepted
On AMC1-ADR.AR.C.040 (a), (c) (3) - Changes: Not agreed.
The reason for not agreeing is that there may not have been any ELOS before, and the word additional would suggest that there were.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC2-ADR.AR.C.040(a) – Changes p. 31

comment 978 comment by: *NATS National Air Traffic Services Limited*
There are two AMC to ADR.AR.C.040(a) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy

the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the two AMC into a single AMC.

response

Noted

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment

2270

comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*

Revise and simplify, too complex and too complicated.

response

Accepted

The provisions were deleted.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION p. 31-32 AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.040(f) – Changes

comment

92

comment by: *CAA Norway*

Please check reference in AMC1-ADR.AR.C.040 (f), (a)(5) on page 31. This should be ADR.OR.B.045 instead of 065.

response

Accepted

On wrong reference: Agreed.

On AMC1 -ADR.AR.C.040(f) – Changes: The Agency has even deleted this AMC because the IR ADR.AR.C.040 under (f) already covers how the authority should treat the notified change. The IR was enhanced to refer back to the procedure established under ADR.AR.C.035 (g). Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).

comment

415

comment by: *Estonian CAA*

Please check reference in AMC1-ADR.AR.C.040 (f), (a)(5) on page 31. This should be ADR.OR.B.045 instead of 065.

response

Accepted

On wrong reference: Agreed.

On AMC1 -ADR.AR.C.040(f) – Changes: The Agency has even deleted this AMC because the IR ADR.AR.C.040 under (f) already covers how the authority should treat the notified change. The IR was enhanced to refer back to the procedure established under ADR.AR.C.035 (g). Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).

comment

451

comment by: *Icelandic Civil Aviation Administration*

Please check reference in AMC1-ADR.AR.C.040 (f), (a)(5) on page 31. This

response

should be ADR.OR.B.045 instead of 065.

Accepted

On wrong reference: Agreed.

On AMC1 -ADR.AR.C.040(f) – Changes: The Agency has even deleted this AMC because the IR ADR.AR.C.040 under (f) already covers how the authority should treat the notified change. The IR was enhanced to refer back to the procedure established under ADR.AR.C.035 (g). Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).

comment

855 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.A.015 (d) – Means of compliance (p16-17)
- ANNEX I - Part-AR - ADR.AR.B.005 (d) – Management system (p20)
- ANNEX I - Part-AR - ADR.AR.C.040(f) – Changes (26-27)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.005(d) – Management system (p13-14)
- AMC/GM to ANNEX I – Part-AR – AMC1 -ADR.AR.C.040(f) – Changes (p31-32)
- AMC/GM to ANNEX I – Part-AR – AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33)
- AMC/GM to ANNEX I – Part-AR - GM1-ADR.AR.C.035(a)(3) – Changes (p28)
- AMC/GM to ANNEX I – Part-AR - GM1-ADR.AR.C.040(c) – Changes (p33)
- ANNEX II - Part-OR – ADR-OR.B.040(a) – Changes (p41-42)
- AMC/GM to ANNEX II – Part-OR – AMC1-ADR.OR.B.040(a) – Changes (p60-61)

This comment is linked with comment number 1101 in book I.

2. General comment

These paragraphs lead to many formal exchanges that are not always relevant and that considerably increase the administrative burden of:

- both the EASA and the competent authority for ADR.AR.A.015 (d), ADR.AR.B.005 (d) and the corresponding acceptable means of compliance and
- both the aerodrome operator and the competent authority for ADR.AR.C.040(f) and the corresponding acceptable means of compliance.

3. Justification and proposed text / comment

- Paragraph (d) of ADR.AR.A.015

Minor alternative AMC to the ones proposed by EASA may be accepted, due to local special constraints. In order to avoid administrative burden both for the EASA and the competent authority, it is proposed to only notify the "significant" alternative AMC, i.e. the ones which differs notably from the EASA's ones and the ones that will be applied on a national scale.

Paragraph (d) of ADR.AR.A.015 requires notification of these alternatives AMC to all other Member States which amplifies considerably the aforementioned administrative burden, in particular for AMC that may not be usable or relevant for other aerodromes.

Paragraph (d) of ADR.AR.A.015 also implies that alternative AMC that could be possibly rejected by EASA will be notified to other Member States, without them knowing of the acceptability the alternative AMC. It is proposed to delete this requirement and let EASA inform all the Member States (for example, through a website) of the AMC that are deemed acceptable.

In order to limit the administrative burden to the most pertinent, DGAC proposes the following modifications of ADR.AR.A.015:

ADR.AR.A.015 – Means of compliance

" [...]

(d) [...] When the competent authority finds that the alternative means of compliance proposed by the aerodrome operator or the provider of apron management services are in accordance with the Implementing Rules, it shall without undue delay:

(1) notify the applicant that the alternative means of compliance may be implemented and, if applicable, amend the approval or certificate of the applicant accordingly;

(2) notify the Agency of their content of the significant ones, including copies of the relevant documentation;

~~*(3) inform other Member States about alternative means of compliance that were accepted.*~~

(e) [...] The competent authority shall provide the Agency with a full description of the significant alternative means of compliance, including any revisions to procedures that may be relevant, as well as an assessment demonstrating that the Implementing Rules are met. "

- Paragraph (d) of ADR.AR.B.005 and AMC1-ADR.AR.B.005 (d)

The adaptation of the procedures of the competent authority is a living and ongoing processes. In order to avoid administrative burden both for the competent authority and the EASA, DGAC proposes to only notify the most significant amendments of the procedures.

ADR.AR.B.005 – Management system

" [...]

(d) A copy of the procedures related to the management system and their significant amendments shall be made available to the Agency for the purpose of standardisation."

AMC1-ADR.AR.B.005 (d) – Management system

"PROCEDURES AVAILABLE TO THE AGENCY

(a) Copies of the procedures in the competent authority's management system should be made available to the Agency for the purpose of standardisation. These should include any significant amendments to the procedures. The procedures should provide at least the following information:

[...]"

- Paragraph (f) of ADR.AR.C.040 and AMC1-ADR.AR.C.040(f)

The tasks allocated to the competent authority for "changes not requiring prior approval" are as high as for those requiring prior approval which is not pertinent.

Considering the numerous changes notified to the competent authority, this would lead to high workload incompatible with available resources. Furthermore, since every change would be thoroughly examined by the competent authority and providing no comment would be considered as implied approval, this would remove responsibility for the change from the aerodrome operator to the competent authority.

This is a **critical** point for DGAC that proposes the following changes to deal with it:

ADR.AR.C.040 – Changes

"[...] (f) For changes not requiring prior approval, the competent authority shall assess the information provided in the notification sent by the aerodrome operator in accordance with ADR.OR.B.040 to verify compliance with the Certification Specifications **basis** ~~issued by the Agency and the applicable requirements, as appropriate.~~ In case of any non-compliance, the competent authority shall:

(1) notify the aerodrome operator about the non-compliance and request further changes; and

(2) in case of level 1 or level 2 findings, act in accordance with Article ADR.AR.C.055.

[...]"

AMC1 -ADR.AR.C.040(f) – Changes – page 31

"CHANGES NOT REQUIRING PRIOR APPROVAL

(a) Upon receiving a notification of a change that does not require a prior approval, the competent authority should:

(1) assess the change ~~in relation to~~ **is compliant with** the certification basis ~~and the applicable requirements of Part ADR.OR, Part ADR.OPS, as well as any other applicable requirements;~~

(2) ~~assess if the aerodrome operator has identified all the certification specifications, applicable requirements of Part ADR.OR, Part ADR.OPS, or other applicable requirements which are related to or affected by the change, as well as any cases related to demonstration of an equivalent level of safety;~~

(3) ~~assess the actions proposed by the aerodrome operator in order to show compliance with (1) and (2) above;~~

(4) ~~review and assess the content of the changes to the aerodrome manual; and;~~

(5) ~~evaluate~~ **check that** the safety assessment ~~that has been submitted by the aerodrome operator, in accordance with AMC1-ADR.AR.C.035(b) and verify its compliance with ADR.OR.B.065~~ **coordinated with third parties, and that it properly identifies risks and mitigation means.**

[...]"

- AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33) and GM1-ADR.AR.C.035(a)(3) – Changes (p28)

In paragraph (a), the changes in nominated persons should not be transmitted to the competent authority as they are not significant safety related matter. The competency of nominated persons should be assessed by the aerodrome operator within its SMS, and the authority will oversee the SMS functioning is adequate, but not assess directly the competency of aerodrome operator staff. The word "qualification" should be avoided (see comment n°869 on qualifications). It is consequently proposed to

delete this paragraph.

In paragraph (c): only significant amendments of the management system documentation should be notified to the competent authority.

It is consequently proposed to modify AMC3 -ADR.AR.C.040(a);(f) – Changes as follows :

AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33)

GENERAL

~~(a) Changes in nominated persons: The competent authority should be informed of any changes to personnel specified in Part ADR.OR that may affect the certificate or the terms of approval attached to it. When an aerodrome operator submits the name of a nominee for the nominated persons mentioned in ADR.OR.D.015, the competent authority should assess his/her qualifications and may interview the nominee or call for additional evidence of his/her suitability before deciding upon his/her acceptability (see GM1-ADR.AR.C.035 (a)(3)).~~

~~(b) A documented systematic approach should be used for maintaining the information on when an amendment was received by the competent authority and when it was approved.~~

~~(c) The competent authority should receive from the aerodrome operator each **significant** management system documentation amendment, including amendments that do not require prior approval by the competent authority. Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should indicate its approval in writing. Where the amendment does not require prior approval, the competent authority should acknowledge receipt in writing within the time limits existing under the relevant national legislation.~~

~~[...]"~~

and delete GM1-ADR.AR.C.035(a)(3) – Changes

GM1-ADR.AR.C.040(c)

It is agreed that any changes to the terms of approval of the certificate should be prior approved by the competent authority. However, this does not systematically lead to the formal change of the certificate itself : for a temporary change the formal process of modifying the certificate might take longer than the changes itself.

It is proposed to modify GM1-ADR.AR.C.040(c) : change "~~irrespective of their magnitude~~" by "**where appropriate**"

- Paragraph (a) of ADR.OR.B.040 and AMC1-ADR.OR.B.040(a)

Paragraph (a)(3) of ADR.OR.B.040 is not clear on which entity (the competent authority or the aerodrome operator) decides whether a change needs to be approved by the competent authority or not. DGAC proposes modify it to indicate more explicitly that these changes are those that the competent authority finds necessary to be approved:

ADR.OR.B.040 – Changes

"(a) Any **significant** change affecting:

(1) the terms of approval of the certificate; or

(2) any of the elements of the operator's management system as required in ADR.OR.D.005 (b)(1), (b)(3), (b)(4), (b)(6) and (b)(7); or

(3) any additional elements notified to the competent authority in accordance with paragraph (c) but ~~found necessary to be approved by the competent authority~~ found necessary by the competent authority to be approved, shall require prior approval by the competent authority. [...]"

Paragraph (b) of AMC1-ADR.OR.B.040(a) gives too much details while flexibility is needed and the changes requiring prior approval by the competent authority are already defined in accordance with paragraph (a) and (c) of ADR.OR.B.040. It is essential to delete this paragraph to prevent from useless increased administrative burden between the aerodrome operator and the competent authority.

AMC1-ADR.OR.B.040(a) – Changes

"CHANGES REQUIRING PRIOR APPROVAL

[...]"

(b) ~~Examples of such changes include, but are not limited to, the following:~~

(1) ~~changes to the physical characteristics of a runway; such as:~~

(i) ~~new runway(s): a development resulting in the construction of a 'new' runway (e.g. new construction, or the change of an existing grass surface to a paved surface);~~

(ii) ~~runway extension or shortening resulting in an amendment to declared distances;~~

(iii) ~~threshold relocation (Instrument Status): a development involving relocation of the instrument runway threshold, or relocation of a non-instrument runway threshold in preparation for instrument status;~~

(iv) ~~changes to runway designation.~~

(2) ~~changes of the aerodrome visual aids or other changes to the aerodrome, when such changes are associated with a change (upgrade or downgrade) of the intended operations (e.g. to accommodate low visibility operations and/or night operations);~~

(3) ~~changes in the aerodrome operating minima;~~

(4) ~~change that affects the obstacle limitation surfaces associated with approved type of approaches;~~

(5) ~~change in the level of the rescue and fire-fighting services;~~

(6) ~~changes in the organisational structure of the organisation, including responsibilities, and accountabilities;~~

(7) ~~changes related to fuel provision."~~

response

Accepted

On AMC1 -ADR.AR.C.040(f) – Changes : The Agency has even deleted this AMC because the IR ADR.AR.C.040 under (f) already covers how the authority should treat the notified change. The IR was enhanced to refer back to the procedure established under ADR.AR.C.035 (g).

comment

980

comment by: NATS National Air Traffic Services Limited

There are three AMC to ADR.AR.C.040(f) which are not three different ways of satisfying the IR, rather all must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple

	<p>acceptable means of compliance? Suggest merging the three AMC into a single AMC.</p>
response	<p><i>Noted</i></p> <p>GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.</p> <p>On AMC1 -ADR.AR.C.040(f) — Changes : The Agency has even deleted this AMC because the IR ADR.AR.C.040 under (f) already covers how the authority should treat the notified change. The IR was enhanced to refer back to the procedure established under ADR.AR.C.035 (g).</p>
comment	<p>1134 comment by: Danish Transport Authority</p> <p>EDITORIAL: Check reference under item (a)(5). This should be ADR.OR.B.045 instead of 065.</p>
response	<p>Accepted</p> <p>On wrong reference: Agreed.</p> <p>On AMC1 -ADR.AR.C.040(f) — Changes: The Agency has even deleted this AMC because the IR ADR.AR.C.040 under (f) already covers how the authority should treat the notified change. The IR was enhanced to refer back to the procedure established under ADR.AR.C.035 (g).</p>
comment	<p>1423 comment by: Swedish Transport Agency</p> <p>Pls check reference in AMC1-ADR.AR.C.040 (f), (a)(5) on page 31. This should be ADR.OR.B.045 instead of 065. Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).</p>
response	<p>Accepted</p> <p>On wrong reference: Agreed.</p> <p>On AMC1 -ADR.AR.C.040(f) — Changes: The Agency has even deleted this AMC because the IR ADR.AR.C.040 under (f) already covers how the authority should treat the notified change. The IR was enhanced to refer back to the procedure established under ADR.AR.C.035 (g). Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).</p>
comment	<p>1786 comment by: AESA - Agencia Estatal de Seguridad Aérea</p> <p>Page 32/176</p> <p>(e) When notifying the applicant in accordance with paragraph 4, the competent authority should also inform him/her of the right of appeal, as exists under the applicable national legislation.</p> <p><i>This point should be checked because in accordance with paragraph 4 doesn't have any sense in this context.</i></p>

response Accepted

On AMC1 -ADR.AR.C.040(f) — Changes : The Agency has even deleted this AMC because the IR ADR.AR.C.040 under (f) already covers how the authority should treat the notified change. The IR was enhanced to refer back to the procedure established under ADR.AR.C.035 (g).
Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).

NPA 2011-20 (B.II) — AMC/GM to ANNEX I — Part Authority Requirements (Part-AR) — SUBPART C — OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) — AMC2-ADR.AR.C.040(f) — Changes p. 32

comment 982 comment by: *NATS National Air Traffic Services Limited*

There are three AMC to ADR.AR.C.040(f) which are not three different ways of satisfying the IR, rather all must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the three AMC into a single AMC.

response Partially accepted

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.
On AMC1 -ADR.AR.C.040(f) — Changes : The Agency has even deleted this AMC because the IR ADR.AR.C.040 under (f) already covers how the authority should treat the notified change. The IR was enhanced to refer back to the procedure established under ADR.AR.C.035 (g).
Note that ADR.OR.B.045 was made into ADR.OR.B.040 (f).

NPA 2011-20 (B.II) — AMC/GM to ANNEX I — Part Authority Requirements (Part-AR) — SUBPART C — OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) — AMC3-ADR.AR.C.040(a);(f) — Changes p. 32-33

comment 855 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.A.015 (d) — Means of compliance (p16-17)
- ANNEX I - Part-AR - ADR.AR.B.005 (d) — Management system (p20)
- ANNEX I - Part-AR - ADR.AR.C.040(f) – Changes (26-27)
- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.B.005(d) — Management system (p13-14)
- AMC/GM to ANNEX I — Part-AR — AMC1 -ADR.AR.C.040(f) — Changes (p31-32)
- AMC/GM to ANNEX I — Part-AR — AMC3 -ADR.AR.C.040(a);(f) —

- Changes (p32-33)
- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.035(a)(3) - Changes (p28)
- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.040(c) - Changes (p33)
- ANNEX II - Part-OR – ADR-OR.B.040(a) – Changes (p41-42)
- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.B.040(a) — Changes (p60-61)

This comment is linked with comment number 1101 in book I.

2. General comment

These paragraphs lead to many formal exchanges that are not always relevant and that considerably increase the administrative burden of:

- both the EASA and the competent authority for ADR.AR.A.015 (d), ADR.AR.B.005 (d) and the corresponding acceptable means of compliance and
- both the aerodrome operator and the competent authority for ADR.AR.C.040(f) and the corresponding acceptable means of compliance.

3. Justification and proposed text / comment

- Paragraph (d) of ADR.AR.A.015

Minor alternative AMC to the ones proposed by EASA may be accepted, due to local special constraints. In order to avoid administrative burden both for the EASA and the competent authority, it is proposed to only notify the "significant" alternative AMC, i.e. the ones which differs notably from the EASA's ones and the ones that will be applied on a national scale. Paragraph (d) of ADR.AR.A.015 requires notification of these alternatives AMC to all other Member States which amplifies considerably the aforementioned administrative burden, in particular for AMC that may not be usable or relevant for other aerodromes.

Paragraph (d) of ADR.AR.A.015 also implies that alternative AMC that could be possibly rejected by EASA will be notified to other Member States, without them knowing of the acceptability the alternative AMC. It is proposed to delete this requirement and let EASA informs all the Member States (for example, through a website) of the AMC that are deemed acceptable.

In order to limit the administrative burden to the most pertinent, DGAC proposes the following modifications of ADR.AR.A.015:

ADR.AR.A.015 — Means of compliance

" [...]

(d) [...] When the competent authority finds that the alternative means of compliance proposed by the aerodrome operator or the provider of apron management services are in accordance with the Implementing Rules, it shall without undue delay:

(1) notify the applicant that the alternative means of compliance may be implemented and, if applicable, amend the approval or certificate of the applicant accordingly;

(2) notify the Agency of their content of the significant ones, including copies of the relevant documentation;

~~(3) inform other Member States about alternative means of compliance that were accepted.~~

(e) [...] The competent authority shall provide the Agency with a full description of the **significant** alternative means of compliance, including any revisions to procedures that may be relevant, as well as an assessment demonstrating that the Implementing Rules are met. "

- Paragraph (d) of ADR.AR.B.005 and AMC1-ADR.AR.B.005 (d)

The adaptation of the procedures of the competent authority is a living and ongoing processes. In order to avoid administrative burden both for the competent authority and the EASA, DGAC proposes to only notify the most significant amendments of the procedures.

ADR.AR.B.005 – Management system

" [...]

(d) A copy of the procedures related to the management system and their **significant** amendments shall be made available to the Agency for the purpose of standardisation."

AMC1-ADR.AR.B.005 (d) – Management system

"PROCEDURES AVAILABLE TO THE AGENCY

(a) Copies of the procedures in the competent authority's management system should be made available to the Agency for the purpose of standardisation. These should include ~~any~~ **significant** amendments to the procedures. The procedures should provide at least the following information:

[...]"

- Paragraph (f) of ADR.AR.C.040 and AMC1-ADR.AR.C.040(f)

The tasks allocated to the competent authority for "changes not requiring prior approval" are as high as for those requiring prior approval which is not pertinent.

Considering the numerous changes notified to the competent authority, this would lead to high workload incompatible with available resources.

Furthermore, since every change would be thoroughly examined by the competent authority and providing no comment would be considered as implied approval, this would remove responsibility for the change from the aerodrome operator to the competent authority.

This is a **critical** point for DGAC that proposes the following changes to deal with it:

ADR.AR.C.040 – Changes

"[...] (f) For changes not requiring prior approval, the competent authority shall assess the information provided in the notification sent by the aerodrome operator in accordance with ADR.OR.B.040 to verify compliance with the Certification Specifications ~~basis issued by the Agency and the applicable requirements, as appropriate.~~ **basis** issued by the Agency. In case of any non-compliance, the competent authority shall:

(1) notify the aerodrome operator about the non-compliance and request further changes; and

(2) in case of level 1 or level 2 findings, act in accordance with Article ADR.AR.C.055.

[...]"

AMC1 -ADR.AR.C.040(f) – Changes – page 31

"CHANGES NOT REQUIRING PRIOR APPROVAL

(a) Upon receiving a notification of a change that does not require a prior approval, the competent authority should:

(1) assess the change in relation to is compliant with the certification basis and the applicable requirements of Part ADR.OR, Part ADR.OPS, as well as any other applicable requirements;

(2) assess if the aerodrome operator has identified all the certification specifications, applicable requirements of Part ADR.OR, Part ADR.OPS, or other applicable requirements which are related to or affected by the change, as well as any cases related to demonstration of an equivalent level of safety;

(3) assess the actions proposed by the aerodrome operator in order to show compliance with (1) and (2) above;

(4) review and assess the content of the changes to the aerodrome manual; and;

(5) evaluate check that the safety assessment that has been submitted by the aerodrome operator, in accordance with AMC1 ADR.AR.C.035(b) and verify its compliance with ADR.OR.B.065 coordinated with third parties, and that it properly identifies risks and mitigation means.

[...]"

- AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33) and GM1-ADR.AR.C.035(a)(3) – Changes (p28)

In paragraph (a), the changes in nominated persons should not be transmitted to the competent authority as they are not significant safety related matter. The competency of nominated persons should be assessed by the aerodrome operator within its SMS, and the authority will oversee the SMS functioning is adequate, but not assess directly the competency of aerodrome operator staff. The word "qualification" should be avoided (see comment n°869 on qualifications). It is consequently proposed to delete this paragraph.

In paragraph (c): only significant amendments of the management system documentation should be notified to the competent authority.

It is consequently proposed to modify AMC3 -ADR.AR.C.040(a);(f) – Changes as follows :

AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33)

GENERAL

(a) Changes in nominated persons: The competent authority should be informed of any changes to personnel specified in Part ADR.OR that may affect the certificate or the terms of approval attached to it. When an aerodrome operator submits the name of a nominee for the nominated persons mentioned in ADR.OR.D.015, the competent authority should assess his/her qualifications and may interview the nominee or call for additional evidence of his/her suitability before deciding upon his/her acceptability (see GM1 ADR.AR.C.035 (a)(3)).

(b) A documented systematic approach should be used for maintaining the information on when an amendment was received by the competent authority and when it was approved.

(c) The competent authority should receive from the aerodrome operator each significant management system documentation amendment, including amendments that do not require prior approval by the competent authority. Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should indicate its

approval in writing. Where the amendment does not require prior approval, the competent authority should acknowledge receipt in writing within the time limits existing under the relevant national legislation.

[...]"

and delete GM1-ADR.AR.C.035(a)(3) – Changes

GM1-ADR.AR.C.040(c)

It is agreed that any changes to the terms of approval of the certificate should be prior approved by the competent authority. However, this does not systematically lead to the formal change of the certificate itself : for a temporary change the formal process of modifying the certificate might take longer than the changes itself.

It is proposed to modify GM1-ADR.AR.C.040(c) : change "~~irrespective of their magnitude~~" by "**where appropriate**"

- Paragraph (a) of ADR.OR.B.040 and AMC1-ADR.OR.B.040(a)

Paragraph (a)(3) of ADR.OR.B.040 is not clear on which entity (the competent authority or the aerodrome operator) decides whether a change needs to be approved by the competent authority or not. DGAC proposes modify it to indicate more explicitly that these changes are those that the competent authority finds necessary to be approved:

ADR.OR.B.040 – Changes

*"(a) Any **significant** change affecting:*

(1) the terms of approval of the certificate; or

(2) any of the elements of the operator's management system as required in ADR.OR.D.005 (b)(1), (b)(3), (b)(4), (b)(6) and (b)(7); or

*(3) any additional elements notified to the competent authority in accordance with paragraph (c) ~~but found necessary to be approved by the competent authority~~ **found necessary by the competent authority to be approved,***

shall require prior approval by the competent authority.

[...]"

Paragraph (b) of AMC1-ADR.OR.B.040(a) gives too much details while flexibility is needed and the changes requiring prior approval by the competent authority are already defined in accordance with paragraph (a) and (c) of ADR.OR.B.040. It is essential to delete this paragraph to prevent from useless increased administrative burden between the aerodrome operator and the competent authority.

AMC1-ADR.OR.B.040(a) – Changes

"CHANGES REQUIRING PRIOR APPROVAL

[...]

~~(b) Examples of such changes include, but are not limited to, the following:~~

~~(1) changes to the physical characteristics of a runway; such as:~~

~~(i) new runway(s): a development resulting in the construction of a 'new' runway (e.g. new construction, or the change of an existing grass surface to a paved surface);~~

~~(ii) runway extension or shortening resulting in an amendment to declared distances;~~
~~(iii) threshold relocation (Instrument Status): a development involving relocation of the instrument runway threshold, or relocation of a non-instrument runway threshold in preparation for instrument status;~~
~~(iv) changes to runway designation.~~
~~(2) changes of the aerodrome visual aids or other changes to the aerodrome, when such changes are associated with a change (upgrade or downgrade) of the intended operations (e.g. to accommodate low visibility operations and/or night operations);~~
~~(3) changes in the aerodrome operating minima;~~
~~(4) change that affects the obstacle limitation surfaces associated with approved type of approaches;~~
~~(5) change in the level of the rescue and fire fighting services;~~
~~(6) changes in the organisational structure of the organisation, including responsibilities, and accountabilities;~~
~~(7) changes related to fuel provision."~~

response

Not accepted

On AMC3- ADR.AR.C.040 (a);(f) – Changes (a)

Not agreed. ADR.OR.D.015 – Personnel requirements foresees nominated personnel.

The assessment of the acceptability of nominated persons is foreseen also under Doc. 9774 of ICAO under 3.D.2 Competence of operational and maintenance personal. The USOAP protocol questions also feature a question on this:

'AGA 8.087 Does the aerodrome regulatory authority ensure that aerodrome operators employ competent personnel to perform all critical activities for aerodrome operations and maintenance?'

Please note that the authority is not involved in the designation of nominated persons, that is up to the organisation, but the authority should check on their acceptability in terms of their qualification and , if need be, interview them. This part of the verification of compliance of the operator with all the IRs relevant to it. (ADR.OR.B.025 – compliance).

comment

983

comment by: *NATS National Air Traffic Services Limited*

There are three AMC to ADR.AR.C.040(f) which are not three different ways of satisfying the IR, rather all must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the three AMC into a single AMC.

response

Noted

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

comment

1236

comment by: *UK CAA*

Page No: 33

Paragraph No: AMC3-ADR.AR.C.040(a);(f) (c)

Comment: The competent authority does not need to see all management system changes, this would cause undue workload. The changes that do not need prior competent authority, but would be of interest to the competent authority, would be addressed through the aerodrome manual.

Justification: All changes of the management system sent to the competent authority would require additional resource by both the aerodrome operator and the competent authority to process. In most cases the material would be of no benefit to the competent authority.

Proposed Text: (c) Delete first sentence and amend remainder of this paragraph as follows:

Where the amendment **of a document (the Terms of Approval and aerodrome manual)** requires the competent authority's approval, the competent authority, when satisfied, should indicate its approval in writing. Where the amendment does not require prior approval, the competent authority should acknowledge receipt in writing within the time limits existing under the relevant national legislation.

response

Partially accepted

On AMC3- ADR.AR.C.040 (a);(f) – Changes (c)

Partially Agreed. The text was changed to be clearer. However, the documentation needs to be received.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM1-ADR.AR.C.040(c) – Changes (AMENDMENT OF CERTIFICATE)

p. 33

comment

855 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.A.015 (d) — Means of compliance (p16-17)
- ANNEX I - Part-AR - ADR.AR.B.005 (d) — Management system (p20)
- ANNEX I - Part-AR - ADR.AR.C.040(f) – Changes (26-27)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.005(d) – Management system (p13-14)
- AMC/GM to ANNEX I – Part-AR – AMC1 -ADR.AR.C.040(f) – Changes (p31-32)
- AMC/GM to ANNEX I – Part-AR – AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33)
- AMC/GM to ANNEX I – Part-AR - GM1-ADR.AR.C.035(a)(3) – Changes (p28)

- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.040(c) – Changes (p33)
- ANNEX II - Part-OR – ADR-OR.B.040(a) – Changes (p41-42)
- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.B.040(a) — Changes (p60-61)

This comment is linked with comment number 1101 in book I.

2. General comment

These paragraphs lead to many formal exchanges that are not always relevant and that considerably increase the administrative burden of:

- both the EASA and the competent authority for ADR.AR.A.015 (d), ADR.AR.B.005 (d) and the corresponding acceptable means of compliance and
- both the aerodrome operator and the competent authority for ADR.AR.C.040(f) and the corresponding acceptable means of compliance.

3. Justification and proposed text / comment

- Paragraph (d) of ADR.AR.A.015

Minor alternative AMC to the ones proposed by EASA may be accepted, due to local special constraints. In order to avoid administrative burden both for the EASA and the competent authority, it is proposed to only notify the "significant" alternative AMC, i.e. the ones which differs notably from the EASA's ones and the ones that will be applied on a national scale. Paragraph (d) of ADR.AR.A.015 requires notification of these alternatives AMC to all other Member States which amplifies considerably the aforementioned administrative burden, in particular for AMC that may not be usable or relevant for other aerodromes.

Paragraph (d) of ADR.AR.A.015 also implies that alternative AMC that could be possibly rejected by EASA will be notified to other Member States, without them knowing of the acceptability the alternative AMC. It is proposed to delete this requirement and let EASA informs all the Member States (for example, through a website) of the AMC that are deemed acceptable.

In order to limit the administrative burden to the most pertinent, DGAC proposes the following modifications of ADR.AR.A.015:

ADR.AR.A.015 — Means of compliance

" [...]

(d) [...] When the competent authority finds that the alternative means of compliance proposed by the aerodrome operator or the provider of apron management services are in accordance with the Implementing Rules, it shall without undue delay:

(1) notify the applicant that the alternative means of compliance may be implemented and, if applicable, amend the approval or certificate of the applicant accordingly;

(2) notify the Agency of their content of the significant ones, including copies of the relevant documentation;

~~*(3) inform other Member States about alternative means of compliance that were accepted.*~~

(e) [...] The competent authority shall provide the Agency with a full description of the significant alternative means of compliance, including any revisions to procedures that may be relevant, as well as an

assessment demonstrating that the Implementing Rules are met. "

- Paragraph (d) of ADR.AR.B.005 and AMC1-ADR.AR.B.005 (d)

The adaptation of the procedures of the competent authority is a living and ongoing processes. In order to avoid administrative burden both for the competent authority and the EASA, DGAC proposes to only notify the most significant amendments of the procedures.

ADR.AR.B.005 – Management system

" [...]

(d) A copy of the procedures related to the management system and their significant amendments shall be made available to the Agency for the purpose of standardisation."

AMC1-ADR.AR.B.005 (d) – Management system

"PROCEDURES AVAILABLE TO THE AGENCY

(a) Copies of the procedures in the competent authority's management system should be made available to the Agency for the purpose of standardisation. These should include any significant amendments to the procedures. The procedures should provide at least the following information:

[...]"

- Paragraph (f) of ADR.AR.C.040 and AMC1-ADR.AR.C.040(f)

The tasks allocated to the competent authority for "changes not requiring prior approval" are as high as for those requiring prior approval which is not pertinent.

Considering the numerous changes notified to the competent authority, this would lead to high workload incompatible with available resources.

Furthermore, since every change would be thoroughly examined by the competent authority and providing no comment would be considered as implied approval, this would remove responsibility for the change from the aerodrome operator to the competent authority.

This is a **critical** point for DGAC that proposes the following changes to deal with it:

ADR.AR.C.040 – Changes

"[...] (f) For changes not requiring prior approval, the competent authority shall assess the information provided in the notification sent by the aerodrome operator in accordance with ADR.OR.B.040 to verify compliance with the Certification Specifications basis issued by the Agency and the applicable requirements, as appropriate. In case of any non-compliance, the competent authority shall:

(1) notify the aerodrome operator about the non-compliance and request further changes; and

(2) in case of level 1 or level 2 findings, act in accordance with Article ADR.AR.C.055.

[...]"

AMC1 -ADR.AR.C.040(f) – Changes – page 31

"CHANGES NOT REQUIRING PRIOR APPROVAL

(a) Upon receiving a notification of a change that does not require a prior approval, the competent authority should:

~~(1) assess the change in relation to is compliant with the certification basis and the applicable requirements of Part ADR.OR, Part ADR.OPS, as well as any other applicable requirements;~~
~~(2) assess if the aerodrome operator has identified all the certification specifications, applicable requirements of Part ADR.OR, Part ADR.OPS, or other applicable requirements which are related to or affected by the change, as well as any cases related to demonstration of an equivalent level of safety;~~
~~(3) assess the actions proposed by the aerodrome operator in order to show compliance with (1) and (2) above;~~
~~(4) review and assess the content of the changes to the aerodrome manual; and;~~
~~(5) evaluate check that the safety assessment that has been submitted by the aerodrome operator, in accordance with AMC1 ADR.AR.C.035(b) and verify its compliance with ADR.OR.B.065 coordinated with third parties, and that it properly identifies risks and mitigation means.~~
[...]"

- AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33) and GM1-ADR.AR.C.035(a)(3) – Changes (p28)

In paragraph (a), the changes in nominated persons should not be transmitted to the competent authority as they are not significant safety related matter. The competency of nominated persons should be assessed by the aerodrome operator within its SMS, and the authority will oversee the SMS functioning is adequate, but not assess directly the competency of aerodrome operator staff. The word "qualification" should be avoided (see comment n°869 on qualifications). It is consequently proposed to delete this paragraph.

In paragraph (c): only significant amendments of the management system documentation should be notified to the competent authority.

It is consequently proposed to modify AMC3 -ADR.AR.C.040(a);(f) – Changes as follows :

AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33)

GENERAL

~~(a) Changes in nominated persons: The competent authority should be informed of any changes to personnel specified in Part ADR.OR that may affect the certificate or the terms of approval attached to it. When an aerodrome operator submits the name of a nominee for the nominated persons mentioned in ADR.OR.D.015, the competent authority should assess his/her qualifications and may interview the nominee or call for additional evidence of his/her suitability before deciding upon his/her acceptability (see GM1 ADR.AR.C.035 (a)(3)).~~

(b) A documented systematic approach should be used for maintaining the information on when an amendment was received by the competent authority and when it was approved.

(c) The competent authority should receive from the aerodrome operator each **significant** management system documentation amendment, including amendments that do not require prior approval by the competent authority. Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should indicate its approval in writing. Where the amendment does not require prior approval, the competent authority should acknowledge receipt in writing within the time limits existing

*under the relevant national legislation.
[...]"*

and delete GM1-ADR.AR.C.035(a)(3) – Changes

GM1-ADR.AR.C.040(c)

It is agreed that any changes to the terms of approval of the certificate should be prior approved by the competent authority. However, this does not systematically lead to the formal change of the certificate itself : for a temporary change the formal process of modifying the certificate might take longer than the changes itself.

It is proposed to modify GM1-ADR.AR.C.040(c) : change "*irrespective of their magnitude*" by "*where appropriate*"

- Paragraph (a) of ADR.OR.B.040 and AMC1-ADR.OR.B.040(a)

Paragraph (a)(3) of ADR.OR.B.040 is not clear on which entity (the competent authority or the aerodrome operator) decides whether a change needs to be approved by the competent authority or not. DGAC proposes modify it to indicate more explicitly that these changes are those that the competent authority finds necessary to be approved:

ADR.OR.B.040 – Changes

*"(a) Any **significant** change affecting:*

(1) the terms of approval of the certificate; or

(2) any of the elements of the operator's management system as required in ADR.OR.D.005 (b)(1), (b)(3), (b)(4), (b)(6) and (b)(7); or

(3) any additional elements notified to the competent authority in accordance with paragraph (c) but ~~found necessary to be approved by the competent authority~~ found necessary by the competent authority to be approved,

shall require prior approval by the competent authority.

[...]"

Paragraph (b) of AMC1-ADR.OR.B.040(a) gives too much details while flexibility is needed and the changes requiring prior approval by the competent authority are already defined in accordance with paragraph (a) and (c) of ADR.OR.B.040. It is essential to delete this paragraph to prevent from useless increased administrative burden between the aerodrome operator and the competent authority.

AMC1-ADR.OR.B.040(a) – Changes

"CHANGES REQUIRING PRIOR APPROVAL

[...]

~~(b) Examples of such changes include, but are not limited to, the following:~~

~~(1) changes to the physical characteristics of a runway; such as:~~

~~(i) new runway(s): a development resulting in the construction of a 'new' runway (e.g. new construction, or the change of an existing grass surface to a paved surface);~~

~~(ii) runway extension or shortening resulting in an amendment to declared distances;~~

~~(iii) threshold relocation (Instrument Status): a development involving~~

~~relocation of the instrument runway threshold, or relocation of a non-instrument runway threshold in preparation for instrument status;~~
~~(iv) changes to runway designation;~~
~~(2) changes of the aerodrome visual aids or other changes to the aerodrome, when such changes are associated with a change (upgrade or downgrade) of the intended operations (e.g. to accommodate low visibility operations and/or night operations);~~
~~(3) changes in the aerodrome operating minima;~~
~~(4) change that affects the obstacle limitation surfaces associated with approved type of approaches;~~
~~(5) change in the level of the rescue and fire-fighting services;~~
~~(6) changes in the organisational structure of the organisation, including responsibilities, and accountabilities;~~
~~(7) changes related to fuel provision."~~

response

Partially accepted

On GM1-ADR.AR.C.040(c): Partially agreed. The terms of approval sheet of appendix I and appendix II have been made into GM. Please have a look at this in the new AMC/ GM material. The terms of approval have become terms of the certificate and a definition of all the elements that need to be mentioned on these terms has been provided. These terms should be updated when the situation at the airport changes. This is not too burdensome in the Agency's view point.

comment

989

comment by: *NATS National Air Traffic Services Limited*

2 comments

1. There are two identically named GM. Suggest rename or merge into single GM.
2. There are "should" in this GM thus implying that they are AMC rather than GM. Suggest rewrite removing "should".

response

Partially accepted

On 1: Agreed. The second GM is now named GM2.

On 2: There is no rule saying that 'should' cannot be used in GM.

comment

991

comment by: *NATS National Air Traffic Services Limited*

There are two identically named GM. Suggest rename or merge into single GM.

response

Accepted

The second GM is now named GM2.

comment	<p>1370 comment by: DGAC Direction Générale de l'aviation civile</p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• AMC/GM to ANNEX I — Part-AR — GM1-ADR-AR.C.040(c) – Changes – Change of name of the aerodrome operator (p33) <p><u>2. Justification and proposed text / comment</u> This GM should be numbered "GM2" instead of "GM1". Moreover, the word "should" should be avoided in GM (as it is guidance material): "may" is proposed as it should not be an obligation to have these names in the aerodrome certificate : this would induce unnecessary Administrative Burden (see comment 1101 in Book I – IR). Proposal:</p> <p>GM12-ADR.AR.C.040 (c) – Changes "CHANGE OF NAME OF THE AERODROME OPERATOR (a) On receipt of the application and proof of change of name as well as the relevant parts of the aerodrome operator's documentation as required by Part-ADR.OR, the competent authority should may re-issue the certificate. (b) [...]"</p>
response	<p>Partially accepted</p> <p>On 1: Agreed. The second GM is now named GM2.</p> <p>On 2: There is no rule saying that 'should' cannot be used in GM.</p>
comment	<p>1663 comment by: DGAC Direction Générale de l'aviation civile</p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• AMC/GM to ANNEX I — Part-AR — GM1-ADR-AR.C.040(c) – Changes – Change of name of the aerodrome operator (p33) <p><u>2. Justification and proposed text / comment</u> This GM should be numbered "GM2" instead of "GM1". Moreover, the word "should" should be avoided in GM (as it is guidance material): "may" is proposed as it should not be an obligation to have these names in the aerodrome certificate : this would induce unnecessary Administrative Burden (see comment 1101 in Book I – IR). Proposal:</p> <p>GM12-ADR.AR.C.040 (c) – Changes "CHANGE OF NAME OF THE AERODROME OPERATOR (a) On receipt of the application and proof of change of name as well as the relevant parts of the aerodrome operator's documentation as required by Part-ADR.OR, the competent authority should may re-issue the certificate. (b) [...]"</p>
response	<p>Partially accepted</p> <p>On 1: Agreed. The second GM is now named GM2.</p>

On 2: There is no rule saying that 'should' cannot be used in GM.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.045(a);(b) – Change of aerodrome operator

p. 33

comment

674

comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR.AR.C.045(a);(b)	Change of aerodrome operator ASSESSMENT OF RISKS ASSOCIATED WITH THE CHANGE OF THE OPERATOR
Proposition/commentaire	L'AESA estime que tout se règle par le biais d'arrangements entre l'exploitant en place et le futur exploitant, ce qui est une vision utopique. Ce point est à mettre en rapport avec la possibilité de pouvoir avoir un certificat à durée limitée permettant de gérer les changements d'exploitant. (cf. 9ieme commentaire général ref n°2892 du (B.I) et commentaire n°1118 sur NPA 2011-20 (B.I) ADR.AR.C.035 (g))
Justification	
Traduction de courtoisie	The EASA reckons that every change of operator is settled through arrangements between the current ant the proposed operator, which is an utopian view. This point is to link with the possibility to have a short-term certificate allowing to manage the change of operator (cf. 9th général comment ref n°2892 on (B.I) and comment n°1118 on NPA 2011-20 (B.I) ADR.AR.C.035 (g))

response

Noted

EASA certificates have a continuous validity (see ADR.OR.B.035 now called Continued validity of a certificate). There, it is stipulated that the certificate remains valid subject to certain conditions being met.

The rule on change of aerodrome operator was abolished. There is now only Guidance Material on that subject under the AMC/GM on the rule ADR.AR.C.040.

comment

780

comment by: *Union des Aéroports français - UAF*

	<p>Attachment #46</p> <p>UAF NPA 2011-20 (B.II) AMC1-ADR.AR.C.045(a);(b)</p> <p>Référence: AMC1-ADR.AR.C.045(a);(b) Change of aerodrome operator ASSESSMENT OF RISKS ASSOCIATED WITH THE CHANGE OF THE OPERATOR</p> <p>Traduction de courtoisie The EASA reckons that every change of operator is settled through arrangements between the current ant the proposed operator, which is an utopian view. This point is to link with the possibility to have a short-term certificate allowing to manage the change of operator (cf. commentaire général n°9 and commentaire UAF NPA 2011-20 (B.I) ADR.AR.C.035 (g))</p>
response	<p>Noted</p> <p>EASA certificates have a continuous validity (see ADR.OR.B.035 now called Continued validity of a certificate). There, it is stipulated that the certificate remains valid subject to certain conditions being met.</p> <p>The rule on change of aerodrome operator was abolished. There is now only Guidance Material on that subject under the AMC/GM on the rule ADR.AR.C.040.</p>
comment	<p>996 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>The AMC refers to "AMC1-ADR.C.035(b)" which does not exist.</p>
response	<p>Accepted</p> <p>Correct reference is AMC1-ADR.AR.C.035 (a);(b);(c). That number was also changed. It used to be AMC1-ADR.AR.C.035 (a)(2).</p>
comment	<p>1301 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #47</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.AR.C.045(a);(b)</p> <p>Référence: AMC1-ADR.AR.C.045(a);(b) Change of aerodrome operator ASSESSMENT OF RISKS ASSOCIATED WITH THE CHANGE OF THE OPERATOR</p> <p>Traduction de courtoisie The EASA reckons that every change of operator is settled through arrangements between the current ant the proposed operator, which is an utopian view. This point is to link with the possibility to have a short-term certificate allowing to manage the change of operator (cf. commentaire général n°9 and commentaire UAF NPA 2011-20 (B.I) ADR.AR.C.035 (g))</p>
response	<p>Noted</p>

EASA certificates have a continuous validity (see ADR.OR.B.035 now called Continued validity of a certificate). There, it is stipulated that the certificate remains valid subject to certain conditions being met.

The rule on change of aerodrome operator was abolished. There is now only Guidance Material on that subject under the AMC/GM on the rule ADR.AR.C.040.

comment

1672

comment by: *Aéroport de Marseille - MRS/LFML*

The EASA reckons that every change of operator is settled through arrangements between the current and the proposed operator, which is an utopian view.

This point is to link with the possibility to have a short-term certificate allowing to manage the change of operator (cf. commentaire général n°9 and commentaire UAF NPA 2011-20 (B.I) ADR.AR.C.035 (g))

response

Noted

EASA certificates have a continuous validity (see ADR.OR.B.035 now called Continued validity of a certificate). There, it is stipulated that the certificate remains valid subject to certain conditions being met.

The rule on change of aerodrome operator was abolished. There is now only Guidance Material on that subject under the AMC/GM on the rule ADR.AR.C.040.

comment

1823

comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#48](#)

ADBAM - NPA 2011-20 (B.II) AMC1-ADR.AR.C.045(a);(b)

Référence: AMC1-ADR.AR.C.045(a);(b)

Change of aerodrome operator

ASSESSMENT OF RISKS ASSOCIATED WITH THE CHANGE OF THE OPERATOR

Traduction de courtoisie

The EASA reckons that every change of operator is settled through arrangements between the current and the proposed operator, which is an utopian view.

This point is to link with the possibility to have a short-term certificate allowing to manage the change of operator (cf. commentaire général n°9 and commentaire ADBM NPA 2011-20 (B.I) ADR.AR.C.035 (g))

response

Noted

EASA certificates have a continuous validity (see ADR.OR.B.035 now called Continued validity of a certificate). There, it is stipulated that the certificate remains valid subject to certain conditions being met.

The rule on change of aerodrome operator was abolished. There is now only Guidance Material on that subject under the AMC/GM on the rule

ADR.AR.C.040.

comment 1957 comment by: *Pau Pyrénées Airport - PUF/LFBP*

The EASA reckons that every change of operator is settled through arrangements between the current ant the proposed operator, which is an utopian view.
This point is to link with the possibility to have a short-term certificate allowing to manage the change of operator (cf. commentaire général n°9 and commentaire NPA 2011-20 (B.I) ADR.AR.C.035 (g))

response Noted

EASA certificates have a continuous validity (see ADR.OR.B.035 now called Continued validity of a certificate). There, it is stipulated that the certificate remains valid subject to certain conditions being met.

The rule on change of aerodrome operator was abolished. There is now only Guidance Material on that subject under the AMC/GM on the rule ADR.AR.C.040.

comment 1973 comment by: *Pau Pyrénées Airport - PUF/LFBP*

The EASA reckons that every change of operator is settled through arrangements between the current ant the proposed operator, which is an utopian view and sometimes impossible.
This point is to link with the possibility to have a short-term certificate allowing to manage the change of operator (cf. commentaire général n°9 and commentaire NPA 2011-20 (B.I) ADR.AR.C.035 (g))

response Noted

EASA certificates have a continuous validity (see ADR.OR.B.035 now called Continued validity of a certificate). There, it is stipulated that the certificate remains valid subject to certain conditions being met.

The rule on change of aerodrome operator was abolished. There is now only Guidance Material on that subject under the AMC/GM on the rule ADR.AR.C.040.

comment 2303 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC1-ADR.AR.C.045(a);(b)	Change of aerodrome operator ASSESSMENT OF RISKS ASSOCIATED WITH THE CHANGE OF THE OPERATOR
Proposition/commentaire	L'AESA estime que tout se règle par le biais d'arrangements entre l'exploitant en place et le futur exploitant, ce qui est une vision utopique. Ce point est à mettre en rapport avec la possibilité de pouvoir avoir un certificat à durée limitée permettant de gérer les changements d'exploitant. (cf. commentaire général n° 9 et

	commentaire NPA 2011-20 (B.I) ADR.AR.C.035 (g))
Justification	
Traduction de courtoisie	The EASA reckons that every change of operator is settled through arrangements between the current and the proposed operator, which is an utopian view. This point is to link with the possibility to have a short-term certificate allowing to manage the change of operator (cf. commentaire général n° 9 and commentaire NPA 2011-20 (B.I) ADR.AR.C.035 (g))
response	<p>Noted</p> <p>EASA certificates have a continuous validity (see ADR.OR.B.035 now called Continued validity of a certificate). There, it is stipulated that the certificate remains valid subject to certain conditions being met.</p> <p>The rule on change of aerodrome operator was abolished. There is now only Guidance Material on that subject under the AMC/GM on the rule ADR.AR.C.040.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.055 – Findings, observations corrective actions and enforcement measures</p>	p. 34
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comment	<p>1172 comment by: <i>Federal Office of Civil Aviation FOCA</i></p> <p>AMC1.ADR.AR.C.055:EASA should not interfere with the legal framework of the Member States. NPA should concentrate on safety aspects only. FOCA suggests to remove provision.</p>
response	<p>Partially accepted</p> <p>This AMC only repeats Article 68 of the Basic Regulation that sets an obligation on the Member State to lay down penalties. This AMC can be made GM though, and it can be made explicit that financial penalties are enforcement measures:</p> <p>GMC1-ADR.AR.C.055 – Findings, observations corrective actions and enforcement measures ENFORCEMENT MEASURES - FINANCIAL PENALTIES</p> <p>The competent authority may additionally, and depending on the nature and the repetitiveness of the findings, or the level of implementation of the corrective actions, impose financial penalties as appropriate, which are effective, proportionate, and dissuasive.</p>
comment	<p>1237 comment by: <i>UK CAA</i></p>

Page No: 34

Paragraph No: AMC1-ADR.AR.C.055

Comment: It is not appropriate for the Agency to establish an AMC on the question of what sort of enforcement provisions the competent authority of a Member State may impose.

Justification: Article 68 of the Basic Regulation sets an obligation on the Member State to lay down penalties. The nature of those penalties and who should implement them is a matter strictly for the Member State to decide.

Proposed Text: Delete this AMC.

response

Partially accepted

This AMC only repeats Article 68 of the Basic Regulation that sets an obligation on the Member State to lay down penalties. This AMC can be made GM though, and it can be made explicit that financial penalties are enforcement measures:

GMC1-ADR.AR.C.055 – Findings, observations corrective actions and enforcement measures

ENFORCEMENT MEASURES - FINANCIAL PENALTIES

The competent authority may additionally, and depending on the nature and the repetitiveness of the findings, or the level of implementation of the corrective actions, impose financial penalties as appropriate, which are effective, proportionate, and dissuasive.

comment

1285

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR - AMC1.ADR.AR.C.055 — Findings, observations, corrective actions and enforcement - FINANCIAL PENALTIES (page 34)

2. Justification and proposed text / comment

This comment is **critical**.

According to Article 68 of the basic regulation (216-2008) on Penalties, "Member States shall lay down penalties for infringement of this Regulation and its implementing rules. The penalties shall be effective, proportionate and dissuasive."

The basic regulation states that financial penalties are the competency of the Member States and not the competent authority. However, AMC1.ADR.AR.C.055 has no clear hook in ADR.AR.C.055, and the IR ADR.AR.C.055 applies to the competent authority and not to the Member State.

It is consequently proposed to delete this AMC, which is not consistent with the content of the Basic Regulation and has no clear hook in ADR.AR.C.055.

response

Partially accepted

This AMC only repeats Article 68 of the Basic Regulation that sets an obligation on the Member State to lay down penalties. This AMC can be made GM though, and it can be made explicit that financial penalties are enforcement measures. And, thus, the legal 'hook' would be given.

GMC1-ADR.AR.C.055 – Findings, observations corrective actions and enforcement measures

ENFORCEMENT MEASURES - FINANCIAL PENALTIES

The competent authority may additionally, and depending on the nature and the repetitiveness of the findings, or the level of implementation of the corrective actions, impose financial penalties as appropriate, which are effective, proportionate, and dissuasive.

comment 2268 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
Delete. This is a legal aspect regulated by the States. NPA should only deal with safety aspects.

response Partially accepted
This AMC only repeats Article 68 of the Basic Regulation that sets an obligation on the Member State to lay down penalties. This AMC can be made GM though, and it can be made explicit that financial penalties are enforcement measures:
GMC1-ADR.AR.C.055 – Findings, observations corrective actions and enforcement measures
ENFORCEMENT MEASURES - FINANCIAL PENALTIES
The competent authority may additionally, and depending on the nature and the repetitiveness of the findings, or the level of implementation of the corrective actions, impose financial penalties as appropriate, which are effective, proportionate, and dissuasive.

comment 2352 comment by: *BMVBS - Federal Ministry of Transport, Building and Urban Development*
Delete this AMC as it is neither consistent with the BR nor has a legal hook to ADR.AR.C.055. According to the BR financial penalties are a competence of Member States, whereas IR ADR.AR.C.055 applies to the competent authority.

response *Partially accepted*
This AMC only repeats Article 68 of the Basic Regulation that sets an obligation on the Member State to lay down penalties. This AMC can be made GM though, and it can be made explicit that financial penalties are enforcement measures:
GMC1-ADR.AR.C.055 – Findings, observations corrective actions and enforcement measures
ENFORCEMENT MEASURES - FINANCIAL PENALTIES
The competent authority may additionally, and depending on the nature and the repetitiveness of the findings, or the level of implementation of the corrective actions, impose financial penalties as appropriate, which are effective, proportionate, and dissuasive.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM1-ADR.AR.C.055 – Findings, observations corrective actions and enforcement measures p. 34

comment 589 comment by: *Exeter International Airport*
AMC1-ADR.AR.C.055 - Further details should be supplied of when financial penalties may be imposed and how they will be limited.

response Not accepted
This is up to the Member States to develop.

comment 1000 comment by: *NATS National Air Traffic Services Limited*
2 comments

1. There are two identically named GM. Suggest rename or merge into single GM.

2. This implies cessation of service for a period of time. How realistic is this for major air transport hubs?

response Noted

1. GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.

2. Please be aware that these rules cover a wide range of airports from small and medium to large.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM1-ADR.AR.C.055 – Findings, corrective actions and enforcement measures p. 34

comment 824 comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- A. Explanatory Note - EXECUTIVE SUMMARY (p2)
- A. Explanatory Note - II. Process and scope (p5,6): note 1
- A. Explanatory Note - III. Overview of the rules proposed in this NPA - Certification process including the establishment of the certification basis (CB) (p9): (23) (24)
- Draft Commission Regulation (p2-5): §11
- ANNEX II - Part-OR - ADR.OR.D.035 – Record keeping (p55)
- AMC/GM to ANNEX I – Part-AR – GM1-ADR.AR.C.055 – Findings, corrective actions and enforcement measures (p34)
- AMC/GM to ANNEX II – Part-OR – AMC1-ADR.OR.E.005 –

- Aerodrome manual (p109)
- AMC/GM to ANNEX II — Part-OR — AMC2-ADR.OR.E.005 — Aerodrome manual (p109-114)

2. Justification and proposed text / comment

This comment is linked with comment 24 in Explanatory Note and 1078 in book II.

As indicated in the explanatory note (pages 2, 5, 6 and 9), requirements for the certification of aerodrome equipment, as well as for the oversight of designers and producers of safety-critical aerodrome equipment will follow at a later stage jointly with the work to be done for specific ATM systems and constituents. This work will probably help knowing which equipment is ATM and which is aerodrome, knowing that most of it is ATM equipment.

Therefore, the aerodrome equipment should not be part of the aerodrome manual since lots of it is air traffic management equipment. Moreover, the pertinence of having a manual for aerodrome equipment in charge of the aerodrome operator is not proved and merits further debates.

Consequently:

- the first bullet of **GM1-ADR.AR.C.055 is to be deleted**
- Paragraph 4.3 of Part C of the content of the aerodrome manual of the proposed GM1-ADR.OR.E.010 — *Structure of the aerodrome manual* is to be deleted, all the more that outside the boundaries of the aerodrome, the aerodrome operator is no more competent;
- Paragraph 13 of Part E of the content of the aerodrome manual of the proposed GM1-ADR.OR.E.010 — *Structure of the aerodrome manual* is to be deleted

"ADR.OR.D.035 – Record-keeping

[...]

(d) [...]

~~(3) manuals of aerodrome equipment or systems employed at the aerodrome, for as long as they are used at the aerodrome~~

[...]"

GM1-ADR.AR.C.055 – Findings, corrective actions and enforcement measures

"CATEGORIES OF FINDINGS — DOCUMENTARY EVIDENCE

Examples of documentary evidence include but is not limited to:

~~— aerodrome or equipment manuals;~~

[...]"

AMC2-GM1-ADR.OR.E.00510 — Structure of the aAerodrome manual

"[...]

C. PART C — PARTICULARS OF THE AERODROME SITE

[...]

~~4.3 a plan showing the location of any aerodrome facilities and equipment outside the boundaries of the aerodrome;~~

[...]

~~E. PART D E — PARTICULARS OF THE AERODROME OPERATING PROCEDURES AND SAFETY MEASURES OPERATING PROCEDURES OF THE AERODROME, ITS EQUIPMENT AND SAFETY MEASURES~~

[...]

	<p>13. Maintenance and repair instructions, servicing information, troubleshooting and inspection procedures of aerodrome equipment [...]"</p>
response	<p>Not accepted</p> <p>The Agency believes that the manuals of aerodrome equipment are part of the physical characteristics of the aerodrome and should be, therefore, kept as part of the evidence supporting the compliance of the aerodrome with the CS. They underlie the CB. No equipment can be properly operated and maintained without its handbook. It is utopian to think otherwise.</p>
comment	<p>1002 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>There are two identically named GM. Suggest rename or merge into single GM</p>
response	<p>Not accepted</p> <p>AMCs (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.</p>
comment	<p>2112 comment by: <i>AENA - Aeropuertos Españoles y Navegación Aérea</i></p> <p>As indicated in the explanatory note (pages 2, 5, 6 and 9), requirements for the certification of aerodrome equipment, as well as for the oversight of designers and producers of safety-critical aerodrome equipment will follow at a later stage jointly with the work to be done for specific ATM systems and constituents. This work will probably help knowing which equipment is ATM and which is aerodrome, knowing that most of it is ATM equipment.</p> <p>Therefore, the aerodrome equipment should not be part of the aerodrome manual since lots of it is air traffic management equipment. Moreover, the pertinence of having a manual for aerodrome equipment in charge of the aerodrome operator is not proved and merits further debates.</p> <p>Consequently:</p> <ul style="list-style-type: none"> - the first bullet of GM1-ADR.AR.C.055 is to be deleted - Paragraph 4.3 of Part C of the content of the aerodrome manual of the proposed GM1-ADR.OR.E.010 — <i>Structure of the aerodrome manual</i> is to be deleted, all the more that outside the boundaries of the aerodrome, the aerodrome operator is no more competent; - Paragraph 13 of Part E of the content of the aerodrome manual of the proposed GM1-ADR.OR.E.010 — <i>Structure of the aerodrome manual</i> is to be deleted <p>GM1-ADR.AR.C.055 — Findings, corrective actions and enforcement measures <i>"CATEGORIES OF FINDINGS — DOCUMENTARY EVIDENCE</i> <i>Examples of documentary evidence include but is not limited to:</i> <i>— aerodrome or equipment manuals;</i> <i>[...]"</i></p>
response	<p>Noted</p> <p>With regard to the comment on the 'aerodrome equipment', the Agency</p>

considers that the relevant paragraphs of the GM are in line with the relevant essential requirements of Annex Va ((A(3)(f), B(1)(h)), and paragraph 1.4.4 of Annex 14 ('aerodrome manual which will contain all pertinent information on the aerodrome site, (...) equipment') because there is also other aerodrome equipment such RFFS vehicles, CFME, which are not related to ATM.

comment 2366 comment by: *CANSO Civil Air Navigation Services Organization*
 There are two identically named GM.
 This implies cessation of service for a period of time. How realistic is this for major air transport hubs?
 Proposed solution - Rename or merge into a single GM

response Not accepted
 The Agency believes that the manuals of aerodrome equipment are part of the physical characteristics of the aerodrome and should be therefore kept as part of the evidence supporting the compliance of the aerodrome with the CS. They underlie the CB. No equipment can be properly operated and maintained without its handbook. It is utopian to think otherwise.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.060 (a) – Wildlife hazard management p. 34-36

comment 45 comment by: *Airtrace*
 Position (25) of the wildlife strike reporting form indicates to which address should bird carcasses be sent. However, all species involved in collision should be precisely determined, not only birds but mammals or any other animal.
 Data about wildlife strikes represent the information upon which wildlife hazard prevention is based. Knowledge about all species involved in collision is necessary to implement efficient measures.

response Noted
 Article will be removed.

comment 46 comment by: *Airtrace*
 Position (25) of the wildlife strike reporting form indicates to which address should bird carcasses be sent. Birds can however carry various viruses, including "bird flu" H5N1. Other techniques can be used to identify species, such as sending pictures or feathers or fur samples.
 Human health issues are involved with sending whole bird carcasses.

response Noted
 Article will be removed.

comment	<p>47 comment by: <i>Airtrace</i></p> <p>When only a few feathers or fur hair are found on an aircraft, methods can be used to identify the species involved in the collision. A number of specialists are well-known in this field, Airtrace being one of them. Data about wildlife strikes represent the information upon which wildlife hazard prevention is based. Knowledge about all species involved in collision is necessary to implement efficient measures.</p>
response	<p>Noted</p>
comment	<p>116 comment by: <i>Zürich Airport</i></p> <p>change (b) from; The competent authority should ensure that the reporting forms (paper or electronic format) used by the aerodrome operators or other parties for reporting wildlife strikes, contain at least the following information:</p> <p>to; The competent authority should ensure that the reporting forms (paper or electronic format) used by the aerodrome operators or other parties for reporting wildlife strikes, contain as much information as possible: e.g. as follow</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>123 comment by: <i>CAA-NL</i></p> <p>We suggest to delete (or near-misses). In the Netherlands there is no reporting of near-misses of wildlife strikes.</p>
response	<p>Accepted</p>
comment	<p>872 comment by: <i>German Birdstrike Committee</i></p> <p>The reporting form asks for a lot of information an airport operator does normally not know. This form is suitable for pilots but not for aerodrome staff.</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>1046 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>From this AMC until AMC2-ADR-AR.C.065(b) there is multiple use of the same identifier and multiple AMC to the same IR. Similarly there is multiple GM to the same IR. We would strongly suggest renaming or merging into a single AMC and/or GM.</p>
response	<p>Noted</p>

GM (Guidance Material) or AMC (Acceptable means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.
Articles will be removed.

comment

1286

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(a) — Wildlife hazard management - REPORTING FORM (page 34 to 37)
- AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(b) — Wildlife hazard management - MITIGATING MEASURES (page 37)
- AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(b) — Wildlife hazard management - PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES - BIRD HAZARD (page 37)

2. Justification and proposed text / comment

AMC1-ADR.AR.C.060(a) — Wildlife hazard management - REPORTING FORM

The list of information to be included in the form in paragraph (b) of AMC1-ADR.AR.C.060(a) is not exactly the same as in the French regulation (Arrêté du 10 Avril 2007). The AMC includes "Parked" as phase of flight but not "holdings" or "unknown".

This is not a specification from ICAO Annex 14, which gives flexibility to States to defined their reporting system, which is already in place (Annex 14 paragraph 9.4.1 states that : "The wildlife strike hazard on, or in the vicinity of, an aerodrome shall be assessed through:

a) the establishment of a national procedure for recording and reporting wildlife strikes to aircraft; [...]"). To avoid to change an existing system which works well, and to avoid costly changes and added workload, it is proposed to keep paragraph (a) in this AMC (which is in line with ICAO Annex 14) and move paragraph (b) of AMC1-ADR.AR.C.060(a) in GM:

"AMC1-ADR.AR.C.060(a)- Wildlife hazard management - REPORTING FORM MECHANISM

(a) *The competent authority should establish a mechanism for the collection and analysis of wildlife strike (or near-misses) reports. It should also forward the wildlife strike reports to the ICAO to be included in the ICAO Bird Strike Information System (IBIS) database.*

(b) *The competent authority should ensure that the reporting forms (paper or electronic format) used by the aerodrome operators or other parties for reporting wildlife strikes, contain adequate ~~at least the following information~~.*

- (1) Operator involved*
- (2) Aircraft make/model*
- (3) Engine make/model*
- (4) Aircraft registration*
- (5) Date, (day, month-year)*
- (6) Local time*
- (7) Dawn, day, dusk, night*
- (8) Aerodrome name*
- (9) Runway used*

- ~~(10) Location if en-route~~
- ~~(11) Height AGL in ft~~
- ~~(12) Speed (IAS) in kt~~
- ~~(13) Phase of flight:~~
 - ~~(i) Parked;~~
 - ~~(ii) Taxi;~~
 - ~~(iii) Take-off run;~~
 - ~~(iv) Climb;~~
 - ~~(v) En route;~~
 - ~~(vi) Descent;~~
 - ~~(vii) Approach;~~
 - ~~(viii) Landing roll;~~
 - ~~(ix) Holding~~
 - ~~(x) Unknown~~
- ~~(14) Part(s) of aircraft struck or damaged:~~
 - ~~(i) Radome;~~
 - ~~(ii) Windshield;~~
 - ~~(iii) Nose (excluding above);~~
 - ~~(iv) Engine no (1, 2, 3, 4);~~
 - ~~(v) Propeller;~~
 - ~~(vi) Wing/rotor;~~
 - ~~(vii) Fuselage;~~
 - ~~(viii) Landing gear;~~
 - ~~(ix) Tail;~~
 - ~~(x) Lights;~~
 - ~~(xi) Other (to be specified)~~
- ~~(15) Effect on flight:~~
 - ~~(i) None;~~
 - ~~(ii) Aborted take-off;~~
 - ~~(iii) Precautionary landing;~~
 - ~~(iv) Engines shut down;~~
 - ~~(v) Other (to be specified)~~
- ~~(16) Sky condition:~~
 - ~~(i) No cloud;~~
 - ~~(ii) Some cloud;~~
 - ~~(iii) Overcast~~
- ~~(17) Precipitation:~~
 - ~~(i) Fog;~~
 - ~~(ii) Rain;~~
 - ~~(iii) Snow~~
- ~~(18) Bird species~~
- ~~(19) Number of birds:~~
 - ~~(i) Seen~~
 - ~~(A) 1~~
 - ~~(B) 2-10~~
 - ~~(C) 11-100~~
 - ~~(D) More~~
 - ~~(ii) Struck~~
 - ~~(A) 1~~
 - ~~(B) 2-10~~
 - ~~(C) 11-100~~
 - ~~(D) more~~
- ~~(20) Size of bird:~~
 - ~~(i) Small~~
 - ~~(ii) Medium~~
 - ~~(iii) Large~~

- ~~(21) Pilot warned of birds:
(i) (A) yes/no
(22) Remarks (description of damage, injuries and other pertinent information)
(23) Reporting person/organisation
(24) Address and/or instructions for returning the form to the competent authority
(25) Address within the member State to which any bird remains, including feather fragments, should be sent."~~

and Add

GM2-ADR.AR.C.060 (a) - Wildlife hazard management - REPORTING FORM

(a) The information contained in the reporting forms used by the aerodrome operator is consistent with what is needed in IBIS database.

(b) The following information is useful:

- (1) Operator involved
- (2) Aircraft make/model
- (3) Engine make/model
- (4) Aircraft registration
- (5) Date, (day, month year)
- (6) Local time
- (7) Dawn, day, dusk, night
- (8) Aerodrome name
- (9) Runway used
- (10) Location if en route
- (11) Height AGL in ft
- (12) Speed (IAS) in kt
- (13) Phase of flight:
 - (i) Parked;
 - (ii) Taxi;
 - (iii) Take off run;
 - (iv) Climb;
 - (v) En route;
 - (vi) Descent;
 - (vii) Approach;
 - (viii) Landing roll;
- (14) Part(s) of aircraft struck or damaged:
 - (i) Radome;
 - (ii) Windshield;
 - (iii) Nose (excluding above);
 - (iv) Engine no (1, 2, 3, 4);
 - (v) Propeller;
 - (vi) Wing/rotor;
 - (vii) Fuselage;
 - (viii) Landing gear;
 - (ix) Tail;
 - (x) Lights;
 - (xi) Other (to be specified)
- (15) Effect on flight:
 - (i) None;
 - (ii) Aborted take-off;
 - (iii) Precautionary landing;
 - (iv) Engines shut down;
 - (v) Other (to be specified)
- (16) Sky condition:

- (i) No cloud;
- (ii) Some cloud;
- (iii) Overcast
- (17) Precipitation:
 - (i) Fog;
 - (ii) Rain;
 - (iii) Snow
- (18) Bird species
- (19) Number of birds:
 - (i) Seen
 - (A) 1
 - (B) 2-10
 - (C) 11-100
 - (D) More
 - (ii) Struck
 - (A) 1
 - (B) 2-10
 - (C) 11-100
 - (D) more
- (20) Size of bird:
 - (i) Small
 - (ii) Medium
 - (iii) Large
- (21) Pilot warned of birds:
 - (i) (A) yes/no
- (22) Remarks (description of damage, injuries and other pertinent information)
- (23) Reporting person/organisation
- (24) Address and/or instructions for returning the form to the competent authority
- (25) Address within the member State to which any bird remains, including feather fragments, should be sent."

AMC1-ADR.AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES

The AMC1 includes the possibility that the hazard source cannot be eliminated which the IR does not consider. The AMC1 requires that all necessary measures are implemented which is contradictory with reducing the risk to as low as reasonably practicable.

Moreover, the word wildlife is not appropriate, as animals can be danger even if not "wild" : it is proposed to replace "wildlife" by "animals".

European rules are using the word "surroundings" instead of "vicinity". (See Reg 216-2008 – Chapter 1 article 1 & article 8A and Annex Va, C.2 (e)). See comment on article 10 of the cover regulation on this point.

Another comment is linked with the one on competent authorities which is critical : the representative from the State in regions ("préfet") who has in charge the land use planning, can not be a competent authority (not possible to implement a management system).

Hence the proposed texts:

"AMC1-ADR.AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES

Where the elimination of existing sites that may attract ~~wildlife~~ animals

the aerodrome (or its vicinity surroundings) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and the competent authorities and other authorities of the Member State should ensure that mitigating all-necessary measures are identified and implemented so that the risk is reduced to a an acceptable level which is as low as reasonably practicable."

Concerning AMC1-ADR.AR.C.060(b) – Wildlife hazard management – PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES – BIRD HAZARD :

This AMC details a non-exhaustive list and is surprising on some points (for instance "theatre").

This AMC should be degraded as GM with a "may" instead of a "should".

This AMC is in fact AMC2 (mistake in the number).

Consequently, it is proposed to write it as follows:

"AMC1GM3-ADR.AR.C.060(b) – Wildlife hazard management – PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES – BIRD HAZARD

The following is a non-exhaustive list of types of land uses which should may in particular be prevented, eliminated or mitigated:

- (a) fish processing;
- (b) agriculture;
- (c) cattle feed lots;
- (d) garbage dumps and landfill sites;
- (e) factory roofs and parking lots;
- (f) theatres and food outlets;
- (g) wildlife refuges;
- (h) artificial and natural lakes;
- (i) golf or polo-courses, etc;
- (j) animal farms; and
- (k) slaughter-houses."

response

Noted

With regard to AMC1-ADR.AR.C.060(a), article will be removed.

comment

1310

comment by: East Midlands Airport - EMA/EGNX

(b) Reporting form. Requirement is for the form to contain information detailed in points 1 -25, however if the aircraft registration is entered (point 4), then there should be no need for engine type, make/model etc to also be included as such information is already available on the aircraft registration database, which should be linked to this form.

response

Noted

Article will be removed.

comment

1311

comment by: East Midlands Airport - EMA/EGNX

(b) Reporting Form. Point 19 details the information required on number of birds (i) seen and (ii) struck. Would strongly suggest a box for an actual number (or estimated number) for both (i) and (ii) as there is a huge difference between 11 and 100 birds. These tick boxes are legacies of the

	old push to produce machine-readable forms.
response	Noted Article will be removed.
comment	1333 comment by: <i>East Midlands Airport - EMA/EGNX</i> (b) Reporting Form. Point 20 - Size of bird (i) small, (ii) medium and (iii) large. These definitions are meaningless unless guidelines are given. If species name is available weight can be entered with some precision by linked table of bird weight vs species
response	Noted Article will be removed.
comment	1336 comment by: <i>East Midlands Airport - EMA/EGNX</i> (b) Reporting Form. Point 21 - Pilot warned of birds. By what method ATC, ATIS, NOTAM ? Of little or no value unless via ATC
response	Noted Article will be removed.
comment	2058 comment by: <i>AENA - Aeropuertos Españoles y Navegación Aérea</i> The list of information to be included in the form in paragraph (b) of AMC1-ADR.AR.C.060(a) is not exactly the same as in some States. The AMC includes "Parked" as phase of flight but not "holdings" or "unknown". This is not a specification from ICAO Annex 14, which gives flexibility to States to defined their reporting system, which is already is place (Annex 14 paragraph 9.4.1 states that : "The wildlife strike hazard on, or in the vicinity of, an aerodrome shall be assessed through: a) the establishment of a <u>national procedure for recording and reporting wildlife strikes to aircraft; [...]"</u>). To avoid to change an existing system which works well, and to avoid costly changes and added workload, it is proposed to keep paragraph (a) in this AMC (which is in line with ICAO Annex 14) and move paragraph (b) of AMC1-ADR.AR.C.060(a) in GM: "AMC1-ADR.AR.C.060(a)- Wildlife hazard management - REPORTING FORM MECHANISM <i>(a) The competent authority should establish a mechanism for the collection and analysis of wildlife strike (or near-misses) reports. It should also forward the wildlife strike reports to the ICAO to be included in the ICAO Bird Strike Information System (IBIS) database.</i> <i>(b) The competent authority should ensure that the reporting forms (paper or electronic format) used by the aerodrome operators or other parties for reporting wildlife strikes, contain <u>adequate</u> at least the following information:-</i> <i>(1) Operator involved</i> <i>(2) Aircraft make/model</i> <i>(3) Engine make/model</i> <i>(4) Aircraft registration</i>

- ~~(5) Date, (day, month year)~~
- ~~(6) Local time~~
- ~~(7) Dawn, day, dusk, night~~
- ~~(8) Aerodrome name~~
- ~~(9) Runway used~~
- ~~(10) Location if en-route~~
- ~~(11) Height AGL in ft~~
- ~~(12) Speed (IAS) in kt~~
- ~~(13) Phase of flight:~~
 - ~~(i) Parked;~~
 - ~~(ii) Taxi;~~
 - ~~(iii) Take-off run;~~
 - ~~(iv) Climb;~~
 - ~~(v) En route;~~
 - ~~(vi) Descent;~~
 - ~~(vii) Approach;~~
 - ~~(viii) Landing roll;~~
 - ~~(ix) Holding~~
 - ~~(x) Unknown~~
- ~~(14) Part(s) of aircraft struck or damaged:~~
 - ~~(i) Radome;~~
 - ~~(ii) Windshield;~~
 - ~~(iii) Nose (excluding above);~~
 - ~~(iv) Engine no (1, 2, 3, 4);~~
 - ~~(v) Propeller;~~
 - ~~(vi) Wing/rotor;~~
 - ~~(vii) Fuselage;~~
 - ~~(viii) Landing gear;~~
 - ~~(ix) Tail;~~
 - ~~(x) Lights;~~
 - ~~(xi) Other (to be specified)~~
- ~~(15) Effect on flight:~~
 - ~~(i) None;~~
 - ~~(ii) Aborted take-off;~~
 - ~~(iii) Precautionary landing;~~
 - ~~(iv) Engines shut down;~~
 - ~~(v) Other (to be specified)~~
- ~~(16) Sky condition:~~
 - ~~(i) No cloud;~~
 - ~~(ii) Some cloud;~~
 - ~~(iii) Overcast~~
- ~~(17) Precipitation:~~
 - ~~(i) Fog;~~
 - ~~(ii) Rain;~~
 - ~~(iii) Snow~~
- ~~(18) Bird species~~
- ~~(19) Number of birds:~~
 - ~~(i) Seen~~
 - ~~(A) 1~~
 - ~~(B) 2-10~~
 - ~~(C) 11-100~~
 - ~~(D) More~~
 - ~~(ii) Struck~~
 - ~~(A) 1~~
 - ~~(B) 2-10~~
 - ~~(C) 11-100~~

- ~~(D) more~~
~~(20) Size of bird:~~
~~(i) Small~~
~~(ii) Medium~~
~~(iii) Large~~
~~(21) Pilot warned of birds:~~
~~(i) (A) yes/no~~
~~(22) Remarks (description of damage, injuries and other pertinent information)~~
~~(23) Reporting person/organisation~~
~~(24) Address and/or instructions for returning the form to the competent authority~~
~~(25) Address within the member State to which any bird remains, including feather fragments, should be sent."~~

and Add

GM2-ADR.AR.C.060 (a) - Wildlife hazard management - REPORTING FORM

- (a) The information contained in the reporting forms used by the aerodrome operator is consistent with what is needed in IBIS database.
- (b) The following information is useful:
- (1) Operator involved
 - (2) Aircraft make/model
 - (3) Engine make/model
 - (4) Aircraft registration
 - (5) Date, (day, month year)
 - (6) Local time
 - (7) Dawn, day, dusk, night
 - (8) Aerodrome name
 - (9) Runway used
 - (10) Location if en route
 - (11) Height AGL in ft
 - (12) Speed (IAS) in kt
 - (13) Phase of flight:
 - (i) Parked;
 - (ii) Taxi;
 - (iii) Take off run;
 - (iv) Climb;
 - (v) En route;
 - (vi) Descent;
 - (vii) Approach;
 - (viii) Landing roll;
 - (14) Part(s) of aircraft struck or damaged:
 - (i) Radome;
 - (ii) Windshield;
 - (iii) Nose (excluding above);
 - (iv) Engine no (1, 2, 3, 4);
 - (v) Propeller;
 - (vi) Wing/rotor;
 - (vii) Fuselage;
 - (viii) Landing gear;
 - (ix) Tail;
 - (x) Lights;
 - (xi) Other (to be specified)
 - (15) Effect on flight:

(i) None;
(ii) Aborted take-off;
(iii) Precautionary landing;
(iv) Engines shut down;
(v) Other (to be specified)
(16) Sky condition:
(i) No cloud;
(ii) Some cloud;
(iii) Overcast
(17) Precipitation:
(i) Fog;
(ii) Rain;
(iii) Snow
(18) Bird species
(19) Number of birds:
(i) Seen
(A) 1
(B) 2-10
(C) 11-100
(D) More
(ii) Struck
(A) 1
(B) 2-10
(C) 11-100
(D) more
(20) Size of bird:
(i) Small
(ii) Medium
(iii) Large
(21) Pilot warned of birds:
(i) (A) yes/no
(22) Remarks (description of damage, injuries and other pertinent information)
(23) Reporting person/organisation
(24) Address and/or instructions for returning the form to the competent authority
(25) Address within the member State to which any bird remains, including feather fragments, should be sent."

response

Noted
Article will be removed.

comment

2254 comment by: Airport Nuremberg - NUE/EDDN
The reporting of the aerodrome operator can only be in addition to the reporting of airmen because the asked details are not known to the aerodrome operator. The exclusive reporting of the aerodrome operator will in no way provide all the needed information, since most details of the form are not known by the operator.

response

Noted
Article will be removed.

comment	2258	comment by: <i>IDRF e.V. (association of regional airports)</i>
	inadequate	
response	Noted	

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.060(b) – Wildlife hazard management</p>	p. 37
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comment	48	comment by: <i>Airtrace</i>
	<p>Airports must carry out a wildlife risk assessment. A simple risk assessment is not enough to limit wildlife hazard. Each airport should carry out a full environmental study to assess wildlife hazard issues. MANIRA-Airport® Analysis Methodology for the Indicative Level of Wildlife Risk on an airport allows to weigh the analysis between wildlife observations and registered strikes.</p> <p>A full knowledge of the airport and its surroundings is necessary to implement efficient measures.</p>	
response	Noted	

comment	93	comment by: <i>CAA Norway</i>
	We suggest to move AMC1-ADR.AR.C.060 (b) on page 37 to GM.	
response	<p>Noted</p> <p>Article will be removed.</p>	

comment	124	comment by: <i>CAA-NL</i>
	We suggest to change 'possible' into 'practicable' to indicate that also legal and financial considerations could be a consideration not to eliminate existing sites.	
response	<p>Noted</p> <p>Article will be removed.</p>	

comment	287	comment by: <i>Zürich Airport</i>
	remove (or its vicinity) do to the fact, that "aerodrome operator" has no competence in the vicinity of the aerodrome.	
response	<p>Noted</p> <p>This article is addressed to the competent authority. Article will be removed.</p>	

comment	675	comment by: <i>ADP : Aeroports de Paris</i>
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Référence: AMC1-ADR.AR.C.060(b)	Wildlife hazard management MITIGATING MEASURES
Proposition/commentaire	Il convient de modifier de la manière suivante: "Where the elimination of existing sites that may attract wildlife to the aerodrome (or its vicinity) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and that all necessary measures are identified and implemented so that the risk is reduced to a level which is as low as reasonably practicable."
Justification	Ces évaluations ne peuvent pas toujours être conduites par l'exploitant d'aérodrome pour des raisons de compétences techniques et administratives. Par ailleurs une telle disposition devrait se trouver en OR et non en AR.
Traduction de courtoisie	It is appropriate to modify in the following way: "Where the elimination of existing sites that may attract wildlife to the aerodrome (or its vicinity) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and that all necessary measures are identified and implemented so that the risk is reduced to a level which is as low as reasonably practicable." The aerodrome operator for reasons of technical and administrative competencies cannot always conduct these assessments. Besides, such a provision should be in OR and not in AR.

response

Noted
Article will be removed.

comment

781 comment by: *Union des Aéroports français - UAF*
Attachment [#49](#)
UAF NPA 2011-20 (B.II) AMC1-ADR.AR.C.060(b)
Référence: AMC1-ADR.AR.C.060(b)
Wildlife hazard management

MITIGATING MEASURES

Traduction de courtoisie

It is appropriate to modify in the following way: "Where the elimination of existing sites that may attract wildlife to the aerodrome (or its vicinity) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and that all necessary measures are identified and implemented so that the risk is reduced to a level which is as low as reasonably practicable."

The aerodrome operator for reasons of technical and administrative competencies cannot always conduct these assessments. Besides, such a provision should be in OR and not in AR.

response

Noted

Article will be removed.

comment

789 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- Draft Commission Regulation - Article 3 – Oversight capabilities - paragraph 1 (p10)
- ANNEX I – Part-AR - ADR.AR.B.005(c) – Management System (p20)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (c) (p30)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.005(c) – Management System (p13)
- AMC-GM to Annex I – AMC2-ADR.AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
- AMC-GM to Annex I – AMC1-ADR.AR.C.070(a) – confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC1-ADR.AR.C.070(b) – Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex I - GM1-ADR.AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC/GM to ANNEX I – Part-AR - AMC1-ADR.AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES (page 37)
- CS-ADR - Book 1 - CS-ADR-DSN.A.002 – Definitions – 'clearway' (p5)

2. Justification and proposed text / comment

This comment is linked with comment 1008 in book I and 591 in book III. This comment is **critical** as the rules, as written presently, can not be applied in the French system, linked with the definition of "competent authority" and its related obligations. This comment is linked to the issue

on responsibility (see proposal for adding Article 2bis in the Cover regulation).

This comment aims to inform EASA on how the French DGAC understands the notion of "competent authority", and also to list the rules which can not be applied for such competent authority.

France understands the competent authority is the civil aviation authority in charge of the oversight of the aerodrome operator for the tasks mentioned in its aerodrome certificate.

To explain our comment: In France, there are regions, and representatives from the States in these regions ("préfet" in French). The local representative from the State has some responsibilities, particularly for land planning use. For example, this representative is competent on land use matters to apply the obstacle limitation surfaces and to edict rules on policy on aerodromes (e.g. defining the movement area or stating that people working on the aerodrome have to be trained). The "préfet" is not considered as a competent authority, as if he was, its services would have to respect all the rules which apply the competent authorities, in particular the obligation to have a SMS: this is not possible in the French system and it would be too complex, too expensive and not feasible considering the reduced resources.

This should be taken into account while writing the rules: it is proposed to clarify this point by distinguishing in the rules the "competent authorities" and the "other authorities". Moreover, security and local land use authorities are considered as "authorities" but shall not be "competent authorities" as requiring them to have a management system would be totally unfeasible.

However, coordination between these entities exists and can be made through several means. DGAC understands that coordination arrangements can be fulfilled by the mean of: protocols, legally defined coordination, or both entities being members of the government or the same State authorities.

DGAC France fully supports the use of the word "appropriate authority" in the definition of "clearway" in CS-ADR-DSN.A.002 (p5), which gives to France the flexibility we need.

It is proposed to clarify these points by:

- **modifying paragraph (c) of ADR.AR.B.005 as follows :**

"The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance of other competent authorities/authorities of the Member State concerned.

- **replacing the 2 first sentences of AMC1-ADR.AR.B.005(c) by:**

« The coordination between the competent authority(ies) and the other authorities of the Member State should be formally documented, and should encompass, as deemed appropriate by the Member State, the following authorities :

*~~The competent authority should establish coordination arrangements with other **competent** authorities of the Member State. Such coordination arrangements should in particular include the following **competent** authorities ... »~~*

	<ul style="list-style-type: none">• modifying the provisions on surroundings: ADR-AR.C.065, ADR-AR.C.070, ADR-AR.C.075, ADR-AR.C.080 and corresponding AMCs and GMs, and AMC1-ADR.AR.C.060(b) as proposed in specific DGAC's comments.
response	Noted
comment	894 comment by: <i>German Birdstrike Committee</i> The aerodrome operator is not responsible for wildlife conditions in the vicinity of an airport. He is not allowed to enter every place of the vicinity in all cases. The aerodrome operator has not the right to implement any measures on areas that do not belong to his property.
response	Noted This article is addressed to the competent authority. Article will be removed.
comment	1003 comment by: <i>NATS National Air Traffic Services Limited</i> There are two identically named AMC. Suggest renaming or merging into single AMC.
response	Noted Article will be removed.
comment	1286 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i> <u>1. Affected paragraphs</u> <ul style="list-style-type: none">• AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(a) — Wildlife hazard management – REPORTING FORM (page 34 to 37)• AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(b) — Wildlife hazard management – MITIGATING MEASURES (page 37)• AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(b) — Wildlife hazard management – PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES – BIRD HAZARD (page 37) <u>2. Justification and proposed text / comment</u> <u>AMC1-ADR.AR.C.060(a) — Wildlife hazard management – REPORTING FORM</u> The list of information to be included in the form in paragraph (b) of AMC1-ADR.AR.C.060(a) is not exactly the same as in the French regulation (Arrêté du 10 Avril 2007). The AMC includes "Parked" as phase of flight but not "holdings" or "unknown". This is not a specification from ICAO Annex 14, which gives flexibility to States to defined their reporting system, which is already is place (Annex 14 paragraph 9.4.1 states that : "The wildlife strike hazard on, or in the vicinity of, an aerodrome shall be assessed through:

a) the establishment of a national procedure for recording and reporting wildlife strikes to aircraft; [...]”). To avoid to change an existing system which works well, and to avoid costly changes and added workload, it is proposed to keep paragraph (a) in this AMC (which is in line with ICAO Annex 14) and move paragraph (b) of AMC1-ADR.AR.C.060(a) in GM:

“AMC1-ADR.AR.C.060(a)- Wildlife hazard management – REPORTING FORM MECHANISM

(a) *The competent authority should establish a mechanism for the collection and analysis of wildlife strike (or near-misses) reports. It should also forward the wildlife strike reports to the ICAO to be included in the ICAO Bird Strike Information System (IBIS) database.*

(b) *The competent authority should ensure that the reporting forms (paper or electronic format) used by the aerodrome operators or other parties for reporting wildlife strikes, contain adequate at least the following information.:*

- (1) Operator involved*
- (2) Aircraft make/model*
- (3) Engine make/model*
- (4) Aircraft registration*
- (5) Date, (day, month year)*
- (6) Local time*
- (7) Dawn, day, dusk, night*
- (8) Aerodrome name*
- (9) Runway used*
- (10) Location if en route*
- (11) Height AGL in ft*
- (12) Speed (IAS) in kt*
- (13) Phase of flight.:*
 - (i) Parked.;*
 - (ii) Taxi.;*
 - (iii) Take-off run.;*
 - (iv) Climb.;*
 - (v) En route.;*
 - (vi) Descent.;*
 - (vii) Approach.;*
 - (viii) Landing roll.;*
 - (ix) Holding*
 - (x) Unknown*
- (14) Part(s) of aircraft struck or damaged.:*
 - (i) Radome.;*
 - (ii) Windshield.;*
 - (iii) Nose (excluding above).;*
 - (iv) Engine no (1, 2, 3, 4).;*
 - (v) Propeller.;*
 - (vi) Wing/rotor.;*
 - (vii) Fuselage.;*
 - (viii) Landing gear.;*
 - (ix) Tail.;*
 - (x) Lights.;*
 - (xi) Other (to be specified)*
- (15) Effect on flight.:*
 - (i) None.;*
 - (ii) Aborted take-off.;*
 - (iii) Precautionary landing.;*
 - (iv) Engines shut down.;*

- ~~(v) Other (to be specified)~~
- ~~(16) Sky condition:~~
 - ~~(i) No cloud;~~
 - ~~(ii) Some cloud;~~
 - ~~(iii) Overcast~~
- ~~(17) Precipitation:~~
 - ~~(i) Fog;~~
 - ~~(ii) Rain;~~
 - ~~(iii) Snow~~
- ~~(18) Bird species~~
- ~~(19) Number of birds:~~
 - ~~(i) Seen~~
 - ~~(A) 1~~
 - ~~(B) 2-10~~
 - ~~(C) 11-100~~
 - ~~(D) More~~
 - ~~(ii) Struck~~
 - ~~(A) 1~~
 - ~~(B) 2-10~~
 - ~~(C) 11-100~~
 - ~~(D) more~~
- ~~(20) Size of bird:~~
 - ~~(i) Small~~
 - ~~(ii) Medium~~
 - ~~(iii) Large~~
- ~~(21) Pilot warned of birds:~~
 - ~~(i) (A) yes/no~~
- ~~(22) Remarks (description of damage, injuries and other pertinent information)~~
- ~~(23) Reporting person/organisation~~
- ~~(24) Address and/or instructions for returning the form to the competent authority~~
- ~~(25) Address within the member State to which any bird remains, including feather fragments, should be sent."~~

and Add

GM2-ADR.AR.C.060 (a) - Wildlife hazard management - REPORTING FORM

- ~~(a) The information contained in the reporting forms used by the aerodrome operator is consistent with what is needed in IBIS database.~~
- ~~(b) The following information is useful:~~
 - ~~(1) Operator involved~~
 - ~~(2) Aircraft make/model~~
 - ~~(3) Engine make/model~~
 - ~~(4) Aircraft registration~~
 - ~~(5) Date, (day, month year)~~
 - ~~(6) Local time~~
 - ~~(7) Dawn, day, dusk, night~~
 - ~~(8) Aerodrome name~~
 - ~~(9) Runway used~~
 - ~~(10) Location if en route~~
 - ~~(11) Height AGL in ft~~
 - ~~(12) Speed (IAS) in kt~~
 - ~~(13) Phase of flight:~~
 - ~~(i) Parked;~~
 - ~~(ii) Taxi;~~

- (iii) Take off run;
- (iv) Climb;
- (v) En route;
- (vi) Descent;
- (vii) Approach;
- (viii) Landing roll;
- (14) Part(s) of aircraft struck or damaged:
 - (i) Radome;
 - (ii) Windshield;
 - (iii) Nose (excluding above);
 - (iv) Engine no (1, 2, 3, 4);
 - (v) Propeller;
 - (vi) Wing/rotor;
 - (vii) Fuselage;
 - (viii) Landing gear;
 - (ix) Tail;
 - (x) Lights;
 - (xi) Other (to be specified)
- (15) Effect on flight:
 - (i) None;
 - (ii) Aborted take-off;
 - (iii) Precautionary landing;
 - (iv) Engines shut down;
 - (v) Other (to be specified)
- (16) Sky condition:
 - (i) No cloud;
 - (ii) Some cloud;
 - (iii) Overcast
- (17) Precipitation:
 - (i) Fog;
 - (ii) Rain;
 - (iii) Snow
- (18) Bird species
- (19) Number of birds:
 - (i) Seen
 - (A) 1
 - (B) 2-10
 - (C) 11-100
 - (D) More
 - (ii) Struck
 - (A) 1
 - (B) 2-10
 - (C) 11-100
 - (D) more
- (20) Size of bird:
 - (i) Small
 - (ii) Medium
 - (iii) Large
- (21) Pilot warned of birds:
 - (i) (A) yes/no
- (22) Remarks (description of damage, injuries and other pertinent information)
- (23) Reporting person/organisation
- (24) Address and/or instructions for returning the form to the competent authority
- (25) Address within the member State to which any bird remains,

including feather fragments, should be sent."

AMC1-ADR.AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES

The AMC1 includes the possibility that the hazard source cannot be eliminated which the IR does not consider. The AMC1 requires that all necessary measures are implemented which is contradictory with reducing the risk to as low as reasonably practicable.

Moreover, the word wildlife is not appropriate, as animals can be dangerous even if not "wild" : it is proposed to replace "wildlife" by "animals".

European rules are using the word "surroundings" instead of "vicinity". (See Reg 216-2008 – Chapter 1 article 1 & article 8A and Annex Va, C.2 (e)). See comment on article 10 of the cover regulation on this point. Another comment is linked with the one on competent authorities which is critical : the representative from the State in regions ("préfet") who has in charge the land use planning, can not be a competent authority (not possible to implement a management system).

Hence the proposed texts:

"AMC1-ADR.AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES

Where the elimination of existing sites that may attract ~~animals~~ wildlife to the aerodrome (or its ~~vicinity~~ surroundings) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and the competent authorities and other authorities of the Member State should ensure that mitigating all-necessary measures are identified and implemented so that the risk is reduced to a acceptable level which is as low as reasonably practicable."

Concerning AMC1-ADR.AR.C.060(b) – Wildlife hazard management – PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES – BIRD HAZARD :

This AMC details a non-exhaustive list and is surprising on some points (for instance "theatre").

This AMC should be degraded as GM with a "may" instead of a "should".

This AMC is in fact AMC2 (mistake in the number).

Consequently, it is proposed to write it as follows:

"~~AMC1~~GM3-ADR.AR.C.060(b) – Wildlife hazard management – PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES – BIRD HAZARD

The following is a non-exhaustive list of types of land uses which ~~should~~ may in particular be prevented, eliminated or mitigated:

- (a) fish processing;*
- (b) agriculture;*
- (c) cattle feed lots;*
- (d) garbage dumps and landfill sites;*
- (e) factory roofs and parking lots;*
- (f) theatres and food outlets;*
- (g) wildlife refuges;*
- (h) artificial and natural lakes;*
- (i) golf or polo-courses, etc;*

	<p><i>(j) animal farms; and (k) slaughter-houses."</i></p>
response	<p>Noted</p> <p>With regard to AMC1-ADR.AR.C.060(b) – Mitigating measures, article will be removed.</p> <p>The term 'wildlife' is generally known and used. Moreover, Agency would like to keep this consistent with Basic Regulation and ICAO.</p> <p>The term 'vicinity' will be replaced by the term 'surroundings' to be consistent with the Basic regulation terminology.</p>
comment	<p>1675 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>It is appropriate to modify in the following way: "Where the elimination of existing sites that may attract wildlife to the aerodrome (or its vicinity) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and that all necessary measures are identified and implemented so that the risk is reduced to a level which is as low as reasonably practicable."</p> <p>The aerodrome operator for reasons of technical and administrative competencies cannot always conduct these assessments. Besides, such a provision should be in OR and not in AR.</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>1962 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to modify in the following way: "Where the elimination of existing sites that may attract wildlife to the aerodrome (or its vicinity) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and that all necessary measures are identified and implemented so that the risk is reduced to a level which is as low as reasonably practicable."</p> <p>The aerodrome operator for reasons of technical and administrative competencies cannot always conduct these assessments. Besides, such a provision should be in OR and not in AR.</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>2257 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>The aerodrome operator can only implement measures <u>on</u> the aerodrome not in the vicinity, since he can take no physical and legal action to eliminate the risks within the surroundings of the aerodrome. This is part of the competent local authority.</p>

response Noted
This article is addressed to the competent authority.
Article will be removed.

comment 2266 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
This article needs to be more precise in the affected zones.

response Noted
Article will be removed.

comment 2307 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

<u>Référence: AMC1-ADR.AR.C.060(b)</u>	Wildlife hazard management MITIGATING MEASURES
Proposition/commentaire	Il convient de modifier de la manière suivante: "Where the elimination of existing sites that may attract wildlife to the aerodrome (or its vicinity) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and that all necessary measures are identified and implemented so that the risk is reduced to a level which is as low as reasonably practicable."
Justification	Ces évaluations ne peuvent pas toujours être conduites par l'exploitant d'aérodrome pour des raisons de compétences techniques et administratives. Par ailleurs une telle disposition devrait se trouver en OR et non en AR.
Traduction de courtoisie	It is appropriate to modify in the following way: "Where the elimination of existing sites that may attract wildlife to the aerodrome (or its vicinity) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and that all necessary measures are identified and implemented so that the risk is reduced to a level which is as low as reasonably practicable." The aerodrome operator for reasons of technical and administrative competencies cannot always conduct these assessments.

	Besides, such a provision should be in OR and not in AR.
response	Noted Article will be removed.

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.060(b) – Wildlife hazard management</p>	p. 37
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comment	49 comment by: <i>Airtrace</i> The title includes only bird hazard. However, wildlife hazard should always be used, for birds are not the only animals to present a risk for aviation. Furthermore, other types of animals can be attracted by the listed land use. Wildlife hazard is the general term that should always be used to include any situation.
response	Noted

comment	50 comment by: <i>Airtrace</i> The different listed land uses should be prevented, eliminated or mitigated. However, only a full environmental study of the airport and its surroundings will allow to determine the specific risks for each airport, and to implement a wildlife hazard management plan to limit attractivity for wildlife and to deal with the residual risk. Each airport has a specific situation and particular characteristics. General recommendations are not applicable as such for each airport.
response	Noted Article will be removed.

comment	51 comment by: <i>Airtrace</i> This item is very general and does not specify who is responsible of the study of such types of land use, who must prevent their construction and how or who must implement mitigation measures.
response	Noted Article will be removed.

comment	125 comment by: <i>CAA-NL</i> Please change AMC1 into AMC2. We suggest to delete 'eliminated', because this is legally not possible in
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	<p>It is appropriate to modify the title in the following way: « AMC1-ADR.AR.C.60(b) » in « AMC1.AR.C.060(c) ». Moreover we want to transfer the non exhaustive list (a) to (k) to GM because there are only examples.</p>
response	<p>Noted</p> <p>Letter in brackets refers to specific paragraph, so C.60(c) cannot be used as there is no such article on IR level. However, this article will be removed.</p>
comment	<p>1004 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>There are two identically named AMC. Suggest renaming or merging into single AMC.</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>1175 comment by: <i>Federal Office of Civil Aviation FOCA</i></p> <p>AMC1.ADR.AR.C.060 (b) - Wildlife hazard management: EASA should reformulate the provision and put more precision in the affected zones. The list of type of land use is not realistic and too vague in relation to the location of the aerodrome and flight paths.</p>
response	<p>Accepted</p> <p>Article will be removed.</p>
comment	<p>1239 comment by: <i>UK CAA</i></p> <p>Page No: 37</p> <p>Paragraph No: AMC1-ADR.AR.C.060 (b) (the second AMC listed under this heading)</p> <p>Comment: This list is excessive and inaccurate, and this should be deleted.</p> <p>Justification: Many of the items listed are acceptable types of land use when managed properly. For example, agriculture exists around almost every aerodrome – what matters is how it is managed and cooperation regarding its use with landowners. Another example is parking lots (car parks is the term used in Europe) - aerodromes require car parks close by for passenger and staff use.</p> <p>Proposed Text: (for IR) Delete this AMC.</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>1286 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i></p>

1. Affected paragraphs

- AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(a) — Wildlife hazard management – REPORTING FORM (page 34 to 37)
- AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(b) — Wildlife hazard management – MITIGATING MEASURES (page 37)
- AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(b) — Wildlife hazard management – PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES – BIRD HAZARD (page 37)

2. Justification and proposed text / comment

AMC1-ADR.AR.C.060(a) – Wildlife hazard management – REPORTING FORM

The list of information to be included in the form in paragraph (b) of AMC1-ADR.AR.C.060(a) is not exactly the same as in the French regulation (Arrêté du 10 Avril 2007). The AMC includes "Parked" as phase of flight but not "holdings" or "unknown".

This is not a specification from ICAO Annex 14, which gives flexibility to States to defined their reporting system, which is already in place (Annex 14 paragraph 9.4.1 states that : "The wildlife strike hazard on, or in the vicinity of, an aerodrome shall be assessed through:

a) the establishment of a national procedure for recording and reporting wildlife strikes to aircraft; [...]". To avoid to change an existing system which works well, and to avoid costly changes and added workload, it is proposed to keep paragraph (a) in this AMC (which is in line with ICAO Annex 14) and move paragraph (b) of AMC1-ADR.AR.C.060(a) in GM:

"AMC1-ADR.AR.C.060(a)- Wildlife hazard management – REPORTING FORM MECHANISM

(a) The competent authority should establish a mechanism for the collection and analysis of wildlife strike (or near-misses) reports. It should also forward the wildlife strike reports to the ICAO to be included in the ICAO Bird Strike Information System (IBIS) database.

(b) The competent authority should ensure that the reporting forms (paper or electronic format) used by the aerodrome operators or other parties for reporting wildlife strikes, contain adequate ~~at least the following information~~:

- (1) Operator involved*
- (2) Aircraft make/model*
- (3) Engine make/model*
- (4) Aircraft registration*
- (5) Date, (day, month year)*
- (6) Local time*
- (7) Dawn, day, dusk, night*
- (8) Aerodrome name*
- (9) Runway used*
- (10) Location if en route*
- (11) Height AGL in ft*
- (12) Speed (IAS) in kt*
- (13) Phase of flight:*
 - (i) Parked;*
 - (ii) Taxi;*
 - (iii) Take-off run;*
 - (iv) Climb;*

- ~~(v) En route;~~
- ~~(vi) Descent;~~
- ~~(vii) Approach;~~
- ~~(viii) Landing roll;~~
- ~~(ix) Holding~~
- ~~(x) Unknown~~
- ~~(14) Part(s) of aircraft struck or damaged:~~
 - ~~(i) Radome;~~
 - ~~(ii) Windshield;~~
 - ~~(iii) Nose (excluding above);~~
 - ~~(iv) Engine no (1, 2, 3, 4);~~
 - ~~(v) Propeller;~~
 - ~~(vi) Wing/rotor;~~
 - ~~(vii) Fuselage;~~
 - ~~(viii) Landing gear;~~
 - ~~(ix) Tail;~~
 - ~~(x) Lights;~~
 - ~~(xi) Other (to be specified)~~
- ~~(15) Effect on flight:~~
 - ~~(i) None;~~
 - ~~(ii) Aborted take-off;~~
 - ~~(iii) Precautionary landing;~~
 - ~~(iv) Engines shut down;~~
 - ~~(v) Other (to be specified)~~
- ~~(16) Sky condition:~~
 - ~~(i) No cloud;~~
 - ~~(ii) Some cloud;~~
 - ~~(iii) Overcast~~
- ~~(17) Precipitation:~~
 - ~~(i) Fog;~~
 - ~~(ii) Rain;~~
 - ~~(iii) Snow~~
- ~~(18) Bird species~~
- ~~(19) Number of birds:~~
 - ~~(i) Seen~~
 - ~~(A) 1~~
 - ~~(B) 2-10~~
 - ~~(C) 11-100~~
 - ~~(D) More~~
 - ~~(ii) Struck~~
 - ~~(A) 1~~
 - ~~(B) 2-10~~
 - ~~(C) 11-100~~
 - ~~(D) more~~
- ~~(20) Size of bird:~~
 - ~~(i) Small~~
 - ~~(ii) Medium~~
 - ~~(iii) Large~~
- ~~(21) Pilot warned of birds:~~
 - ~~(i) (A) yes/no~~
- ~~(22) Remarks (description of damage, injuries and other pertinent information)~~
- ~~(23) Reporting person/organisation~~
- ~~(24) Address and/or instructions for returning the form to the competent authority~~
- ~~(25) Address within the member State to which any bird remains;~~

~~including feather fragments, should be sent."~~

and Add

GM2-ADR.AR.C.060 (a) - Wildlife hazard management - REPORTING FORM

(a) The information contained in the reporting forms used by the aerodrome operator is consistent with what is needed in IBIS database.

(b) The following information is useful:

- (1) Operator involved
- (2) Aircraft make/model
- (3) Engine make/model
- (4) Aircraft registration
- (5) Date, (day, month year)
- (6) Local time
- (7) Dawn, day, dusk, night
- (8) Aerodrome name
- (9) Runway used
- (10) Location if en route
- (11) Height AGL in ft
- (12) Speed (IAS) in kt
- (13) Phase of flight:
 - (i) Parked;
 - (ii) Taxi;
 - (iii) Take off run;
 - (iv) Climb;
 - (v) En route;
 - (vi) Descent;
 - (vii) Approach;
 - (viii) Landing roll;
- (14) Part(s) of aircraft struck or damaged:
 - (i) Radome;
 - (ii) Windshield;
 - (iii) Nose (excluding above);
 - (iv) Engine no (1, 2, 3, 4);
 - (v) Propeller;
 - (vi) Wing/rotor;
 - (vii) Fuselage;
 - (viii) Landing gear;
 - (ix) Tail;
 - (x) Lights;
 - (xi) Other (to be specified)
- (15) Effect on flight:
 - (i) None;
 - (ii) Aborted take-off;
 - (iii) Precautionary landing;
 - (iv) Engines shut down;
 - (v) Other (to be specified)
- (16) Sky condition:
 - (i) No cloud;
 - (ii) Some cloud;
 - (iii) Overcast
- (17) Precipitation:
 - (i) Fog;
 - (ii) Rain;
 - (iii) Snow
- (18) Bird species

(19) Number of birds:

(i) Seen

(A) 1

(B) 2-10

(C) 11-100

(D) More

(ii) Struck

(A) 1

(B) 2-10

(C) 11-100

(D) more

(20) Size of bird:

(i) Small

(ii) Medium

(iii) Large

(21) Pilot warned of birds:

(i) (A) yes/no

(22) Remarks (description of damage, injuries and other pertinent information)

(23) Reporting person/organisation

(24) Address and/or instructions for returning the form to the competent authority

(25) Address within the member State to which any bird remains, including feather fragments, should be sent."

AMC1-ADR.AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES

The AMC1 includes the possibility that the hazard source cannot be eliminated which the IR does not consider. The AMC1 requires that all necessary measures are implemented which is contradictory with reducing the risk to as low as reasonably practicable.

Moreover, the word wildlife is not appropriate, as animals can be danger even if not "wild" : it is proposed to replace "wildlife" by "animals".

European rules are using the word "surroundings" instead of "vicinity". (See Reg 216-2008 – Chapter 1 article 1 & article 8A and Annex Va, C.2 (e)). See comment on article 10 of the cover regulation on this point.

Another comment is linked with the one on competent authorities which is critical : the representative from the State in regions ("préfet") who has in charge the land use planning, can not be a competent authority (not possible to implement a management system).

Hence the proposed texts:

"AMC1-ADR.AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES

Where the elimination of existing sites that may attract animals wildlife to the aerodrome (or its vicinity surroundings) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and the competent authorities and other authorities of the Member State should ensure that mitigating all-necessary measures are identified and implemented so that the risk is reduced to a acceptable level which is as low as reasonably practicable."

Concerning AMC1-ADR.AR.C.060(b) – Wildlife hazard management – PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES – BIRD HAZARD :

This AMC details a non-exhaustive list and is surprising on some points (for instance "theatre").
This AMC should be degraded as GM with a "may" instead of a "should".
This AMC is in fact AMC2 (mistake in the number).
Consequently, it is proposed to write it as follows:

"~~AMC1~~GM3-ADR.AR.C.060(b) – Wildlife hazard management – PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES – BIRD HAZARD

The following is a non-exhaustive list of types of land uses which ~~should~~ may in particular be prevented, eliminated or mitigated:

- (a) fish processing;
- (b) agriculture;
- (c) cattle feed lots;
- (d) garbage dumps and landfill sites;
- (e) factory roofs and parking lots;
- (f) theatres and food outlets;
- (g) wildlife refuges;
- (h) artificial and natural lakes;
- (i) golf or polo-courses, etc;
- (j) animal farms; and
- (k) slaughter-houses."

response

Noted

With regard to AMC1-ADR.AR.C.060(b) – Prevention of incompatible land use around aerodromes – bird hazard, article will be removed.

comment

1302 comment by: Euroairport Bâle-Mulhouse
Attachment [#51](#)
Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.AR.C.060(b)

Référence: AMC1-ADR.AR.C.060(b)
Wildlife hazard management
MITIGATING MEASURES

Traduction de courtoisie
It is appropriate to modify in the following way: "Where the elimination of existing sites that may attract wildlife to the aerodrome (or its vicinity) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and that all necessary measures are identified and implemented so that the risk is reduced to a level which is as low as reasonably practicable."
The aerodrome operator for reasons of technical and administrative competencies cannot always conduct these assessments.
Besides, such a provision should be in OR and not in AR.

response

Noted

Letter in brackets refers to specific paragraph, so C.60(c) cannot be used as there is no such article on IR level.

However, this article will be removed.

comment 1303 comment by: *Euroairport Bâle-Mulhouse*
Attachment [#52](#)
Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.AR.C.60(b)
Référence: AMC1-ADR.AR.C.60(b)
Wildlife hazard management
PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES –
BIRD HAZARD
Traduction de courtoisie
It is appropriate to modify the title in the following way: « AMC1-
ADR.AR.C.60(b) » in « AMC1.AR.C.060(c) ».
Moreover we want to transfer the non exhaustive list (a) to (k) to GM
because there are only examples.

response Noted
Letter in brackets refers to specific paragraph, so C.60(c) cannot be used
as there is no such article on IR level.
However, this article will be removed.

comment 1727 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*
Attachment [#53](#)
UAF NPA 2011-20 (B.II) AMC1-ADR.AR.C.060(b)
Référence: AMC1-ADR.AR.C.060(b)
Wildlife hazard management
MITIGATING MEASURES
Traduction de courtoisie
It is appropriate to modify in the following way: "Where the elimination of
existing sites that may attract wildlife to the aerodrome (or its vicinity) is
not possible, the competent authority should ensure that a safety
assessment of the hazard posed by wildlife to aircraft operations is
conducted by the aerodrome operator and that all necessary measures are
identified and implemented so that the risk is reduced to a level which is
as low as reasonably practicable."
The aerodrome operator for reasons of technical and administrative
competencies cannot always conduct these assessments.
Besides, such a provision should be in OR and not in AR.

response Noted
If referred to AMC1-ADR.AR.C.060(b) – Mitigation measures, article will be
removed.

comment 1960 comment by: *Pau Pyrénées Airport - PUF/LFBP*
It is appropriate to modify the title in the following way: « AMC1-
ADR.AR.C.60(b) » in « AMC1.AR.C.060(c) ».

	<p>Moreover we want to transfer the non exhaustive list (a) to (k) to GM because there are only examples.</p>								
response	<p>Noted</p> <p>Letter in brackets refers to specific paragraph, so C.60(c) cannot be used as there is no such article on IR level. However, this article will be removed.</p>								
comment	<p>2261 comment by: Airport Nuremberg - NUE/EDDN</p> <p>Title should be changed to AMC2-ADR.AR.C.60(b)</p>								
response	<p>Noted</p> <p>Article will be removed.</p>								
comment	<p>2309 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 50%;"><u>Référence: AMC1-ADR.AR.C.60(b)</u></td> <td>Wildlife hazard management PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES — BIRD HAZARD</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Il convient de modifier la numérotation du titre « AMC1-ADR.AR.C.60(b) » en « AMC1.AR.C.060(c) ». Par ailleurs, nous souhaitons transférer la liste non exhaustive (a) à (k) en Guidance Materials.</td> </tr> <tr> <td>Justification</td> <td>Cette liste non exhaustive n'est qu'une suite d'exemples et a sa place en GM.</td> </tr> <tr> <td>Traduction de courtoisie</td> <td>It is appropriate to modify the title in the following way: « AMC1-ADR.AR.C.60(b) » in « AMC1.AR.C.060(c) ». Moreover we want to transfer the non exhaustive list (a) to (k) to GM because there are only examples.</td> </tr> </table>	<u>Référence: AMC1-ADR.AR.C.60(b)</u>	Wildlife hazard management PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES — BIRD HAZARD	Proposition/commentaire	Il convient de modifier la numérotation du titre « AMC1-ADR.AR.C.60(b) » en « AMC1.AR.C.060(c) ». Par ailleurs, nous souhaitons transférer la liste non exhaustive (a) à (k) en Guidance Materials.	Justification	Cette liste non exhaustive n'est qu'une suite d'exemples et a sa place en GM.	Traduction de courtoisie	It is appropriate to modify the title in the following way: « AMC1-ADR.AR.C.60(b) » in « AMC1.AR.C.060(c) ». Moreover we want to transfer the non exhaustive list (a) to (k) to GM because there are only examples.
<u>Référence: AMC1-ADR.AR.C.60(b)</u>	Wildlife hazard management PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES — BIRD HAZARD								
Proposition/commentaire	Il convient de modifier la numérotation du titre « AMC1-ADR.AR.C.60(b) » en « AMC1.AR.C.060(c) ». Par ailleurs, nous souhaitons transférer la liste non exhaustive (a) à (k) en Guidance Materials.								
Justification	Cette liste non exhaustive n'est qu'une suite d'exemples et a sa place en GM.								
Traduction de courtoisie	It is appropriate to modify the title in the following way: « AMC1-ADR.AR.C.60(b) » in « AMC1.AR.C.060(c) ». Moreover we want to transfer the non exhaustive list (a) to (k) to GM because there are only examples.								
response	<p>Noted</p> <p>Letter in brackets refers to specific paragraph, so C.60(c) cannot be used as there is no such article on IR level. However, this article will be removed.</p>								

hazard management

comment 52 comment by: *Airtrace*
The title and text mention several times "bird hazard". However, wildlife hazard should always be used, as birds are not the only animals to present a risk for aviation.
Wildlife hazard is the general term that should always be used to include any situation.

response Noted
Article will be removed.

comment 906 comment by: *German Birdstrike Committee*
It is good that EASA emphasize the importance of the aerodrome vicinity. But also nature conservation must be listed as a critical kind of land use. EASA has to make clear that in case of a conflict flight safety has higher priority than nature conservation. EASA should clearly regulate that Airports are not suitable as an European bird protection area when the species of priority are flight safety relevant.

response Noted
It is in the competence of the Member State to set appropriate balance between safety of operations and nature conservation.
Article will be removed.

comment 1008 comment by: *NATS National Air Traffic Services Limited*
2 comments
There are "should" in this GM thus implying that it is AMC rather than GM. Suggest rewriting removing "should".
There are two GM to ADR.AR.C.060(b) which are not two different GM to a respective AMC. This approach is contrary to previous EASA drafting principles. Suggest merge the two GM into a single GM

response Noted
GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.
Article will be removed.

comment	<p>214 comment by: KLM</p>									
	<p>Add:</p> <p>(c) The competent authority shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of wild life.</p> <p>Clarification: Land use planning by local councils and /or by businesses in a defined area around the airport and its runways must consult with the aerodrome operator to avoid activities that attracts wildlife (birds) that have an hazardous effect on the safety of flights.</p>									
response	<p>Noted</p> <p>Article will be removed.</p>									
comment	<p>928 comment by: German Birdstrike Committee</p>									
	<p>EASA should also give small countries the opportunity to join a national committee of a bigger European neighbour country or built a committee together with other small European countries.</p>									
response	<p>Noted</p>									
comment	<p>1009 comment by: NATS National Air Traffic Services Limited</p>									
	<p><u>2 comments</u></p> <p>There are "should" in this GM thus implying that it is AMC rather than GM. Suggest rewriting removing "should".</p> <p>There are two GM to ADR.AR.C.060(b) which are not two different GM to a respective AMC. This approach is contrary to previous EASA drafting principles. Suggest merge the two GM into a single GM</p>									
response	<p>Noted</p> <p>GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.</p> <p>Article will be removed.</p>									
comment	<p>1825 comment by: ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</p>									
	<p>Attachment #54</p> <p>ADBM - NPA 2011-20 (B.II) AMC1-ADR.AR.C.060(b)</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 33%;">Référence:</td> <td style="width: 33%;"></td> <td style="width: 33%; text-align: right;">AMC1-ADR.AR.C.060(b)</td> </tr> <tr> <td>Wildlife</td> <td style="text-align: center;">hazard</td> <td style="text-align: right;">management</td> </tr> <tr> <td>MITIGATING</td> <td></td> <td style="text-align: right;">MEASURES</td> </tr> </table> <p>Traduction de courtoisie</p> <p>It is appropriate to modify in the following way: "Where the elimination of</p>	Référence:		AMC1-ADR.AR.C.060(b)	Wildlife	hazard	management	MITIGATING		MEASURES
Référence:		AMC1-ADR.AR.C.060(b)								
Wildlife	hazard	management								
MITIGATING		MEASURES								

existing sites that may attract wildlife to the aerodrome (or its vicinity) is not possible, the competent authority should ensure that a safety assessment of the hazard posed by wildlife to aircraft operations is conducted by the aerodrome operator and that all necessary measures are identified and implemented so that the risk is reduced to a level which is as low as reasonably practicable." The aerodrome operator for reasons of technical and administrative competencies cannot always conduct these assessments. Besides, such a provision should be in OR and not in AR.

response

Noted

If referred to AMC1-ADR.AR.C.060(b), article will be removed.

comment

2680

comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#55](#)

ADBM - NPA 2011-20 (B.II) AMC1-ADR.AR.C.60(b)

Référence: AMC1-ADR.AR.C.60(b)
Wildlife hazard management
PREVENTION OF INCOMPATIBLE LAND USE AROUND AERODROMES — BIRD HAZARD

Traduction de courtoisie
It is appropriate to modify the title in the following way: « AMC1-ADR.AR.C.60(b) » in « AMC1.AR.C.060(c) ». Moreover we want to transfer the non exhaustive list (a) to (k) to GM because there are only examples.

response

Noted

Letter in brackets refers to specific paragraph, so C.60(c) cannot be used as there is no such article on IR level. However, this article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM1-ADR.AR.C.065 – Obstacles – Objects p. 38-39

comment

687

comment by: *ADP : Aeroports de Paris*

Référence: GM1-ADR.AR.C.065	Obstacles – Objects GENERAL
Proposition/commentaire	Il convient de modifier le 5ème paragraphe de la manière suivante: "Thus, it is for the Member State's competent authority to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the

	Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."
Justification	C'est en effet l'Etat membre qui exerce son pouvoir dans le domaine de l'urbanisme et généralement pas l'autorité compétente (comme c'est le cas en France). Cela dépend de l'organisation administrative de l'Etat.
Traduction de courtoisie	<p>It is appropriate to modify the fifth paragraph in the following way: "Thus, it is for the Member State's competent authority to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."</p> <p>This is the Member State which exercises its power in urbanism matter and generally not the competent authority (which is the case in France). It depends on the State administrative organisation.</p>

response

Noted
 Article will be removed.

comment

783 comment by: *Union des Aéroports français - UAF*
 Attachment [#56](#)
 UAF NPA 2011-20 (B.II) GM1-ADR.AR.C.065
 Référence: GM1-ADR.AR.C.065
 Obstacles — Objects
 GENERAL
 Traduction de courtoisie
 It is appropriate to modify the fifth paragraph in the following way: "Thus, it is for the Member State's ~~competent authority~~ to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."
 This is the Member State which exercises its power in urbanism matter and generally not the competent authority (which is the case in France). It depends on the State administrative organisation.

response

Noted

Article will be removed.

comment

789 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- Draft Commission Regulation - Article 3 – Oversight capabilities - paragraph 1 (p10)
- ANNEX I – Part-AR - ADR.AR.B.005(c) – Management System (p20)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (c) (p30)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.005(c) – Management System (p13)
- AMC-GM to Annex I – AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
- AMC-GM to Annex I – AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC2-ADR-AR.C.070(a) – Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC1-ADR-AR.C.070(b) – Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC/GM to ANNEX I – Part-AR - AMC1-ADR-AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES (page 37)
- CS-ADR - Book 1 - CS-ADR-DSN.A.002 – Definitions – 'clearway' (p5)

2. Justification and proposed text / comment

This comment is linked with comment 1008 in book I and 591 in book III. This comment is **critical** as the rules, as written presently, can not be applied in the French system, linked with the definition of "competent authority" and its related obligations. This comment is linked to the issue on responsibility (see proposal for adding Article 2bis in the Cover regulation).

This comment aims to inform EASA on how the French DGAC understands the notion of "competent authority", and also to list the rules which can not be applied for such competent authority.

France understands the competent authority is the civil aviation authority in charge of the oversight of the aerodrome operator for the tasks mentioned in its aerodrome certificate.

To explain our comment: In France, there are regions, and representatives from the States in these regions ("préfet" in French). The local representative from the State has some responsibilities, particularly for land planning use. For example, this representative is competent on land use matters to apply the obstacle limitation surfaces and to edict rules on

policy on aerodromes (e.g. defining the movement area or stating that people working on the aerodrome have to be trained). The "préfet" is not considered as a competent authority, as if he was, its services would have to respect all the rules which apply the competent authorities, in particular the obligation to have a SMS: this is not possible in the French system and it would be too complex, too expensive and not feasible considering the reduced resources.

This should be taken into account while writing the rules: it is proposed to clarify this point by distinguishing in the rules the "competent authorities" and the "other authorities". Moreover, security and local land use authorities are considered as "authorities" but shall not be "competent authorities" as requiring them to have a management system would be totally unfeasible.

However, coordination between these entities exists and can be made through several means. DGAC understands that coordination arrangements can be fulfilled by the mean of: protocols, legally defined coordination, or both entities being members of the government or the same State authorities.

DGAC France fully supports the use of the word "appropriate authority" in the definition of "clearway" in CS-ADR-DSN.A.002 (p5), which gives to France the flexibility we need.

It is proposed to clarify these points by:

- **modifying paragraph (c) of ADR.AR.B.005 as follows :**

"The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance of other competent authorities/authorities of the Member State concerned.

- **replacing the 2 first sentences of AMC1-ADR.AR.B.005(c) by:**

« The coordination between the competent authority(ies) and the other authorities of the Member State should be formally documented, and should encompass, as deemed appropriate by the Member State, the following authorities :

*~~The competent authority should establish coordination arrangements with other **competent** authorities of the Member State. Such coordination arrangements should in particular include the following **competent** authorities ... »~~*

- **modifying the provisions on surroundings: ADR-AR.C.065, ADR-AR.C.070, ADR-AR.C.075, ADR-AR.C.080 and corresponding AMCs and GMs, and AMC1-ADR.AR.C.060(b) as proposed in specific DGAC's comments.**

response Noted

comment 1013 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs
Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that

- extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- ADR.AR.C.075 — Protection of communication, navigation

and surveillance systems

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

- (a) establish protection areas for each aeronautical communications, navigation and surveillance system;
- (b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

*(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."*

- Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

*(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:*

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with*

at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

~~(3) hazards related to human activities and land use in order to take action as appropriate.~~

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;
(3) the dazzling caused by large and highly reflective surfaces;
(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;
(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

~~Note: these provisions are already dealt with in:~~

- ~~· CS-ADR-DSN.B.165 — Objects on runway strips (p18),~~
- ~~· CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),~~
- ~~· CS-ADR-DSN.J.475 — Non-precision approach runways (p45),~~
- ~~· CS-ADR-DSN.J.480 — Precision approach runways (p46),~~
- ~~· CS-ADR-DSN.J.485 — Runways meant for take-off (p47),~~
- ~~· CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).~~

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).~~

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).~~

response Noted

comment

1014

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles - Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects -precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects -runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects - other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects - obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects - wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle

- restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
 - AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
 - AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
 - AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
 - AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
 - AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
 - AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft

against the hazardous effects of laser emitters.”

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

“The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

- (a) establish protection areas for each aeronautical communications, navigation and surveillance system;
- (b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a).”

- **ADR.AR.C.080 – Other activities**

“The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated.”

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

“WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]”

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above.”

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing,**

misleading and hazardous lights

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

- ~~(1) obstacles and the possibility of induced turbulence;~~
- ~~(2) the use of hazardous, confusing and misleading lights;~~
- ~~(3) the dazzling caused by large and highly reflective surfaces;~~
- ~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~
- ~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

~~Note: these provisions are already dealt with in:~~

- ~~• CS-ADR-DSN.B.165 — Objects on runway strips (p18),~~
- ~~• CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),~~
- ~~• CS-ADR-DSN.J.475 — Non-precision approach runways (p45),~~
- ~~• CS-ADR-DSN.J.480 — Precision approach runways (p46),~~
- ~~• CS-ADR-DSN.J.485 — Runways meant for take-off (p47),~~
- ~~• CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take off climb surface (p170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).~~

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).~~

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 – Lighting of objects (p150).

response Noted

comment 1015 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- Annex III - ADR-OPS.B.075 – Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 – Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) – Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) – Obstacles – Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) – Obstacles – Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) – Obstacles – Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) – Obstacles – Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) – Obstacles – Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) – Obstacles – Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) –Obstacles – Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) – Obstacles – Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) – Confusing, misleading and hazardous lights (p52)

- AMC-GM to Annex I - AMC1-ADR.AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

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Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety

or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) *The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above.*"

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) *Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above.*"

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) *The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:*

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article

8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks

associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC8 ADR OPS.B.075 — Marking of objects (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 – Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 – Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 – Lighting of objects (p150).

response Noted

comment 1031 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (c) (p30)
- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)

2. Justification and proposed text / comment

This comment is linked with comment 1308 in book I.

* The characteristics of the Obstacle Limitation Surfaces, protection surfaces and other areas attached to an aerodrome are specific to the physical characteristics of the aerodrome and to the certification specifications or ELOS or special conditions applicable to the aerodrome, which are notified in its certification basis. Therefore such surfaces and areas can only be defined with regard to the actual surfaces and areas established in the aerodrome Certification Basis.

Thus, authorities establish surfaces in accordance with the certification basis of the aerodrome, but with some possible adaptations, for instance to take into account future developments of the aerodrome; see the proposed modifications of paragraph (a) of ADR.AR.C.065 and the proposed *AMC-ADR.AR.C.065 – Obstacles – Objects*.

* Moreover, some provisions of GM1-ADR-AR.C.065 (b);(c), in particular the first two sentences, are important enough to be in an acceptable means of compliance of ADR.AR.C.065. Thus DGAC proposes to add, just before it, an AMC giving the general principles that a Member State should follow to comply with ADR.AR.C.065.

* Finally, the competent authority, as understood by DGAC has no legal power to control the obstacles since this is land use services' competency only. Thus, it is proposed to indicate when necessary that the control is done by the competent authority or other authorities of the Member State, according to the system and legal provisions of the Member State. This is a **critical** point for the French DGAC.

ADR.AR.C.065 – Obstacles-Objects

“(a) The competent authority shall:

(1) establish in accordance with in the Certification Basis of the aerodrome obstacle limitation surfaces, protection surfaces and other areas associated with an aerodrome and its surroundings to define the limits to which objects may project into the airspace;[...]”

AMC-ADR.AR.C.065 – Obstacles – Objects

“GENERAL

The establishment of the obstacle limitation surfaces, protection surfaces and other areas associated with an aerodrome aims at ensuring the safety and regularity of aircraft operations.

Because of their significance, the Member State should establish a mechanism to ensure that such established surfaces and areas continuously meet the applicable requirements. In particular, the mechanism should take into account the obstacle limitations surfaces established in accordance with the certification basis of the aerodrome."

GM1-ADR.AR.C.065 – Obstacles – Objects

"GENERAL

The establishment of the obstacle limitation surfaces, protection surfaces and other areas associated with an aerodrome aims at ensuring the safety and regularity of aircraft operations.

Because of their significance, it is necessary to establish a mechanism to ensure that such established surfaces and areas continuously meet the applicable requirements.

Outside the boundaries of the aerodrome the aerodrome operator has normally no legal power to protect the established surfaces and areas associated with the aerodrome.

Without prejudice to the obligations of the aerodrome operator to monitor the activities around the aerodrome and to take the actions foreseen in Part-ADR.OPS, it is understood that this may not be sufficient to control/prevent the development of new obstacles, or extensions to existing ones, or to remove such obstacles that may endanger safety or make the aerodrome unusable.

Thus, it is for the Member State's competent authority or other authorities of the Member State, without prejudice to the system and legal provisions of the Member State, to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority.

In any case, the way in which this objective is to be accomplished, as well as the coordination mechanisms required to be set-up, are left to the Member States."

response

Noted

With regard to GM1-ADR.AR.C.065, article will be removed.

comment

1305

comment by: Euroairport Bâle-Mulhouse

Attachment [#57](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II)GM1-ADR.AR.C.065

Référence:	GM1-ADR.AR.C.065
Obstacles	— Objects
GENERAL	

Traduction de courtoisie

It is appropriate to modify the fifth paragraph in the following way: "Thus, it is for the Member State's competent authority to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."

This is the Member State which exercises its power in urbanism matter and generally not the competent authority (which is the case in France). It

depends on the State administrative organisation.

response Noted
Article will be removed.

comment 1691 comment by: *Aéroport de Marseille - MRS/LFML*

It is appropriate to modify the fifth paragraph in the following way: "Thus, it is for the Member State's ~~competent authority~~ to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."

This is the Member State which exercises its power in urbanism matter and generally not the competent authority (which is the case in France). It depends on the State administrative organisation.

response Noted
Article will be removed.

comment 1738 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#58](#)

UAF	NPA	2011-20	(B.II)	GM1-ADR.AR.C.065
Référence:				GM1-ADR.AR.C.065
Obstacles			—	Objects
GENERAL				

Traduction de courtoisie

It is appropriate to modify the fifth paragraph in the following way: "Thus, it is for the Member State's ~~competent authority~~ to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."

This is the Member State which exercises its power in urbanism matter and generally not the competent authority (which is the case in France). It depends on the State administrative organisation.

response Noted
Article will be removed.

comment 1826 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#59](#)

ADBM - NPA 2011-20 (B.II) GM1-ADR.AR.C.065

Référence:				GM1-ADR.AR.C.065
Obstacles			—	Objects

GENERAL

Traduction de courtoisie
 It is appropriate to modify the fifth paragraph in the following way: "Thus, it is for the Member State's ~~competent authority~~ to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."
 This is the Member State which exercises its power in urbanism matter and generally not the competent authority (which is the case in France). It depends on the State administrative organisation.

response

Noted
 Article will be removed.

comment

1954 comment by: Pau Pyrénées Airport - PUF/LFBP

It is appropriate to modify the fifth paragraph in the following way: "Thus, it is for the Member State's ~~competent authority~~ to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."
 This is the Member State which exercises its power in urbanism matter and generally not the competent authority (which is the case in France). It depends on the State administrative organisation.

response

Noted
 Article will be removed.

comment

2316 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence: GM1-ADR.AR.C.065	Obstacles – Objects GENERAL
Proposition/commentaire	Il convient de modifier le 5ème paragraphe de la manière suivante: "Thus, it is for the Member State's competent authority to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."
Justification	C'est en effet l'Etat membre qui exerce son pouvoir dans le domaine de l'urbanisme et généralement pas l'autorité compétente (comme c'est le cas en France). Cela dépend de l'organisation administrative de

	l'Etat.
Traduction de courtoisie	<p>It is appropriate to modify the fifth paragraph in the following way: "Thus, it is for the Member State's competent authority to exercise its powers to prevent or correct such situations. This can be accomplished in many different ways, depending on the Member State's administrative and legal system, the coordination mechanisms and the powers vested to each competent authority."</p> <p>This is the Member State which exercises its power in urbanism matter and generally not the competent authority (which is the case in France). It depends on the State administrative organisation.</p>
response	<p>Noted</p> <p>Article will be removed.</p>

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.065(a)– Obstacles p. 39

comment	94	comment by: CAA Norway
	We suggest to make GM to AMC1-ADR.AR.C.065(a) on page 39, in order to define "shielded". Ref ICAO Doc 9137, part 6.	
response	<p>Noted</p> <p>Article will be removed.</p>	

comment	682	comment by: ADP : Aeroports de Paris					
	<table border="1"> <tr> <td>Référence: AMC1-ADR.AR.C.065</td> <td>Obstacles (a) OUTER HORIZONTAL SURFACE</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Il convient de supprimer cette AMC.</td> </tr> <tr> <td>Justification</td> <td>Il est souhaité que la surface horizontale extérieure n'entre pas dans les règles de l'AESA (partie aérodrome) car elles relèvent essentiellement de la partie ATC. De plus, les points (b) et (c) sont du ressort des CS.</td> </tr> </table>	Référence: AMC1-ADR.AR.C.065	Obstacles (a) OUTER HORIZONTAL SURFACE	Proposition/commentaire	Il convient de supprimer cette AMC.	Justification	Il est souhaité que la surface horizontale extérieure n'entre pas dans les règles de l'AESA (partie aérodrome) car elles relèvent essentiellement de la partie ATC. De plus, les points (b) et (c) sont du ressort des CS.
Référence: AMC1-ADR.AR.C.065	Obstacles (a) OUTER HORIZONTAL SURFACE						
Proposition/commentaire	Il convient de supprimer cette AMC.						
Justification	Il est souhaité que la surface horizontale extérieure n'entre pas dans les règles de l'AESA (partie aérodrome) car elles relèvent essentiellement de la partie ATC. De plus, les points (b) et (c) sont du ressort des CS.						

<p>Traduction de courtoisie</p>	<p>It is appropriate to delete this AMC. It is hoped that the outer horizontal surface would not be in the EASA rules (part aerodrome) because it falls under the ATC part. Moreover the points (b) and (c) are CS matter.</p>
<p>response</p>	<p>Accepted</p>

<p>comment</p>	<p>784 comment by: <i>Union des Aéroports français - UAF</i> Attachment #60 UAF NPA 2011-20 (B.II) AMC1-ADR.AR.C.065 Référence: AMC1-ADR.AR.C.065 Obstacles (a) OUTER HORIZONTAL SURFACE Traduction de courtoisie It is appropriate to delete this AMC. It is hoped that the outer horizontal surface would not be in the EASA rules (part aerodrome) because it falls under the ATC part. Moreover the points (b) and (c) are CS matter.</p>
<p>response</p>	<p>Accepted</p>

<p>comment</p>	<p>1015 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i> <u>1. Affected paragraphs</u> <u>Cover regulation</u></p> <ul style="list-style-type: none"> • Draft Commission Regulation - Article 8 – Obstacles - Objects (p14) <p><u>Annexes to the cover regulation</u></p> <ul style="list-style-type: none"> • ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30) • ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30) • ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31) • ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31) • Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68) <p><u>AMC/GM to the IR</u></p> <ul style="list-style-type: none"> • AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38) • AMC-GM to Annex I - AMC1-ADR.AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39) • AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles -
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- Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
 - AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
 - AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
 - AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
 - AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) — Obstacles — Objects – other objects (p41)
 - AMC-GM to Annex I - AMC5-ADR.AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
 - AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
 - AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
 - AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
 - AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
 - AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
 - AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
 - AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
 - AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
 - AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
 - AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
 - AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- **Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 – Obstacles-Objects**

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- **ADR.AR.C.070 – Confusing, misleading and hazardous lights REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND T0URBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]”

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above.”

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above.”

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

“LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]”

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator’s monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States’ mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner"*. Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome

~~in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;~~

~~(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;~~

~~(3) hazards related to human activities and land use in order to take action as appropriate.~~

~~(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."~~

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

~~"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.~~

~~(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.~~

~~(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.~~

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2-ADR-OPS.B.075 – Obstacle restriction and removal (p166-169)~~

~~Note: these provisions are already dealt with in:~~

- ~~· CS-ADR-DSN.B.165 – Objects on runway strips (p18),~~
- ~~· CS-ADR-DSN.B.170 – Non-precision approach and non-instrument runway strips (p19),~~
- ~~· CS-ADR-DSN.J.475 – Non-precision approach runways (p45),~~
- ~~· CS-ADR-DSN.J.480 – Precision approach runways (p46),~~
- ~~· CS-ADR-DSN.J.485 – Runways meant for take-off (p47),~~
- ~~· CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Noted

With regard to AMC1-ADR.AR.C.065(a), article will be removed.

comment

1036

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC-GM to Annex I - AMC1-ADR.AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles – Elevation datum (p39)

2. Justification and proposed text / comment

This obstacle limitation surface is not binding in France and comes from an ICAO Manual introduced by a note in Annexe 14 Volume 1.

Besides, preventing the erection of obstacles outside the OLS is no more an aerodrome matter, but instead an ATM matter and for that objective France has endorsed a law making DGAC systemically consulted for every construction above 50 meters high outside towns, and 100 meters high inside towns. This law is far more efficient than the Outer horizontal surface.

Note. This comment is consistent with DGAC's comment on Book III on

the same subject for the aerodrome operator.
Moreover, the safeguarding of the surrounding of an aerodrome is done relying on what is in the certification basis of this aerodrome, where all the needed obstacle limitation surfaces are defined for this aerodrome. Thus the provisions on outer horizontal surface and elevation datum are not needed and even are very much confusing in part AR of the implementing rules and AMCs/GMs. Thus they should be deleted from this part.

~~AMC1-ADR.AR.C.065—Obstacles (a)~~

~~"OUTER HORIZONTAL SURFACE
[...]."~~

~~AMC2-ADR.AR.C.065(a)—Obstacles~~

~~"ELEVATION DATUM
[...]."~~

response Accepted

comment 1136 comment by: Danish Transport Authority

(c):
The term "..... is shielded by an existing immovable object" should be explained by a GM or a reference to ICAO Doc 9137, part 6.

response Noted

Article will be removed.

comment 1676 comment by: Aéroport de Marseille - MRS/LFML

It is appropriate to delete this AMC.
It is hoped that the outer horizontal surface would not be in the EASA rules (part aerodrome) because it falls under the ATC part.
Moreover the points (b) and (c) are CS matter.

response Accepted

comment 1703 comment by: ENAC Ente Nazionale per l'Aviazione Civile

It's necessary to give a definition of "immovable object"

response Noted

comment 1848 comment by: Aéroport Nantes Atlantique - NTE/LFRS

Attachment [#61](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.AR.C.065

Référence: AMC1-ADR.AR.C.065
Obstacles (a)
OUTER HORIZONTAL SURFACE

Traduction de courtoisie
It is appropriate to delete this AMC.

It is hoped that the outer horizontal surface would not be in the EASA rules (part aerodrome) because it falls under the ATC part. Moreover the points (b) and (c) are CS matter.

response Accepted

comment 2051 comment by: AENA - Aeropuertos Españoles y Navegación Aérea

This obstacle limitation surface is not binding in Spain and comes from an ICAO Manual introduced by a note in Annexe 14 Volume 1. Besides, preventing the erection of obstacles outside the OLS is no more an aerodrome matter, but instead an ATM matter.

Moreover, the safeguarding of the surrounding of an aerodrome is done relying on what is in the certification basis of this aerodrome, where all the needed obstacle limitation surfaces are defined for this aerodrome. Thus the provisions on outer horizontal surface and elevation datum are not needed and even are very much confusing in part AR of the implementing rules and AMCs/GMs. Thus they should be deleted from this part.

~~AMC1-ADR.AR.C.065—Obstacles (a)~~
~~"OUTER HORIZONTAL SURFACE~~
~~[...]."~~

response Accepted

comment 2310 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence: AMC1-ADR.AR.C.065	Obstacles (a) OUTER HORIZONTAL SURFACE
Proposition/commentaire	Il convient de supprimer cette AMC.
Justification	Il est souhaité que la surface horizontale extérieure n'entre pas dans les règles de l'AESA (partie aérodrome) car elles relèvent essentiellement de la partie ATC. De plus, les points (b) et (c) sont du ressort des CS.
Traduction de courtoisie	It is appropriate to delete this AMC. It is hoped that the outer horizontal surface would not be in the EASA rules (part aerodrome) because it falls under the ATC part. Moreover the points (b) and (c) are CS matter.

response Accepted

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC2-ADR.AR.C.065(a) – Obstacles p. 39

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- Annex III - ADR-OPS.B.075 – Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 – Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) – Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) – Obstacles – Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) – Obstacles – Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) – Obstacles – Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) – Obstacles – Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) – Obstacles – Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) – Obstacles – Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) –Obstacles – Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) – Obstacles – Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) – Confusing,

- misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR.AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that

sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters.”

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

“The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a).”

- **ADR.AR.C.080 – Other activities**

“The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated.”

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

“WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]”

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8-ADR-OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Noted

With regard to AMC2-ADR.AR.C.065(a), article will be removed.

comment

1036 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC-GM to Annex I - AMC1-ADR.AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles - Elevation datum (p39)

2. Justification and proposed text / comment

This obstacle limitation surface is not binding in France and comes from an ICAO Manual introduced by a note in Annexe 14 Volume 1.

Besides, preventing the erection of obstacles outside the OLS is no more an aerodrome matter, but instead an ATM matter and for that objective France has endorsed a law making DGAC systemically consulted for every construction above 50 meters high outside towns, and 100 meters high inside towns. This law is far more efficient than the Outer horizontal surface.

Note. This comment is consistent with DGAC's comment on Book III on the same subject for the aerodrome operator.

Moreover, the safeguarding of the surrounding of an aerodrome is done relying on what is in the certification basis of this aerodrome, where all the needed obstacle limitation surfaces are defined for this aerodrome. Thus the provisions on outer horizontal surface and elevation datum are not needed and even are very much confusing in part AR of the implementing rules and AMCs/GMs. Thus they should be deleted from this part.

~~**AMC1-ADR.AR.C.065 — Obstacles (a)**~~

~~"OUTER HORIZONTAL SURFACE~~

~~[...]."~~

~~**AMC2-ADR.AR.C.065(a) — Obstacles**~~

~~"ELEVATION DATUM~~

~~[...]."~~

response

Accepted

comment

2052

comment by: AENA - Aeropuertos Españoles y Navegación Aérea

This obstacle limitation surface is not binding in Spain and comes from an ICAO Manual introduced by a note in Annexe 14 Volume 1.

Besides, preventing the erection of obstacles outside the OLS is no more

an aerodrome matter, but instead an ATM matter.

Moreover, the safeguarding of the surrounding of an aerodrome is done relying on what is in the certification basis of this aerodrome, where all the needed obstacle limitation surfaces are defined for this aerodrome. Thus the provisions on outer horizontal surface and elevation datum are not needed and even are very much confusing in part AR of the implementing rules and AMCs/GMs. Thus they should be deleted from this part.

~~**AMC2-ADR.AR.C.065(a) — Obstacles**~~
~~"ELEVATION DATUM~~
~~[...]."~~

response Accepted

NPA 2011-20 (B.II) — AMC/GM to ANNEX I — Part Authority Requirements (Part-AR) — SUBPART C — OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) — AMC1-ADR.AR.C.065(a) — Obstacles — Objects p. 39

comment 126 comment by: CAA-NL
 In these articles there is an inconsistency in the use of the words 'aeroplanes' and 'aircraft'. We suggest to use aircraft in all cases.

response Accepted

comment 417 comment by: Estonian CAA
 We suggest to make GM to AMC1-ADR.AR.C.065(a) on page 39, in order to define "shielded". Ref ICAO Doc 9137, part 6.

response Noted
 Article will be removed.

comment 456 comment by: Icelandic Civil Aviation Administration
 We suggest to make GM to AMC1-ADR.AR.C.065(a) on page 39, in order to define "shielded". Ref ICAO Doc 9137, part 6.

response Noted
 Article will be removed.

comment 654 comment by: Finnish Transport Safety Agency
 We suggest to make GM to AMC1-ADR.AR.C.065(a) on page 39, in order to define "shielded". Ref ICAO Doc 9137, part 6.

response Noted

Article will be removed.

comment

679

comment by: *Airport Nuremberg - NUE/EDDN*

By implementing ICAO Annex 14 Standard (a -4.2.3) and recommendation (b-4.2.4) the intention of the regulation is doubtful. Since within the Annex 14 standard and recommendation function according to the either/or principle, they should not be listed in the AMC parallelly. Should it be the case that only one of the three mentioned sub-paragraphs has to be fulfilled, it requires further clarification.

response

Noted

Article will be removed.

comment

1015 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I – AMC2-ADR-AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I – AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I – AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I – AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I – AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)

- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done “without prejudice to the system and legal provisions of the Member State”. This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

“(a) The competent authority *or other authorities of the Member State shall:*

[...]

(2) *not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system*

and legal provisions of the Member State;
(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- **ADR.AR.C.070 – Confusing, misleading and hazardous lights
REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065
(b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) *The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.
[...]*

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

*"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT
[...]*

*(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."*

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

*"LIGHTS WHICH MAY CAUSE CONFUSION
[...]*

*(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."*

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

*(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:
[...]"*

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that

these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner"*. Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human

activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

~~Note: these provisions are already dealt with in:~~

- ~~· CS-ADR-DSN.B.165 — Objects on runway strips (p18),~~
- ~~· CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),~~
- ~~· CS-ADR-DSN.J.475 — Non-precision approach runways (p45),~~
- ~~· CS-ADR-DSN.J.480 — Precision approach runways (p46),~~
- ~~· CS-ADR-DSN.J.485 — Runways meant for take-off (p47),~~
- ~~· CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an**~~

~~**approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146).

~~**AMC7-ADR-OPS.B.075 – Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).

~~**AMC8-ADR-OPS.B.075 – Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 – Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 – Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 – Lighting of objects (p150).

response

Noted

With regard to AMC1-ADR.AR.C.065(a), article will be removed.

comment

1039

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) – Obstacles – Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) – Obstacles – Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) – Obstacles – Objects – precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) – Obstacles – Objects – runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) – Obstacles – Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR.AR.C.065(a) – Obstacles – Objects – obstacle protection surface for visual approach slope indicator systems (p41)

2. Justification and proposed text / comment

* Acceptable means of compliance from *AMC1-ADR.AR.C.065(a) – Obstacles – Objects (p39)* to *AMC1-ADR-AR.C.065(b);(c) – Obstacles – Objects (p41)* follow the principles aforementioned if it is understood that some adjustments are possible.

Indeed, it is systemically a case by case study and some adjustments of the use of OLS may be necessary in several cases to fit the environment and the context of each aerodrome (in particular, the future development of the aerodrome is often taken into account).

* It is noticed that there are two acceptable means of compliance named "AMC1-ADR.AR.C.065(a) – Obstacles – Objects". There should be a re-numbering.

* Moreover, paragraph (b) of AMC3-ADR.AR.C.065(a) is not appropriate because there should not be a reference to a CS in an AMC of the implementing rules. Moreover, the given "obstacle free surface" is put in place only if no object reaches the 2 % (1:50) take-off climb surface i.e. is only relevant if the aerodrome has it in its certification basis.

Finally, paragraph (b) of this AMC should take into account that fact that the limitation is endorsed by authorities of the Member State that are not always the competent authority (see specific DGAC's comment on that point).

Thus the proposed change:

AMC3-ADR.AR.C.065(a) – Obstacles – Objects

"RUNWAYS MEANT FOR TAKE-OFF

[...](b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should limit the height of new objects to preserve the characteristics of an obstacle free surface if it has been established in accordance with the certification basis of the aerodrome in CS-ADR.DSN.J.485 [...]"

response

Noted

Article will be removed.

comment

1424

comment by: Swedish Transport Agency

We suggest to make GM to AMC1-ADR.AR.C.065(a) on page 39, in order to define "shielded". Ref ICAO Doc 9137, part 6.

response

Noted

Article will be removed.

comment

1958

comment by: Pau Pyrénées Airport - PUF/LFBP

It is appropriate to delete this AMC.

It is hoped that the outer horizontal surface would not be in the EASA rules (part aerodrome) because it falls under the ATC part.

Moreover the points (b) and (c) are CS matter.

response

Accepted

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.065(a) – Obstacles – Objects p. 39-40

comment

6

comment by: Finnish Transport Safety Agency

"shielded"-Definition to shielding? ICAO Doc 9137?

response

Noted

Article will be removed.

comment

127

comment by: CAA-NL

In these articles there is an inconsistency in the use of the words 'aeroplanes' and 'aircraft'. We suggest to use aircraft in all cases.

response Noted
Article will be removed.

comment 681 comment by: *Airport Nuremberg - NUE/EDDN*
By implementing ICAO Annex 14 Standard (a -4.2.10) and recommendation (b-4.2.11) the intention of the regulation is doubtful. Since within the Annex 14 standard and recommendation function according to the either/or principle, they should not be listed in the AMC parallelly. Should it be the case that only one of the three mentioned subparagraphs has to be fulfilled, it requires further clarification.

response Noted
Article will be removed.

comment 1015 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs
Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles - Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR.AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)

- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done “without prejudice to the system and legal provisions of the Member State”. This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

“(a) The competent authority **or other authorities of the Member State** shall:

[...]

(2) not permit new objects or extensions to existing objects, remove

objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

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REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065
(b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State,

without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels. [...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT [...]

*(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."*

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION [...]

*(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."*

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

*(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:*

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject

should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner"*. Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and ~~surroundings~~ within the areas defined in coordination with the competent authority:

(1) ~~obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;~~

(2) ~~marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;~~

(3) ~~hazards related to human activities and land use in order to take action as appropriate.~~

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),*
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),*
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),*
- CS-ADR-DSN.J.480 — Precision approach runways (p46),*
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),*
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)*

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8-ADR-OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Noted

With regard to AMC1-ADR.AR.C.065(a): article will be removed.

comment

1039 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects — Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects — non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles — Objects — precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) — Obstacles — Objects — runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) — Obstacles — Objects — other objects (p41)
- AMC-GM to Annex I - AMC5-ADR.AR.C.065(a) — Obstacles — Objects — obstacle protection surface for visual approach slope indicator systems (p41)

2. Justification and proposed text / comment

* Acceptable means of compliance from AMC1-ADR.AR.C.065(a) — Obstacles — Objects (p39) to AMC1-ADR-AR.C.065(b);(c) — Obstacles — Objects (p41) follow the principles aforementioned if it is understood that some adjustments are possible.

Indeed, it is systemically a case by case study and some adjustments of the use of OLS may be necessary in several cases to fit the environment and the context of each aerodrome (in particular, the future development of the aerodrome is often taken into account).

* It is noticed that there are two acceptable means of compliance named "AMC1-ADR.AR.C.065(a) — Obstacles — Objects". There should be a re-numbering.

* Moreover, paragraph (b) of AMC3-ADR.AR.C.065(a) is not appropriate because there should not be a reference to a CS in an AMC of the implementing rules. Moreover, the given "obstacle free surface" is put in

place only if no object no object reaches the 2 % (1:50) take- off climb surface i.e. is only relevant if the aerodrome has it in its certification basis. Finally, paragraph (b) of this AMC should take into account that fact that the limitation is endorsed by authorities of the Member State that are not always the competent authority (see specific DGAC's comment on that point).

Thus the proposed change:

AMC3-ADR.AR.C.065(a) – Obstacles – Objects

"RUNWAYS MEANT FOR TAKE-OFF

[...](b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should limit the height of new objects to preserve the characteristics of an obstacle free surface if it has been established in accordance with the certification basis of the aerodrome in CS-ADR.DSN.J.485 [...]"

response

Noted

Article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC2-ADR.AR.C.065(a) – Obstacles – Objects

p. 40

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- Annex III - ADR-OPS.B.075 – Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065 – Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) – Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) – Obstacles – Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) – Obstacles –

- Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I – AMC2-ADR.AR.C.065(a) – Obstacles – Objects –precision approach runways (p40)
 - AMC-GM to Annex I – AMC3-ADR.AR.C.065(a) – Obstacles – Objects –runways meant for take-off (p40)
 - AMC-GM to Annex I – AMC4-ADR.AR.C.065(a) – Obstacles – Objects – other objects (p41)
 - AMC-GM to Annex I – AMC5-ADR.AR.C.065(a) – Obstacles – Objects – obstacle protection surface for visual approach slope indicator systems (p41)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p41)
 - AMC-GM to Annex I – AMC1-ADR-AR.C.065(b);(c) –Obstacles – Objects – (p42-43)
 - AMC-GM to Annex I – AMC1-ADR-AR.C.065(b) – Obstacles – Objects (p43)
 - AMC-GM to Annex I – AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
 - AMC-GM to Annex I – AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)
 - AMC-GM to Annex I – AMC2-ADR-AR.C.070(a) – Confusing, misleading and hazardous lights (p52)
 - AMC-GM to Annex I – AMC1-ADR-AR.C.070(b) – Confusing, misleading and hazardous lights (p53)
 - AMC-GM to Annex III - AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)
 - AMC-GM to Annex III - AMC2-ADR-OPS.B.075 – Obstacle restriction and removal (p166-169)
 - AMC-GM to Annex III - AMC3-ADR-OPS.075 – Marking and lighting of obstacles (p169-170)
 - AMC-GM to Annex III - AMC4-ADR-OPS.B.075 – Obstacles that extends above a take-off climb surface (p170)
 - AMC-GM to Annex III - AMC5-ADR-OPS.B.075 – Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
 - AMC-GM to Annex III - AMC6-ADR-OPS.B.075 – Obstacles that extends above an approach or transitional Surface (p171)
 - AMC-GM to Annex III - AMC7-ADR-OPS.B.075 – Fixed obstacles above a horizontal surface (p171)
 - AMC-GM to Annex III - AMC8-ADR-OPS.B.075 – Marking of objects (p172)
 - AMC-GM to Annex III - AMC9-ADR-OPS.B.075 – Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done “without prejudice to the system and legal provisions of the Member State”. This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.
Thus the need to modify the wording of the following provisions:

- **Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 – Obstacles-Objects**

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- **ADR.AR.C.070 – Confusing, misleading and hazardous lights REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity

lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]”

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above.”

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above.”

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

“LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]”

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator’s monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States’ mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the

Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.

2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "*the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner*". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification

~~Basis of the aerodrome in order to be able to take action as appropriate;
(3) hazards related to human activities and land use in order to take action as appropriate.~~

~~(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."~~

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

~~"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.~~

~~(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.~~

~~(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.~~

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2-ADR-OPS.B.075 – Obstacle restriction and removal (p166-169)~~

~~Note: these provisions are already dealt with in:~~

- ~~· CS-ADR-DSN.B.165 – Objects on runway strips (p18),~~
- ~~· CS-ADR-DSN.B.170 – Non-precision approach and non-instrument runway strips (p19),~~
- ~~· CS-ADR-DSN.J.475 – Non-precision approach runways (p45),~~
- ~~· CS-ADR-DSN.J.480 – Precision approach runways (p46),~~
- ~~· CS-ADR-DSN.J.485 – Runways meant for take-off (p47),~~
- ~~· CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~AMC3-ADR-OPS.B.075 – Marking and lighting of obstacles (p169-170)~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).~~

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Noted

With regard to AMC2-ADR.AR.C.065(a), article will be removed.

comment

1039 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR.AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)

2. Justification and proposed text / comment

* Acceptable means of compliance from AMC1-ADR.AR.C.065(a) — Obstacles — Objects (p39) to AMC1-ADR-AR.C.065(b);(c) — Obstacles — Objects (p41) follow the principles aforementioned if it is understood that some adjustments are possible.

Indeed, it is systemically a case by case study and some adjustments of the use of OLS may be necessary in several cases to fit the environment and the context of each aerodrome (in particular, the future development of the aerodrome is often taken into account).

* It is noticed that there are two acceptable means of compliance named "AMC1-ADR.AR.C.065(a) – Obstacles – Objects". There should be a re-numbering.

* Moreover, paragraph (b) of AMC3-ADR.AR.C.065(a) is not appropriate because there should not be a reference to a CS in an AMC of the implementing rules. Moreover, the given "obstacle free surface" is put in place only if no object no object reaches the 2 % (1:50) take- off climb surface i.e. is only relevant if the aerodrome has it in its certification basis. Finally, paragraph (b) of this AMC should take into account that fact that the limitation is endorsed by authorities of the Member State that are not always the competent authority (see specific DGAC's comment on that point).

Thus the proposed change:

AMC3-ADR.AR.C.065(a) – Obstacles – Objects

"RUNWAYS MEANT FOR TAKE-OFF

[...](b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should limit the height of new objects to preserve the characteristics of an obstacle free surface if it has been established in accordance with the certification basis of the aerodrome in CS.ADR.DSN.J.485 [...]"

response

Noted

Article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC3-ADR.AR.C.065(a) – Obstacles – Objects

p. 40

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- Annex III - ADR-OPS.B.075 – Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles - Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects -precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects -runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects - other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects - obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects - wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- **Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 – Obstacles-Objects**

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- **ADR.AR.C.070 – Confusing, misleading and hazardous lights REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the

vicinity of an aerodrome are identified and mitigated.”

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

“WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]”

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above.”

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above.”

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

“LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]”

(B) The control of surroundings is dealt with through two tiers:
- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.
Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "*the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner*". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(d) The risks caused by human activities and land use which should be assessed and mitigated should include:

(1) obstacles and the possibility of induced turbulence;

(2) the use of hazardous, confusing and misleading lights;

(3) the dazzling caused by large and highly reflective surfaces;

(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;

(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."

AMC2-ADR-OPS.B.075 – Obstacle restriction and removal (p166-169)

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 – Objects on runway strips (p18),*
- CS-ADR-DSN.B.170 – Non-precision approach and non-instrument runway strips (p19),*

- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC8 ADR OPS.B.075 — Marking of objects (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Noted

With regard to AMC3-ADR.AR.C.065(a): article will be removed.

comment

1039 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects — Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects — non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles — Objects — precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) — Obstacles — Objects — runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) — Obstacles —

- Objects – other objects (p41)
- AMC-GM to Annex I – AMC5-ADR.AR.C.065(a) – Obstacles – Objects – obstacle protection surface for visual approach slope indicator systems (p41)

2. Justification and proposed text / comment

* Acceptable means of compliance from *AMC1-ADR.AR.C.065(a) – Obstacles – Objects (p39)* to *AMC1-ADR-AR.C.065(b);(c) – Obstacles – Objects (p41)* follow the principles aforementioned if it is understood that some adjustments are possible.

Indeed, it is systemically a case by case study and some adjustments of the use of OLS may be necessary in several cases to fit the environment and the context of each aerodrome (in particular, the future development of the aerodrome is often taken into account).

* It is noticed that there are two acceptable means of compliance named “AMC1-ADR.AR.C.065(a) – Obstacles – Objects”. There should be a re-numbering.

* Moreover, paragraph (b) of AMC3-ADR.AR.C.065(a) is not appropriate because there should not be a reference to a CS in an AMC of the implementing rules. Moreover, the given “obstacle free surface” is put in place only if no object no object reaches the 2 % (1:50) take- off climb surface i.e. is only relevant if the aerodrome has it in its certification basis. Finally, paragraph (b) of this AMC should take into account that fact that the limitation is endorsed by authorities of the Member State that are not always the competent authority (see specific DGAC’s comment on that point).

Thus the proposed change:

AMC3-ADR.AR.C.065(a) – Obstacles – Objects

“*RUNWAYS MEANT FOR TAKE-OFF*

[...](b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should limit the height of new objects to preserve the characteristics of an obstacle free surface if it has been established in accordance with the certification basis of the aerodrome in CS.ADR.DSN.J.485 [...]”

response

Noted

Article will be removed.

comment

1505

comment by: ECA - European Cockpit Association

Change as follows:

(b) The competent authority should limit the height of new objects to preserve the characteristics of an obstacle free surface established in accordance with in CS.ADR.DSN.J.485

Justification:

Editorial comment

response

Noted

Article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC4-ADR.AR.C.065(a) – Obstacles – Objects p. 41

comment 128 comment by: CAA-NL
In these articles there is an inconsistency in the use of the words 'aeroplanes' and 'aircraft'. We suggest to use aircraft in all cases.

response Noted
Article will be removed.

comment 1015 ❖ comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs
Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- Annex III - ADR-OPS.B.075 – Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 – Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) – Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) – Obstacles – Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) – Obstacles – Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) – Obstacles – Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) – Obstacles – Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) – Obstacles – Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) – Obstacles – Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) – Obstacles –

- Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
 - AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
 - AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
 - AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
 - AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
 - AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
 - AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
 - AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
 - AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
 - AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
 - AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
 - AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done “without prejudice to the system and legal provisions of the Member State”. This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

“(a) The competent authority **or other authorities of the Member State** shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in

accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- **ADR.AR.C.070 – Confusing, misleading and hazardous lights
REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065
(b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe

medium-intensity flashing red lights instead of white lights. [...]
(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels. [...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT [...]

*(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."*

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION [...]

*(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."*

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

*(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters: [...]"*

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should

not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "*the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner*". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the

changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8-ADR-OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Noted

With regard to AMC4-ADR.AR.C.065(a), article will be removed.

comment

1039 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects — Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects — non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles — Objects — precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) — Obstacles — Objects — runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) — Obstacles — Objects — other objects (p41)
- AMC-GM to Annex I - AMC5-ADR.AR.C.065(a) — Obstacles — Objects — obstacle protection surface for visual approach slope indicator systems (p41)

2. Justification and proposed text / comment

* Acceptable means of compliance from AMC1-ADR.AR.C.065(a) — Obstacles — Objects (p39) to AMC1-ADR-AR.C.065(b);(c) — Obstacles — Objects (p41) follow the principles aforementioned if it is understood that some adjustments are possible.

Indeed, it is systemically a case by case study and some adjustments of the use of OLS may be necessary in several cases to fit the environment and the context of each aerodrome (in particular, the future development of the aerodrome is often taken into account).

* It is noticed that there are two acceptable means of compliance named "AMC1-ADR.AR.C.065(a) — Obstacles — Objects". There should be a re-numbering.

* Moreover, paragraph (b) of AMC3-ADR.AR.C.065(a) is not appropriate because there should not be a reference to a CS in an AMC of the implementing rules. Moreover, the given "obstacle free surface" is put in place only if no object no object reaches the 2 % (1:50) take- off climb

surface i.e. is only relevant if the aerodrome has it in its certification basis. Finally, paragraph (b) of this AMC should take into account that fact that the limitation is endorsed by authorities of the Member State that are not always the competent authority (see specific DGAC's comment on that point).

Thus the proposed change:

AMC3-ADR.AR.C.065(a) – Obstacles – Objects

"RUNWAYS MEANT FOR TAKE-OFF

[...](b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should limit the height of new objects to preserve the characteristics of an obstacle free surface if it has been established in accordance with the certification basis of the aerodrome in CS-ADR.DSN.J.485 [...]"

response

Noted

Article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC5-ADR.AR.C.065(a) – Obstacles – Objects

p. 41

comment

129

comment by: CAA-NL

In these articles there is an inconsistency in the use of the words 'aeroplanes' and 'aircraft'. We suggest to use aircraft in all cases.

response

Noted

Article will be removed.

comment

713

comment by: Airport Nuremberg - NUE/EDDN

(a) The text should be adapted according to Annex 14 - 5.3.5.43: New objects or extensions of existing objects shall not be permitted above an obstacle protection surface except when, in the opinion of the appropriate authority, the new object or extension would be shielded by an existing immovable object.

-> the phrase **above an obstacle protection surface** is misleading because it is used twice.

response

Noted

Article will be removed.

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that

- extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- ADR.AR.C.075 — Protection of communication, navigation

and surveillance systems

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

- (a) establish protection areas for each aeronautical communications, navigation and surveillance system;
- (b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

*(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."*

- Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

*(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:*

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with*

at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

~~(3) hazards related to human activities and land use in order to take action as appropriate.~~

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;
(3) the dazzling caused by large and highly reflective surfaces;
(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;
(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

~~Note: these provisions are already dealt with in:~~

- ~~· CS-ADR-DSN.B.165 — Objects on runway strips (p18),~~
- ~~· CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),~~
- ~~· CS-ADR-DSN.J.475 — Non-precision approach runways (p45),~~
- ~~· CS-ADR-DSN.J.480 — Precision approach runways (p46),~~
- ~~· CS-ADR-DSN.J.485 — Runways meant for take-off (p47),~~
- ~~· CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).~~

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).~~

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).~~

response

Noted

With regard to AMC5-ADR.AR.C.065(a): article will be removed.

comment

1039 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR.AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)

2. Justification and proposed text / comment

* Acceptable means of compliance from *AMC1-ADR.AR.C.065(a) — Obstacles — Objects (p39)* to *AMC1-ADR-AR.C.065(b);(c) — Obstacles — Objects (p41)* follow the principles aforementioned if it is understood that some adjustments are possible.

Indeed, it is systemically a case by case study and some adjustments of the use of OLS may be necessary in several cases to fit the environment and the context of each aerodrome (in particular, the future development of the aerodrome is often taken into account).

* It is noticed that there are two acceptable means of compliance named "AMC1-ADR.AR.C.065(a) — Obstacles — Objects". There should be a re-numbering.

* Moreover, paragraph (b) of AMC3-ADR.AR.C.065(a) is not appropriate because there should not be a reference to a CS in an AMC of the implementing rules. Moreover, the given "obstacle free surface" is put in place only if no object no object reaches the 2 % (1:50) take- off climb surface i.e. is only relevant if the aerodrome has it in its certification basis. Finally, paragraph (b) of this AMC should take into account that fact that the limitation is endorsed by authorities of the Member State that are not always the competent authority (see specific DGAC's comment on that point).

Thus the proposed change:

AMC3-ADR.AR.C.065(a) — Obstacles — Objects

"RUNWAYS MEANT FOR TAKE-OFF

[...](b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should limit the height of new objects † to preserve the characteristics of an obstacle free surface if it has been established in accordance with the certification basis of the aerodrome in CS.ADR.DSN.J.485 [...]"

response

Noted

Article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR-AR.C.065 (b);(c) – Obstacles – Objects p. 41-42

comment 58 comment by: *CAA Norway*
AMC1-ADR-AR.C.065 (b);(c) on p. 42 has the same numbering as the previous AMC on p 41.

response Noted
Article will be removed.

comment 95 comment by: *CAA Norway*
AMC1-ADR-AR.C.065 (b);(c), (d) on page 42 should be removed unless EASA is given the competency to regulate how to mark obstacles beyond the limits of the obstacle limitation surfaces/aerodrome. If not removed: check the content more closely and revise as necessary.

response Accepted
Article will be removed.

comment 96 comment by: *CAA Norway*
Editorial: AMC1-ADR-AR.C.065 (b);(c) on page 42 has the same numbering as the previous AMC on page 41.

response Noted
Article will be removed.

comment 418 comment by: *Estonian CAA*
"AMC1-ADR-AR.C.065 (b);(c), (d) on page 42 should be removed unless EASA is given the competency to regulate how to mark obstacles beyond the limits of the obstacle limitation surfaces/aerodrome. If not removed: check the content more closely and revise as necessary."

response Noted
Article will be removed.

comment 459 comment by: *Icelandic Civil Aviation Administration*
AMC1-ADR-AR.C.065 (b);(c), (d) on page 42 should be removed unless EASA is given the competency to regulate how to mark obstacles beyond the limits of the obstacle limitation surfaces/aerodrome. If not removed: check the content more closely and revise as necessary.

response Noted
Article will be removed.

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)

- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State,

without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

*(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."*

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions

related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in

coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC8 ADR OPS.B.075 — Marking of objects (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 – Lighting of objects (p150).

response

Noted

With regard to AMC1-ADR.AR.C.065(b)(c), article will be removed.

comment

1026

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (c) (p30)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p41)

2. Justification and proposed text / comment

This comment is linked with comment 1307 in book I.

Paragraph 2 of Article 8, Paragraph (c) of ADR.AR.C.065 and AMC1-ADR-AR.C.065 (b);(c) (page 41) deal with areas beyond the obstacle limitation surfaces which is out of the scope of application of Implementing Rules for aerodromes as it is part of the airspace regulation (obstacles beyond the OLS are ATM matters). Thus DGAC proposes to delete them.

Article 8 – Obstacles – Objects

~~“[...]2. Member States shall ensure that the competent authority is consulted with regard to proposed constructions beyond the limits of the obstacle limitation surfaces, established by the competent authority in accordance with this Regulation, and which extend above a height established by that authority.”~~

ADR.AR.C.065 – Obstacles-Objects

~~“[...] (c) The competent authority shall ensure that an aeronautical study is conducted to determine the effect on the operation of aircraft by constructions, beyond the limits of the obstacle limitation surfaces, established in accordance with paragraph (a), and which extend above a height established by that authority.~~

~~In areas beyond the limits of the obstacle limitation surfaces, at least those objects which extend to a height of 150 m or more above ground elevation shall be regarded as obstacles, unless an aeronautical study indicates that they do not constitute a hazard to aircraft.”~~

~~AMC1-ADR-AR.C.065 (b);(c) – Obstacles – Objects “OBSTACLES BEYOND THE OBSTACLE LIMITATION SURFACES”~~

response

Noted

With regard to AMC1-ADR.AR.C.065(b)(c): article will be removed.

comment

1139

comment by: Danish Transport Authority

Editorial: AMC1-ADR-AR.C.065 (b);(c) on page 42 has the same numbering as the previous AMC on page 41.

response

Noted

Article will be removed.

comment 1152 comment by: *Cologne/Bonn Airport*

response Noted

comment 1187 comment by: *Federal Office of Civil Aviation FOCA*

AMC1-ADR-AR.C.065 (b); (c):

1 According to the scope in the executive summary, this NPA covers aerodromes only, what means that the NPA is not applicable for obstacles beyond the obstacle limitation surfaces.

2. Move the chapters "OBSTACLE BEYOND THE LIMITATION SURFACES", "OBSTACLES INSIDE THE LIMITATION SURFACES AND OUTSIDE THE AERODROME", "LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR" and "WIND TURBINES" to the CS ADR DSN BOOK1 Chapter Q "Visual aids for denoting obstacles". The specifications of markings and lightings of a obstacle should be regulated only in one place. At the moment, different tables and figures exist in the AMC/GM and in the CS chapter as well.

AMC1-ADR-AR.C.065 (b); (c); (d): Please define exemptions according the obstacle protection surface. The obstacle protection surface should have the same exemptions as the obstacle limitation surfaces in para (a).

AMC1-ADR-AR.C.065 (b); Figure 1: Please change reference "See 6.3.12" to "AMC1-ADR-AR.C.065 (b) (2)". The ICAO reference is used instead to the AMC/GM reference.

AMC1-ADR-AR.C.065 (b); Table 2: Change reference a) in Table 2. The definition for using blue lights is missing. ICAO Chapter 6.3.25: "Low-intensity obstacle lights, Type C, displayed on vehicles associated with emergency or security shall be flashing-blue and those displayed on other vehicles shall be flashing-yellow."

AMC1-ADR-AR.C.065 (b): Indicate source of the definition of a wind farm "group of five or more wind turbines". Among the States, there is probably no clear definition of the minimum numbers of wind turbines that will represent a wind farm.

response Noted

Article will be removed.

comment 2259 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*

Define exemptions according the obstacle protection surface, should be the same as the obstacle limitation surface.

response Noted

Article will be removed.

comment	2260	comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i>
	Move the Chapters "OBSTACLE BEYOND THE LIMITATION SURFACES", "OBSTACLES INSIDE THE LIMITATION SURFACES AND OUTSIDE THE AERODROME", "LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR" and "WIND TURBINES" to the CS ADR DSN BOOK1 Chapter Q "Visual aids for denoting obstacles"	
response	Noted Article will be removed.	

comment	2262	comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i>
	According to the executive summary, this NPA covers only aerodromes, which means that the NPA does not apply to obstacles beyond the obstacle limitation surfaces	
response	Noted Article will be removed.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR-AR.C.065(b);(c) – Obstacles – Objects	p. 42-43
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comment	460	comment by: <i>Icelandic Civil Aviation Administration</i>
	Editorial: AMC1-ADR-AR.C.065 (b);(c) on page 42 has the same numbering as the previous AMC on page 41.	
response	Noted Article will be removed.	

comment	655	comment by: <i>Finnish Transport Safety Agency</i>
	Editorial: AMC1-ADR-AR.C.065 (b);(c) on page 42 has the same numbering as the previous AMC on page 41.	
response	Noted Article will be removed.	

comment	1015 ❖	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u> <u>Cover regulation</u> <ul style="list-style-type: none">• Draft Commission Regulation - Article 8 – Obstacles - Objects (p14) <u>Annexes to the cover regulation</u>	

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles - Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects -precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects -runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects - other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects - obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects - wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)

- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- ADR.AR.C.075 — Protection of communication, navigation and surveillance systems

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TŒURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

*(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."*

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

*(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."*

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing,**

misleading and hazardous lights

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

*(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:*

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner"*. Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated

with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(d) The risks caused by human activities and land use which should be assessed and mitigated should include:

(1) obstacles and the possibility of induced turbulence;

(2) the use of hazardous, confusing and misleading lights;

(3) the dazzling caused by large and highly reflective surfaces;

(4) sources of non visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~**AMC3-ADR-OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC4-ADR-OPS.B.075 — Obstacles that extends above a take off climb surface (p170)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8-ADR-OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Noted

With regard to AMC1-ADR-AR.C.065(b);(c), article will be removed.

comment

1034

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects - paragraph (b) (p30)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)

2. Justification and proposed text / comment

This comment is linked with comment 1309 in book I.

* Within the boundaries of the aerodrome, marking and/or lighting of obstacles are the aerodrome operator's task and not the competent authority's one, and are dealt with in the certification basis of the aerodrome. All the requirements for making and/or lighting of obstacles within the boundaries of the aerodrome are in book III - *certification specifications* only. Thus, ADR.AR.C.065 and the corresponding AMCs and GMs are applicable to objects outside the boundaries of the aerodrome only.

In this context, outside the boundaries of the aerodrome, the rules are to be harmonized with the rules defined in the certification basis of the aerodrome.

Moreover, it is essential to take into account the need for flexibility since the marking and lighting may differ from the standard certification specifications according to local condition (marking and lighting of obstacles is often determined on a case by case basis since it strongly depends on local conditions). That's why it is proposed to indicate in ADR.AR.C.065 that the impact of the object on the safety of aircraft operations around the aerodrome has to be taken into account.

In addition to that, it is essential to limit the application of the rules of part AR to the areas protected by the obstacle limitation surfaces established in the certification basis of the aerodrome. The objects beyond the OLS are ATM matters only.

Thus ADR.AR.C.065 and the corresponding AMCs are applicable to objects outside the boundaries of the aerodrome and inside the areas protected by the obstacle limitation surfaces defined in the certification basis of the aerodrome (see proposed paragraph (b) of ADR.AR.C.065 below).

* Concerning the competency for the control of obstacles outside the aerodrome boundaries, neither the aerodrome operator nor the competent authority has the legal power to make marking and/or lighting requirements mandatory to third parties: only the Member State has the legal power. This point is critical for DGAC and can be solved through two possibilities:

- either by referring to the Member State instead of the competent authority,
- or by indicating that the control of obstacles is done by the competent authority without prejudice to the system and legal provisions of the Member State (see proposed paragraph (b) of ADR.AR.C.065 below).

ADR.AR.C.065 — Obstacles-Objects

"[...] (b) outside the boundaries of the aerodrome and within the areas protected by the obstacle limitation surfaces defined in the certification basis of the aerodrome, The competent authority or other authorities of

the Member State, without prejudice to the system and legal provisions of the Member State, shall ensure that individual objects or constructions are marked and/or lighted, as appropriate, taking into account the impact of the object on the safety of aircraft operations around the aerodrome and in accordance with the Certification Specifications issued harmonizing with the marking and lighting of obstacles specifications defined in the Certification Basis notified by the competent authority. [...]"

* The obstacles to be marked and/or lighted are determined via AMC1-ADR-AR.C.065(b);(c) – Obstacles – Objects (pages 42-43) whose title is to be changed to delete "(c)" which has been deleted since it deal with objects beyond the OLS, and figures 1 and 2.

The lighting of objects is determined via AMC1-ADR-AR.C.065(b) "LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR" and in table 2. This AMC should yet be re-numbered to AMC2-ADR-AR.C.065(b).

But the actual rules in Part AR don't provide for the determination of the marking of objects outside the boundaries of the aerodrome. Thus DGAC proposes to add an AMC including the specifications for the marking of objects that are in the actual CS-ADR-DSN.Q.845 – Marking of objects (p148-149 of Book III of the NPA). Figure Q-1 of book III is also needed and added as "Figure 3" (see below) as figures 1 and 2 already exist in book I.

AMC1-ADR-AR.C.065(b);(e) – Obstacles – Objects

"OBSTACLES INSIDE THE OBSTACLE LIMITATION SURFACES AND OUTSIDE THE AERODROME..."

AMC2-ADR-AR.C.065(b) – Obstacles – Objects

"LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR..."

AMC3-ADR-AR.C.065(b) – Obstacles – Objects

"(a) All fixed objects to be marked should, whenever practicable, be coloured, but, if this is not practicable, markers or flags should be displayed on or above them, except that objects that are sufficiently conspicuous by their shape, size or colour need not be otherwise marked.

(b) Use of colours

(1) An object should be coloured to show a chequered pattern if it has essentially unbroken surfaces and its projection on any vertical plane equals or exceeds 4.5 m in both dimensions. The pattern should consist of rectangles of not less than 1.5 m and not more than 3 m on a side, the corners being of the darker colour. The colours of the pattern should contrast each with the other and with the background against which they will be seen.

(2) An object should be coloured to show alternating contrasting bands if:
(i) it has essentially unbroken surfaces and has one dimension, horizontal or vertical, greater than 1.5 m, and the other dimension, horizontal or vertical, less than 4.5m; or
(ii) it is of skeletal type with either a vertical or a horizontal dimension greater than 1.5m.

(3) The bands should be perpendicular to the longest dimension and have a width approximately 1/7 of the longest dimension or 30 m, whichever is less. The colours of the bands should contrast with the background against which they will be seen. Orange and white should be used, except where such colours are not conspicuous when viewed against the background.

The bands on the extremities of the object should be of the darker colour, see Figures 1 and 3.

(4) An object should be coloured in a single conspicuous colour if its projection on any vertical plane has both dimensions less than 1.5 m. Orange or red should be used, except where such colours merge with the background.

(c) Use of markers:

(1) Markers displayed on or adjacent to objects should be located in conspicuous positions so as to retain the general definition of the object and should be recognisable in clear weather from a distance of at least 1 000 m for an object to be viewed from the air and 300 m for an object to be viewed from the ground in all directions in which an aircraft is likely to approach the object. The shape of markers should be distinctive to the extent necessary to ensure that they are not mistaken for markers employed to convey other information, and they should be such that the hazard presented by the object they mark is not increased.

(2) Marker displayed on an overhead wire, cable, etc., should be spherical and have a diameter of not less than 60 cm.

(3) The spacing between two consecutive markers or between a marker and a supporting tower should be appropriate to the diameter of the marker. The spacing should normally not exceed 30 m where the marker diameter is 60 cm, increasing progressively with increase of the marker diameter to:

(A) 35 m where the marker diameter is 80 cm; and

(B) further progressive increases to a maximum of 40 m where the marker diameter is of at least 130 cm.

Where multiple wires, cables, etc., are involved, a marker should be located not lower than the level of the highest wire at the point marked.

(4) A marker should be of one colour. When installed, white and red, or white and orange markers should be displayed alternately. The colour selected should contrast with the background against which it will be seen.

(d) Use of flags

(1) Flags used to mark objects should be displayed around, on top of, or around the highest edge of, the object. When flags are used to mark extensive objects or groups of closely spaced objects, they should be displayed at least every 15 m. Flags should not increase the hazard presented by the object they mark.

(2) Flags used to mark fixed objects should not be less than 0.6 m square.

(3) Flags used to mark fixed objects should be orange in colour or a combination of two triangular sections, one orange and the other white, or one red and the other white, except that where such colours merge with the background, other conspicuous colours should be used.

Figure 3"

response

Noted

With regard to AMC1-ADR-AR.C.065(b);(c) : article will be removed.

comment

1425

comment by: Swedish Transport Agency

AMC1-ADR-AR.C.065 (b);(c), (d) on page 42 should be removed unless EASA is given the competency to regulate how to mark obstacles beyond the limits of the obstacle limitation surfaces/aerodrome. If not removed: check the content more closely and revise as necessary.

response

Noted

Article will be removed.

comment 1426 comment by: *Swedish Transport Agency*
Editorial: AMC1-ADR-AR.C.065 (b);(c) on page 42 has the same numbering as the previous AMC on page 41.

response Accepted

comment 1501 comment by: *Geneva International Airport (ROMIG)*
Change heading to "Lighting of Objects outside the Aerodrome boundary"
More precise

response Noted
Article will be removed.

comment 1834 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*
Attachment [#62](#)
ADBM - NPA 2011-20 (B.II) AMC1-ADR.AR.C.065

Référence:	AMC1-ADR.AR.C.065
Obstacles	(a)
OUTER	HORIZONTAL SURFACE

Traduction de courtoisie
It is appropriate to delete this AMC.
It is hoped that the outer horizontal surface would not be in the EASA rules (part aerodrome) because it falls under the ATC part. Moreover the points (b) and (c) are CS matter.

response Accepted

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR-AR.C.065(b) – Obstacles - Objects p. 43-50

comment 11 comment by: *ACI EUROPE - Airports Council International*
change heading to "Lighting of Objects outside the Aerodrome boundary"
Justification: more precise

response *Noted*
Article will be removed.

comment 97 comment by: *CAA Norway*

The headline of AMC1-ADR-AR.C.065 (b) on page 43 indicates lighting of objects outside the area controlled by the aerodrome operator, but the paragraph includes requirements for obstacles inside the aerodrome and has to be totally rearranged. Perhaps even **deleted**, bearing in mind whether EASA is given the competence to regulate **how** to mark obstacles beyond the limits of the obstacle limitation surfaces/aerodrome.

We cannot find marking of obstacles beyond the (lateral) limits of the aerodrome OLS's (en-route obstacles) mentioned in BR 216/2008, in 1108/2009 or in either of the ToR's for the Rule Making Groups. It has not been included in the RIA. The extension of EASA is said to cover "Aerodromes". So; one question is whether EASA is actually given the competence to regulate this. One thing is to keep the paragraph requiring the State to regulate marking of such obstacles (ADR.AR.C.065 (c)), another thing is to give requirements on how to mark them. (We also have commented the content of ADR.AR.C.065 (c), as the first part about aeronautical study is more strict than Annex 14 (4.3.1)). We cannot accept that this will affect existing obstacles that are already marked in accordance with national regulation. (There is no paragraph giving requirements or guidance in that sense). For Norway, certain requirements in the existing national regulation differ from Annex 14, and our regulation also opens up for the use of new technology. If all existing en-route obstacles are to be reassessed/remarked, this is a **big** issue both in terms of workload for the authority and in many cases also will represent **large** investments by obstacle owners. This has not been reflected in this process. If the new requirements were stated to include **new** obstacles only, giving some kind of grandfathering to the existing ones, we could better live with it, but we then need such clarification.

response

Noted
 Article will be removed.

comment

130 comment by: CAA-NL

Please change 'outside' into 'inside' in the heading. Where vehicles are addressed in this paragraph we read this as the area controlled by the aerodrome operator.

This paragraph does not contain marking specifications and color specifications (chromaticity requirements). We propose to add a reference to the certification specifications as is done in AMC1-ADR-AR.C.065 (b); (c) part (d). These specifications are essential for the recognition of an obstacle.

In (b) (7) and (8) we suggest to delete the phrase 'when technically feasible' and add the requirement 'with the spacing not exceeding 52 m' in line with ICAO Annex 14, 6.3. A lot of research has been done in the past which indicated that for the recognition of the obstacle and obstacle lighting system by air a maximal spacing of 52 m should be used where a medium-intensity obstacle light type C is applied. A spacing more than 52 meter might influence flight safety.

response

Noted

Article will be removed.
Please refer to comment No 101 to CS.

comment 335 comment by: *Brussels Airport - BRU/EBBR*
AMC1-ADR-AR.C.065(b) – Obstacles – Objects
AMC1-ADR-AR.C.065(b)(c)(3) Low-intensity obstacle lights, Type C”
Incorrect reference in Table 2.
Footnote a of Table 2 says : »See 6.3.25 ».
This is a reference to Annex 14, which was not correctly transposed in the NPA.
It should refer to AMC1-ADR-AR.C.065(b)(c)(3) Low-intensity obstacle lights, Type C.

response Noted
Article will be removed. Corrections will be made in part CS.

comment 337 comment by: *Avinor*
AMC1.ADR.AR.C.065 (b). Change heading to "Lighting of Objects outside the Aerodrome boundary".

response Noted
Article will be removed.

comment 420 comment by: *Estonian CAA*
AMC1-ADR-AR.C.065 (b) on page 43 includes requirements for obstacles inside the aerodrome and has to be totally rearranged. Perhaps even deleted, bearing in mind whether EASA is given the competency to regulate how to mark obstacles beyond the limits of the obstacle limitation surfaces/aerodrome.

response Noted
Article will be removed.

comment 461 comment by: *Icelandic Civil Aviation Administration*
The headline of AMC1-ADR-AR.C.065 (b) on page 43 indicates lighting of objects outside the area controlled by the aerodrome operator, but the paragraph includes requirements for obstacles inside the aerodrome and has to be totally rearranged. Perhaps even deleted, bearing in mind whether EASA is given the competency to regulate how to mark obstacles beyond the limits of the obstacle limitation surfaces/aerodrome. We cannot find marking of obstacles beyond the (lateral) limits of the aerodrome OLS's (en-route obstacles) mentioned in BR 216/2008, in 1108/2009 or in either of the ToR's for the Rule Making Groups. It has not been included in the RIA. The extension of EASA is said to cover

"Aerodromes". So; one question is whether EASA is actually given the competence to regulate this. One thing is to keep the paragraph requiring the State to regulate marking of such obstacles (ADR.AR.C.065 (c)), another thing is to give requirements on how to mark them. (We also have commented the content of ADR.AR.C.065 (c), as the first part about aeronautical study is more strict than Annex 14 (4.3.1)). If all existing en-route obstacles are to be reassessed/remarked, this is a big issue both in terms of workload for the authority and in many cases also will represent large investments by obstacle owners. This has not been reflected in this process. If the new requirements were stated to include new obstacles only, giving some kind of grandfathering to the existing ones, this would be acceptable.

response

Noted
Article will be removed.

comment

656 comment by: *Finnish Transport Safety Agency*
AMC1-ADR-AR.C.065 (b) on page 43 includes requirements for obstacles inside the aerodrome and has to be totally rearranged. Perhaps even deleted, bearing in mind whether EASA is given the competency to regulate how to mark obstacles beyond the limits of the obstacle limitation surfaces/aerodrome.

response

Noted
Article will be removed.

comment

683 comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR-AR.C.065(b)	Obstacles - Objects LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR
Proposition/commentaire	Question: quelle est la signification de l'aire contrôlée par l'exploitant d'aérodrome? Nombre d'éléments de cette AMC devraient être dans la partie CS/GM ce qui est déjà le cas pour une grande partie (exemple : figure 1 de la présente AMC, figure Q-2 de la CS-ADR-DSN.Q485...)
Justification	Nous remarquons que p.42 la réglementation se réfère à ce qui se situe en dehors des limites de l'aérodrome alors que p.43 la réglementation se réfère à tout ce qui est en dehors de l'aire contrôlée par l'exploitant d'aérodrome. Pour des raisons de cohérence, nous pensons qu'il s'agit dans les deux hypothèses des objets situés en dehors

	des limites de l'aérodrome.
Traduction de courtoisie	<p>Question: what is the meaning of « area controlled by the aerodrome operator »?</p> <p>Many elements of this AMC should be in part CS/GM which is already the case for lots of them (example: figure 1 of the present AMC, figure Q-2 of the CS-ADR-DSN.Q485...)</p> <p>We notice that in page 42 the regulation refers to all which is situated outside the limits of the aerodrome whereas in page 43 the regulation refers to all which is outside the area controlled by the aerodrome operator.</p> <p>For reasons of coherency we think that it is about objects situated outside the limits of the aerodrome in both cases.</p>
response	<p>Noted</p> <p>Article will be removed.</p>

comment	<p>723 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>(7) Compared to Annex 14 the final information on the required spacing was omitted and should be adapted as follows:</p> <p>6.3.17 Where an object is indicated by medium-intensity obstacle lights, Type B, and the top of the object is more than 45 m above the level of the surrounding ground or the elevation of tops of nearby buildings (when the object to be marked is surrounded by buildings), additional lights shall be provided at intermediate levels. These additional intermediate lights shall be alternately low-intensity obstacle lights, Type B, and medium-intensity obstacle lights, Type B, and shall be spaced as equally as practicable between the top lights and ground level or the level of tops of nearby buildings, as appropriate, with the spacing not exceeding 52 m.</p>
response	<p>Noted</p> <p>Article will be removed. Corrections will be made in part CS.</p>

comment	<p>725 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>(8) Compared to Annex 14 the final information on the required spacing was omitted and should be adapted as follows:</p> <p>6.3.18 Where an object is indicated by medium-intensity obstacle lights, Type C, and the top of the object is more than 45 m above the level of the surrounding ground or the elevation of tops of nearby buildings (when the object to be marked is surrounded by</p>
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	buildings), additional lights shall be provided at intermediate levels. These additional intermediate lights shall be spaced as equally as practicable, between the top lights and ground level or the level of tops of nearby buildings, as appropriate, with the spacing not exceeding 52 m.			
response	Noted Article will be removed. Please refer to comment No 2781 to CS.			
comment	728	comment by: <i>Airport Nuremberg - NUE/EDDN</i>		
	Figure 1 should be adapted using the EASA references, it is still listing the reference on chapters of the ICAO Annex 14.			
response	Noted Article will be removed. Please refer to comment No 2783 to CS.			
comment	729	comment by: <i>Airport Nuremberg - NUE/EDDN</i>		
	Phrase should be changed to: "Less than 92 m AGL" to be correct.			
response	Noted Article will be removed. Corrections will be made in part CS.			
comment	734	comment by: <i>Airport Nuremberg - NUE/EDDN</i>		
	According to Annex 14, column 1, Low-intensity Type C should be changed to: Low-intensity Type C (mobile obstacle) Additionally cross-references to ICAO Annex 14 chapters at the bottom of the table should be omitted or replaced by references to the according EASA chapter.			
response	Noted Article will be removed. Corrections will be made in part CS.			
comment	785	comment by: <i>Union des Aéroports français - UAF</i>		
	Attachment #63			
	UAF	NPA	2011-20	(B.II) AMC1-ADR-AR.C.065(b)
	Référence:			AMC1-ADR-AR.C.065(b)
	Obstacles		-	Objects
	LIGHTING OF OBJECTS OUTSIDE THE AERODROME			OPERATOR

Traduction de courtoisie
Question: what is the meaning of « area controlled by the aerodrome operator »?
Many elements of this AMC should be in part CS/GM which is already the case for lots of them (example: figure 1 of the present AMC, figure Q-2 of the CS-ADR-DSN.Q485...)
We notice that in page 42 the regulation refers to all which is situated outside the limits of the aerodrome whereas in page 43 the regulation refers to all which is outside the area controlled by the aerodrome operator.
For reasons of coherency we think that it is about objects situated outside the limits of the aerodrome in both cases.

response

Noted

Article will be removed.

comment

1015 ❖ comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles - Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope

- indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
 - AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
 - AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
 - AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
 - AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
 - AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
 - AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
 - AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
 - AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
 - AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
 - AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
 - AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
 - AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done “without prejudice to the system and legal provisions of the Member State”. This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

“(a) The competent authority **or other authorities of the Member State** shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- **ADR.AR.C.070 – Confusing, misleading and hazardous lights
REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065
(b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.
[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT
[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION
[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:
[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.

2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "*the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner*". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and ~~surroundings~~ within the areas defined in coordination with the competent authority:

(1) ~~obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;~~

(2) ~~marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;~~

(3) ~~hazards related to human activities and land use in order to take action as appropriate.~~

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(d) The risks caused by human activities and land use which should be assessed and mitigated should include:

(1) obstacles and the possibility of induced turbulence;

(2) the use of hazardous, confusing and misleading lights;

(3) the dazzling caused by large and highly reflective surfaces;

(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;

(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."

~~AMC2 ADR OPS.B.075 – Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 – Objects on runway strips (p18),*
- CS-ADR-DSN.B.170 – Non-precision approach and non-instrument runway strips (p19),*
- CS-ADR-DSN.J.475 – Non-precision approach runways (p45),*
- CS-ADR-DSN.J.480 – Precision approach runways (p46),*
- CS-ADR-DSN.J.485 – Runways meant for take-off (p47),*
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)*

~~AMC3 ADR OPS.B.075 – Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 – Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 – Objects, other than obstacles, adjacent to a take-off climb surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 –

Objects to be marked and/or lighted (p146-147).

~~**AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8-ADR-OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Noted

With regard to AMC1-ADR-AR.C.065(b), article will be removed.

comment

1034 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects - paragraph (b) (p30)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)

2. Justification and proposed text / comment

This comment is linked with comment 1309 in book I.

* Within the boundaries of the aerodrome, marking and/or lighting of obstacles are the aerodrome operator's task and not the competent authority's one, and are dealt with in the certification basis of the aerodrome. All the requirements for making and/or lighting of obstacles within the boundaries of the aerodrome are in book III - *certification specifications* only. Thus, ADR.AR.C.065 and the corresponding AMCs and GMs are applicable to objects outside the boundaries of the aerodrome only.

In this context, outside the boundaries of the aerodrome, the rules are to be harmonized with the rules defined in the certification basis of the aerodrome.

Moreover, it is essential to take into account the need for flexibility since the marking and lighting may differ from the standard certification specifications according to local condition (marking and lighting of obstacles is often determined on a case by case basis since it strongly depends on local conditions). That's why it is proposed to indicate in ADR.AR.C.065 that the impact of the object on the safety of aircraft operations around the aerodrome has to be taken into account.

In addition to that, it is essential to limit the application of the rules of part

AR to the areas protected by the obstacle limitation surfaces established in the certification basis of the aerodrome. The objects beyond the OLS are ATM matters only.

Thus ADR.AR.C.065 and the corresponding AMCs are applicable to objects outside the boundaries of the aerodrome and inside the areas protected by the obstacle limitation surfaces defined in the certification basis of the aerodrome (see proposed paragraph (b) of ADR.AR.C.065 below).

* Concerning the competency for the control of obstacles outside the aerodrome boundaries, neither the aerodrome operator nor the competent authority has the legal power to make marking and/or lighting requirements mandatory to third parties: only the Member State has the legal power. This point is critical for DGAC and can be solved through two possibilities:

- either by referring to the Member State instead of the competent authority,
- or by indicating that the control of obstacles is done by the competent authority without prejudice to the system and legal provisions of the Member State (see proposed paragraph (b) of ADR.AR.C.065 below).

ADR.AR.C.065 – Obstacles-Objects

"[...] (b) outside the boundaries of the aerodrome and within the areas protected by the obstacle limitation surfaces defined in the certification basis of the aerodrome, The competent authority or other authorities of the Member State, without prejudice to the system and legal provisions of the Member State, shall ensure that individual objects or constructions are marked and/or lighted, as appropriate, taking into account the impact of the object on the safety of aircraft operations around the aerodrome and in accordance with the Certification Specifications issued harmonizing with the marking and lighting of obstacles specifications defined in the Certification Basis notified by the competent authority. [...]"

* The obstacles to be marked and/or lighted are determined via AMC1-ADR-AR.C.065(b);(c) – Obstacles – Objects (pages 42-43) whose title is to be changed to delete "(c)" which has been deleted since it deal with objects beyond the OLS, and figures 1 and 2.

The lighting of objects is determined via AMC1-ADR-AR.C.065(b) "LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR" and in table 2. This AMC should yet be re-numbered to AMC2-ADR-AR.C.065(b).

But the actual rules in Part AR don't provide for the determination of the marking of objects outside the boundaries of the aerodrome. Thus DGAC proposes to add an AMC including the specifications for the marking of objects that are in the actual CS-ADR-DSN.Q.845 – Marking of objects (p148-149 of Book III of the NPA). Figure Q-1 of book III is also needed and added as "Figure 3" (see below) as figures 1 and 2 already exist in book I.

AMC1-ADR-AR.C.065(b);(e) – Obstacles – Objects

"OBSTACLES INSIDE THE OBSTACLE LIMITATION SURFACES AND OUTSIDE THE AERODROME..."

AMC2-ADR-AR.C.065(b) – Obstacles – Objects

"LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE

AERODROME OPERATOR..."

AMC3-ADR-AR.C.065(b) – Obstacles – Objects

"(a) All fixed objects to be marked should, whenever practicable, be coloured, but, if this is not practicable, markers or flags should be displayed on or above them, except that objects that are sufficiently conspicuous by their shape, size or colour need not be otherwise marked.

(b) Use of colours

(1) An object should be coloured to show a chequered pattern if it has essentially unbroken surfaces and its projection on any vertical plane equals or exceeds 4.5 m in both dimensions. The pattern should consist of rectangles of not less than 1.5 m and not more than 3 m on a side, the corners being of the darker colour. The colours of the pattern should contrast each with the other and with the background against which they will be seen.

(2) An object should be coloured to show alternating contrasting bands if:
(i) it has essentially unbroken surfaces and has one dimension, horizontal or vertical, greater than 1.5 m, and the other dimension, horizontal or vertical, less than 4.5m; or
(ii) it is of skeletal type with either a vertical or a horizontal dimension greater than 1.5m.

(3) The bands should be perpendicular to the longest dimension and have a width approximately 1/7 of the longest dimension or 30 m, whichever is less. The colours of the bands should contrast with the background against which they will be seen. Orange and white should be used, except where such colours are not conspicuous when viewed against the background. The bands on the extremities of the object should be of the darker colour, see Figures 1 and 3.

(4) An object should be coloured in a single conspicuous colour if its projection on any vertical plane has both dimensions less than 1.5 m. Orange or red should be used, except where such colours merge with the background.

(c) Use of markers:

(1) Markers displayed on or adjacent to objects should be located in conspicuous positions so as to retain the general definition of the object and should be recognisable in clear weather from a distance of at least 1 000 m for an object to be viewed from the air and 300 m for an object to be viewed from the ground in all directions in which an aircraft is likely to approach the object. The shape of markers should be distinctive to the extent necessary to ensure that they are not mistaken for markers employed to convey other information, and they should be such that the hazard presented by the object they mark is not increased.

(2) Marker displayed on an overhead wire, cable, etc., should be spherical and have a diameter of not less than 60 cm.

(3) The spacing between two consecutive markers or between a marker and a supporting tower should be appropriate to the diameter of the marker. The spacing should normally not exceed 30 m where the marker diameter is 60 cm, increasing progressively with increase of the marker diameter to:

(A) 35 m where the marker diameter is 80 cm; and

(B) further progressive increases to a maximum of 40 m where the marker diameter is of at least 130 cm.

Where multiple wires, cables, etc., are involved, a marker should be located not lower than the level of the highest wire at the point marked.

(4) A marker should be of one colour. When installed, white and red, or white and orange markers should be displayed alternately. The colour

selected should contrast with the background against which it will be seen.
(d) Use of flags
(1) Flags used to mark objects should be displayed around, on top of, or around the highest edge of, the object. When flags are used to mark extensive objects or groups of closely spaced objects, they should be displayed at least every 15 m. Flags should not increase the hazard presented by the object they mark.
(2) Flags used to mark fixed objects should not be less than 0.6 m square.
(3) Flags used to mark fixed objects should be orange in colour or a combination of two triangular sections, one orange and the other white, or one red and the other white, except that where such colours merge with the background, other conspicuous colours should be used.
Figure 3"

response

Noted

With regard to AMC1-ADR-AR.C.065(b), article will be removed.

comment

1141

comment by: Danish Transport Authority

Parts of the content in the AMC doesn't comply with the headline of the paragraph. Lighting of objects outside the area controlled by the aerodrome operator and requirements regarding vehicle, follow-me vehicles ect. (a)(4) and (a)(5).The headline should be "Lighting of objects beyond the OLSs"

response

Noted

Article will be removed.

comment

1218

comment by: Belgian CAA

Wrong referencing in table 2 (a).

response

Noted

Article will be removed. Corrections will be made in part CS.

comment

1368

comment by: Euroairport Bâle-Mulhouse

Attachment [#64](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR-AR.C.065(b)

Référence: AMC1-ADR-AR.C.065(b)
Obstacles - Objects
LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE
AERODROME OPERATOR

Traduction de courtoisie
Question: what is the meaning of « area controlled by the aerodrome operator »?

Many elements of this AMC should be in part CS/GM which is already the case for lots of them (example: figure 1 of the present AMC, figure Q-2 of the CS-ADR-DSN.Q485...)

We notice that in page 42 the regulation refers to all which is situated

response	<p>outside the limits of the aerodrome whereas in page 43 the regulation refers to all which is outside the area controlled by the aerodrome operator. For reasons of coherency we think that it is about objects situated outside the limits of the aerodrome in both cases.</p> <p>Noted</p> <p>Article will be removed.</p>					
comment	<p>1427 comment by: <i>Swedish Transport Agency</i></p> <p>AMC1-ADR-AR.C.065 (b) on page 43 includes requirements for obstacles inside the aerodrome and has to be totally rearranged. Perhaps even deleted, bearing in mind whether EASA is given the competency to regulate how to mark obstacles beyond the limits of the obstacle limitation surfaces/aerodrome.</p>					
response	<p>Noted</p> <p>Article will be removed.</p>					
comment	<p>1677 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>Question: what is the meaning of « area controlled by the aerodrome operator »?</p> <p>Many elements of this AMC should be in part CS/GM which is already the case for lots of them (example: figure 1 of the present AMC, figure Q-2 of the CS-ADR-DSN.Q485...)</p> <p>We notice that in page 42 the regulation refers to all which is situated outside the limits of the aerodrome whereas in page 43 the regulation refers to all which is outside the area controlled by the aerodrome operator. For reasons of coherency we think that it is about objects situated outside the limits of the aerodrome in both cases.</p>					
response	<p>Noted</p> <p>Article will be removed.</p>					
comment	<p>1726 comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i></p> <p>change heading to: "Lighting of Objects outside the Aerodrome Boundary"</p>					
response	<p>Noted</p> <p>Article will be removed.</p>					
comment	<p>1732 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #65</p> <table border="1" data-bbox="379 1966 1414 2004"> <tr> <td>UAF</td> <td>NPA</td> <td>2011-20</td> <td>(B.II)</td> <td>AMC1-ADR-AR.C.065(b)</td> </tr> </table>	UAF	NPA	2011-20	(B.II)	AMC1-ADR-AR.C.065(b)
UAF	NPA	2011-20	(B.II)	AMC1-ADR-AR.C.065(b)		

	<p>Référence: AMC1-ADR-AR.C.065(b) Obstacles - Objects LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR</p> <p>Traduction de courtoisie Question: what is the meaning of « area controlled by the aerodrome operator »? Many elements of this AMC should be in part CS/GM which is already the case for lots of them (example: figure 1 of the present AMC, figure Q-2 of the CS-ADR-DSN.Q485...) We notice that in page 42 the regulation refers to all which is situated outside the limits of the aerodrome whereas in page 43 the regulation refers to all which is outside the area controlled by the aerodrome operator. For reasons of coherency we think that it is about objects situated outside the limits of the aerodrome in both cases.</p>
response	<p>Noted</p> <p>Article will be removed.</p>

comment	<p>1836 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #66</p> <p>ADBM - NPA 2011-20 (B.II) AMC1-ADR-AR.C.065(b)</p> <p>Référence: AMC1-ADR-AR.C.065(b) Obstacles - Objects LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR</p> <p>Traduction de courtoisie Question: what is the meaning of « area controlled by the aerodrome operator »? Many elements of this AMC should be in part CS/GM which is already the case for lots of them (example: figure 1 of the present AMC, figure Q-2 of the CS-ADR-DSN.Q485...) We notice that in page 42 the regulation refers to all which is situated outside the limits of the aerodrome whereas in page 43 the regulation refers to all which is outside the area controlled by the aerodrome operator. For reasons of coherency we think that it is about objects situated outside the limits of the aerodrome in both cases.</p>
response	<p>Noted</p> <p>Article will be removed.</p>

comment	<p>1953 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>Question: what is the meaning of « area controlled by the aerodrome operator »?</p>
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And outside these limits the aerodrome operator has no authority.

Many elements of this AMC should be in part CS/GM which is already the case for lots of them (example: figure 1 of the present AMC, figure Q-2 of the CS-ADR-DSN.Q485...)

We notice that in page 42 the regulation refers to all which is situated outside the limits of the aerodrome whereas in page 43 the regulation refers to all which is outside the area controlled by the aerodrome operator.

For reasons of coherency we think that it is about objects situated outside the limits of the aerodrome in both cases.

response

Noted
 Article will be removed.

comment

2255 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
 Change reference (a). The definition for using blue lights is missing. ICAO Chapter 6.3.25: "Low-intensity obstacle lights, Type C, displayed on vehicles associated with emergency or security shall be flashing-blue and those displayed on other vehicles shall be flashing-yellow."

response

Noted
 Article will be removed.
 Please refer to comment No. 2357 to CS.

comment

2256 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
 Change reference "See 6.3.12" into "AMC1-ADR-AR.C.065 (b) (2)"

response

Noted
 Article will be removed. Corrections will be made in part CS.

comment

2263 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
 Change heading to "Lighting of Objects outside the Aerodrome boundary"

response

Noted
 Article will be removed.

comment

2312 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

<p>Référence: AMC1-ADR-AR.C.065(b)</p>	<p>Obstacles - Objects LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR</p>
<p>Proposition/commentaire</p>	<p>Question: quelle est la signification de</p>

	<p>l'aire contrôlée par l'exploitant d'aérodrome?</p> <p>Nombre d'éléments de cette AMC devraient être dans la partie CS/GM ce qui est déjà le cas pour une grande partie (exemple : figure 1 de la présente AMC, figure Q-2 de la CS-ADR-DSN.Q485...)</p>
Justification	<p>Nous remarquons que p.42 la réglementation se réfère à ce qui se situe en dehors des limites de l'aérodrome alors que p.43 la réglementation se réfère à tout ce qui est en dehors de l'aire contrôlée par l'exploitant d'aérodrome. Pour des raisons de cohérence, nous pensons qu'il s'agit dans les deux hypothèses des objets situés en dehors des limites de l'aérodrome.</p>
Traduction de courtoisie	<p>Question: what is the meaning of « area controlled by the aerodrome operator »?</p> <p>Many elements of this AMC should be in part CS/GM which is already the case for lots of them (example: figure 1 of the present AMC, figure Q-2 of the CS-ADR-DSN.Q485...)</p> <p>We notice that in page 42 the regulation refers to all which is situated outside the limits of the aerodrome whereas in page 43 the regulation refers to all which is outside the area controlled by the aerodrome operator. For reasons of coherency we think that it is about objects situated outside the limits of the aerodrome in both cases.</p>

response Noted
 Article will be removed.

comment 2446 comment by: *Isavia*
 AMC1.ADR.AR.C.065 (b). Change heading to "Lighting of Objects outside the Aerodrome boundary".

response Noted
 Article will be removed.

comment 2527 comment by: *ADV -German Airports Association*

	AMC1.ADR.AR.C.065 (b) change heading to "Lighting of Objects outside the Aerodrome boundary" Justification: More precise
response	Noted Article will be removed.

comment	2539 comment by: <i>MST / STR - Stuttgart Airport</i> AMC1.ADR.AR.C.065 (b) change heading to "Lighting of Objects outside the Aerodrome boundary" Justification: More precise
response	Noted Article will be removed.

comment	2632 comment by: <i>Fraport AG</i> AMC1-ADR-AR.C.065(b) — Obstacles - Objects Editorial LIGHTING OF OBJECTS OUTSIDE THE AREA CONTROLLED BY THE AERODROME OPERATOR Proposed Text Lighting of Objects outside the Aerodrome boundary Fraport AG More precise
response	Noted Article will be removed.

NPA 2011-20 (B.II) — AMC/GM to ANNEX I — Part Authority Requirements (Part-AR) — SUBPART C — OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) — AMC2-ADR-AR.C.065 (b) — Obstacles - Objects — WIND TOURBINES p. 51-52
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comment	131 comment by: <i>CAA-NL</i> In (a) please delete the text 'if determined as an obstacle'. The text is redundant. In (c) (1) and (d) (3) we suggest to change the text 'five wind turbines' into 'two wind turbines'. A wind farm might consist of at least two wind turbines instead of five. When for instance three wind turbines are located
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together in a line and the distance between the outer two wind turbines does not exceed 900 meter, the wind turbine in the middle does not have to be lighted. When indicating that a wind farm should consist of at least five wind turbines, it is required that also the middle wind turbine should be equipped with obstacle lights, while there is no need for it. This will result in extra costs and complaints.

In (c) (1) (ii) we suggest to add the maximum spacing of 900 meter between wind turbines equipped with medium- intensity obstacle lights.

response

Noted

Article will be removed.

comment

153

comment by: *SER/FEE*

Lighting of a windpark may disturb people living in the neighborhood. If no direct impact on health has ever been shown, several research programs, such as the HIWUS project (Bubdesverband Windenergie, 2008) or a project conducted by the University of Wittenberg, Germany in 2010, demonstrated that lighting can create stress. The later concluded that a lighting that varied depending on the level of luminosity benefited to the general well-being of local residents.

Moreover, this type of system is already used in Germany without hampering the safety standards. It is thus requested to give the opportunity to the competent authority to enable a lighting system that varies depending on the brightness.

It is requested at (c), (1) after « obstacle lights should be used” to add: “unless the competent authority allows a system enabling the lighting intensity to vary depending on the level of brightness” and at (c) (3), either to replace “should” by “could” and “medium” by “medium or lower” or to suppress altogether: “where the highest point of the blade on the vertical position is 150m or less above ground level, medium intensity white lights should be used”. Indeed, this later sentence is not necessary since the general rule is already given in (c)(1)

response

Noted

Article will be removed.

comment

154

comment by: *SER/FEE*

France has a number of windparks that are composed of less than five wind turbines. Moreover, if a park is composed of a line of three turbines, lighting of the two wind turbines at the both ends of the line will not make a sensible difference in terms of safety as compared to the lighting of the three turbines as soon as the distance between the lights does not exceed the minimal distance . It is requested at (c), (1) and at (d) (3) either replace “five” by “three” or suppress “i.e. a group of five or more wind turbines”

response

Noted

Article will be removed.

comment	155	comment by: <i>SER/FEE</i>
	<p>Intermediate lighting can perturb people living in the neighborhood. Reducing downward radiation is a simple way of reducing the impact on them. It thus makes sense to allow it as soon as that does not affect safety standards. The intermediate lighting levels is often at around 50m above ground level. So the risk of having a helicopter or a plane below that point and thus not seeing the intermediate lights if the downward radiation is reduced is highly improbable.</p> <p>It is thus requested at (c) (4): after "intermediate lighting levels", to add: " A system can be installed in order to reduce the downward radiation".</p>	
response	Noted Article will be removed.	
comment	156	comment by: <i>SER/FEE</i>
	<p>Intermediate lighting is not deemed necessary by France aviation safety authority for wind turbines below 150m. It is thus requested to prescribe this intermediate lighting only above a given height of turbines. It is thus requested at (c)(4)(i) after "lighting levels" to add: if the highest point of the blade on the vertical position exceeds 150m above ground level."</p>	
response	Noted Article will be removed.	
comment	157	comment by: <i>SER/FEE</i>
	<p>For offshore wind turbines, the intermediate lighting should also comply with the maritime rules of marking or lighting. Intermediate lighting can perturb ships and safety helicopters. It is requested at (C)(4)(i) after "lighting levels" to add "if intermediate lighting is not already prescribed by another authority."</p>	
response	Noted Article will be removed.	
comment	296	comment by: <i>CAA Austria - Ministry of Transport</i>
	<p>The scope of EASA NPA 2011-20 are aerodromes and not en-route obstacles. Delete AMC. If not, it has to be clarified, why white painting of wind turbines are better - not mentioned in ICAO - than red markings on the mast and also at the end of rotor blades?</p>	
response	Noted Article will be removed.	
comment	743	comment by: <i>Airport Nuremberg - NUE/EDDN</i>
	<p>To avoid the mentioning of the phrase "if determined as an obstacle" twice, the wording should be adapted to:</p>	

(a) A wind turbine should be marked and/or lighted if it is determined by the competent authority to be an obstacle.

response

Noted

Article will be removed.

comment

789 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- Draft Commission Regulation - Article 3 – Oversight capabilities - paragraph 1 (p10)
- ANNEX I – Part-AR - ADR.AR.B.005(c) – Management System (p20)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (c) (p30)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.005(c) – Management System (p13)
- AMC-GM to Annex I – AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
- AMC-GM to Annex I – AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC2-ADR-AR.C.070(a) – Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC1-ADR-AR.C.070(b) – Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC/GM to ANNEX I – Part-AR - AMC1-ADR-AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES (page 37)
- CS-ADR - Book 1 - CS-ADR-DSN.A.002 – Definitions – ‘clearway’ (p5)

2. Justification and proposed text / comment

This comment is linked with comment 1008 in book I and 591 in book III. This comment is **critical** as the rules, as written presently, can not be applied in the French system, linked with the definition of “competent authority” and its related obligations. This comment is linked to the issue on responsibility (see proposal for adding Article 2bis in the Cover regulation).

This comment aims to inform EASA on how the French DGAC understands the notion of “competent authority”, and also to list the rules which can not be applied for such competent authority.

France understands the competent authority is the civil aviation authority in charge of the oversight of the aerodrome operator for the tasks mentioned in its aerodrome certificate.

To explain our comment: In France, there are regions, and representatives from the States in these regions ("préfet" in French). The local representative from the State has some responsibilities, particularly for land planning use. For example, this representative is competent on land use matters to apply the obstacle limitation surfaces and to edict rules on policy on aerodromes (e.g. defining the movement area or stating that people working on the aerodrome have to be trained). The "préfet" is not considered as a competent authority, as if he was, its services would have to respect all the rules which apply the competent authorities, in particular the obligation to have a SMS: this is not possible in the French system and it would be too complex, too expensive and not feasible considering the reduced resources.

This should be taken into account while writing the rules: it is proposed to clarify this point by distinguishing in the rules the "competent authorities" and the "other authorities". Moreover, security and local land use authorities are considered as "authorities" but shall not be "competent authorities" as requiring them to have a management system would be totally unfeasible.

However, coordination between these entities exists and can be made through several means. DGAC understands that coordination arrangements can be fulfilled by the mean of: protocols, legally defined coordination, or both entities being members of the government or the same State authorities.

DGAC France fully supports the use of the word "appropriate authority" in the definition of "clearway" in CS-ADR-DSN.A.002 (p5), which gives to France the flexibility we need.

It is proposed to clarify these points by:

- **modifying paragraph (c) of ADR.AR.B.005 as follows :**

"The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance of other competent authorities/authorities of the Member State concerned.

- **replacing the 2 first sentences of AMC1-ADR.AR.B.005(c) by:**

« The coordination between the competent authority(ies) and the other authorities of the Member State should be formally documented, and should encompass, as deemed appropriate by the Member State, the following authorities :

*~~The competent authority should establish coordination arrangements with other **competent** authorities of the Member State. Such coordination arrangements should in particular include the following **competent** authorities ... »~~*

- **modifying the provisions on surroundings: ADR-AR.C.065, ADR-AR.C.070, ADR-AR.C.075, ADR-AR.C.080 and corresponding AMCs and GMs, and AMC1-ADR.AR.C.060(b) as proposed in specific DGAC's comments.**

response Noted

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)

- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State,

without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

*(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."*

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions

related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in

coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC8 ADR OPS.B.075 — Marking of objects (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 – Lighting of objects (p150).

response

Noted

With regard to AMC2-ADR-AR.C.065 (b), article will be removed.

comment

1040

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC-GM to Annex I – AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)

2. Justification and proposed text / comment

DGAC notices that AMC2-ADR-AR.C.065 (b) on wind turbines marking and/or lighting is different from the provisions 6.4 of Annex 14 volume 1, which can induce several issues detailed below.

* **Paragraphs (c)(1) and (d)(3)** of this AMS define a wind farm as a group of five or more wind turbines whereas the ICAO definition is two or more (see recommendation 6.4.3). The safety issue that lead to this change is not apparent and even may increase danger for smaller group of wind turbines

AMC2-ADR-AR.C.065 (b) – Obstacles - Objects

"WIND TØURBINES

[...]

(c) Lighting – day use

(1) When lighting is deemed necessary by the competent authority, medium-intensity obstacle lights should be used. In the case of a wind farm, i.e. a group of ~~five~~ **two** or more wind turbines, it should be regarded as an extensive object and the lights should be installed:

[...]

(d) Lighting – night use [...]

(3) In the case of a wind farm, i.e. a group of ~~five~~ **two** or more wind turbines, when lighting is deemed necessary, it should be regarded as an extensive object and lights should be installed:

[...]"

* **Paragraphs (d)(1) and (e)** let the possibility for the competent authority to prescribe steady lights and **paragraph (d)(4)** indicates that the intensity should be reduced for some mentioned reasons. These possibilities are not allowed by ICAO standards and recommended practices in Annex 14 volume 1.

Moreover, the consequences on the safety of aircraft operations are not known, so each time there is a possibility of using them, an aeronautical study should systemically be conducted to verify that the safety is not adversely affected.

In addition to that, these possibilities lack too much of clarity and may bring too much questions and confusion. Indeed, the lights used for the lighting of wind turbines are medium-intensity lights, or high-intensity if deemed necessary, which are flashing lights and have stated intensities according to table 2 - *characteristics of obstacle lights*. But, for steady lights, the ones that are in table 2 are really not adapted to the lighting of wind turbines; therefore it is not clear whether the steady lights of table 2 are to be used or other steady lights.

Considering the numerous issues brought by these possibilities and the risk of increased danger, DGAC proposed to delete them, given the fact that if in a particular case such lights may be needed, there is always the possibility of making an alternate means of compliance that will have to demonstrate that safety is not compromised.

Note: if the Agency decides nevertheless to keep them, they should at least be subjected to the fulfilment of an aeronautical study demonstrating that safety is not adversely affected.

AMC2-ADR-AR.C.065 (b) – Obstacles - Objects

"[...]

(d) *Lighting – night use*

(1) *The competent authority should prescribe medium-intensity flashing red lights instead of white lights. ~~The competent authority may prescribe steady lights instead of flashing lights or coded red lights.~~ [...]*

(4) *The light intensity should be reduced so as to prevent dazzling effects, significant environmental concerns or if the competent authority concludes that reduction guarantees a satisfactory level of obstacle visibility.*

[...]

(e) *The competent authority may prescribe red light instead of white light and steady lighting instead of flashing lighting."*

response

Noted

Article will be removed.

comment

1142

comment by: Danish Transport Authority

In general the content regarding marking on wind turbines continues to leave the Member States behind with the challenge of harmonizing the requirements. In particular the wind turbines reaching above 150 meter needs further uniformity. The following comments to AMC2-ADR-AR.C.065 (b) should give some indicators of urgent need for further harmonization.

response

Noted

Article will be removed.

comment

1143

comment by: Danish Transport Authority

(a) An obstacle with a height of 150 m or more should be regarded as an obstacle. Above the minimum flying height of 500 ft every construction should be regarded as an obstacle. This requirement is also supported in the NPA, one example is item (a) (8) under AMC1-ADR-AR.C.065. Objects with a height between the established height by the authority (referring to NPA Article 8, item 2) and 150 meter will be considered as an obstacle if required by the competent authority.

response

Noted

Article will be removed.

comment

1144

comment by: Danish Transport Authority

(c) (1) The term "wind farm" and the associated number of wind turbines is not in line with ICAO Annex 14. The logic solution would be three

	<p>windturbines or more, if you take the requirement of identifying the perimeter of the wind farm. Only wind turbines at the end of the three wind turbines on line should be marked with light (and assuming the maximum spacing regarding to the required minimum visibility for the pilot is complied).</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>1145 comment by: Danish Transport Authority</p> <p>(c) (3) High-intensity white lights can be either type A or B. The current draft doesn't distinguish between the types of lights. Guidelines on the the type of light should be implemented. Starting point will be ICAO Doc 9157, Part 4, chapter 14.</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>1146 comment by: Danish Transport Authority</p> <p>(d) (1) Determination on which kind of light (type) used as obstacle marking at night should be assessed. The preferred type steady/flashing should be GM. Duplication of the prescribed guidelines on steady vs. flashing lights should be avoided (referring to item (e) in the same paragraph).</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>1147 comment by: Danish Transport Authority</p> <p>(d) (1) Coded red lights are mentioned. Further description and/or guidelines on this type should be made available.</p>
response	<p>Noted</p> <p>Article will be removed.</p>
comment	<p>1148 comment by: Danish Transport Authority</p> <p>(d) (4) Reduction on light intensity to prevent environmental concerns or other effects should be GM. Further description needed if the assesment of non related safety issues should be covered. Some Member States uses other kinds of criteria than ICAO and the NPA in regard to reduction of light intensity and use of the earlier mentioned coded light. This should be adressed in more detail.</p>
response	<p>Noted</p> <p>Article will be removed.</p>

comment 1149 comment by: *Danish Transport Authority*
(d)(3)(ii) The referred paragraph CS-ADR-DSN.Q.855 (b)(4) does not exist.

response Noted
Article will be removed.

comment 1150 comment by: *Danish Transport Authority*
A key issue on wind turbines is the location of the obstacle lights. Referring to AMC1-ADR-AR.C.065 (b) (b) (1) the location should be as close as practicable to the top of the object. Current developments within the wind turbine sector results in project with distances of more than 80 meters between the nacelle and the highest point of the blade. Lighting on the nacelle can provide sufficient marking in regard to visibility and conspicuity, but the extent of obstacles are not covered by this. Paragraph (c) (4) could lead to the assumption that marking on the nacelle is adequate.

response Noted
Article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights – LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

p. 52

comment 789 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- Draft Commission Regulation - Article 3 – Oversight capabilities - paragraph 1 (p10)
- ANNEX I – Part-AR - ADR.AR.B.005(c) – Management System (p20)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR-AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (c) (p30)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.005(c) – Management System (p13)
- AMC-GM to Annex I – AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
- AMC-GM to Annex I – AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC2-ADR-AR.C.070(a) – Confusing, misleading and hazardous lights (p52)

- AMC-GM to Annex I - AMC1-ADR.AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC/GM to ANNEX I — Part-AR - AMC1-ADR.AR.C.060(b) — Wildlife hazard management – MITIGATING MEASURES (page 37)
- CS-ADR - Book 1 - CS-ADR-DSN.A.002 – Definitions – ‘clearway’ (p5)

2. Justification and proposed text / comment

This comment is linked with comment 1008 in book I and 591 in book III. This comment is **critical** as the rules, as written presently, can not be applied in the French system, linked with the definition of “competent authority” and its related obligations. This comment is linked to the issue on responsibility (see proposal for adding Article 2bis in the Cover regulation).

This comment aims to inform EASA on how the French DGAC understands the notion of “competent authority”, and also to list the rules which can not be applied for such competent authority.

France understands the competent authority is the civil aviation authority in charge of the oversight of the aerodrome operator for the tasks mentioned in its aerodrome certificate.

To explain our comment: In France, there are regions, and representatives from the States in these regions (“préfet” in French). The local representative from the State has some responsibilities, particularly for land planning use. For example, this representative is competent on land use matters to apply the obstacle limitation surfaces and to edict rules on policy on aerodromes (e.g. defining the movement area or stating that people working on the aerodrome have to be trained). The “préfet” is not considered as a competent authority, as if he was, its services would have to respect all the rules which apply the competent authorities, in particular the obligation to have a SMS: this is not possible in the French system and it would be too complex, too expensive and not feasible considering the reduced resources.

This should be taken into account while writing the rules: it is proposed to clarify this point by distinguishing in the rules the “competent authorities” and the “other authorities”. Moreover, security and local land use authorities are considered as “authorities” but shall not be “competent authorities” as requiring them to have a management system would be totally unfeasible.

However, coordination between these entities exists and can be made through several means. DGAC understands that coordination arrangements can be fulfilled by the mean of: protocols, legally defined coordination, or both entities being members of the government or the same State authorities.

DGAC France fully supports the use of the word “appropriate authority” in the definition of “clearway” in CS-ADR-DSN.A.002 (p5), which gives to France the flexibility we need.

It is proposed to clarify these points by:

- **modifying paragraph (c) of ADR.AR.B.005 as follows :**

“The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance of other

competent authorities/authorities of the Member State concerned.

- **replacing the 2 first sentences of AMC1-ADR.AR.B.005(c) by:**

« The coordination between the competent authority(ies) and the other authorities of the Member State should be formally documented, and should encompass, as deemed appropriate by the Member State, the following authorities :

~~The competent authority should establish coordination arrangements with other **competent** authorities of the Member State. Such coordination arrangements should in particular include the following **competent** authorities ... »~~

- **modifying the provisions on surroundings: ADR-AR.C.065, ADR-AR.C.070, ADR-AR.C.075, ADR-AR.C.080 and corresponding AMCs and GMs, and AMC1-ADR.AR.C.060(b) as proposed in specific DGAC's comments.**

response Noted

comment 1015 ❖ comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR-AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I – AMC2-ADR.AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I – AMC2-ADR.AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)

- AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR.AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done “without prejudice to the system and legal provisions of the Member State”. This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- **Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects**

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- **ADR.AR.C.070 — Confusing, misleading and hazardous lights REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 — Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 — Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) — Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting — day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any

direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in

these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.

2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "*the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner*". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(d) The risks caused by human activities and land use which should be assessed and mitigated should include:

(1) obstacles and the possibility of induced turbulence;

(2) the use of hazardous, confusing and misleading lights;

(3) the dazzling caused by large and highly reflective surfaces;

(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;

(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."

~~AMC2-ADR-OPS.B.075 – Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 – Objects on runway strips (p18),
- CS-ADR-DSN.B.170 – Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 – Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 – Precision approach runways (p46),
- CS-ADR-DSN.J.485 – Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3-ADR-OPS.B.075 – Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).

~~AMC4-ADR-OPS.B.075 – Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).

~~**AMC5 ADR OPS.B.075 – Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).

~~**AMC6 ADR OPS.B.075 – Obstacles that extends above an approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146).

~~**AMC7 ADR OPS.B.075 – Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).

~~**AMC8 ADR OPS.B.075 – Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 – Marking of objects (p147).

~~**AMC9 ADR OPS.B.075 – Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 – Lighting of objects (p150).

response

Noted

With regard to AMC1-ADR.AR.C.070(a), article will be removed.

comment

1047

comment by: NATS National Air Traffic Services Limited

There are two AMC to ADR.AR.C.070 which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merge the two AMC into a single AMC.

response

Noted

GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles.
Article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights – LIGHTS WHICH MAY CAUSE CONFUSION

p. 52

comment

215

comment by: KLM

Change proposal:

Laser lighting at aircraft has to be made a criminal act to protect the safety of flights everywhere and not only in a protective zone around the airport.

response

Noted

The proposed provisions are limited by the scope of the Basic Regulation.

comment

789 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- Draft Commission Regulation - Article 3 – Oversight capabilities - paragraph 1 (p10)
- ANNEX I – Part-AR - ADR.AR.B.005(c) – Management System (p20)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (c) (p30)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.005(c) – Management System (p13)
- AMC-GM to Annex I – AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
- AMC-GM to Annex I – AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC2-ADR-AR.C.070(a) – Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC1-ADR-AR.C.070(b) – Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC/GM to ANNEX I – Part-AR - AMC1-ADR-AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES (page 37)
- CS-ADR - Book 1 - CS-ADR-DSN.A.002 – Definitions – ‘clearway’ (p5)

2. Justification and proposed text / comment

This comment is linked with comment 1008 in book I and 591 in book III. This comment is **critical** as the rules, as written presently, can not be applied in the French system, linked with the definition of “competent authority” and its related obligations. This comment is linked to the issue on responsibility (see proposal for adding Article 2bis in the Cover regulation).

This comment aims to inform EASA on how the French DGAC understands the notion of “competent authority”, and also to list the rules which can not be applied for such competent authority.

France understands the competent authority is the civil aviation authority in charge of the oversight of the aerodrome operator for the tasks mentioned in its aerodrome certificate.

To explain our comment: In France, there are regions, and representatives

from the States in these regions ("préfet" in French). The local representative from the State has some responsibilities, particularly for land planning use. For example, this representative is competent on land use matters to apply the obstacle limitation surfaces and to edict rules on policy on aerodromes (e.g. defining the movement area or stating that people working on the aerodrome have to be trained). The "préfet" is not considered as a competent authority, as if he was, its services would have to respect all the rules which apply the competent authorities, in particular the obligation to have a SMS: this is not possible in the French system and it would be too complex, too expensive and not feasible considering the reduced resources.

This should be taken into account while writing the rules: it is proposed to clarify this point by distinguishing in the rules the "competent authorities" and the "other authorities". Moreover, security and local land use authorities are considered as "authorities" but shall not be "competent authorities" as requiring them to have a management system would be totally unfeasible.

However, coordination between these entities exists and can be made through several means. DGAC understands that coordination arrangements can be fulfilled by the mean of: protocols, legally defined coordination, or both entities being members of the government or the same State authorities.

DGAC France fully supports the use of the word "appropriate authority" in the definition of "clearway" in CS-ADR-DSN.A.002 (p5), which gives to France the flexibility we need.

It is proposed to clarify these points by:

- **modifying paragraph (c) of ADR.AR.B.005 as follows :**

"The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance of other competent authorities/authorities of the Member State concerned.

- **replacing the 2 first sentences of AMC1-ADR.AR.B.005(c) by:**

« The coordination between the competent authority(ies) and the other authorities of the Member State should be formally documented, and should encompass, as deemed appropriate by the Member State, the following authorities :

*~~The competent authority should establish coordination arrangements with other **competent** authorities of the Member State. Such coordination arrangements should in particular include the following **competent** authorities ... »~~*

- **modifying the provisions on surroundings: ADR-AR.C.065, ADR-AR.C.070, ADR-AR.C.075, ADR-AR.C.080 and corresponding AMCs and GMs, and AMC1-ADR.AR.C.060(b) as proposed in specific DGAC's comments.**

response Noted

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles - Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects -precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects -runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects - other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects - obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects - wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle

- restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
 - AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
 - AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
 - AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
 - AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
 - AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
 - AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish

protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters.”

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

“The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a).”

- **ADR.AR.C.080 – Other activities**

“The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated.”

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

“WIND TŌURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]”

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above.”

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation

and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent

authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC8 ADR OPS.B.075 — Marking of objects (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 —

	<i>Lighting of objects (p150).</i>
response	Noted With regard to AMC2-ADR.AR.C.070(a), article will be removed.
comment	1048 comment by: <i>NATS National Air Traffic Services Limited</i> There are two AMC to ADR.AR.C.070 which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merge the two AMC into a single AMC.
response	Noted GM (Guidance Material) or AMC (Acceptable Means of Compliance) on different subject matters are handled separately and numbered sequentially according to our drafting principles. Article will be removed.

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights – LASER EMISSIONS WHICH MAY ENDANGER SAFETY</p>	p. 53
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comment	684	comment by: <i>ADP : Aeroports de Paris</i>
	Référence: AMC1-ADR-AR.C.070(b)	Confusing, misleading and hazardous lights LASER EMISSIONS WHICH MAY ENDANGER SAFETY
	Proposition/commentaire	(a) Il convient de modifier de la manière suivante: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters" (1)(2)(3) Il convient de transférer ces dispositions en Guidance Materials car il existe plusieurs possibilités de restriction autres que celles-ci.
	Justification	L'AMC est trop rigide en reprenant une

	<p>recommandation de l'OACI. Le (b) est également en légère contradiction avec les différentes zones dans la mesure où il n'y a pas forcément besoin d'avoir ces trois zones. Elles sont d'ailleurs actuellement en discussion à l'OACI.</p>
<p>Traduction de courtoisie</p>	<p>(a) It is appropriate to modify in the following way: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aèrodrôme and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters"</p> <p>(1)(2)(3) It is appropriate to transfer these provisions to GM because there are others restriction possibilities.</p> <p>By rewriting a recommendation, the AMC is too rigid. The (b) is lightly in contradiction with the different areas if there is no necessary need to have these three areas. Besides, they are currently discussed in ICAO.</p>

response

Noted
Article will be removed.

comment

786 comment by: *Union des Aéroports français - UAF*
Attachment [#67](#)
UAF NPA 2011-20 (B.II) AMC1-ADR-AR.C.070(b)
Référence: AMC1-ADR-AR.C.070(b)
Confusing, misleading and hazardous lights
LASER EMISSIONS WHICH MAY ENDANGER SAFETY
Traduction de courtoisie
(a) It is appropriate to modify in the following way: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aèrodrôme and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters"

(1)(2)(3) It is appropriate to transfer these provisions to GM because there are others restriction possibilities. By rewriting a recommendation, the AMC is too rigid. The (b) is lightly in contradiction with the different areas if there is no necessary need to have these three areas. Besides, they are currently discussed in ICAO.

response

Noted

Article will be removed.

comment

789 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- Draft Commission Regulation - Article 3 – Oversight capabilities - paragraph 1 (p10)
- ANNEX I – Part-AR - ADR.AR.B.005(c) – Management System (p20)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (c) (p30)
- AMC/GM to ANNEX I – Part-AR – AMC1-ADR.AR.B.005(c) – Management System (p13)
- AMC-GM to Annex I – AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
- AMC-GM to Annex I – AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC2-ADR-AR.C.070(a) – Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I – AMC1-ADR-AR.C.070(b) – Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC/GM to ANNEX I – Part-AR - AMC1-ADR-AR.C.060(b) – Wildlife hazard management – MITIGATING MEASURES (page 37)
- CS-ADR - Book 1 - CS-ADR-DSN.A.002 – Definitions – ‘clearway’ (p5)

2. Justification and proposed text / comment

This comment is linked with comment 1008 in book I and 591 in book III. This comment is **critical** as the rules, as written presently, can not be applied in the French system, linked with the definition of “competent authority” and its related obligations. This comment is linked to the issue on responsibility (see proposal for adding Article 2bis in the Cover regulation).

This comment aims to inform EASA on how the French DGAC understands the notion of “competent authority”, and also to list the rules which can not be applied for such competent authority.

France understands the competent authority is the civil aviation authority in charge of the oversight of the aerodrome operator for the tasks

mentioned in its aerodrome certificate.

To explain our comment: In France, there are regions, and representatives from the States in these regions ("préfet" in French). The local representative from the State has some responsibilities, particularly for land planning use. For example, this representative is competent on land use matters to apply the obstacle limitation surfaces and to edict rules on policy on aerodromes (e.g. defining the movement area or stating that people working on the aerodrome have to be trained). The "préfet" is not considered as a competent authority, as if he was, its services would have to respect all the rules which apply the competent authorities, in particular the obligation to have a SMS: this is not possible in the French system and it would be too complex, too expensive and not feasible considering the reduced resources.

This should be taken into account while writing the rules: it is proposed to clarify this point by distinguishing in the rules the "competent authorities" and the "other authorities". Moreover, security and local land use authorities are considered as "authorities" but shall not be "competent authorities" as requiring them to have a management system would be totally unfeasible.

However, coordination between these entities exists and can be made through several means. DGAC understands that coordination arrangements can be fulfilled by the mean of: protocols, legally defined coordination, or both entities being members of the government or the same State authorities.

DGAC France fully supports the use of the word "appropriate authority" in the definition of "clearway" in CS-ADR-DSN.A.002 (p5), which gives to France the flexibility we need.

It is proposed to clarify these points by:

- **modifying paragraph (c) of ADR.AR.B.005 as follows :**

"The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance of other competent authorities/authorities of the Member State concerned.

- **replacing the 2 first sentences of AMC1-ADR.AR.B.005(c) by:**

« The coordination between the competent authority(ies) and the other authorities of the Member State should be formally documented, and should encompass, as deemed appropriate by the Member State, the following authorities :

*~~The competent authority should establish coordination arrangements with other **competent** authorities of the Member State. Such coordination arrangements should in particular include the following **competent** authorities ... »~~*

- **modifying the provisions on surroundings: ADR-AR.C.065, ADR-AR.C.070, ADR-AR.C.075, ADR-AR.C.080 and corresponding AMCs and GMs, and AMC1-ADR.AR.C.060(b) as proposed in specific DGAC's comments.**

response Noted

comment 1015 ❖ comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles - Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects -precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects -runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects - other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects - obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects - wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of

- aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
 - AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
 - AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
 - AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
 - AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
 - AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
 - AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
 - AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

*(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice*

to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

*(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."*

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

*(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:*

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner"*. Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or

hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

~~Note: these provisions are already dealt with in:~~

- ~~· CS-ADR-DSN.B.165 — Objects on runway strips (p18),~~
- ~~· CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),~~
- ~~· CS-ADR-DSN.J.475 — Non-precision approach runways (p45),~~
- ~~· CS-ADR-DSN.J.480 — Precision approach runways (p46),~~
- ~~· CS-ADR-DSN.J.485 — Runways meant for take-off (p47),~~
- ~~· CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb surface (p170-171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).~~

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).~~

~~**AMC9-ADR-OPS.B.075—Location of obstacle lights (p172)**~~
Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 – Lighting of objects (p150).

response

Noted
 With regard to AMC1-ADR.AR.C.070(b), article will be removed.

comment

1372 comment by: Euroairport Bâle-Mulhouse
 Attachment [#68](#)
 Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR-AR.C.070(b)
 Référence: AMC1-ADR-AR.C.070(b)
 Confusing, misleading and hazardous lights
 LASER EMISSIONS WHICH MAY ENDANGER SAFETY
 Traduction de courtoisie
 (a) It is appropriate to modify in the following way: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters"
 (1)(2)(3) It is appropriate to transfer these provisions to GM because there are others restriction possibilities. By rewriting a recommendation, the AMC is too rigid. The (b) is lightly in contradiction with the different areas if there is no necessary need to have these three areas. Besides, they are currently discussed in ICAO.

response

Noted
 Article will be removed.

comment

1679 comment by: Aéroport de Marseille - MRS/LFML
 (a) It is appropriate to modify in the following way: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters"
 (1)(2)(3) It is appropriate to transfer these provisions to GM because there are others restriction possibilities.
 By rewriting a recommendation, the AMC is too rigid. The (b) is lightly in contradiction with the different areas if there is no necessary need to have these three areas. Besides, they are currently discussed in ICAO.

response

Noted

Article will be removed.

comment	1736	comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i>
	Attachment #69	
	UAF NPA 2011-20 (B.II) AMC1-ADR-AR.C.070(b)	
	Référence: AMC1-ADR-AR.C.070(b) Confusing, misleading and hazardous lights LASER EMISSIONS WHICH MAY ENDANGER SAFETY	
	Traduction de courtoisie (a) It is appropriate to modify in the following way: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters" (1)(2)(3) It is appropriate to transfer these provisions to GM because there are others restriction possibilities. By rewriting a recommendation, the AMC is too rigid. The (b) is lightly in contradiction with the different areas if there is no necessary need to have these three areas. Besides, they are currently discussed in ICAO.	
response	Noted Article will be removed.	

comment	1952	comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i>
	(a) It is appropriate to modify in the following way: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters" (1)(2)(3) It is appropriate to transfer these provisions to GM because there are others restriction possibilities. By rewriting a recommendation, the AMC is too rigid. The (b) is lightly in contradiction with the different areas if there is no necessary need to have these three areas. Besides, they are currently discussed in ICAO.	
response	Noted Article will be removed.	

comment	2314	comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i>
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<p>Référence: AMC1-ADR-AR.C.070(b)</p>	<p>Confusing, misleading and hazardous lights LASER EMISSIONS WHICH MAY ENDANGER SAFETY</p>
<p>Proposition/commentaire</p>	<p>(a) Il convient de modifier de la manière suivante: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters"</p> <p>(1)(2)(3) Il convient de transférer ces dispositions en Guidance Materials car il existe plusieurs possibilités de restriction autres que celles-ci.</p>
<p>Justification</p>	<p>L'AMC est trop rigide en reprenant une recommandation de l'OACI. Le (b) est également en légère contradiction avec les différentes zones dans la mesure où il n'y a pas forcément besoin d'avoir ces trois zones. Elles sont d'ailleurs actuellement en discussion à l'OACI.</p>
<p>Traduction de courtoisie</p>	<p>(a) It is appropriate to modify in the following way: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters"</p> <p>(1)(2)(3) It is appropriate to transfer these provisions to GM because there are others restriction possibilities.</p> <p>By rewriting a recommendation, the AMC is too rigid. The (b) is lightly in contradiction with the different areas if there is no necessary need to have these three areas. Besides,</p>

	they are currently discussed in ICAO.
response	Noted Article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX I – Part Authority Requirements (Part-AR) – SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) – GM1-ADR.AR.C.070(b) – Confusing, misleading and hazardous lights – LASER EMISSIONS p. 53-55

comment	1840 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i> Attachment #70 ADBM - NPA 2011-20 (B.II) AMC1-ADR-AR.C.070(b) Référence: AMC1-ADR-AR.C.070(b) Confusing, misleading and hazardous lights LASER EMISSIONS WHICH MAY ENDANGER SAFETY Traduction de courtoisie (a) It is appropriate to modify in the following way: "(a) In order to protect the safety of aircrafts against the hazardous effects of laser emitters, the competent authority should ensure determine that these the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other competent authorities are in place. in order to protect the safety of aircraft against the hazardous effects of laser emitters" (1)(2)(3) It is appropriate to transfer these provisions to GM because there are others restriction possibilities. By rewriting a recommendation, the AMC is too rigid. The (b) is lightly in contradiction with the different areas if there is no necessary need to have these three areas. Besides, they are currently discussed in ICAO.
response	Noted If referred to AMC1-ADR-AR.C.070(b), article will be removed.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART A – GENERAL REQUIREMENTS (ADR.OR.A) – GM1-ADR.OR.A.005 – Scope – AERODROMES OPEN TO PUBLIC USE p. 56

comment	744 comment by: <i>ADP : Aeroports de Paris</i>				
	<table border="1"> <tr> <td>Référence: GM1-ADR.OR.A.005</td> <td>Scope</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Le GM, au lieu de donner des explications</td> </tr> </table>	Référence: GM1-ADR.OR.A.005	Scope	Proposition/commentaire	Le GM, au lieu de donner des explications
Référence: GM1-ADR.OR.A.005	Scope				
Proposition/commentaire	Le GM, au lieu de donner des explications				

	claires, apporte la plus totale confusion. Il va même dans un sens contraire au règlement de base dans son 3 ^{ème} paragraphe considérant que tous les aérodromes à usage commercial entrent dans le champ de ce règlement. Ce GM est à revoir totalement ou à supprimer.
Justification	
Traduction de courtoisie	Instead of giving some clear explanations, the GM brings the utter confusion. It even goes against the basic regulation in its 3 rd paragraph estimating that all commercial aerodromes are included within the scope of this regulation. This GM is to be totally reviewed or to be deleted.

response Accepted
The Agency has reviewed and removed this Guidance Material.

comment **919** comment by: *Union des Aéroports français - UAF*
Attachment [#71](#)
UAF NPA 2011-20 (B.II) GM1-ADR.OR.A.005
Référence: GM1-ADR.OR.A.005
Scope
Traduction de courtoisie
Instead of giving some clear explanations, the GM brings the utter confusion. It even goes against the basic regulation in its 3rd paragraph estimating that all commercial aerodromes are included within the scope of this regulation. This GM is to be totally reviewed or to be deleted.

response Accepted
The Agency has reviewed and removed this Guidance Material.

comment **1007** comment by: *SWISS AERODROMES ASSOCIATION*
"Public use" must be considered as access without restrictions. The fact that Commercial Air Transport uses an aerodrome cannot and should not qualify this aerodrome as being open to public use.

The aim of the Regulation is Safety and not the extension of its scope. Safety can be achieved through implementation of general rules but not only. It also can be ensured by the way of notifications, approval, conditions and/or qualification scheme prior to the use of an aerodrome by a crew. Wherever such tailored solutions are in place and approved by the competent authority - which will address the issue of safe operation from the point of view of the aircraft operator too ! - there is no need to qualify the aerodrome as being open to public use and falling under the scope of

	the EASA Regulation.
response	Noted The Agency has reviewed and removed this Guidance Material.
comment	1168 comment by: <i>NATS National Air Traffic Services Limited</i> AMC/GM to Annex II – Part Organisation Requirements (Part-OR) - This Title is missing from the Rule and should be included above "SUBPART A – GENERAL REQUIREMENTS (ADR.OR.A)".
response	Noted The Agency has reviewed and removed this Guidance Material.
comment	1306 comment by: <i>Euroairport Bâle-Mulhouse</i> Attachment #72 Aéroport Bâle – Mulhouse NPA 2011-20 (B.II)GM1-ADR.OR.A.005 Référence: GM1-ADR.OR.A.005 Scope Traduction de courtoisie Instead of giving some clear explanations, the GM brings the utter confusion. It even goes against the basic regulation in its 3 rd paragraph estimating that all commercial aerodromes are included within the scope of this regulation. This GM is to be totally reviewed or to be deleted.
response	Accepted The Agency has reviewed and removed this Guidance Material.
comment	1586 comment by: <i>Aéroport de Marseille - MRS/LFML</i> Instead of giving some clear explanations, the GM brings the utter confusion. It even goes against the basic regulation in its 3 rd paragraph estimating that all commercial aerodromes are included within the scope of this regulation. This GM is to be totally reviewed or to be deleted.
response	Accepted The Agency has reviewed and removed this Guidance Material.
comment	1835 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i> Attachment #73 UAF NPA 2011-20 (B.II) GM1-ADR.OR.A.005 Référence: GM1-ADR.OR.A.005 Scope Traduction de courtoisie

response Instead of giving some clear explanations, the GM brings the utter confusion. It even goes against the basic regulation in its 3rd paragraph estimating that all commercial aerodromes are included within the scope of this regulation. This GM is to be totally reviewed or to be deleted.

Accepted

The Agency has reviewed and removed this Guidance Material.

comment 1951 comment by: Pau Pyrénées Airport - PUF/LFBP

Instead of giving some clear explanations, the GM brings the utter confusion. It even goes against the basic regulation in its 3rd paragraph estimating that all commercial aerodromes are included within the scope of this regulation. This GM is to be totally reviewed or to be deleted.

response Accepted

The Agency has reviewed and removed this Guidance Material.

comment 1955 comment by: ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD

Attachment [#74](#)

ADBM - NPA 2011-20 (B.II) GM1-ADR.OR.A.005

Référence: GM1-ADR.OR.A.005
Scope

Traduction de courtoisie
Instead of giving some clear explanations, the GM brings the utter confusion. It even goes against the basic regulation in its 3rd paragraph estimating that all commercial aerodromes are included within the scope of this regulation. This GM is to be totally reviewed or to be deleted.

response Accepted

The Agency has reviewed and removed this Guidance Material.

comment 2375 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence: GM1-ADR.OR.A.005	Scope
Proposition/commentaire	Le GM, au lieu de donner des explications claires, apporte la plus totale confusion. Il va même dans un sens contraire au règlement de base dans son 3 ^{ème} paragraphe considérant que tous les aérodromes à usage commercial entrent dans le champ de ce règlement. Ce GM est à revoir totalement ou à supprimer.
Justification	

Traduction de courtoisie	Instead of giving some clear explanations, the GM brings the utter confusion. It even goes against the basic regulation in its 3 rd paragraph estimating that all commercial aerodromes are included within the scope of this regulation. This GM is to be totally reviewed or to be deleted.
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response Accepted
The Agency has reviewed and removed this Guidance Material.

comment 2444 comment by: TAG Farnborough Airport Ltd
Aerodromes Open to Public Use - The current system of license in the UK allows for Ordinary & Public. This allows airfields to operate under a system of prior notification and allows the operator to refuse permission for use. Aerodromes such as Farnborough operate under a planning permission granted by the Local Planning Authority which runs alongside the CAA Licence. The planning permission does not allow scheduled operators and the licence gives the aerodrome authority the additional ability to deny use.

This requirement removes that additional aid and should therefore be deleted and replaced by one that allows aerodromes who operate by prior notification the right to deny permission.

response Noted
The Agency has reviewed and removed this Guidance Material.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B – CERTIFICATION (ADR.OR.B) – AMC1-ADR.OR.B.015(b)(1);(2);(3) – Application for a certificate – INFORMATION TO BE PROVIDED TO THE COMPETENT AUTHORITY p. 57-58

comment 98 comment by: CAA Norway
Editorial: The initial wording in AMC1-ADR.OR.B.015(b) (1) to (4) on page 57 does not correspond to the initial "The applicant should provide the competent authority information with regard to:" Please reword to make it better.

response Accepted
The whole paragraph has been reworded to improve readability.

comment 99 comment by: CAA Norway
Editorial: We suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (3) and (4) on page 57: **"the chart showing** the design of the aerodrome..."

response Partially accepted

The sentence has been reworded, however, the proposed term is not found to be suitable for this phase of the process, and, therefore, the term 'drawing' has been used instead.

comment 100 comment by: CAA Norway
We suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (b)(4)(iv) on page 57: "... any **present** obstacles or objects that could endanger safety;"

response Partially accepted
The Agency has reworded the text.

comment 101 comment by: CAA Norway
Not all equipment can/will be shown on a chart. Suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (b)(4)(v) on page 57 : "...and any **relevant** installations and equipment ..."

response Partially accepted
The Agency has the view that the location of all fixed equipment should be shown. The text has been reworded on this basis.

comment 181 comment by: SWISS AERODROMES ASSOCIATION
Letter (c), first sentence, should be modified and "the certification specifications" replaced by "the certification basis".

response Noted
The Agency considers that the current text is in line with the relevant Implementing Rule.

comment 423 comment by: Estonian CAA
We suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (b)(4)(iv) on page 57: "... any present obstacles or objects that could endanger safety;"

response Partially accepted
The Agency has reworded the text.

comment 462 comment by: Icelandic Civil Aviation Administration
Editorial: The initial wording in AMC1-ADR.OR.B.015(b) (1) to (4) on page 57 does not correspond to the initial "The applicant should provide the competent authority information with regard to:" Please reword to make it better.

response Accepted

The whole paragraph has been reworded to improve readability.

comment 463 comment by: *Icelandic Civil Aviation Administration*

Editorial: We suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (3) and (4) on page 57: "the chart showing the design of the aerodrome..."

response Partially accepted

The sentence has been reworded, however, the proposed term is not found to be suitable for this phase of the process, and, therefore, the term 'drawing' has been used instead.

comment 464 comment by: *Icelandic Civil Aviation Administration*

We suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (b)(4)(iv) on page 57: "... any present obstacles or objects that could endanger safety;"

response Partially accepted

The Agency will reword the text.

comment 465 comment by: *Icelandic Civil Aviation Administration*

Not all equipment can/will be shown on a chart. Suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (b)(4)(v) on page 57 : "...and any relevant installations and equipment ..."

response Partially accepted

The Agency has the view that the location of all fixed equipment should be shown. The text has been reworded on this basis.

comment 794 comment by: *Finnish Transport Safety Agency*

Editorial: We suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (3) and (4) on page 57: "the chart showing the design of the aerodrome..."

response Partially accepted

The sentence has been reworded, however, the proposed term is not found to be suitable for this phase of the process, and, therefore, the term 'drawing' has been used instead.

comment 795 comment by: *Finnish Transport Safety Agency*

We suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (b)(4)(iv) on page 57: "... any present obstacles or objects that could endanger safety;"

response Accepted

The Agency has reworded the text.

comment 1050 comment by: *NATS National Air Traffic Services Limited*

response

This AMC contains multiple instances of the word "should" thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.

Accepted

The Agency has reviewed the text, tried to avoid repetition of words where possible, and improve readability.

comment

1051 comment by: *NATS National Air Traffic Services Limited*

This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.

response

Accepted

The Agency has reviewed the text, tried to avoid repetition of words where possible, and improve readability.

comment

1192 comment by: *Federal Office of Civil Aviation FOCA*

AMC1-ADR.OR.B.015(b)(1);(2);(3), (b)(2)(ii): We suggest using aircraft code letter instead of types as there are too many types and changes are frequent. Limitations with code letter provide more clarity.

AMC1-ADR.OR.B.015(b)(1);(2);(3), (3) and (4): FOCA suggests wording: "the chart showing the design of the aerodrome..."

AMC1-ADR.OR.B.015(b)(1);(2);(3), (b)(4)(v): Not all eqmt can/will be shown on a chart. FOCA suggests wording: "...and any relevant installations and equipment ..."

response

Partially accepted

With regard to the first comment about the use of aircraft code instead of aircraft type, the Agency has the view that it is necessary to provide information about the aircraft types. Annex 14, paragraph 1.7 states that 'When applying Annex 14, Volume I, the aeroplanes which the aerodrome is intended to serve are first identified and then the two elements of the code'.

With regard to the second comment, it has been reworded, however, the proposed term is not found to be suitable for this phase of the process, and, therefore, the term 'drawing' has been used instead.

With regard to the third comment, the Agency has the view that the location of all fixed equipment should be shown, and so the text has been reworded on this basis.

comment

1240 comment by: *UK CAA*

Page No: 57

Paragraph No: AMC1-ADR.OR.B.015(b)(1);(2);(3)(b) (4 iv) —

Application for a certificate

Comment: The ICAO European Air Navigation Planning Group (EANPG) has asked ICAO H.Q. to consider the inclusion of appropriate provisions related to eTOD in ICAO Annex 14. It is considered important that the eTOD requirements are included in Annex 14 and thereby linked to the certification/licensing of aerodromes.

While there is no reference to ICAO Annex 15, Chapter 10 requirements in the NPA Explanatory Note or as a reference document in the Cross Reference Table, eTOD areas are referenced at the document references below:

The draft Commission Regulation NPA 2011-20 (B.II)

- a. AMC-ADR-OPS.A.005(b) & (c) (page 117) – Aeronautical Data
- b. AMC-ADR-OPS.A.010 (page 126) – Data quality requirements, Table 3

It is of concern that this regulation has not been fully considered when developing the NPA in respect of the Management of aeronautical data and aeronautical information.

Immediate action is required to address this oversight and ensure harmonisation of the Authority, Organisation and Operations Requirements for Aerodromes with ICAO Annex 15, Chapter 10.

response

Accepted

The AMC has been amended to accomodate this suggestion.

comment

1428

comment by: *Swedish Transport Agency*

Editorial: We suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (3) and (4) on page 57: "the chart showing the design of the aerodrome..."

response

Partially accepted

The sentence has been reworded, however, the proposed term is not found to be suitable for this phase of the process, and, therefore, the term 'drawing' has been used instead.

comment

1429

comment by: *Swedish Transport Agency*

We suggest rewording of AMC1-ADR.OR.B.015(b)(1);(2);(3), (b)(4)(iv) on page 57: "... any present obstacles or objects that could endanger safety;"

response

Partially accepted

The Agency has reworded the text.

comment

1506

comment by: *ECA - European Cockpit Association*

Comment on (c)(2):

	<p>The necessary documentation on how to achieve an ELoS should ideally contain a documentation of a safety assessment carried out with pilots of a local pilots' association. Alternatively this assessment could be done within the LRST as long as local pilots' associations are involved in the LRST.</p> <p>Justification: As pilots are usually the last line of defence against accidents there should be a possibility to address concerns for pilots during certification of an aerodrome.</p>
response	<p>Noted</p> <p>It is the responsibility of the aerodrome operator to identify and propose cases where an equivalent level of safety will be demonstrated, and to identify the method for doing so. The proposal must be acceptable to the authority. In this process, the aerodrome operator will have to determine the type of assessment and the expertise that is needed for demonstrating an equivalent level of safety.</p>
comment	<p>1507 comment by: <i>ECA - European Cockpit Association</i></p> <p>Comment on (d): If an exemption or derogation is deemed needed by the applicant this exemption / derogation should be carefully assessed including all concerned parties and local pilots' associations.</p> <p>Justification: Concerned parties and pilots' associations should try to find safest solution for these cases, while trying to keep the aerodrome as close as possible to the established standards applicable for this aerodrome.</p>
response	<p>Noted</p> <p>The aerodrome operator may ask for an exemption or a derogation, in accordance with the provisions of Article 14 of the Basic Regulation. It is the responsibility of the aerodrome operator to determine how to demonstrate compliance with the provisions of the above mentioned article, depending on the facts of each case.</p>
comment	<p>2250 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Suggest rewording: "...and any relevant installations and equipment ..."</p>
response	<p>Partially accepted</p> <p>The Agency has the view that the location of all fixed equipment should be shown. The text has been reworded on this basis.</p>
comment	<p>2251 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Suggest changing to: "the chart showing the design of the aerodrome..."</p>
response	<p>Partially accepted</p> <p>The sentence has been reworded, however, the proposed term is not</p>

found to be suitable for this phase of the process, and, therefore, the term 'drawing' has been used instead.

comment 2252 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
Recommend using aircraft code letter instead of types as there are many and changes are frequent.

response Noted
The Agency has the view that it is necessary to provide information about the aircraft types. Annex 14, paragraph 1.7 states that 'When applying Annex 14, Volume I, the aeroplanes which the aerodrome is intended to serve are first identified and then the two elements of the code'.

comment 2320 comment by: *Norwich International Airport*
GM2-ADR.OR.B.015(b) 1,2,3
NWI supports this proposal for the applicant to define the boundary of the certification area. It is important to not include inappropriate areas and this is a sensible proposal.

response Noted

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B
– CERTIFICATION (ADR.OR.B) – AMC1-ADR.OR.B.015(b)(3) –
Application for a certificate – PROVISION OF EVIDENCE OF
ARRANGEMENTS WITH THIRD PARTIES**

p. 58

comment 746 comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR-OR.B.015(b)(3)	Application for a certificate PROVISION OF EVIDENCE OF ARRANGEMENTS WITH THIRD PARTIES
Proposition/commentaire	Il convient d'indiquer qu'un arrêté de police (ou règlement local de police) applicable sur un aérodrome peut être considéré comme un arrangement.
Justification	Des règles, de conduite notamment, sur un aérodrome sont directement données par l'autorité par le biais de règlements locaux applicables sur l'aérodrome. En France il s'agit du préfet qui établit les arrêtés de police sur l'aérodrome, lui seul ayant la compétence d'y exercer ce pouvoir et en aucune manière l'exploitant d'aérodrome. Ces règles locales s'appliquent à tous et traitent bon nombre d'éléments qui pourraient faire l'objet des

	<p>arrangements cités par cette AMC. Si nous considérons que les règles de police locale sont également des arrangements alors nous estimons que cette AMC peut être respectée. Dans le cas contraire nous aurions une impossibilité juridico-administrative.</p>
<p>Traduction de courtoisie</p>	<p>It is appropriate to indicate in a legal text enforcing law and order applicable on an aerodrome can be considered as an arrangement.</p> <p>Some rules on an aerodrome are directly ordered by the authorities through local police regulations applicable on the aerodrome. In France, this is the Prefects who establishes legal texts enforcing law and order on the aerodrome. Only him is competent to exercise this power and not the aerodrome operator. These local rules apply to everyone and deal with many points that could be arrangements in this AMC. If we consider that legal texts enforcing law and order are arrangements as well, so we reckon that this AMC can be respected. Otherwise we would have a juridico-administrative impossibility.</p>

response

Noted

The AMC foresees that the aerodrome operator should 'provide all necessary evidence for arrangements with third parties that provide or intend to provide services or undertake activities at the aerodrome, whose activities may have an impact on safety...'

The AMC is also based on the essential requirement contained in Annex Va of the Basic Regulation which foresees that: (f) 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety...'. Such arrangements are necessary for the safe operation of the aerodrome and should take place in the context of the aerodrome operator's safety management system foreseen in the Basic Regulation, identifying, inter alia, responsibilities, obligations, etc.

However, the suggestion does not foresee the actual establishment of such arrangements between the aerodrome operator and the other organisations mentioned above.

comment

788

comment by: *Union des Aéroports français - UAF*

Attachment [#75](#)

	UAF	NPA	2011-20	(B.II)	AMC1-ADR-OR.B.015(b)(3)
	Référence: Application for a certificate PROVISION OF EVIDENCE OF ARRANGEMENTS WITH THIRD PARTIES				AMC1-ADR-OR.B.015(b)(3)
	Traduction de courtoisie It is appropriate to indicate in a legal text enforcing law and order applicable on an aerodrome can be considered as an arrangement. Some rules on an aerodrome are directly ordered by the authorities through local police regulations applicable on the aerodrome. In France, this is the Prefects who establishes legal texts enforcing law and order on the aerodrome. Only him is competent to exercise this power and not the aerodrome operator. These local rules apply to everyone and deal with many points that could be arrangements in this AMC. If we consider that legal texts enforcing law and order are arrangements as well, so we reckon that this AMC can be respected. Otherwise we would have a juridico-administrative impossibility.				
response	Noted The AMC foresees that the aerodrome operator should 'provide all necessary evidence for arrangements with third parties that provide or intend to provide services or undertake activities at the aerodrome, whose activities may have an impact on safety...'. The AMC is also based on the essential requirement contained in Annex Va of the Basic Regulation which foresees that: (f) 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety...'. Such arrangements are necessary for the safe operation of the aerodrome and should take place in the context of the aerodrome operator's safety management system foreseen in the Basic Regulation, identifying, inter alia, responsibilities, obligations, etc. However, the suggestion does not foresee the actual establishment of such arrangements between the aerodrome operator and the other organisations mentioned above.				
comment	1052 comment by: <i>NATS National Air Traffic Services Limited</i>				
response	Accepted The AMC will be reworded accordingly				
comment	1375 Attachment #76				comment by: <i>Euroairport Bâle-Mulhouse</i>

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR-OR.B.015(b)(3)

Référence: AMC1-ADR-OR.B.015(b)(3)
Application for a certificate
PROVISION OF EVIDENCE OF ARRANGEMENTS WITH THIRD PARTIES

Traduction de courtoisie
It is appropriate to indicate in a legal text enforcing law and order applicable on an aerodrome can be considered as an arrangement. Some rules on an aerodrome are directly ordered by the authorities through local police regulations applicable on the aerodrome. In France, this is the Prefects who establishes legal texts enforcing law and order on the aerodrome. Only him is competent to exercise this power and not the aerodrome operator. These local rules apply to everyone and deal with many points that could be arrangements in this AMC. If we consider that legal texts enforcing law and order are arrangements as well, so we reckon that this AMC can be respected. Otherwise we would have a juridico-administrative impossibility.

response

Noted

The AMC foresees that the aerodrome operator should 'provide all necessary evidence for arrangements with third parties that provide or intend to provide services or undertake activities at the aerodrome, whose activities may have an impact on safety...'.
The AMC is also based on the essential requirement contained in Annex Va of the Basic Regulation which foresees that: (f) 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety...'. Such arrangements are necessary for the safe operation of the aerodrome and should take place in the context of the aerodrome operator's safety management system foreseen in the Basic Regulation, identifying, inter alia, responsibilities, obligations, etc.
However, the suggestion does not foresee the actual establishment of such arrangements between the aerodrome operator and the other organisations mentioned above.

comment

1583

comment by: *Aéroport de Marseille - MRS/LFML*

It is appropriate to indicate in a legal text enforcing law and order applicable on an aerodrome can be considered as an arrangement.

Some rules on an aerodrome are directly ordered by the authorities through local police regulations applicable on the aerodrome. In France, this is the Prefects who establishes legal texts enforcing law and order on the aerodrome. Only him is competent to exercise this power and not the aerodrome operator.

These local rules apply to everyone and deal with many points that could be arrangements in this AMC. If we consider that legal texts enforcing law and order are arrangements as well, so we reckon that this AMC can be respected. Otherwise we would have a juridico-administrative impossibility.

response

Noted

The AMC foresees that the aerodrome operator should 'provide all necessary evidence for arrangements with third parties that provide or intend to provide services or undertake activities at the aerodrome, whose activities may have an impact on safety...'.
The AMC is also based on the essential requirement contained in Annex Va of the Basic Regulation which foresees that: (f) 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety...'. Such arrangements are necessary for the safe operation of the aerodrome and should take place in the context of the aerodrome operator's safety management system foreseen in the Basic Regulation, identifying, inter alia, responsibilities, obligations, etc.

However, the suggestion does not foresee the actual establishment of such arrangements between the aerodrome operator and the other organisations mentioned above.

comment

1833

comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#77](#)

UAF NPA 2011-20 (B.II) AMC1-ADR-OR.B.015(b)(3)

Référence: AMC1-ADR-OR.B.015(b)(3)
Application for a certificate
PROVISION OF EVIDENCE OF ARRANGEMENTS WITH THIRD PARTIES

Traduction de courtoisie
It is appropriate to indicate in a legal text enforcing law and order applicable on an aerodrome can be considered as an arrangement. Some rules on an aerodrome are directly ordered by the authorities through local police regulations applicable on the aerodrome. In France, this is the Prefects who establishes legal texts enforcing law and order on the aerodrome. Only him is competent to exercise this power and not the aerodrome operator. These local rules apply to everyone and deal with many points that could be arrangements in this AMC. If we consider that legal texts enforcing law and order are arrangements as well, so we reckon that this AMC can be respected. Otherwise we would have a juridico-administrative impossibility.

response

Noted

The AMC foresees that the aerodrome operator should 'provide all necessary evidence for arrangements with third parties that provide or intend to provide services or undertake activities at the aerodrome, whose activities may have an impact on safety...'.
The AMC is also based on the essential requirement contained in Annex Va of the Basic Regulation which foresees that: (f) 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes.

These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety...'. Such arrangements are necessary for the safe operation of the aerodrome and should take place in the context of the aerodrome operator's safety management system foreseen in the Basic Regulation, identifying, inter alia, responsibilities, obligations, etc. However, the suggestion does not foresee the actual establishment of such arrangements between the aerodrome operator and the other organisations mentioned above.

comment

1936 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

[Attachment #78](#)

ADBM - NPA 2011-20 (B.II) AMC1-ADR-OR.B.015(b)(3)

Référence: AMC1-ADR-OR.B.015(b)(3)
Application for a certificate
PROVISION OF EVIDENCE OF ARRANGEMENTS WITH THIRD PARTIES

Traduction de courtoisie

It is appropriate to indicate in a legal text enforcing law and order applicable on an aerodrome can be considered as an arrangement. Some rules on an aerodrome are directly ordered by the authorities through local police regulations applicable on the aerodrome. In France, this is the Prefects who establishes legal texts enforcing law and order on the aerodrome. Only him is competent to exercise this power and not the aerodrome operator. These local rules apply to everyone and deal with many points that could be arrangements in this AMC. If we consider that legal texts enforcing law and order are arrangements as well, so we reckon that this AMC can be respected. Otherwise we would have a juridico-administrative impossibility.

response

Noted

The AMC foresees that the aerodrome operator should 'provide all necessary evidence for arrangements with third parties that provide or intend to provide services or undertake activities at the aerodrome, whose activities may have an impact on safety...'. The AMC is also based on the essential requirement contained in Annex Va of the Basic Regulation which foresees that: (f) 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety...'. Such arrangements are necessary for the safe operation of the aerodrome and should take place in the context of the aerodrome operator's safety management system foreseen in the Basic Regulation, identifying, inter alia, responsibilities, obligations, etc. However, the suggestion does not foresee the actual establishment of such arrangements between the aerodrome operator and the other organisations mentioned above. The AMC foresees that the aerodrome

operator should 'provide all necessary evidence for arrangements with third parties that provide or intend to provide services or undertake activities at the aerodrome, whose activities may have an impact on safety...'.
The AMC is also based on the essential requirement contained in Annex Va of the Basic Regulation which foresees that: (f) 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety...'. Such arrangements are necessary for the safe operation of the aerodrome and should take place in the context of the aerodrome operator's safety management system foreseen in the Basic Regulation, identifying, inter alia, responsibilities, obligations, etc.
However, the suggestion does not foresee the actual establishment of such arrangements between the aerodrome operator and the other organisations mentioned above.

comment

1947

comment by: Pau Pyrénées Airport - PUF/LFBP

It is appropriate to indicate in a legal text enforcing law and order applicable on an aerodrome can be considered as an arrangement. But first of all it must be defined what an arrangement is.

Some rules on an aerodrome are directly ordered by the authorities through local police regulations applicable on the aerodrome. In France, this is the Prefects who establishes legal texts enforcing law and order on the aerodrome. Only him is competent to exercise this power and not the aerodrome operator.

These local rules apply to everyone and deal with many points that could be arrangements in this AMC. If we consider that legal texts enforcing law and order are arrangements as well, so we reckon that this AMC can be respected. Otherwise we would have a juridico-administrative impossibility. And an aerodrome operator will not be able and will not want to bear the responsibility of a prefect.

response

Noted

The AMC foresees that the aerodrome operator should 'provide all necessary evidence for arrangements with third parties that provide or intend to provide services or undertake activities at the aerodrome, whose activities may have an impact on safety...'.
The AMC is also based on the essential requirement contained in Annex Va of the Basic Regulation which foresees that: (f) 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety...'. Such arrangements are necessary for the safe operation of the aerodrome and should take place in the context of the aerodrome operator's safety management system foreseen in the Basic Regulation, identifying, inter alia, responsibilities, obligations, etc.
However, the suggestion does not foresee the actual establishment of such arrangements between the aerodrome operator and the other

organisations mentioned above.

comment

2373

comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

<p><u>Référence: AMC1-ADR-OR.B.015(b)(3)</u></p>	<p>Application for a certificate PROVISION OF EVIDENCE OF ARRANGEMENTS WITH THIRD PARTIES</p>
<p>Proposition/commentaire</p>	<p>Il convient d'indiquer qu'un arrêté de police (ou règlement local de police) applicable sur un aérodrome peut être considéré comme un arrangement.</p>
<p>Justification</p>	<p>Des règles, de conduite notamment, sur un aérodrome sont directement données par l'autorité par le biais de règlements locaux applicables sur l'aérodrome. En France il s'agit du préfet qui établit les arrêtés de police sur l'aérodrome, lui seul ayant la compétence d'y exercer ce pouvoir et en aucune manière l'exploitant d'aérodrome. Ces règles locales s'appliquent à tous et traitent bon nombre d'éléments qui pourraient faire l'objet des arrangements cités par cette AMC. Si nous considérons que les règles de police locale sont également des arrangements alors nous estimons que cette AMC peut être respectée. Dans le cas contraire nous aurions une impossibilité juridico-administrative.</p>
<p>Traduction de courtoisie</p>	<p>It is appropriate to indicate in a legal text enforcing law and order applicable on an aerodrome can be considered as an arrangement.</p> <p>Some rules on an aerodrome are directly ordered by the authorities through local police regulations applicable on the aerodrome. In France, this is the Prefects who establishes legal texts enforcing law and order on the aerodrome. Only him is competent to exercise this power and not the aerodrome operator.</p> <p>These local rules apply to everyone and deal with many points that could be arrangements in this AMC. If we consider that legal texts enforcing law and order are arrangements as well, so we reckon that this AMC can be respected. Otherwise we would have a juridico-administrative impossibility.</p>

response

Noted

The AMC foresees that the aerodrome operator should 'provide all necessary evidence for arrangements with third parties that provide or intend to provide services or undertake activities at the aerodrome, whose activities may have an impact on safety...'.
The AMC is also based on the essential requirement contained in Annex Va of the Basic Regulation which foresees that: (f) 'the aerodrome operator shall establish arrangements with other relevant organisations to ensure continuing compliance with these essential requirements for aerodromes. These organisations include, but are not limited to, aircraft operators, air navigation service providers, ground handling service providers and other organisations whose activities or products may have an effect on aircraft safety...'. Such arrangements are necessary for the safe operation of the aerodrome and should take place in the context of the aerodrome operator's safety management system foreseen in the Basic Regulation, identifying, inter alia, responsibilities, obligations, etc.

However, the suggestion does not foresee the actual establishment of such arrangements between the aerodrome operator and the other organisations mentioned above.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B
– CERTIFICATION (ADR.OR.B) – AMC1-ADR.OR.B.015(b)(4) –
Application for a certificate – ADEQUACY OF RESOURCES**

p. 58-59

comment

1053

comment by: *NATS National Air Traffic Services Limited*

2 comments

1. There are two AMC to ADR.OR.B.015(b)(4) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the two AMC into a single AMC.

2. This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.

response

Accepted

The number of AMC associated with a certain rule depends on the complexity of the rule and the number of issues dealt with in that rule. Thus, in certain cases, more than one AMC may be needed, in order to allow the reader to identify more easily the item of its interest, and to improve readability.

However, in this case, the Agency agrees that a single AMC may be adequate and, thus, it will merge the two AMC (AMC1 and AMC2) into a single AMC that combines both contents. In addition, it will reword the text to the extent possible to ensure improved readability and avoid

repetitions.

comment

1241

comment by: UK CAA

Page No: 58

Paragraph No: AMC1-ADR.OR.B.015 (b) (4)

Comment: Those items relating to financial issues – the amount of FTEs, labour legislation and the degree of subcontracting should be deleted.

Justification: How is the competent authority to judge whether an applicant's financial capability is suitable and properly matched to the scale and scope of the operation?

Proposed Text: DELETE amount of FTEs, labour legislation and the degree of subcontracting

response

Noted

The amount of FTEs, labour legislation and the degree of subcontracting are not directly related to financial issues, as such.

Instead, they are factors that have to be taken into account by the applicant in its analysis, in order to demonstrate that the human resources it intends to use, match the scale and scope of operations.

Thus, the applicant should establish the level of FTEs needed, taking into account any existing limitations of labour law, as well as the degree of subcontracting of activities.

The result of such analysis may, of course, be used for demonstrating the adequacy of its resources.

comment

1289

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX II - Part-OR – AMC1-ADR.OR.B.015 (b) (4) – Application for a certificate (p39-40)

2. Justification and proposed text / comment

The competent authority does not have the resources and competences to check the financial capability of an aerodrome operator.

AMC1-ADR.OR.B.015(b)(4) – Application for a certificate

"ADEQUACY OF RESOURCES

The applicant should provide all necessary information needed in order to demonstrate to the competent authority that its proposed organisation and management, ~~including its financial capability~~, are suitable and properly matched to the scale and scope of the operation.

[...]"

response

Accepted

The text will be modified in this direction.

comment	1787	comment by: AESA - Agencia Estatal de Seguridad Aérea
	Page 58/176 The applicant should provide all necessary information needed in order to demonstrate to the competent authority that its proposed organisation and management, including its financial capability, are suitable and properly matched to the scale and scope of the operation. In demonstrating such compliance the applicant should, amongst others, take into account in its analysis the following (...) <i>In order to demonstrate the financial capability, the applicant should provide the five years business plan and for existing aerodromes, the last audited financial report, as well.</i>	
response	Noted The Agency will reword the text and examine the need to provide relevant Guidance Material.	

comment	2059	comment by: AENA - Aeropuertos Españoles y Navegación Aérea
	The competent authority does not have the resources and competences to check the financial capability of an aerodrome operator. AMC1-ADR.OR.B.015(b)(4) – Application for a certificate "ADEQUACY OF RESOURCES <i>The applicant should provide all necessary information needed in order to demonstrate to the competent authority that its proposed organisation and management, including its financial capability, are suitable and properly matched to the scale and scope of the operation.</i> [...]"	
response	Accepted The text will be modified in this direction.	

comment	2132	comment by: Danish Transport Authority
	In the AMC the applicant should demonstrate its financial capability to the competent authority. In order to fulfill this AMC there should be some kind of GM on key figures needed to demonstrate/comply with the proposed provision.	
response	Noted The Agency will reword the text and examine the need to provide relevant Guidance Material.	

comment	12	comment by: <i>ACI EUROPE - Airports Council International</i>				
	delete: "..., that is contractual arrangements,..."					
response	Partially accepted					
	The text has been amended and now refers to evidence of arrangements.					
comment	182	comment by: <i>SWISS AERODROMES ASSOCIATION</i>				
	At the second paragraph, "that is contractual arrangements" should be deleted. Third parties are not always acting on arrangements bases, but sometimes by law.					
response	Partially accepted					
	The text has been amended and now refers to evidence of arrangements.					
comment	338	comment by: <i>Avinor</i>				
	AMC2.ADR.OR.B.015 (b) (4). Delete: "..., that is contractual arrangements,..."					
response	Partially accepted					
	The text has been amended and now refers to evidence of arrangements.					
comment	540	comment by: <i>Flughafen Düsseldorf GmbH</i>				
	Die Forderung der Offenlegung aller vertraglichen Vereinbarungen mit Dritten geht viel zu weit und muss daher gestrichen werden.					
response	Noted					
	The intent of the AMC is not to disclosure commercial arrangements, but to ensure that such arrangements are in place. The text has been amended and now refers to evidence of arrangements.					
comment	747	comment by: <i>ADP : Aeroports de Paris</i>				
	<table border="1"> <tr> <td>Référence: AMC2-ADR.OR.B.015(b)(4)</td> <td>Application for a certificate ARRANGEMENTS WITH PARTIES NECESSARY FOR THE OPERATION OF THE AERODROME</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Il convient de modifier l'AMC de la manière suivante : "The applicant should indicate those safety related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources." "The applicant should also provide the</td> </tr> </table>		Référence: AMC2-ADR.OR.B.015(b)(4)	Application for a certificate ARRANGEMENTS WITH PARTIES NECESSARY FOR THE OPERATION OF THE AERODROME	Proposition/commentaire	Il convient de modifier l'AMC de la manière suivante : "The applicant should indicate those safety related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources." "The applicant should also provide the
Référence: AMC2-ADR.OR.B.015(b)(4)	Application for a certificate ARRANGEMENTS WITH PARTIES NECESSARY FOR THE OPERATION OF THE AERODROME					
Proposition/commentaire	Il convient de modifier l'AMC de la manière suivante : "The applicant should indicate those safety related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources." "The applicant should also provide the					

	<p>necessary evidence needed, that is contractual arrangements, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties.”</p>
<p>Justification</p>	<p>Il ne faut considérer que les arrangements qui ont un rapport avec la sécurité (safety related) sachant que les services sur une plateforme sont très nombreux et pas toujours en rapport avec la sécurité aéroportuaire (exemple : enregistrement des bagages ou garde des parcs automobiles) et qui sortent du cadre du présent règlement. De plus, l’AESA estime que tout se règle par le biais d’arrangements contractuels entre l’exploitant et les tiers or cela est erroné car il n’y a pas toujours de tels arrangements comme par exemple entre l’exploitant d’aérodrome et l’assistant en escale d’une compagnie aérienne.</p>
<p>Traduction de courtoisie</p>	<p>It is appropriate to modify the AMC in the following way: “The applicant should indicate those safety related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources.” “The applicant should also provide the necessary evidence needed, that is contractual arrangements, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties.”</p> <p>There are many services on a platform (luggage check-in, car park guard...) not always related to airport safety and which are outside the scope of the present regulation. So, only safety related arrangements have to be considered. Moreover, the EASA reckons that everything is settled through contractual arrangements between the aerodrome operators and third parties. But this is wrong because there are not always such arrangements as, for example, between the aerodrome operator and handling services of an airline.</p>

response Partially accepted

The draft regulation and related material relate to safety issues, therefore, it is not necessary to state that the services mentioned are safety related. The text has been amended and now refers to evidence of arrangements.

comment 790 comment by: *Union des Aéroports français - UAF*

Attachment [#79](#)

UAF NPA 2011-20 (B.II) AMC2-ADR.OR.B.015(b)(4)

Référence: AMC2-ADR.OR.B.015(b)(4)
Application for a certificate
ARRANGEMENTS WITH PARTIES NECESSARY FOR THE OPERATION OF THE
AERODROME

Traduction de courtoisie

It is appropriate to modify the AMC in the following way: "The applicant should indicate **those safety** related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources." "The applicant should also provide the necessary evidence needed, ~~that is contractual arrangements~~, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties." There are many services on a platform (luggage check-in, car park guard...) not always related to airport safety and which are outside the scope of the present regulation. So, only safety related arrangements have to be considered. Moreover, the EASA reckons that everything is settled through contractual arrangements between the aerodrome operators and third parties. But this is wrong because there are not always such arrangements as, for example, between the aerodrome operator and handling services of an airline.

response Partially accepted

The draft regulation and related material relate to safety issues, therefore, it is not necessary to state that the services mentioned are safety related. The text has been amended and now refers to evidence of arrangements.

comment 1054 comment by: *NATS National Air Traffic Services Limited*

3 comments

1. There are two AMC to ADR.OR.B.015(b)(4) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the two AMC into a single AMC.
2. There is a typo in the heading "ARRANGEMENTS".

3. This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.

response Noted

comment 1153 comment by: *Cologne/Bonn Airport*
delete " ... that is contractual arrangements.."

response Partially accepted
The text has been amended and now refers to evidence of arrangements.

comment 1377 comment by: *Euroairport Bâle-Mulhouse*
Attachment [#80](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC2-ADR.OR.B.015(b)(4)
Référence: AMC2-ADR.OR.B.015(b)(4)
Application for a certificate
ARRANGEMENTS WITH PARTIES NECESSARY FOR THE OPERATION OF THE
AERODROME

Traduction de courtoisie
It is appropriate to modify the AMC in the following way: "The applicant should indicate those safety related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources."
"The applicant should also provide the necessary evidence needed, ~~that is contractual arrangements~~, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties."
There are many services on a platform (luggage check-in, car park guard...) not always related to airport safety and which are outside the scope of the present regulation. So, only safety related arrangements have to be considered.
Moreover, the EASA reckons that everything is settled through contractual arrangements between the aerodrome operators and third parties. But this is wrong because there are not always such arrangements as, for example, between the aerodrome operator and handling services of an airline.

response Partially accepted
The draft regulation and related material relate to safety issues, therefore, it is not necessary to state that the services mentioned are safety related. The text has been amended and now refers to evidence of arrangements.

comment 1509 comment by: *Geneva International Airport (ROMIG)*

Delete: "..., that is contractual arrangements,..."
These are already covered in the terms "necessary evidence"

response Partially accepted
The text has been amended and now refers to evidence of arrangements.

comment 1603 comment by: *Assaeroporti - Associazione Italiana Gestori Aeroporti*
We suggest to modify as follows:
"The applicant should also provide the necessary evidence needed, ~~that is contractual arrangements~~, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties.

response Partially accepted
The text has been amended and now refers to evidence of arrangements.

comment 1604 comment by: *Aéroport de Marseille - MRS/LFML*
It is appropriate to modify the AMC in the following way:
"The applicant should indicate those **safety related** services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources."
"The applicant should also provide the necessary evidence needed, ~~that is contractual arrangements~~, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties."
There are many services on a platform (luggage check-in, car park guard...) not always related to airport safety and which are outside the scope of the present regulation. So, only safety related arrangements have to be considered.
Moreover, the EASA reckons that everything is settled through contractual arrangements between the aerodrome operators and third parties. But this is wrong because there are not always such arrangements as, for example, between the aerodrome operator and handling services of an airline.

response Partially accepted
The draft regulation and related material relate to safety issues, therefore, it is not necessary to state that the services mentioned are safety related. The text has been amended and now refers to evidence of arrangements.

comment 1788 comment by: *AESA - Agencia Estatal de Seguridad Aérea*
Page 59/176
The applicant should also provide the necessary evidence needed, that is contractual arrangements, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties.
It should be specified what happens with new aerodromes in which operation haven't started yet.

	<p><i>This kind of aerodromes should be taken into account.</i></p>
response	<p>Noted</p> <p>The Agency believes that the AMC covers also this case; in any case, the applicant should be in a position to know how the aerodrome is planned to operate. If the applicant adopts different plans, then the relevant documentation should be updated.</p>
comment	<p>1850 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Il convient de modifier l'AMC de la manière suivante : "The applicant should indicate those safety related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources." "The applicant should also provide the necessary evidence needed, that is contractual arrangements, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties."</p> <p>Il ne faut considérer que les arrangements qui ont un rapport avec la sécurité (safety related) sachant que les services sur une plateforme sont très nombreux et pas toujours en rapport avec la sécurité aéroportuaire (exemple : enregistrement des bagages ou garde des parcs automobiles) et qui sortent du cadre du présent règlement. De plus, l'AESA estime que tout se règle par le biais d'arrangements contractuels entre l'exploitant et les tiers or cela est erroné car il n'y a pas toujours de tels arrangements comme par exemple entre l'exploitant d'aérodrome et l'assistant en escale d'une compagnie aérienne.</p>
response	<p>Partially accepted</p> <p>The draft regulation and related material relate to safety issues, therefore, it is not necessary to state that the services mentioned are safety related. With regard to the comment on the arrangements, the text will be reworded.</p>
comment	<p>1934 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to modify the AMC in the following way: "The applicant should indicate those safety related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources." "The applicant should also provide the necessary evidence needed, that is contractual arrangements, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties."</p> <p>There are many services on a platform (luggage check-in, car park guard...) not always related to airport safety and which are outside the scope of the present regulation. So, only safety related arrangements have to be considered. Moreover, the EASA reckons that everything is settled through contractual</p>

arrangements between the aerodrome operators and third parties. But this is wrong because there are not always such arrangements as, for example, between the aerodrome operator and handling services of an airline.

response Partially accepted

The draft regulation and related material relate to safety issues, therefore, it is not necessary to state that the services mentioned are safety related. The text has been amended and now refers to evidence of arrangements.

comment 1967 comment by: *Turin Airport - TRN/LIMF*

We suggest to modify as follows:

"The applicant should also provide the necessary evidence needed, ~~that is contractual arrangements,~~ if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties.

response Partially accepted

The text has been amended and now refers to evidence of arrangements.

comment 2249 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*

Delete: "..., that is contractual arrangements,...", not necessary with the term "necessary evidence.

response Partially accepted

The text has been amended and now refers to evidence of arrangements.

comment 2355 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

<p><u>Référence: AMC2-ADR.OR.B.015(b)(4)</u></p>	<p>Application for a certificate ARRANGEMENTS WITH PARTIES NECESSARY FOR THE OPERATION OF THE AERODROME</p>
<p>Proposition/commentaire</p>	<p>Il convient de modifier l'AMC de la manière suivante :</p> <p>"The applicant should indicate those safety related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources."</p> <p>"The applicant should also provide the necessary evidence needed, that is contractual arrangements, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties."</p>

<p>Justification</p>	<p>Il ne faut considérer que les arrangements qui ont un rapport avec la sécurité (safety related) sachant que les services sur une plateforme sont très nombreux et pas toujours en rapport avec la sécurité aéroportuaire (exemple : enregistrement des bagages ou garde des parcs automobiles) et qui sortent du cadre du présent règlement. De plus, l'AESA estime que tout se règle par le biais d'arrangements contractuels entre l'exploitant et les tiers or cela est erroné car il n'y a pas toujours de tels arrangements comme par exemple entre l'exploitant d'aérodrome et l'assistant en escale d'une compagnie aérienne.</p>
<p>Traduction de courtoisie</p>	<p>It is appropriate to modify the AMC in the following way: "The applicant should indicate those safety related services that are going to be provided directly by himself and those that will be provided by contacted third parties with regard to the adequacy of the resources." "The applicant should also provide the necessary evidence needed, that is contractual arrangements, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties." There are many services on a platform (luggage check-in, car park guard...) not always related to airport safety and which are outside the scope of the present regulation. So, only safety related arrangements have to be considered. Moreover, the EASA reckons that everything is settled through contractual arrangements between the aerodrome operators and third parties. But this is wrong because there are not always such arrangements as, for example, between the aerodrome operator and handling services of an airline.</p>

response Partially accepted

The draft regulation and related material relate to safety issues, therefore, it is not necessary to state that the services mentioned are safety related. The text has been amended and now refers to evidence of arrangements.

comment	2529	comment by: <i>ADV -German Airports Association</i>
	AMC2.ADR.OR.B.015 (b) (4) delete: "..., that is contractual arrangements,..."	
response	Partially accepted The text has been amended and now refers to evidence of arrangements.	
comment	2540	comment by: <i>MST / STR - Stuttgart Airport</i>
	AMC2.ADR.OR.B.015 (b) (4) delete: "..., that is contractual arrangements,..."	
response	Partially accepted The text has been amended and now refers to evidence of arrangements.	
comment	2633	comment by: <i>Fraport AG</i>
	AMC2-ADR.OR.B.015(b)(4) – Application for a certificate Editorial The applicant should also provide the necessary evidence needed, that is contractual arrangements, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties. Proposed Text The applicant should also provide the necessary evidence needed, if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed regarding such third parties. Fraport Contracts to third parties are not in the oversight of the authority	
response	Partially accepted The text has been amended and now refers to evidence of arrangements.	

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B
– CERTIFICATION (ADR.OR.B) – AMC1-ADR.OR.B.015(b)(5) –
Application for a certificate – RELATIONSHIP OF THE APPLICANT WITH
THE AERODROME OWNER**

p. 59

comment	749	comment by: <i>ADP : Aeroports de Paris</i>
	Référence: AMC1-ADR.OR.B.015(b)(5)	Application for a certificate RELATIONSHIP OF THE APPLICANT WITH THE AERODROME OWNER

<p>Proposition/commentaire</p>	<p>Question: quel est le but de ce paragraphe?</p> <p>En effet, par sa qualité même d'exploitant d'aérodrome, celui-ci est autorisé à entreprendre toutes les activités nécessaires. Il est donc inutile de vouloir en faire la démonstration à l'autorité compétente.</p> <p>"all activities": l'exploitant d'aérodrome ne peut pas entreprendre toutes les activités nécessaires entrant dans le cadre du règlement de base. Certaines sont du ressort des autorités uniquement.</p>
<p>Justification</p> <p>Traduction de courtoisie</p>	<p>Question: what is the goal of such a paragraph?</p> <p>By his/her quality of aerodrome operator, he/she is duly authorised to undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. So it is useless to demonstrate it to the competent authority.</p> <p>"all activities": the aerodrome operator cannot undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. Some activities fall under the authorities responsibility.</p>

response

Noted

The purpose of this AMC is for the applicant to provide the necessary documentation to the competent authority, regarding:

- its ability to act on behalf of the aerodrome owner if they are different legal/natural persons; and
- the ownership of the land for the aerodrome development (if this is the case).

The activities required to be undertaken by the applicant/aerodrome operator, under this draft regulation, are different from those of the competent authority.

comment 870

comment by: *Union des Aéroports français - UAF*

Attachment [#81](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.OR.B.015(b)(5)

Référence: AMC1-ADR.OR.B.015(b)(5)
 Application for a certificate
 RELATIONSHIP OF THE APPLICANT WITH THE AERODROME OWNER

Traduction de courtoisie
 Question: what does the EASA exactly expect with such a paragraph?
 We notice a logical problem: by his/her quality of aerodrome operator,
 he/she is duly authorised to undertake all activities necessary under the
 provisions of the Basic Regulation and its Implementing Rules is and
 another applicable national or Community rule. So it is useless to
 demonstrate it to the competent authority.
 "all activities": the aerodrome operator cannot undertake all activities
 necessary under the provisions of the Basic Regulation and its
 Implementing Rules is and another applicable national or Community rule.
 Some activities fall under the authorities responsibility.

response

Noted

The purpose of this AMC is for the applicant to provide the necessary documentation to the competent authority, regarding:

- its ability to act on behalf of the aerodrome owner if they are different legal/natural persons; and
- the ownership of the land for the aerodrome development (if this is the case).

The activities required to be undertaken by the applicant/aerodrome operator, under this draft regulation, are different from those of the competent authority.

comment

1055 comment by: *NATS National Air Traffic Services Limited*

This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database

response

Noted

comment

1357 comment by: *Euroairport Bâle-Mulhouse*

Attachment [#82](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.B.015(b)(5)

Référence: AMC1-ADR.OR.B.015(b)(5)
 Application for a certificate
 RELATIONSHIP OF THE APPLICANT WITH THE AERODROME OWNER

Traduction de courtoisie
 Question: what does the EASA exactly expect with such a paragraph?
 We notice a logical problem: by his/her quality of aerodrome operator,

he/she is duly authorised to undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. So it is useless to demonstrate it to the competent authority. "all activities": the aerodrome operator cannot undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. Some activities fall under the authorities responsibility.

response

Noted

The purpose of this AMC is for the applicant to provide the necessary documentation to the competent authority, regarding:

- its ability to act on behalf of the aerodrome owner if they are different legal/natural persons; and
- the ownership of the land for the aerodrome development (if this is the case).

The activities required to be undertaken by the applicant/aerodrome operator, under this draft regulation, are different from those of the competent authority.

comment

1562 comment by: *Aéroport de Marseille - MRS/LFML*

response

Noted

comment

1827 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#83](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.OR.B.015(b)(5)

Référence: AMC1-ADR.OR.B.015(b)(5)
 Application for a certificate
 RELATIONSHIP OF THE APPLICANT WITH THE AERODROME OWNER

Traduction de courtoisie
 Question: what does the EASA exactly expect with such a paragraph?
 We notice a logical problem: by his/her quality of aerodrome operator, he/she is duly authorised to undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. So it is useless to demonstrate it to the competent authority. "all activities": the aerodrome operator cannot undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. Some activities fall under the authorities responsibility.

response

Noted

The purpose of this AMC is for the applicant to provide the necessary documentation to the competent authority, regarding:

- its ability to act on behalf of the aerodrome owner if they are

different legal/natural persons; and

- the ownership of the land for the aerodrome development (if this is the case).

The activities required to be undertaken by the applicant/aerodrome operator, under this draft regulation, are different from those of the competent authority.

comment

1932

comment by: *Pau Pyrénées Airport - PUF/LFBP*

Question: what does the EASA exactly expect with such a paragraph?

We notice a logical problem: by his/her quality of aerodrome operator, he/she is duly authorised to undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. So it is useless to demonstrate it to the competent authority.

"all activities": the aerodrome operator cannot undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. Some activities fall under the authorities responsibility.

response

Noted

The purpose of this AMC is for the applicant to provide the necessary documentation to the competent authority, regarding:

- its ability to act on behalf of the aerodrome owner if they are different legal/natural persons; and
- the ownership of the land for the aerodrome development (if this is the case).

The activities required to be undertaken by the applicant/aerodrome operator, under this draft regulation, are different from those of the competent authority.

comment

1938

comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#84](#)

ADBM - NPA 2011-20 (B.II) AMC1-ADR.OR.B.015(b)(5)

Référence: AMC1-ADR.OR.B.015(b)(5)
Application for a certificate
RELATIONSHIP OF THE APPLICANT WITH THE AERODROME OWNER

Traduction de courtoisie
Question: what does the EASA exactly expect with such a paragraph?
We notice a logical problem: by his/her quality of aerodrome operator, he/she is duly authorised to undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. So it is useless to demonstrate it to the competent authority.
"all activities": the aerodrome operator cannot undertake all activities

response

necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. Some activities fall under the authorities responsibility.

Noted

The purpose of this AMC is for the applicant to provide the necessary documentation to the competent authority, regarding:

- its ability to act on behalf of the aerodrome owner if they are different legal/natural persons; and
- the ownership of the land for the aerodrome development (if this is the case).

The activities required to be undertaken by the applicant/aerodrome operator, under this draft regulation, are different from those of the competent authority.

comment

2358 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

<p>Référence: AMC1-ADR.OR.B.015(b)(5)</p>	<p>Application for a certificate RELATIONSHIP OF THE APPLICANT WITH THE AERODROME OWNER</p>
<p>Proposition/commentaire</p>	<p>Question: que souhaite exactement l'AESA avec un tel paragraphe?</p> <p>Nous constatons un problème de logique: par sa qualité même d'exploitant d'aérodrome, celui-ci est autorisé à entreprendre toutes les activités nécessaires. Il est donc inutile de vouloir en faire la démonstration à l'autorité compétente.</p> <p>"all activities": l'exploitant d'aérodrome ne peut pas entreprendre toutes les activités nécessaires entrant dans le cadre du règlement de base. Certaines sont du ressort des autorités uniquement.</p>
<p>Justification</p>	
<p>Traduction de courtoisie</p>	<p>Question: what does the EASA exactly expect with such a paragraph?</p> <p>We notice a logical problem: by his/her quality of aerodrome operator, he/she is duly authorised to undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. So it is useless to demonstrate it to the competent authority.</p>

	<p>"all activities": the aerodrome operator cannot undertake all activities necessary under the provisions of the Basic Regulation and its Implementing Rules is and another applicable national or Community rule. Some activities fall under the authorities responsibility.</p>
<p>response</p>	<p>Noted</p> <p>The purpose of this AMC is for the applicant to provide the necessary documentation to the competent authority, regarding:</p> <ul style="list-style-type: none"> • its ability to act on behalf of the aerodrome owner if they are different legal/natural persons; and • the ownership of the land for the aerodrome development (if this is the case). <p>The activities required to be undertaken by the applicant/aerodrome operator, under this draft regulation, are different from those of the competent authority.</p>

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B – CERTIFICATION (ADR.OR.B) – AMC1-ADR.OR.B.015(b)(8) – Application for a certificate – AERODROME MANUAL p. 59

<p>comment</p>	<p>1056 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>There is no "should" in this AMC. Suggest making the text GM.</p>
<p>response</p>	<p>Noted</p> <p>The use of 'should' is not necessarily associated with an AMC. The purpose of this AMC is to provide a means to comply with the requirement, which is the submission of the aerodrome manual in electronic format.</p>

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B – CERTIFICATION (ADR.OR.B) – GM1-ADR.OR.B.015 – Application for a certificate – INITIAL INTEREST p. 59-60

<p>comment</p>	<p>1057 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>There are multiple "should" in this GM implying that some are AMC rather than GM. Suggest adjusting the text to be AMC/GM as appropriate.</p>
<p>response</p>	<p>Noted</p>
<p>comment</p>	<p>1508 comment by: <i>ECA - European Cockpit Association</i></p> <p>Comment:</p>

	Local pilots' association should be invited to attend this first meeting of initial interest.
	Justification: By this participation, concerns and issues could be shared well in advance to ease the process of certification.
response	Noted

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B – CERTIFICATION (ADR.OR.B) – GM2-ADR.OR.B.015(b)(1);(2);(3) – Application for a certificate – AERODROME BOUNDARIES	p. 60
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comment	290 comment by: <i>BAA Airside operations</i> GM2-ADR.OR.B.015(b) 1,2,3. BAA supports this proposal for the applicant to define the boundary of the certification area. It is important to not include inappropriate areas and this is a sensible proposal.
response	Noted

comment	298 comment by: <i>CAA Austria - Ministry of Transport</i> "Any developments and activities outside of the aerodrome boundary but adjacent to it should be subject to the aerodrome operator's safety management system" has to be clarified. In which way and which activities can a safety management system control outside the boundary of an aerodrome?
response	Noted The text has been removed.

comment	333 comment by: <i>Edinburgh Airport</i> GM2-ADR.OR.B.015 (b) 1,2,3 - Support Edinburgh Airport supports this proposal to define the boundary of the certification area. It is important to not include inappropriate area.
response	Noted

comment	552 comment by: <i>Vienna International Airport</i> "Any developments and activities outside....subject to the aerodrome operators safety management system" How shall an aerodrome operators SMS control activities outside the boundary of an aerodrome?
response	Noted The text has been removed.

comment	576	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Dritter Abschnitt: Es ist unklar auf was sich hier bezogen wird! Hindernisfreiheit? Andere Aktivitäten außerhalb der Flughafengrenzen können wegen geringer Einflussnahme und mangels Verpflichtung zur Weitergabe von Informationen an den Flughafen kaum Teil des SMS sein.	
response	Noted	
	The text has been removed.	

comment	585	comment by: <i>Belfast International Airport - BFS/EGAA</i>
	Strongly agree	
response	Noted	

comment	745	comment by: <i>ADP : Aeroports de Paris</i>								
	<table border="1"> <tr> <td>Référence: GM2-ADR.OR.B.015(b)(1);(2);(3)</td> <td>GM2-ADR.OR.B.015(b)(1);(2);(3) – Application for a certificate AERODROME BOUNDARIES</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Il convient de supprimer le dernier paragraphe de ce GM.</td> </tr> <tr> <td>Justification</td> <td>Ce qui se situe à l'extérieur de l'aérodrome ne peut pas être du ressort de son système de gestion de la sécurité car l'exploitant d'aérodrome n'a pas le pouvoir d'agir à l'extérieur des limites de son aérodrome.</td> </tr> <tr> <td>Traduction de courtoisie</td> <td>It is appropriate to delete the last paragraph from this GM. What is situated outside the aerodrome cannot be the responsibility of its safety management system because the aerodrome operator cannot have the power to act outside the limits of his/her aerodrome.</td> </tr> </table>		Référence: GM2-ADR.OR.B.015(b)(1);(2);(3)	GM2-ADR.OR.B.015(b)(1);(2);(3) – Application for a certificate AERODROME BOUNDARIES	Proposition/commentaire	Il convient de supprimer le dernier paragraphe de ce GM.	Justification	Ce qui se situe à l'extérieur de l'aérodrome ne peut pas être du ressort de son système de gestion de la sécurité car l'exploitant d'aérodrome n'a pas le pouvoir d'agir à l'extérieur des limites de son aérodrome.	Traduction de courtoisie	It is appropriate to delete the last paragraph from this GM. What is situated outside the aerodrome cannot be the responsibility of its safety management system because the aerodrome operator cannot have the power to act outside the limits of his/her aerodrome.
Référence: GM2-ADR.OR.B.015(b)(1);(2);(3)	GM2-ADR.OR.B.015(b)(1);(2);(3) – Application for a certificate AERODROME BOUNDARIES									
Proposition/commentaire	Il convient de supprimer le dernier paragraphe de ce GM.									
Justification	Ce qui se situe à l'extérieur de l'aérodrome ne peut pas être du ressort de son système de gestion de la sécurité car l'exploitant d'aérodrome n'a pas le pouvoir d'agir à l'extérieur des limites de son aérodrome.									
Traduction de courtoisie	It is appropriate to delete the last paragraph from this GM. What is situated outside the aerodrome cannot be the responsibility of its safety management system because the aerodrome operator cannot have the power to act outside the limits of his/her aerodrome.									
response	Noted									
	The text has been removed.									

comment	748	comment by: <i>Airport Nuremberg - NUE/EDDN</i>
	The aerodrome safety management system cannot be responsible for developments and activities outside the boundary of the aerodrome. There is no possibility for physical or legal action to prevent risks or eliminate such developments and activities by the safety management system. This should further, as practiced today, be solely in response of the competent	

local authority.

response Noted
The text has been removed.

comment **871** comment by: *Union des Aéroports français - UAF*
Attachment [#85](#)
UAF NPA 2011-20 (B.II) GM2-ADR.OR.B.015(b)(1);(2);(3)
Réf rence: GM2-ADR.OR.B.015(b)(1);(2);(3)
Application for a certificate
AERODROME BOUNDARIES
Traduction de courtoisie
It is appropriate to delete the last paragraph from this GM.
What is situated outside the aerodrome cannot be the responsibility of its
safety management system because the aerodrome operator cannot have
the power to act outside the limits of his/her aerodrome.

response Noted
The text has been removed.

comment **1011** comment by: *Bristol Airport - BRS/EGGD*

GM2-ADR.OR.B.015(b) 1,2,3	Support	Bristol Airport supports this proposal for the applicant to define the boundary of the certification area. It is important to not include inappropriate areas and this is a sensible proposal.
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response Noted

comment **1058** comment by: *NATS National Air Traffic Services Limited*
There are multiple "should" in this GM implying that some are AMC rather than GM. Suggest adjusting the text to be AMC/GM as appropriate.

response Noted

comment **1162** comment by: *Gatwick Airport Ltd*
Support
AOA supports this proposal for the applicant to define the boundary of the certification area. It is important to not include inappropriate areas and this is a sensible proposal.

response Noted

comment **1166** comment by: *Salzburger Flughafen GmbH*

	"Any developments and activities outside...subject to the aerodrome operators safety management system" How shall an aerodrome operators SMS control activities outside the boundary of an aerodrome?
response	Noted The text has been removed.

comment	1242 comment by: UK CAA Page No: 60 Paragraph No: GM2-ADR.OR.B.015 (b) (1); (2); (3) Comment: 'Any developments and activities outside of the aerodrome boundary but adjacent to it should be subject to the aerodrome operator's safety management system.' How is this to be measured? How far out does this extend? Who decides? Justification: Clarity is needed on this item. Proposed Text: 'Any developments and activities outside the aerodrome boundary but adjacent to it, and within the control of the aerodrome operator , should be subject to the aerodrome operator's safety management system. Examples include landside areas such as car parks, offices and other infrastructure '.
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response	Noted The text has been removed.
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comment	1394 comment by: Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH "Any developments and activities outside....subject to the aerodrome operators safety management system" How shall an aerodrome operators SMS control activities outside the boundary of an aerodrome?
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response	Noted The text has been removed.
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comment	1461 comment by: Flughafen Graz Betriebs GmbH "Any developments and activities outside....subject to the aerodrome operators safety management system" How shall an aerodrome operators SMS control activities outside the boundary of an aerodrome?
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response	Noted The text has been removed.
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comment	<p>1591 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>It is appropriate to delete the last paragraph from this GM.</p> <p>What is situated outside the aerodrome cannot be the responsibility of its safety management system because the aerodrome operator cannot have the power to act outside the limits of his/her aerodrome.</p>
response	<p>Noted</p> <p>The text has been removed.</p>
comment	<p>1614 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i></p> <p>"Any developments and activities outside....subject to the aerodrome operators safety management system"</p> <p>How shall an aerodrome operators SMS control activities outside the boundary of an aerodrome?</p>
response	<p>Noted</p> <p>The text has been removed.</p>
comment	<p>1660 comment by: <i>Stansted Airport</i></p> <p>GM2-ADR.OR.B.015(b) 1,2,3</p> <p>Support</p> <p>Stansted Airport supports this proposal for the applicant to define the boundary of the certification area. It is important to not include inappropriate areas and this is a sensible proposal.</p>
response	<p>Noted</p>
comment	<p>1935 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #86</p> <p>ADBM - NPA 2011-20 (B.II) GM2-ADR.OR.B.015(b)(1);(2);(3)</p> <p>Référence: GM2-ADR.OR.B.015(b)(1);(2);(3) Application for a certificate AERODROME BOUNDARIES</p> <p>Traduction de courtoisie</p> <p>It is appropriate to delete the last paragraph from this GM. What is situated outside the aerodrome cannot be the responsibility of its safety management system because the aerodrome operator cannot have the power to act outside the limits of his/her aerodrome.</p>
response	<p>Noted</p>

	The text has been removed.
comment	<p>1944 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to delete the last paragraph from this GM.</p> <p>What is situated outside the aerodrome cannot be the responsibility of its safety management system because the aerodrome operator cannot have the power to act outside the limits of his/her aerodrome.</p>
response	<p>Noted</p> <p>The text has been removed.</p>
comment	<p>1984 comment by: <i>Munich Airport International</i></p> <p><u>(b)</u></p> <p>(4): delete: "..., that is contractual arrangements,..."</p>
response	<p>Partially accepted</p> <p>The text has been amended and now refers to evidence of arrangements.</p>
comment	<p>2078 comment by: <i>Infratil Airports Europe Ltd</i></p> <p>Page No: 60</p> <p>Paragraph No: GM2-ADR.OR.B.015(b) 1,2,3</p> <p>Comment IAEL supports this proposal for the applicant to define the boundary of the certification area. It is important to not include inappropriate areas and this is a sensible proposal</p>
response	<p>Noted</p>
comment	<p>2097 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>GM2-ADR.OR.B015b 1, 2, 3 - The map attached to the application for an aerodrome certificate should show the boundary of the area subject to certification. Support this clarification.</p>
response	<p>Noted</p>
comment	<p>2129 comment by: <i>Aberdeen Airport Airside Operations</i></p> <p>(b) 1,2,3 Support</p> <p>BAA Aberdeen Airport supports this proposal for the applicant to define the boundary of the certification area. It is important to not include inappropriate areas and this is a sensible approach</p>
response	<p>Noted</p>
comment	<p>2160 comment by: <i>Vereinigung der Dienstleister an Deutschen</i></p>

	<i>Flughäfen e.V. (VDF)</i>
	The applicant should indicate those services that are going to be provided directly by himself and those that will be provided by contracted third parties. Again the question arises if the ground handling providers who have an approval according to the proposal for a regulation of the European Parliament and of the Council on ground handling services at Union airports and repealing Council Directive 96/67/EC are seen as contracted third parties.
response	Noted The Agency follows the relevant works on the amendment of the relevant EU law in the area of ground handling.
comment	2184 comment by: <i>Flughafen Klagenfurt</i> "Any developments and activities outside..... subject to the aerodrome operators safety management system" How shall an aerodrome operators SMS control activities outside the boundary of an aerodrome?
response	Noted The text has been removed.
comment	2439 comment by: <i>London Biggin Hill Airport</i> GM2.ADR.OR.B.015 (b) (1);(2);(3) We fully support this proposal for the applicant to define the boundary of the certification area. It is important to not include inappropriate areas and this is a sensible proposal.
response	Noted

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B – CERTIFICATION (ADR.OR.B) – AMC1-ADR.OR.B.040(a) – Changes p. 60-61 – CHANGES REQUIRING PRIOR APPROVAL

comment	59 comment by: <i>CAA Norway</i> Editorial: The reference given in (a)(4) must be to ADR.OR.B.045, not ADR.OR.B.065
response	Accepted The Agency has amended the relevant reference.
comment	102 comment by: <i>CAA Norway</i> The requirement for prior approval in AMC1-ADR.OR.B.040(a), (b)(5) on page 61 must be only for permanent changes in the level of the rescue and fire-fighting services. The aerodrome must be allowed to lower the level in accordance with the actual traffic at the aerodrome. (E.g. if you only have Cat 4 aircraft for a period, the level provided need not exceed

	Cat 4, but has to be published by NOTAM.)
response	Accepted The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements.
comment	103 comment by: CAA Norway AMC1-ADR.OR.B.040(a), (b)(7) on page 61: Changes related to fuel provision should not be a change requiring prior approval. We suggest to delete this item.
response	Accepted
comment	159 comment by: Swedavia AB - Swedish airports (currently 11 airports) (a) Will create extra administrative workload for the Operator and for the CAA. Add "permanent" before changes. (b) (5) This must be only for permanent changes in the level of the rescue and fire-fighting services. The aerodrome must be allowed to lower the level in accordance with the actual traffic at the aerodrome. If you only have Cat 4 aircraft for a period, the level provided need not exceed Cat 4, but has to be published by NOTAM.
response	Accepted The text of the AMC reflects the text of the relevant Implementing Rules' requirements on the terms of approval of the certificate. Based on the amendments made to the content of terms of approval to the certificate, the text of the AMC is also amended in the suggested direction.
comment	183 comment by: SWISS AERODROMES ASSOCIATION The scope of changes requiring prior approval is too wide and too detailed. Changes requiring prior approval must be related to aerodrome operational issues and the Member States should be free to adapt this list. Changes related to fuel provisions do not require prior approval.
response	Partially accepted The text of the AMC reflects the text of the relevant Implementing Rules' requirements on the terms of approval of the certificate. Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is also amended, in the suggested direction with regard to fuel provision. However, the Agency has the view that it is necessary to clearly define what kind of changes require prior competent authority approval.

comment	318	comment by: <i>CAA Austria - Ministry of Transport</i>
	(b)(5) Due to operational reasons of the RFFS vehicles (maintenance, etc.) the aerodromes sometimes have to downgrade the level of protection without approval of the change .Change the sentence: permanent change in the level of the rescue and fire-fighting services	
response	Accepted	
	The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements.	
comment	426	comment by: <i>Estonian CAA</i>
	The requirement for prior approval in AMC1-ADR.OR.B.040(a), (b)(5) on page 61 must be only for permanent changes in the level of the rescue and fire-fighting services. The aerodrome must be allowed to lower the level in accordance with the actual traffic at the aerodrome. (E.g. if you only have Cat 4 aircraft for a period, the level provided need not exceed Cat 4, but has to be published by NOTAM.)	
response	Accepted	
	The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements.	
comment	427	comment by: <i>Estonian CAA</i>
	AMC1-ADR.OR.B.040(a), (b)(7) on page 61: Changes related to fuel provision should not be a change requiring prior approval. We suggest to delete this item.	
response	Accepted	
	The text of the AMC reflects the text of the relevant Implementing Rules' requirements on the terms of approval of the certificate. Based on the amendments made to the content of terms of approval to the certificate, the text of the AMC is also amended, in the suggested direction.	
comment	466	comment by: <i>Icelandic Civil Aviation Administration</i>
	Editorial: The reference made in AMC1-ADR.OR.B.040(a), (a)(4) on page 61 must be to ADR.OR.B.045, not ADR.OR.B.065	
response	Accepted	
	The Agency has amended the relevant reference.	
comment	467	comment by: <i>Icelandic Civil Aviation Administration</i>
	The requirement for prior approval in AMC1-ADR.OR.B.040(a), (b)(5) on page 61 must be only for permanent changes in the level of the rescue	

and fire-fighting services. The aerodrome must be allowed to lower the level in accordance with the actual traffic at the aerodrome. (E.g. if you only have Cat 4 aircraft for a period, the level provided need not exceed Cat 4, but has to be published by NOTAM.)

response

Accepted

The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements

comment

468

comment by: *Icelandic Civil Aviation Administration*

AMC1-ADR.OR.B.040(a), (b)(7) on page 61: Changes related to fuel proviison should not be a change requiring prior approval. We suggest to delete this item.

response

Accepted

The text of the AMC reflects the text of the relevant Implementing Rules' requirements on the terms of approval of the certificate. Based on the amendments made to the content of terms of approval to the certificate, the text of the AMC is also amended in the suggested direction.

comment

577

comment by: *Flughafen Düsseldorf GmbH*

a) 4) Ist der Bezug ADR.OR.B.065 hier richtig?

response

Accepted

The Agency has amended the relevant reference.

comment

590

comment by: *Exeter International Airport*

AMC1-ADR.)R.B.040(a) (b) - Addition should be made to limit to those changes that affect the operational safety management of the aerodrome.

response

Noted

Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is also amended. In any case, all changes requiring prior approval should undergo the relevant process.

comment

750

comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR.OR.B.040(a) (b)	Changes CHANGES REQUIRING PRIOR APPROVAL
Proposition/commentaire	(b) Il convient de transférer le (b) en Guidance Materials.
Justification	(b) Ce ne sont que des exemples donc leur place est en GM.

	Les points (4) et (7) du (b) ne sont pas assez précis et risquent d'engendrer une lourdeur administrative trop importante pour l'exploitant d'aérodrome.
Traduction de courtoisie	(b) It is appropriate to transfer the (b) to GM because they are only examples. The points (4) and (7) of the (b) are not precise enough and there is a risk of administrative red tapes too important for the aerodrome operator.

response

Accepted

Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, paragraph (b) is turned into Guidance Material, while the change to fuel provision is removed.

comment

796

comment by: *Finnish Transport Safety Agency*

The requirement for prior approval in AMC1-ADR.OR.B.040(a), (b)(5) on page 61 must be only for permanent changes in the level of the rescue and fire-fighting services. The aerodrome must be allowed to lower the level in accordance with the actual traffic at the aerodrome. (E.g. if you only have Cat 4 aircraft for a period, the level provided need not exceed Cat 4, but has to be published by NOTAM.)

response

Accepted

The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements.

comment

797

comment by: *Finnish Transport Safety Agency*

AMC1-ADR.OR.B.040(a), (b)(7) on page 61: Changes related to fuel provision should not be a change requiring prior approval. We suggest to delete this item.

response

Accepted

The text of the AMC reflects the text of the relevant Implementing Rules' requirements on the terms of approval of the certificate. Based on the amendments made to the content of terms of approval to the certificate, the text of the AMC is also amended, in the suggested direction.

comment

855 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.A.015 (d) — Means of compliance (p16-17)
- ANNEX I - Part-AR - ADR.AR.B.005 (d) — Management system (p20)
- ANNEX I - Part-AR - ADR.AR.C.040(f) – Changes (26-27)
- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.B.005(d) — Management system (p13-14)
- AMC/GM to ANNEX I — Part-AR — AMC1 -ADR.AR.C.040(f) — Changes (p31-32)
- AMC/GM to ANNEX I — Part-AR — AMC3 -ADR.AR.C.040(a);(f) — Changes (p32-33)
- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.035(a)(3) – Changes (p28)
- AMC/GM to ANNEX I — Part-AR - GM1-ADR.AR.C.040(c) – Changes (p33)
- ANNEX II - Part-OR – ADR-OR.B.040(a) – Changes (p41-42)
- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.B.040(a) — Changes (p60-61)

This comment is linked with comment number 1101 in book I.

2. General comment

These paragraphs lead to many formal exchanges that are not always relevant and that considerably increase the administrative burden of:

- both the EASA and the competent authority for ADR.AR.A.015 (d), ADR.AR.B.005 (d) and the corresponding acceptable means of compliance and
- both the aerodrome operator and the competent authority for ADR.AR.C.040(f) and the corresponding acceptable means of compliance.

3. Justification and proposed text / comment

- Paragraph (d) of ADR.AR.A.015

Minor alternative AMC to the ones proposed by EASA may be accepted, due to local special constraints. In order to avoid administrative burden both for the EASA and the competent authority, it is proposed to only notify the “significant” alternative AMC, i.e. the ones which differs notably from the EASA's ones and the ones that will be applied on a national scale. Paragraph (d) of ADR.AR.A.015 requires notification of these alternatives AMC to all other Member States which amplifies considerably the aforementioned administrative burden, in particular for AMC that may not be usable or relevant for other aerodromes.

Paragraph (d) of ADR.AR.A.015 also implies that alternative AMC that could be possibly rejected by EASA will be notified to other Member States, without them knowing of the acceptability the alternative AMC. It is proposed to delete this requirement and let EASA informs all the Member States (for example, through a website) of the AMC that are deemed acceptable.

In order to limit the administrative burden to the most pertinent, DGAC proposes the following modifications of ADR.AR.A.015:

ADR.AR.A.015 — Means of compliance

“ [...]”

(d) [...] When the competent authority finds that the alternative means of compliance proposed by the aerodrome operator or the provider of apron management services are in accordance with the Implementing Rules, it shall without undue delay:

(1) notify the applicant that the alternative means of compliance may be implemented and, if applicable, amend the approval or certificate of the applicant accordingly;

(2) notify the Agency of their content of the significant ones, including copies of the relevant documentation;

~~(3) inform other Member States about alternative means of compliance that were accepted.~~

(e) [...] The competent authority shall provide the Agency with a full description of the significant alternative means of compliance, including any revisions to procedures that may be relevant, as well as an assessment demonstrating that the Implementing Rules are met. "

- Paragraph (d) of ADR.AR.B.005 and AMC1-ADR.AR.B.005 (d)

The adaptation of the procedures of the competent authority is a living and ongoing processes. In order to avoid administrative burden both for the competent authority and the EASA, DGAC proposes to only notify the most significant amendments of the procedures.

ADR.AR.B.005 – Management system

" [...]

(d) A copy of the procedures related to the management system and their significant amendments shall be made available to the Agency for the purpose of standardisation."

AMC1-ADR.AR.B.005 (d) – Management system

"PROCEDURES AVAILABLE TO THE AGENCY

(a) Copies of the procedures in the competent authority's management system should be made available to the Agency for the purpose of standardisation. These should include any significant amendments to the procedures. The procedures should provide at least the following information:

[...]"

- Paragraph (f) of ADR.AR.C.040 and AMC1-ADR.AR.C.040(f)

The tasks allocated to the competent authority for "changes not requiring prior approval" are as high as for those requiring prior approval which is not pertinent.

Considering the numerous changes notified to the competent authority, this would lead to high workload incompatible with available resources.

Furthermore, since every change would be thoroughly examined by the competent authority and providing no comment would be considered as implied approval, this would remove responsibility for the change from the aerodrome operator to the competent authority.

This is a **critical** point for DGAC that proposes the following changes to deal with it:

ADR.AR.C.040 – Changes

"[...] (f) For changes not requiring prior approval, the competent authority shall assess the information provided in the notification sent by the aerodrome operator in accordance with ADR.OR.B.040 to verify

~~compliance with the Certification Specifications basis issued by the Agency and the applicable requirements, as appropriate. In case of any non-compliance, the competent authority shall:~~

~~(1) notify the aerodrome operator about the non-compliance and request further changes; and~~

~~(2) in case of level 1 or level 2 findings, act in accordance with Article ADR.AR.C.055.~~

~~[...]"~~

AMC1 -ADR.AR.C.040(f) – Changes – page 31

~~"CHANGES NOT REQUIRING PRIOR APPROVAL~~

~~(a) Upon receiving a notification of a change that does not require a prior approval, the competent authority should:~~

~~(1) assess the change in relation to is compliant with the certification basis and the applicable requirements of Part ADR.OR, Part ADR.OPS, as well as any other applicable requirements;~~

~~(2) assess if the aerodrome operator has identified all the certification specifications, applicable requirements of Part ADR.OR, Part ADR.OPS, or other applicable requirements which are related to or affected by the change, as well as any cases related to demonstration of an equivalent level of safety;~~

~~(3) assess the actions proposed by the aerodrome operator in order to show compliance with (1) and (2) above;~~

~~(4) review and assess the content of the changes to the aerodrome manual; and;~~

~~(5) evaluate check that the safety assessment that has been submitted by the aerodrome operator, in accordance with AMC1 ADR.AR.C.035(b) and verify its compliance with ADR.OR.B.065 coordinated with third parties, and that it properly identifies risks and mitigation means.~~

~~[...]"~~

- AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33) and GM1-ADR.AR.C.035(a)(3) – Changes (p28)

In paragraph (a), the changes in nominated persons should not be transmitted to the competent authority as they are not significant safety related matter. The competency of nominated persons should be assessed by the aerodrome operator within its SMS, and the authority will oversee the SMS functioning is adequate, but not assess directly the competency of aerodrome operator staff. The word "qualification" should be avoided (see comment n°869 on qualifications). It is consequently proposed to delete this paragraph.

In paragraph (c): only significant amendments of the management system documentation should be notified to the competent authority.

It is consequently proposed to modify AMC3 -ADR.AR.C.040(a);(f) – Changes as follows :

AMC3 -ADR.AR.C.040(a);(f) – Changes (p32-33)

GENERAL

~~(a) Changes in nominated persons: The competent authority should be informed of any changes to personnel specified in Part ADR.OR that may affect the certificate or the terms of approval attached to it. When an aerodrome operator submits the name of a nominee for the nominated persons mentioned in ADR.OR.D.015, the competent authority should~~

~~assess his/her qualifications and may interview the nominee or call for additional evidence of his/her suitability before deciding upon his/her acceptability (see GM1-ADR.AR.C.035(a)(3)).~~

~~(b) A documented systematic approach should be used for maintaining the information on when an amendment was received by the competent authority and when it was approved.~~

~~(c) The competent authority should receive from the aerodrome operator each **significant** management system documentation amendment, including amendments that do not require prior approval by the competent authority. Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should indicate its approval in writing. Where the amendment does not require prior approval, the competent authority should acknowledge receipt in writing within the time limits existing under the relevant national legislation.~~

~~[...]"~~

and delete GM1-ADR.AR.C.035(a)(3) – Changes

GM1-ADR.AR.C.040(c)

It is agreed that any changes to the terms of approval of the certificate should be prior approved by the competent authority. However, this does not systematically lead to the formal change of the certificate itself : for a temporary change the formal process of modifying the certificate might take longer than the changes itself.

It is proposed to modify GM1-ADR.AR.C.040(c) : change "~~irrespective of their magnitude~~" by "**where appropriate**"

- Paragraph (a) of ADR.OR.B.040 and AMC1-ADR.OR.B.040(a)

Paragraph (a)(3) of ADR.OR.B.040 is not clear on which entity (the competent authority or the aerodrome operator) decides whether a change needs to be approved by the competent authority or not. DGAC proposes modify it to indicate more explicitly that these changes are those that the competent authority finds necessary to be approved:

ADR.OR.B.040 – Changes

~~"(a) Any **significant** change affecting:~~

~~(1) the terms of approval of the certificate; or~~

~~(2) any of the elements of the operator's management system as required in ADR.OR.D.005 (b)(1), (b)(3), (b)(4), (b)(6) and (b)(7); or~~

~~(3) any additional elements notified to the competent authority in accordance with paragraph (c) but ~~found necessary to be approved by the competent authority~~ found necessary by the competent authority to be approved,~~

~~shall require prior approval by the competent authority.~~

~~[...]"~~

Paragraph (b) of AMC1-ADR.OR.B.040(a) gives too much details while flexibility is needed and the changes requiring prior approval by the competent authority are already defined in accordance with paragraph (a) and (c) of ADR.OR.B.040. It is essential to delete this paragraph to prevent from useless increased administrative burden between the aerodrome operator and the competent authority.

AMC1-ADR.OR.B.040(a) – Changes

"CHANGES REQUIRING PRIOR APPROVAL

[...]

(b) Examples of such changes include, but are not limited to, the following:-

(1) changes to the physical characteristics of a runway; such as:

(i) new runway(s): a development resulting in the construction of a 'new' runway (e.g. new construction, or the change of an existing grass surface to a paved surface);

(ii) runway extension or shortening resulting in an amendment to declared distances;-

(iii) threshold relocation (Instrument Status): a development involving relocation of the instrument runway threshold, or relocation of a non-instrument runway threshold in preparation for instrument status;

(iv) changes to runway designation.

(2) changes of the aerodrome visual aids or other changes to the aerodrome, when such changes are associated with a change (upgrade or downgrade) of the intended operations (e.g. to accommodate low visibility operations and/or night operations);

(3) changes in the aerodrome operating minima;

(4) change that affects the obstacle limitation surfaces associated with approved type of approaches;

(5) change in the level of the rescue and fire fighting services;

(6) changes in the organisational structure of the organisation, including responsibilities, and accountabilities;

(7) changes related to fuel provision."

response

Partially accepted

Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, paragraph (b) is turned into Guidance Material, while the change to fuel provision is removed.

comment

884

comment by: *Union des Aéroports français - UAF*

Attachment [#87](#)

UAF	NPA	2011-20	(B.II)	AMC1-ADR.OR.B.040(a)
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Référence:	AMC1-ADR.OR.B.040(a)
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Changes				
CHANGES	REQUIRING	PRIOR	APPROVAL	

Traduction de courtoisie
(b) It is appropriate to transfer the (b) to GM because they are only examples.

The points (4) and (7) of the (b) are not precise enough and there is a risk of administrative red tapes too important for the aerodrome operator.

response

Accepted

Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, paragraph (b) is turned into Guidance

	Material, while the change to fuel provision is removed.	
comment	1019	comment by: <i>Finavia</i>
	(b)(5) change in the level of the rescue and fire-fighting services; to be removed. Rapid changes in the level of the rescue and fire-fighting services take place in many regional airports in Finland, because airlines keep changing the size of the aeroplanes constantly.	
response	Accepted The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements.	
comment	1030	comment by: <i>Swedish Regional Airport Association</i>
	Add "permanent" before changes	
response	Partially accepted All changes requiring prior approval should undergo the relevant process. Moreover, the text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements. In addition, based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is also amended in all other cases needed.	
comment	1059	comment by: <i>NATS National Air Traffic Services Limited</i>
	This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.	
response	Noted	
comment	1060	comment by: <i>NATS National Air Traffic Services Limited</i>
	AMC1 to ADR.OR.B.040(a) (a)(2) - At the proposed reference there is no paragraph 3(b).	
response	Accepted The Agency has amended the relevant reference.	
comment	1061	comment by: <i>NATS National Air Traffic Services Limited</i>
	AMC1 to ADR.OR.B.040(a) (a)(4) - ADR.OR.B.065 relates to "Termination of operation" and not safety assessment. Whilst ADR.OR.B.045 does not specifically mention safety assessment it does relate to assessment of changes.	
response	Accepted	

The Agency has amended the relevant reference.

comment 1062 comment by: *NATS National Air Traffic Services Limited*

AMC1-ADR.OR.B.040(a) (b) - As these are examples (and there are no "should") then they should be GM and not AMC.

response Accepted
Paragraph (b) will be reviewed and turned into a Guidance Material.

comment 1193 comment by: *Federal Office of Civil Aviation FOCA*

AMC1-ADR.OR.B.040(a), (b)(5): This must be only for permanent changes on the level of the rescue and fire-fighting services. The aerodrome must be allowed to lower the level in accordance with the actual traffic at the aerodrome. If one has only Cat 4 aircraft for a period, the level provided need not exceed Cat 4, but has to be published by NOTAM. Please add the word "permanent".

AMC1-ADR.OR.B.040(a), (b)(7): Changes related to fuel provision should not require prior approval. We suggest deleting this item.

response Accepted
The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements. Based on the amendments to be made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, while the change to fuel provision is removed.

comment 1245 comment by: *UK CAA*

Page No: 61

Paragraph No: AMC1-ADR.OR.B.040(a) item (b)

Comment: The list of examples of changes that require prior approval should be amended to capture the movements areas, changes within the notified boundary and construction of new buildings.

Justification: The current list does not include areas of the aerodrome where changes could have a direct impact or disrupt operations.

Proposed Text: ADD new sub-paragraphs:

(8) changes to the physical characteristics within the notified aerodrome boundary

(9) construction of new buildings

(10) changes to the movements areas (see definition CS-ADR-DSN.A.002-Definitions)

response Accepted

Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed and turned into a Guidance Material which will include the suggested cases.

comment	<p>1359 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #88</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.B.040(a)</p> <p>Référence: AMC1-ADR.OR.B.040(a) Changes CHANGES REQUIRING PRIOR APPROVAL</p> <p>Traduction de courtoisie (b) It is appropriate to transfer the (b) to GM because they are only examples. The points (4) and (7) of the (b) are not precise enough and there is a risk of administrative red tapes too important for the aerodrome operator.</p>
response	<p>Accepted</p> <p>Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, paragraph (b) is turned into Guidance Material, while the change to fuel provision is removed.</p>
comment	<p>1399 comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i></p> <p>(b)(5) change to: permanent change in the level of the rescue and fire-fighting services</p>
response	<p>Accepted</p> <p>The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements.</p>
comment	<p>1430 comment by: <i>Swedish Transport Agency</i></p> <p>The requirement for prior approval in AMC1-ADR.OR.B.040(a), (b)(5) on page 61 must be only for permanent changes in the level of the rescue and fire-fighting services. The aerodrome must be allowed to lower the level in accordance with the actual traffic at the aerodrome. (E.g. if you only have Cat 4 aircraft for a period, the level provided need not exceed Cat 4, but has to be published by NOTAM.)</p>
response	<p>Accepted</p> <p>The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements.</p>

comment	<p>1431 comment by: <i>Swedish Transport Agency</i></p> <p>AMC1-ADR.OR.B.040(a), (b)(7) on page 61: Changes related to fuel provision should not be a change requiring prior approval. We suggest to delete this item.</p>
response	<p>Accepted</p> <p>The text of the AMC reflects the text of the relevant Implementing Rules' requirements on the terms of approval of the certificate. Based on the amendments made to the content of terms of approval to the certificate, the text of the AMC is also amended, in the suggested direction.</p>
comment	<p>1510 comment by: <i>ECA - European Cockpit Association</i></p> <p>Comment on (a)(4): The mentioned safety assessment should involve local pilots' associations</p> <p>Justification: This provides an undiluted operational view on the proposed changes.</p>
response	<p>Noted</p> <p>The aerodrome operator is responsible for the preparation of the relevant safety assessments whose extent and nature affect the type of expertise required, while requirement ADR.OR.B.045 addresses the issue of other affected parties.</p>
comment	<p>1563 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>(b) It is appropriate to transfer the (b) to GM because they are only examples.</p> <p>The points (4) and (7) of the (b) are not precise enough and there is a risk of administrative red tapes too important for the aerodrome operator.</p>
response	<p>Accepted</p> <p>Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, paragraph (b) is turned into Guidance Material, while the change to fuel provision is removed.</p>
comment	<p>1767 comment by: <i>CAA CZ</i></p> <p>Comment by Karlovy Vary airport We proposed modified wording of following paragraph : AMC1-ADR.OR.B.040(a) – Changes (b) Examples of such changes include, but are not limited to, the following: (6) Significant changes in the organisational structure of the organisation, including responsibilities, and accountabilities which could have an impact on safe operation of the aerodrome;</p>
response	<p>Noted</p>

The relevant AMC should be aligned with the content of the relevant requirement.

comment 1828 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#89](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.OR.B.040(a)

Référence: AMC1-ADR.OR.B.040(a)

Changes

CHANGES REQUIRING PRIOR APPROVAL

Traduction de courtoisie
(b) It is appropriate to transfer the (b) to GM because they are only examples.

The points (4) and (7) of the (b) are not precise enough and there is a risk of administrative red tapes too important for the aerodrome operator.

response Accepted

Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, paragraph (b) is turned into Guidance Material, while the change to fuel provision is removed.

comment 1930 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#90](#)

ADBM - NPA 2011-20 (B.II) AMC1- ADR.OR.B.040(a)

Référence: AMC1-ADR.OR.B.040(a)

Changes

CHANGES REQUIRING PRIOR APPROVAL

Traduction de courtoisie
(b) It is appropriate to transfer the (b) to GM because they are only examples.

The points (4) and (7) of the (b) are not precise enough and there is a risk of administrative red tapes too important for the aerodrome operator.

response Accepted

Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, paragraph (b) is turned into Guidance Material, while the change to fuel provision is removed.

comment 1931 comment by: *Pau Pyrénées Airport - PUF/LFBP*

(b) It is appropriate to transfer the (b) to GM because they are only examples.

The points (4) and (7) of the (b) are not precise enough and there is a risk

response	<p>of administrative red tapes too important for the aerodrome operator.</p> <p>Accepted</p> <p>Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, paragraph (b) is turned into Guidance Material, while the change to fuel provision is removed.</p>
comment	<p>2133 <i>comment by: Danish Transport Authority</i></p> <p>Editorial: The reference made in AMC1-ADR.OR.B.040(a), (a)(4) on page 61 should be ADR.OR.B.045.</p> <p>EDITORIAL: To avoid any confusion on the item intentions, the wording could be: " change in the level of protection provided by the aerodrome rescue and fire-fighting services;"</p>
response	<p>Accepted</p> <p>The text is amended in the suggested direction.</p>
comment	<p>2240 <i>comment by: Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Delete this item. Changes related to fuel provision should not require prior approval.</p>
response	<p>Accepted</p> <p>The text of the AMC reflects the text of the relevant Implementing Rules' requirements on the terms of approval of the certificate. Based on the amendments made to the content of terms of approval to the certificate, the text of the AMC is also amended, in the suggested direction.</p>
comment	<p>2244 <i>comment by: Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>amend to read "permanent changes". The aerodrome must have the flexibility to adjust the level according to the actual traffic situation at the aerodrome.</p>
response	<p>Partially accepted</p> <p>All changes requiring prior approval should undergo the relevant process. Moreover, the text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements. In addition, based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is also amended in all other cases needed.</p>
comment	<p>2248 <i>comment by: Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Delete the details about the application process. This article may conflict with the legal procedures of the States about management of change and approval processes.</p>

response Noted
The relevant requirements and, therefore, the relevant AMC are based on the provisions of the Basic Regulation.

comment 2360 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC1-ADR.OR.B.040(a)	Changes CHANGES REQUIRING PRIOR APPROVAL
Proposition/commentaire	(b) Il convient de transférer le (b) en Guidance Materials.
Justification	(b) Ce ne sont que des exemples donc leur place est en GM. Les points (4) et (7) du (b) ne sont pas assez précis et risquent d'engendrer une lourdeur administrative trop importante pour l'exploitant d'aérodrome.
Traduction de courtoisie	(b) It is appropriate to transfer the (b) to GM because they are only examples. The points (4) and (7) of the (b) are not precise enough and there is a risk of administrative red tapes too important for the aerodrome operator.

response Accepted
Based on the amendments made to the content of terms of approval to the certificate, as well as the relevant operator requirement on changes, the text of the AMC is reviewed, paragraph (b) is turned into Guidance Material, while the change to fuel provision is removed.

comment 2447 comment by: *Isavia*

The requirement for prior approval in AMC1-ADR.OR.B.040(a), (b)(5) on page 61 must be only for permanent changes in the level of the rescue and fire-fighting services. The aerodrome must be allowed to lower the level in accordance with the actual traffic at the aerodrome. (E.g. if you only have Cat 4 aircraft for a period, the level provided need not exceed Cat 4, but has to be published by NOTAM.)

response Accepted
The text of the AMC is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements.

**– CERTIFICATION (ADR.OR.B) – AMC1-ADR.OR.B.040(c) – Changes
– CHANGES NOT REQUIRING PRIOR APPROVAL**

comment	554	comment by: <i>Vienna International Airport</i>
	(b)(5) change to: permanent change in the level of the rescue and fire-fighting services	
response	Accepted	
	The Agency understands that this comment refers to AMC1-ADR.OR.B.040(a), whose text is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements. The Agency has deleted AMC1-ADR.OR.B.040(c).	
comment	1063	comment by: <i>NATS National Air Traffic Services Limited</i>
	There is no "should" in this AMC. Suggest making text GM.	
response	Noted	
	The Agency has deleted this AMC.	
comment	1169	comment by: <i>Salzburger Flughafen GmbH</i>
	(b)(5) change to: permanent change in the level of the rescue and fire-fighting services	
response	Accepted	
	The Agency understands that this comment refers to AMC1-ADR.OR.B.040(a), whose text is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements. The Agency has deleted AMC1-ADR.OR.B.040(c).	
comment	1464	comment by: <i>Flughafen Graz Betriebs GmbH</i>
	(b)(5) change to: permanent change in the level of the rescue and fire-fighting services	
response	Accepted	
	The Agency understands that this comment refers to AMC1-ADR.OR.B.040(a), whose text is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements. The Agency has deleted AMC1-ADR.OR.B.040(c).	
comment	1615	comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i>
	(b)(5) change to: permanent change in the level of the rescue and fire-fighting services	

response	Accepted The Agency understands that this comment refers to AMC1-ADR.OR.B.040(a), whose text is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements. The Agency has deleted AMC1-ADR.OR.B.040(c).
comment	2185 comment by: <i>Flughafen Klagenfurt</i> (b)(5) change to: permanent change in the level of the rescue and fire-fighting services
response	Accepted The Agency understands that this comment refers to AMC1-ADR.OR.B.040(a), whose text is amended to make clear that the AMC does not cover temporary changes to the level of protection provided at the aerodrome, in accordance with the relevant ADR.OPS requirements. The Agency has deleted AMC1-ADR.OR.B.040(c).

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B
– CERTIFICATION (ADR.OR.B) – GM1-ADR.OR.B.040 – Changes –
MAINTENANCE ACTIVITIES**

p. 62

comment	13 comment by: <i>ACI EUROPE - Airports Council International</i> Change to the following wording "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect certain on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority" Justification: clarity
response	Noted The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.
comment	184 comment by: <i>SWISS AERODROMES ASSOCIATION</i> Such an provision is unnecessary. This is an example of a provision which should be deleted.

response Accepted

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment 292 comment by: *CAA Austria - Ministry of Transport*

Maintenance activities are generally not considered as changes since they are subject to standardised operating procedures

response Accepted

The Agency agrees that maintenance activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.

comment 339 comment by: *Avinor*

GM1.ADR.OR.B.040. Change to the following wording: "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures, do not require a specific safety assessment. In the case when such activities may have an effect on elements of the certification basis would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority".

response Noted

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment 428 comment by: *Estonian CAA*

GM1-ADR.OR.B.040 on page 62: Routine maintenance should not be regarded as changes. We suggest to delete this GM.

response Accepted

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially

to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment 541 comment by: *Flughafen Düsseldorf GmbH*
Diese Formulierung ist zu weitgehend. Routine Tätigkeiten sollten in der Regel von einer erneuten Genehmigung ausgeschlossen sein. Zudem ist unklar, wer denn dann überprüft, ob eine Genehmigung erforderlich ist.

response Accepted
The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment 556 comment by: *Vienna International Airport*
Maintenance activities, such as re-painting of markings are generally not considered as changes

response Accepted
The Agency agrees that maintenance activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.

comment 591 comment by: *Exeter International Airport*
GM1-ADR-OR.B.040 : Details should include that prior approval would not be required in the case of like for like replacement.

response Accepted
The Agency agrees that maintenance activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.

comment 798 comment by: *Finnish Transport Safety Agency*
GM1-ADR-OR.B.040 on page 62: Routine maintenance should not be regarded as changes. We suggest to delete this GM.

response Accepted

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment 1170 comment by: *Salzburger Flughafen GmbH*

Maintenance activities, such as re-painting of markings are generally not considered as changes

response Accepted

The Agency agrees that maintenance activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.

comment 1194 comment by: *Federal Office of Civil Aviation FOCA*

GM1-ADR.OR.B.040: Please change wording to "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. do not qualify as changes, if the activity is defined and trained with standardised procedures which are periodically reviewed and have undergone a safety assessment upon the development of the procedures ." Routine maintenance activities are generally not considered as changes as long as they are subject to standardised operating procedures which are documented, trained and periodically reviewed.

response Noted

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment 1247 comment by: *UK CAA*

Page No: 62

Paragraph No: GM1-ADR.OR.B.040

Comment: Consideration should be given to prior approval of substantial maintenance projects such as runway or taxiway refurbishment

Justification: Longer-term projects which may involve many key stakeholders and which may disrupt or have significant impacts on

operations, and so test the aerodrome's safety management system, should obtain prior approval in order for the competent authority to determine the level of regulatory oversight required.

Proposed Text: ADD new paragraph:

"Activities such as longer-term projects which may involve many key stakeholders and which may disrupt or have significant impacts on operations, and so test the aerodrome's safety management system, should obtain prior approval in order for the competent authority to determine the level of regulatory oversight required."

response

Partially accepted

The Agency has amended the relevant Implementing Rule ADR-OPS.C.005, to address the issue of substantial maintenance projects, thus the proposed Guidance Material is not needed.

comment

1432

comment by: *Swedish Transport Agency*

GM1-ADR.OR.B.040 on page 62: Routine maintenance should not be regarded as changes. We suggest to delete this GM.

response

Accepted

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment

1442

comment by: *Cologne/Bonn Airport*

Change to the following wording "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect certain on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority"

response

Noted

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment	<p>1466 comment by: <i>Flughafen Graz Betriebs GmbH</i></p> <p>Maintenance activities, such as re-painting of markings are generally not considered as changes</p>
response	<p>Accepted</p> <p>The Agency agrees that maintenance activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.</p>
comment	<p>1511 comment by: <i>Geneva International Airport (ROMIG)</i></p> <p>Change to the following wording "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect certain on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority"</p> <p>Maintenance activities are generally not considered as changes since they are subject to standardised operating procedures. This was a point agreed upon by the Rule Making Group ADR.001.</p>
response	<p>Partially accepted</p> <p>The Agency agrees that maintenance activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.</p>
comment	<p>1513 comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i></p> <p>Maintenance activities, such as re-painting of markings are generally not considered as changes</p>
response	<p>Accepted</p> <p>The Agency agrees that maintenance activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.</p>
comment	<p>1598 comment by: <i>CAA Norway</i></p>

	<p>GM1-ADR.OR.B.040 on page 62: Routine maintenance should not be regarded as changes. We suggest to delete this GM.</p>
response	<p>Accepted</p> <p>The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.</p>
comment	<p>1606 <i>comment by: Assaeroporti - Associazione Italiana Gestori Aeroporti</i></p> <p>To be clearer, ASSAEROPORTI suggests to change the text as follows:</p> <p>"Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect certain on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority".</p>
response	<p>Noted</p> <p>The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.</p>
comment	<p>1628 <i>comment by: Flughafen Linz-Hörsching - LNZ/LOWL</i></p> <p>Maintainance activities, such as re-painting of markings are generally not considered as changes</p>
response	<p>Accepted</p> <p>The Agency agrees that maintenace activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.</p>
comment	<p>1970 <i>comment by: Turin Airport - TRN/LIMF</i></p> <p>To be clearer, we suggest to change the text as follows:</p> <p>"Routine maintenance activities, such as re-painting of the markings,</p>

changing of light-bulbs etc. **that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect** ~~certain~~ on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority".

response

Noted

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment

1985

comment by: *Munich Airport International*

Change to the following wording "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect certain on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority"

Justification: need to be clearer

response

Noted

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment

2054

comment by: *Lugano Airport*

Change to the following wording "Routine maintenance activities, as repainting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect certain on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to followed depends on whether such a change requires or not a prior approval of the competent authority"

Maintenance activities are generally not considered as changes since they are subject to standardised operating procedures. This was a point agreed upon by the Rule Making Group ADR.001.

response Partially accepted

The Agency agrees that maintenance activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.

comment 2186 comment by: *Flughafen Klagenfurt*

Maintenance activities, such as re-painting of markings are generally not considered as changes

response Accepted

The Agency agrees that maintenance activities which do not affect the certification basis should not be considered as changes. This is also reflected on the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), based on which this Guidance Material is no longer needed and so it has been removed.

comment 2239 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*

Amend to read "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect certain on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority"

response *Noted*

The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.

comment 2448 comment by: *Isavia*

GM1.ADR.OR.B.040. Change to the following wording: "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardized procedures and have undergone a safety assessment upon the development of the procedures,

	<p>do not require a specific safety assessment. In the case when such activities may have an effect on elements of the certification basis would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority".</p>
response	<p>Noted</p> <p>The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.</p>
comment	<p>2530 comment by: <i>ADV -German Airports Association</i></p> <p>GM1.ADR.OR.B.040</p> <p>Change to the following wording "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect certain on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority"</p> <p>Justification: need to be clearer</p>
response	<p>Noted</p> <p>The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.</p>
comment	<p>2541 comment by: <i>MST / STR - Stuttgart Airport</i></p> <p>GM1.ADR.OR.B.040</p> <p>Change to the following wording "Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc. that are defined in standardised procedures and have undergone a safety assessment upon the development of the procedures do not require a specific safety assessment. In the case when such activities may have an effect certain on elements of the certification basis and therefore they would qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority"</p>

	<p>Justification: need to be clearer</p>
response	<p>Noted</p> <p>The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.</p>
comment	<p>2634 comment by: <i>Fraport AG</i></p> <p>GM1-ADR.OR.B.040 — Changes</p> <p>Editorial</p> <p>Routine maintenance activities, such as re-painting of the markings, changing of light-bulbs etc, affect certain elements of the certification basis and therefore qualify as changes, and therefore should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority.</p> <p>Proposed Text</p> <p>Routine maintenance activities, such as repainting of markings, changing of light-bulbs etc, affect elements of the certification basis and therefore qualify as changes, and should be treated as such. The procedure to be followed depends on whether such a change requires or not a prior approval of the competent authority.</p> <p>Fraport AG clarity</p>
response	<p>Noted</p> <p>The intent of this Guidance Material was to provide guidance on the application of the requirement on changes (ADR.OR.B.040), and especially to clarify the relationship between certain maintenance activities and the initiation of the relevant change procedure. However, due to the amendments which have been made to the relevant requirement on changes (ADR.OR.B.040), this Guidance Material is no longer needed and so it has been removed.</p>

<p>NPA 2011-20 (B.II) — AMC/GM to ANNEX II — Part -OR — SUBPART B — CERTIFICATION (ADR.OR.B) — AMC1- ADR.OR.B.045(a) — Assessment of changes — SAFETY ASSESSEMENT FOR A CHANGE</p>	<p>p. 62</p>
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comment	532 comment by: <i>Flughafen Düsseldorf GmbH</i>
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	<p>Wer sollte das Assessment machen? Ist eine Bewertung durch interne Mitarbeiter ausreichend oder muss sich der Flughafen externer Gutachter bedienen, was zu einer Kostenzunahme führt? Es sollte nicht ein neues Betätigungsfeld für Gutachter geschaffen werden. Generell stellt sich die Frage nach der Auslegung der Begrifflichkeit "Safety Assessment" (SMM-internes Dokument statt Rechtfertigung gegenüber der Aufsichtsbehörde! – s.o.).</p>
response	<p>Noted</p> <p>It is the responsibility of the aerodrome operator to ensure that the relevant safety assessment is conducted. The aerodrome operator may conduct such safety assessment on its own, or by using third parties, or any other means it finds to be suitable. The Agency does not share the view that a definition of safety assessment is necessary.</p>
comment	<p>578 comment by: Flughafen Düsseldorf GmbH</p> <p>Es ist zu definieren wer das assesment durchführen sollte. Ist eine Bewertung durch interne Mitarbeiter ausreichend oder muss sich der Flughafen externer Experten bedienen. Hier muss wegen der möglichen Kosten verhindert werden, dass neue Betätigungsfelder für entsprechende Firmen kreierte werden.</p>
response	<p>Noted</p> <p>It is the responsibility of the aerodrome operator to ensure that the relevant safety assessment is conducted. The aerodrome operator may conduct such safety assessment on its own, or by using third parties, or any other mean it finds to be suitable.</p>
comment	<p>760 comment by: Airport Nuremberg - NUE/EDDN</p> <p>It is not clear, who exactly should prepare the safety assessment. Is an evaluation of aerodrome personnel adequate or does the aerodrome have to assign an external consultant on that matter, which would eventually lead to further costs. In general it is questionable how the term "Safety Assessment" should be laid out. According to the ICAO Safety Management Manual, it is rather illustrated as an internal tool for the safety management system than a justification to the competent authority! It must be adapted to not risk the open and inbiased safety culture within a company.</p> <p>The new bill introduces very complex rules – especially in the field of SMS – that exceed the existing requirements of ICAO's Annex 14 or those of the German Law by far. In particular incomprehensible is the use of contents with no reference to other existing documents. The inclusion of detailed guidelines and text passages from ICAO's Doc. 9859, which so far served as a guideline only, loads an increased demand of staff, financial means and time on to airports, which is out of all proportion to the benefit to be expected. Why are ICAO manuals transformed into AMCs in the field of SMS, while only ICAO Standards and Recommendations in other fields? Here, it is imperative to create uniform and equal or fair regulations and transfer the content of the manuals to the Guidance Material. A higher degree of safety is not automatically achieved by means of an enormous</p>

	<p>increase of documentation and disproportionate growth of the number of tasks and analyses.</p>
response	<p><i>Accepted</i></p> <p>It is the responsibility of the aerodrome operator to ensure that the relevant safety assessment is conducted. The aerodrome operator may conduct such safety assessment on its own, or by using third parties, or any other means it finds to be suitable. The Agency does not share the view that a definition of safety assessment is necessary.</p> <p>The relevant requirements are based on the content of Annex 14, while the relevant text, which has been reviewed and turned into Guidance Material, has been based on the widely accepted content of ICAO Doc 9859.</p>
comment	<p>1195 comment by: <i>Federal Office of Civil Aviation FOCA</i></p> <p>The link between safety criteria (which we assume correspond to the safety objectives, as defined in the ATM/ANS domain in EC 1035/2011) and the severity of effects of the hazards should be better clarified (i.e. link between point b and c. In para. f) it might be worth adding "before the change is put into operation".</p>
response	<p>Partially accepted</p> <p>The Agency has the view that this text, which has been reviewed and turned into Guidance Material, in conjunction with the relevant Guidance Material provided under ADR.OR.D.005, constitutes an adequate basis for the preparation and conduct of safety assessments.</p> <p>Paragraph (f) has been amended as suggested.</p>
comment	<p>1525 comment by: <i>Flughafen Graz Betriebs GmbH</i></p> <p>Wer sollte das Assessment machen? Ist eine Bewertung durch interne Mitarbeiter ausreichend oder muss sich der Flughafen externer Gutachter bedienen? Generell stellt sich die Frage nach der Auslegung der Begrifflichkeit Safety Assessment (SMM- internes Dokument statt Rechtfertigung gegenüber der Aufsichtsbehörde! – s.o.)</p>
response	<p>Noted</p> <p>It is the responsibility of the aerodrome operator to ensure that the relevant safety assessment is conducted. The aerodrome operator may conduct such safety assessment on its own, or by using third parties, or any other means it finds to be suitable. The Agency does not share the view that a definition of safety assessment is necessary.</p>
comment	<p>1611 comment by: <i>Assaeroporti - Associazione Italiana Gestori Aeroporti</i></p> <p>ASSAEROPORTI fully understands the importance of safety risk assessments, but for some big airports this could mean to be in need of</p>

	<p>several risk assessments each day, at the expense of administrative workload and efficiency.</p> <p>We suggest to involve the safety personnel of an airport operator at the beginning of each process of change in order to avoid bottlenecks and delays.</p>
response	<p>Noted</p> <p>Neither the relevant requirement or the commented text, which has been turned into Guidance Material, foresee that the safety assessment may not be conducted by the aerodrome operator or its personnel. The relevant requirement foresees only the coordination with the affected organisations.</p> <p>In any case, the relevant responsibility is with the aerodrome operator.</p>
comment	<p>1968 comment by: <i>Turin Airport - TRN/LIMF</i></p> <p>Turin Airport fully understands the importance of safety risk assessments, but for some big airports this could mean to be in need of several risk assessments each day, at the expense of administrative workload and efficiency.</p> <p>We suggest to involve the safety personnel of an airport operator at the beginning of each process of change in order to avoid bottlenecks and delays.</p>
response	<p>Noted</p> <p>Neither the relevant requirement or the commented text, which has been turned into Guidance Material, foresee that the safety assessment may not be conducted by the aerodrome operator or its personnel. The relevant requirement foresees only the coordination with the affected organisations.</p> <p>In any case, the relevant responsibility is with the aerodrome operator.</p>
comment	<p>2520 comment by: <i>ADV -German Airports Association</i></p> <p>AM 1- ADR.OR.B.045(a) – Assessment of changes SAFETY ASSESSEMENT FOR A CHANGE A safety assessment for a change should include:</p> <ul style="list-style-type: none">(a) identification of the scope of the change;(b) identification of hazards;(c) determination of the safety criteria applicable to the change;(d) risk analysis in relation to the harmful effects or improvements in safety related to the change;(e) risk evaluation and, if required, risk mitigation for the change to meet the applicable safety criteria;(f) verification that the change conforms to the scope that was subject to safety assessment and meets the safety criteria; and(g) the specification of the monitoring requirements necessary to ensure that the aerodrome and its operation will continue to meet the safety

	<p>criteria after the change has taken place.</p> <p>Wer sollte das Assessment machen? Ist eine Bewertung durch interne Mitarbeiter ausreichend oder muss sich der Flughafen externer Gutachter bedienen? Generell stellt sich die Frage nach der Auslegung der Begrifflichkeit Safety Assessment (SMM- internes Dokument statt Rechtfertigung gegenüber der Aufsichtsbehörde! – s.o.)</p>
response	<p><i>Noted</i></p> <p>It is the responsibility of the aerodrome operator to ensure that the relevant safety assessment is conducted. The aerodrome operator may conduct such safety assessment on its own, or by using third parties, or any other means it finds to be suitable. The Agency does not share the view that a definition of safety assessment is necessary.</p>
comment	<p>2551 comment by: <i>MST / STR - Stuttgart Airport</i></p> <p>AM 1- ADR.OR.B.045(a) – Assessment of changes SAFETY ASSESSEMENT FOR A CHANGE A safety assessment for a change should include:</p> <ul style="list-style-type: none">(a) identification of the scope of the change;(b) identification of hazards;(c) determination of the safety criteria applicable to the change;(d) risk analysis in relation to the harmful effects or improvements in safety related to the change;(e) risk evaluation and, if required, risk mitigation for the change to meet the applicable safety criteria;(f) verification that the change conforms to the scope that was subject to safety assessment and meets the safety criteria; and(g) the specification of the monitoring requirements necessary to ensure that the aerodrome and its operation will continue to meet the safety criteria after the change has taken place. <p>Wer sollte das Assessment machen? Ist eine Bewertung durch interne Mitarbeiter ausreichend oder muss sich der Flughafen externer Gutachter bedienen? Generell stellt sich die Frage nach der Auslegung der Begrifflichkeit Safety Assessment (SMM- internes Dokument statt Rechtfertigung gegenüber der Aufsichtsbehörde! – s.o.)</p>
response	<p><i>Noted</i></p> <p>It is the responsibility of the aerodrome operator to ensure that the relevant safety assessment is conducted. The aerodrome operator may conduct such safety assessment on its own, or by using third parties, or any other means it finds to be suitable. The Agency does not share the view that a definition of safety assessment is necessary.</p>
comment	<p>2618 comment by: <i>ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen</i></p> <p>AM 1- ADR.OR.B.045(a) – Assessment of changes SAFETY ASSESSEMENT FOR A CHANGE</p>

Wer sollte das Assessment machen? Ist eine Bewertung durch interne Mitarbeiter ausreichend oder muss sich der Flughafen externer Gutachter bedienen? Generell stellt sich die Frage nach der Auslegung der Begrifflichkeit Safety Assessment (SMM- internes Dokument statt Rechtfertigung gegenüber der Aufsichtsbehörde! – s.o.)

response

Noted

It is the responsibility of the aerodrome operator to ensure that the relevant safety assessment is conducted. The aerodrome operator may conduct such safety assessment on its own, or by using third parties, or any other means it finds to be suitable. The Agency does not share the view that a definition of safety assessment is necessary.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B
– CERTIFICATION (ADR.OR.B) – AMC1- ADR.OR.B.045(b) –
Assessment of changes – SCOPE OF THE SAFETY ASSESSMENT**

p. 62

comment

769

comment by: *Airport Nuremberg - NUE/EDDN*

The Scope of the Safety Assessment is worded very vaguely and unfortunately leaves a lot of room for interpretation. Any change in the company could be filed in the categories (a) to (c). A direct relation to safety should be given.

Airports need more resources and longer time to implement the demanded rules and deal with the additionally required administrative work in detail (detailed preparation, review, documentation, communication, archiving, etc.). Meeting the desired degree of accuracy when implementing the rules is definitively impossible with the current staff.

response

Noted

The Agency has the view that current material, which has been reviewed and turned into Guidance Material, is adequate considering the existence of other relevant material provided under ADR.OR.D.005. The scope of the relevant requirement should be approached through the prism of the Agency's competences which are safety related.

comment

1196

comment by: *Federal Office of Civil Aviation FOCA*

For completeness and comparison purposes it has to be kept in mind that EC 1035/2011, Annex II, Sect. 3.2.1 defines the life-cycle of the part under consideration as the period from the initial planning until the decommissioning. This period extends over the introduction of the change, which is addressed in ADR.OR.B.045.

response

Noted

The Agency has reviewed the relevant material. The issue mentioned is covered by the content of paragraph (7) of GM1-ADR.OR.B.045 (former AMC1-ADR.OR.B.045), while the relevant Implementing Rule has been simplified and merged with ADR.OR.B.040.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B
– CERTIFICATION (ADR.OR.B) – AMC1- ADR.OR.B.045(d) –
Assessment of changes – SAFETY CRITERIA**

p. 63

comment	104	comment by: <i>CAA Norway</i>
	We suggest to change AMC1-ADR.OR.B.045(d) on page 63 to GM as this is only a description of one of many possibilities for safety criteria.	
response	Accepted The Agency has reviewed the text which has now been turned into Guidance Material.	
comment	160	comment by: <i>Swedavia AB - Swedish airports (currently 11 airports)</i>
	Move to a GM as this is only a description of one of many possibilities for safety criteria.	
response	Accepted The Agency has reviewed the text which has now been turned into Guidance Material.	
comment	429	comment by: <i>Estonian CAA</i>
	We suggest to change AMC1- ADR.OR.B.045(d) on page 63 to GM as this is only a description of one of many possibilities for safety criteria.	
response	Accepted The Agency has reviewed the text which has now been turned into Guidance Material.	
comment	469	comment by: <i>Icelandic Civil Aviation Administration</i>
	We suggest to change AMC1- ADR.OR.B.045(d) on page 63 to GM as this is only a description of one of many possibilities for safety criteria.	
response	Accepted The Agency has reviewed the text which has now been turned into Guidance Material.	
comment	579	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Dies ist sehr ungenau definiert und kann daher höchstens GM sein. Es gibt hierzu bisher keine Vorgaben!	
response	Accepted The Agency has reviewed the text which has now been turned into	

Guidance Material.

comment 799 comment by: *Finnish Transport Safety Agency*

We suggest to change AMC1- ADR.OR.B.045(d) on page 63 to GM as this is only a description of one of many possibilities for safety criteria.

response Accepted

The Agency has reviewed the text which has now been turned into Guidance Material.

comment 1433 comment by: *Swedish Transport Agency*

We suggest to change AMC1-ADR.OR.B.045(d) on page 63 to GM as this is only a description of one of many possibilities for safety criteria.

response Accepted

The Agency has reviewed the text which has now been turned into Guidance Material.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B – CERTIFICATION (ADR.OR.B) – AMC1-ADR.OR.B.055 – Change of aerodrome operator – REQUIRED DOCUMENTATION	p. 63
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comment 751 comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR.OR.B.055	Change of aerodrome operator REQUIRED DOCUMENTATION
Proposition/commentaire	Modifier le § conformément au 9ieme commentaire général (B.I) ref n° 2892 et du commentaire n°1135 du NPA 2011-20 (B.I) ADR.OR.B.055 (a)
Justification	
Traduction de courtoisie	Text to be modified along 9th general comment (B.I) ref n° 2892 and comment n°1135 of NPA 2011-20 (B.I) ADR.OR.B.055 (a)

response Noted

The Agency has removed the relevant Implementing Rule and, therefore, the related AMC.

comment 886 comment by: *Union des Aéroports français - UAF*

Attachment [#91](#)

	UAF	NPA	2011-20	(B.II)	AMC1-ADR.OR.B.055
	Référence:				AMC1-ADR.OR.B.055
	Change		of	aerodrome	operator
	REQUIRED				DOCUMENTATION
	Traduction		de		courtoisie
	The EASA considers that everything is settled through arrangements between the current aerodrome operator and the future operator, which is an utopian vision. (cf. commentaire UAF NPA 2011-20 (B.I) ADR.OR.B.055 (a))				
response	Noted				
	The Agency has removed the relevant Implementing Rule and, therefore, the related AMC.				
comment	1064 comment by: <i>NATS National Air Traffic Services Limited</i>				
	AMC1-ADR.OR.B.055 (c) - There is no "should" in this AMC, suggest making the text GM.				
response	Noted				
	The Agency has removed the relevant Implementing Rule and, therefore, the related AMC.				
comment	1362 comment by: <i>Euroairport Bâle-Mulhouse</i>				
	Attachment #92				
	Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.B.055				
	Référence:				AMC1-ADR.OR.B.055
	Change		of	aerodrome	operator
	REQUIRED				DOCUMENTATION
	Traduction		de		courtoisie
	The EASA considers that everything is settled through arrangements between the current aerodrome operator and the future operator, which is an utopian vision. (cf. commentaire UAF NPA 2011-20 (B.I) ADR.OR.B.055 (a))				
response	Noted				
	The Agency has removed the relevant Implementing Rule and, therefore, the related AMC.				
comment	1567 comment by: <i>Aéroport de Marseille - MRS/LFML</i>				
	The EASA considers that everything is settled through arrangements between the current aerodrome operator and the future operator, which is an utopian vision. (cf. commentaire UAF NPA 2011-20 (B.I) ADR.OR.B.055 (a))				
response	Noted				

The Agency has removed the relevant Implementing Rule and, therefore, the related AMC.

comment 1829 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*
Attachment [#93](#)
UAF NPA 2011-20 (B.II) AMC1-ADR.OR.B.055
Référence: AMC1-ADR.OR.B.055
Change of aerodrome operator
REQUIRED DOCUMENTATION
Traduction de courtoisie
The EASA considers that everything is settled through arrangements between the current aerodrome operator and the future operator, which is an utopian vision. (cf. commentaire UAF NPA 2011-20 (B.I) ADR.OR.B.055 (a))

response Noted
The Agency has removed the relevant Implementing Rule and, therefore, the related AMC.

comment 1929 comment by: *Pau Pyrénées Airport - PUF/LFBP*
The EASA considers that everything is settled through arrangements between the current aerodrome operator and the future operator, which is an utopian vision **and impossible**. (cf. commentaire NPA 2011-20 (B.I) ADR.OR.B.055 (a))

response Noted
The Agency has removed the relevant Implementing Rule and, therefore, the related AMC.

comment 1943 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*
Attachment [#94](#)
ADBM - NPA 2011-20 (B.II) AMC1-ADR.OR.B.055
Référence: AMC1-ADR.OR.B.055
Change of aerodrome operator
REQUIRED DOCUMENTATION
Traduction de courtoisie
The EASA considers that everything is settled through arrangements between the current aerodrome operator and the future operator, which is an utopian vision. (cf. commentaire ADBM NPA 2011-20 (B.I) ADR.OR.B.055 (a))

response Noted
The Agency has removed the relevant Implementing Rule and, therefore, the related AMC.

comment 2363 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC1-ADR.OR.B.055	Change of aerodrome operator REQUIRED DOCUMENTATION
Proposition/commentaire	L'AESA estime que tout se règle par le biais d'arrangements entre l'exploitant en place et le futur exploitant, ce qui est une vision utopique. (cf. commentaire NPA 2011-20 (B.I) ADR.OR.B.055 (a))
Justification	
Traduction de courtoisie	The EASA considers that everything is settled through arrangements between the current aerodrome operator and the future operator, which is an utopian vision. (cf. commentaire NPA 2011-20 (B.I) ADR.OR.B.055 (a))

response Noted

The Agency has removed the relevant Implementing Rule and, therefore, the related AMC.

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART B – CERTIFICATION (ADR.OR.B) – AMC1-ADR.OR.B.065 – Termination of operation – TERMINATION OF OPERATION</p>	<p>p. 63</p>
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comment 752 comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR.OR.B.065	Termination of operation
Proposition/commentaire	Il convient de supprimer cet article.
Justification	L'arrêt d'une exploitation par un exploitant d'aérodrome ne signifie pas forcément la fermeture de la plateforme. En effet il existe des règles qui permettent à l'autorité d'exploiter directement en régie la plateforme.
Traduction de courtoisie	It is appropriate to delete this article. The termination of operation by the aerodrome operator does not necessary mean the platform closing. Indeed there are rules that permit the authority to directly operate through direct state control.

response

Not accepted

There are cases where, for various reasons, the aerodrome operator decides to terminate its operations and to surrender its certificate. In accordance with Annex 15, the ceasing of operations of an aerodrome is considered to be a significant change of the air navigation system, which the aviation community needs to be aware of in advance. It is the responsibility of the aerodrome operator to take all necessary measures in this respect, because the aerodrome is still in operation.

In addition, such termination of operations may lead to inadvertent use of the aerodrome with unforeseeable consequences in terms of safety. Therefore, the aerodrome operator needs to take the necessary measures to prevent such events.

comment

856

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX II - Part-OR - ADR.OR.B.065 — Termination of operation (p44)
- AMC/GM to ANNEX II - Part-OR - AMC1-ADR.OR.B.065 — Termination of operation (p63)

2. Justification and proposed text / comment

This comment is linked with comment 1110 in book I.

This comment is **critical**.

The termination of operation is a matter of the aerodrome creator and absolutely not of the aerodrome operator. This IR means the aerodrome operator can "close" the aerodrome; nevertheless, the aerodrome operator, in cases where it is needed, only suspend the operations (for instance if snow conditions are really too bad to operate).

The suspension of operations by the aerodrome operator is managed through the management of changes, within the aerodrome operator SMS and is covered by the IR related to these points.

The termination of operation is managed by the State and/or the aerodrome creator (region for instance), and is defined by administrative legislation within the system of the State. It is not EASA competency to regulate the creation and the closure of an aerodrome, and this point is not dealt with by the competent authority but by the State or the region. This specification impacts the French system.

Consequently, ADR.OR.B.065 is confusing and useless: it is proposed to **delete the entire provision**.

response

Not accepted

There are cases where, for various reasons, the aerodrome operator decides to terminate its operations and to surrender its certificate. In accordance with Annex 15, the ceasing of operations of an aerodrome is considered to be a significant change of the air navigation system, which the aviation community needs to be aware of in advance. It is the responsibility of the aerodrome operator to take all necessary measures in this respect, because the aerodrome is still in operation.

In addition, such termination of operations may lead to inadvertent use of the aerodrome with unforeseeable consequences in terms of safety. Therefore, the aerodrome operator needs to take the necessary measures to prevent such events.

comment 887 comment by: *Union des Aéroports français - UAF*
 Attachment [#95](#)
 UAF NPA 2011-20 (B.II) AMC1-ADR.OR.B.065
 Référence: AMC1-ADR.OR.B.065
 Termination of operation
 Traduction de courtoisie
 It is appropriate to delete this article.
 The termination of operation by the aerodrome operator does not necessary mean the plateform closing. Indeed there are rules that permit the authority to directly operate through direct state control.

response Not accepted
 There are cases where, for various reasons, the aerodrome operator decides to terminate its operations and to surrender is certificate. In accordance with Annex 15, the ceasing of operations of an aerodrome is considered to be a significant change of the air navigation system, which the aviation community needs to be aware of in advance. It is the responsibility of the aerodrome operator to take all necessary measures in this respect, because the aerodrome is still in operation.
 In addition, such termination of operations may lead to inadvertent use of the aerodrome with unforeseeable consequences in terms of safety. Therefore, the aerodrome operator needs to take the necessary measures to prevent such events.

comment 1066 comment by: *NATS National Air Traffic Services Limited*
 This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.

response Noted

comment 1363 comment by: *Euroairport Bâle-Mulhouse*
 Attachment [#96](#)
 Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.B.065
 Référence: AMC1-ADR.OR.B.065
 Termination of operation

	<p>Traduction de courtoisie It is appropriate to delete this article. The termination of operation by the aerodrome operator does not necessary mean the plateform closing. Indeed there are rules that permit the authority to directly operate through direct state control.</p>
response	<p>Not accepted</p> <p>There are cases where, for various reasons, the aerodrome operator decides to terminate its operations and to surrender is certificate. In accordance with Annex 15, the ceasing of operations of an aerodrome is considered to be a significant change of the air navigation system, which the aviation community needs to be aware of in advance. It is the responsibility of the aerodrome operator to take all necessary measures in this respect, because the aerodrome is still in operation.</p> <p>In addition, such termination of operations may lead to inadvertent use of the aerodrome with unforeseeable consequences in terms of safety. Therefore, the aerodrome operator needs to take the necessary measures to prevent such events.</p> <p>.</p>
comment	<p>1568 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>It is appropriate to delete this article. The termination of operation by the aerodrome operator does not necessary mean the plateform closing. Indeed there are rules that permit the authority to directly operate through direct state control.</p>
response	<p><i>Not accepted</i></p> <p>There are cases where, for various reasons, the aerodrome operator decides to terminate its operations and to surrender is certificate. In accordance with Annex 15, the ceasing of operations of an aerodrome is considered to be a significant change of the air navigation system, which the aviation community needs to be aware of in advance. It is the responsibility of the aerodrome operator to take all necessary measures in this respect, because the aerodrome is still in operation.</p> <p>In addition, such termination of operations may lead to inadvertent use of the aerodrome with unforeseeable consequences in terms of safety. Therefore, the aerodrome operator needs to take the necessary measures to prevent such events.</p>
comment	<p>1830 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #97</p> <p>UAF NPA 2011-20 (B.II) AMC1-ADR.OR.B.065</p> <p>Référence: AMC1-ADR.OR.B.065</p>

Termination of operation
Traduction de courtoisie
It is appropriate to delete this article.
The termination of operation by the aerodrome operator does not necessary mean the plateform closing. Indeed there are rules that permit the authority to directly operate through direct state control.

response

Not accepted

There are cases where, for various reasons, the aerodrome operator decides to terminate its operations and to surrender is certificate. In accordance with Annex 15, the ceasing of operations of an aerodrome is considered to be a significant change of the air navigation system, which the aviation community needs to be aware of in advance. It is the responsibility of the aerodrome operator to take all necessary measures in this respect, because the aerodrome is still in operation.

In addition, such termination of operations may lead to inadvertent use of the aerodrome with unforeseeable consequences in terms of safety. Therefore, the aerodrome operator needs to take the necessary measures to prevent such events.

comment

1925

comment by: *Pau Pyrénées Airport - PUF/LFBP*

It is appropriate to delete this article.
The termination of operation by the aerodrome operator does not necessary mean the plateform closing. Indeed there are rules that permit the authority to directly operate through direct state control.

response

Not accepted

There are cases where, for various reasons, the aerodrome operator decides to terminate its operations and to surrender is certificate. In accordance with Annex 15, the ceasing of operations of an aerodrome is considered to be a significant change of the air navigation system, which the aviation community needs to be aware of in advance. It is the responsibility of the aerodrome operator to take all necessary measures in this respect, because the aerodrome is still in operation.

In addition, such termination of operations may lead to inadvertent use of the aerodrome with unforeseeable consequences in terms of safety. Therefore, the aerodrome operator needs to take the necessary measures to prevent such events.

comment

2368

comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC1-ADR.OR.B.065	Termination of operation
Proposition/commentaire	Il convient de supprimer cet article.

Justification	L'arrêt d'une exploitation par un exploitant d'aérodrome ne signifie pas forcément la fermeture de la plateforme. En effet il existe des règles qui permettent à l'autorité d'exploiter directement en régie la plateforme.
Traduction de courtoisie	It is appropriate to delete this article. The termination of operation by the aerodrome operator does not necessary mean the platform closing. Indeed there are rules that permit the authority to directly operate through direct state control.

response

Not accepted

There are cases where, for various reasons, the aerodrome operator decides to terminate its operations and to surrender its certificate. In accordance with Annex 15, the ceasing of operations of an aerodrome is considered to be a significant change of the air navigation system, which the aviation community needs to be aware of in advance. It is the responsibility of the aerodrome operator to take all necessary measures in this respect, because the aerodrome is still in operation.

In addition, such termination of operations may lead to inadvertent use of the aerodrome with unforeseeable consequences in terms of safety. Therefore, the aerodrome operator needs to take the necessary measures to prevent such events.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART C
– ADDITIONAL OPERATOR RESPONSIBILITIES (ADR.OR.C) – AMC1-
ADR.OR.C.005(e) – Operator Responsibilities – PUBLICATION OF
INFORMATION TO THE AERONAUTICAL INFORMATION PUBLICATION**

p. 64

comment

105

comment by: CAA Norway

Editorial: AMC1- ADR.OR.C.005 (e) This AMC reference to (e) is incorrect, should be referring to (c) and thus renamed AMC1- ADR.OR.C.005(c).

response

Accepted

The Agency will amend the title of the AMC.

comment

132

comment by: CAA-NL

In the heading (e) should be (c).

response

Accepted

The Agency will amend the title of the AMC.

comment	161	comment by: <i>Swedavia AB - Swedish airports (currently 11 airports)</i>
	Changes in the AIP requires coordination with the CAA and will create extra administrative workload for both parties.	
response	Noted	
	The Agency believes that publication of such information is necessary to ensure the safety of aircraft.	
comment	430	comment by: <i>Estonian CAA</i>
	"Editorial: AMC1- ADR.OR.C.005 (e) This AMC reference to (e) is incorrect, should be referring to (c) and thus renamed AMC1- ADR.OR.C.005(c)."	
response	Accepted	
	The Agency will amend the title of the AMC.	
comment	470	comment by: <i>Icelandic Civil Aviation Administration</i>
	Editorial: AMC1- ADR.OR.C.005 (e) This AMC reference to (e) is incorrect, should be referring to (c) and thus renamed AMC1- ADR.OR.C.005(c).	
response	Accepted	
	The Agency will amend the title of the AMC.	
comment	800	comment by: <i>Finnish Transport Safety Agency</i>
	Editorial: AMC1- ADR.OR.C.005 (e) This AMC reference to (e) is incorrect, should be referring to (c) and thus renamed AMC1- ADR.OR.C.005(c).	
response	Accepted	
	The Agency will amend the title of the AMC.	
comment	1067	comment by: <i>NATS National Air Traffic Services Limited</i>
	AMC1-ADR.OR.C.005(e)	
	There is no ADR.OR.C.005(e) for this AMC to relate to.	
response	Accepted	
	The Agency will amend the title of the AMC to refer to the correct paragraph of the relevant requirement.	
comment	1248	comment by: <i>UK CAA</i>
	Page No: 64	

Paragraph No: AMC1.ADR.OR.C.005(e)

Comment: The publication of all these pieces of information is not necessary and conflicts with the relevant IR.

Justification: The IR requires that information be published, where relevant, whereas the AMC does not include this. As an example, where an infringement of an OLS has been agreed as an equivalent level of safety, it needs only to be listed in the AIP as an obstacle – details of the ELOS are NOT required to be published.

Proposed Text: AMC1. ADR.OR.C.005(e): “..... should be published in the aeronautical information publication **where relevant.....**”.

response

Noted

The relevant Implementing Rule requires the publication of all relevant information and in addition, the publication of relevant information under (c) (1);(2);(3) as appropriate.

comment

1291

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX II - Part-OR - AMC-ADR.OR.C.005(e) - Operator Responsibilities (p64)

2. Justification and proposed text / comment

The AIP should only contain information useful for aircraft operators using the aerodrome, i.e. limitations and special measures that would apply to them.

Moreover, it is noted that paragraph (e) of ADR.OR.C.005 doesn't exist, so it is supposed the good reference for this AMC is paragraph (c) of ADR.OR.C.005 which deals with the publication of aeronautical information.

AMC1-ADR.OR.C.005(e) (c) - Operator Responsibilities

"PUBLICATION OF INFORMATION TO THE AERONAUTICAL INFORMATION PUBLICATION

A description of cases involving exemptions, derogations, cases of equivalent level of safety, special conditions, including operational measures and limitations with regard to the use of the aerodrome, should be published in the aeronautical information publication, after coordination with the competent authority."

response

Noted

The Agency believes that publication of such information is necessary to ensure the safety of aircraft.

comment

1434

comment by: *Swedish Transport Agency*

Editorial: AMC1- ADR.OR.C.005 (e) This AMC reference to (e) is incorrect, should be referring to (c) and thus renamed AMC1- ADR.OR.C.005(c).

response Accepted
The Agency will amend the title of the AMC.

comment 1704 comment by: ENAC Ente Nazionale per l'Aviazione Civile
missing the related implementation rule ADR.OR.C.005

response Accepted
The Agency will amend the title of the AMC to refer to the correct paragraph (paragraph (c)) of the relevant requirement.

comment 2060 comment by: AENA - Aeropuertos Españoles y Navegación Aérea

The AIP should only contain information useful for aircraft operators using the aerodrome, i.e. limitations and special measures that would apply to them.
Moreover, it is noted that paragraph (e) of ADR.OR.C.005 doesn't exist, so it is supposed the good reference for this AMC is paragraph (c) of ADR.OR.C.005 which deals with the publication of aeronautical information.

AMC1-ADR.OR.C.005(e) (c) - Operator Responsibilities

"PUBLICATION OF INFORMATION TO THE AERONAUTICAL INFORMATION PUBLICATION

A description of cases involving exemptions, derogations, cases of equivalent level of safety, special conditions, including operational measures and limitations with regard to the use of the aerodrome, should be published in the aeronautical information publication, after coordination with the competent authority."

response Partially accepted
The Agency will amend the title of the AMC to refer to the correct paragraph (paragraph (c)) of the relevant requirement. However, the Agency believes that the publication of such information is necessary to ensure the safety of aircraft.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART C
– ADDITIONAL OPERATOR RESPONSIBILITIES (ADR.OR.C) – GM1-
ADR.OR.C.010 – Use of the aerodrome by large aircraft – ELEMENTS
TO BE ASSESSED**

p. 64

comment 864 comment by: DGAC Direction Générale de l'aviation civile
1. Affected paragraphs

- ANNEX II – Part-OR – ADR.OR.C.010 - Use of the aerodrome by large aircraft (p46)
- AMC/GM to ANNEX II – Part-OR – GM1-ADR.OR.C.010 – Use of

the aerodrome by large aircraft (p64)

2. Justification and proposed text / comment

This comment is linked with comment 1116 in book I.
Depending on the type of aircraft, the competent authority does not always have to give prior approval when a more demanding aircraft may use the aerodrome. However, it should be systematically notified to the competent authority, Then, when the change requires prior approval as defined by the competent authority in accordance with ADR.OR.B.040, the aerodrome operator should be informed about the decision to follow the change or not.

Moreover, the aerodrome reference code is a planning design tool only and is not pertinent for daily operations. Referring to "an aeroplane with a higher code letter" may be confusing because there can be several "reference codes" depending on the infrastructure (example: a taxiway used for some types of aeroplanes only). It is thus not appropriate in these provisions and should be replaced by "more demanding aircraft".

ADR.OR.C.010 - Use of the aerodrome by large aircraft

"(a) Subject to prior notification to ~~approval by the~~ competent authority, an aerodrome operator may permit the use of the aerodrome or parts thereof by a more demanding aircraft with a higher code letter than the aerodrome design characteristics specified in the terms of approval of certificate.

(b) In showing compliance with this article, the provisions of ADR.OR.B.040 shall apply for changes requiring prior approval as determined by the competent authority."

GM1-ADR.OR.C.010 – Use of the aerodrome by large aircraft

"ELEMENTS TO BE ASSESSED

When assessing the possibility of operation of a more demanding aircraft whose code letter is higher than the code letter of the aerodrome reference code, the aerodrome operator should, amongst other issues, assess the impact of the characteristics of the aircraft on the aerodrome, its facilities, equipment and its operation, and vice versa.
[...]"

response

Noted

The intent of the relevant requirement, and therefore, of the relevant Guidance Material, is to address the cases of operation of aircraft with a higher code letter at aerodromes or parts thereof.

comment

1020

comment by: Finavia

Aerodrome operator can't do this by itself. The assessment must be done together with the a/c operator.

response

Noted

The requirement of the relevant Implementing Rule is related to ADR.OR.B.045 which foresees such assessments, involving all interested parties.

comment

1185

comment by: Brussels Airport - BRU/EBBR

	<p>See my remark on ADR.OR.C.010(b) : To add : except in an emergency. "Subject to prior approval by the competent authority, an aerodrome operator may permit the use of the aerodrome or parts thereof by aircraft with a higher code letter than the aerodrome design characteristics specified in the terms of approval of certificate, except in an emergency." Of course the actual acceptance of an aircraft with a higher code letter than the aerodrome design characteristics in case of emergency, should be based on a safety case/study, made in advance. Therefore, I would also add a GM, e.g. GM2-ADR.OR.C.010 describing this.</p>
response	<p>Noted</p> <p>The Agency will amend the proposed Implementing Rule instead.</p>
comment	<p>1512 comment by: ECA - European Cockpit Association</p> <p>Comment: This assessment should be done involving the local pilots' association</p> <p>Justification: As listed under subpoint (g) the cockpit view as an aircraft characteristic is to be included into the assessment. It is quite obvious that one needs a pilot for this task.</p>
response	<p>Noted</p> <p>The requirement of the relevant Implementing Rule is related to ADR.OR.B.045 which foresees such assessments, involving all interested parties.</p>
comment	<p>1969 comment by: DGAC Direction Générale de l'aviation civile</p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• NPA 2011-20 (B II)-GM1-ADR.OR.C.010 – Use of the aerodrome by large aircraft (p64) <p><u>2. Justification and proposed text / comment</u></p> <p>This comment is linked to comment n°855 in Book 1</p> <p>The word "large aircraft" is not appropriate (even ICAO Circular 305 states that a "NLA" is a "new larger aircraft", but "larger" is a generic word and can mean "longer", "more stringent"). Consequently, the word "large" is not really adequate for the subject and for a regulation: it is proposed to use "more demanding aircraft" as used in other IRs of the NPA and in the Explanatory Note, in paragraph 47 (page 12).</p> <p>Linked with the point above, the reference to code letter is not relevant because does not cover all the cases : the code letter only refers to the wing span and the outer main gear wheel span, but the aircraft can be more demanding because of its length (example for the location of holding positions). The terms of approval of the certificate do not mention the "aerodrome design characteristics" but the "more demanding aircrafts".</p> <p>Moreover, the use by more demanding aeroplanes is managed through the management of changes, for which the competent authority only approves</p>

the significant changes. We can imagine the aerodrome already has some taxiways adequately dimensioned to have a dedicated path for the new aircraft, and in this case, the assessment should NOT be subject to prior approval by the competent authority. As this is already dealt with by the IRs on the management of changes, we propose to delete the reference to the prior approval.

Consequently, it is proposed to modify GM1-ADR.OR.C.010 as follows :

- **GM1 -ADR.OR. C.010 – Use of the aerodrome by large aircraft a more demanding aircraft**

ELEMENTS TO BE ASSESSED

When assessing the possibility of operation of a more demanding aircraft whose code letter is higher than the one used to determine code letter of the aerodrome reference code, the aerodrome operator should, amongst other issues, assess the impact of the characteristics of the aircraft on the aerodrome, its facilities, equipment and its operation, and vice versa.

response

Noted

The intent of the relevant requirement, and, therefore, of the relevant Guidance Material, is to address the cases of operation of aircraft with a higher code letter at aerodromes or parts thereof.

comment

2053

comment by: *Lugano Airport*

add "where the code letter is F" to make the sentence "where the code letter is F, the aerodrome operator should..."

refer to ICAO Circulars 305-AN/177 and 301-AN/174 are intended mainly to NLAs.

response

Noted

The intent of the relevant requirement, and, therefore, of the relevant Guidance Material, is to address the cases of operation of aircraft with a higher code letter at aerodromes or parts thereof, and not specifically code F aircrafts. The items listed in the Guidance Material apply for all cases where an aircraft has a higher code letter.

comment

2230

comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*

change "where the code letter is F" to "where the code letter is F, the aerodrome operator should..."

response

Noted

The intent of the relevant requirement, and therefore of the relevant Guidance Material, is to address the cases of operation of aircraft with a higher code letter at aerodromes or parts thereof, and not specifically code F aircrafts. The items listed in the Guidance Material apply for all cases where an aircraft has a higher code letter.

comment

2445

comment by: *AIRBUS*

GM1-ADR.OR.C.010 – Use of the aerodrome by **a more demanding**

aircraft

When assessing the possibility of operation of a more demanding aircraft than the reference aircraft of the aerodrome, the aerodrome should, amongst other issues, ...

Rationale: Some aircraft can represent a challenge to specific aerodromes without being "large".
An aircraft with the same code letter but different characteristics than the reference aircraft can also represent a challenge to specific aerodromes.

It is also proposed to add at the end of this section: "Some specific guidance can also be found in the Common Agreement Document of the AACG (A380 Airport Compatibility Group) and BACG (747-8 Airport Compatibility Group).

response

Noted

The intent of the relevant requirement, and, therefore, of the relevant Guidance Material, is to address the cases of operation of aircraft with a higher code letter at aerodromes or parts thereof.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART C
– ADDITIONAL OPERATOR RESPONSIBILITIES (ADR.OR.C) –
ADR.OR.C.030 – Occurrence reporting – GENERAL**

p. 65

comment

14 comment by: *ACI EUROPE - Airports Council International*
change to **AMC**.OR.C.030

Justification: AMC not IR

response

Accepted

The title has been amended.

comment

133 comment by: *CAA-NL*
Please add AMC in heading.

response

Accepted

The title has been amended.

comment

162 comment by: *Swedavia AB - Swedish airports (currently 11 airports)*
Change to heading AMC.OR.C.030.

response

Accepted

The title has been amended.

comment

340 comment by: *Avinor*

response	ADR.OR.C.030. Change to AMC.OR.C.030 since it is an AMC and not an IR. Accepted The title will be amended.
comment	542 comment by: <i>Flughafen Düsseldorf GmbH</i> Diese Forderung sollte in das AMC verschoben werden, da die Ausführungen zu detailliert für eine IR ist. Ist die Nennung hier überhaupt richtig?
response	Accepted The title has been amended.
comment	1068 comment by: <i>NATS National Air Traffic Services Limited</i> This should be "AMC1-ADR.OR.C.030". This AMC contains two "should" in two sentences thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.
response	Accepted The title has been amended.The Agency has reviewed the text to identify possible ways to avoid repeating such verbs.
comment	1465 comment by: <i>Cologne/Bonn Airport</i> Change to AMC.ADR.OR.C.30 since it is an AMC and not an IR
response	Accepted The title has been amended.
comment	1516 comment by: <i>Geneva International Airport (ROMIG)</i> Change the title to AMC.OR.C.030
response	Accepted The title has been amended.
comment	1705 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i> The ADR.OR.C.030 in Book II is probably an AMC or a GM
response	Accepted The title has been amended.
comment	2531 comment by: <i>ADV -German Airports Association</i>

	ADR.OR.C.030 change to AMC.ADR.OR.C.030 Justification: since it is an AMC and not an IR
response	Accepted The title has been amended.

comment	2542 comment by: <i>MST / STR - Stuttgart Airport</i> ADR.OR.C.030 change to AMC.ADR.OR.C.030 Justification: since it is an AMC and not an IR
response	Accepted The title has been amended.

comment	2635 comment by: <i>Fraport AG</i> ADR.OR.C.030 — Occurrence reporting Editorial ADR.OR.C.030 — Occurrence reporting Proposed Text AMC1-ADR.OR.C.030 — Occurrence reporting Fraport AG This is no IR
response	Accepted The title has been amended.

NPA 2011-20 (B.II) — AMC/GM to ANNEX II — Part -OR — SUBPART C — ADDITIONAL OPERATOR RESPONSIBILITIES (ADR.OR.C) — AMC1- ADR.OR.C.040 — Prevention of fire	p. 65
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comment	291 comment by: <i>BAA Airside operations</i> AMC1-ADR.OR.C.040. Add "in airside operational areas" after "prohibited" The area where smoking is prohibited should be defined as it is too broad when it does not specify the location.
response	Partially accepted Although the Implementing Rule has been amended and already defines

the areas where smoking is not to be permitted, the AMC is also amended.

comment 586 comment by: *Belfast International Airport - BFS/EGAA*

Consider adding "in airside operational areas" after "prohibited". The area where smoking is prohibited should be defined

response Partially accepted

Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.

comment 592 comment by: *Exeter International Airport*

AMC1-ADR.OR.C.040 : Add "in airside operational areas" after "prohibited". The area where smoking is prohibited should be defined as it is too broad when it does not specify the location.

response Partially accepted

Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.

comment 753 comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR.OR.C.040	Prevention of fire
Proposition/commentaire	<p>Ces règles sont des règles générales prises par les autorités de police et non pas par l'exploitant. En France, le code de l'aviation civile dispose que le préfet prend les mesures générales de protection contre l'incendie sur l'aéroport.</p> <p>ADP suggère donc de faire transformer en IR l'AMC modifié ci-dessous afin que l'exploitant d'aérodrome se contente de vérifier que des règles et procédures existent et qu'il n'ait pas à les établir lui-même.</p> <p>De plus, les règles prises par le préfet devraient être considérées comme des arrangements au sens de l'ADR.OR.C.005.</p> <p>Il convient de modifier de la manière suivante: "The aerodrome operator should develop verify procedures and assign responsibilities that exist for the control of smoking or activities that involve the use of fire hazard."</p>
Justification	<p>Voir aussi le 3ieme commentaire général du (B.I) n° 2867 et le commentaire du NPA 2011-20 (B.I) ADR.OR.C.040 n°3104</p> <p>En effet, l'exploitant ne peut pas s'assurer</p>

	<p>que personne ne fume sur l'aire de mouvement et il peut y avoir des zones pour fumeurs.</p>
<p>Traduction de courtoisie</p>	<p>These rules are general rules taken by the administrative police authorities and not by the aerodrome operator. The French civil aviation code states that the prefect shall establish general rules on fire prevention at the aerodrome.</p> <p>ADP suggests to turn into an IR the AMC1-ADR.OR.C.040, as amended below, that is to say that the aerodrome operator simply checks that rules and procedures exist and he/she does not have to establish them him/herself.</p> <p>Moreover, rules established by the prefect should be regarded as arrangements within the meaning of ADR.OR.C.005</p> <p>See also 3rd general comment on (B.I) n° 2867 and comment on NPA 2011-20 (B.I) ADR.OR.C.040 n°3104</p> <p>Indeed, the operator cannot ensure that no person smokes on the movement area and moreover there may be designated areas for smokers on the movement area of the aerodrome</p> <p>It is appropriate to modify in the following way: "The aerodrome operator should develop verify procedures and assign responsibilities that exist for the control of smoking or activities that involve the use of fire hazard."</p>

response

Noted

Fire risk has to be addressed and mitigated by the aerodrome operator's safety management system, through the establishment and implementation of relevant procedures. The related requirement and the AMC do not affect any relevant national legislation in place.

comment

858

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX II - Part-OR - ADR.OR.C.040 — Prevention of fire (p48)
- AMC/GM to Annex II – Part-OR – AMC1-ADR.OR.C.040

2. Justification and proposed text / comment

This comment is linked with comment 1113 in book I.
 Paragraph (a) of ADR.OR.C.040 is in contradiction with the French system

These rules are general rules taken by police authorities and not by the aerodrome operator. Local rules must be considered as arrangements. It is better to put the AMC more flexible in IR that is to say that the aerodrome operator just checks that rules and procedures exist and he/she does not have to establish them by him/herself. Indeed, the aerodrome operator cannot ensure that nobody smokes on the manoeuvring area and it may have smoking areas. It is appropriate to modify in the following way: "The aerodrome operator ~~should develop~~ **verify** procedures and ~~assign responsibilities~~ **that exist** for the control of smoking or activities that involve the use of fire hazard."

response

Noted

Fire risk has to be addressed and mitigated by the aerodrome operator's safety management system, through the establishment and implementation of relevant procedures. The related requirement and the AMC do not affect any relevant national legislation in place.

comment

1012

comment by: *Bristol Airport - BRS/EGGD*

AMC1- ADR.OR.C.040	Add "in airside operational areas" after "prohibited"	The area where smoking is prohibited should be defined as it is too broad when it does not specify the location.
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response

Partially accepted

Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.

comment

1069

comment by: *NATS National Air Traffic Services Limited*

This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.

The first paragraph refers to smoking, however the third paragraph states that smoking is prohibited. By what measures is smoking prohibited?

response

Noted

The first paragraph refers to assignment of responsibilities to ensure that no person smokes on the movement area in order to meet the relevant requirement. The third paragraph makes clear that authorisation of activities that involve danger of fire can involve other necessary activities, but not smoking.

comment

1163

comment by: *Gatwick Airport Ltd*

Add "in airside movement areas" after "prohibited"

Justification

	<p>The area where smoking is prohibited should be defined as it is too broad when it does not specify the location.</p>
response	<p><i>Partially accepted</i></p> <p>Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.</p>
comment	<p>1365 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #99</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.C.040</p> <p>Référence: AMC1-ADR.OR.C.040 Prevention of fire</p> <p>Traduction de courtoisie These rules are general rules taken by police authorities and not by the aerodrome operator. Local rules must be considered as arrangements. It is better to put the AMC more flexible in IR that is to say that the aerodrome operator just checks that rules and procedures exist and he/she does not have to establish them by him/herself. Indeed, the aerodrome operator cannot ensure that nobody smokes on the manoeuvring area and it may have smoking areas. It is appropriate to modify in the following way: "The aerodrome operator should develop verify procedures and assign responsibilities that exist for the control of smoking or activities that involve the use of fire hazard."</p>
response	<p>Noted</p> <p>Fire risk has to be addressed and mitigated by the aerodrome operator's safety management system, through the establishment and implementation of relevant procedures. The related requirement and the AMC do not affect any relevant national legislation in place.</p>
comment	<p>1572 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>These rules are general rules taken by police authorities and not by the aerodrome operator. Local rules must be considered as arrangements. It is better to put the AMC more flexible in IR that is to say that the aerodrome operator just checks that rules and procedures exist and he/she does not have to establish them by him/herself. Indeed, the aerodrome operator cannot ensure that nobody smokes on the manoeuvring area and it may have smoking areas.</p> <p>It is appropriate to modify in the following way: "The aerodrome operator should develop verify procedures and assign responsibilities that exist for the control of smoking or activities that involve the use of fire hazard."</p>
response	<p>Noted</p> <p>Fire risk has to be addressed and mitigated by the aerodrome operator's safety management system, through the establishment and</p>

implementation of relevant procedures. The related requirement and the AMC do not affect any relevant national legislation in place.

comment 1661 comment by: *Stansted Airport*
 AMC1-ADR.OR.C.040
 Add "in airside operational areas" after "prohibited"
 The area where smoking is prohibited should be defined as it is too broad when it does not specify the location.

response Partially accepted
 Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.

comment 1831 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*
 Attachment [#100](#)
 UAF NPA 2011-20 (B.II) AMC1-ADR.OR.C.040
 Référence: AMC1-ADR.OR.C.040
 Prevention of fire
 Traduction de courtoisie
 These rules are general rules taken by police authorities and not by the aerodrome operator.
 Local rules must be considered as arrangements.
 It is better to put the AMC more flexible in IR that is to say that the aerodrome operator just checks that rules and procedures exist and he/she does not have to establish them by him/herself.
 Indeed, the aerodrome operator cannot ensure that nobody smokes on the manoeuvring area and it may have smoking areas.
 It is appropriate to modify in the following way: "The aerodrome operator ~~should develop~~ **verify** procedures and ~~assign responsibilities~~ **that exist** for the control of smoking or activities that involve the use of fire hazard."

response Noted
 Fire risk has to be addressed and mitigated by the aerodrome operator's safety management system, through the establishment and implementation of relevant procedures. The related requirement and the AMC do not affect any relevant national legislation in place.

comment 1923 comment by: *Pau Pyrénées Airport - PUF/LFBP*
 These rules are general rules taken by police authorities and not by the aerodrome operator.
 Local rules must be considered as arrangements and **the rules taken by police authorities are priority to all.**
 It is better to put the AMC more flexible in IR that is to say that the aerodrome operator just checks that rules and procedures exist and he/she does not have to establish them by him/herself.
 Indeed, the aerodrome operator cannot ensure that nobody smokes on the

	<p>manoeuvring area and it may have smoking areas.</p> <p>It is appropriate to modify in the following way: "The aerodrome operator should develop verify procedures and assign responsibilities that exist for the control of smoking or activities that involve the use of fire hazard."</p>
response	<p>Noted</p> <p>Fire risk has to be addressed and mitigated by the aerodrome operator's safety management system, through the establishment and implementation of relevant procedures. The related requirement and the AMC do not affect any relevant national legislation in place.</p>
comment	<p>1933 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #101</p> <p>ADBM - NPA 2011-20 (B.II) AMC1-ADR.OR.C.040</p> <p>Référence: AMC1-ADR.OR.C.040 Prevention of fire</p> <p>Traduction de courtoisie These rules are general rules taken by police authorities and not by the aerodrome operator. Local rules must be considered as arrangements. It is better to put the AMC more flexible in IR that is to say that the aerodrome operator just checks that rules and procedures exist and he/she does not have to establish them by him/herself. Indeed, the aerodrome operator cannot ensure that nobody smokes on the manoeuvring area and it may have smoking areas. It is appropriate to modify in the following way: "The aerodrome operator should develop verify procedures and assign responsibilities that exist for the control of smoking or activities that involve the use of fire hazard."</p>
response	<p>Noted</p> <p>Fire risk has to be addressed and mitigated by the aerodrome operator's safety management system, through the establishment and implementation of relevant procedures. The related requirement and the AMC do not affect any relevant national legislation in place.</p>
comment	<p>2079 comment by: <i>Infratil Airports Europe Ltd</i></p> <p>Page No: 65</p> <p>Paragraph No: AMC1-ADR.OR.C.040</p> <p>Comment The area where smoking is prohibited should be defined as it is too broad when it does not specify the location. Add "in airside operational areas" after "prohibited"</p>
response	<p>Partially accepted</p> <p>Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.</p>

comment	<p>2130 comment by: <i>Aberdeen Airport Airside Operations</i></p> <p>Add "in airside operational areas" after "prohibited"</p> <p>The area where smoking is prohibited should be defined as it is too broad when it does not specify the location</p>				
response	<p>Partially accepted</p> <p>Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.</p>				
comment	<p>2322 comment by: <i>Norwich International Airport</i></p> <p>AMC1-ADR.OR.C.040</p> <p>Add "in airside operational areas" after "prohibited"</p> <p>The area where smoking is prohibited should be defined as it is too broad when it does not specify the location.</p>				
response	<p>Partially accepted</p> <p>Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.</p>				
comment	<p>2343 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>Add "in airside operational areas" after "prohibited"</p> <p>Justification: The area where smoking is prohibited should be defined as it is too broad when it does not specify the location.</p>				
response	<p>Partially accepted</p> <p>Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.</p>				
comment	<p>2370 comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i></p> <table border="1" data-bbox="383 1523 1396 1993"> <tr> <td data-bbox="383 1523 798 1601"><u>Référence: AMC1-ADR.OR.C.040</u></td> <td data-bbox="798 1523 1396 1601">Prevention of fire</td> </tr> <tr> <td data-bbox="383 1601 798 1993">Proposition/commentaire</td> <td data-bbox="798 1601 1396 1993"> <p>Ces règles sont des règles générales prises par les autorités de police et non pas par l'exploitant.</p> <p>Les règles locales type arrêté de police devraient être considérées comme des arrangements.</p> <p>Il est préférable de faire remonter l'AMC plus souple en IR c'est-à-dire que l'exploitant d'aérodrome se contente de vérifier que des règles et procédures existent et qu'il n'ait pas à les établir lui-même.</p> </td> </tr> </table>	<u>Référence: AMC1-ADR.OR.C.040</u>	Prevention of fire	Proposition/commentaire	<p>Ces règles sont des règles générales prises par les autorités de police et non pas par l'exploitant.</p> <p>Les règles locales type arrêté de police devraient être considérées comme des arrangements.</p> <p>Il est préférable de faire remonter l'AMC plus souple en IR c'est-à-dire que l'exploitant d'aérodrome se contente de vérifier que des règles et procédures existent et qu'il n'ait pas à les établir lui-même.</p>
<u>Référence: AMC1-ADR.OR.C.040</u>	Prevention of fire				
Proposition/commentaire	<p>Ces règles sont des règles générales prises par les autorités de police et non pas par l'exploitant.</p> <p>Les règles locales type arrêté de police devraient être considérées comme des arrangements.</p> <p>Il est préférable de faire remonter l'AMC plus souple en IR c'est-à-dire que l'exploitant d'aérodrome se contente de vérifier que des règles et procédures existent et qu'il n'ait pas à les établir lui-même.</p>				

	<p>Il convient de modifier de la manière suivante: "The aerodrome operator should develop verify procedures and assign responsibilities that exist for the control of smoking or activities that involve the use of fire hazard."</p>
Justification	<p>En effet, l'exploitant ne peut pas s'assurer que personne ne fume sur l'aire de mouvement et il peut y avoir des zones pour fumeurs.</p>
Traduction de courtoisie	<p>These rules are general rules taken by police authorities and not by the aerodrome operator. Local rules must be considered as arrangements. It is better to put the AMC more flexible in IR that is to say that the aerodrome operator just checks that rules and procedures exist and he/she does not have to establish them by him/herself. Indeed, the aerodrome operator cannot ensure that nobody smokes on the manoeuvring area and it may have smoking areas.</p> <p>It is appropriate to modify in the following way: "The aerodrome operator should develop verify procedures and assign responsibilities that exist for the control of smoking or activities that involve the use of fire hazard."</p>

response

Noted

Fire risk has to be addressed and mitigated by the aerodrome operator's safety management system, through the establishment and implementation of relevant procedures. The related requirement and the AMC do not affect any relevant national legislation in place.

comment

2440

comment by: *London Biggin Hill Airport*

AMC1.ADR.OR.C.040 Add "in airside operational areas" after "prohibited"
 The area where smoking is prohibited should be defined as it is too broad when it does not specify the location.

response

Partially accepted

Although the Implementing Rule has been amended and already defines the areas where smoking is not to be permitted, the AMC is also amended.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR. D.005(a)(2) –
Management – QUALITY MANAGEMENT SYSTEM**

p. 66

comment 471 comment by: *Icelandic Civil Aviation Administration*
Editorial: The name of AMC1-ADR.OR. D.005(a)(2) has an incorrect reference, shall refer to ADR.OR.D.007.

response *Accepted*
The title of the AMC has been amended.

comment 807 comment by: *Finnish Transport Safety Agency*
Editorial: The name of AMC1-ADR.OR. D.005(a)(2) has an incorrect reference, shall refer to ADR.OR.D.007.

response *Accepted*
The title of the AMC has been amended.

comment 838 comment by: *MST / STR - Stuttgart Airport*
Vgl. ergänzend zu (IR) ADR.OR.D.005:

- Es sollte deutlicher hervorgehoben werden, dass
- (1) sich das QM-System nur auf die aeronautical data bezieht und
- (2) dass neben ISO 9001 auch ein anderweitiger Nachweis möglich ist ohne gleich eine AMOC (Alternative Means of Compliance) auf den Weg bringen zu müssen. Hier ist größere Flexibilität erforderlich - und zwar bereits im Wortlaut.

response *Noted*
This AMC is linked to a requirement for aeronautical data and related activities. In addition, apart from the title of the AMC, its purpose is made clear in paragraph (a) of the AMC. The use of an alternative means of compliance, for all EASA AMC, is possible, in accordance with the requirement ADR.OR.A.015.

comment 1022 comment by: *Swedish Regional Airport Association*
Regulate what should be managed, not how it should be organized. Move details to GM.

response *Noted*

comment 1249 comment by: *UK CAA*

Page No: 66

Paragraph No: AMC1 - ADR.OR.D.005(a)(2) - Quality Management System

Comment: The European Commission adopted on 26 January 2010 the Regulation EC 73/2010 laying down requirements on the quality of aeronautical data and aeronautical information for the single European sky. The overall objective of this rule is to achieve aeronautical information of sufficient quality, accuracy, timeliness and granularity as a key enabler of the European ATM Network.

Working Group comment against cross reference to EC 73/2010 states that there is no proposal and the article was added by the agency. EC member states are currently working towards implementation of the requirements by July 2013.

It is of concern that this regulation has not been considered when developing the NPA in respect of the Management of aeronautical data and aeronautical information.

Immediate action is required to address this oversight and ensure harmonisation of the Authority, Organisation and Operations Requirements for Aerodromes with EC 73/2010.

Additional sections of the NPA affect by this anomaly are listed below. This is not intended to be an comprehensive list and the entire NPA should be assessed in respect of all references to data management within document:

The draft Commission Regulation NPA 2011-20 (B.II)

- a. AMC2 - ADR.OR.D.005(a)(2) (page 66) - Security Management for Aeronautical Data & Information Provision Activities
- b. AMC - ADR - OPS.A.010 (page 126 to 130) - Data Quality Requirements
- c. AMC - ADR - OPS.A.015 (page 131) - Co-ordination with AIS.

response

Accepted

The Agency has amended the relevant requirements to address this issue.

comment

1435

comment by: *Swedish Transport Agency*

Editorial: The name of AMC1-ADR.OR. D.005(a)(2) has an incorrect reference, shall refer to ADR.OR.D.007.

response

Accepted

The title of the AMC has been amended.

comment

1706

comment by: *ENAC Ente Nazionale per l'Aviazione Civile*

The AMC1 -ADR.OR. D 005 (a2) - managment and AMC2-ADR.OR. D 005

response	(a2) - managment to be readressed under D.007 Accepted The title of the AMC has been amended.
comment	1725 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i> Modify AMC1-ADR.OR.D.005 (a)(2) in AMC1-ADR.OR.D.007
response	Accepted The title of the AMC has been amended.
comment	1768 comment by: <i>CAA CZ</i> Comment by Karlovy Vary airport We proposed new wording of whole paragraphs : AMC1-ADR.OR. D.005(a)(2) – Management Reference is made to a non-existing paragraph ADR.OR.D.005(a)(2), should be ADR.OR.D.007(a)? As far as QMS is concerned it is not quite clear why it is related only to management of aeronautical data and information. If the aerodrome operator implemented a QMS in compliance with EN ISO 9001 it should cover the whole organization not only the aeronautical data.
response	Accepted The heading of the AMC has been amended. The intent of the relevant requirement which is based on a relevant ICAO requirement relating to aeronautical data is to ensure consistency with Commission Regulation (EU) No 73/2010. The requirement and the relevant AMC do not limit an aerodrome operator to extend the areas covered by such certification.
comment	1816 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i> (a) The content of the AMC appears to be misleading in fact even if the heading makes reference to the aeronautical data and aeronautical information the duties allocated to the quality management systems are too general and an overlap with the compliance monitoring system is envisaged.
response	Partially accepted Compliance monitoring is part of the overall management system of the aerodrome organisation. An aerodrome operator can make use of its compliance monitoring to ensure compliance with the relevant requirement for the management of aeronautical data and infomation. To make this more evident, the Agency has provided relevant Guidance Material to address this issue.
comment	2098 comment by: <i>HIA - Highlands and Islands Airports Limited</i> AMC1-ADR.OR.D005 (a) (2) (b) - EN ISO 9001 certificate is considered as a sufficient means of compliance.

	Is this the only means or would there be any other acceptable means of compliance ie equivalent systems in place?
response	Noted If so wishes, an aerodrome operator can make use of an alternative means of compliance, in accordance with the requirement ADR.OR.A.015.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC2-ADR.OR.D.005(a)(2) – Management – SECURITY MANAGEMENT FOR AERONAUTICAL DATA AND AERONAUTICAL INFORMATION PROVISION ACTIVITIES	p. 66
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comment	163 (a) (2), (b) (1) Suggest change into GM instead of AMC, too detailed otherwise.	comment by: <i>Swedavia AB - Swedish airports (currently 11 airports)</i>
response	Noted The Agency believe that AMC is the appropriate level for such material.	

comment	1070 There are two AMC to ADR.OR.D.005(a)(2) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance? Suggest merging the two AMC into a single AMC. There is no ADR.OR.D.005(a)(2) for this to be AMC for. ADR.OR.D.005 is on "Management". ADR.OR.D.007 is about "Management of aeronautical data and aeronautical information" but there is no (a)(2).	comment by: <i>NATS National Air Traffic Services Limited</i>
response	Partially accepted The Agency has reviewed and amended the title of the AMC to ensure correct numbering. The existence of the two different AMCs is justified by the difference in their content.	

comment	1251 Page No: 66 Paragraph No: AMC2-ADR.OR.D.005 (a)(2) Comment: The title is misleading. Aeronautical Data and Aeronautical Information are covered in Reg EU 73/2010 laying down requirements on the quality of data and aeronautical information for the single sky (ADQ1) and ADQ2. The title of this section should simply be Security Management	comment by: <i>UK CAA</i>
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	<p>for Aerodromes and references to subjects pertaining to ADQ removed.</p> <p>Justification: Clarification</p> <p>Proposed Text: Replace title with Security Management for Aerodromes.</p>
response	<p>Partially accepted</p> <p>The title of the AMC has been amended in order to align with the title of the relevant requirement of the Implementing Rule, which is based on the relevant essential requirements of Annex Va of the Basic Regulation.</p>
comment	<p>1729 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i></p> <p>Modify AMC2-ADR.OR.D.005(a)(2) in AMC2-ADR.OR.D.007</p>
response	<p>Accepted</p> <p>The title of the AMC has been amended.</p>
comment	<p>1769 comment by: <i>CAA CZ</i></p> <p>Comment by Karlovy Vary airport We proposed modified wording of following paragraph : AMC2-ADR.OR.D.005(a)(2) – Management SECURITY MANAGEMENT FOR AERONAUTICAL DATA AND AERONAUTICAL INFORMATION PROVISION ACTIVITIES (a) The security management objectives should be: (1) to ensure the security of aeronautical data and aeronautical information received, produced or otherwise employed so that it is protected from interference and access to it is restricted only to those authorised; and</p>
response	<p>Accepted</p> <p>The text has been amended accordingly.</p>
comment	<p>1906 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• NPA 2011-20 (BII)-AMC2-ADR.OR.D.005 (a)(2) – Management (p66) <p><u>2. Justification and proposed text / comment</u> NPA 2011-20 (BII)-AMC2-ADR.OR.D.005 (a)(2) – Management-Security management for aeronautical data and aeronautical information provision activities contains specifications relating to the management of aeronautical data and therefore should have been numbered AMC2-ADR.OR.D.007 in consistence with the relevant IR. However, the security management is not mandatory in ADR.OR.D.007 as in ICAO Annex 14 Volume 1 Chapter 2. In addition the provision of aeronautical information is the responsibility of the AIS and not of the aerodrome operator. Hence this AMC is irrelevant. Therefore DGAC proposes to delete AMC2-ADR.OR.D.005 (a)(2)-</p>

	Management
response	<p>Partially accepted</p> <p>The heading of the AMC has been amended. However, the Agency does not share the view that the AMC is irrelevant to the relevant requirement contained in the Implementing Rule. In fact, the Implementing Rule requires the aerodrome operator to define procedures to meet the security objectives, which are contained in the AMC, while an aerodrome operator may also be involved in aeronautical provision activities.</p>
comment	<p>2099 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>AMC2-ADR.OR.D005 (a) (2) (b) - ISO standars areconsidered as a sufficient means of compliance.</p> <p>Are these the only means or would there be any other acceptable means of compliance ie equivalent systems in place?</p>
response	<p>Noted</p> <p>If so wishes, an aerodrome operator can make use of an alternative means of compliance, in accordance with the requirement ADR.OR.A.015.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR. D.005(b)(1) – Management – SAFETY MANAGEMENT SYSTEM</p>	<p>p. 67</p>
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comment	<p>533 comment by: <i>Flughafen Düsseldorf GmbH</i></p> <p>Grundsätzlich kann der Inhalt lediglich GM sein, da er teilweise neu bzw. lediglich von einer Richtlinie (Doc 9859) abgeleitet wurde.</p> <p>In wie fern machen Safety Office und Safety Review Board in der beschriebenen Aufgabenfülle bei kleineren und mittelgroßen Flughäfen Sinn? Forderung wird danach gleich entkräftet durch „or similar“. Hier kann auch nicht mit einer Studie oder einem Gutachten ermittelt werden, ob ein ähnlich praktiziertes System analog funktioniert oder eben nicht. Auch hier müsste man zunächst ermitteln wie groß der Nutzen der beschriebenen Verfahren ist und dann ermitteln ob das analog, von kleineren und mittelgroßen Airports praktizierte System diesen Nutzen auch bieten kann. Dies zu beweisen wäre sicherlich sehr kosten- und zeitaufwendig. Daher wäre auch aus diesem Grunde eine Verschiebung der SMS AMCs in das GM sinnvoll. Mit all den genauen und detaillierten Forderungen in dieser Form ist eine Umsetzung als AMC gar nicht möglich bei Erhalt des Aufwand-Nutzen-Verhältnisses.</p> <p>b) 2) Das ist nicht zwingend erforderlich. Vertreter der oberen Führungsebenen sollten ausreichend sein. Die Geschäftsführung hat normalerweise zeitliche Probleme.</p>
response	<p>Partially accepted</p> <p>The Agency has the view that the text, which is based on ICAO Doc 9859, should be at AMC level. However, the text has been amended to allow for</p>

more flexibility for less complex organisations, while reference to ICAO Doc 9859 will be omitted. Finally, the Agency believes that participation of higher management is necessary at Safety Review Board meetings.

comment	593	comment by: <i>Exeter International Airport</i>
	AMC-ADR.OR.D.005(b)(1)(a)(1) - Add after operational units "although the management organisation should be commensurate to the size of the organisation". In smaller aerodromes independent and neutral is not practical in terms of management resource.	
response	Partially accepted	
	The relevant AMC has been amended to allow for more flexibility for less complex organisations	

comment	754	comment by: <i>ADP : Aeroports de Paris</i>								
	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Référence: AMC1-ADR.OR.D.005(b)(1)</td> <td>Management SAFETY MANAGEMENT SYSTEM</td> </tr> <tr> <td>Proposition/commentaire</td> <td>(b)(5) Il convient de supprimer ce paragraphe.</td> </tr> <tr> <td>Justification</td> <td>Cette disposition est inutile car il s'agit du " safety review board" d'un seul aéroport et les autres aéroports n'ont pas à y figurer.</td> </tr> <tr> <td>Traduction de courtoisie</td> <td>(b) (5) It is appropriate to delete this paragraph. This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in.</td> </tr> </table>		Référence: AMC1-ADR.OR.D.005(b)(1)	Management SAFETY MANAGEMENT SYSTEM	Proposition/commentaire	(b)(5) Il convient de supprimer ce paragraphe.	Justification	Cette disposition est inutile car il s'agit du " safety review board" d'un seul aéroport et les autres aéroports n'ont pas à y figurer.	Traduction de courtoisie	(b) (5) It is appropriate to delete this paragraph. This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in.
Référence: AMC1-ADR.OR.D.005(b)(1)	Management SAFETY MANAGEMENT SYSTEM									
Proposition/commentaire	(b)(5) Il convient de supprimer ce paragraphe.									
Justification	Cette disposition est inutile car il s'agit du " safety review board" d'un seul aéroport et les autres aéroports n'ont pas à y figurer.									
Traduction de courtoisie	(b) (5) It is appropriate to delete this paragraph. This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in.									
response	Accepted									
	The relevant text has been amended in the suggested direction, to provide more options for the functioning of the Safety Review Board for the case of operators of multiple aerodromes.									

comment	771	comment by: <i>Airport Nuremberg - NUE/EDDN</i>
	Especially for small and medium sized aerodromes the realization of this regulation is very difficult and problematic. By adding the phrase "or similar" at the end of the introduction it becomes even less clear, what exactly is meant by that instruction. In this circumstance not even a case study or an experts testimony can demonstrate that a similar institution to a Safety Review Board offers an equivalent level of safety. To evaluate the efficiency of that system it would have to be identified what benefit the described system with Safety Services Office and Safety Review Board offers and then it needs to be identified whether the system, practiced by	

response

small and medium sized aerodromes offers the same benefit. To prove that efforts a lot in time and additional costs. **Therefore this AMC must be moved as guidance material! Neither national legislation nor ICAO Annex 14 require that!**

Partially accepted

The Agency has the view that the text, which is based on ICAO Doc 9859, should be at AMC level. However, the text has been amended to allow for more flexibility for less complex organisations. In any case, the aerodrome operator should evaluate its needs and establish an appropriate organisational structure.

comment

857

comment by: *MST / STR - Stuttgart Airport*

Zu ADR.OR.D.005 (b) (1) ff.:

- Es fällt auf, dass es sich **hier weit überwiegend um völlig neue Anforderungen** handelt, für die es bisher so keine Referenz gibt, weder in ICAO noch in den zugrunde liegenden Basisverordnungen. Weshalb werden die Anforderungen an die Organisation so detailliert in den AMC geregelt? Das ist in dieser Regelungstiefe nicht erforderlich.
- **Es würde völlig ausreichen, den gesamten Katalog des Abschnitts (b) ff. als Beispiele in das GM zu verschieben. Das ist unbedingt erforderlich.**
- Dies sollte unbedingt erfolgen, da insbesondere der gesamte Katalog des Abschnitts AMC1-ADR.OR.D.005 (b) ff. mit den bestehenden Ressourcen an den Flughäfen nicht bewältigt werden kann.
- Vor allem für die kleineren Plätze bedeutet dies eine Überforderung, da der Aufbau neuer Ressourcen nicht möglich sein wird. Selbst für größere Flughäfen steigen die Anforderungen und der damit verbundene personelle und finanzielle Aufwand enorm. Mit den bestehenden Organisationen kann das nicht erfüllt werden!
- Letztlich ist es unverhältnismäßig, den gesamten Katalog im AMC-Teil zu belassen. Die Flexibilität bleibt nur dann gewahrt, wenn man zwar auf das GM zurückgreifen kann, dies aber nicht bereits in Form einer AMC (und damit als "sichere" Umsetzung der IR) definiert wird.
- Die zuständige Behörde wird sich nämlich im Zweifel gerade auf diese AMC berufen, um sich gegenüber der EASA abzusichern. Damit wird man der jeweiligen lokalen Situation an einem Flughafen überhaupt nicht mehr gerecht. Der Weg über eventuell zu beschreibende "AMOC" (Alternative Means of Compliance") reicht an dieser Stelle nicht aus bzw. ist zu starr.
- Ein wirklich flexibles Vorgehen auf Basis der Standortgröße, der Größe der Organisation, der zur Verfügung stehenden Ressourcen etc. bleibt also nur dann möglich, wenn diese Anforderungen ins

	GM verschoben werden.
response	<p>Partially accepted</p> <p>The Agency has the view that the text, which is based on ICAO Doc 9859, should be at AMC level. However, the text has been amended to allow for more flexibility for less complex organisations. In any case, the aerodrome operator should evaluate its needs and establish an appropriate organisational structure.</p>
comment	<p>890 comment by: <i>Union des Aéroports français - UAF</i></p> <p>Attachment #102</p> <p>UAF NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(1)</p> <p>Référence: AMC1-ADR.OR.D.005(b)(1) Management SAFETY MANAGEMENT SYSTEM</p> <p>Traduction de courtoisie (b) (5) It is appropriate to delete this paragraph. This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in.</p>
response	<p>Partially accepted</p> <p>The text has been amended so as to cover the case of centrally or locally established safety review boards.</p>
comment	<p>1288 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #103</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(1)</p> <p>Référence: AMC1-ADR.OR.D.005(b)(1) Management SAFETY MANAGEMENT SYSTEM</p> <p>Traduction de courtoisie (b) (5) It is appropriate to delete this paragraph. This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in.</p>
response	<p>Partially accepted</p> <p>The text has been amended so as to cover the case of centrally or locally established safety review boards.</p>
comment	<p>1531 comment by: <i>Flughafen Graz Betriebs GmbH</i></p> <p>In wie fern machen Safety Office und Safety Review Board in der beschriebenen Aufgabenfülle bei kleineren und mittelgroßen Flughäfen Sinn? Forderung wird danach gleich entkräftet durch „or similar“. Hier kann auch</p>

nicht mit einer Studie oder einem Gutachten ermittelt werden, ob ein ähnlich praktiziertes System analog funktioniert oder eben nicht. Auch hier müsste man zunächst ermitteln wie groß der Nutzen der beschriebenen Verfahren ist und dann ermitteln ob das analoge, von kleineren und mittelgroßen Airports praktizierte System diesen Nutzen auch bieten kann. Dies zu beweisen wäre sicherlich sehr kosten- und zeitaufwendig. → Daher gilt weiterhin die Verschiebung der SMS AMCs als GM. Mit all den genauen und detaillierten Forderungen in dieser Form ist eine Umsetzung als AMC gar nicht möglich bei Erhalt des Aufwand-Nutzen Verhältnisses.

response

Partially accepted

The Agency has the view that the text, which is based on ICAO Doc 9859, should be at AMC level. However, the text has been amended to allow for more flexibility for less complex organisations. In any case, the aerodrome operator should evaluate its needs and establish an appropriate organisational structure.

comment

1552

comment by: *Aéroport de Marseille - MRS/LFML*

(b) (5) It is appropriate to delete this paragraph.
This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in

response

Partially accepted

The text has been amended so as to cover the case of centrally or locally established safety review boards.

comment

1820

comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#104](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(1)

Référence: AMC1-ADR.OR.D.005(b)(1)

Management SAFETY MANAGEMENT SYSTEM

Traduction de courtoisie
(b) (5) It is appropriate to delete this paragraph.
This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in.

response

Partially accepted

The text has been amended so as to cover the case of centrally or locally established safety review boards.

comment

1921

comment by: *Pau Pyrénées Airport - PUF/LFBP*

(b) (5) It is appropriate to delete this paragraph.
This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in.

response

Partially accepted

The text has been amended so as to cover the case of centrally or locally established safety review boards.

comment

1940 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#105](#)

ADBM - NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(1)

Référence: AMC1-ADR.OR.D.005(b)(1)
Management
SAFETY MANAGEMENT SYSTEM

Traduction de courtoisie
(b) (5) It is appropriate to delete this paragraph.
This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in.

response

Partially accepted

The text has been amended so as to cover the case of centrally or locally established safety review boards.

comment

1965 comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- NPA 2011-20 (B II)-AMC1-ADR.OR.D.005 (b)(1) – Management (p67)

2. Justification and proposed text / comment

In AMC2-ADR.OR.D.005 (b)(1) paragraph (b)(5), operators of multiple aerodromes should ensure that all aerodromes are represented in the Safety Review Board.

This is only an option, as each aerodrome is specific, and it can not be appropriate to combine safety review boards for operators of two aerodromes among which one which would have a lot of traffic, and another which would have very few traffic. For example, safety reviews will not always be combined for orly and Roissy-CDG.

Other means could be used to ensure the coordination of safety reviews of all aerodromes.

However, this possibility can be added in a GM.

Therefore DGAC proposes to delete sub-paragraph (b)(5) in AMC1-ADR.OR.D.005 (b)(1):

- **AMC1-ADR.OR. D.005(b)(1) – Management**
SAFETY MANAGEMENT SYSTEM
"[...]
(5) ~~Operators of multiple aerodromes should ensure that all aerodromes are represented in the Safety Review Board, at the appropriate management level.~~"

response

Partially accepted

The text has been amended so as to cover the case of centrally or locally

established safety review boards.

comment

2124

comment by: AENA - Aeropuertos Españoles y Navegación Aérea

In AMC2-ADR.OR.D.005 (b)(1) paragraph (b)(5), operators of multiple aerodromes should ensure that all aerodromes are represented in the Safety Review Board.

This is only an option, as each aerodrome is specific, and it can not be appropriate to combine safety review boards for operators of varios aerodromes among which some which would have a lot of traffic, and othres which would have very few traffic. For example, safety reviews will not always be combined for all the Aena Airports.

Other means could be used to ensure the coordination of safety reviews of all aerodromes.

However, this possibility can be added in a GM.

Therefore It is proposed to delete sub-paragraph (b)(5) in AMC1-ADR.OR.D.005 (b)(1):

- **AMC1-ADR.OR. D.005(b)(1) – Management**

SAFETY MANAGEMENT SYSTEM

"[...]"

~~(5) Operators of multiple aerodromes should ensure that all aerodromes are represented in the Safety Review Board, at the appropriate management level."~~

response

Partially accepted

The text has been amended so as to cover the case of centrally or locally established safety review boards.

comment

2351

comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence: AMC1-ADR.OR.D.005(b)(1)	Management SAFETY MANAGEMENT SYSTEM
Proposition/commentaire	(b)(5) Il convient de supprimer ce paragraphe.
Justification	Cette disposition est inutile car il s'agit du " safety review board" d'un seul aéroport et les autres aéroports n'ont pas à y figurer.
Traduction de courtoisie	(b) (5) It is appropriate to delete this paragraph. This provision is useless because it is about the « safety review board » of one aerodrome, so, the other aerodromes do not have to be in.

response

Partially accepted

The text has been amended so as to cover the case of centrally or locally established safety review boards.

comment

2521

comment by: *ADV -German Airports Association*

**AMC 1-ADR.OR. D.005(b)(1) – Management
SAFETY MANAGEMENT SYSTEM**

The safety management system of an aerodrome operator should include an organisational structure for the management of safety proportionate and appropriate to the size of the organisation and the nature and type of operations. Clearly defined lines of responsibilities, authorisations and accountabilities within the organisation should be identified. Depending on the organisational complexity and structure, this should include a Safety Services Office and a Safety Review Board **or similar**.

(a) Safety Services Office

(1) The Safety Services Office should be independent and neutral in terms of the processes and decisions made regarding the delivery of services by the line managers of operational units;

(2) The function of the Safety Services Office should be to:

(i) manage and oversee the hazard identification system;

(ii) monitor safety performance of operational units directly involved in aerodrome operations;

(iii) advise senior management on safety management matters; and

(iv) assist line managers with safety management matters;

(3) Operators of multiple aerodromes should either establish a central Safety Services Office and appropriate safety departments/functions at all aerodromes or separate Safety Services Office at each aerodrome. Arrangements should be made to ensure continuous flow of information and adequate coordination.

(b) Safety Review Board

(1) The Safety Review Board should be a high level committee that considers matters of strategic safety in support of the accountable manager's safety accountability;

(2) The board should be chaired by the accountable manager and be composed of heads of functional areas;

(3) The Safety Review Board should monitor:

(i) safety performance against the safety policy and objectives; (ii) that any safety action is taken in a timely manner; and

(iii) the effectiveness of the organisation's safety management system

(4) The Safety Review Board should ensure that appropriate resources are allocated to achieve the established safety performance.

(5) Operators of multiple aerodromes should ensure that all aerodromes are represented in the Safety Review Board, at the appropriate management level.

In wie fern machen Safety Office und Safety Review Board in der beschriebenen Aufgabenfülle bei kleineren und mittelgroßen Flughäfen Sinn? Forderung wird danach gleich entkräftet durch „or similar“. Hier kann auch nicht mit einer Studie oder einem Gutachten ermittelt werden, ob ein ähnlich praktiziertes System analog funktioniert oder eben nicht. Auch hier müsste man zunächst ermitteln wie groß der Nutzen der beschriebenen Verfahren ist und dann ermitteln ob das analoge, von kleineren und mittelgroßen Airports praktizierte System diesen Nutzen auch bieten kann. Dies zu beweisen wäre sicherlich sehr kosten-und zeitaufwendig. → Daher gilt weiterhin die Verschiebung der SMS AMCs

als GM. Mit all den genauen und detaillierten Forderungen in dieser Form ist eine Umsetzung als AMC gar nicht möglich bei Erhalt des Aufwand-Nutzen Verhältnisses.

response Partially accepted

The Agency has the view that the text, which is based on ICAO Doc 9859, should be at AMC level. However, the text has been amended to allow for more flexibility for less complex organisations. In any case, the aerodrome operator should evaluate its needs and establish an appropriate organisational structure.

comment

2552

comment by: *MST / STR - Stuttgart Airport*

AMC 1-ADR.OR. D.005(b)(1) – Management

SAFETY MANAGEMENT SYSTEM

The safety management system of an aerodrome operator should include an organisational structure for the management of safety proportionate and appropriate to the size of the organisation and the nature and type of operations. Clearly defined lines of responsibilities, authorisations and accountabilities within the organisation should be identified. Depending on the organisational complexity and structure, this should include a Safety Services Office and a Safety Review Board **or similar**.

(a) Safety Services Office

(1) The Safety Services Office should be independent and neutral in terms of the processes and decisions made regarding the delivery of services by the line managers of operational units;

(2) The function of the Safety Services Office should be to:

(i) manage and oversee the hazard identification system;

(ii) monitor safety performance of operational units directly involved in aerodrome operations;

(iii) advise senior management on safety management matters; and

(iv) assist line managers with safety management matters;

(3) Operators of multiple aerodromes should either establish a central Safety Services Office and appropriate safety departments/functions at all aerodromes or separate Safety Services Office at each aerodrome. Arrangements should be made to ensure continuous flow of information and adequate coordination. (b) Safety Review Board

(1) The Safety Review Board should be a high level committee that considers matters of strategic safety in support of the accountable manager's safety accountability;

(2) The board should be chaired by the accountable manager and be composed of heads of functional areas;

(3) The Safety Review Board should monitor:

(i) safety performance against the safety policy and objectives; (ii) that any safety action is taken in a timely manner; and

(iii) the effectiveness of the organisation's safety management system

(4) The Safety Review Board should ensure that appropriate resources are allocated to achieve the established safety performance.

(5) Operators of multiple aerodromes should ensure that all aerodromes are represented in the Safety Review Board, at the appropriate management level.

In wie fern machen Safety Office und Safety Review Board in der

beschriebenen Aufgabenfülle bei kleineren und mittelgroßen Flughäfen Sinn? Forderung wird danach gleich entkräftet durch „or similar“. Hier kann auch nicht mit einer Studie oder einem Gutachten ermittelt werden, ob ein ähnlich praktiziertes System analog funktioniert oder eben nicht. Auch hier müsste man zunächst ermitteln wie groß der Nutzen der beschriebenen Verfahren ist und dann ermitteln ob das analoge, von kleineren und mittelgroßen Airports praktizierte System diesen Nutzen auch bieten kann. Dies zu beweisen wäre sicherlich sehr kosten- und zeitaufwendig. ◊ Daher gilt weiterhin die Verschiebung der SMS AMCs als GM. Mit all den genauen und detaillierten Forderungen in dieser Form ist eine Umsetzung als AMC gar nicht möglich bei Erhalt des Aufwand-Nutzen-Verhältnisses.

response

Partially accepted

The Agency has the view that the text, which is based on ICAO Doc 9859, should be at AMC level. However, the text has been amended to allow for more flexibility for less complex organisations. In any case, the aerodrome operator should evaluate its needs and establish an appropriate organisational structure.

comment

2619

comment by: *ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen*

AMC 1-ADR.OR. D.005(b)(1) – Management
SAFETY MANAGEMENT SYSTEM

In wie fern machen Safety Office und Safety Review Board in der beschriebenen Aufgabenfülle bei kleineren und mittelgroßen Flughäfen Sinn? Forderung wird danach gleich entkräftet durch „or similar“. Hier kann auch nicht mit einer Studie oder einem Gutachten ermittelt werden, ob ein ähnlich praktiziertes System analog funktioniert oder eben nicht. Auch hier müsste man zunächst ermitteln wie groß der Nutzen der beschriebenen Verfahren ist und dann ermitteln ob das analoge, von kleineren und mittelgroßen Airports praktizierte System diesen Nutzen auch bieten kann. Dies zu beweisen wäre sicherlich sehr kosten- und zeitaufwendig. ◊ Daher gilt weiterhin die Verschiebung der SMS AMCs als GM. Mit all den genauen und detaillierten Forderungen in dieser Form ist eine Umsetzung als AMC gar nicht möglich bei Erhalt des Aufwand-Nutzen-Verhältnisses.

response

Partially accepted

The Agency has the view that the text, which is based on ICAO Doc 9859, should be at AMC level. However, the text has been amended to allow for more flexibility for less complex organisations. In any case, the aerodrome operator should evaluate its needs and establish an appropriate organisational structure.

comment	580	comment by: Flughafen Düsseldorf GmbH
	<p>Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und nochmal auf Plausibilität überprüft werden müssen.</p> <p>Zu Safety Service Office) Warum taucht hier nicht der etablierte Begriff "Safety Manager" auf? Dies wäre für die Eindeutigkeit sinnvoll.</p> <p>Zu Safety Action Group) Abgrenzung zum Safety Service Office schwierig. In der Praxis gehen die Aufgaben ineinander über. In kleineren Organisationen ist eine Umsetzung problematisch.</p>	
response	<p><i>Partially accepted</i></p> <p>The relevant text is based on ICAO Doc 9859. However, the text in the relevant AMC1-ADR.OR. D.005(b)(1) has been amended to allow for more flexibility for non-complex organisations, while the responsibilities of the Safety Manager have been clarified in relation to the Safety Services Office, thus making unnecessary the first part of this Guidance Material. Finally, the Agency does not share the view that it is difficult to differentiate between the Safety Services Office and the Safety Action Group(s).</p>	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR. D.005(b)(2) – Management – SAFETY POLICY	p. 68-69
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comment	1023	comment by: Swedish Regional Airport Association
	<p>use ALARP.. Highest safety standard is not always possible..</p>	
response	<p>Noted</p> <p>Improvement of the system is not compatible with the ALARP principle.</p>	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM1-ADR.OR. D.005(b)(2) – Management – SAFETY POLICY	p. 69
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comment	691	comment by: Flughafen Düsseldorf GmbH
	<p>Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und Plausibilität überprüft werden müssen.</p>	
response	<p>Accepted</p> <p>Reference to ICAO Doc 9859 will be removed.</p>	

comment	1071	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are three GM to ADR.OR.D.005(b)(2) which are three distinct pieces of GM and all apply. This is contrary to previous EASA drafting. Suggest merging the GM into a single GM.	
response	Accepted	
	The different Guidance Material will be combined.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM2-ADR.OR. D.005(b)(2) – Management – EXAMPLE SAFETY POLICY SAFETY POLICY STATEMENT	p. 69-70
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comment	692	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und Plausibilität überprüft werden müssen.	
response	Noted	
	This Guidance Material has been reviewed and removed.	

comment	1072	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are three GM to ADR.OR.D.005(b)(2) which are three distinct pieces of GM and all apply. This is contrary to previous EASA drafting principles. Suggest merging the GM into a single GM.	
response	Noted	
	This Guidance Material has been reviewed and removed.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM3-ADR.OR. D.005(b)(2) – Management – SAFETY POLICY – JUST CULTURE	p. 70
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comment	693	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und Plausibilität überprüft werden müssen.	
response	Accepted	
	Reference to ICAO Doc 9859 will be removed.	

comment	1073	comment by: <i>NATS National Air Traffic Services Limited</i>
	<u>3 comments</u>	

1. There are three GM to ADR.OR.D.005(b)(2) which are three distinct pieces of GM and all apply. This is contrary to previous EASA drafting principles. Suggest merging the GM into a single GM.
2. This GM contains a "should" which suggest that it should be AMC rather than GM.
3. The inclusion of "just culture" within the organisations safety policy is fully supported.

response

Partially accepted

The use of the word 'should' does not alter the character of the Guidance Material. Finally the different Guidance Material will be combined.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(b)(3) –
Management – HAZARD IDENTIFICATION PROCESS**

p. 70

comment

1760

comment by: *Cologne/Bonn Airport*

(a) This is not covered by ICAO A 14 regulation; should be moved to GM

response

Noted

This AMC is based on the content of the safety management manual (Doc 9859). Moreover, the Agency considers that AMC is the appropriate level for such material.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.005(b)(3) –
Management – HAZARD IDENTIFICATION**

p. 71-73

comment

694

comment by: *Flughafen Düsseldorf GmbH*

Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und Plausibilität überprüft werden müssen. Zudem ist der Verweis auf das DOC 9859 irreführend, da hier teilweise vollkommen neue Aspekte beschrieben werden. Warum wird hier eine Erweiterung der bisherigen Regelungen bzw. Richtlinien vorgenommen?

response

Partially accepted

ICAO safety management manual (Doc 9859) contains acceptable material which is necessary for hazard identification. Reference to ICAO Doc 9859 has been removed from all relevant draft material.

comment	1074	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are two GM to ADR.OR.D.005(b)(3) which are two distinct pieces of GM and all apply. This is contrary to previous EASA drafting principles. Suggest merging the GM into a single GM.	
response	Accepted	
	These two Guidance Material will be merged.	
comment	2100	comment by: <i>HIA - Highlands and Islands Airports Limited</i>
	GM1-ADR.OR.D005 (b) (3) - In the UK this is covered by a separate document CAP 760 - Hazard Identification and Risk assessment	
response	Noted	

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM2-ADR.OR.D.005(b)(3) – Management – HAZARD IDENTIFICATION</p>	<p>p. 73-74</p>
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comment	695	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und Plausibilität überprüft werden müssen.	
response	Partially accepted	
	ICAO safety management manual (Doc 9859) contains acceptable material which is necessary for hazard identification. Reference to ICAO Doc 9859 has been removed.	
comment	1075	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are two GM to ADR.OR.D.005(b)(3) which are two distinct pieces of GM and all apply. This is contrary to previous EASA drafting principles. Suggest merging the GM into a single GM.	
response	<i>Accepted</i>	
	These two Guidance Material havebeen merged.	
comment	1708	comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i>
	Change (b) into (a) and (a) into (b) in order to maintain correspondence with AMC1-ADR.OR.D.005(b)(3) - Management HAZARD IDENTIFICATION PROCESS	
response	Accepted	
	The text has been modified accordingly.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(b)(4) – Management – SAFETY RISK ASSESSMENT AND MITIGATION	p. 74
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comment 534 comment by: Flughafen Düsseldorf GmbH

Die Forderungen bezüglich eines Safety Risk Assessment sind viel zu ungenau und lassen viel Raum für Interpretation. Welches Management Level sollte entscheiden, ob ein Sicherheitsrisiko tolerabel ist oder nicht? Vielleicht noch der betroffene Abteilungsleiter selbst? Auch die Auflistung dieser Bereiche oder Namen sollte nicht in diesem Detail im Flughafenhandbuch veröffentlicht werden. Gerade hier gibt es unterschiedliche Strukturen bei den Flughäfen, die auch so beibehalten werden sollten. An manchen wird die Entscheidung und Risikobewertung durch gemeinsamen Konsens erreicht, andere hingegen übernehmen die Aufgabe im Rahmen des SMS. Dies sollte auch künftig so bleiben, da durch die EASA Regelung ggf. eine Verschlechterung eintreten kann. Auch hier empfiehlt sich die Verschiebung dieses AMCs in das GM.

response Noted

The Agency considers that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation. It is for the aerodrome operator to decide the level of management that will have the authority to take decisions regarding tolerability of safety risks; this is also foreseen in Appendix 7 of ICAO Annex 14 under item 1.2.
The aerodrome manual being the key safety assurance document, is considered to be the appropriate means to contain the necessary information regarding personnel authority for tolerability of safety risks.

comment 696 comment by: Flughafen Düsseldorf GmbH

Die hier aus dem DOC 9859 entnommenen Passagen wurden allgemein eher als Leitfaden verstanden und bekommen durch die Verwendung im Regelwerk einen anderen Charakter. Die Inhalte sind teilweise weit von der derzeitigen betrieblichen Praxis bzw. dem Umsetzungsstand an Flughäfen entfernt. Zudem ist fraglich ob die uneingeschränkte und unkritische Übernahme sinnvoll ist.

response Noted

The text is based on item 1.2 of Appendix 7 of ICAO Annex 14 and the relevant ICAO Doc 9859. The Agency considers that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation.

comment 755 comment by: ADP : Aeroports de Paris

Référence: AMC1-ADR.OR.D.005(b)(4)	Management SAFETY RISK ASSESSMENT AND
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	MITIGATION
Proposition/commentaire	Nous avons du mal à comprendre cet AMC. Ce texte devrait être revu pour être suffisamment clair et qu'il en soit donné une interprétation précise.
Justification	
Traduction de courtoisie	We have some difficulties to understand this AMC. This text should be reviewed to be sufficiently clear and to be given a precise interpretation.

response

Noted

The text is based on item 1.2 of Appendix 7 of ICAO Annex 14 and the relevant ICAO Doc 9859. The Agency considers that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation.

comment

787

comment by: *Airport Nuremberg - NUE/EDDN*

This AMC leaves due to the vague wording and lack of details too much room for interpretation. It is not clear which management level should decide whether a safety risk is tolerable or not. Maybe even the concerned department or management level? This should, however, not be a part of the aerodrome manual! The aerodrome manual shall be accessible to all staff and therefore it could lead to the blame of the according listed persons after the occurrence of an accident or incident.

So far every airport has developed their own way of dealing with the assessment of safety risks due to the difference in structure and size of the organisation. At some the risk is evaluated by the chief executive officer, at others by the safety management or via a joint consensus. **This should be further possible after the EASA legislation and therefore this AMC should be moved to the guidance material! Neither national legislation nor the ICAO Annex 14 demand that!**

response

Noted

The Agency considers that this AMC, in conjunction with the relevant Guidance Material adequately address the issue of safety risk assessment and mitigation. It is for the aerodrome operator to decide the level of management that will have the authority to take decisions regarding tolerability of safety risks; this is also foreseen in Appendix 7 of ICAO Annex 14 under item 1.2.

The aerodrome manual being the key safety assurance document, is considered to be the appropriate means to contain the necessary information regarding personnel authority for tolerability of safety risks. Aerodrome operators are expected to establish and implement a non-blame culture.

comment	<p>891 comment by: <i>Union des Aéroports français - UAF</i></p> <p>Attachment #106</p> <p>UAF NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(4)</p> <p>Référence: AMC1-ADR.OR.D.005(b)(4) Management SAFETY RISK ASSESSMENT AND MITIGATION</p> <p>Traduction de courtoisie We have some difficulties to understand this AMC. This text should be reviewed to be sufficiently clear and to be given a precise interpretation.</p>
response	<p>Noted</p> <p>The text is based on item 1.2 of Appendix 7 of ICAO Annex 14 and the relevant ICAO Doc 9859. The Agency believes that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation.</p>
comment	<p>1287 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #107</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(4)</p> <p>Référence: AMC1-ADR.OR.D.005(b)(4) Management SAFETY RISK ASSESSMENT AND MITIGATION</p> <p>Traduction de courtoisie We have some difficulties to understand this AMC. This text should be reviewed to be sufficiently clear and to be given a precise interpretation.</p>
response	<p>Noted</p> <p>The text is based on item 1.2 of Appendix 7 of ICAO Annex 14 and the relevant ICAO Doc 9859. The Agency considers that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation.</p>
comment	<p>1535 comment by: <i>Flughafen Graz Betriebs GmbH</i></p> <p>Auch bei den Forderungen bezüglich des Safety Risk Assessment ist keine Genauigkeit und viel Raum für Interpretation gegeben. Welches Management Level sollte entscheiden, ob ein Sicherheitsrisiko tolerabel ist oder nicht? Vielleicht noch der betroffene Abteilungsleiter selbst? Auch die Auflistung dieser Bereiche oder Namen sollte nicht in diesem Detail im Flughafenhandbuch veröffentlicht werden. Gerade hier gibt es unterschiedliche Strukturen bei den Flughäfen, die auch so beibehalten werden sollten. An manchen wird die Entscheidung und Risikobewertung</p>

response This text should be reviewed to be sufficiently clear and to be given a precise interpretation.

Noted

The text is based on item 1.2 of Appendix 7 of ICAO Annex 14 and the relevant ICAO Doc 9859. The Agency considers that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation.

comment 1937 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#109](#)

ADBM - NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(4)

Référence: AMC1-ADR.OR.D.005(b)(4)
Management
SAFETY RISK ASSESSMENT AND MITIGATION

Traduction de courtoisie
We have some difficulties to understand this AMC.
This text should be reviewed to be sufficiently clear and to be given a precise interpretation.

response *Noted*

The text is based on item 1.2 of Appendix 7 of ICAO Annex 14 and the relevant ICAO Doc 9859. The Agency considers that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation.

comment 2353 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC1-ADR.OR.D.005(b)(4)	Management SAFETY RISK ASSESSMENT AND MITIGATION
Proposition/commentaire	Nous avons du mal à comprendre cet AMC. Ce texte devrait être revu pour être suffisamment clair et qu'il en soit donné une interprétation précise.
Justification	
Traduction de courtoisie	We have some difficulties to understand this AMC. This text should be reviewed to be sufficiently clear and to be given a precise interpretation.

response

Noted

The text is based on item 1.2 of Appendix 7 of ICAO Annex 14 and the relevant ICAO Doc 9859. The Agency considers that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation.

comment

2522

comment by: *ADV -German Airports Association*

AMC1-ADR.OR.D.005(b)(4) – Management

SAFETY RISK ASSESSMENT AND MITIGATION

(a) A formal safety risk assessment and mitigation process should be developed and maintained that ensures analysis (in terms of probability and severity of occurrence), assessment (in terms of tolerability) and control (in terms of mitigation) of risks.

(b) The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (a) above, should be specified in the aerodrome manual.

Further guidance on safety risk assessment mitigation is contained in ICAO Doc 9859.

Auch bei den Forderungen bezüglich des Safety Risk Assessment ist keine Genauigkeit und viel Raum für Interpretation gegeben. Welches Management Level sollte entscheiden, ob ein Sicherheitsrisiko tolerabel ist oder nicht? Vielleicht noch der betroffene Abteilungsleiter selbst? Auch die Auflistung dieser Bereiche oder Namen sollte nicht in diesem Detail im Flughafenhandbuch veröffentlicht werden. Gerade hier gibt es unterschiedliche Strukturen bei den Flughäfen, die auch so beibehalten werden sollten. An manchen wird die Entscheidung und Risikobewertung durch gemeinsamen Konsens erreicht, andere hingegen übernehmen die Aufgabe im Rahmen des SMS. Dies sollte auch künftig so bleiben, da durch die EASA Regelung ggf. eine Verschlechterung eintreten kann. ♦ Auch hier empfiehlt sich die Verschiebung in das GM.

response

Noted

The Agency considers that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation. It is for the aerodrome operator to decide the level of management that will have the authority to take decisions regarding tolerability of safety risks; this is also foreseen in Appendix 7 of ICAO Annex 14 under item 1.2.

The aerodrome manual being the key safety assurance document, is considered to be the appropriate means to contain the necessary information regarding personnel authority for tolerability of safety risks.

comment

2553

comment by: *MST / STR - Stuttgart Airport*

AMC1-ADR.OR.D.005(b)(4) – Management

SAFETY RISK ASSESSMENT AND MITIGATION

(a) A formal safety risk assessment and mitigation process should be developed and maintained that ensures analysis (in terms of probability and severity of occurrence), assessment (in terms of tolerability) and

control (in terms of mitigation) of risks.
(b) The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (a) above, should be specified in the aerodrome manual.
Further guidance on safety risk assessment mitigation is contained in ICAO Doc 9859.

Auch bei den Forderungen bezüglich des Safety Risk Assessment ist keine Genauigkeit und viel Raum für Interpretation gegeben. Welches Management Level sollte entscheiden, ob ein Sicherheitsrisiko tolerabel ist oder nicht? Vielleicht noch der betroffene Abteilungsleiter selbst? Auch die Auflistung dieser Bereiche oder Namen sollte nicht in diesem Detail im Flughafenhandbuch veröffentlicht werden. Gerade hier gibt es unterschiedliche Strukturen bei den Flughäfen, die auch so beibehalten werden sollten. An manchen wird die Entscheidung und Risikobewertung durch gemeinsamen Konsens erreicht, andere hingegen übernehmen die Aufgabe im Rahmen des SMS. Dies sollte auch künftig so bleiben, da durch die EASA Regelung ggf. eine Verschlechterung eintreten kann. → Auch hier empfiehlt sich die Verschiebung in das GM.

response

Noted

The Agency considers that this AMC, in conjunction with the relevant Guidance Material, adequately address the issue of safety risk assessment and mitigation. It is for the aerodrome operator to decide the level of management that will have the authority to take decisions regarding tolerability of safety risks; this is also foreseen in Appendix 7 of ICAO Annex 14 under item 1.2.

The aerodrome manual being the key safety assurance document, is considered to be the appropriate means to contain the necessary information regarding personnel authority for tolerability of safety risks.

comment

2620

comment by: *ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen*

AMC1-ADR.OR.D.005(b)(4) – Management
SAFETY RISK ASSESSMENT AND MITIGATION

Auch bei den Forderungen bezüglich des Safety Risk Assessment ist keine Genauigkeit und viel Raum für Interpretation gegeben. Welches Management Level sollte entscheiden, ob ein Sicherheitsrisiko tolerabel ist oder nicht? Vielleicht noch der betroffene Abteilungsleiter selbst? Auch die Auflistung dieser Bereiche oder Namen sollte nicht in diesem Detail im Flughafenhandbuch veröffentlicht werden. Gerade hier gibt es unterschiedliche Strukturen bei den Flughäfen, die auch so beibehalten werden sollten. An manchen wird die Entscheidung und Risikobewertung durch gemeinsamen Konsens erreicht, andere hingegen übernehmen die Aufgabe im Rahmen des SMS. Dies sollte auch künftig so bleiben, da durch die EASA Regelung ggf. eine Verschlechterung eintreten kann. → Auch hier empfiehlt sich die Verschiebung in das GM.

response

Noted

The Agency considers that this AMC, in conjunction with the relevant

Guidance Material, adequately address the issue of safety risk assessment and mitigation. It is for the aerodrome operator to decide the level of management that will have the authority to take decisions regarding tolerability of safety risks; this is also foreseen in Appendix 7 of ICAO Annex 14 under item 1.2.

The aerodrome manual being the key safety assurance document, is considered to be the appropriate means to contain the necessary information regarding personnel authority for tolerability of safety risks.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.005(b)(4) –
Management – SAFETY RISK ASSESSMENT AND MITIGATION**

p. 74

comment 697 comment by: *Flughafen Düsseldorf GmbH*

Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und Plausibilität überprüft werden müssen.

response Partially accepted

The Guidance Material are fully in line with the concept of safety risk management contained in the relevant ICAO documentation. Reference to ICAO doc 9859 has been removed.

comment 1076 comment by: *NATS National Air Traffic Services Limited*

There are two GM1 to ADR.OR.D.005(b)(4). Suggest renumbering one of them.

response Accepted

The numbering of all relevant material have been reviewed and amended as necessary.

comment 1719 comment by: *ENAC Ente Nazionale per l'Aviazione Civile*

Rename the GM1-ADR.OR.D.005(b)(4) – Management as GM2

response Accepted

The numbering of all relevant material have been reviewed and amended as necessary.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.005 (b)(4) –
Management – SAFETY ASSESSMENT FOR RISK MANAGEMENT**

p. 74-87

comment 243 comment by: *Brussels Airport - BRU/EBBR*

Table 1 (page 79) gives some examples on the Severity Class.

	<p>Under D Minor the first example mentioned is : hard braking during landing or taxiing. In my opinion there is a big difference between a hard braking during landing and a hard braking during taxiing. The severity class of a hard braking during taxiing should be lower than the severity class of a hard braking during landing, the latter quite similar to a hard braking during an aborted take-off. Therefore I suggest to mention: 1. under Severity Class D Minor as example : hard braking during taxiing 2. under Severity Class C Major as example : hard braking during landing or during aborted take-off.</p>
response	<p>Noted</p> <p>The Agency has reviewed and removed the relevant Guidance Material.</p>
comment	<p>308 comment by: <i>Danish Transport Authority</i></p> <p>(b)(4) - (b) (2) EDITORIAL: Harmonize the term Air Navigation Service Providers throughout the documents. The used definition "ground service providers" should be "ground handling service providers". The Apron Mangement service should also be included.</p>
response	<p>Noted</p> <p>The Agency has reviewed and removed the relevant Guidance Material.</p>
comment	<p>336 comment by: <i>Brussels Airport - BRU/EBBR</i></p> <p>ADR.OR.D.005 & GM-ADR.OR.D.005</p> <p>Support to this text & the Guidance Material provided.</p> <p>But with my remark previously sent on "hard braking".</p> <p>Question : As for safety management systems, most is based on ICAO DOC9859, but is the contents of the future Annex 19 on SMS being considered as well (in case, this might differ substantially with Doc9859) ?</p>
response	<p>Noted</p> <p>The Agency has reviewed and removed this Guidance Material. The Agency is following the relevant ICAO work on development of Annex 19.</p>
comment	<p>341 comment by: <i>Avinor</i></p> <p>GM1-ADR.OR.D.005 (b)(4). Avinor suggest an ammendment to sentence nr. 3, it could read as follows: "Safety risk decision making and acceptance should be specified through a risk tolerability matrix, or other ways to verify safety acceptance criteria". Avinor suggest that other ways to varify safety acceptability than through a risk tolerability matrix is mentioned. Reference is made to paragraph 4 (iii) (A-D). We suggest an</p>

response	<p>ammendment to sentence nr. 3, it should read as follows: "Safety risk decision making and acceptance should be specified through a risk tolerability matrix, or other ways to verify safety acceptance criteria".</p> <p><i>Noted</i></p> <p>The Agency has reviewed and removed the relevant Guidance Material.</p>
comment	<p>698 comment by: <i>Flughafen Düsseldorf GmbH</i></p> <p>c) 1) Warum taucht an dieser Stelle der Begriff "Safety Manager" auf? Er muss bereits vorher genannt und definiert werden!</p> <p>Es muss noch deutlicher herausgestellt werden, dass der safety manager nicht die safety assessments selbst durchführt, um Mißverständnisse zu vermeiden und die Verantwortungen klar zu regeln.</p>
response	<p><i>Noted</i></p> <p>The Agency believes that the responsibilities of the Safety Manager are adequately defined, especially in ADR.OR.D.015 and the related means of compliance.</p>
comment	<p>839 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• ANNEX II — Part-OR — ADR.OR.B.040 — Changes (p41-42)• Annex I – Part AR – ADR-AR.C.040 (a) – Changes (p26)• AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.D.005 (b)(4) — Management - safety assessment for risk management (p74-87)• AMC/GM to ANNEX II — Part-OPS –AMC2-ADR-OPS-B.070 — Runway pavement overlays (p163)• AMC/GM to ANNEX II — Part-OPS – AMC3-ADR-OPS.B.070 — Marking and lighting of Unserviceable areas (p163)• AMC/GM to ANNEX II — Part-OPS – AMC-ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects (p173)• AMC/GM to ANNEX II — Part-OPS – AMC-ADR-OPS.C.015 — Visual Aids and Electrical Systems (p176) <p><u>2. Justification and proposed text / comment</u></p> <p>This comment is linked with comment 1087 in book I. Referencing to the Certification specifications in Book I and Book II is not relevant because CS are referring to essential requirements and are applicable only through the certification basis of the aerodrome which includes: the CS applicable to the given aerodrome, and ELOS and SC where appropriate. This is already taken into account in AMC1-ADR.AR.C.035(f) — Issuance of certificate – paragraph (b) – page 29 : "<i>prescribed in the certification specifications included in the certification basis of the aerodrome</i>" DGAC thus proposes to adopt the same writing in the following modifications for the provisions of Book I and II that refer to CS, and add the amendment of the certification basis, following a change implying new CS which are applicable, in ADR-AR.C.040 (a) :</p> <p>ADR-AR.C.040 (a) – Changes</p>

"(a) [...] (4) the corresponding amended certification basis, if relevant.
[...]"

GM1-ADR.OR.D.005 (b)(4) – Management

"SAFETY ASSESSMENT FOR RISK MANAGEMENT

...

(d) Necessity for conducting a safety assessment

(1) A safety assessment is carried out for all safety concerns, including; identified safety hazards, deviations from requirements or certification specifications or certification basis or and identified change or for any other items or circumstances where such an assessment is considered a contribution to safety assurance. A safety assessment is an everyday process at an aerodrome with a functioning management system. It may be applied in different scale depending on the safety concern to be assessed. The list below is not exhaustive but identifies some of the main reasons for a safety assessment to be applied.

..."

AMC2-ADR-OPS-B.070 - Runway pavement overlays

"The aerodrome operator should ensure that:

(a) When a runway is to be returned temporarily to an operational status before resurfacing is complete, the temporary ramp should comply with the applicable specifications included in the aerodrome certification basis of the aerodrome CSs;

(b) Before a runway being overlaid is returned to a temporary operational status, a runway centre line marking conforming to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs should be provided;

(c) The location of any temporary threshold should conform to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC3-ADR-OPS.B.070 – Marking and lighting of Unserviceable areas

Note: the word "shall" is inappropriately used in this AMC and is to be replaced by "should".

"(a) The aerodrome operator should ensure that:

(1) Unserviceability markers are displayed whenever any portion of a taxiway, apron or holding bay is unfit for the movement of aircraft but it is still possible for aircraft to bypass the area safely;

(2) On a movement area used at night, unserviceability lights should be used;

(3) Unserviceability markers and lights are placed at intervals sufficiently close so as to delineate the unserviceable area.

(b) Unserviceability markers shall should consist of conspicuous upstanding devices such as flags, cones or marker boards;

(c) Unserviceability markers and lights should meet the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC-ADR-OPS.B.080 – Marking and lighting of vehicles and other mobile objects

"...

(c) When flags are used to mark mobile objects, they should comply with the applicable specifications included in the aerodrome certification basis

of the aerodrome CSs;
..."

AMC-ADR-OPS.C.015 – Visual Aids and Electrical Systems

Note: the word "shall" is inappropriately used in this AMC, in paragraph (a), and is to be replaced by "should".

"(a) The aerodrome operator should establish a system of corrective and preventive maintenance which ensures that a light is deemed unserviceable when the main beam average intensity is less than 50 % of the value specified in the applicable specifications included in the aerodrome certification basis of the aerodrome CSs. For light units where the designed main beam average intensity is above the specified in the applicable specifications included in the aerodrome certification basis of the aerodrome CSs, the 50 % value shall should be related to that design value;
..."

response

Noted

The Agency has reviewed and removed the relevant Guidance Material.

comment

1077

comment by: NATS National Air Traffic Services Limited

There are two GM1 to ADR.OR.D.005(b)(4). Suggest renumbering one of them.

response

Noted

The Agency has reviewed and removed the relevant Guidance Material.

comment

1268

comment by: Zürich Airport

Page 78-79: Paragraph (iv) Risk Assessment within (4) Risk assesment overview should be moved in (v).

response

Noted

The Agency has reviewed and removed the relevant Guidance Material.

comment

1269

comment by: Zürich Airport

Relating to table 1: The Example "mid-air collision between aircraft" isn't applicable for airports.

response

Noted

The Agency has reviewed and removed the relevant Guidance Material.

comment

1436

comment by: Swedish Transport Agency

5 iii (B): delete AIP and NOTAM and replace with IAIP which includes AIC.

response

Noted

The Agency has reviewed and removed the relevant Guidance Material.

comment	<p>1517 comment by: <i>ECA - European Cockpit Association</i></p> <p>Comment on (b)(4) and (e)(1)(iv): Involved parties should not only contain pilots but rather state clearly pilots of local pilots' associations.</p> <p>Justification: Pilots' associations can often give a much wider view than airline (management) pilots of a single airline.</p>
response	<p>Noted</p> <p>The Agency has reviewed and removed the relevant Guidance Material.</p>
comment	<p>1522 comment by: <i>Geneva International Airport (ROMIG)</i></p> <p>Move the flow chart to the end of the section. Add a title or reference for each of the three phases shown in the Flowchart Part 1. Clarification of the diagram and logic in placement of the flowchart.</p>
response	<p>Noted</p> <p>The Agency has reviewed and removed the relevant Guidance Material.</p>
comment	<p>1731 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i></p> <p>Change GM1-ADR.OR.D.005(b)(4) in GM2-ADR.OR.D.005(b)(4)</p>
response	<p>Noted</p> <p>The Agency has reviewed and removed the relevant Guidance Material.</p>
comment	<p>2166 comment by: <i>ECA - European Cockpit Association</i></p> <p>Comment (e)(5)(i)(C)(c) page 83, change as follows: (c) Low priority: The hazard shall be further monitored. <u>Risk mitigation should be applied as necessary.</u></p> <p>Justification: If it is feasible even a minor hazard should be mitigated if possible with reasonable effort.</p>
response	<p>Noted</p> <p>The Agency has reviewed and removed the relevant Guidance Material.</p>
comment	<p>2221 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Move the flow chart to the end of the section. Add a title or reference for each of the three phases shown in the Flowchart Part 1.</p>
response	<p>Noted</p> <p>The Agency has reviewed and removed the relevant Guidance Material.</p>

comment	2224	comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i>
	suggestion for table 1: The Example "mid-air collision between aircraft" does not really apply to airports.	
response	Noted The Agency has reviewed and removed the relevant Guidance Material.	
comment	2449	comment by: <i>Isavia</i>
	GM1-ADR.OR.D.005 (b)(4). Isavia suggest an amendment to sentence nr. 3, it could read as follows: "Safety risk decision making and acceptance should be specified through a risk tolerability matrix, or other ways to verify safety acceptance criteria". Isavia suggest that other ways to verify safety acceptability than through a risk tolerability matrix is mentioned. Reference is made to paragraph 4 (iii) (A-D). We suggest an amendment to sentence nr. 3, it should read as follows: "Safety risk decision making and acceptance should be specified through a risk tolerability matrix, or other ways to verify safety acceptance criteria".	
response	Noted The Agency has reviewed and removed the relevant Guidance Material.	
comment	2636	comment by: <i>Fraport AG</i>
	GM1-ADR.OR.D.005(b)(4) — Management (e)(4)(iv)(E) and (F) SAFETY ASSESSMENT FOR RISK MANAGEMENT	
	Editorial	
	Table 2	
	Should be adapted to the established statistical key indicators occurrences / movements.	
	Fraport AG Occurrences / movements is common use at EASA Annual Report 2010	
response	Noted The Agency has reviewed and removed the relevant Guidance Material.	
comment	2637	comment by: <i>Fraport AG</i>
	GM1-ADR.OR.D.005 (b)(4) — Management (e)(4)(iv)(F) SAFETY ASSESSMENT FOR RISK MANAGEMENT	
	Editorial	
	Complete paragraph	
	Should be adapted to the established statistical key indicators occurrences / movements.	

	Fraport Occurrences / movements is common use at EASA Annual Report 2010	AG
response	Noted The Agency has reviewed and removed the relevant Guidance Material.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(b)(5) – Management – SAFETY PERFORMANCE MONITORING AND MEASUREMENT	p. 87
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comment	535	comment by: <i>Flughafen Düsseldorf GmbH</i>
	<p>Bisher ist ein Safety Performance Monitoring noch nirgends gefordert, da dies nicht praktiziert wird und es auch bis Dato keine Richtwerte gibt ist fraglich, wie eine genaue Durchführung erfolgen soll.</p> <p>Die Überprüfung stellt allein eine Unverhältnismäßigkeit dar, weil man nur prüfen kann, was man vorher aufwändig überwacht und erfasst. Was soll als Safety Performance Indikator zulässig und vergleichbar sein? Auch die Durchführung von Safety-Studien und Safety-Umfragen stellt die Flughäfen vor Probleme. Wie und wo sollten diese durchgeführt werden? Hier ist mit einem vernünftigen Reporting System ohnehin schon die Möglichkeit gegeben, safety-kritische Vorkommnisse zu melden. Wozu noch diffizile Studien und Umfragen, die Personal, Zeit und finanzielle Mittel binden (bei kleineren Airports auch kaum praktikabel sein dürften) mit einem mehr als fragwürdigen Ergebnis? Eine Umfrage hat keinen Einfluss auf die Verbesserung der Betriebssicherheit, die Nachbereitung von Vorkommnissen und Schäden schon. Der Fokus sollte eindeutig auf der Überwachung der Prozesse liegen, nicht auf der Effizienz des SMS selbst!</p> <p>Im ICAO SMM werden Schadensraten und Flugzeugabstürze als performance indicators genannt. Hier hat das SMS keinen unmittelbaren Einfluss, wäre aber hier in der Bringschuld.</p> <p>Diese Inhalte sollten, wenn überhaupt, nur im GM dokumentiert werden!!!</p>	
response	Partially accepted Performance monitoring of an aerodrome’s safety management system is vital for establishing a clear picture of its functioning, while it is an inseparable part of the safety management system itself. Safety indicators and targets should be agreed with the competent authority. The text has been amended by turning most of paragraph (b) of the AMC into Guidance Material.	

comment	791	comment by: <i>Airport Nuremberg - NUE/EDDN</i>
	Up to date a safety performance monitoring is not demanded. Neither in national legislation nor in the ICAO requirements. Therefore there are no	

guidance values or benchmarks available. This further leads the implementation of safety performance monitoring to question. What could be reliable safety performance indicator? The ICAO Safety Management Manual lists the amount of damages at the airport or the number of airplane accidents. It has to be mentioned that those indicators are not directly and collectively in the responsibility of the aerodrome (more likely the airline in the case of an aircraft accident). This AMC must be turned into guidance material to prevent additional cost and effort on the side of the aerodrome while generating a doubtful, maybe even useless output.

Altogether does monitoring and measuring of the safety performance constitute to a disproportion, because it requires the complex and expensive documentation and control of the safety management, leading to an extremely doubtful result. Also the conduction of safety- surveys and safety-studies eventually leads the aerodromes to problems. How and where should safety-surveys be conducted? It would be much more efficient and beneficial to the ideal of safety to have a functioning reporting system to give staff the opportunity to report safety-critical occurrences. Safety studies and surveys are very cost, time and staff-intensive while generating zero additional benefit! No Aerodrome should be forced to conduct studies and surveys! This places an enormous burden on small and medium sized airports and therefore should be **moved to the guidance material!**

A survey has no effect on the improvement of safety, whereas the post-processing of damages and accidents does. The focus should definitely be on the monitoring of the safety relevant processes at the aerodrome and not the safety management itself!

response Partially accepted

Performance monitoring of an aerodrome's safety management system is vital for establishing a clear picture of its functioning, while it is an inseparable part of the safety management system itself. Safety indicators and targets should be agreed with the competent authority. The text has been amended by turning most of paragraph (b) of the AMC into Guidance Material.

comment 1295 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX II - Part-OR – AMC1-ADR.OR.D.005(b)(5) – Management (p87)
- AMC/GM to ANNEX II - Part-OR – AMC1-ADR.OR.D.005(b)(8) – Management (p90)

2. Justification and proposed text / comment

Previous experience of SMS implementation in France has shown that safety audits cannot be performed in small structures. Moreover, small organizations will probably have difficulties to implement the full scope of AMC1-ADR.OR.D.005(b)(8) on training.

That's why it is essential, as specified in the Basic regulation 216-2008 - article 8a - paragraph 6, that the measures "shall be proportionate to the size, traffic, category and complexity of the aerodrome and nature and volume of operations thereon".

Thus DGAC proposes to add the content of GM1-ADR.OR.D.015(b) in these provisions "as appropriate depending on the size of the organisation and the type and complexity of operations" (see below).

It is by the way suggested to define "safety performance indicators" and "safety performance targets".

AMC1-ADR.OR.D. 005(b)(5) – Management

"SAFETY PERFORMANCE MONITORING AND MEASUREMENT

[...]

(b) This process should include, as appropriate depending on the size of the organisation and the type and complexity of operations:

[...]"

AMC1-ADR.OR.D.005(b)(8) – Management

"TRAINING

(a) The aerodrome operator should establish a safety training programme to all staff, regardless of their level in the organisation, as appropriate depending on the size of the organisation and the type and complexity of operations.

(b) The safety training programme should consist of the following, as appropriate depending on the size of the organisation and the type and complexity of operations:

(1) a documented process to identify training requirements for each area of activity within the aerodrome organisation, and track completion of required training;

(2) a validation process that measures the effectiveness of training;

(3) initial job-specific training;

(4) induction/initial training incorporating safety management system, including Human Factors and organisational factors; and

(5) recurrent safety training.

(c) A training file should be developed for each employee, as appropriate depending on the size of the organisation and the type and complexity of operations, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training.

(d) The aerodrome operator should specify initial and recurrent safety training standards for operational personnel, managers and supervisors, senior managers and the accountable manager, as appropriate depending on the size of the organisation and the type and complexity of operations. The amount and level of detail of safety training should be appropriate to the individual's responsibility and involvement in the SMS.

(e) The aerodrome operator should specify safety training responsibilities, including contents, frequency, validation and safety training records management.

(f) The information provided in points (d) and (e) above should be included in the aerodrome manual.

This training programme may be combined with the training programme provided for in AMC1- ADR.OR.D.015 (h)."

response

Partially accepted

The Agency does not agree that there is a need to define the term 'safety performance indicator' or 'safety performance target', as they are widely

used terms. However, the text of the AMC has been amended by turning most of paragraph (b) into Guidance Material.

comment

1538

comment by: *Flughafen Graz Betriebs GmbH*

Bisher ist ein Safety Performance Monitoring noch nirgends gefordert, da dies nicht praktiziert wird und es auch bis Dato keine Richtwerte gibt ist fraglich, wie eine genaue Durchführung erfolgen soll.

Die Überprüfung stellt allein eine Unverhältnismäßigkeit dar, weil man nur prüfen kann, was man vorher aufwändig überwacht und erfasst. Was soll als Safety Performance Indikator zulässig und vergleichbar sein?

Auch die Durchführung von Safety-Studien und Safety-Umfragen stellt die Flughäfen vor Probleme. Wie und wo sollten diese durchgeführt werden? Hier ist mit einem vernünftigen Reporting System ohnehin schon die Möglichkeit gegeben, safety-kritische Vorkommnisse zu melden. Wozu noch diffizile Studien und Umfragen, die Personal, Zeit und finanzielle Mittel binden (bei kleineren Airports auch kaum praktikabel sein dürften) mit einem mehr als fragwürdigen Ergebnis. Eine Umfrage hat keinen Einfluss auf die Verbesserung der Betriebssicherheit, die Nachbereitung von Vorkommnissen und Schäden schon. Der Fokus sollte eindeutig auf der Überwachung der Prozesse liegen, nicht auf der Effizienz des SMS selbst!

Im ICAO SMM werden Schadensraten und Flugzeugabstürze als performance indicators genannt. Hier hat das SMS keinen unmittelbaren Einfluss, ist aber in der Bringschuld → Allerhöchstens im GM!

response

Partially accepted

Performance monitoring of an aerodrome's safety management system is vital for establishing a clear picture of its functioning, while it is an inseparable part of the safety management system itself. Safety indicators and targets should be agreed with the competent authority.

The text has been amended by turning most of paragraph (b) of the AMC into Guidance Material.

comment

1762

comment by: *Cologne/Bonn Airport*

(b): (1) to (7) should be moved to GM

response

Partially accepted

Performance monitoring of an aerodrome's safety management system is vital for establishing a clear picture of its functioning, while it is an inseparable part of the safety management system itself. Safety indicators and targets should be agreed with the competent authority.

The text has been amended by turning most of paragraph (b) of the AMC into Guidance Material.

comment

2061

comment by: *AENA - Aeropuertos Españoles y Navegación Aérea*

Previous experience of SMS implementation has shown that safety audits cannot be performed in small structures.

Moreover, small organizations will probably have difficulties to implement the full scope of AMC1-ADR.OR.D.005(b)(8) on training.

That's why it is essential, as specified in the Basic regulation 216-2008 - article 8a - paragraph 6, that the measures "shall be proportionate to the size, traffic, category and complexity of the aerodrome and nature and volume of operations thereon".

Thus it is proposed to add the content of GM1-ADR.OR.D.015(b) in these provisions "as appropriate depending on the size of the organisation and the type and complexity of operations" (see below).

It is by the way suggested to define "safety performance indicators" and "safety performance targets".

AMC1-ADR.OR.D. 005(b)(5) – Management

"SAFETY PERFORMANCE MONITORING AND MEASUREMENT

[...]

(b) This process should include, as appropriate depending on the size of the organisation and the type and complexity of operations:

[...]"

response

Partially accepted

The Agency does not agree that there is a need to define the term 'safety performance indicator' or 'safety performance target', as they are widely used terms. However, the text of the AMC has been amended by turning most of paragraph (b) into Guidance Material.

comment

2523

comment by: ADV -German Airports Association

AMC1-ADR.OR.D.005(b)(5) – Management

SAFETY PERFORMANCE MONITORING AND MEASUREMENT

(a) Safety performance monitoring and measurement should be the process by which the safety performance of the operator is verified in comparison to the safety policy and objectives, identified safety risks and the mitigation measures.

(b) This process should include:

(1) safety reporting;

(2) safety studies, which are rather large analyses encompassing broad safety concerns;

(3) safety reviews including trends reviews, which are conducted during introduction and deployment of new technologies, change or implementation of procedures, or in situations of structural change in operations, or to explore increase in incidents or safety reports;

(4) safety audits which focus in the integrity of the operator's management system, and periodically assess the status of safety risk controls;

(5) safety surveys, which examine particular elements or procedures of a specific operation, such as problem areas or bottlenecks in daily operations, perceptions and opinions of operational personnel and areas of dissent or confusion;

(6) internal safety investigations, whose scope should extend the scope of occurrences required to be reported to the competent authority; an
(7) setting safety performance indicators and measuring performance against them.

Bisher ist ein Safety Performance Monitoring noch nirgends gefordert, da dies nicht praktiziert wird und es auch bis Dato keine Richtwerte gibt ist fraglich, wie eine genaue Durchführung erfolgen soll.

Die Überprüfung stellt allein eine Unverhältnismäßigkeit dar, weil man nur prüfen kann, was man vorher aufwändig überwacht und erfasst. Was soll als Safety Performance Indikator zulässig und vergleichbar sein?

Auch die Durchführung von Safety-Studien und Safety-Umfragen stellt die Flughäfen vor Probleme. Wie und wo sollten diese durchgeführt werden? Hier ist mit einem vernünftigen Reporting System ohnehin schon die Möglichkeit gegeben, safety-kritische Vorkommnisse zu melden. Wozu noch diffizile Studien und Umfragen, die Personal, Zeit und finanzielle Mittel binden (bei kleineren Airports auch kaum praktikabel sein dürften) mit einem mehr als fragwürdigen Ergebnis. Eine Umfrage hat keinen Einfluss auf die Verbesserung der Betriebssicherheit, die Nachbereitung von Vorkommnissen und Schäden schon. Der Fokus sollte eindeutig auf der Überwachung der Prozesse liegen, nicht auf der Effizienz des SMS selbst!

Im ICAO SMM werden Schadensraten und Flugzeugabstürze als performance indicators genannt. Hier hat das SMS keinen unmittelbaren Einfluss, ist aber in der Bringschuld ◊ Allerhöchstens im GM!

response

Partially accepted

Performance monitoring of an aerodrome's safety management system is vital for establishing a clear picture of its functioning, while it is an inseparable part of the safety management system itself. Safety indicators and targets should be agreed with the competent authority.

The text has been amended by turning most of paragraph (b) of the AMC into Guidance Material.

comment

2621

comment by: *ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen*

AMC1-ADR.OR.D.005(b)(5) – Management

SAFETY PERFORMANCE MONITORING AND MEASUREMENT

Bisher ist ein Safety Performance Monitoring noch nirgends gefordert, da dies nicht praktiziert wird und es auch bis Dato keine Richtwerte gibt ist fraglich, wie eine genaue Durchführung erfolgen soll.

Die Überprüfung stellt allein eine Unverhältnismäßigkeit dar, weil man nur prüfen kann, was man vorher aufwändig überwacht und erfasst. Was soll als Safety Performance Indikator zulässig und vergleichbar sein?

Auch die Durchführung von Safety-Studien und Safety-Umfragen stellt die Flughäfen vor Probleme. Wie und wo sollten diese durchgeführt werden? Hier ist mit einem vernünftigen Reporting System ohnehin schon die Möglichkeit gegeben, safety-kritische Vorkommnisse zu melden. Wozu noch diffizile Studien und Umfragen, die Personal, Zeit und finanzielle Mittel binden (bei kleineren Airports auch kaum praktikabel sein dürften) mit einem mehr als fragwürdigen Ergebnis. Eine Umfrage hat keinen

response

Einfluss auf die Verbesserung der Betriebssicherheit, die Nachbereitung von Vorkommnissen und Schäden schon. Der Fokus sollte eindeutig auf der Überwachung der Prozesse liegen, nicht auf der Effizienz des SMS selbst!

Im ICAO SMM werden Schadensraten und Flugzeugabstürze als performance indicators genannt. Hier hat das SMS keinen unmittelbaren Einfluss, ist aber in der Bringschuld à Allerhöchstens im GM!

Partially accepted

Performance monitoring of an aerodrome's safety management system is vital for establishing a clear picture of its functioning, while it is an inseparable part of the safety management system itself. Safety indicators and targets should be agreed with the competent authority.
The text has been amended by turning most of paragraph (b) of the AMC into Guidance Material.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.005(b)(5) –
Management – SAFETY PERFORMANCE MONITORING AND
MEASUREMENT**

p. 87-88

comment

2554

comment by: MST / STR - Stuttgart Airport

AMC1-ADR.OR.D.005(b)(5) – Management

SAFETY PERFORMANCE MONITORING AND MEASUREMENT

(a) Safety performance monitoring and measurement should be the process by which the safety performance of the operator is verified in comparison to the safety policy and objectives, identified safety risks and the mitigation measures.

(b) This process should include:

(1) safety reporting;

(2) safety studies, which are rather large analyses encompassing broad safety concerns;

(3) safety reviews including trends reviews, which are conducted during introduction and deployment of new technologies, change or implementation of procedures, or in situations of structural change in operations, or to explore increase in incidents or safety reports;

(4) safety audits which focus in the integrity of the operator's management system, and periodically assess the status of safety risk controls;

(5) safety surveys, which examine particular elements or procedures of a specific operation, such as problem areas or bottlenecks in daily operations, perceptions and opinions of operational personnel and areas of dissent or confusion;

(6) internal safety investigations, whose scope should extend the scope of occurrences required to be reported to the competent authority; an

(7) setting safety performance indicators and measuring performance against them.

Bisher ist ein Safety Performance Monitoring noch nirgends gefordert, da dies nicht praktiziert wird und es auch bis Dato keine

Richtwerte gibt ist fraglich, wie eine genaue Durchführung erfolgen soll. Die Überprüfung stellt allein eine Unverhältnismäßigkeit dar, weil man nur prüfen kann, was man vorher aufwändig überwacht und erfasst. Was soll als Safety Performance Indikator zulässig und vergleichbar sein? Auch die Durchführung von Safety-Studien und Safety-Umfragen stellt die Flughäfen vor Probleme. Wie und wo sollten diese durchgeführt werden? Hier ist mit einem vernünftigen Reporting System ohnehin schon die Möglichkeit gegeben, safety-kritische Vorkommnisse zu melden. Wozu noch diffizile Studien und Umfragen, die Personal, Zeit und finanzielle Mittel binden (bei kleineren Airports auch kaum praktikabel sein dürften) mit einem mehr als fragwürdigen Ergebnis. Eine Umfrage hat keinen Einfluss auf die Verbesserung der Betriebssicherheit, die Nachbereitung von Vorkommnissen und Schäden schon. Der Fokus sollte eindeutig auf der Überwachung der Prozesse liegen, nicht auf der Effizienz des SMS selbst!

Im ICAO SMM werden Schadensraten und Flugzeugabstürze als performance indicators genannt. Hier hat das SMS keinen unmittelbaren Einfluss, ist aber in der Bringschuld → Allerhöchstens im GM!

response

Noted

Performance monitoring of an aerodrome's safety management system is vital for establishing a clear picture of its functioning, while it is an inseparable part of the safety management system itself. Safety indicators and targets should be agreed with the competent authority.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(b)(6) –
Management – THE MANAGEMENT OF CHANGE**

p. 88

comment

536

comment by: *Flughafen Düsseldorf GmbH*

Sollte dies eine Aufgabe des SMS sein (dies ist hier nicht eindeutig definiert) ist unklar, wie das SMS alle Änderungen am Flughafen betrachten und bewerten soll. Dies ist nicht nur unverhältnismäßig, sondern auch unrealistisch! Alle Entscheidungen, Änderungen und neue Verfahren müssten vorab durch das SMS gesichtet werden. Dies würde zu einem massiven Mehraufwand in Zeit, Personal und damit auch höhere Kosten führen. Wie sollen kleine und mittelgroße Flughäfen dies mit einem halbwegs praktikablen Aufwand durchführen können?

Die ICAO hat im Zusammenhang mit dem Management of Change im ICAO SMM lediglich eine Empfehlung ausgesprochen. Daher sollte dies auch nur in dem GM auftauchen.

response

Noted

Management of change is an inseparable process of a safety management system, while the latter has to be proportionate to the size of the organisation concerned. This is also foreseen in point 3.2 of Appendix 7 of Annex 14, while the text of the AMC is based on ICAO Doc 9859.

Therefore, the Agency does not share the view about the disproportionality of the proposed AMC with regard to small and medium

aerodromes, since it is the aerodrome operator that should design processes and procedures which are suitable to its organisation.

comment

792

comment by: *Airport Nuremberg - NUE/EDDN*

Should that be meant to be a task of the safety management system (which is not clearly defined through that regulation) it is not clear, how the safety management should be informed, assess and evaluate all possible changes at the aerodrome! Besides being disproportionate this is highly unrealistic. All decisions, changes, actions and new processes would have to be monitored and evaluated through the safety management in advance, which eventually leads to a massive additional amount of personnel resources, time and costs. How shall small and medium sized airports be able to handle that with a halfway decent feasible effort? **Due to the questionable enforcement this AMC should be moved to the guidance material!**

The mixing of the currently separated areas Airport Operations / Traffic Management and Safety Management is evident in all present documents. Amongst others, this shows especially in the use of excerpts from the ICAO Safety Management Manual which are used in EASA documents and are not explicitly referring to SMS. The present task of the safety manager, too, i.e. the checking of compliance with national and international rules and recommendations, especially by means of internal audits, is not separately listed under the SMS.

Since it is especially important for the operators of major airports to define clear lines of responsibility, it would be more useful (A) unambiguously connect the definitive areas of responsibility with the function or (B) refer to the relevant documents like ICAO's Safety Management Manual.

response

Noted

Management of change is an inseparable process of a safety management system, while the latter has to be proportionate to the size of the organisation concerned. This is also foreseen in point 3.2 of Appendix 7 of Annex 14, while the text of the AMC is based on ICAO Doc 9859.

Therefore, the Agency does not share the view about the disproportionality of the proposed AMC with regard to small and medium aerodromes, since it is the aerodrome operator that should design processes and procedures which are suitable to its organisation.

comment

1079

comment by: *NATS National Air Traffic Services Limited*

This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.

response

Noted

comment	<p>1541 comment by: Flughafen Graz Betriebs GmbH</p> <p>Sollte dies eine Aufgabe des SMS sein (nicht eindeutig definiert) ist unklar, wie das SMS alle Änderungen am Flughafen betrachten und bewerten soll? Dies ist nicht nur unverhältnismäßig, sondern auch unrealistisch! Alle Entscheidungen, Änderungen und neue Verfahren müssten vorab durch das SMS gesichtet werden → Massiver Mehraufwand in Zeit, Personal und damit auch höhere Kosten.</p> <p>Hier ist mit dem ICAO SMM eine klare Empfehlung eine Guidance gegeben. Wie sollen kleine und mittelgroße Flughäfen dies mit einem halbwegs praktikablen Aufwand durchführen können?</p>
response	<p>Noted</p> <p>Management of change is an inseparable process of a safety management system, while the latter has to be proportionate to the size of the organisation concerned. This is also foreseen in point 3.2 of Appendix 7 of Annex 14, while the text of the AMC is based on ICAO Doc 9859.</p> <p>Therefore, the Agency does not share the view about the disproportionality of the proposed AMC with regard to small and medium aerodromes, since it is the aerodrome operator that should design processes and procedures which are suitable to its organisation.</p>
comment	<p>2524 comment by: ADV -German Airports Association</p> <p>AMC1-ADR.OR.D.005(b)(6) – Management THE MANAGEMENT OF CHANGE</p> <p>The aerodrome operator should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the aerodrome operator’s existing hazard identification, safety risk assessment and mitigation processes. For assessment of changes ADR.OR.B.045 and its related AMCs also apply.</p> <p>Sollte dies eine Aufgabe des SMS sein (nicht eindeutig definiert) ist unklar, wie das SMS alle Änderungen am Flughafen betrachten und bewerten soll? Dies ist nicht nur unverhältnismäßig, sondern auch unrealistisch! Alle Entscheidungen, Änderungen und neue Verfahren müssten vorab durch das SMS gesichtet werden ◊ Massiver Mehraufwand in Zeit, Personal und damit auch höhere Kosten.</p> <p>Hier ist mit dem ICAO SMM eine klare Empfehlung eine Guidance gegeben. Wie sollen kleine und mittelgroße Flughäfen dies mit einem halbwegs praktikablen Aufwand durchführen können?</p>
response	<p>Noted</p> <p>Management of change is an inseparable process of a safety management system, while the latter has to be proportionate to the size of the organisation concerned. This is also foreseen in point 3.2 of Appendix 7 of Annex 14, while the text of the AMC is based on ICAO Doc 9859.</p> <p>Therefore, the Agency does not share the view about the disproportionality of the proposed AMC with regard to small and medium</p>

aerodromes, since it is the aerodrome operator that should design processes and procedures which are suitable to its organisation.

comment

2555

comment by: *MST / STR - Stuttgart Airport*

AMC1-ADR.OR.D.005(b)(6) – Management

THE MANAGEMENT OF CHANGE

The aerodrome operator should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the aerodrome operator's existing hazard identification, safety risk assessment and mitigation processes. For assessment of changes ADR.OR.B.045 and its related AMCs also apply.

Sollte dies eine Aufgabe des SMS sein (nicht eindeutig definiert) ist unklar, wie das SMS alle Änderungen am Flughafen betrachten und bewerten soll? Dies ist nicht nur unverhältnismäßig, sondern auch unrealistisch! Alle Entscheidungen, Änderungen und neue Verfahren müssten vorab durch das SMS gesichtet werden → Massiver Mehraufwand in Zeit, Personal und damit auch höhere Kosten.

Hier ist mit dem ICAO SMM eine klare Empfehlung eine Guidance gegeben. Wie sollen kleine und mittelgroße Flughäfen dies mit einem halbwegs praktikablen Aufwand durchführen können?

response

Noted

Management of change is an inseparable process of a safety management system, while the latter has to be proportionate to the size of the organisation concerned. This is also foreseen in point 3.2 of Appendix 7 of Annex 14, while the text of the AMC is based on ICAO Doc 9859.

Therefore, the Agency does not share the view about the disproportionality of the proposed AMC with regard to small and medium aerodromes, since it is the aerodrome operator that should design processes and procedures which are suitable to its organisation.

comment

2622

comment by: *ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen*

AMC1-ADR.OR.D.005(b)(6) – Management

THE MANAGEMENT OF CHANGE

Sollte dies eine Aufgabe des SMS sein (nicht eindeutig definiert) ist unklar, wie das SMS alle Änderungen am Flughafen betrachten und bewerten soll? Dies ist nicht nur unverhältnismäßig, sondern auch unrealistisch! Alle Entscheidungen, Änderungen und neue Verfahren müssten vorab durch das SMS gesichtet werden → Massiver Mehraufwand in Zeit, Personal und damit auch höhere Kosten.

Hier ist mit dem ICAO SMM eine klare Empfehlung eine Guidance gegeben. Wie sollen kleine und mittelgroße Flughäfen dies mit einem halbwegs praktikablen Aufwand durchführen können?

response

Noted

Management of change is an inseparable process of a safety management system, while the latter has to be proportionate to the size of the organisation concerned. This is also foreseen in point 3.2 of Appendix 7 of Annex 14, while the text of the AMC is based on ICAO Doc 9859.

Therefore, the Agency does not share the view about the disproportionality of the proposed AMC with regard to small and medium aerodromes, since it is the aerodrome operator that should design processes and procedures which are suitable to its organisation.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.005(b)(6) –** p. 88-89
Management – THE MANAGEMENT OF CHANGE

comment	701	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und Plausibilität überprüft werden müssen.	
response	<i>Accepted</i>	
	The text of the relevant Guidance Material is based on ICAO safety management manual (Doc 9859). Reference to ICAO Doc 9859 has been removed.	

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(b)(7) –** p. 89
**Management – CONTINUOUS IMPROVEMENT OF THE SAFETY
MANAGEMENT SYSTEM**

comment	804	comment by: <i>Airport Nuremberg - NUE/EDDN</i>
	This AMC must be moved to the guidance material! It is not even clear what the indicators of a substandard performance of the Safety Management System could be. Additionally the term "formal process" is not further specified. Neither national legislation nor ICAO Annex 14 demand anything like that. Further the "proactive evaluation of an individual's performance" could be misleading and misinterpreted with the surveillance of staff. Focus should be laid on the improvement of processes, not the improvement of the safety management. Moving this AMC to the guidance material leaves the aerodromes the change to decide on the efficiency and productivity of monitoring the safety management.	
response	<i>Noted</i>	
	The text is based on Annex 14, Appendix 7, point 3.3 and the relevant ICAO Doc 9859, while relevant Guidance Material is provided.	

comment	1764	comment by: <i>Cologne/Bonn Airport</i>
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	delete or move to GM; not covered by Annex 14
response	<p><i>Noted</i></p> <p>The text is based on Annex 14, Appendix 7, point 3.3 and the relevant ICAO Doc 9859, while relevant guidance materil is provided.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC2-ADR.OR.D.005(b)(7) – Management – CONTINUOUS IMPROVEMENT OF THE QUALITY AND SECURITY MANAGEMENT FOR AERONAUTICAL DATA AND AERONAUTICAL INFORMATION PROVISION ACTIVITIES</p>	<p>p. 89</p>
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comment	<p>1080 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>This AMC does not appear to be related to the correct IR. ADR.OR.D.005(b)(7) is an aspect of "Management". ADR.OR.D.007 is about "Management of aeronautical data and aeronautical information" but there is no (b)(7).</p>
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response	<p><i>Noted</i></p> <p>The AMC has been reviewed and removed.</p>
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comment	<p>1252 comment by: <i>UK CAA</i></p> <p>Page No: 89</p> <p>Paragraph No: AMC2-ADR.OR.D.005 (b)(7)</p> <p>Comment: The title is misleading. Aeronautical Data and Aeronautical Information are covered in SES Regs for the interoperability IR on ADQ. The title of this section should simply be Security Management for Aerodromes.</p> <p>Justification: Clarification</p> <p>Proposed Text: Replace title with continuous improvement of the quality and security management of aerodromes.</p>
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response	<p><i>Noted</i></p> <p>The AMC has been reviewed and removed.</p>
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comment	<p>1296 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none"> • AMC/GM to ANNEX II - Part-OR – AMC2-ADR.OR.D.005(b)(7) – Management (p89) • AMC/GM to ANNEX II – Part-OR – AMC2-ADR.OR.E.005 – Aerodrome manual (p109-114) <p><u>2. Justification and proposed text / comment</u></p>
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	<p>AMC2-ADR.OR.D.005(b)(7) is not related to ADR.OR.D.005 which deals only with improvement of the SMS. Furthermore, it may be inconsistent with future regulation IR-ADQ. Thus DGAC proposes to delete AMC2-ADR.OR.D.005(b)(7) and to make the following change in the content of the proposed GM1-ADR.OR.E.010 – Structure of the aerodrome manual: AMC2-GM1-ADR.OR.E.00510 – Structure of the aAerodrome manual “[...]” B. PART B [...]” 2.4 A description of quality and security management system for aeronautical data and aeronautical information provision activities and related procedures. [...]”</p>
response	<p>Accepted</p> <p>The AMC has been reviewed and removed.</p>
comment	<p>2063 comment by: <i>AENA - Aeropuertos Españoles y Navegación Aérea</i></p> <p>AMC2-ADR.OR.D.005(b)(7) is not related to ADR.OR.D.005 which deals only with improvement of the SMS. Furthermore, it may be inconsistent with future regulation IR-ADQ. It is proposed to delete AMC2-ADR.OR.D.005(b)(7) and to make the following change in the content of the proposed GM1-ADR.OR.E.010 – Structure of the aerodrome manual: AMC2-GM1-ADR.OR.E.00510 – Structure of the aAerodrome manual “[...]” B. PART B [...]” 2.4 A description of quality and security management system for aeronautical data and aeronautical information provision activities and related procedures. [...]”</p>
response	<p>Accepted</p> <p>The AMC has been reviewed and removed.</p>
comment	<p>2638 comment by: <i>Fraport AG</i></p> <p>AMC2-ADR.OR.D.005(b)(7) – Management</p> <p>Editorial</p> <p>Complete paragraph</p> <p>Delete complete paragraph</p> <p>Fraport AG Requirement already addressed in Article10 of (EU) No 73/2010. Proposal is to delete this, to avoid duplication in regulation</p>
response	<p>Accepted</p>

The AMC has been reviewed and removed.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.005(b)(7) –
Management – CONTINUOUS IMPROVEMENT OF THE SAFETY
MANAGEMENT SYSTEM** p. 89

comment	702	comment by: Flughafen Düsseldorf GmbH
	Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und Plausibilität überprüft werden müssen.	
response	Accepted	
	The text of the relevant Guidance Material is based on ICAO safety management manual (Doc 9859). Reference to ICAO Doc 9859 will be removed.	

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(b)(8) –
Management – TRAINING** p. 90

comment	342	comment by: Avinor
	AMC1-ADR.OR.D.005(b)(8). Reference AMC1-ADR.OR.D.015 (h) is missing (or wrong reference).	
response	Accepted	
	The reference has been amended.	

comment	537	comment by: Flughafen Düsseldorf GmbH
	<p>Diese Forderungen sind viel zu detailliert! Ein generelles Safety Training wäre sicherlich sinnvoll. Jedoch sollten Flughäfen das Training entsprechend ihrer Größe aufbauen und umsetzen (Bsp. generell im Rahmen der Security Schulung oder CBT) können.</p> <p>Zur Umsetzung der in diesem Abschnitt beschriebenen Forderungen wären u. E. allein 2-3 Mitarbeiter zusätzlich notwendig, um jeden Bereich des Flughafens (neu und alt) kontinuierlich in diesem geforderten Detailgrad zu schulen.</p> <p>Es ist anzuzweifeln, dass der Nutzen der Durchführung personenbezogener Schulungen (appropriate individual's responsibility and involvement in SMS) den zusätzlichen personellen und zeitlichen Aufwand rechtfertigt.</p> <p>Aus diesem Grunde sind diese Inhalte, wenn sie überhaupt berücksichtigt werden sollen, in das GM zu verschieben.</p>	

response

Noted

The intent of this AMC, which has been reviewed and amended, is to provide a way to comply with the relevant requirement contained in point 4.1 of Appendix 7 of Annex 14, which foresee the implementation of a training programme for all personnel, in order to fulfil their SMS duties. The successful implementation and efficient functioning of a safety management system largely depends upon the skills and knowledge and awareness of the people involved in the operation of the system. It is, therefore, important that all people receive relevant and adequate training meeting their needs, based on their role in the organisation, which, however, does not mean that the training should be individualised. The training needs depend also on the complexity of the safety management system and the aerodrome organisation itself.

comment

759

comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR.OR.D.005(b)(8)	Management TRAINING
Proposition/commentaire	(a) Il convient de modifier de la manière suivante: "The aerodrome operator should establish a safety training programme to all its safety related staff, regardless of their level in the organisation."
Justification	Cette AMC ne concerne que la sécurité. L'exploitant d'aérodrome ne peut établir son programme de formation relatif à la sécurité que pour son personnel et non pas pour celui des tiers.
Traduction de courtoisie	It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to all its safety related staff, regardless of their level in the organisation." This AMC does not concern safety. The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.

response

Partially accepted

The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue and firefighting, maintenance and management personnel of the aerodrome operator. The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety

response Partially accepted

The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator.

The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes, etc), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.

comment 1081 comment by: *NATS National Air Traffic Services Limited*
AMC1-ADR.OR.D.015(h) is referred to but it does not exist

response Accepted
The reference has been amended.

comment 1082 comment by: *NATS National Air Traffic Services Limited*
AMC1-ADR.OR.D.005(b)(8)(c) - This AMC could be interpreted as meaning all training. It should be qualified to be "safety training".

response Accepted
The title of the AMC has been amended.

comment 1295 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM to ANNEX II - Part-OR - AMC1-ADR.OR.D.005(b)(5) – Management (p87)
- AMC/GM to ANNEX II - Part-OR - AMC1-ADR.OR.D.005(b)(8) – Management (p90)

2. Justification and proposed text / comment

Previous experience of SMS implementation in France has shown that safety audits cannot be performed in small structures.

Moreover, small organizations will probably have difficulties to implement the full scope of AMC1-ADR.OR.D.005(b)(8) on training.

That's why it is essential, as specified in the Basic regulation 216-2008 - article 8a - paragraph 6, that the measures "shall be proportionate to the size, traffic, category and complexity of the aerodrome and nature and volume of operations thereon".

Thus DGAC proposes to add the content of GM1-ADR.OR.D.015(b) in these provisions "as appropriate depending on the size of the organisation and the type and complexity of operations" (see below).

It is by the way suggested to define "safety performance indicators" and "safety performance targets".

AMC1-ADR.OR.D. 005(b)(5) – Management

"SAFETY PERFORMANCE MONITORING AND MEASUREMENT

[...]

(b) This process should include, as appropriate depending on the size of the organisation and the type and complexity of operations:

[...]"

AMC1-ADR.OR.D.005(b)(8) – Management

"TRAINING

(a) The aerodrome operator should establish a safety training programme to all staff, regardless of their level in the organisation, as appropriate depending on the size of the organisation and the type and complexity of operations.

(b) The safety training programme should consist of the following, as appropriate depending on the size of the organisation and the type and complexity of operations:

(1) a documented process to identify training requirements for each area of activity within the aerodrome organisation, and track completion of required training;

(2) a validation process that measures the effectiveness of training;

(3) initial job-specific training;

(4) induction/initial training incorporating safety management system, including Human Factors and organisational factors; and

(5) recurrent safety training.

(c) A training file should be developed for each employee, as appropriate depending on the size of the organisation and the type and complexity of operations, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training.

(d) The aerodrome operator should specify initial and recurrent safety training standards for operational personnel, managers and supervisors, senior managers and the accountable manager, as appropriate depending on the size of the organisation and the type and complexity of operations. The amount and level of detail of safety training should be appropriate to the individual's responsibility and involvement in the SMS.

(e) The aerodrome operator should specify safety training responsibilities, including contents, frequency, validation and safety training records management.

(f) The information provided in points (d) and (e) above should be included in the aerodrome manual.

This training programme may be combined with the training programme provided for in AMC1- ADR.OR.D.015 (h)."

response

Partially accepted

The relevant draft requirement (ADR.OR.D.005) foresees in paragraph (e) that the safety management system shall be proportionate to the organisation, while the relevant AMC does not foresee any specific way in achieving the target, which is the provision of relevant and adequate safety management system training to meet the needs of the persons involved. However, the text of the AMC has been simplified, in the suggested direction.

comment

1342

comment by: Euroairport Bâle-Mulhouse

Attachment [#111](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(8)

Référence: AMC1-ADR.OR.D.005(b)(8)
Management
TRAINING

Traduction de courtoisie
It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to all **its safety related staff**, regardless of their level in the organisation."
This AMC does not concern safety.
The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.

response Partially accepted

The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator.

The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes, etc.), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.

comment 1544 comment by: *Flughafen Graz Betriebs GmbH*

Viel zu detailliert! Generelles Safety Training wäre ok, dann können Flughäfen das Training entsprechend ihrer Größe aufbauen und umsetzen (Bsp. generell im Rahmen der Security Schulung oder CBT). Hier wären allein 2-3 Mitarbeiter zusätzlich notwendig, um jeden Bereich des Flughafens neu und alt kontinuierlich in diesem Detailgrad zu schulen. Für eine Organisation kleinerer oder mittlerer Größenordnung ist dies keinesfalls gerechtfertigt.

Eher unwahrscheinlich ist, dass der Nutzen der Durchführung personenbezogener Schulungen (appropriate individual's responsibility and involvement in SMS) den zusätzlichen personellen und zeitlichen Aufwand der Erstellung rechtfertigt.

response Noted

The intent of this AMC is to provide a way to comply with the relevant requirement contained in point 4.1 of Appendix 7 of Annex 14, which foresees the implementation of a training programme for all personnel, in order to fulfil their SMS duties.

The successful implementation and efficient functioning of a safety management system largely depends upon the skills and knowledge and awareness of the people involved in the operation of the system. It is, therefore, important that all people receive relevant and adequate training

meeting their needs, based on their role in the organisation, which, however, does not mean that the training should be individualised. The training needs depend also on the complexity of the safety management system and the aerodrome organisation itself.

comment 1594 comment by: *Aéroport de Marseille - MRS/LFML*

It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to all its safety related staff, regardless of their level in the organisation."

This AMC does not concern safety.
The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff

response Partially accepted

The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator.
The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes etc), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.

comment 1654 comment by: *Flughafen Linz-Hörsching - LNZ/LOWL*

(a) (4) change "...including Human Factors and organisational factors..." in "...including organisational factors and if necessary Human Factors"

response Noted

This AMC has been developed based on ICAO Doc 9859 which refers to both human and organisational factors.

comment 1765 comment by: *Cologne/Bonn Airport*

(b): should be moved to GM

response Noted

comment 1839 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#112](#)

UAF	NPA	2011-20	(B.II)	AMC1-ADR.OR.D.005(b)(8)
Référence: Management TRAINING				AMC1-ADR.OR.D.005(b)(8)

	<p>Traduction de courtoisie It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to at its safety related staff, regardless of their level in the organisation." This AMC does not concern safety. The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.</p>
<p>response</p>	<p><i>Partially accepted</i></p> <p>The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator. The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes etc), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.</p>
<p>comment</p>	<p>1846 comment by: <i>ATB Aéroport Toulouse-Blagnac - TLS/LFBO</i> Attachment #113</p> <p>ATB NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(8)</p> <p>Référence: AMC1-ADR.OR.D.005(b)(8) Management TRAINING</p> <p>Traduction de courtoisie It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to at its safety related staff, regardless of their level in the organisation." This AMC does not concern safety. The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.</p>
<p>response</p>	<p><i>Partially accepted</i></p> <p>The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator. The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes etc), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.</p>

comment	<p>1851 comment by: <i>Tarbes-Lourdes-Pyrénées airport</i></p> <p>Attachment #114</p> <p>NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(8)</p> <p>Référence: AMC1-ADR.OR.D.005(b)(8) Management TRAINING</p> <p>Traduction de courtoisie It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to all its safety related staff, regardless of their level in the organisation." This AMC does not concern safety. The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.</p>
response	<p><i>Partially accepted</i></p> <p>The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator. The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes etc), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.</p>
comment	<p>1856 comment by: <i>Aéroport Paris Vatry - XCR/LFOK</i></p> <p>Attachment #115</p> <p>NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(8)</p> <p>Référence: AMC1-ADR.OR.D.005(b)(8) Management TRAINING</p> <p>Traduction de courtoisie It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to all its safety related staff, regardless of their level in the organisation." This AMC does not concern safety. The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.</p>
response	<p><i>Partially accepted</i></p> <p>The text of the relevant Implementing Rule and the AMC has been</p>

reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator.

The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes etc), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.

comment

1919

comment by: Pau Pyrénées Airport - PUF/LFBP

It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to all its safety related staff, regardless of their level in the organisation."

This AMC does not concern safety.

The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.

response

Partially accepted

The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator.

The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes etc), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.

comment

1942

comment by: ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD

Attachment [#116](#)

ADBM - NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(8)

Référence:
 Management
 TRAINING

AMC1-ADR.OR.D.005(b)(8)

Traduction de courtoisie
 It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to all its safety related staff, regardless of their level in the organisation."
 This AMC does not concern safety.
 The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.

response

Partially accepted

The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator.

The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes etc), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.

comment

2062

comment by: AENA - Aeropuertos Españoles y Navegación
Aérea

AMC1-ADR.OR.D.005(b)(8) – Management

“TRAINING

(a) The aerodrome operator should establish a safety training programme to all staff, *regardless of their level in the organisation*, as appropriate depending on the size of the organisation and the type and complexity of operations.

(b) The safety training programme should consist of the following, as appropriate depending on the size of the organisation and the type and complexity of operations:

(1) a documented process to identify training requirements for each area of activity within the aerodrome organisation, and track completion of required training;

(2) a validation process that measures the effectiveness of training;

(3) initial job-specific training;

(4) induction/initial training incorporating safety management system, including Human Factors and organisational factors; and

(5) recurrent safety training.

(c) A training file should be developed for each employee, as appropriate depending on the size of the organisation and the type and complexity of operations, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training.

(d) The aerodrome operator should specify initial and recurrent safety training standards for operational personnel, managers and supervisors, senior managers and the accountable manager, as appropriate depending on the size of the organisation and the type and complexity of operations. The amount and level of detail of safety training should be appropriate to the individual's responsibility and involvement in the SMS.

(e) The aerodrome operator should specify safety training responsibilities, including contents, frequency, validation and safety training records management.

(f) The information provided in points (d) and (e) above should be included in the aerodrome manual.

This training programme may be combined with the training programme provided for in AMC1- ADR.OR.D.015 (h)."

response

Partially accepted

The relevant draft requirement (ADR.OR.D.005) foresees in paragraph (e) that the safety management system shall be proportionate to the

organisation, while the relevant AMC does not foresee any specific way in achieving the target, which is the provision of relevant and adequate safety management system training to meet the needs of the persons involved. However, the text of the AMC has been simplified, in the suggested direction.

comment

2165

comment by: *Aéroports De Lyon*

"The aerodrome operator should establish a safety training programme to all staff, regardless of their level in the organisation"

Problème n°1: "... in the organisation"

Quelle organisation? S'agit-il de l'aéroport dans sa globalité ou de l'entreprise gestionnaire? Il est important de spécifier ce point car l'ampleur de la mise en oeuvre est complètement différente.

S'il s'agit de l'aéroport dans sa globalité, l'exploitant n'a ni les moyens, ni le droit de former du personnel avec qui il n'a aucun contrat.

Proposition: remplacer "organisation" par "operator's organisation"

Problème n°2: "... to all staff..."

Il n'est pas pertinent de former tout le personnel car certain d'entre eux ne se rendent jamais sur l'aire de mouvement (Exemple: parking voiture, direction financière...). Il n'y a aucun intérêt à former ce personnel.

Proposition: remplacer "to all staff" par "to all safety related staff"

response

Partially accepted

The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel.

comment

2236

comment by: *Swedavia AB - Swedish airports (currently 11 airports)*

AMC1-ADR.OR.D.005(b)(8). Reference AMC1-ADR.OR.D.015 (h) is missing (or wrong reference).

response

Accepted

The reference has been amended.

comment

2380

comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC1-ADR.OR.D.005(b)(8)	Management TRAINING
Proposition/commentaire	(a) Il convient de modifier de la manière suivante: "The aerodrome operator should establish a safety training programme to all its safety related staff, regardless of their level in the organisation."

Justification	Cette AMC ne concerne que la sécurité. L'exploitant d'aérodrome ne peut établir son programme de formation relatif à la sécurité que pour son personnel et non pas pour celui des tiers.
Traduction de courtoisie	<p>It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to at its safety related staff, regardless of their level in the organisation."</p> <p>This AMC does not concern safety. The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.</p>

response

Partially accepted

The text of the relevant Implementing Rule and the AMC has been reworded to address the need for the training of operations, rescue, and firefighting, maintenance and management personnel of the aerodrome operator.

The need for training of personnel of third parties with regard to certain elements of the aerodrome SMS (safety reporting, aerodrome safety programmes etc), which is essential for the proper functioning of the aerodrome SMS, is now dealt with in AMC1-ADR.OR.d.017(a). Although it is not necessary that third such training is delivered by the aerodrome operator itself, the aerodrome operator has to ensure its delivery.

comment

2436

comment by: *SEARD - Societe d'exploitation des Aeroports de Rennes et Dinard*

Attachment [#117](#)

SEARD NPA 2011-20 (B.II) AMC1-ADR.OR.D.005(b)(8)

Référence:
 Management
 TRAINING

AMC1-ADR.OR.D.005(b)(8)

Traduction de courtoisie
 It is appropriate to modify in the following way: "The aerodrome operator should establish a safety training programme to ~~at~~ **its safety related** staff, regardless of their level in the organisation."
 This AMC does not concern safety. The aerodrome operator can establish his/her safety training programme only for his/her staff and not for the thirds' staff.

response

Partially accepted

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comment

2525

comment by: *ADV -German Airports Association*

AMC1-ADR.OR.D.005(b)(8) – Management TRAINING

(a) The aerodrome operator should establish a safety training programme to all staff, regardless of their level in the organisation.

(b) The safety training programme should consist of the following:

(1) a documented process to identify training requirements for each area of activity within the aerodrome organisation, and track completion of required training;

(2) a validation process that measures the effectiveness of training; (3) initial job-specific training;

(4) induction/initial training incorporating safety management system , including Human Factors and organisational factors; and

(5) recurrent safety training.

(c) A training file should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training.

(d) The aerodrome operator should specify initial and recurrent safety training standards for operational personnel, managers and supervisors, senior managers and the accountable manager. The amount and level of detail of safety training should be appropriate to the individual's responsibility and involvement in the SMS.

(e) The aerodrome operator should specify safety training responsibilities, including contents, frequency, validation and safety training records management.

(f) The information provided in points (d) and (e) above should be included in the aerodrome manual.

Viel zu detailliert! Generelles Safety Training wäre ok, dann können Flughäfen das Training entsprechend ihrer Größe aufbauen und umsetzen (Bsp. generell im Rahmen der Security Schulung oder CBT). Hier wären allein 2-3 Mitarbeiter zusätzlich notwendig, um jeden Bereich des Flughafens neu und alt kontinuierlich in diesem Detailgrad zu schulen. Für eine Organisation kleinerer oder mittlerer Größenordnung ist dies keinesfalls gerechtfertigt.

Eher unwahrscheinlich ist, dass der Nutzen der Durchführung personenbezogener Schulungen (appropriate individual's responsibility and involvement in SMS) den zusätzlichen personellen und zeitlichen Aufwand der Erstellung rechtfertigt.

response

Noted

The intent of this AMC, which has been reviewed and amended, is to provide a way to comply with the relevant requirement contained in point 4.1 of Appendix 7 of Annex 14, which foresees the implementation of a training programme for all personnel, in order to fulfil their SMS duties. The successful implementation and efficient functioning of a safety management system largely depends upon the skills and knowledge and awareness of the people involved in the operation of the system. It is, therefore, important that all people receive relevant and adequate training meeting their needs, based on their role in the organisation, which, however, does not mean that the training should be individualised. The training needs depend also on the complexity of the safety management system and the aerodrome organisation itself.

comment

2556

comment by: MST / STR - Stuttgart Airport

**AMC1-ADR.OR.D.005(b)(8) – Management
TRAINING**

- (a) The aerodrome operator should establish a safety training programme to all staff, regardless of their level in the organisation.
- (b) The safety training programme should consist of the following:
 - (1) a documented process to identify training requirements for each area of activity within the aerodrome organisation, and track completion of required training;
 - (2) a validation process that measures the effectiveness of training;
 - (3) initial job-specific training;
 - (4) induction/initial training incorporating safety management system , including Human Factors and organisational factors; and
 - (5) recurrent safety training.
- (c) A training file should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training.
- (d) The aerodrome operator should specify initial and recurrent safety training standards for operational personnel, managers and supervisors, senior managers and the accountable manager. The amount and level of detail of safety training should be appropriate to the individual's responsibility and involvement in the SMS.
- (e) The aerodrome operator should specify safety training responsibilities, including contents, frequency, validation and safety training records management.
- (f) The information provided in points (d) and (e) above should be included in the aerodrome manual.

Viel zu detailliert! Generelles Safety Training wäre ok, dann können Flughäfen das Training entsprechend ihrer Größe aufbauen und umsetzen (Bsp. generell im Rahmen der Security Schulung oder CBT). Hier wären allein 2-3 Mitarbeiter zusätzlich notwendig, um jeden Bereich des Flughafens neu und alt kontinuierlich in diesem Detailgrad zu schulen. Für eine Organisation kleinerer oder mittlerer Größenordnung ist dies keinesfalls gerechtfertigt.

Eher unwahrscheinlich ist, dass der Nutzen der Durchführung personenbezogener Schulungen (appropriate individual's responsibility and involvement in SMS) den zusätzlichen personellen und zeitlichen Aufwand

	der Erstellung rechtfertigt.
response	<p><i>Noted</i></p> <p>The intent of this AMC, which has been reviewed and amended, is to provide a way to comply with the relevant requirement contained in point 4.1 of Appendix 7 of Annex 14, which foresees the implementation of a training programme for all personnel, in order to fulfil their SMS duties. The successful implementation and efficient functioning of a safety management system largely depends upon the skills and knowledge and awareness of the people involved in the operation of the system. It is, therefore, important that all people receive relevant and adequate training meeting their needs, based on their role in the organisation, which, however, does not mean that the training should be individualised. The training needs depend also on the complexity of the safety management system and the aerodrome organisation itself.</p>
comment	<p>2623 comment by: <i>ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen</i></p> <p>AMC1-ADR.OR.D.005(b)(8) – Management TRAINING</p> <p>Viel zu detailliert! Generelles Safety Training wäre ok, dann können Flughäfen das Training entsprechend ihrer Größe aufbauen und umsetzen (Bsp. generell im Rahmen der Security Schulung oder CBT). Hier wären allein 2-3 Mitarbeiter zusätzlich notwendig, um jeden Bereich des Flughafens neu und alt kontinuierlich in diesem Detailgrad zu schulen. Für eine Organisation kleinerer oder mittlerer Größenordnung ist dies keinesfalls gerechtfertigt.</p> <p>Eher unwahrscheinlich ist, dass der Nutzen der Durchführung personenbezogener Schulungen (appropriate individual's responsibility and involvement in SMS) den zusätzlichen personellen und zeitlichen Aufwand der Erstellung rechtfertigt.</p>
response	<p><i>Noted</i></p> <p>The intent of this AMC, which has been reviewed and amended, is to provide a way to comply with the relevant requirement contained in point 4.1 of Appendix 7 of Annex 14, which foresees the implementation of a training programme for all personnel, in order to fulfil their SMS duties. The successful implementation and efficient functioning of a safety management system largely depends upon the skills and knowledge and awareness of the people involved in the operation of the system. It is, therefore, important that all people receive relevant and adequate training meeting their needs, based on their role in the organisation, which, however, does not mean that the training should be individualised. The training needs depend also on the complexity of the safety management system and the aerodrome organisation itself.</p>

Management – STAFF SAFETY TRAINING REQUIREMENTS

comment 1083 comment by: *NATS National Air Traffic Services Limited*
There are multiple "should" in this GM implying that some are AMC rather than GM. Suggest adjusting text to be AMC/GM as appropriate.

response Noted

comment 1982 comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM- Book II - GM1-ADR.OR.D.005(b)(8) – Management – *STAFF SAFETY TRAINING REQUIREMENTS* (p90 - 91)

2. Justification and proposed text / comment
The notion of "acceptable level of safety" has not been retained in the formal groups nor in the last productions in ICAO (PANS Aerodromes): sub paragraph (c)(2) in not consistent with the other provisions in the NPA, with, for safety assessments, are close to PANS Aerodromes.
It is consequently proposed to modify sub paragraph (c)(2) of GM1-ADR.OR.D.005(b)(8) – Management as follows :

GM1-ADR.OR.D.005(b)(8) – Management
"STAFF SAFETY TRAINING REQUIREMENTS
[...]
(c) [...]
(2) *In addition to the objectives of the two previous employee groups, safety training should include safety assurance and safety promotion, safety roles and responsibilities, and establishing acceptable levels of adequate safety objectives.*

response Noted

The text reflects the content of the ICAO Doc 9859 (Safety Management Manual).

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(b)(9) –
Management – SAFETY COMMUNICATION**

p. 91

comment 15 comment by: *ACI EUROPE - Airports Council International*
delete ", and the SMS should be visible in all aspects of operations"
Justification: does not make sense

response Partially accepted

The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

comment	320	comment by: <i>CAA Austria - Ministry of Transport</i>
	(a) "SMS should be visible in all aspects of operations" The word "visible" have to be clarified. SMS could be applied or available.	
response	Partially accepted The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.	
comment	343	comment by: <i>Avinor</i>
	AMC1.ADR.OR.D.005 (b) (9) (a). Delete ", and the SMS should be visible in all aspects of operations". The sentence does not make sense.	
response	Partially accepted The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.	
comment	543	comment by: <i>Flughafen Düsseldorf GmbH</i>
	a) Das das SMS in allen operativen Bereichen sichtbar sein muss, macht keinen Sinn. c) 4) Was ist mit "safety procedures" gemeint? Diese sind nicht definiert? In dieser Qualität gehören die Inhalte allenfalls zu dem Guidance Material.	
response	<i>Partially accepted</i> The Agency believes that AMC is the appropriate level for this type of material. Paragraph (a) which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The relevant text has been reworded. With regard to paragraph (c) the Agecny believes that there is no need to define the term 'safety procedures'.	
comment	558	comment by: <i>Vienna International Airport</i>
	(a) define "visible"	
response	Partially accepted The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.	
comment	1171	comment by: <i>Salzburger Flughafen GmbH</i>
	(a) define "visible"	
response	Partially accepted	

The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

comment 1467 comment by: *Flughafen Graz Betriebs GmbH*

(a) define "visible"

response Partially accepted

The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

comment 1474 comment by: *Cologne/Bonn Airport*

(a) the wording "and the SMS should be visible in all aspect of opeations" makes no sense

response Partially accepted

The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

comment 1515 comment by: *Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH*

(a) define "visible"

response Partially accepted

The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

comment 1526 comment by: *Geneva International Airport (ROMIG)*

Delete ", and the SMS should be visible in all aspects of operations"

response Partially accepted

The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

comment 1532 comment by: *Geneva International Airport (ROMIG)*

Delete ", and the SMS should be visible in all aspects of operations"

The SMS cannot be "visibile in all parts of the operation", this does not make sense.

response Partially accepted

The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

comment 1630 comment by: *Flughafen Linz-Hörsching - LNZ/LOWL*

	(a) define "visible"
response	<p>Partially accepted</p> <p>The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.</p>
comment	<p>1986 comment by: <i>Munich Airport International</i></p> <p>(a)</p> <p>delete ", and the SMS should be visible in all aspects of operations"</p> <p>Justification: does not make sense</p>
response	<p>Partially accepted</p> <p>The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.</p>
comment	<p>2187 comment by: <i>Flughafen Klagenfurt</i></p> <p>(a) define "visible"</p>
response	<p>Partially accepted</p> <p>The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.</p>
comment	<p>2219 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>remove", and the SMS should be visible in all aspects of operations", makes no sense.</p>
response	<p>Partially accepted</p> <p>The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.</p>
comment	<p>2450 comment by: <i>Isavia</i></p> <p>AMC1.ADR.OR.D.005 (b) (9) (a). Delete ", and the SMS should be visible in all aspects of operations".</p>
response	<p>Partially accepted</p> <p>The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.</p>
comment	<p>2532 comment by: <i>ADV -German Airports Association</i></p> <p>AMC1.ADR.OR.D.005 (b) (9) (a)</p> <p>delete ", and the SMS should be visible in all aspects of operations"</p> <p>Justification: does not make sense</p>

response Partially accepted
The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

comment 2543 comment by: *MST / STR - Stuttgart Airport*
AMC1.ADR.OR.D.005 (b) (9) (a)
delete ", and the SMS should be visible in all aspects of operations"
Justification:
does not make sense

response Partially accepted
The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.005(b)(9) –
Management – SAFETY COMMUNICATION** p. 91-92

comment 343 ❖ comment by: *Avinor*
AMC1.ADR.OR.D.005 (b) (9) (a). Delete ", and the SMS should be visible in all aspects of operations". The sentence does not make sense.

response Partially accepted
The text, which is based on ICAO Doc 9859, aimed at emphasising the need for safety communication. The text has been reworded.

comment 703 comment by: *Flughafen Düsseldorf GmbH*
Es ist fraglich, ob eine unkritische Übernahme aus einer Richtlinie (DOC 9859) hier sinnvoll ist. Diese hätte zunächst auf ihre Praktikabilität und Plausibilität überprüft werden müssen.

response Accepted
The text of the relevant Guidance Material is based on ICAO safety management manual (Doc 9859). Reference to ICAO Doc 9859 has been removed.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(b)(10) –
Management – COORDINATION OF THE AERODROME EMERGENCY
RESPONSE PLAN** p. 92

comment 704 comment by: *Flughafen Düsseldorf GmbH*
Die Schnittstelle ist eher theoretisch. Der Emergency Response Plan

	<p>enthält viele weitere Aspekte die mit einer reinen Flugbetriebssicherheit wenig zu tun haben (z. B. Räumung des Terminals).</p>
response	<p>Noted</p> <p>Annex 14 contains a safety management system requirement on the coordination of emergency response planning, while it contains also a requirement for the continuous improvement of the safety management system and its elements as such. The relevant AMC addresses this issue, while paragraph (b) has now been turned into Guidance Material.</p>
comment	<p>1084 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>Comment applies to both sub-paragraphs (a) and (b)</p> <p>There is no requirement for "continuous improvement" in the corresponding IR. Suggest amend IR and AMC to align.</p>
response	<p>Noted</p> <p>The draft rules contain a requirement for the continuous improvement of the safety management system and its elements as such. Therefore, the Agency believes that there is no need for repeating this requirement in the AMC.</p>
comment	<p>1299 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• AMC/GM to ANNEX II - Part-OR - AMC1-ADR.OR.D.005(b)(10) – Management (p92) <p><u>2. Justification and proposed text / comment</u></p> <p>This specification should be degraded in GM, or deleted as it does not bring any added value. In the particular case it increases confusion of the regulation layout and duplicates the intent of the specification in IR/ADR-OPS.B.005 (3) with a different wording.</p>
response	<p>Partially accepted</p> <p>Annex 14 contains a safety management system requirement on the coordination of emergency response planning, while it contains also a requirement for the continuous improvement of the safety management system and its elements as such. The relevant AMC addresses this issue; thus, the Agency does not share the view that there is a duplication of the relevant provisions, while paragraph (b) of the AMC has now been turned into Guidance Material.</p>
comment	<p>2064 comment by: <i>AENA - Aeropuertos Españoles y Navegación Aérea</i></p> <p>This specification should be degraded in GM, or deleted as it does not bring any added value. In the particular case it increases confusion of the regulation layout and duplicates the intent of the specification in IR/ADR-</p>

	OPS.B.005 (3) with a different wording.
response	Partially accepted Annex 14 contains a safety management system requirement on the coordination of emergency response planning, while it contains also a requirement for the continuous improvement of the safety management system and its elements as such. The relevant AMC addresses this issue; thus, the Agency does not share the view that there is a duplication of the relevant provisions, while paragraph (b) of the AMC has now been turned into Guidance Material.
comment	2101 comment by: <i>HIA - Highlands and Islands Airports Limited</i> D.005 (b) (10) (b) Emergency Response Plan - Agree with the item regarding full or partial exercises.
response	Noted

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(c) – Management p. 92
– AERODROME OPERATOR MANAGEMENT SYSTEM DOCUMENTATION

comment	705 comment by: <i>Flughafen Düsseldorf GmbH</i> a) 8) Es muss definiert werden, was mit "safety management system output" gemeint ist.
response	Noted
comment	1085 comment by: <i>NATS National Air Traffic Services Limited</i> There are two AMC to ADR.OR.D.005(c) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the two AMC into a single AMC.
response	Noted

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC2-ADR.OR.D.005(c) – Management p. 93
– AERODROME OPERATOR SAFETY MANAGEMENT MANUAL

comment	706 comment by: <i>Flughafen Düsseldorf GmbH</i> Es muss deutlich werden, dass nicht zwingend ein Dokument erstellt werden muss, damit die Pflege von gleichen Inhalten in unterschiedlichen Dokumenten verhindert werden kann (AM, FBO u. ä.)
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	<p>b) 10) Wenn der emergency response plan hier dazu gehört, stellt sich die Frage, warum dieser nicht Aufgabe des safety managers ist. Widerspruch!</p>
response	<p>Noted</p> <p>The role of the safety manager is described in ADR.OR.D.015 and the related AMC.</p>
comment	<p>1086 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>There are two AMC to ADR.OR.D.005(c) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the two AMC into a single AMC.</p>
response	<p>Noted</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.005(d) – Management – COMPLIANCE MONITORING – GENERAL</p>	<p>p. 93-94</p>
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comment	<p>538 comment by: <i>Flughafen Düsseldorf GmbH</i></p> <p>Hierfür kann nicht der Safety Manager zuständig sein. Das muss deutlich werden, um Diskussionen zu vermeiden und die rechtlichen Grundlagen zu wahren.</p> <p>Es muss zusätzlich zum SMS ein Compliance Beauftragter geschaffen werden, der kontinuierlich die Flughafenprozesse mit den rechtlichen Vorgaben abgleicht (eigentlich müsste man dafür einen Juristen einstellen). Viele Tätigkeiten überschneiden sich allerdings mit denen des Safety Managers. Für alle Airports wäre dies mit mehr Kosten verbunden, wobei der generierbare Nutzen fraglich ist.</p> <p>Compliance Monitoring ist weder im Annex 14, noch in dem DOC 9859 oder der EU-RL 1108/2009 zu finden. Mit der Phrase „and any other applicable requirements“ wird hier eher der Bezug zur Rechtskonformität als der Abgleich mit safety-relevanten Prozessen initiiert. Auch ist unklar in wie fern der Flughafen die Verantwortung der Rechtskonformität für vertraglich vergebene Verfahren haben sollte (sub-contracted). Da mehr und mehr Unternehmen die Compliance im Sinne von "Anti-Korruptions-Beauftragten" sehen dieses Aufgabenfeld genauer zu definieren um etwaige Verwechslungen auszuschließen.</p>
response	<p>Noted</p> <p>This AMC is a description of the compliance monitoring and the relevant activities, and not of the roles of the safety manager and the compliance monitoring manager, which are described in the relevant requirements</p>

and the related AMC. Compliance monitoring is an assurance process of the management system, which should be implemented irrespectively of the size of the aerodrome operator.
The phase 'and any other applicable requirements', covers the application of other aviation safety related requirements (e.g. rules of the air, requirements related to the Annex Vb of the Basic Regulation, etc.).
The Agency believes that the relevant requirements and AMC, which have been reviewed and amended provide enough flexibility for all types of aerodromes.

comment

829

comment by: *Airport Nuremberg - NUE/EDDN*

It must be defined more clearly, that compliance monitoring and managing as described in this AMC is not within the responsibility of the safety manager to avoid misunderstandings, discussions and to protect the legal basics regarding that matter. Parallel to the safety management the aerodrome has to implement a compliance management, which continuously aligns the legal requirements with the practiced proceedings at the airport (ideally with a judicial background). This is again for smaller and medium sized aerodromes a large disadvantage with more effort while being cost intensive. This should be moved to guidance material, especially since neither national legislation nor ICAO requirements and guidelines demand any of that.

response

Noted

This AMC is a description of the compliance monitoring and the relevant activities, and not of the roles of the safety manager and the compliance monitoring manager, which are described in the relevant requirements and the related AMC. Compliance monitoring is an assurance process of the management system, which should be implemented irrespectively of the size of the aerodrome operator.
The phase 'and any other applicable requirements' covers the application of other aviation safety related requirements (e.g. rules of the air, requirements related to the Annex Vb of the Basic Regulation, etc.).
The Agency believes that the relevant requirements and AMC, which have been reviewed and amended provide enough flexibility for all types of aerodromes.

comment

1087

comment by: *NATS National Air Traffic Services Limited*

There are four AMC to ADR.OR.D.005(d) which are not four different ways of satisfying the IR, rather all must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the four AMC into a single AMC.

response

Accepted

The Agency has reviewed and merged the relevant AMC.

comment

1545

comment by: *Flughafen Graz Betriebs GmbH*

Hierfür kann nicht der Safety Manager zuständig sein. Das muss deutlich werden, um Diskussionen zu vermeiden und die rechtlichen Grundlagen zu wahren. Hier muss zusätzlich zum SMS ein Compliance Beauftragter geschaffen werden, der kontinuierlich die Flughafenprozesse mit den rechtlichen Vorgaben abgleicht (eigentlich müsste man dafür einen Juristen einstellen). Viele Tätigkeiten überschneiden sich allerdings mit denen des Safety Managers → Wiedermal für kleine und mittelgroße Airports mehr Kosten verbunden mit einem geringen Nutzen.

Compliance Monitoring ist weder im Annex 14, dem DOC 9859 und der EU-RL 1108/2009 zu finden. Mit der Phrase „and any other applicable requirements“ wird hier eher der Bezug zur Rechtskonformität als der Abgleich mit safety-relevanten Prozessen initiiert. Auch ist unklar in wie fern der Flughafen die Verantwortung der Rechtskonformität für vertraglich vergebene Verfahren haben sollte (sub-contracted).

Da mehr und mehr Unternehmen die Compliance im Sinne von ‚Anti-Korruptions-Beauftragten‘ sehen dieses Aufgabenfeld genauer zu definieren um etwaige Verwechslungen auszuschließen.

response

Noted

This AMC is a description of the compliance monitoring and the relevant activities, and not of the roles of the safety manager and the compliance monitoring manager, which are described in the relevant requirements and the related AMC. Compliance monitoring is an assurance process of the management system, which should be implemented irrespectively of the size of the aerodrome operator.

The phrase ‘and any other applicable requirements’, covers the application of other aviation safety related requirements (e.g. rules of the air, requirements related to the Annex Vb of the Basic Regulation, etc.).

The Agency believes that the relevant requirements and AMC, which have been reviewed and amended, provide enough flexibility for all types of aerodromes.

comment

2526

comment by: *ADV -German Airports Association*

AMC1-ADR.OR.D.005(d) – Management

COMPLIANCE MONITORING GENERAL

(a) The implementation and use of a compliance monitoring function should enable the aerodrome operator to monitor compliance with the relevant requirements of this Part, Part-ADR.OPS and any other applicable requirements.

(1) The aerodrome operator should specify the basic structure of the compliance monitoring function applicable to the activities conducted;

(2) The compliance monitoring function should be structured according to the size of organisation and the complexity of the activities to be monitored, including those which have been sub-contracted.

(b) An aerodrome operator should monitor compliance with the procedures it has designed to ensure safe activities. In doing so, an aerodrome operator should as a minimum, and where appropriate, monitor:

(1) organisational structure;

(2) plans and objectives;

(3) privileges of the organisation;

- (4) manuals, logs and records;
- (5) training standards;
- (6) required resources; and
- (7) management system.

The reporting of such third parties should be done irrespectively of any other requirements according to which they have to report to the competent authority of the aerodrome or the state of registry of the aircraft involved, or any other competent authority in the context of the national occurrence reporting programme.

Hierfür kann nicht der Safety Manager zuständig sein. Das muss deutlich werden, um Diskussionen zu vermeiden und die rechtlichen Grundlagen zu wahren. Hier muss zusätzlich zum SMS ein Compliance Beauftragter geschaffen werden, der kontinuierlich die Flughafenprozesse mit den rechtlichen Vorgaben abgleicht (eigentlich müsste man dafür einen Juristen einstellen). Viele Tätigkeiten überschneiden sich allerdings mit denen des Safety Managers ◊ Wiedermal für kleine und mittelgroße Airports mehr Kosten verbunden mit einem geringen Nutzen.

Compliance Monitoring ist weder im Annex 14, dem DOC 9859 und der EU-RL 1108/2009 zu finden. Mit der Phrase „and any other applicable requirements“ wird hier eher der Bezug zur Rechtskonformität als der Abgleich mit safety-relevanten Prozessen initiiert. Auch ist unklar in wie fern der Flughafen die Verantwortung der Rechtskonformität für vertraglich vergebene Verfahren haben sollte (sub-contracted).

Da mehr und mehr Unternehmen die Compliance im Sinne von ‚Anti-Korruptions-Beauftragten‘ sehen dieses Aufgabenfeld genauer zu definieren um etwaige Verwechslungen auszuschließen.

response

Noted

This AMC is a description of the compliance monitoring and the relevant activities, and not of the roles of the safety manager and the compliance monitoring manager, which are described in the relevant requirements and the related AMC. Compliance monitoring is an assurance process of the management system, which should be implemented irrespectively of the size of the aerodrome operator.

The phase ‘and any other applicable requirements’, covers the application of other aviation safety related requirements (e.g. rules of the air, requirements related to the Annex Vb of the Basic Regulation, etc.).

The Agency believes that the relevant requirements and AMC, which have been reviewed and amended, provide enough flexibility for all types of aerodromes.

comment

2557

comment by: MST / STR - Stuttgart Airport

AMC1-ADR.OR.D.005(d) – Management

COMPLIANCE MONITORING GENERAL

(a) The implementation and use of a compliance monitoring function should enable the aerodrome operator to monitor compliance with the relevant requirements of this Part, Part-ADR.OPS and any other applicable requirements.

(1) The aerodrome operator should specify the basic structure of the compliance monitoring function applicable to the activities conducted;

(2) The compliance monitoring function should be structured according to the size of organisation and the complexity of the activities to be

monitored, including those which have been sub-contracted.
(b) An aerodrome operator should monitor compliance with the procedures it has designed to ensure safe activities. In doing so, an aerodrome operator should as a minimum, and where appropriate, monitor:
(1) organisational structure;
(2) plans and objectives;
(3) privileges of the organisation;
(4) manuals, logs and records;
(5) training standards;
(6) required resources; and
(7) management system.
The reporting of such third parties should be done irrespectively of any other requirements according to which they have to report to the competent authority of the aerodrome or the state of registry of the aircraft involved, or any other competent authority in the context of the national occurrence reporting programme.

Hierfür kann nicht der Safety Manager zuständig sein. Das muss deutlich werden, um Diskussionen zu vermeiden und die rechtlichen Grundlagen zu wahren. Hier muss zusätzlich zum SMS ein Compliance Beauftragter geschaffen werden, der kontinuierlich die Flughafenprozesse mit den rechtlichen Vorgaben abgleicht (eigentlich müsste man dafür einen Juristen einstellen). Viele Tätigkeiten überschneiden sich allerdings mit denen des Safety Managers → Wiedermal für kleine und mittelgroße Airports mehr Kosten verbunden mit einem geringen Nutzen.
Compliance Monitoring ist weder im Annex 14, dem DOC 9859 und der EU-RL 1108/2009 zu finden. Mit der Phrase „and any other applicable requirements“ wird hier eher der Bezug zur Rechtskonformität als der Abgleich mit safety-relevanten Prozessen initiiert. Auch ist unklar in wie fern der Flughafen die Verantwortung der Rechtskonformität für vertraglich vergebene Verfahren haben sollte (sub-contracted).
Da mehr und mehr Unternehmen die Compliance im Sinne von ‚Anti-Korruptions-Beauftragten‘ sehen dieses Aufgabenfeld genauer zu definieren um etwaige Verwechslungen auszuschließen.

response

Noted

This AMC is a description of the compliance monitoring and the relevant activities, and not of the roles of the safety manager and the compliance monitoring manager, which are described in the relevant requirements and the related AMC. Compliance monitoring is an assurance process of the management system, which should be implemented irrespectively of the size of the aerodrome operator.
The phrase ‘and any other applicable requirements’, covers the application of other aviation safety related requirements (e.g. rules of the air, requirements related to the Annex Vb of the Basic Regulation, etc.).
The Agency believes that the relevant requirements and AMC, which have been reviewed and amended, provide enough flexibility for all types of aerodromes.

comment

2624

comment by: *ADV Arbeitsgemeinschaft Deutscher Verkehrsflughäfen*

AMC1-ADR.OR.D.005(d) – Management

COMPLIANCE MONITORING GENERAL

Hierfür kann nicht der Safety Manager zuständig sein. Das muss deutlich werden, um Diskussionen zu vermeiden und die rechtlichen Grundlagen zu wahren. Hier muss zusätzlich zum SMS ein Compliance Beauftragter geschaffen werden, der kontinuierlich die Flughafenprozesse mit den rechtlichen Vorgaben abgleicht (eigentlich müsste man dafür einen Juristen einstellen). Viele Tätigkeiten überschneiden sich allerdings mit denen des Safety Managers → Wiedermal für kleine und mittelgroße Airports mehr Kosten verbunden mit einem geringen Nutzen.

Compliance Monitoring ist weder im Annex 14, dem DOC 9859 und der EU-RL 1108/2009 zu finden. Mit der Phrase „and any other applicable requirements“ wird hier eher der Bezug zur Rechtskonformität als der Abgleich mit safety-relevanten Prozessen initiiert. Auch ist unklar in wie fern der Flughafen die Verantwortung der Rechtskonformität für vertraglich vergebene Verfahren haben sollte (sub-contracted).

Da mehr und mehr Unternehmen die Compliance im Sinne von ‚Anti-Korruptions-Beauftragten‘ sehen dieses Aufgabenfeld genauer zu definieren um etwaige Verwechslungen auszuschließen.

response

Noted

This AMC is a description of the compliance monitoring and the relevant activities, and not of the roles of the safety manager and the compliance monitoring manager, which are described in the relevant requirements and the related AMC. Compliance monitoring is an assurance process of the management system, which should be implemented irrespectively of the size of the aerodrome operator.

The phrase ‘and any other applicable requirements’, covers the application of other aviation safety related requirements (e.g. rules of the air, requirements related to the Annex Vb of the Basic Regulation, etc.).

The Agency believes that the relevant requirements and AMC, which have been reviewed and amended, provide enough flexibility for all types of aerodromes.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC2-ADR.OR.D.005(d) – Management p. 94
– COMPLIANCE MONITORING DOCUMENTATION

comment

1088

comment by: *NATS National Air Traffic Services Limited*

There are four AMC to ADR.OR.D.005(d) which are not four different ways of satisfying the IR, rather all must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the four AMC into a single AMC.

response

Accepted

The Agency has reviewed and merged the relevant AMC.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC3-ADR.OR.D.005(d) – Management p. 95
– COMPLIANCE MONITORING – STAFFING

comment 1024 comment by: *Swedish Regional Airport Association*
12 month should only be valid for new airport certificat. Add "safety" before aspects.

response Noted
The Agency understands that this comment is on AMC4-ADR.OR.D.005(d) The 12-month period applies for the certificates that will be issued in accordance with the relevant Implementing Rule. The Agency believes that there is no need to indicate that compliance monitoring is about the safety aspects of an aerodrome and its operation, given the scope of the proposed Implementing Rules and, therefore, the related AMC.

comment 1089 comment by: *NATS National Air Traffic Services Limited*
There are four AMC to ADR.OR.D.005(d) which are not four different ways of satisfying the IR, rather all must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the four AMC into a single AMC.

response Accepted
The Agency has reviewed and merged the relevant AMC.

comment 1374 comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM to ANNEX II - Part-OR - AMC3-ADR.OR.D.005(d) – Management - *STAFFING* (p95)

2. Justification and proposed text / comment

AMC3-ADR.OR.D.005(d) is totally not applicable in practice, even for big organizations.

Compliance monitoring requires expertise in each area that will be verified (infrastructure, RFF, wildlife, etc.). An organization can only be expected to monitor compliance, but absolutely not to have experts in each of these domains and to make them work in the area of the activity which is to be audited. Indeed this would require having at least two experts in each domain, one to do the work and one to check that the other does it in compliance with regulation.

DGAC proposes to delete paragraph (a) of AMC3-ADR.OR.D.005(d) and to add the content of GM1-ADR.OR.D.015(b) in this AMC "Depending on the size of the organisation and the type and complexity of operations" (see below).

Furthermore this AMC is more closely related to ADR.OR.D.015 than to ADR.OR.D.005.

AMC32-ADR.OR.D.005(d) 015(b) – Management—Personnel requirements

"COMPLIANCE MONITORING – STAFFING

Depending on the size of the organisation and the type and complexity of operations, the compliance monitoring function may be exercised by the accountable manager or other independent means.

Auditors used for compliance monitoring audits and inspections should meet the following criteria:

(a) should not have involvement in the area of the activity which is to be audited;

(b) should have relevant operational and/or maintenance experience or other appropriate experience;

(c) external auditors used, should be familiar with the type of operation, maintenance or other activities of the aerodrome operator."

response

Partially accepted

The Agency has reviewed the content of GM1-ADR.OR.D.015(b) and incorporated it, to the extent necessary, in the new AMC, while the reviewed AMC1-ADR.OR.D.005(d) and the new GM added provide the necessary flexibility.

Moreover, independence and objectivity are amongst the necessary qualities required for the successful and effective implementation of compliance monitoring, therefore, necessitating that audits and inspections are carried out by competent personnel not responsible for the function, procedure etc. being audited, is also a necessary quality.

comment

1664

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX II - Part-OR – AMC3-ADR.OR.D.005(d) – Management - STAFFING (p95)

2. Justification and proposed text / comment

AMC3-ADR.OR.D.005(d) is totally not applicable in practice, even for big organizations.

Compliance monitoring requires expertise in each area that will be verified (infrastructure, RFF, wildlife, etc.). An organization can only be expected to monitor compliance, but absolutely not to have experts in each of these domains and to make them work in the area of the activity which is to be audited. Indeed this would require having at least two experts in each domain, one to do the work and one to check that the other does it in compliance with regulation.

DGAC proposes to delete paragraph (a) of AMC3-ADR.OR.D.005(d) and to add the content of GM1-ADR.OR.D.015(b) in this AMC "Depending on the size of the organisation and the type and complexity of operations" (see below).

Furthermore this AMC is more closely related to ADR.OR.D.015 than to ADR.OR.D.005.

AMC32-ADR.OR.D.005(d) 015(b) – Management—Personnel requirements

"COMPLIANCE MONITORING – STAFFING

Depending on the size of the organisation and the type and complexity of

operations, the compliance monitoring function may be exercised by the accountable manager or other independent means.
Auditors used for compliance monitoring audits and inspections should meet the following criteria:
(a) should not have involvement in the area of the activity which is to be audited;
(b) should have relevant operational and/or maintenance experience or other appropriate experience;
(c) external auditors used, should be familiar with the type of operation, maintenance or other activities of the aerodrome operator."

response Partially accepted

The Agency has reviewed the content of GM1-ADR.OR.D.015(b) and incorporated it, to the extent necessary, in the new AMC, while the reviewed AMC1-ADR.OR.D.005(d) and the new GM added provide the necessary flexibility.
Moreover, independence and objectivity are amongst the necessary qualities required for the successful and effective implementation of compliance monitoring, therefore, necessitating that audits and inspections are carried out by competent personnel not responsible for the function, procedure etc. being audited, is also a necessary quality.

comment

2065 comment by: AENA - Aeropuertos Españoles y Navegación Aérea

AMC3-ADR.OR.D.005(d) is totally not applicable in practice, even for big organizations.
Compliance monitoring requires expertise in each area that will be verified (infrastructure, RFF, wildlife, etc.). An organization can only be expected to monitor compliance, but absolutely not to have experts in each of these domains and to make them work in the area of the activity which is to be audited. Indeed this would require having at least two experts in each domain, one to do the work and one to check that the other does it in compliance with regulation.
It is proposed to delete paragraph (a) of AMC3-ADR.OR.D.005(d) and to add the content of GM1-ADR.OR.D.015(b) in this AMC "Depending on the size of the organisation and the type and complexity of operations" (see below).

Furthermore this AMC is more closely related to ADR.OR.D.015 than to ADR.OR.D.005.

AMC3-ADR.OR.D.005(d) 015(b) – Management Personnel requirements

"COMPLIANCE MONITORING – STAFFING

Depending on the size of the organisation and the type and complexity of operations, the compliance monitoring function may be exercised by the accountable manager or other independent means.

Auditors used for compliance monitoring audits and inspections should meet the following criteria:

(a) should not have involvement in the area of the activity which is to be audited;

(b) should have relevant operational and/or maintenance experience or other appropriate experience;

(c) external auditors used, should be familiar with the type of operation, maintenance or other activities of the aerodrome operator."

response Partially accepted

The Agency has reviewed the content of GM1-ADR.OR.D.015(b) and incorporated it, to the extent necessary, in the new AMC, while the reviewed AMC1-ADR.OR.D.005(d) and the new GM added provide the necessary flexibility.
Moreover, independence and objectivity are amongst the necessary qualities required for the successful and effective implementation of compliance monitoring, therefore, necessitating that audits and inspections are carried out by competent personnel not responsible for the function, procedure, etc. being audited, is also a necessary quality.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC4-ADR.OR.D.005(d) – Management p. 95
– COMPLIANCE MONITORING – AUDIT SCHEDULING**

comment 164 comment by: *Swedavia AB - Swedish airports (currently 11 airports)*

Under para b, desirable to extend the period to 48 months to harmonize with AMC1-ADR.AR.C.010.

response Noted

The Agency believes that 36 months is an adequate period, since there should be time given to the competent authority to adjust its oversight cycle and to cover the cases where its oversight cycle has been set at 48 months.

comment 1025 comment by: *Swedish Regional Airport Association*

12 month should only be valid for new airport certificat. Add "safety" before aspects.

response Noted

The 12-month period applies for the certificates that will be issued in accordance with the relevant Implementing Rule. The Agency believes that there is no need to indicate that compliance monitoring is about the safety aspects of an aerodrome and its operation, given the scope of the proposed Implementing Rules and, therefore, the related AMC.

comment 1090 comment by: *NATS National Air Traffic Services Limited*

There are four AMC to ADR.OR.D.005(d) which are not four different ways of satisfying the IR, rather all must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the four AMC into a single AMC.

response Accepted
The Agency has merged the relevant AMC.

comment 1378 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX II - Part-OR – AMC4-ADR.OR.D.005(d) – Management – *COMPLIANCE MONITORING – AUDIT SCHEDULING* (p95)

2. Justification and proposed text / comment
Before the issuance of the certificate, the aerodrome operator has had to demonstrate its compliance with regulation. In order to do this, it already has audited all aspects of the aerodrome and its operation. For this reason, it is useless to perform these tasks again within the first 12 months since the date of the issuance of the certificate. It is proposed to remove this sentence in AMC4-ADR.OR.D.005(d).

AMC4-ADR.OR.D.005(d) – Management
"COMPLIANCE MONITORING – AUDIT SCHEDULING
[...]
(b) An aerodrome operator should establish a schedule of audits to be completed during a specified calendar period. ~~All aspects of the aerodrome and its operation should be audited within the first 12 months since the date of the issuance of the certificate.~~ After that, an audit or a series of audits should be conducted within a maximum period of 36 months, to cover the whole aerodrome and its operation in a manner and at intervals set out in the aerodrome manual, unless the competent authority requires further audits."

response Noted
The Agency has the view that risk-based oversight largely depends on the proper functioning of the aerodrome management system itself, while relevant evidence will allow the competent authority to define its own appropriate auditing/inspection intervals.

comment 1665 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX II - Part-OR – AMC4-ADR.OR.D.005(d) – Management – *COMPLIANCE MONITORING – AUDIT SCHEDULING* (p95)

2. Justification and proposed text / comment
Before the issuance of the certificate, the aerodrome operator has had to demonstrate its compliance with regulation. In order to do this, it already has audited all aspects of the aerodrome and its operation. For this reason, it is useless to perform these tasks again within the first 12 months since the date of the issuance of the certificate. It is proposed to remove this sentence in AMC4-ADR.OR.D.005(d).

AMC4-ADR.OR.D.005(d) – Management

"COMPLIANCE MONITORING – AUDIT SCHEDULING

[...]

(b) An aerodrome operator should establish a schedule of audits to be completed during a specified calendar period. ~~All aspects of the aerodrome and its operation should be audited within the first 12 months since the date of the issuance of the certificate.~~ After that, an audit or a series of audits should be conducted within a maximum period of 36 months, to cover the whole aerodrome and its operation in a manner and at intervals set out in the aerodrome manual, unless the competent authority requires further audits."

response

Noted

The Agency has the view that risk-based oversight largely depends on the proper functioning of the aerodrome management system itself, while relevant evidence will allow the competent authority to define its own appropriate auditing/inspection intervals.

comment

2066

comment by: AENA - Aeropuertos Españoles y Navegación Aérea

Before the issuance of the certificate, the aerodrome operator has had to demonstrate its compliance with regulation. In order to do this, it already has audited all aspects of the aerodrome and its operation. For this reason, it is useless to perform these tasks again within the first 12 months since the date of the issuance of the certificate. It is proposed to remove this sentence in AMC4-ADR.OR.D.005(d).

AMC4-ADR.OR.D.005(d) – Management

"COMPLIANCE MONITORING – AUDIT SCHEDULING

[...]

(b) An aerodrome operator should establish a schedule of audits to be completed during a specified calendar period. ~~All aspects of the aerodrome and its operation should be audited within the first 12 months since the date of the issuance of the certificate.~~ After that, an audit or a series of audits should be conducted within a maximum period of ~~36~~ 60 months, to cover the whole aerodrome and its operation in a manner and at intervals set out in the aerodrome manual, unless the competent authority requires further audits."

response

Noted

The Agency has the view that risk-based oversight largely depends on the proper functioning of the aerodrome management system itself, whose proper functioning will allow the competent authority to define its own appropriate auditing/inspection intervals. Defining audit schedules which extend beyond the maximum oversight planning cycle foreseen for competent authorities, will not enable the latter to properly discharge their responsibilities.

comment

2326

comment by: Norwich International Airport

AMC.ADR>OR>D.oo5 (d) (b)

To expect all aspects of the aerodrome and its operation to be audited

	<p>within the first 12 months after the date of the issuance of the certificate is too onerous.</p> <p>Change to a maximum of 36 months.</p>
response	<p>Noted</p> <p>The Agency has the view that risk-based oversight largely depends on the proper functioning of the aerodrome management system itself, while relevant evidence will allow the competent authority to define its own appropriate auditing/inspection intervals.</p>

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.010 – Contracted activities – COMPLIANCE MONITORING RESPONSIBILITY WHEN CONTRACTING ACTIVITIES	p. 95-96
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comment	<p>1091 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>AMC1-ADR.OR.D.010 (a) - This is a statement and does not contain a "should" so it should be GM. Suggest change it to be GM.</p>
response	<p>Noted</p> <p>An AMC should not always contain the verb 'should' in order to qualify as an AMC.</p>

comment	<p>2161 comment by: <i>Vereinigung der Dienstleister an Deutschen Flughäfen e.V. (VDF)</i></p> <p>Again the question arises if the ground handling providers who have an approval according to the proposal for a regulation of the European Parliament and of the Council on ground handling services at Union airports and repealing Council Directive 96/67/EC are seen as contracted third parties.</p>
response	<p>Noted</p> <p>EASA follows the relevant works on the amendment of the relevant EU law in the area of ground handling. However, the criterion to be applied in such cases should not be if the contracted organisation holds an approval, but what the nature of the contracted activity is.</p>

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.015(a) – Personnel requirements – ACCOUNTABLE MANAGER	p. 96
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comment	<p>1092 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>There are two AMC to ADR.OR.D.015(a) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how</p>
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	could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merge the two AMC into a single AMC.
response	Accepted The two AMC have been merged.
comment	1655 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i> It isn't clear if the accountable manager is equal to the CEO and / or the operational manager.
response	Accepted As stated in the relevant Implementing Rule, the accountable manager is a person 'who has the authority for ensuring that all activities can be financed and carried out in accordance with the applicable requirements. The accountable manager shall be responsible for establishing and maintaining an effective management system'. This person could also have an operational role, but, in any case, the above requirements should be met. The Agency has added Guidance Material GM1-ADR.OR.D.015(a), which is based on ICAO Doc 9859, to further clarify the issue.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC2-ADR.OR.D.015(a) – Personnel p. 96-97 requirements – ACCOUNTABLE MANAGER

comment	1093 comment by: <i>NATS National Air Traffic Services Limited</i> AMC2-ADR.OR.D.015(a) (a) - It is unclear which "paragraph (c)" is being referred to, suggest a rewrite to specify this.
response	Accepted Paragraph (a) refers to the paragraph (c) that follows. The text has been amended, thus, this reference has been removed.
comment	1094 comment by: <i>NATS National Air Traffic Services Limited</i> With regards to paragraphs (b) and (c) - These are statements and do not contain a "should" so should be GM. Suggest change these to be GM.
response	Noted The relevant parts of the AMC provide an option for the aerodrome operator to comply with the requirement, and, therefore, they qualify as AMC text. It is not always necessary to use the verb 'should' in an AMC.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM2-ADR.OR.D.015(a) – Personnel p. 97-98

requirements – OPERATIONS MANAGEMENT

comment 117 comment by: *Zürich Airport*
GM2-ADR.OR.D.015(a)(3) reduce Personnel requirements to acceptable level
As proposed this will end up in a huge amount of data without any safety benefit (data cemetery)

response Accepted
The relevant Guidance Material has been removed, as all operational items are to be contained in Part OPS.

comment 134 comment by: *CAA-NL*
We suggest to add after (4) a new (5) 'assessment of the runway conditions in adverse weather conditions'.

response Noted
The relevant Guidance Material has been removed, as all operational items are to be contained in Part OPS.

comment 520 comment by: *CTIF The International Fire and Rescue Organization - Airport Commission*
Airport have to make a plan for aircraft removal

response Noted
The relevant Guidance Material has been removed. However, the Agency has added relevant Guidance Material in Part ADR.OPS.

comment 659 comment by: *BAA Glasgow*
(1) The plan should be commensurate with the types of risks likely from aircraft operations and any other activity conducted at the aerodrome or in its vicinity.

response Noted
The relevant Guidance Material has been removed, as all operational items are to be contained in Part OPS.

comment 660 comment by: *BAA Glasgow*
(4) Remove the word **checking**, as this implies that the provision is present, rather than using the word **testing**, which would imply that the provision has been functionally operated.

response Noted
The relevant Guidance Material has been removed, as all operational items

are to be contained in Part OPS.

comment 1095 comment by: *NATS National Air Traffic Services Limited*

As there is no GM1-ADR.OR.D.015(a) then this GM should be GM1. None of the GM appears to be relevant to ADR.OR.D.015(a).

response Noted

The relevant Guidance Material has been removed, as all operational items are to be contained in Part OPS.

comment 1253 comment by: *UK CAA*

Page No: 97

Paragraph No: GM2-ADR.OR.D.015 (a) Emergency Plan Management, (a)(2)

Comment: The guidance should recognise the role of the aerodrome in co-ordinating the plan rather than imposing it.

Justification: The guidance needs to promote the co-ordination role of the aerodrome operator in developing the plan. In the UK the aerodrome operator cannot implement the plan without co-operation of third parties.

Proposed Text: ... " ground handling services providers and Local/State Authorities in **developing and** implementing the aerodrome emergency plan;"

response *Noted*

The relevant Guidance Material has been removed, as all operational items are to be contained in Part OPS.

comment 2639 comment by: *Fraport AG*

GM2-ADR.OR.D.015(a) — Personnel requirements
QUALITY AND SECURITY MANAGEMENT FOR AERONAUTICAL DATA AND
AERONAUTICAL INFORMATION PROVISION ACTIVITIES

Editorial

Complete paragraph

Delete complete paragraph

Fraport AG
Requirement already addressed in Article 7 and 10 of (EU) No 73/2010.
Proposal is to delete this, to avoid duplication in regulation

response Accepted

The relevant Guidance Material has been removed, as all operational items are to be contained in Part OPS.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.015(b) – Personnel requirements – COMPLIANCE MONITORING** p. 98-99

comment 16 comment by: *ACI EUROPE - Airports Council International*
needs to be on the same level as GM1.ADR.OR.D.015 (b)
Justification: make both consistent

response Noted
The Agency considers that the relevant text should be at AMC level, thus, the relevant Guidance Material has been incorporated in the AMC, allowing, however, for the necessary flexibility and proportionality.

comment 17 comment by: *ACI EUROPE - Airports Council International*
needs to be on the same level as AMC1.ADR.OR.D.015 (b)
Justification: make both consistent

response Partially accepted
The Agency understands that this comment refers to GM1-ADR.OR.D.015(b). This GM text will be reworded and be included in the relevant AMC to reflect the case of less complex aerodrome operators.

comment 106 comment by: *CAA Norway*
We do not agree to the possibility in AMC1-ADR.OR.D.015(b), (a) on page 98 to nominate more than one person as QA Manager. Group of persons for this position is not acceptable in a serious management organisation.

response Accepted
This AMC, as well as the other AMC relevant to the compliance monitoring, has been amended in this direction, while flexibility and proportionality is ensured for the case of less complex aerodrome operators.

comment 344 comment by: *Avinor*
AMC1.ADR.OR.D.015 (b). Needs to be on the same level as GM1.ADR.OR.D.015 (b) to make both consistent.

response Noted
The Agency considers that the relevant text should be at AMC level, thus, the relevant Guidance Material has been incorporated in the AMC, allowing, however, for the necessary flexibility and proportionality.

comment 431 comment by: *Estonian CAA*
We do not agree to the possibility in AMC1-ADR.OR.D.015(b), (a) on page

	<p>98 to nominate more than one person as QA Manager. Group of persons for this position is not acceptable in a serious management organisation.</p>						
response	<p>Accepted</p> <p>This AMC, as well as the other AMC relevant to the compliance monitoring has been amended in this direction, while flexibility and proportionality is ensured for the case of less complex aerodrome operators.</p>						
comment	<p>472 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>We do not agree to the possibility in AMC1-ADR.OR.D.015(b), (a) on page 98 to nominate more than one person as QA Manager. Group of persons for this position is not acceptable in a serious management organisation.</p>						
response	<p>Accepted</p> <p>This AMC, as well as the other AMC relevant to the compliance monitoring, has been amended in this direction, while flexibility and proportionality is ensured for the case of less complex aerodrome operators.</p>						
comment	<p>707 comment by: <i>Flughafen Düsseldorf GmbH</i></p> <p>Hierfür kann nicht der Safety Manager zuständig sein. Das muss deutlich werden, um Diskussionen zu vermeiden und die rechtlichen Grundlagen zu wahren.</p>						
response	<p>Noted</p> <p>Compliance monitoring is an assurance process of the aerodrome operator's management system. Moreover, the text of the AMC has been amended so that in the case of less complex aerodrome operators, this task could also be performed by other persons.</p>						
comment	<p>764 comment by: <i>ADP : Aeroports de Paris</i></p> <table border="1" data-bbox="383 1388 1388 2016"> <tr> <td data-bbox="383 1388 798 1500">Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)</td> <td data-bbox="798 1388 1388 1500">Personnel requirements COMPLIANCE MONITORING</td> </tr> <tr> <td data-bbox="383 1500 798 1635">Proposition/commentaire</td> <td data-bbox="798 1500 1388 1635">(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).</td> </tr> <tr> <td data-bbox="383 1635 798 2016">Justification</td> <td data-bbox="798 1635 1388 2016">Le fait de devoir nommer une ou plusieurs personnes indépendantes pour exercer la fonction de "compliance monitoring manager" risque de mettre en difficulté les petits aérodromes. En effet, dans l'arrêté français SGS, des aménagements sont possibles pour les petits aérodromes: il peut s'agir de quelqu'un qui a des fonctions opérationnelles (ex: responsable maintenance) donc pas complètement</td> </tr> </table>	Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)	Personnel requirements COMPLIANCE MONITORING	Proposition/commentaire	(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).	Justification	Le fait de devoir nommer une ou plusieurs personnes indépendantes pour exercer la fonction de "compliance monitoring manager" risque de mettre en difficulté les petits aérodromes. En effet, dans l'arrêté français SGS, des aménagements sont possibles pour les petits aérodromes: il peut s'agir de quelqu'un qui a des fonctions opérationnelles (ex: responsable maintenance) donc pas complètement
Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)	Personnel requirements COMPLIANCE MONITORING						
Proposition/commentaire	(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).						
Justification	Le fait de devoir nommer une ou plusieurs personnes indépendantes pour exercer la fonction de "compliance monitoring manager" risque de mettre en difficulté les petits aérodromes. En effet, dans l'arrêté français SGS, des aménagements sont possibles pour les petits aérodromes: il peut s'agir de quelqu'un qui a des fonctions opérationnelles (ex: responsable maintenance) donc pas complètement						

	<p>indépendant et qui rend compte au dirigeant responsable. Le fait d'insérer le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b) viendrait assouplir le principe de l'AMC et offrir des solutions organisationnelles supplémentaires aux petits aérodromes.</p>
Traduction de courtoisie	<p>We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).</p> <p>The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager. The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.</p>
response	<p>Partially accepted</p> <p>The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.</p>
comment	<p>810 comment by: <i>Finnish Transport Safety Agency</i></p> <p>We do not agree to the possibility in AMC1-ADR.OR.D.015(b), (a) on page 98 to nominate more than one person as QA Manager. Group of persons for this position is not acceptable in a serious management organisation.</p>
response	<p>Accepted</p> <p>This AMC, as well as the other AMC relevant to the compliance monitoring, has been amended in this direction, while flexibility and proportionality is ensured for the case of less complex aerodrome operators.</p>
comment	<p>895 comment by: <i>Union des Aéroports français - UAF</i></p> <p>Attachment #118</p> <p>UAF NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)</p>

	<p>Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b) Personnel requirements COMPLIANCE MONITORING</p> <p>Traduction de courtoisie We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b). The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager. The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.</p>
response	<p>Partially accepted</p> <p>The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.</p>
comment	<p>1010 comment by: MST / STR - Stuttgart Airport</p> <ul style="list-style-type: none"> • Es werden weitere Anforderungen geregelt, für die es so bislang keine Referenz gab. • Es bleibt unklar, ob diese Compliance-Funktion sozusagen "in Personalunion" vom SMS-Beauftragten übernommen werden könnte bzw. dort angesiedelt werden kann. Es macht keinen Sinn, zusätzliche (Compliance-) Parallelstrukturen zu schaffen. Dies wäre weder organisatorisch sinnvoll noch ressourcenmäßig zu realisieren. • Dies sollte klargestellt werden. • Denn gemeint sein können hier nicht "Compliance" Strukturen in dem Sinne, wie sie in den letzten Jahren verstärkt in Unternehmen entstanden sind. Hier standen bislang vor allem Themen wie "Anti-Korruption", "Kartellrecht" uvm. im Vordergrund. Die hier vorgesehene (EASA) Compliance Funktion kann sich jedoch naturgemäß nur auf den Safety-Kontext beziehen. • Herkömmliche Compliance Strukturen können insbesondere das (Safety-) Compliance Monitoring nicht in gleicher Weise übernehmen.
response	<p>Noted</p> <p>Paragraph (a) of the relevant AMC1-ADR.OR.D.005(5) states that 'a compliance monitoring function should enable the aerodrome operator to</p>

monitor compliance with the relevant requirements of this Part, Part-ADR.OPS and any other applicable requirement'. The content of the AMC should be read through the prism of the Agency's competences. Moreover, the text of the AMC has been amended so that in the case of less complex aerodrome operators, this task could also be performed by other persons.

comment 1096 comment by: *NATS National Air Traffic Services Limited*

This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.

response Noted

comment 1341 comment by: *Euroairport Bâle-Mulhouse*

Attachment [#119](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)

Référence: AMC1-ADR.OR.D.015(b) et
 GM1-ADR.OR.D.015(b)

Personnel requirements
 COMPLIANCE MONITORING

Traduction de courtoisie
 We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).
 The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager. The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.

response Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.

comment 1437 comment by: *Swedish Transport Agency*

We do not agree to the possibility in AMC1-ADR.OR.D.015(b), (a) on page 98 to nominate more than one person as QA Manager. Group of persons for this position is not acceptable in a serious management organisation.

response Accepted

This AMC, as well as the other AMC relevant to the compliance

monitoring,has been amended in this direction, while flexibility and proportionality is ensured for the case of less complex aerodrome operators.

comment 1487 comment by: *Cologne/Bonn Airport*
 this compliance monitoring officer is not covered by ICAO

response Noted
 Compliance monitoring is an assurance process of the aerodrome operator's management system.

comment 1537 comment by: *Geneva International Airport (ROMIG)*
 This article should be GM, not AMC as it makes more sense to have this article and GM1.ADR.OR.D.015 (b) on the same level.

response Noted
 The Agency considers that the relevant text should be at AMC level, thus, the relevant Guidance Material has been incorporated in the AMC, allowing, howeve,r for the necessary flexibility and proportionality.

comment 1656 comment by: *Flughafen Linz-Hörsching - LNZ/LOWL*
 Is the compliance manager clarified as jurisdictional responsible person or as the operational manager?

Especially for small airports it would be necessary to use personal union within the several responsibilities (safety sanager, compliance manager, operational service and maintainance manager).

response Noted
 Compliance monitoring is an assurance process of the aerodrome operator's management system.

comment 1701 comment by: *Aéroport de Marseille - MRS/LFML*
 We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).

The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty.
 Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager.
 The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.

response Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.

comment

1837

comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#120](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)

Référence: AMC1-ADR.OR.D.015(b) et
GM1-ADR.OR.D.015(b)
Personnel requirements
COMPLIANCE MONITORING

Traduction de courtoisie
We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).

The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager. The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.

response

Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.

comment

1915

comment by: *Pau Pyrénées Airport - PUF/LFBP*

We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).

The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager. The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.

response

Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one

compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.

comment

1939 comment by: *ADBAM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#121](#)

ADBAM - NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)

Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)
Personnel requirements
COMPLIANCE MONITORING

Traduction de courtoisie
We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).
The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager. The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.

response

Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.

comment

1987 comment by: *Munich Airport International*

needs to be on the same level as GM1.ADR.OR.D.015 (b)

Justification: make both consistent

response

Noted

The Agency considers that the relevant text should be at AMC level, thus, the relevant Guidance Material has been incorporated in the AMC, allowing, however, for the necessary flexibility and proportionality.

comment

2218 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*

change to GM, consistency with the following GM

response

Noted

The Agency considers that the relevant text should be at AMC level, thus, the relevant Guidance Material has been incorporated in the AMC,

allowing, however, for the necessary flexibility and proportionality.

,comment

2377

comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

<p>Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)</p>	<p>Personnel requirements COMPLIANCE MONITORING</p>
<p>Proposition/commentaire</p>	<p>(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).</p>
<p>Justification</p>	<p>Le fait de devoir nommer une ou plusieurs personnes indépendantes pour exercer la fonction de "compliance monitoring manager" risque de mettre en difficulté les petits aérodromes. En effet, dans l'arrêté français SGS, des aménagements sont possibles pour les petits aérodromes: il peut s'agir de quelqu'un qui a des fonctions opérationnelles (ex: responsable maintenance) donc pas complètement indépendant et qui rend compte au dirigeant responsable. Le fait d'insérer le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b) viendrait assouplir le principe de l'AMC et offrir des solutions organisationnelles supplémentaires aux petits aérodromes.</p>
<p>Traduction de courtoisie</p>	<p>We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).</p> <p>The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager. The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.</p>

response

Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.

comment	2533	comment by: <i>ADV -German Airports Association</i>
	AMC1.ADR.OR.D.015 (b) needs to be on the same level as GM1.ADR.OR.D.015 (b)	
	Justification: make both consistent	
response	Noted	
	The Agency considers that the relevant text should be at AMC level, thus the relevant Guidance Material has been incorporated in the AMC, allowing however for the necessary flexibility and proportionality.	

comment	2544	comment by: <i>MST / STR - Stuttgart Airport</i>
	AMC1.ADR.OR.D.015 (b) needs to be on the same level as GM1.ADR.OR.D.015 (b)	
	Justification: make both consistent	
response	Noted	
	The Agency considers that the relevant text should be at AMC level, thus the relevant Guidance Material has been incorporated in the AMC, allowing however for the necessary flexibility and proportionality.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.015(b) – Personnel requirements – COMPLIANCE MONITORING	p. 99
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comment	274	comment by: <i>Manchester Airport plc</i>
	It may be more consistent for the national authority (CAA) to set out qualification requirements	
response	Noted	

comment	295	comment by: <i>CAA Austria - Ministry of Transport</i>
	Are there any defined criteria for the compliance monitoring if he can or can not be operational manager or safety manager?	
response	Accepted	
	The text of this Guidance Material has been reworded and has been included in the relevant AMC foreseeing also other possible ways of compliance. In any case, the independence of the compliance monitoring	

should be established.

comment	345 comment by: <i>Avinor</i> GM1.ADR.OR.D.015 (b). Needs to be on the same level as AMC1.ADR.OR.D.015 (b) to make both consistent.
response	Accepted

comment	594 comment by: <i>Exeter International Airport</i> AMC1-ADR.OR.D.015(b) (c) (2) - At smaller organisations it is not practical for roles to be independent of line management. It should be for the aerodrome operator to justify management structure.
response	Partially accepted The Agency agrees that the aerodrome operator is responsible to establish and justify an organisational structure that meets its needs. However, the independence of the compliance monitoring should be established. GM1-ADR.OR.D.015(b), has been reworded and incorporated in the relevant AMC, foreseeing also other possible ways of compliance.

comment	764 ❖ comment by: <i>ADP : Aeroports de Paris</i>								
	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)</td> <td>Personnel requirements COMPLIANCE MONITORING</td> </tr> <tr> <td>Proposition/commentaire</td> <td>(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).</td> </tr> <tr> <td>Justification</td> <td>Le fait de devoir nommer une ou plusieurs personnes indépendantes pour exercer la fonction de "compliance monitoring manager" risque de mettre en difficulté les petits aérodromes. En effet, dans l'arrêté français SGS, des aménagements sont possibles pour les petits aérodromes: il peut s'agir de quelqu'un qui a des fonctions opérationnelles (ex: responsable maintenance) donc pas complètement indépendant et qui rend compte au dirigeant responsable. Le fait d'insérer le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b) viendrait assouplir le principe de l'AMC et offrir des solutions organisationnelles supplémentaires aux petits aérodromes.</td> </tr> <tr> <td>Traduction de courtoisie</td> <td>We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-</td> </tr> </table>	Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)	Personnel requirements COMPLIANCE MONITORING	Proposition/commentaire	(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).	Justification	Le fait de devoir nommer une ou plusieurs personnes indépendantes pour exercer la fonction de "compliance monitoring manager" risque de mettre en difficulté les petits aérodromes. En effet, dans l'arrêté français SGS, des aménagements sont possibles pour les petits aérodromes: il peut s'agir de quelqu'un qui a des fonctions opérationnelles (ex: responsable maintenance) donc pas complètement indépendant et qui rend compte au dirigeant responsable. Le fait d'insérer le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b) viendrait assouplir le principe de l'AMC et offrir des solutions organisationnelles supplémentaires aux petits aérodromes.	Traduction de courtoisie	We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-
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Proposition/commentaire	(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).								
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Traduction de courtoisie	We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-								

	<p>ADR.OR.D.015(b).</p> <p>The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager.</p> <p>The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.</p>
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response Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.

comment *1593* comment by: *Aéroport de Marseille - MRS/LFML*

We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).

The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager.

The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.

response Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.

comment *1916* comment by: *Pau Pyrénées Airport - PUF/LFBP*

We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).

	<p>The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager. The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.</p>						
response	<p>Partially accepted</p> <p>The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring should be established.</p>						
comment	<p>1988 comment by: <i>Munich Airport International</i></p> <p>needs to be on the same level as AMC1.ADR.OR.D.015 (b)</p> <p>Justification: make both consistent</p>						
response	<p>Partially accepted</p> <p>The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC, foreseeing other possible ways of compliance.</p>						
comment	<p>2346 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(b) Comment: It may be more consistent for the national authority (CAA) to set out qualification requirements</p>						
response	<p>Noted</p> <p>The Agency cannot relate this comment to the content of this Guidance Material, and, therefore, cannot provide an answer.</p>						
comment	<p>2378 comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i></p> <table border="1" data-bbox="383 1496 1398 2018"> <tr> <td data-bbox="383 1496 798 1608">Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)</td> <td data-bbox="798 1496 1398 1608">Personnel requirements COMPLIANCE MONITORING</td> </tr> <tr> <td data-bbox="383 1608 798 1747">Proposition/commentaire</td> <td data-bbox="798 1608 1398 1747">(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).</td> </tr> <tr> <td data-bbox="383 1747 798 2018">Justification</td> <td data-bbox="798 1747 1398 2018">Le fait de devoir nommer une ou plusieurs personnes indépendantes pour exercer la fonction de "compliance monitoring manager" risque de mettre en difficulté les petits aérodromes. En effet, dans l'arrêté français SGS, des aménagements sont possibles pour les petits aérodromes: il peut s'agir de</td> </tr> </table>	Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)	Personnel requirements COMPLIANCE MONITORING	Proposition/commentaire	(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).	Justification	Le fait de devoir nommer une ou plusieurs personnes indépendantes pour exercer la fonction de "compliance monitoring manager" risque de mettre en difficulté les petits aérodromes. En effet, dans l'arrêté français SGS, des aménagements sont possibles pour les petits aérodromes: il peut s'agir de
Référence: AMC1-ADR.OR.D.015(b) et GM1-ADR.OR.D.015(b)	Personnel requirements COMPLIANCE MONITORING						
Proposition/commentaire	(a) Nous proposons d'inclure le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b).						
Justification	Le fait de devoir nommer une ou plusieurs personnes indépendantes pour exercer la fonction de "compliance monitoring manager" risque de mettre en difficulté les petits aérodromes. En effet, dans l'arrêté français SGS, des aménagements sont possibles pour les petits aérodromes: il peut s'agir de						

	<p>quelqu'un qui a des fonctions opérationnelles (ex: responsable maintenance) donc pas complètement indépendant et qui rend compte au dirigeant responsable. Le fait d'insérer le GM1-ADR.OR.D.015(b) dans l'AMC1-ADR.OR.D.015(b) viendrait assouplir le principe de l'AMC et offrir des solutions organisationnelles supplémentaires aux petits aérodromes.</p>
Traduction de courtoisie	<p>We propose to include the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b).</p> <p>The fact to have to nominate one or several compliance monitoring manager(s) may put small aerodromes in difficulty. Indeed, in the French "arrêté SGS", adjustments are possible for small aerodromes: this manager can be somebody who have operational responsibilities (ex: maintenance manager). So it can be somebody who is not totally independent and who reports to the accountable manager. The fact to insert the GM1-ADR.OR.D.015(b) in the AMC1-ADR.OR.D.015(b) would make the AMC principle more flexible and it would offer additional organisational solutions for small aerodromes.</p>

response Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC. There is no need to nominate more than one compliance monitoring manager. In any case, the independence of the compliance monitoring function should be established.

comment 2534 comment by: *ADV -German Airports Association*

GM1.ADR.OR.D.015 (b)
needs to be on the same level as AMC1.ADR.OR.D.015 (b)

Justification:
make both consistent

response Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC, foreseeing other possible ways of compliance.

comment 2545 comment by: *MST / STR - Stuttgart Airport*

GM1.ADR.OR.D.015 (b)

needs to be on the same level as AMC1.ADR.OR.D.015 (b)

Justification:
make both consistent

response Partially accepted

The text of GM1-ADR.OR.D.015(b) has been reworded and has been included in the relevant AMC, foreseeing other possible ways of compliance.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART
D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.015(c) –
Personnel requirements – SAFETY MANAGEMENT**

p. 99-100

comment 107 comment by: *CAA Norway*
We do not agree to the possibility in AMC1-ADR.OR.D.015(c), (a) on page 99 to nominate more than one person as Safety Manager. Group of persons for this position is not acceptable in a serious management organisation.

response Accepted
The AMC has been amended in this direction.

comment 432 comment by: *Estonian CAA*
We do not agree to the possibility in AMC1-ADR.OR.D.015(c), (a) on page 99 to nominate more than one person as Safety Manager. Group of persons for this position is not acceptable in a serious management organisation.

response Accepted
The AMC has been amended in this direction.

comment 473 comment by: *Icelandic Civil Aviation Administration*
We do not agree to the possibility in AMC1-ADR.OR.D.015(c), (a) on page 99 to nominate more than one person as Safety Manager. Group of persons for this position is not acceptable in a serious management organisation.

response Accepted
The AMC has been amended in this direction.

comment 708 comment by: *Flughafen Düsseldorf GmbH*
Entsprechend der vorherigen Kommentaren könnte der "emergency response plan" hier ergänzt werden.

response *Noted*

comment *812* comment by: *Finnish Transport Safety Agency*
We do not agree to the possibility in AMC1-ADR.OR.D.015(c), (a) on page 99 to nominate more than one person as Safety Manager. Group of persons for this position is not acceptable in a serious management organisation.

response Accepted
The AMC has been amended in this direction.

comment *1254* comment by: *UK CAA*

Page No: 100

Paragraph No: AMC1-ADR.OR.D.015(c) item (c)

Comment: The personnel requirements for the safety manager are too prescriptive and do not properly reflect the role as they confuse safety management aerodrome wide with aerodrome operations. The tasks identified in (b) do not complement the skill set identified in (c). Therefore paragraphs (c) (3) and (4) should be deleted.

Justification: In practice, the safety manager will have exposure to all aspects of an aerodrome (e.g. construction, office health & safety, building services).

Proposed Text: Paragraphs (c) (3) and (4) should be deleted.

response Noted
The Agency considers that the AMC is not prescriptive. In particular, paragraph (b) addresses the key functions of the safety manager, and has been developed on the basis of the content of the ICAO Doc 9859 (appointment of key safety personnel).
Moreover, the Agency considers also that the safety manager should have knowledge of the aerodrome manual and of the applicable requirements in the area of aerodromes.

comment *1438* comment by: *Swedish Transport Agency*

We do not agree to the possibility in AMC1-ADR.OR.D.015(c), (a) on page 99 to nominate more than one person as QA Manager. Group of persons for this position is not acceptable in a serious management organisation.

response Accepted
The AMC has been amended in this direction.

requirements – SAFETY MANAGEMENT

comment 293 comment by: *CAA Austria - Ministry of Transport*
Are there any defined criteria for the safety manager if he can or cannot be operational manager, aerodrome manager or accountable manager for independence reasons?

response Accepted
The Agency has reviewed this Guidance Material whose content has been reworded and included in AMC1-ADR.OR. D.005(b)(1) in order to cover the cases of less complex aerodrome operators. Moreover, AMC1-ADR.OR.D.015(c)(2) (former AMC1-ADR.OR.D.015(c)) has been reworded in this direction.

comment 595 comment by: *Exeter International Airport*
GM1-ADR.OR.D.015(c) - The organisation of safety management needs to be justified by the aerodrome operator. Further guidance should be provided as to what "sufficiency independence" is?

response *Accepted*
The purpose of the relevant requirements and AMC is not to prescribe a specific organisational structure. It is for the aerodrome operator to identify an organisational structure and management system that fits its size and complexity of operations, and to demonstrate its suitability to the competent authority. Moreover, the Agency has reviewed this Guidance Material whose content has been reworded and included in AMC1-ADR.OR. D.005(b)(1) while AMC1-ADR.OR.D.015(c)(2) (former AMC1-ADR.OR.D.015(c)) has been reworded.

comment 597 comment by: *Brussels Airport - BRU/EBBR*
ADR.OR.D.015(c)
GM-ADR.OR.D.015(c)

To add Guidance Material for the personnel requirements, more specific for the Safety Manager.

I suggest to add one Guidance Material based on Appendix 2 of Chapter 8 from ICAO Doc 9859 SMM : "Sample Job Description for a Safety Manager", similar to

what is done in GM1-ADR.OR.D.005(b)(2) : SAFETY POLICY en GM2-ADR.OR.D.005(b)(2) : EXAMPLE SAFETY POLICY.

So I suggest to add : GM2-ADR.OR.D.015(c) – Personnel requirements : SAFETY MANAGEMENT – EXAMPLE JOB DESCRIPTION SAFETY MANAGER : followed by the text from the sample job description for a safety manager as mentioned in Appendix 2 of Chapter 8, ICAO Doc 9859.

response Noted
The Agency considers that the existing text is sufficient for the purpose.

comment

869 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.B.005 (a) (2) — Management System (p20)
- AMC/GM to ANNEX I — Part-AR — GM2-ADR.AR.B.005 ~~AR-200(a)~~ — Management system (p10)
- ANNEX II - Part-OR - ADR.OR.D.015 — Personnel requirements (p51-52)
- ANNEX II - Part-OR - ADR.OR.D.035 — Record keeping (p55)
- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.D.015(e) — Personnel requirements (p100)
- AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.D.015 ~~AR200(e)~~ — Personnel requirements (p100)
- ANNEX III — Part-OPS - ADR-OPS.B.010 (a)(3) — Rescue and fire-fighting services (p65)
- AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS. B.055 — Fuel quality (p160)
- ANNEX III — Part-OPS —ADR-OPS.B.060 — Access to the movement area (p67-68)

2. Justification and proposed text / comment

This comment is linked with comment 1120 in book I.

This comment is critical, as this is linked to an important European directive, it would be very stringent to implement it and the specifications quoted contradict themselves.

All personnel do not have to receive a “qualification”, as such a system is very stringent and would induce administrative burden, due to the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions. **This word (“qualification”) should not be used with the meaning of the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications.**

All personnel do not have to receive a “qualification”, as such a system is very stringent and would induce administrative burden, due to the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions and it is very stringent.

However, it seems to be the meaning used here as specified in **AMC1-ADR.OR.D.015(e)**.

What is to be evaluated is the competency of people (including their training, their diploma, their skills). Training is generally adapted to the competency: some provisions use “competency” (which is adequate) and some others use “qualification”.

Moreover, those specifications are not consistent as, for instance, GM2-ADR.AR.B.005 ~~AR-200(a)~~ which contradicts GM3-ADR.AR.B.005 (a)(2) which says that the aim is to ensure “personnel remain competent”.

GM2-ADR.AR.B.005 ~~AR-200(a)~~ includes a non-adequate definition, and

even say that "qualification does not necessarily imply competence", which is wrong.

It is consequently asked to delete references to "qualifications", which is an important remark from France, and to replace it by "competency". It is asked to delete references to the European directive, and to revise GM2-ADR.AR.B.005 AR.200(a) and GM3-ADR.AR.B.005 which define these words.

Proposal:

"ADR.AR.B.005 – Management system

(a) [...]

(2) [...] *Such personnel shall be ~~qualified~~ **competent** to perform their allocated tasks [...]"*

"GM2-ADR.AR.B.005 AR.200(a)(2) – Management system

~~QUALIFICATION~~ **COMPETENCY OF PERSONNEL**

*The term ~~qualification~~ **competency** denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree.*

~~Qualification~~ *It could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.*

~~Qualification does not necessarily imply competence.~~

Certain posts may by nature be associated with the possession of certain qualifications in a specific field (e.g. civil or electrical engineering, wildlife biology etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or community legislation."

"ADR.OR.D.015 – Personnel requirements

[...]

(d) *The aerodrome operator shall have sufficient and ~~qualified~~ **competent** personnel fir the planned tasks and activities to be performed in accordance with the applicable requirements.*

(e) *The aerodrome operator shall maintain appropriate qualification, if relevant, and training records [...]"*

"ADR.OR.D.035 – Record-keeping

[...]

(d) [...]

(5) *personnel training, qualifications, if relevant, and medical records [...]"*

"AMC1-ADR.OR.D.015(e) – Personnel requirements

DETERMINATION OF PERSONNEL NEEDS AND QUALIFICATIONS

(a) [...]

(b) *The aerodrome operator should determine the required **competencies** ~~qualifications~~, in accordance with the applicable requirements (and the national and European Union legislation where this is applicable, ~~for qualifications~~), and include them in the aerodrome manual. A documented system with defined responsibilities should be in place, in order to identify any needs for changes with regard to personnel qualifications ~~and/or competency~~."*

"GM1-ADR.OR.D.015 AR200(e) – Personnel requirements

QUALIFICATION COMPETENCY OF PERSONNEL

The term ~~qualification~~ **competency** denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree. ~~Qualification~~ **It** could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.

~~Qualification does not necessarily imply competence.~~

Certain posts may by nature be associated with the possession of certain qualifications in a specific field (e.g. rescue and fire-fighting, civil, mechanical or electrical engineering, wildlife biology etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or European Union legislation."

ADR-OPS.B.010 – Rescue and fire-fighting services

"(a) [...]

(3) rescue and fire-fighting personnel are properly trained and equipped ~~and qualified to operate in the aerodrome environment without prejudice to the system and legal provisions of the relevant Member State;~~

[...]"

AMC-ADR-OPS.B.055 – Fuel quality (linked with comment n°908 on responsibilities)

"(a) Without prejudice to the system and legal provisions of the relevant Member State, ~~t~~The aerodrome operator should ensure, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, ~~implement~~ **have** procedures to:

[...]

(4) Use adequately ~~qualified and trained~~ staff in storing, dispensing and otherwise handling fuel on the aerodrome."

response

Noted

The Agency cannot relate the content of this comment to the content of the relevant Guidance Material, and, therefore cannot provide an answer. In any case, the term 'qualified' is already used in the Basic Regulation.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.015(d) – Personnel
requirements – AERODROME MANAGER**

p. 100

comment

108

comment by: CAA Norway

Editorial: The name of AMC1-ADR.OR.D.015 (d) on page 100 is not correct, should be called: AMC1-ADR.OR.D.015(b)(1) as it is about Aerodrome Manager.
And please have consistency in the use of names for different positions.

response

Accepted

The title of the AMC and the relevant text have been reviewed and

amended, based on the changes made to the relevant Implementing Rule.

comment	294	comment by: <i>CAA Austria - Ministry of Transport</i>
	The term "aerodrome manager" has to be clarified in respect to Draft cover regulation - ANNEX I - Part AR - APPENDIX II, For certification a aerodorme manager is not needed? Are their any defined critiria for the aerodrome manager if he can or can not be operational manager or saftey manager?	
response	Accepted The Agency has reviewed the text of the relevant AMC and removed the term 'aerodrome manager' based on the amendments made in the relevant Implementing Rule. The relevant AMC provides the possibility for the combination of the nominated persons.	
comment	474	comment by: <i>Icelandic Civil Aviation Administration</i>
	Editorial: The name of AMC1-ADR.OR.D.015 (d) on page 100 is not correct, should be called: AMC1-ADR.OR.D.015(b)(1) as it is about Aerodrome Manager. And please have constency in the use of names for different positions.	
response	Accepted The title of the AMC and the relevant text have been reviewed and amended, based on the changes made to the relevant Implementing Rule.	
comment	813	comment by: <i>Finnish Transport Safety Agency</i>
	Editorial: The name of AMC1-ADR.OR.D.015 (d) on page 100 is not correct, should be called: AMC1-ADR.OR.D.015(b)(1) as it is about Aerodrome Manager. And please have constency in the use of names for different positions.	
response	Accepted The title of the AMC and the relevant text have been reviewed and amended, based on the changes made to the relevant Implementing Rule.	
comment	1097	comment by: <i>NATS National Air Traffic Services Limited</i>
	The related IR uses the term "aerodrome operator" rather than "aerodrome manager".	
response	Accepted The title of the AMC and the relevant text have been reviewed and amended, based on the changes made to the relevant Implementing Rule.	
comment	1383	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u>	

- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.D.015(δb) — Personnel requirements – *AERODROME MANAGER* (p100)

2. Justification and proposed text / comment

In the title, "aerodrome manager" is used, but the corresponding IR deals with "operational manager".

Moreover, this AMC seems to be linked to paragraph (b), and not (d), of ADR.OR.D.015.

Consequently, it is proposed to modify ADR.OR.D.015 as follows :

"AMC1-ADR.OR.D.015(δb) — Personnel requirements

AERODROME OPERATIONAL MANAGER

[...]"

response Partially accepted

The Agency agrees about the discrepancy between the subtitle of the AMC and the wording of the relevant Implementing Rule, as well as the wrong number of the AMC. However, based on the changes made to the relevant Implementing Rule, its content has been reworded and it has also been given a different, more generic, title.

comment 1439 comment by: *Swedish Transport Agency*

Editorial: The name of AMC1-ADR.OR.D.015 (d) on page 100 is not correct, should be called: AMC1-ADR.OR.D.015(b)(1) as it is about Aerodrome Manager. And please have consistency in the use of names for different positions.

response Accepted

The title of the AMC and the relevant text have been reviewed and amended, based on the changes made to the relevant Implementing Rule.

comment 1670 comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.D.015(δb) — Personnel requirements – *AERODROME MANAGER* (p100)

2. Justification and proposed text / comment

In the title, "aerodrome manager" is used, but the corresponding IR deals with "operational manager".

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Consequently, it is proposed to modify ADR.OR.D.015 as follows :

"AMC1-ADR.OR.D.015(δb) — Personnel requirements

AERODROME OPERATIONAL MANAGER

[...]"

response Partially accepted

The Agency agrees about the discrepancy between the subtitle of the AMC and the wording of the relevant Implementing Rule, as well as the wrong number of the AMC. However, based on the changes made to the relevant

Implementing Rule, its content has been reworded and it has also been given a different, more generic, title.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.015(e) – Personnel
requirements – DETERMINATION OF PERSONNEL NEEDS AND
QUALIFICATIONS** p. 100

comment 273 comment by: *Manchester Airport plc*
It may be more consistent for the national authority (CAA) to set out qualification requirements in an AMC.

response Noted
The use of alternative AMC, in accordance with the provisions of the relevant Implementing Rules, is also possible. However, it is for the aerodrome operator to establish the level of qualifications/competence for the various posts of its organisation.

comment 661 comment by: *BAA Glasgow*
(b) It may be prudent to allow NAA's to determine the qualifications in line with any national requirements.

response *Noted*
The use of alternative AMC, in accordance with the provisions of the relevant Implementing Rules, is also possible. However, it is for the aerodrome operator to establish the level of qualifications/competence for the various posts of its organisation.

comment 869 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX I - Part-AR - ADR.AR.B.005 (a) (2) – Management System (p20)
- AMC/GM to ANNEX I – Part-AR – GM2-ADR.AR.B.005 AR-200(a) – Management system (p10)
- ANNEX II - Part-OR - ADR.OR.D.015 – Personnel requirements (p51-52)
- ANNEX II - Part-OR - ADR.OR.D.035 – Record keeping (p55)
- AMC/GM to ANNEX II – Part-OR – AMC1-ADR.OR.D.015(e) – Personnel requirements (p100)
- AMC/GM to ANNEX II – Part-OR – GM1-ADR.OR.D.015 AR200(e) – Personnel requirements (p100)
- ANNEX III – Part-OPS - ADR-OPS.B.010 (a)(3) – Rescue and fire-fighting services (p65)
- AMC/GM to ANNEX III – Part-OPS –AMC-ADR-OPS. B.055 – Fuel quality (p160)
- ANNEX III – Part-OPS –ADR-OPS.B.060 – Access to the

movement area (p67-68)

2. Justification and proposed text / comment

This comment is linked with comment 1120 in book I.

This comment is critical, as this is linked to an important European directive, it would be very stringent to implement it and the specifications quoted contradict themselves.

All personnel do not have to receive a "qualification", as such a system is very stringent and would induce administrative burden, due to the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions. **This word ("qualification") should not be used with the meaning of the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications.**

All personnel do not have to receive a "qualification", as such a system is very stringent and would induce administrative burden, due to the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions and it is very stringent.

However, it seems to be the meaning used here as specified in **AMC1-ADR.OR.D.015(e)**.

What is to be evaluated is the competency of people (including their training, their diploma, their skills). Training is generally adapted to the competency: some provisions use "competency" (which is adequate) and some others use "qualification".

Moreover, those specifications are not consistent as, for instance, GM2-ADR.AR.B.005 AR.200(a) which contradicts GM3-ADR.AR.B.005 (a)(2) which says that the aim is to ensure "personnel remain competent".

GM2-ADR.AR.B.005 AR.200(a) includes a non-adequate definition, and even say that "qualification does not necessarily imply competence", which is wrong.

It is consequently asked to delete references to "qualifications", which is an important remark from France, and to replace it by "competency". It is asked to delete references to the European directive, and to revise GM2-ADR.AR.B.005 AR.200(a) and GM3-ADR.AR.B.005 which define these words.

Proposal:

"ADR.AR.B.005 – Management system

(a) [...]

(2) [...] *Such personnel shall be ~~qualified~~ **competent** to perform their allocated tasks [...]*"

"GM2-ADR.AR.B.005 AR.200(a)(2) – Management system

~~QUALIFICATION~~ **COMPETENCY OF PERSONNEL**

*The term ~~qualification~~ **competency** denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required*

training, or acquisition of a diploma or degree.

~~Qualification~~ It could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.

~~Qualification does not necessarily imply competence.~~

Certain posts may by nature be associated with the possession of certain qualifications in a specific field (e.g. civil or electrical engineering, wildlife biology etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or community legislation."

"ADR.OR.D.015 – Personnel requirements

[...]

(d) The aerodrome operator shall have sufficient and ~~qualified~~ **competent** personnel for the planned tasks and activities to be performed in accordance with the applicable requirements.

(e) The aerodrome operator shall maintain appropriate qualification, **if relevant**, and training records [...]"

"ADR.OR.D.035 – Record-keeping

[...]

(d) [...]

(5) personnel training, qualifications, **if relevant**, and medical records [...]"

"AMC1-ADR.OR.D.015(e) – Personnel requirements

DETERMINATION OF PERSONNEL NEEDS AND QUALIFICATIONS

(a) [...]

(b) The aerodrome operator should determine the required **competencies** ~~qualifications~~, in accordance with the applicable requirements (and the national and European Union legislation where this is applicable, **for qualifications**), and include them in the aerodrome manual. A documented system with defined responsibilities should be in place, in order to identify any needs for changes with regard to personnel qualifications **and/or competency**."

"GM1-ADR.OR.D.015 AR200(e) – Personnel requirements

~~QUALIFICATION~~ **COMPETENCY** OF PERSONNEL

The term ~~qualification~~ **competency** denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree. ~~Qualification~~ It could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.

~~Qualification does not necessarily imply competence.~~

Certain posts may by nature be associated with the possession of certain qualifications in a specific field (e.g. rescue and fire-fighting, civil, mechanical or electrical engineering, wildlife biology etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or European Union legislation."

ADR-OPS.B.010 – Rescue and fire-fighting services

"(a) [...]

(3) rescue and fire-fighting personnel are properly trained **and** equipped

~~and qualified to operate in the aerodrome environment~~ without prejudice to the system and legal provisions of the relevant Member State; [...]"

AMC-ADR-OPS.B.055 – Fuel quality (linked with comment n°908 on responsibilities)

"(a) Without prejudice to the system and legal provisions of the relevant Member State, ~~t~~The aerodrome operator should ensure, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, ~~implement~~ have procedures to:

[...]

(4) Use adequately ~~qualified and~~ trained staff in storing, dispensing and otherwise handling fuel on the aerodrome."

response

Noted

The term 'qualified' is already used in the relevant essential requirements of Annex Va to the Basic Regulation. Moreover, the associated Guidance Material, further, elaborates the meaning of the term qualification.

comment

1098

comment by: NATS National Air Traffic Services Limited

AMC1-ADR.OR.D.015(e) (b) - This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement. Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.

response

Noted

comment

1256

comment by: UK CAA

Page No: 100

Paragraph No: AMC1-ADR.OR.D.015(e) item (b)

Comment: Qualification requirements are not something that needs to be in the aerodrome manual.

Justification: Qualification requirements are part of the aerodrome safety management system and should be contained in the SMS documentation. They are secondary to the aerodrome management and their place is in the management system.

Proposed Text: "The aerodrome operator should determine the required personnel qualifications, in accordance with the applicable requirements **and the national and European Union legislation where this is applicable**. A documented system with defined responsibilities should be in place".

response

Noted

The aerodrome manual is considered to contain or refer to other documents. The safety management manual is one of these documents. A different interpretation would mean that the safety management manual should always be a separate document which, however, is not the case.

comment 1910 comment by: *Dublin Airport Authority*
It may be more consistent for the competent authority to set out these requirements in an AMC.

response Noted
The use of alternative AMC, in accordance with the provisions of the relevant Implementing Rules, is also possible. However, it is for the aerodrome operator to establish the level of qualifications/competence for the various posts of its organisation.

comment 2350 comment by: *East Midlands Airport - EMA/EGNX*
(b) Delete "aerodrome operator".
Justification: It may be more consistent for the national authority (CAA) to set out qualification requirements

response Noted
The use of alternative AMC, in accordance with the provisions of the relevant Implementing Rules, is also possible. However, it is for the aerodrome operator to establish the level of qualifications/competence for the various posts of its organisation.

comment 2354 comment by: *Norwich International Airport*
GM1-ADR.OR.D.015.AR.200(e) – Personnel Requirements, Qualification of personnel
The term qualification denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree. Qualification could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status. Qualification does not necessarily imply competence.
It may be more consistent for the national authority (CAA) to set out qualification requirements in an AMC.

response Noted
The use of alternative AMC, in accordance with the provisions of the relevant Implementing Rules, is also possible. However, it is for the aerodrome operator to establish the level of qualifications/competence for the various posts of its organisation.

comment 2461 comment by: *DAA Cork Airport*

	(b) -It may be more consistent for the competent authority to set out these requirements in an AMC.
response	Noted The use of alternative AMC, in accordance with the provisions of the relevant Implementing Rules, is also possible. However, it is for the aerodrome operator to establish the level of qualifications/competence for the various posts of its organisation.

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM1-ADR. OR.D.015 AR.200(e) – Personnel requirements – QUALIFICATION OF PERSONNEL</p>	p. 100-101
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comment	347 GM1-ADR. OR.D.015 AR.200(e). Is this the correct numbering of this GM?	comment by: <i>Avinor</i>
response	Accepted The numbering of the AMC has been amended.	

comment	662 It may be prudent to allow the NAA's to determine how the level of qualification or competency should be determined. Ie, by the use of National Occupational Standards.	comment by: <i>BAA Glasgow</i>
response	Noted This Guidance Material does not intend to define how the level of qualification is determined, but rather to clarify what is the meaning of the term in the context of these rules. The use of alternative means of compliance is possible, in accordance with the provisions of the relevant Implementing Rules.	

comment	801 It may be more consistent for the competent authority to set out qualification requirements in an AMC.	comment by: <i>Dublin Airport Authority</i>
response	Noted This Guidance Material does not intend to define how the level of qualification is determined, but rather to clarify what is the meaning of the term in the context of these rules. The use of alternative means of compliance is possible, in accordance with the provisions of the relevant Implementing Rules.	

comment	1709 The term qualification denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or	comment by: <i>London Luton Airport Operations Ltd</i>
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	<p>acquisition of a diploma or degree. Qualification could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status. Qualification does not necessarily imply competence. It may be more consistent for the national authority (CAA) to set out qualification requirements in an AMC.</p>
response	<p>Noted</p> <p>This Guidance Material does not intend to define how the level of qualification is determined, but rather to clarify what is the meaning of the term in the context of these rules. The use of alternative means of compliance is possible, in accordance with the provisions of the relevant Implementing Rules.</p>
comment	<p>1911 comment by: <i>Dublin Airport Authority</i></p> <p>It may be more consistent for the competent authority to set out these requirements in an AMC.</p>
response	<p>Noted</p> <p>This Guidance Material does not intend to define how the level of qualification is determined, but rather to clarify what is the meaning of the term in the context of these rules. The use of alternative means of compliance is possible, in accordance with the provisions of the relevant Implementing Rules.</p>
comment	<p>2032 comment by: <i>Shannon Airport</i></p> <p>It may be more consistent for the competent authority to set out these requirements in an AMC.</p>
response	<p>Noted</p> <p>This Guidance Material does not intend to define how the level of qualification is determined, but rather to clarify what is the meaning of the term in the context of these rules. The use of alternative means of compliance is possible, in accordance with the provisions of the relevant Implementing Rules.</p>
comment	<p>2102 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>Fully agree that Qualification does not necessarily imply Competence.</p>
response	<p>Noted</p>
comment	<p>2233 comment by: <i>Glasgow Prestwick</i></p> <p>consider allowing adding 25% uncertified staff in RFFS who are working towards qualification</p>
response	<p>Noted</p>
comment	<p>2462 comment by: <i>DAA Cork Airport</i></p>

	<p>It may be more consistent for the competent authority to set out qualification requirements in an AMC.</p>
response	<p>Noted</p> <p>This Guidance Material does not intend to define how the level of qualification is determined, but rather to clarify what is the meaning of the term in the context of these rules. The use of alternative means of compliance is possible, in accordance with the provisions of the relevant Implementing Rules.</p>
comment	<p>2581 comment by: <i>LJL Airport - Liverpool John Lennon Airport</i></p> <p>GM1-ADR.OR.D.015.AR.200(e) – Personnel Requirements, Qualification of personnel</p> <p>The term qualification denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree. Qualification could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status. Qualification does not necessarily imply competence. It may be more consistent for the national authority (CAA) to set out qualification requirements in an AMC.</p>
response	<p>Noted</p> <p>This Guidance Material does not intend to define how the level of qualification is determined, but rather to clarify what is the meaning of the term in the context of these rules. The use of alternative means of compliance is possible, in accordance with the provisions of the relevant Implementing Rules.</p>
comment	<p>2585 comment by: <i>EAL AFS - Edinburgh Airport</i></p> <p>GM1-ADR.OR.D.015.AR.200(e) – Personnel Requirements, Qualification of personnel</p> <p>The term qualification denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree. Qualification could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status. Qualification does not necessarily imply competence. It may be more consistent for the national authority (CAA) to set out qualification requirements in an AMC.</p>
response	<p>Noted</p> <p>This Guidance Material does not intend to define how the level of qualification is determined, but rather to clarify what is the meaning of the term in the context of these rules. The use of alternative means of compliance is possible, in accordance with the provisions of the relevant Implementing Rules.</p>
comment	<p>2598 comment by: <i>Stansted Airport - Daren BARTHRAM</i></p>

GM1-ADR.OR.D.015.AR.200(e) – Personnel Requirements, Qualification of personnel
 The term qualification denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree. Qualification could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status. Qualification does not necessarily imply competence. **It may be more consistent for the national authority (CAA) to set out qualification requirements in an AMC.**

response

Noted

This Guidance Material does not intend to define how the level of qualification is determined, but rather to clarify what is the meaning of the term in the context of these rules. The use of alternative means of compliance is possible, in accordance with the provisions of the relevant Implementing Rules.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.015(f) – Personnel requirements – PERSONNEL RECORDS p. 101

comment

185

comment by: *SWISS AERODROMES ASSOCIATION*

This another demonstration of excessive regulation.

This AMC soulg be an GM and have its wording changed, "should have a system in place to record ..." being replaced by "should ensure that provisions are in place to provide information..."

response

Partially accepted

The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.

comment

346

comment by: *Avinor*

AMC1.ADR.OR.D.015 (f) (a). Replace "should have a system" by "should have provisions". "System" is too limited, it can also be a combination of systems or documents.

response

Partially accepted

The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has

amended the relevant text to clarify this issue.

comment 544 comment by: *Flughafen Düsseldorf GmbH*

a) Die Dokumentation sollte in geeigneter Art und Weise erfolgen, wobei ein System nicht zwingend erforderlich sein sollte.

response Partially accepted

The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.

comment 756 comment by: *ADP : Aeroports de Paris*

Référence: AMC1-ADR.OR.D.015(f)	Personnel requirements PERSONNEL RECORDS
Proposition/commentaire	(a) Il convient d'apporter la modification suivante: "The aerodrome operator should have a system provisions in place to record the following information for each person."
Justification	Un système peut s'avérer trop contraignant alors que de simples dispositions suffisent.
Traduction de courtoisie	(a) It is appropriate to modify in the following way: "The aerodrome operator should have a system provisions in place to record the following information for each person." A system can be too restrictive while simple provisions can be enough.

response Partially accepted

The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.

comment 898 comment by: *Union des Aéroports français - UAF*

Attachment [#126](#)

	UAF	NPA	2011-20	(B.II)	AMC1-ADR.OR.D.015(f)
	Référence: Personnel PERSONNEL				AMC1-ADR.OR.D.015(f) requirements RECORDS
	Traduction de courtoisie (a) It is appropriate to modify in the following way: "The aerodrome operator should have a system provisions in place to record the following information for each person." A system can be too restrictive while simple provisions can be enough.				
response	Partially accepted The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.				
comment	1021				comment by: <i>Finavia</i>
	Words " as a minimum:" to be removed. Far too detailed list which is also stated to be the minimum list.				
response	Noted The Agency believes this information is essential for the training record keeping.				
comment	1312				comment by: <i>UK CAA</i>
	Page No: 101 Paragraph No: AMC1-ADR.OR.D.015(f) Personnel Requirements (a) 1 Comment: Suggest removal of this point to be replaced by the text below. Justification: Previous working experience may not be relevant to the role. Proposed Text: (1) necessary qualifications and relevant working experience.				
response	Accepted The text has been amended in this direction.				
comment	1343				comment by: <i>Euroairport Bâle-Mulhouse</i>
	Attachment #127 Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(f)				

	<p>Référence: AMC1-ADR.OR.D.015(f) Personnel requirements PERSONNEL RECORDS</p> <p>Traduction de courtoisie (a) It is appropriate to modify in the following way: "The aerodrome operator should have a system provisions in place to record the following information for each person." A system can be too restrictive while simple provisions can be enough.</p>
response	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.</p>
comment	<p>1500 comment by: Cologne/Bonn Airport</p> <p>(a): change "system" to "provisions"</p>
response	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.</p>
comment	<p>1543 comment by: Geneva International Airport (ROMIG)</p> <p>Replace "should have a system" by "should have provisions"</p> <p>The notion of "system" is too limited. Provisions can be can be a combination of systems or documents or arrangements.</p>
response	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.</p>
comment	<p>1595 comment by: Aéroport de Marseille - MRS/LFML</p> <p>(a) It is appropriate to modify in the following way: "The aerodrome operator should have a system provisions in place to record the following</p>

	<p>information for each person.” A system can be too restrictive while simple provisions can be enough</p>
<p>response</p>	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.</p>
<p>comment</p>	<p>1841 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #128</p> <p>UAF NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(f)</p> <p>Référence: Personnel PERSONNEL AMC1-ADR.OR.D.015(f) requirements RECORDS</p> <p>Traduction de courtoisie (a) It is appropriate to modify in the following way: “The aerodrome operator should have a system provisions in place to record the following information for each person.” A system can be too restrictive while simple provisions can be enough.</p>
<p>response</p>	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.</p>
<p>comment</p>	<p>1913 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>(a) It is appropriate to modify in the following way: “The aerodrome operator should have a system provisions in place to record the following information for each person.” A system can be too restrictive while simple provisions can be enough.</p>
<p>response</p>	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.</p>

comment	<p>1945 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #129</p> <p>ADBM - NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(f)</p> <p>Référence: Personnel PERSONNEL AMC1-ADR.OR.D.015(f) requirements RECORDS</p> <p>Traduction de courtoisie (a) It is appropriate to modify in the following way: "The aerodrome operator should have a system provisions in place to record the following information for each person." A system can be too restrictive while simple provisions can be enough.</p>
response	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.</p>
comment	<p>1989 comment by: <i>Munich Airport International</i></p> <p>(a)</p> <p>replace "should have a system" by "should have provisions"</p> <p>Justification: system is too limited, can also be a combination of systems or documents</p>
response	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.</p>
comment	<p>2217 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Use "should have provisions" instead of "should have a system". Allows for flexibility</p>
response	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means,</p>

etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.

comment 2384 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC1-ADR.OR.D.015(f)	Personnel requirements PERSONNEL RECORDS
Proposition/commentaire	(a) Il convient d'apporter la modification suivante: "The aerodrome operator should have a system provisions in place to record the following information for each person."
Justification	Un système peut s'avérer trop contraignant alors que de simples dispositions suffisent.
Traduction de courtoisie	(a) It is appropriate to modify in the following way: "The aerodrome operator should have a system provisions in place to record the following information for each person." A system can be too restrictive while simple provisions can be enough.

response Partially accepted

The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.

comment 2451 comment by: *Isavia*

Suggest to add "education records" to the list.

response Partially accepted

The term 'qualifications' has been added to the list which is considered to cover the case of education records.

comment 2452 comment by: *Isavia*

Suggest to delete (i), firstly it is not necessary and secondly students usually do not sign training confirmation documents such as graduation certificates. We suggest to reword GM1-ADR.OR.D.015(f), to more appropriate wording for a GM, - to make it sound more like the guidance it is meant to be. E.g. replace " should include as a minimum:" with "may include, but not

	limited to"
response	Partially accepted The Agency understands that the comment is on GM1-ADR.OR.D.015(f). Item (i) will be removed. In addition, the Agency believes that the wording of the Guidance Material is appropriate for the intended purpose.
comment	2535 comment by: <i>ADV -German Airports Association</i> AMC1.ADR.OR.D.015 (f) (a) replace "should have a system" by "should have provisions" Justification: system is too limited, can also be a combination of systems or documents
response	Partially accepted The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information.The Agency has amended the relevant text to clarify this issue.
comment	2546 comment by: <i>MST / STR - Stuttgart Airport</i> AMC1.ADR.OR.D.015 (f) (a) replace "should have a system" by "should have provisions" Justification: system is too limited, can also be a combination of systems or documents
response	Partially accepted The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information.The Agency has amended the relevant text to clarify this issue.
comment	2640 comment by: <i>Fraport AG</i> AMC1-ADR.OR.D.015(f) – Personnel requirements (a) Editorial The aerodrome operator should have a system in place to record the following information for each person: The aerodrome operator should have provisions in place to record the following information for each person:

	Fraport Provisions meets more the circumstances of what to do	AG
response	<p>Partially accepted</p> <p>The aerodrome operator should have a record keeping system to maintain relevant records (see also ADR.OR.D.035 and related AMC). The term 'system' does not imply any new record keeping system or way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate to record the relevant information. The Agency has amended the relevant text to clarify this issue.</p>	

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.015(f) – Personnel requirements – TRAINING RECORDS</p>	p. 101
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comment	109	comment by: CAA Norway
	<p>We suggest to delete (i), firstly it is not necessary and secondly students usually do not sign training confirmation documents such as graduation certificates.</p> <p>We suggest to reword GM1-ADR.OR.D.015(f), to more appropriate wording for a GM, - to make it sound more like the guidance it is meant to be.</p> <p>E.g replace " should include as a minimum:" with "may include, but not limited to"</p>	
response	<p>Partially accepted</p> <p>Item (i) will be removed, while the wording of the Guidance Material was reviewed and was found to be appropriate for the intended purpose.</p>	

comment	433	comment by: Estonian CAA
	<p>"We suggest to reword GM1-ADR.OR.D.015(f), (i) to more appropriate wording for a GM, - to make it sound more like the guidance it is meant to be.</p> <p>E.g replace "" should include as a minimum:"" with ""may include, but not limited to"" "</p>	
response	<p>Noted</p> <p>The Agency has reviewed the wording of the Guidance Material and it was found to be appropriate for the intended purpose.</p>	

comment	475	comment by: Icelandic Civil Aviation Administration
	<p>Suggest to add "education records" to the list.</p>	
response	<p>Partially accepted</p> <p>The term 'qualifications' will be added to the list of the relevant AMC which covers the case of education records.</p>	

comment	476	comment by: <i>Icelandic Civil Aviation Administration</i>
	Suggest to delete (i), firstly it is not necessary and secondly students usually do not sign training confirmation documents such as graduation certificates. We suggest to reword GM1-ADR.OR.D.015(f), to more appropriate wording for a GM, - to make it sound more like the guidance it is meant to be. E.g replace " should include as a minimum:" with "may include, but not limited to"	
response	Partially accepted Item (i) will be removed. In addition, the Agency believes that the wording of the Guidance Material is appropriate for the intended purpose.	
comment	822	comment by: <i>Finnish Transport Safety Agency</i>
	We suggest to reword GM1-ADR.OR.D.015(f), to more appropriate wording for a GM, - to make it sound more like the guidance it is meant to be. E.g replace " should include as a minimum:" with "may include, but not limited to"	
response	Noted The Agency has reviewed the wording of the Guidance Material and it was found to be appropriate for the intended purpose.	
comment	1099	comment by: <i>NATS National Air Traffic Services Limited</i>
	There is a "should" in this GM implying that it is AMC rather than GM. Suggest adjusting text to be AMC/GM as appropriate.	
response	Noted	
comment	1440	comment by: <i>Swedish Transport Agency</i>
	We suggest to reword GM1-ADR.OR.D.015(f), (i) to more appropriate wording for a GM, - to make it sound more like the guidance it is meant to be. E.g replace " should include as a minimum:" with "may include, but not limited to"	
response	Noted The Agency has reviewed the wording of the Guidance Material and it was found to be appropriate for the intended purpose.	
comment	2134	comment by: <i>Danish Transport Authority</i>
	(i): We suggest to modify the initial part of the paragraph to "The training records maintained for each individual may include, but not limited to:".	
response	Noted The Agency has reviewed the wording of the Guidance Material and it was found to be appropriate for the intended purpose.	

comment

2383

comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC1-ADR.OR.D.015(f)	Personnel requirements PERSONNEL RECORDS
Proposition/commentaire	(a) Il convient d'apporter la modification suivante: "The aerodrome operator should have a system provisions in place to record the following information for each person."
Justification	Un système peut s'avérer trop contraignant alors que de simples dispositions suffisent.
Traduction de courtoisie	(a) It is appropriate to modify in the following way: "The aerodrome operator should have a system provisions in place to record the following information for each person." A system can be too restrictive while simple provisions can be enough.

response

Noted

The aerodrome operator should maintain relevant records. The term 'system' does not imply any way of achieving the requirement, (manual, database, combination of means, etc.), therefore, the aerodrome operator is free to choose the way that it considers appropriate.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.015(k) – Personnel requirements – DISTRIBUTION OF RULES AND PROCEDURES

p. 101-102

comment

110

comment by: *CAA Norway*

Editorial: The name of AMC1-ADR.OR.D.015(k) on page 101 is not correct. Should be named AMC1-ADR.OR.D.015(g).

response

Accepted

The title of the AMC has been amended, while the text has been simplified.

comment

244

comment by: *Brussels Airport - BRU/EBBR*

In my opinion there is a typing mistake in title :
AMC1-ADR.OR.D.015(k) - Personnel requirements
should be :
AMC1-ADR.OR.D.015(f) - Personnel requirements

response Accepted
The title of the AMC has been amended, while the text has been simplified.

comment 477 comment by: *Icelandic Civil Aviation Administration*
Editorial: The name of AMC1-ADR.OR.D.015(k) on page 101 is not correct. Should be named AMC1-ADR.OR.D.015(g).

response Accepted
The title of the AMC has been amended, while the text has been simplified.

comment 826 comment by: *Finnish Transport Safety Agency*
Editorial: The name of AMC1-ADR.OR.D.015(k) on page 101 is not correct. Should be named AMC1-ADR.OR.D.015(g).

response Accepted
The title of the AMC has been amended, while the text has been simplified.

comment 1100 comment by: *NATS National Air Traffic Services Limited*
There is no ADR.OR.D.015(k) for this to be AMC for.

response Accepted
The title of the AMC has been amended, while the text has been simplified.

comment 1441 comment by: *Swedish Transport Agency*
Editorial: The name of AMC1-ADR.OR.D.015(k) on page 101 is not correct. Should be named AMC1-ADR.OR.D.015(g).

response Accepted
The title of the AMC has been amended, while the text has been simplified.

comment 2453 comment by: *Isavia*
Editorial: The name of AMC1-ADR.OR.D.015(k) on page 101 is not correct. Should be named AMC1-ADR.OR.D.015(g).

response Accepted
The title of the AMC has been amended, while the text has been simplified.

comment 2641 comment by: *Fraport AG*

	<p>ADR.OR.D.015(k) – Personnel requirements to GM1- ADR.OR.D.015(g) – Personnel requirements</p> <p>Editorial</p> <p>x-check numeration</p> <p>Fraport AG</p> <p>Numeration seems not consistent.</p>
response	<p>Accepted</p> <p>The title of the AMC has been amended, while the text has been simplified.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.015(g) – Personnel requirements – DISTRIBUTION MEANS OF RULES AND PROCEDURES</p>	p. 102
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comment	<p>196 comment by: BAA</p> <p>AMC1-ADR.OR.D.015(g) Requirements for instructors and assessors should be included in the aerodrom manual</p>
response	<p>Accepted</p> <p>The relevant AMC will be amended to ensure that it includes the relevant training requirements for instructors and assessors.</p>
comment	<p>245 comment by: Brussels Airport - BRU/EBBR</p> <p>In my opinion there is a typing mistake in the title : GM1-ADR.OR.D.015(g) should be : GM1-ADR.OR.D.015(f)</p>
response	<p>Accepted</p> <p>The Agency will review all relevant AMC and GM to ensure correct numbering.</p>
comment	<p>1101 comment by: NATS National Air Traffic Services Limited</p> <p>It is customary for the GM to follow the related AMC rather than placed before it. Suggest moving the GM.</p>
response	<p>Accepted</p> <p>This Guidance Material was supposed to be linked to the previous AMC; however, its numbering was incorrect. The Agency will review all related AMC and GM to ensure correct numbering.</p>
comment	<p>2641 ❖ comment by: Fraport AG</p>

	<p>ADR.OR.D.015(k) – Personnel requirements to GM1- ADR.OR.D.015(g) – Personnel requirements</p> <p>Editorial</p> <p>x-check numeration</p> <p>Fraport AG Numeration seems not consistent.</p>
response	<p>Accepted</p> <p>The Agency will review all relevant AMC and GM to ensure correct numbering.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.015(g) – Personnel Requirements – TRAINING PROGRAMME</p>	<p>p. 102</p>
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comment	<p>18 comment by: <i>ACI EUROPE - Airports Council International</i></p> <p>(a) insert after unescortert: ... and have a role within the emergency operation.."</p> <p>Justification: too wide, should be more limited</p>
response	<p>Noted</p> <p>The relevant AMC is in line with the draft Implementing Rule, which is based on the relevant essential requirement contained in Annex Va of the Basic Regulation. People allowed unescorted access to the movement area do not necessarily relate to emergency operations, as this addresses also personnel of third parties. The AMC has been amended to, further, clarify its intent.</p>

comment	<p>19 comment by: <i>ACI EUROPE - Airports Council International</i></p> <p>(e) replace "file" by "record"</p> <p>Justification: GM1.ADR.OR.D.015 (f)</p>
response	<p>Noted</p> <p>The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both etc), depending on the record keeping method employed by the aerodrome operator.</p>

comment	<p>186 comment by: <i>SWISS AERODROMES ASSOCIATION</i></p> <p>This is another example of excessive regulation. This AMC should be a GM and be focussed on essentials.</p>
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	<p>For instance, what criteria allows for assessing the qualification of instructors basing on "at least 2 years of experience in the field where instruction is to be given" ?</p> <p>There is no reason for such a requirement which might even lead to reject adequate new resources for formal reasons only.</p>
response	<p>Partially accepted</p> <p>This AMC is in line with the draft Implementing Rule, which is based on the relevant essential requirement contained in Annex Va of the Basic Regulation.</p> <p>The Agency has the view that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience, is necessary to ensure the quality of assessment, so the text related to the experience of instructors and assessors (AMC2-ADR.OR.D.015(g) has been amended.</p>
comment	<p>348 comment by: <i>Avinor</i></p> <p>AMC1.ADR.OR.D.015 (g) (a). Insert after unescortert: "... and have a role within the emergency operation..". The sentence is too wide and it should be more limited.</p>
response	<p><i>Noted</i></p> <p>The relevant AMC is in line with the draft Implementing Rule, which is based on the relevant essential requirement contained in Annex Va of the Basic Regulation. People allowed unescorted access to the movement area do not necessarily relate to emergency operations, as this addresses also personnel of third parties. The AMC has been amended to further clarify its intent.</p>
comment	<p>349 comment by: <i>Avinor</i></p> <p>AMC1.ADR.OR.D.015 (g) e). Replace "file" by "record", ref GM1.ADR.OR.D.015 (f).</p>
response	<p><i>Noted</i></p> <p>The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both etc), depending on the record keeping method employed by the aerodorme operator.</p>
comment	<p>545 comment by: <i>Flughafen Düsseldorf GmbH</i></p> <p>Der Kreis der Personen sollte eingeschränkt werden, um den Aufwand in Grenzen zu halten. Es sollten lediglich Personen geschult werden, die safetyrelevante Tätigkeiten ausüben.</p>
response	<p><i>Noted</i></p> <p>The scope of the persons to be trained is already defined in the relevant Implementing Rule, which is based on the relevant essential requirements.</p>

comment	<p>546 comment by: <i>Flughafen Düsseldorf GmbH</i></p> <p>e) Die Aufzeichnungen müssen nicht zwangsweise in Form einer Datei erfolgen. Die Art und Weise muss flexibel sein.</p>								
response	<p>Noted</p> <p>The AMC does not limit the introduction of technological or other solutions that suit the needs of the aerodrome operator. In fact, the term 'file' mentioned in the AMC, denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both etc), depending on the record keeping method employed by the aerodrome operator.</p>								
comment	<p>663 comment by: <i>BAA Glasgow</i></p> <p>(C) What is meant by checking programme, is it an auditing tool or a tool for testing a level of understanding?.</p>								
response	<p>Accepted</p> <p>Checking aims at ensuring that a trainee has reached the necessary standard following the delivery of the training course. The Agency has amended the relevant texts and added relevant Guidance Material on this issue.</p>								
comment	<p>757 comment by: <i>ADP : Aeroports de Paris</i></p>								
<table border="1"> <tr> <td data-bbox="370 1102 807 1182">Référence: AMC1-ADR.OR.D.015(g)</td> <td data-bbox="807 1102 1414 1182">Personnel Requirements TRAINING PROGRAMME</td> </tr> <tr> <td data-bbox="370 1182 807 1648">Proposition/commentaire</td> <td data-bbox="807 1182 1414 1648"> <p>Le (g) est à supprimer car les informations demandées ne sont pas nécessairement incluses dans le manuel d'aérodrome.</p> <p>De plus, au (e), un fichier n'est pas obligatoirement nécessaire et un enregistrement est suffisant : "A training file record should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."</p> </td> </tr> <tr> <td data-bbox="370 1648 807 1693">Justification</td> <td data-bbox="807 1648 1414 1693"></td> </tr> <tr> <td data-bbox="370 1693 807 2020">Traduction de courtoisie</td> <td data-bbox="807 1693 1414 2020"> <p>The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual.</p> <p>Moreover, in the (e), a file is not compulsory necessary and a record is enough: "A training file record should be developed for each employee, including management, to assist in identifying and</p> </td> </tr> </table>		Référence: AMC1-ADR.OR.D.015(g)	Personnel Requirements TRAINING PROGRAMME	Proposition/commentaire	<p>Le (g) est à supprimer car les informations demandées ne sont pas nécessairement incluses dans le manuel d'aérodrome.</p> <p>De plus, au (e), un fichier n'est pas obligatoirement nécessaire et un enregistrement est suffisant : "A training file record should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."</p>	Justification		Traduction de courtoisie	<p>The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual.</p> <p>Moreover, in the (e), a file is not compulsory necessary and a record is enough: "A training file record should be developed for each employee, including management, to assist in identifying and</p>
Référence: AMC1-ADR.OR.D.015(g)	Personnel Requirements TRAINING PROGRAMME								
Proposition/commentaire	<p>Le (g) est à supprimer car les informations demandées ne sont pas nécessairement incluses dans le manuel d'aérodrome.</p> <p>De plus, au (e), un fichier n'est pas obligatoirement nécessaire et un enregistrement est suffisant : "A training file record should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."</p>								
Justification									
Traduction de courtoisie	<p>The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual.</p> <p>Moreover, in the (e), a file is not compulsory necessary and a record is enough: "A training file record should be developed for each employee, including management, to assist in identifying and</p>								

	tracking employee training requirements and verifying that personnel have received the planned training.”
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response Partially accepted

The Agency has reworded the text of the AMC to better define what has to be included in the aerodrome manual with regard to the training programme. However, information relevant to the training programme should be included in the aerodrome manual because it contains information based on which the certificate is issued. The aerodrome manual may also refer to other documents.

The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both etc), depending on the record keeping method employed by the aerodrome operator.

comment 900 comment by: *Union des Aéroports français - UAF*

Attachment [#130](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(g)

Référence: Personnel TRAINING AMC1-ADR.OR.D.015(g) Requirements PROGRAMME

Traduction de courtoisie

The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual. Moreover, in the (e), a file is not compulsory necessary and a record is enough: "A training file **record** should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."

response Partially accepted

The Agency has reworded the text of the AMC to better define what has to be included in the aerodrome manual with regard to the training programme. However, information relevant to the training programme should be included in the aerodrome manual because it contains information based on which the certificate is issued. The aerodrome manual may also refer to other documents.

The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both etc), depending on the record keeping method employed by the aerodrome operator.

comment 1102 comment by: *NATS National Air Traffic Services Limited*

2 comments

	<p>1. It is customary for the GM to follow the related AMC rather than placed before it. suggest moving the GM.</p> <p>2. It is customary for the AMC to follow the order of the IR so (g) should come before (k). Suggest re-ordering the AMC.</p>
response	<p><i>Accepted</i></p> <p>This Guidance Material was supposed to be linked to the previous AMC; however, its numbering was incorrect. The Agency has reviewed all related AMC and GM to ensure correct numbering.</p>
comment	<p>1103 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>There are two AMC to ADR.OR.D.015(g) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the two AMC into a single AMC.</p>
response	<p>Noted</p> <p>The relevant AMC cannot be merged because they are related to different requirements.</p>
comment	<p>1314 comment by: <i>UK CAA</i></p> <p>Page No: 102</p> <p>Paragraph No: AMC1-ADR.OR.D.015(g)</p> <p>Comment: The requirements for instructors and assessors should be addressed.</p> <p>Justification: AMC1-ADR.OR.D.015 (g) sets out requirements for a training programme. A key quality control measure of a training programme is the standard for trainers and assessors and this should be included in the aerodrome manual.</p> <p>Proposed Text: Insert new item (e) "The standards for trainers and instructors set out in (c) and (d) above should be referenced to the aerodrome manual."</p> <p>Renumber subsequent items.</p>
response	<p>Accepted</p> <p>The relevant AMC has been amended in the suggested direction to address the case of instructors and assessors.</p>
comment	<p>1315 comment by: <i>UK CAA</i></p> <p>Page No: 102</p>

	<p>Paragraph No: AMC1-ADR.OR.D.015(g) (b)(1)</p> <p>Comment: Training requirements are not something that need to be in the Aerodrome Manual. Revise sub-paragraph (b) (1)</p> <p>Justification: Their place is in the aerodrome operator's management system.</p> <p>Proposed Text: (b)(1) "A documented process to identify training requirements and track completion of required training".</p>
response	<p>Noted</p> <p>The aerodrome manual may contain or refer to the other documents.</p>
comment	<p>1316 comment by: UK CAA</p> <p>Page No: 102</p> <p>Paragraph No: AMC2-ADR.OR.D.015(g), (c)(1)(ii)</p> <p>Comment: Instructors may have a teaching qualification which should be recognised.</p> <p>Justification: Theoretical instruction may be delivered by an instructor with a recognised teaching qualification which should be recognised in the proposals.</p> <p>Proposed Text: Add at end of (c) (ii) "or hold a recognised teaching qualification."</p>
response	<p>Noted</p> <p>The Agency believes that cases such as this described in the proposal are already covered under paragraph (c)(ii) of the relevant AMC, and, therefore, there is no need to differentiate them.</p>
comment	<p>1344 comment by: Euroairport Bâle-Mulhouse</p> <p>Attachment #131</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(g)</p> <p>Référence: AMC1-ADR.OR.D.015(g) Personnel Requirements TRAINING PROGRAMME</p> <p>Traduction de courtoisie</p> <p>The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual. Moreover, in the (e), a file is not compulsory necessary and a record is enough: "A training file record should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."</p>
response	<p>Partially accepted</p>

The Agency has reworded the text of the AMC to better define what has to be included in the aerodrome manual with regard to the training programme. However, information relevant to the training programme should be included in the aerodrome manual because it contains information based on which the certificate is issued. The aerodrome manual may also refer to other documents.

The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

comment 1514 comment by: *Cologne/Bonn Airport*
(e) replace "file" by "records"

response Noted
The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical combination of both, etc.).

comment 1557 comment by: *Geneva International Airport (ROMIG)*
Replace "file" by "record"
A "training record" is the terme used in other articles such as GM1.ADR.OR.D.015 (f)

response Noted
The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

comment 1596 comment by: *Aéroport de Marseille - MRS/LFML*
The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual.
Moreover, in the (e), a file is not compulsory necessary and a record is enough:
"A training file record should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."

response Partially accepted
The Agency has reworded the text of the AMC to better define what has to be included in the aerodrome manual with regard to the training programme. However, information relevant to the training programme should be included in the aerodrome manual because it contains information based on which the certificate is issued. The aerodrome

manual may also refer to other documents.

The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

comment 1842 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#132](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(g)

Référence: Personnel TRAINING AMC1-ADR.OR.D.015(g) Requirements PROGRAMME

Traduction de courtoisie
The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual. Moreover, in the (e), a file is not compulsory necessary and a record is enough: "A training file **record** should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."

response *Partially accepted*

The Agency has reworded the text of the AMC to better define what has to be included in the aerodrome manual with regard to the training programme. However, information relevant to the training programme should be included in the aerodrome manual because it contains information based on which the certificate is issued. The aerodrome manual may also refer to other documents.

The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

comment 1912 comment by: *Pau Pyrénées Airport - PUF/LFBP*

The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual.

Moreover, in the (e), a file is not compulsory necessary and a record is enough:
"A training file **record** should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."

response *Partially accepted*

The Agency has reworded the text of the AMC to better define what has to be included in the aerodrome manual with regard to the training

programme. However, information relevant to the training programme should be included in the aerodrome manual because it contains information based on which the certificate is issued. The aerodrome manual may also refer to other documents.

The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

comment

1946 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

[Attachment #133](#)

ADBM - NPA 2011-20 (B.II) AMC1-ADR.OR.D.015(g)

Référence: AMC1-ADR.OR.D.015(g)
Personnel Requirements
TRAINING PROGRAMME

Traduction de courtoisie
The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual. Moreover, in the (e), a file is not compulsory necessary and a record is enough: "A training file record should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."

response

Partially accepted

The Agency has reworded the text of the AMC to better define what has to be included in the aerodrome manual with regard to the training programme. However, information relevant to the training programme should be included in the aerodrome manual because it contains information based on which the certificate is issued. The aerodrome manual may also refer to other documents.

The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

comment

1990 comment by: *Munich Airport International*

(a)

insert after unescortert: ... and have a role within the emergency operation.."

Justification: too wide, it should be more limited

response

Noted

The relevant AMC is in line with the draft Implementing Rule, which is

based on the relevant essential requirement contained in Annex Va of the Basic Regulation. People allowed unescorted access to the movement area do not necessarily relate to emergency operations, as this addresses also personnel of third parties. The AMC has been amended to, further, clarify its intent.

comment 1991 comment by: *Munich Airport International*
(e)
replace "file" by "record"
Justification: GM1.ADR.OR.D.015 (f)

response *Noted*
The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

comment 2135 comment by: *Danish Transport Authority*
Paragrapg (g): Query: Why should only (d), (e) and (f) be included to the aerodrome manual? Paragraph (b) describes that documented process should be included in the aerodrome manual.

response Accepted
The text of the AMC has been reworded to ensure that all relevant information is included in the aerodrome manual.

comment 2215 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
use "record" instead of "file" for consistency

response *Noted*
The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

comment 2231 comment by: *Glasgow Prestwick*
consider adding training file can be computer based and managed via training system

response *Noted*
The AMC does not limit the introduction of technological or other solutions that suit the needs of the aerodrome operator. The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both etc), depending on the record keeping method employed by the aerodrome operator.

comment

2385

comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

<p>Référence: AMC1-ADR.OR.D.015(g)</p>	<p>Personnel Requirements TRAINING PROGRAMME</p>
<p>Proposition/commentaire</p>	<p>Le (g) est à supprimer car les informations demandées ne sont pas nécessairement incluses dans le manuel d'aérodrome.</p> <p>De plus, au (e), un fichier n'est pas obligatoirement nécessaire et un enregistrement est suffisant : "A training file record should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."</p>
<p>Justification</p>	
<p>Traduction de courtoisie</p>	<p>The (g) is to be deleted because requested information is not necessarily included in the aerodrome manual.</p> <p>Moreover, in the (e), a file is not compulsory necessary and a record is enough: "A training file record should be developed for each employee, including management, to assist in identifying and tracking employee training requirements and verifying that personnel have received the planned training."</p>

response

Partially accepted

The Agency has reworded the text of the AMC to better define what has to be included in the aerodrome manual with regard to the training programme. However, information relevant to the training programme should be included in the aerodrome manual because it contains information based on which the certificate is issued. The aerodrome manual may also refer to other documents.

The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

comment

2536

comment by: *ADV -German Airports Association*

AMC1.ADR.OR.D.015 (g) (a)

insert after unescortert: ... and have a role within the emergency operation.."

Justification:

response	<p>too wide it should be more limited</p> <p>Noted</p> <p>The relevant AMC is in line with the draft Implementing Rule, which is based on the relevant essential requirement contained in Annex Va of the Basic Regulation. People allowed unescorted access to the movement area do not necessarily relate to emergency operations, as this addresses also personnel of third parties. The AMC has been amended to further clarify its intent.</p>
comment	<p>2537 <i>comment by: ADV -German Airports Association</i></p> <p>AMC1.ADR.OR.D.015 (g) e) replace "file" by "record"</p> <p>Justification: GM1.ADR.OR.D.015 (f)</p>
response	<p>Noted</p> <p>The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.</p>
comment	<p>2547 <i>comment by: MST / STR - Stuttgart Airport</i></p> <p>AMC1.ADR.OR.D.015 (g) (a) insert after unescortert: ... and have a role within the emergency operation.."</p> <p>Justification: too wide it should be more limited</p>
response	<p>Noted</p> <p>The relevant AMC is in line with the draft Implementing Rule, which is based on the relevant essential requirement contained in Annex Va of the Basic Regulation. People allowed unescorted access to the movement area do not necessarily relate to emergency operations, as this addresses also personnel of third parties. The AMC has been amended to further clarify its intent.</p>
comment	<p>2548 <i>comment by: MST / STR - Stuttgart Airport</i></p> <p>AMC1.ADR.OR.D.015 (g) e) replace "file" by "record"</p> <p>Justification: GM1.ADR.OR.D.015 (f)</p>
response	<p>Noted</p> <p>The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the</p>

aerodrome operator.

comment

2642

comment by: *Fraport AG*

AMC1-ADR.OR.D.015(g) — Personnel requirements (a)

Editorial

The training programme should cover all personnel involved in the operation, maintenance and management of the aerodrome and those persons operating **unescorted** on the movement area and other operational areas of the aerodrome, regardless of their level in the organisation.

Proposed Text

The training programme should cover all personnel involved in the operation, maintenance and management of the aerodrome and those persons operating **unescorted and have a role within the emergency operation** on the movement area and other operational areas of the aerodrome, regardless of their level in the organisation.

Fraport

AG

too wide, should be more limited

response

Noted

The relevant AMC is in line with the draft Implementing Rule, which is based on the relevant essential requirement contained in Annex Va of the Basic Regulation. People allowed unescorted access to the movement area do not necessarily relate to emergency operations, as this addresses also personnel of third parties. The AMC has been amended to further clarify its intent.

comment

2643

comment by: *Fraport AG*

AMC1-ADR.OR.D.015(g) — Personnel requirements (e)

Editorial

A training **file** should be developed for each employee, ...

Proposed Text

A training **record** should be developed for each employee, ...

Fraport

AG

Consistence to GM1- ADR.OR.D.015 (f)

response

Noted

The term 'file' denotes the means used to maintain the individual's training records. A file may have different forms (electronic, physical, combination of both, etc.), depending on the record keeping method employed by the aerodrome operator.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART
D – MANAGEMENT (ADR.OR.D) – AMC2-ADR.OR.D.015(g) –** p. 102-103
Personnel requirements – INSTRUCTORS – ASSESSORS

comment 111 comment by: CAA Norway
We suggest to move AMC2-ADR.OR.D.015(g) on page 102-103 to GM. Then do the changes as suggested below/later on.

response Noted
The Agency considers that AMC is the appropriate level for this type of material.

comment 112 comment by: CAA Norway
We suggest to delete all of AMC2-ADR.OR.D.015(g), (c)(1)(iii) on page 103. Experience (and as much as 2 years of experience) is not always necessary, i.e. to give training in theoretical subjects.

response Partially accepted
The Agency considers that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus the text has been amended in this direction.

comment 113 comment by: CAA Norway
We suggest to delete AMC2-ADR.OR.D.015(g), (c)(2)(iii) on page 103. A person with instructor's/teacher's training does not need to have practiced training in a particular area to be able to deliver a good teaching. Knowledge and skills in educational aspects can be transferred to different areas of instruction.

response Partially accepted
This part of the AMC deals with the practical skills. Therefore, instructional techniques specific for practical training are necessary; these techniques are not (necessarily) the same with the ones used for theoretical training, therefore, relevant skills and knowledge are required.
For example, the skills and techniques required to provide a theoretical training on the chemistry of fire in a classroom, differ from those required to provide practical training on extinguishing an aircraft fire. Of course, this does not mean that the same person cannot deliver both types of training.
In order to clarify the meaning of the text, the AMC has been reworded.

comment 165 comment by: Swedavia AB - Swedish airports (currently 11 airports)
Desireable to be listed as GM, too detailed as an AMC.
If not possible we suggest to delete all of AMC2-ADR.OR.D.015(g),

	<p>(c,d)(1)(iii) on page 103. Experience (and as much as 2 years of experience) is not always necessary, i.e. to give training in theoretical subjects.</p>
<p>response</p>	<p><i>Partially accepted</i></p> <p>The Agency considers that AMC is the appropriate level for this type of material. Moreover, The Agency considers that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus the text has been amended in this direction.</p>
<p>comment</p>	<p>195 comment by: BAA</p> <p>GM2-ADR.OR.D.015(a) Emergency Plan Management (a) (2) The role of the aerodrom in co-ordinating the plan should be recognised</p>
<p>response</p>	<p>Partially accepted</p> <p>Depending on national legislation and local arrangements this could also be taken over by another entity.</p>
<p>comment</p>	<p>197 comment by: BAA</p> <p>AMC2-ADR.OR.D.015(g) Instructors - Assessors (c)(1)(ii) Teaching qualifications held by instructors should be recognised.</p>
<p>response</p>	<p>Noted</p>
<p>comment</p>	<p>250 comment by: CAA Norway</p> <p>We suggest to delete all after "Checks" in AMC2-ADR.OR.D.015(g), (d)(1)(i) on page 103. It is not necessary to have conducted tests and checks in the particular areas. Knowledge and skill for testing can be transferred from subject to subject.</p>
<p>response</p>	<p>Noted</p> <p>Subparagraph (d)(1)(i) does not require an assessor to have conducted test and checks, but to have demonstrated his/her ability to so.</p>
<p>comment</p>	<p>251 comment by: CAA Norway</p> <p>We suggest to delete all after "given" in AMC2-ADR.OR.D.015(g), (d)(1)(iii) on page 103. This is too excessive. It is not necessary to have 2 years of working experience in the area of instruction.</p>
<p>response</p>	<p>Partially accepted</p> <p>The intent of subparagraph (d)(1)(iii) is to ensure that an assessor has at least two years' experience in the area that he/she is acting as assessor</p>

and not two years as instructor. The Agency has the view that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience, is necessary to ensure the quality of assessment. The text will be amended in this direction.

comment 435 comment by: *Estonian CAA*
We suggest to move AMC2-ADR.OR.D.015(g) on page 102-103 to GM. Then do the changes as suggested below/later on.

response Noted
The Agency considers that AMC is the appropriate level for this type of material.

comment 436 comment by: *Estonian CAA*
We suggest to delete all of AMC2-ADR.OR.D.015(g), (c)(1)(iii) on page 103. Experience (and as much as 2 years of experience) is not always necessary, i.e. to give training in theoretical subjects.

response Partially accepted
The Agency considers that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus the text has been amended in this direction.

comment 437 comment by: *Estonian CAA*
"We suggest to delete AMC2-ADR.OR.D.015(g), (c)(2)(iii) on page 103. A person with instructor's/teacher's training does not need to have practiced training in a particular area to be able to deliver a good teaching. Knowledge and skills in educational aspects can be transferred to different areas of instruction."

response Partially accepted
This part of the AMC deals with the practical skills. Therefore, instructional techniques specific for practical training are necessary; these techniques are not (necessarily) the same with the ones used for theoretical training, therefore, relevant skills and knowledge are required.
For example, the skills and techniques required to provide a theoretical training on the chemistry of fire in a classroom, differ from those required to provide practical training on extinguishing an aircraft fire. Of course, this does not mean that the same person cannot deliver both types of training.
In order to clarify the meaning of the text, the AMC has been reworded.

comment 438 comment by: *Estonian CAA*
"We suggest to delete all after ""Checks"" in AMC2-ADR.OR.D.015(g), (d)(1)(i) on page 103.

	<p>It is not necessary to have conducted tests and checks in the particular areas. Knowledge and skill for testing can be transferred from subject to subject."</p>
response	<p>Noted</p> <p>Subparagraph (d)(1)(i) does not require an assessor to have conducted test and checks, but to have demonstrated his/her ability to so.</p>
comment	<p>440 comment by: <i>Estonian CAA</i></p> <p>"We suggest to delete all after ""given"" in AMC2-ADR.OR.D.015(g), (d)(1)(iii) on page 103. This is too excessive. It is not necessary to have 2 years of working experience in the area of instruction."</p>
response	<p>Partially accepted</p> <p>The intent of subparagraph (d)(1)(iii) is to ensure that an assessor has at least two years' experience in the area that he/she is acting as assessor and not two years as instructor. The Agency considers that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus the text has been amended in this direction.</p>
comment	<p>478 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>We suggest to move AMC2-ADR.OR.D.015(g) on page 102-103 to GM. Then do the changes as suggested below/later on.</p>
response	<p>Noted</p> <p>The Agency considers that AMC is the appropriate level for this type of material.</p>
comment	<p>479 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>We suggest to delete all of AMC2-ADR.OR.D.015(g), (c)(1)(iii) on page 103. Experience (and as much as 2 years of experience) is not always necessary, i.e. to give training in theoretical subjects.</p>
response	<p>Partially accepted</p> <p>The Agency considers that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus the text has been amended in this direction.</p>
comment	<p>480 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>We suggest to delete AMC2-ADR.OR.D.015(g), (c)(2)(iii) on page 103. A person with instructor's/teacher's training does not need to have practiced training in a particular area to be able to deliver a good</p>

	<p>teaching. Knowledge and skills in educational aspects can be transferred to different areas of instruction.</p>
response	<p>Partially accepted</p> <p>This part of the AMC deals with the practical skills. Therefore, instructional techniques specific for practical training are necessary; these techniques are not (necessarily) the same with the ones used for theoretical training, therefore, relevant skills and knowledge are required.</p> <p>For example, the skills and techniques required to provide a theoretical training on the chemistry of fire in a classroom, differ from those required to provide practical training on extinguishing an aircraft fire. Of course, this does not mean that the same person cannot deliver both types of training.</p> <p>In order to clarify the meaning of the text, the AMC has been reworded.</p>
comment	<p>481 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>We suggest to delete all after "Checks" in AMC2-ADR.OR.D.015(g), (d)(1)(i) on page 103. It is not necessary to have conducted tests and checks in the particular areas. Knowledge and skill for testing can be transferred from subject to subject.</p>
response	<p>Noted</p> <p>Subparagraph (d)(1)(i) does not require an assessor to have conducted test and checks, but to have demonstrated his/her ability to so.</p>
comment	<p>482 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>We suggest to delete all after "given" in AMC2-ADR.OR.D.015(g), (d)(1)(iii) on page 103. This is too excessive. It is not necessary to have 2 years of working experience in the area of instruction.</p>
response	<p>Partially accepted</p> <p>The intent of subparagraph (d)(1)(iii) is to ensure that an assessor has at least two years' experience in the area that he/she is acting as assessor and not two years as instructor. The Agency considers that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus the text has been amended in this direction.</p>
comment	<p>664 comment by: <i>BAA Glasgow</i></p> <p>(a) Change check programme to testing programme. Check programme implies an audit, rather than here where it should imply the testing of a proficiency level.</p> <p>The details relating to the operation of a maintenance and competence scheme should be included within the Aerodrome Manual.</p>

response Partially accepted
The term 'check programme' is already used in the Basic Regulation, while the Agency has added relevant material on this issue.

comment 827 comment by: *Finnish Transport Safety Agency*
We suggest to move AMC2-ADR.OR.D.015(g) on page 102-103 to GM. Then do the changes as suggested below/later on.

response Noted
The Agency considers that AMC is the appropriate level for this type of material.

comment 828 comment by: *Finnish Transport Safety Agency*
We suggest to delete all of AMC2-ADR.OR.D.015(g), (c)(1)(iii) on page 103. Experience (and as much as 2 years of experience) is not always necessary, i.e. to give training in theoretical subjects.

response Partially accepted
The Agency considers that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus the text has been amended in this direction.

comment 830 comment by: *Finnish Transport Safety Agency*
We suggest to delete AMC2-ADR.OR.D.015(g), (c)(2)(iii) on page 103. A person with instructor's/teacher's training does not need to have practiced training in a particular area to be able to deliver a good teaching. Knowledge and skills in educational aspects can be transferred to different areas of instruction.

response Partially accepted
This part of the AMC deals with the practical skills. Therefore, instructional techniques specific for practical training are necessary; these techniques are not (necessarily) the same with the ones used for theoretical training, therefore, relevant skills and knowledge are required.
For example, the skills and techniques required to provide a theoretical training on the chemistry of fire in a classroom, differ from those required to provide practical training on extinguishing an aircraft fire. Of course, this does not mean that the same person cannot deliver both types of training.
In order to clarify the meaning of the text, the AMC has been reworded.

comment 831 comment by: *Finnish Transport Safety Agency*
We suggest to delete all after "Checks" in AMC2-ADR.OR.D.015(g), (d)(1)(i) on page 103. It is not necessary to have conducted tests and checks in the particular areas. Knowledge and skill for testing can be transferred from subject to subject.

response Noted
Subparagraph (d)(1)(i) does not require an assessor to have conducted test and checks, but to have demonstrated his/her ability to so.

comment 832 comment by: *Finnish Transport Safety Agency*
We suggest to delete all after "given" in AMC2-ADR.OR.D.015(g), (d)(1)(iii) on page 103. This is too excessive. It is not necessary to have 2 years of working experience in the area of instruction.

response Partially accepted
The intent of subparagraph (d)(1)(iii) is to ensure that an assessor has at least two years' experience in the area that he/she is acting as assessor and not two years as instructor. The Agency has the view that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus, the text has been amended in this direction.

comment 1027 comment by: *Swedish Regional Airport Association*
Regulate what, not how. Move details to GM

response Noted

comment 1104 comment by: *NATS National Air Traffic Services Limited*
There are two AMC to ADR.OR.D.015(g) which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the two AMC into a single AMC.

response Noted
The two AMC cannot be merged because they are related to different requirements.

comment 1317 comment by: *UK CAA*
Page No: 103
Paragraph No: AMC2-ADR.OR.D.015(g) item (c)(1)
Comment: The qualification requirements for instructors identified in (1) (i) and (iii) conflict.
Justification: The requirement should specify either "appropriate level or depth of knowledge" or "at least 2 years experience", not both. Subparagraph (i) corresponds more closely to safety management principles so delete (iii).

	Proposed Text: Delete sub-paragraph (c)(1)(iii)
response	Noted The Agency considers that experience does not necessarily relate to knowledge and vice versa.
comment	1319 comment by: UK CAA Page No: 103 Paragraph No: AMC2-ADR.OR.D.015(g) item (d)(1) Comment: The qualification requirements for assessors identified in (1) (i) and (iii) conflict. Justification: Sub-paragraph (i) includes the words "in the areas covered by the training". This infers that the assessor would have suitable experience and knowledge of these areas – if he does not the requirements of (i) cannot be met. Proposed Text: Delete sub-paragraph (d)(1)(iii)
response	Partially accepted The Agency believe that the content of sub-paragraph (d)(1)(i) and (d)(1)(iii) are not in conflict. The intent of subparagraph (d)(1)(iii) is to ensure that an assessor has at least two years' experience in the area that he/she is acting as assessor. Sub-paragraph (d)(1)(i) states that such an assessor should also have demonstrated its ability to act as assessor, that is to assess other people's performance, skills, knowledge etc. Having the minimum working experience does not mean that one is necessarily able to act as an assessor, nor that such ability has been demonstrated. In any case, the AMC has been amended and reference to minimum years of experience has been removed.
comment	1443 comment by: Swedish Transport Agency We suggest to move AMC2-ADR.OR.D.015(g) on page 102-103 to GM. Then do the changes as suggested later on.
response	Noted The Agency considers that AMC is the appropriate level for this type of material.
comment	1444 comment by: Swedish Transport Agency We suggest to delete all of AMC2-ADR.OR.D.015(g), (c)(1)(iii) on page 103. Experience (and as much as 2 years of experience) is not always necessary, i.e. to give training in theoretical subjects.
response	Partially accepted

The Agency considers that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus, the text has been amended in this direction.

comment 1445 comment by: *Swedish Transport Agency*
We suggest to delete AMC2-ADR.OR.D.015(g), (c)(2)(iii) on page 103. A person with instructor's/teacher's training does not need to have practiced training in a particular area to be able to deliver a good teaching. Knowledge and skills in educational aspects can be transferred to different areas of instruction.

response Partially accepted
This part of the AMC deals with the practical skills. Therefore, instructional techniques specific for practical training are necessary; these techniques are not (necessarily) the same with the ones used for theoretical training, therefore, relevant skills and knowledge are required.
For example, the skills and techniques required to provide a theoretical training on the chemistry of fire in a classroom, differ from those required to provide practical training on extinguishing an aircraft fire. Of course, this does not mean that the same person cannot deliver both types of training.
In order to clarify the meaning of the text, the AMC has been reworded.

comment 1446 comment by: *Swedish Transport Agency*
We suggest to delete all after "Checks" in AMC2-ADR.OR.D.015(g), (d)(1)(i) on page 103. It is not necessary to have conducted tests and checks in the particular areas. Knowledge and skill for testing can be transferred from subject to subject.

response Noted
Subparagraph (d)(1)(i) does not require an assessor to have conducted test and checks, but to have demonstrated his/her ability to so.

comment 1447 comment by: *Swedish Transport Agency*
We suggest to delete all after "given" in AMC2-ADR.OR.D.015(g), (d)(1)(iii) on page 103. This is too excessive. It is not necessary to have 2 years of working experience in the area of instruction.

response Partially accepted
The intent of subparagraph (d)(1)(iii) is to ensure that an assessor has at least two years' experience in the area that he/she is acting as assessor and not two years as instructor. The Agency has the view that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus, the text has been amended in this direction.

comment	<p>1457 comment by: <i>Finavia</i></p> <p>The following requirements/sentences to be removed: (c) (1)(iii) "at least 2 years of experience in the field where instruction is to be given." (d)(1)(iii) "... and have at least 2 years of working experience in the area of instruction."</p> <p>In small regional airports, where the amount of personnel is very limited, the assessor may need to make assessments for own instruction, courses or material.</p>
response	<p>Partially accepted</p> <p>With regard to subparagraph (c)(1)(iii), the Agency has the view that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered. The text has been amended in this direction.</p> <p>The intent of subparagraph (d)(1)(iii) is to ensure that an assessor has at least two years' experience in the area that he/she is acting as assessor and not two years as instructor. The Agency has the view that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus, the text has been amended in this direction.</p>
comment	<p>1710 comment by: <i>London Luton Airport Operations Ltd</i></p> <p>London Luton Airport Operatins Ltd supoprts this proposal. The high level elements of the scheme, which should include competencies, should be incorporated into the Aerodrome manual</p>
response	<p>Noted</p>
comment	<p>2103 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>AMC2-ADR.OR.D015 (g) Instructors – Assessors. Generally fits with UK practice.</p> <p>Consider including details in Aerodrome Manual. Consider including assessment of 1000m area, difficult environs and access roads.</p>
response	<p>Noted</p>
comment	<p>2136 comment by: <i>Danish Transport Authority</i></p> <p>Query: (C) (iii) and (d) (iii): The part of having at least 2 years of experience should be clarified. In our opinion this can be an limiting requirement in some cases without having equitable reasons. The paragraph should be moved to GM. Paragraph (c) (2): Description supports the requiremnets under paragraph (c) (1) and therefore should also be moved to GM.</p>

response Partially accepted

Subparagraph (c)(2) of the AMC deals with the practical skills, unlike subparagraph (c)(1) which deals with theoretical training. Although in both cases one has to have demonstrated his/her capabilities, there are differences between these types of training. For example, the skills and techniques required to provide a theoretical training on the chemistry of fire in a classroom, differ from those required to provide practical training on extinguishing an aircraft fire. Of course, this does not mean that the same person cannot deliver both types of training.

With regard to the amount of experience, the Agency has amended the text to ensure an adequate level of experience, but at AMC level, which given its content, is considered to be the appropriate level.

comment 2359 comment by: *Norwich International Airport*

AMC2-ADR.OR.015 (g) - Personnel requirements, Instructors - Assessors

NWI supports this requirement. **Consider inclusion of competence scheme details in Aerodrome Manual.**

(b) The aerodrome operator should ensure the plan includes the ready availability of, and coordination with, appropriate specialist rescue services to be able to respond to emergencies where an aerodrome is located close to water and/or swampy areas and where a significant portion of approach or departure operations takes place over these areas.

Consider including an assessment of 1,000m area, difficult environs and access roads together. MC1-ADR-OPS.B.005 — Aerodrome Emergency Planning

response Noted

comment 2454 comment by: *Isavia*

We suggest to delete all of AMC2-ADR.OR.D.015(g), (c)(1)(iii) on page 103. Experience (and as much as 2 years of experience) is not always necessary, i.e. to give training in theoretical subjects.

response Partially accepted

The Agency considers that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus the text has been amended in this direction.

comment 2455 comment by: *Isavia*

We suggest to delete AMC2-ADR.OR.D.015(g), (c)(2)(iii) on page 103. A person with instructor's/teacher's training does not need to have practiced training in a particular area to be able to deliver a good teaching. Knowledge and skills in educational aspects can be transferred to different areas of instruction.

response Partially accepted

This part of the AMC deals with the practical skills. Therefore, instructional techniques specific for practical training are necessary; these techniques are not (necessarily) the same with the ones used for theoretical training, therefore, relevant skills and knowledge are required.

For example, the skills and techniques required to provide a theoretical training on the chemistry of fire in a classroom, differ from those required to provide practical training on extinguishing an aircraft fire. Of course, this does not mean that the same person cannot deliver both types of training.

In order to clarify the meaning of the text, the AMC has been reworded.

comment 2456 comment by: *Isavia*

We suggest to delete all after "Checks" in AMC2-ADR.OR.D.015(g), (d)(1)(i) on page 103. It is not necessary to have conducted tests and checks in the particular areas. Knowledge and skill for testing can be transferred from subject to subject.

response Noted

Subparagraph (d)(1)(i) does not require an assessor to have conducted test and checks, but to have demonstrated his/her ability to so.

comment 2457 comment by: *Isavia*

We suggest to delete all after "given" in AMC2-ADR.OR.D.015(g), (d)(1)(iii) on page 103. This is too excessive. It is not necessary to have 2 years of working experience in the area of instruction.

response Partially accepted

The intent of subparagraph (d)(1)(iii) is to ensure that an assessor has at least two years' experience in the area that he/she is acting as assessor and not two years as instructor. The Agency has the view that the area of training is of paramount importance, as it is one of the recognised safety nets. Therefore, an adequate level of experience is necessary to ensure the quality of the training delivered, thus, the text has been amended in this direction.

comment 2582 comment by: *LJL Airport - Liverpool John Lennon Airport*

AMC2-ADR.OR.015 (g) – Personnel requirements, Instructors – Assessors Fits with current UK practice. **Consider supporting. Consider inclusion of competence scheme details in Aerodrome Manual.**

response Noted

comment 2590 comment by: *EAL AFS - Edinburgh Airport*

AMC2-ADR.OR.015 (g) – Personnel requirements, Instructors – Assessors

	<p>Fits with current UK practice. Consider supporting. Consider inclusion of competence scheme details in Aerodrome Manual.</p> <p>(b) The aerodrome operator should ensure the plan includes the ready availability of, and coordination with, appropriate specialist rescue services to be able to respond to emergencies where an aerodrome is located close to water and/or swampy areas and where a significant portion of approach or departure operations takes place over these areas. Consider including an assessment of 1,000m area, difficult environs and access roads together. MC1-ADR-OPS.B.005 – Aerodrome Emergency Planning</p>
response	Noted

comment	<p>2599 comment by: <i>Stansted Airport - Daren BARTH RAM</i></p> <p>AMC2-ADR.OR.015 (g) – Personnel requirements, Instructors – Assessors Fits with current UK practice. Consider supporting. Consider inclusion of competence scheme details in Aerodrome Manual.</p>
response	Noted

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.025(a) – Coordination with other relevant organisations – COORDINATION OF SAFETY PROCEDURES</p>	<p>p. 103</p>
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comment	<p>350 comment by: <i>Avinor</i></p> <p>GM1.ADR.OR.D.025 (a) (1). Insert "aerodrome" before "operator".</p>
response	<p>Accepted</p> <p>The word 'aerodrome' has been placed before the word operator.</p>

comment	<p>709 comment by: <i>Flughafen Düsseldorf GmbH</i></p> <p>Es ist völlig unklar, was hier mit safety procedures gemeint ist!</p>
response	Noted

comment	<p>1105 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>This is a statement and does not contain a "should" so it should be GM. Suggest change to GM.</p>
response	Noted

comment	<p>2104 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>AMC1-ADR.OR.D025 (a) (b) and (c) - Coordination and Interface with the safety procedures of other relevant organisation on the aerodrome to</p>
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	ensure compliance and lead safety committees. Support these items.
response	Noted
comment	2162 comment by: <i>Vereinigung der Dienstleister an Deutschen Flughäfen e.V. (VDF)</i> The list of services mentioned affirms the necessity of a definition of "ground handling". This list states ground handling as one service and others which are in view of the already existing Council Directive 96/67/EC ground handling services as well.
response	Noted

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC2-ADR.OR.D.025(b) – Coordination with other relevant organisations – SAFETY PROGRAMMES – AERODROME SAFETY COMMITTEES	p. 104
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comment	20 comment by: <i>ACI EUROPE - Airports Council International</i> (a) (1) insert "aerodrome" before "operator"
response	Accepted The word 'aerodrome' has been placed before the word operator.
comment	710 comment by: <i>Flughafen Düsseldorf GmbH</i> Dies ist u. E. eindeutig die Aufgabe des Safety Managers. Daher muss dieses AMC überarbeitet werden, um Kompetenzkonflikte zu vermeiden.
response	Noted The responsibility as such is with the aerodrome operator; the level of the involvement of persons and the details for the implementation of the necessary measures depends on how the relevant procedures are designed by the aerodrome operator.
comment	1106 comment by: <i>NATS National Air Traffic Services Limited</i> As there is no AMC1 to ADR.OR.D.025(b) then AMC2 should be AMC1.
response	Accepted The numbering of the AMC has been amended.
comment	1523 comment by: <i>ECA - European Cockpit Association</i> Change as follows: The aerodrome operator should establish, coordinate and lead local safety committees dealing with runway safety, and the safety of the operations on the movement area and at the aerodrome in general. All relevant

	<p>organizations, including pilots from local pilots' associations, operating or providing services at the aerodrome should participate to such safety committees.</p> <p>Justification: This paragraph should explicitly mention involvement of local pilots' associations in any safety committee. Indeed, Local pilots' association's involvement brings more input of operational view.</p>
response	<p>Noted</p> <p>The AMC and the relevant material foresee the participation of all interested parties.</p>
comment	<p>2105 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>GM1-ADR.OR.D025 - Check list for safety committees - support this item</p>
response	<p>Noted</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC3-ADR.OR.D.025(c) – Coordination with other relevant organisations – COMPLIANCE OF OTHER ORGANISATIONS</p>	<p>p. 104</p>
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comment	<p>678 comment by: <i>DSNA Direction des Services de la Navigation Aérienne</i></p> <p>DSNA is certified, on a national basis, by the National Surveillance Authority. This provision should be modified as follows :</p> <p><i>"In order to ensure compliance of the organisations operating or providing services at the aerodrome, with the regulatory requirements and with the content of aerodrome manual, the aerodrome operator should conduct audits and inspections of such organisations, through its compliance monitoring function, except for certified Air Navigation Service Providers."</i></p>
response	<p>Noted</p> <p>The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).</p>
comment	<p>712 comment by: <i>Flughafen Düsseldorf GmbH</i></p>

Hier kann aber nur abgefragt werden, ob grundsätzlich die Forderungen erfüllt werden! Eine fachliche Bewertung ist problematisch.

In wieweit hat man eine rechtliche Durchsetzbarkeit für Audits und Inspektionen bei Dritten?

response

Noted

The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).

comment

758

comment by: *ADP : Aeroports de Paris*

Référence: AMC3-ADR.OR.D.025(c)	Coordination with other relevant organisations COMPLIANCE OF OTHER ORGANISATIONS
Proposition/commentaire	Cette disposition est à supprimer.
Justification	L'exploitant d'aérodrome n'a pas les moyens de mener des audits chez les tiers présents sur la plateforme.
Traduction de courtoisie	This provision is to be deleted. The aerodrome operator does not have the means to conduct audits of the thirds on the platform.

response

Noted

The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).

comment

883

comment by: *MST / STR - Stuttgart Airport*

Es ist unklar, wie weit diese Regelung tatsächlich geht.

- Vor allem die Formulierung "to ensure" deutet auf eine

"Globalverantwortung" des Flughafenbetreibers hin, die auch - zivilrechtlich - Haftungsfolgen auslösen könnte. Zumindest ist dies nach deutschem Recht nicht auszuschließen.

- Im Übrigen vgl. die Ausführungen in der IR ADR.OR.D.025!
- Die AMC deutet darauf hin, dass tatsächlich umfassende Audits durchgeführt werden sollen. Das kann von den Flughafenbetreibern so nicht geleistet werden!
- Es sollte geregelt werden, dass der Flughafenbetreiber zwar koordinierend tätig ist, die (haftungsrechtliche) Verantwortung jedoch alleine bei der jeweiligen (dritten) Organisation liegt.
- Demnach sollte geregelt werden, dass es ausreicht, wenn sich der Flughafenbetreiber die Einhaltung der Vorschriften durch den Dritten schriftlich in regelmäßigen Abständen bestätigen lässt. Alles andere ist weder haftungs- noch versicherungsrechtlich zu vertreten oder ressourcenmäßig realisierbar!

response

Noted

The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).

comment

897

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX II - Part-OR - ADR.OR.D.025 — Coordination with other relevant organizations (p53)
- AMC/GM to ANNEX II - Part-OR - AMC3-ADR.OR.D.025(c) — Coordination with other relevant organisations (p104)

2. Justification and Proposed text / comment

This comment is linked with comment 1166 in book I.

Paragraph (a)(2) and paragraph (c) of this provision give too much responsibilities to the aerodrome operator although he has no legal power on some organisations working at the aerodrome.

The aerodrome operator can verify something exists within the organisation which is independent from him, but not "ensure" they exist, and absolutely not control the adequacy of such procedures with the content of the aerodrome manual.

Moreover, concerning paragraph (c), even big organizations, such as CDG

airport, don't have the resources to conduct audits and inspections on the hundred of airlines and ground handlers that work on the aerodrome: conduct such audits and inspections should remain a possibility left to the aerodrome operator and should not be mandatory, let alone through a "programme" which would imply to make such audits and inspections on a regular basis.

Therefore, DGAC thinks it's essential to delete paragraph (c) and the corresponding AMC:

ADR.OR.D.025 – Coordination with other relevant organisations

"(a) The aerodrome operator shall:

(1) ensure that the safety management system of the aerodrome explicitly addresses the coordination and interface with the safety procedures of other organisations operating or providing services at the aerodrome;

(2) ensure verify that such organisations ensure they have adequate safety procedures in place to comply with the requirements provisions laid down in the aerodrome manual;

(3) coordinate and document arrangements and responsibilities tasks of other organisations operating or providing services at the aerodrome.

(b) The aerodrome operator shall:

(1) develop, lead and implement programmes to promote safety and the exchange of safety-relevant information; and

(2) ensure that organisations mentioned in paragraph (a) are involved in such programmes.

(c) The aerodrome operator shall establish and implement a programme to ensure that the organisations mentioned in paragraph (a) comply with the applicable regulatory requirements and the content of the aerodrome manual."

~~AMC3 ADR.OR.D.025(c) – Coordination with other relevant organisations~~

~~"COMPLIANCE OF OTHER ORGANISATIONS~~

~~In order to ensure compliance of the organisations operating or providing services at the aerodrome, with the regulatory requirements and with the content of aerodrome manual, the aerodrome operator should conduct audits and inspections of such organisations, through its compliance monitoring function (see AMC3-ADR.OR.D.005 (d))."~~

response

Noted

The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).

comment

902

comment by: Union des Aéroports français - UAF

Attachment [#134](#)

UAF

NPA

2011-20

(B.II)

AMC3-ADR.OR.D.025(c)

Référence:

AMC3-ADR.OR.D.025(c)

	<p>Coordination with other relevant organisations COMPLIANCE OF OTHER ORGANISATIONS</p> <p>Traduction de courtoisie This provision is to be deleted. The aerodrome operator does not have the means to conduct audits of the thirds on the platform.</p>
response	<p>Noted</p> <p>The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).</p>
comment	<p><i>1107</i> comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>As there is no AMC1 (or AMC2) to ADR.OR.D.025(c) then AMC3 should be AMC1.</p> <p>AMC3-ADR.OR.D.005(d) is with regard to staffing levels for compliance monitoring and does not seem appropriate in the context of this AMC.</p>
response	<p>Accepted</p> <p>The Agency has reviewed and amended the numbering of the AMC and GM where necessary.</p>
comment	<p><i>1602</i> comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>This provision is to be deleted. The aerodrome operator does not have the means to conduct audits of the thirds on the platform.</p>
response	<p>Noted</p> <p>The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).</p>
comment	<p><i>1843</i> comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #135</p> <p>UAF NPA 2011-20 (B.II) AMC3-ADR.OR.D.025(c)</p>

	<p>Référence: AMC3-ADR.OR.D.025(c) Coordination with other relevant organisations COMPLIANCE OF OTHER ORGANISATIONS</p> <p>Traduction de courtoisie This provision is to be deleted. The aerodrome operator does not have the means to conduct audits of the thirds on the platform.</p>
response	<p><i>Noted</i></p> <p>The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).</p>
comment	<p>1909 comment by: Pau Pyrénées Airport - PUF/LFBP</p> <p>This provision is to be deleted. The aerodrome operator does not have the means to conduct audits of the thirds on the platform.</p>
response	<p><i>Noted</i></p> <p>The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).</p>
comment	<p>1948 comment by: ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</p> <p>Attachment #136</p> <p>ADBM - NPA 2011-20 (B.II) AMC3-ADR.OR.D.025(c)</p> <p>Référence: AMC3-ADR.OR.D.025(c) Coordination with other relevant organisations COMPLIANCE OF OTHER ORGANISATIONS</p> <p>Traduction de courtoisie This provision is to be deleted. The aerodrome operator does not have the means to conduct audits of the thirds on the platform.</p>
response	<p><i>Noted</i></p> <p>The Agency has changed this AMC into Guidance Material. In any case, the</p>

intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).

comment	2106	comment by: HIA - Highlands and Islands Airports Limited
	GM3-ADR.OR.D025 - Coordination of other activities on an aerodrome - support this item	
response	Noted	

comment	2116	comment by: AENA - Aeropuertos Españoles y Navegación Aérea
	<p>Paragraph (a)(2) and paragraph (c) of this provision give too much responsibilities to the aerodrome operator although he has no legal power on some organisations working at the aerodrome.</p> <p>The aerodrome operator can verify something exists within the organisation which is independent from him, but not "ensure" they exist, and absolutely not control the adequacy of such procedures with the content of the aerodrome manual.</p> <p>Moreover, concerning paragraph (c), even big organizations, such as MAD airport, don't have the resources to conduct audits and inspections on the hundred of airlines and ground handlers that work on the aerodrome: conduct such audits and inspections should remain a possibility left to the aerodrome operator and should not be mandatory, let alone through a "programme" which would imply to make such audits and inspections on a regular basis.</p> <p>Therefore, it's essential to delete paragraph (c) and the corresponding AMC:</p> <p>ADR.OR.D.025 – Coordination with other relevant organisations</p> <p><i>"(a) The aerodrome operator shall:</i></p> <p><i>(1) ensure that the safety management system of the aerodrome explicitly addresses the coordination and interface with the safety procedures of other organisations operating or providing services at the aerodrome;</i></p> <p><i>(2) ensure verify that such organisations ensure they have adequate safety procedures in place to comply with the requirements provisions laid down in the aerodrome manual;</i></p> <p><i>(3) coordinate and document arrangements and responsibilities tasks of other organisations operating or providing services at the aerodrome.</i></p> <p><i>(b) The aerodrome operator shall:</i></p> <p><i>(1) develop, lead and implement programmes to promote safety and the exchange of safety-relevant information; and</i></p> <p><i>(2) ensure that organisations mentioned in paragraph (a) are involved in such programmes.</i></p> <p><i>(c) The aerodrome operator shall establish and implement a programme to ensure that the organisations mentioned in paragraph (a) comply with the applicable regulatory requirements and the content of the aerodrome manual."</i></p>	

~~**AMC3-ADR.OR.D.025(c) Coordination with other relevant organisations**~~

~~"COMPLIANCE OF OTHER ORGANISATIONS~~

~~In order to ensure compliance of the organisations operating or providing services at the aerodrome, with the regulatory requirements and with the content of aerodrome manual, the aerodrome operator should conduct audits and inspections of such organisations, through its compliance monitoring function (see AMC3-ADR.OR.D.005 (d))."~~

response

Noted

The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).

comment

2163

comment by: *Vereinigung der Dienstleister an Deutschen Flughäfen e.V. (VDF)*

According to this regulation the aerodrome operator should conduct audits and inspections of other relevant organisations. Again this provision does not harmonize with the proposal for a regulation of the European Parliament and of the Council on ground handling services at Union airports and repealing Council Directive 96/67/EC. According to this proposal a ground handling provider needs an approval which will make such audits and inspections unfounded.

response

Noted

The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774). The Agency follows the relevant works on the amendment of the relevant EU law in the area of ground handling, while such an approval system does not invalidate the need for such safety assurance activities.

comment

2387

comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC3-ADR.OR.D.025(c)

Coordination with other relevant organisations
COMPLIANCE OF OTHER ORGANISATIONS

Proposition/commentaire

Cette disposition est à supprimer.

Justification	L'exploitant d'aérodrome n'a pas les moyens de mener des audits chez les tiers présents sur la plateforme.
Traduction de courtoisie	This provision is to be deleted. The aerodrome operator does not have the means to conduct audits of the thirds on the platform.

response

Noted

The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).

comment

2437 comment by: *SEARD - Societe d'exploitation des Aeroports de Rennes et Dinard*

Attachment [#137](#)

SEARD NPA 2011-20 (B.II) AMC3-ADR.OR.D.025(c)

Référence: AMC3-ADR.OR.D.025(c)
Coordination with other relevant organisations
COMPLIANCE OF OTHER ORGANISATIONS

Traduction de courtoisie
This provision is to be deleted.
The aerodrome operator does not have the means to conduct audits of the thirds on the platform.

response

Noted

The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).

comment

2504 comment by: *CANSO Civil Air Navigation Services Organization*

ADR.OR.D.025 "Coordination with other relevant organisations" together with AMC3-ADR.OR.D.025(c) stipulates that the aerodrome operator should conduct audits and inspections of the local air navigation services provider to assess its compliance with the applicable regulatory requirements. Insofar the local ATS provider is certified, it is subject to

continuous oversight by the competent authority already, which is not respected by the AMC.

justification:

Audits and inspections by the aerodrome operator would be unappropriate.

The same applies if the local ATS provider is part of a certified ANS provider.

alternative proposal:

for AMC3-ADR.OR.D.025(c):

In order to ensure compliance of the organisations operating or providing services at the aerodrome, with the regulatory requirements and with the content of aerodrome manual, the aerodrome operator should conduct audits and inspections of such organisations, through its compliance monitoring function, **except for certified Air Navigation Service Providers.**

response

Noted

The Agency has changed this AMC into Guidance Material. In any case, the intent of the requirement is to ensure that all organisations (certified or not) operating or providing services at the aerodrome have safety procedures which are coordinated with these of the aerodrome operator, in order to comply with the relevant aerodrome requirements, including the aerodrome manual. This is a safety assurance process, in the context of the aerodrome operator's safety management system, which is also foreseen in the ICAO aerodrome certification manual (Doc 9774).

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – GM1-ADR.OR.D.025 – Coordination with other relevant organisations – AERODROME SAFETY COMMITTEES

p. 104-105

comment

135

comment by: CAA-NL

Please add 'aerodrome' before 'operator' for clarity.

response

Accepted

The word 'aerodrome' has been added as suggested.

comment

547

comment by: Flughafen Düsseldorf GmbH

a) 1) "Operator" sollte durch "aerodrome" ergänzt werden.

response

Accepted

The word 'aerodrome' has been added as suggested.

comment

719

comment by: Flughafen Düsseldorf GmbH

	<p>Generell: Die Zusammensetzung und der Name der Committees sollte flughafenspezifisch anpassbar sein!</p> <p>a) 3) i) Wer ist das? Geschäftsführer? Verkehrsleiter sollte es nicht sein wegen mögliche Interessenskonflikte (siehe Trennung in der LuftVZO).</p> <p>a) 3) ii) Das ist eine Herabstufung/Herabsetzung der Bedeutung des Safety Managers. Dieser sollte alle Committees moderieren und die Arbeit in diesen vorantreiben. Das kann so nicht stehen bleiben!</p>
response	<p>Noted</p> <p>The names of the committees are indicative. In the committee mentioned in (3) (i), it is expected that the manager responsible for aerodrome operations will chair the committee, while the Agency does not share the view that the role of the safety manager is downgraded.</p>
comment	<p>1108 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p><u>2 comments</u></p> <p>1. There are multiple "should" in this GM implying that some are AMC rather than GM. Suggest adjusting the text to be AMC/GM as appropriate.</p> <p>2. There are two GM to ADR.OR.D.025 which are two distinct pieces of GM and all apply. This is contrary to previous EASA drafting principles.</p>
response	<p>Noted</p> <p>The use of 'should' is not necessarily associated with an AMC. The number of AMC and Guidance Material depends also on their content.</p>
comment	<p>1385 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none"> • AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.D.025 — Coordination with other relevant organisations (p104-105) <p><u>2. Justification and proposed text / comment</u></p> <p>Editorial comment: "AERODROME SAFETY COMMITTEES (a) Apron Safety Committee [...] (4) Composition Participation includes, but is not limited to: [...] (iv) wildlife management personnel;"</p>
response	<p>Noted</p> <p>The relevant text describes the areas from which representatives are expected to participate.</p>

comment	<p>1449 comment by: <i>Swedish Transport Agency</i></p> <p>Replace Air Traffic Controllers with ATS Personnel in order to include AFIS. This might be applicable also elsewhere.</p>
response	<p>Accepted</p> <p>The text has been reworded accordingly.</p>
comment	<p>1518 comment by: <i>Cologne/Bonn Airport</i></p> <p>(a)(1): add "aerodrome" before "operator"</p>
response	<p>Accepted</p> <p>The word 'aerodrome' has been added as suggested.</p>
comment	<p>1528 comment by: <i>ECA - European Cockpit Association</i></p> <p>Add as follows under (a)(4): Add as follows: (vii) pilots from local pilots' associations</p> <p>Justification: This paragraph should explicitly mention involvement of local pilots' associations in any safety committee. Indeed, Local pilots' association's involvement brings more input of operational view.</p>
response	<p>Noted</p> <p>The list of representatives is indicative, while aerodrome users active in flight operations are already included.</p>
comment	<p>1530 comment by: <i>ECA - European Cockpit Association</i></p> <p>Add as follows under (b)(2): (v) pilots from local pilots' associations</p> <p>Justification: This paragraph should explicitly mention involvement of local pilots' associations in any safety committee. Indeed, Local pilots' association's involvement brings more input of operational view.</p>
response	<p>Noted</p> <p>The list of representatives is indicative, while aerodrome users active in flight operations are already included.</p>
comment	<p>1585 comment by: <i>Geneva International Airport (ROMIG)</i></p> <p>Insert "aerodrome" before "operator" Aerodrome operator is the term used throughout the document.</p>
response	<p>Accepted</p> <p>The word aerodrome has been added as suggested.</p>

comment	1674	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none">• AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.D.025 — Coordination with other relevant organisations (p104-105)	
	<u>2. Justification and proposed text / comment</u>	
	Editorial comment: "AERODROME SAFETY COMMITTEES (a) Apron Safety Committee [...] (4) Composition Participation includes, but is not limited to: [...] (iv) wildlife management personnel ;"	
response	Noted	
comment	1992	comment by: <i>Munich Airport International</i>
	(a)	
	(1) insert "aerodrome" before "operator"	
response	Accepted The word aerodrome has been added as suggested.	
comment	2213	comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i>
	use "aerodrome operator" for consistency	
response	Accepted The word aerodrome has been added as suggested.	
comment	2538	comment by: <i>ADV -German Airports Association</i>
	GM1.ADR.OR.D.025 (a) (1) insert "aerodrome" before "operator"	
response	Accepted The word aerodrome has been added as suggested.	
comment	2549	comment by: <i>MST / STR - Stuttgart Airport</i>
	GM1.ADR.OR.D.025 (a) (1) insert "aerodrome" before "operator"	
response	Accepted The word aerodrome has been added as suggested.	

comment	2644	comment by: <i>Fraport AG</i>
	GM1-ADR.OR.D.025 — Coordination with other relevant organizations (a) (1)	
	Editorial	
	The operator should establish an Apron Safety Committee;	
	Proposed Text	
	The aerodrome operator should establish an Apron Safety Committee;	
	Fraport specify	AG
response	Accepted	
	The word aerodrome has been added as suggested.	

NPA 2011-20 (B.II) — AMC/GM to ANNEX II — Part -OR — SUBPART D — MANAGEMENT (ADR.OR.D) — GM3-ADR.OR.D.025 — Coordination with other relevant organisations — OTHER ACTIVITIES	p. 105
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comment	1109	comment by: <i>NATS National Air Traffic Services Limited</i>
	<u>2 comments</u>	
	As there is no GM2-ADR.OR.D.025 then GM3 should be GM2. Suggest merging the GM into a single GM.	
	There are two GM to ADR.OR.D.025 which are two distinct pieces of GM and all apply. This is contrary to previous EASA drafting principles.	
response	Noted	
	The Agency has reviewed and removed the relevant material.	

NPA 2011-20 (B.II) — AMC/GM to ANNEX II — Part -OR — SUBPART D — MANAGEMENT (ADR.OR.D) — AMC1-ADR.OR.D.030(a) — Safety reporting system — REPORTING SYSTEM	p. 105-106
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comment	252	comment by: <i>CAA Norway</i>
	The word "occurrence" in AMC1-ADR.OR.D.030(a) on page 105 should be replaced by "safety" = "Safety reporting system".	
response	Accepted	
	The terms used have been aligned with the terms used to describe the system.	

comment	441	comment by: <i>Estonian CAA</i>								
	The word "occurrence" in AMC1-ADR.OR.D.030(a) on page 105 should be replaced by "safety" = "Safety reporting system".									
response	Accepted									
	The terms used have been aligned with the terms used to describe the system.									
comment	483	comment by: <i>Icelandic Civil Aviation Administration</i>								
	The word "occurrence" in AMC1-ADR.OR.D.030(a) on page 105/6 should be replaced by "safety" = "Safety reporting system". Same in (d), (e) and (j).									
response	Accepted									
	The terms used have been aligned with the terms used to describe the system.									
comment	721	comment by: <i>Flughafen Düsseldorf GmbH</i>								
	j) Ein Feedback ist bei anonymen Meldungen nicht möglich.									
response	Noted									
comment	761	comment by: <i>ADP : Aeroports de Paris</i>								
	<table border="1"> <tr> <td>Référence: AMC1-ADR.OR.D.030(a)</td> <td>Safety reporting system REPORTING SYSTEM</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Il convient d'apporter la modification suivante au (d): "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"</td> </tr> <tr> <td>Justification</td> <td></td> </tr> <tr> <td>Traduction de courtoisie</td> <td>It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"</td> </tr> </table>		Référence: AMC1-ADR.OR.D.030(a)	Safety reporting system REPORTING SYSTEM	Proposition/commentaire	Il convient d'apporter la modification suivante au (d): "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"	Justification		Traduction de courtoisie	It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"
Référence: AMC1-ADR.OR.D.030(a)	Safety reporting system REPORTING SYSTEM									
Proposition/commentaire	Il convient d'apporter la modification suivante au (d): "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"									
Justification										
Traduction de courtoisie	It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"									
response	Noted									

The intent is to ensure that there is compatibility between the reporting means and format, so that the national reporting system is not affected.

comment 833 comment by: *Finnish Transport Safety Agency*

The word "occurrence" in AMC1-ADR.OR.D.030(a) on page 105/6 should be replaced by "safety" = "Safety reporting system". Same in (d), (e) and (j).

response Accepted

The terms used have been aligned with the terms used to describe the system.

comment 904 comment by: *Union des Aéroports français - UAF*

Attachment [#138](#)

UAF NPA 2011-20 (B.II) AMC1-ADR.OR.D.030(a)

Référence: AMC1-ADR.OR.D.030(a)
Safety reporting system
REPORTING SYSTEM

Traduction de courtoisie

It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which ~~should~~ **may** be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"

response Noted

The intent is to ensure that there is compatibility between the reporting means and format, so that the national reporting system is not affected.

comment 1006 comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX II - Part-OR - AMC1-ADR.OR.D.030 (a) - Safety reporting system (p105-106)

2. Justification and proposed text / comment

AMC1-ADR.OR.D.030 (a) describes means of compliance related to the operator safety reporting system. Subparagraph (i) states that "*Protection of the identity of the reporter should be ensured. This should be achieved by not recording any identifying information of the occurrence;*"

We agree that the identity of the reporter shall be protected as stated in ADR.OR.D.030 (c). Nevertheless, AMC1-ADR.OR.D.030 (a) provisions (*not recording any identifying information of the occurrence*) could prevent the operator from carrying out analyses of the incident. Indeed, it is crucial that the operator sets up procedures to be able to gather additional information on incidents if needed in order to avoid any misinterpretation. Without any link to the reporter the operator would not be in a position to analyse some events properly.

Obviously, and to take into account the protection principle, it is important

that the procedure to ask for additional information protect the reporter. Moreover, it is necessary to make a clear difference between the competent authority's needs and the operator's ones. Above are spelled out the reasons for keeping a link to the reporter in the operator SMS. As far as the competent authority is concerned, there is absolutely no need (and no right) to have names written in reports received. Therefore DGAC proposes to modify sub-paragraph (i) of AMC1-ADR.OR.D.030(a) as follows:

AMC1-ADR.OR.D.030 (a) - Safety reporting system

" [...]

(i) Protection of the identity of the reporter should be ensured. ~~This should be achieved by not recording any identifying information of the occurrence~~ The procedures set up by the operator to gather additional information for analyses or investigations should take this principle into account;

response

Accepted

The text has been modified accordingly.

comment

1366

comment by: *Euroairport Bâle-Mulhouse*

Attachment [#139](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OR.D.030(a)

Référence: AMC1-ADR.OR.D.030(a)
Safety reporting system
REPORTING SYSTEM

Traduction de courtoisie
It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which ~~should~~ **may** be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"

response

Noted

The intent is to ensure that there is compatibility between the reporting means and format, so that the national reporting system is not affected.

comment

1448

comment by: *Swedish Transport Agency*

The word "occurrence" in AMC1-ADR.OR.D.030(a) on page 105 should be replaced by "safety" = "Safety reporting system".

response

Accepted

The terms used have been aligned with the terms used to describe the system.

comment

1450

comment by: *Swedish Transport Agency*

Foregin aircraft operators report incidents to the state of register. The aerodrome should be given access to the reports if they have a need for

	the information.																				
response	<p>Noted</p> <p>The Agency understands that apart from the reporting requirements to the state of registry, aircraft operators are also required to report to the state of occurrence. The aerodrome operator should ensure the participation of aircraft operators to its safety reporting system.</p>																				
comment	<p>1574 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"</p>																				
response	<p>Noted</p> <p>The intent is to ensure that there is compatibility between the reporting means and format, so that the national reporting system is not affected.</p>																				
comment	<p>1832 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #140</p> <table border="0"> <tr> <td>UAF</td> <td>NPA</td> <td>2011-20</td> <td>(B.II)</td> <td>AMC1-ADR.OR.D.030(a)</td> </tr> <tr> <td>Référence:</td> <td></td> <td></td> <td></td> <td>AMC1-ADR.OR.D.030(a)</td> </tr> <tr> <td>Safety</td> <td></td> <td>reporting</td> <td></td> <td>system</td> </tr> <tr> <td>REPORTING</td> <td></td> <td></td> <td></td> <td>SYSTEM</td> </tr> </table> <p>Traduction de courtoisie</p> <p>It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"</p>	UAF	NPA	2011-20	(B.II)	AMC1-ADR.OR.D.030(a)	Référence:				AMC1-ADR.OR.D.030(a)	Safety		reporting		system	REPORTING				SYSTEM
UAF	NPA	2011-20	(B.II)	AMC1-ADR.OR.D.030(a)																	
Référence:				AMC1-ADR.OR.D.030(a)																	
Safety		reporting		system																	
REPORTING				SYSTEM																	
response	<p>Noted</p> <p>The intent is to ensure that there is compatibility between the reporting means and format, so that the national reporting system is not affected.</p>																				
comment	<p>1908 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"</p>																				
response	<p>Noted</p> <p>The intent is to ensure that there is compatibility between the reporting means and format, so that the national reporting system is not affected.</p>																				

comment

1949

comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#141](#)

ADBAM - NPA 2011-20 (B.II) AMC1-ADR.OR.D.030(a)

Référence: AMC1-ADR.OR.D.030(a)
Safety reporting system
REPORTING SYSTEM

Traduction de courtoisie
It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which ~~should~~ **may** be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"

response

Noted

The intent is to ensure that there is compatibility between the reporting means and format, so that the national reporting system is not affected.

comment

2122

comment by: *AENA - Aeropuertos Españoles y Navegación Aérea*

AMC1-ADR.OR.D.030 (a) describes means of compliance related to the operator safety reporting system. Subparagraph (i) states that "*Protection of the identity of the reporter should be ensured. This should be achieved by not recording any identifying information of the occurrence;*"

We agree that the identity of the reporter shall be protected as stated in ADR.OR.D.030 (c). Nevertheless, AMC1-ADR.OR.D.030 (a) provisions (*not recording any identifying information of the occurrence*) could prevent the operator from carrying out analyses of the incident. Indeed, it is crucial that the operator sets up procedures to be able to gather additional information on incidents if needed in order to avoid any misinterpretation. Without any link to the reporter the operator would not be in a position to analyse some events properly.

Obviously, and to take into account the protection principle, it is important that the procedure to ask for additional information protect the reporter.

Moreover, it is necessary to make a clear difference between the competent authority's needs and the operator's ones. Above are spelled out the reasons for keeping a link to the reporter in the operator SMS. As far as the competent authority is concerned, there is absolutely no need (and no right) to have names written in reports received.

Therefore it is proposed to modify sub-paragraph (i) of AMC1-ADR.OR.D.030(a) as follows:

AMC1-ADR.OR.D.030 (a) - Safety reporting system

" [...]

(i) Protection of the identity of the reporter should be ensured. ~~This should be achieved by not recording any identifying information of the occurrence~~

The procedures set up by the operator to gather additional information for analyses or investigations should take this principle into account;

response Accepted

The text will be modified accordingly.

comment 2138 comment by: Danish Transport Authority

Query: The paragraph has a headline of "Safety reporting System" which include both the mandatory and voluntary reporting. Under paragraph (a), (e) og (j) the definition "occurrence reporting system" is used.

response Accepted

The terms used have been aligned with the terms used to describe the system.

comment 2371 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence: AMC1-ADR.OR.D.030(a)	Safety reporting system REPORTING SYSTEM
Proposition/commentaire	Il convient d'apporter la modification suivante au (d): "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"
Justification	
Traduction de courtoisie	It is appropriate to modify the (d) in the following way : "The aerodrome operator should provide the means and the format for the occurrence reporting, which should may be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format and required information to be reported ;"

response Noted

The intent is to ensure that there is compatibility between the reporting means and format, so that the national reporting system is not affected.

comment	726	comment by: <i>Flughafen Düsseldorf GmbH</i>
	a) Eine Verbesserung des "reporting systems" bewirkt ggf. das Gegenteil, da durch mehr Meldungen die Statistik schlechter wird.	
response	Noted	
	The effectiveness of the reporting systems and an increase of the reports themselves do not increase the frequency or the probability for such events; such a reporting system reflects the reality and contributes to efficient decision making and mitigation, and is an essential part of proactive safety management.	
comment	1118	comment by: <i>NATS National Air Traffic Services Limited</i>
	Sub-paragraph (b) - There is a "should" in this GM implying that it is AMC rather than GM. Suggest adjusting the text to be AMC/GM as appropriate.	
response	Noted	
	The use of 'should' in a Guidance Material does not affect its nature.	
comment	2137	comment by: <i>Danish Transport Authority</i>
	Query: The paragraph has a headline of "Safety reporting System" which include both the mandatory and voluntary reporting. Under paragraph (a), (e) og (j) the definition "occurrence reporting system" is used.	
response	Accepted	
	The terms used have been aligned with the terms used to describe the system.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D – MANAGEMENT (ADR.OR.D) – AMC2-ADR.OR.D.030(b);(c) – Safety reporting system – WILDLIFE MANAGEMENT REPORTING	p. 106-107
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comment	539	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Wildlife Management Reporting ist keine originäre Aufgabe des Safety Reporting, sondern im Bereich Umweltmanagement angesiedelt. Hier besteht eine Vermischung von Aufgaben und Verantwortlichkeiten! Die Daten werden zwar vom SMS verwendet, hier sollte jedoch durch die Verwendung der Begrifflichkeit „Safety reporting system“ nicht initiiert werden, dass eine Erfassung von Wildlife Strike Reports oder die Einleitung von Maßnahmen vom Safety Management übernommen werden.	
response	Noted	
	The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting	

system of the aerodrome operator, which is a part of its safety management system.
If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme.
This does not prevent the use of the relevant information by any other organisational unit or prescribe any organisational structure of the aerodrome operator.

comment

763		comment by: <i>ADP : Aeroports de Paris</i>
Référence: AMC2-ADR.OR.D.030(b);(c)	Safety reporting system WILDLIFE MANAGEMENT REPORTING	
Proposition/commentaire	Nous remarquons une incohérence avec l'ADR-OR-D.030 (a): il y a ici un problème de répartition entre l'autorité de régulation et l'exploitant d'aérodrome.	
Justification	Il semble qu'il y ait une confusion entre le rôle de l'exploitant d'aérodrome et celui de l'autorité compétente d'autant plus qu'en la matière, les exploitants d'aéronefs, ceux de la maintenance et les ATC réfèrent directement à l'autorité compétente.	
Traduction de courtoisie	We notice an inconsistency with the ADR-OR-D.030 (a): there is a problem of distribution between the regulation authority and the aerodrome operator. It seems that there is a confusion between the aerodrome operator role and the competent authority role all the more so in that matter, aircraft operators, maintenance services and ATC refer directly to the competent authority.	

response

Noted

The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting system of the aerodrome operator, which is a part of its safety management system.
If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme.

comment

867

comment by: *Airport Nuremberg - NUE/EDDN*

Wildlife Management Reporting should not be a task of the safety management system, but rather be subordinated under the environmental management, which is tracking, monitoring and documenting wildlife

response	<p>As there is no AMC1 to ADR.OR.D.030(b);(c) then AMC2 should be AMC1.</p> <p>Accepted</p> <p>The two AMC on safety reporting have been merged.</p>
comment	<p>1345 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #143</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC2-ADR.OR.D.030(b);(c)</p> <p>Référence: AMC2-ADR.OR.D.030(b);(c) Safety reporting system WILDLIFE MANAGEMENT REPORTING</p> <p>Traduction de courtoisie</p> <p>We notice an inconsistency with the ADR-OR-D.030 (a): there is a problem of distribution between the regulation authority and the aerodrome operator.</p> <p>It seems that there is a confusion between the aerodrome operator role and the competent authority role all the more so in that matter, aircraft operators, maintenance services and ATC refer directly to the competent authority.</p>
response	<p>Noted</p> <p>The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting system of the aerodrome operator, which is a part of its safety management system.</p> <p>If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme</p>
comment	<p>1389 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• AMC/GM to ANNEX II – Part-OR – AMC2-ADR.OR.D.030(b);(c) – Safety reporting system – <i>WILDLIFE MANAGEMENT REPORTING</i> (p106) <p><u>2. Justification and proposed text / comment</u></p> <p>The aerodrome operator does not have the regulatory competence to ensure that third parties submit wildlife strikes and safety occurrences report to the aerodrome operator. The proposed wording is not limited to the aerodrome. Hence the proposed text which should preferably be included as GM4 in ADR-OPS.B.020:</p> <p>AMC2-ADR.OR.D.030(b);(c) – Safety reporting system "WILDLIFE MANAGEMENT REPORTING <i>The aerodrome operator should establish coordination with third parties (aircraft operators, aircraft mechanics, air traffic controllers, etc) and instructions to all aerodrome personnel for submitting to the aerodrome operator reports related to wildlife strikes and relevant identified hazards</i></p>

response	<p><i>on the aerodrome irrespectively of any other requirements according to which they have to report to the competent authority of the aerodrome or the state of registry of the aircraft involved, or any other competent authority in the context of the national occurrence reporting programme."</i></p> <p>Noted</p> <p>The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting system of the aerodrome operator, which is a part of its safety management system.</p> <p>If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme.</p> <p>The text is not limited to 'on the aerodrome' because such an event may take place in the surroundings of the aerodrome.</p>
comment	<p>1451 comment by: <i>Swedish Transport Agency</i></p> <p>Replace Air Traffic Controllers with ATS Personnel in order to include AFIS. This might be applicable also elsewhere.</p>
response	<p>Accepted</p> <p>The text has been amended in this direction.</p>
comment	<p>1601 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>We notice an inconsistency with the ADR-OR-D.030 (a): there is a problem of distribution between the regulation authority and the aerodrome operator.</p> <p>It seems that there is a confusion between the aerodrome operator role and the competent authority role all the more so in that matter, aircraft operators, maintenance services and ATC refer directly to the competent authority.</p>
response	<p>Noted</p> <p>The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting system of the aerodrome operator, which is a part of its safety management system.</p> <p>If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme.</p>
comment	<p>1682 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• AMC/GM to ANNEX II — Part-OR — AMC2-ADR.OR.D.030(b);(c) — Safety reporting system - <i>WILDLIFE MANAGEMENT REPORTING</i> (p106) <p><u>2. Justification and proposed text / comment</u></p>

The aerodrome operator does not have the regulatory competence to ensure that third parties submit wildlife strikes and safety occurrences report to the aerodrome operator. The proposed wording is not limited to the aerodrome. Hence the proposed text which should preferably be included as GM4 in ADR-OPS.B.020:

AMC2-ADR.OR.D.030(b);(c) – Safety reporting system

“WILDLIFE MANAGEMENT REPORTING

The aerodrome operator should establish coordination with third parties (aircraft operators, aircraft mechanics, air traffic controllers, etc) and instructions to all aerodrome personnel for submitting to the aerodrome operator reports related to wildlife strikes and relevant identified hazards on the aerodrome irrespectively of any other requirements according to which they have to report to the competent authority of the aerodrome or the state of registry of the aircraft involved, or any other competent authority in the context of the national occurrence reporting programme.”

response

Noted

The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting system of the aerodrome operator, which is a part of its safety management system.

If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme.

The text is not limited to the aerodrome because such an event may take place in the surroundings of the aerodrome.

comment

1907

comment by: Pau Pyrénées Airport - PUF/LFBP

We notice an inconsistency with the ADR-OR-D.030 (a): there is a problem of distribution between the regulation authority and the aerodrome operator.

It seems that there is a confusion between the aerodrome operator role and the competent authority role all the more so in that matter, aircraft operators, maintenance services and ATC refer directly to the competent authority.

response

Noted

The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting system of the aerodrome operator, which is a part of its safety management system.

If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme

comment

1950

comment by: ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD

Attachment [#144](#)

ADBM - NPA 2011-20 (B.II) AMC2-ADR.OR.D.030(b);(c)

	<p>Référence: AMC2-ADR.OR.D.030(b);(c) Safety reporting system WILDLIFE MANAGEMENT REPORTING</p> <p>Traduction de courtoisie We notice an inconsistency with the ADR-OR-D.030 (a): there is a problem of distribution between the regulation authority and the aerodrome operator. It seems that there is a confusion between the aerodrome operator role and the competent authority role all the more so in that matter, aircraft operators, maintenance services and ATC refer directly to the competent authority.</p>
response	<p>Noted</p> <p>The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting system of the aerodrome operator, which is a part of its safety management system. If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme.</p>
comment	<p>2067 comment by: AENA - Aeropuertos Españoles y Navegación Aérea</p> <p>The aerodrome operator does not have the regulatory competence to ensure that third parties submit wildlife strikes and safety occurrences report to the aerodrome operator. The proposed wording is not limited to the aerodrome. Hence the proposed text which should preferably be included as GM4 in ADR-OPS.B.020:</p> <p>AMC2-ADR.OR.D.030(b);(c) – Safety reporting system "WILDLIFE MANAGEMENT REPORTING <i>The aerodrome operator should/may establish coordination with third parties (aircraft operators, aircraft mechanics, air traffic controllers, etc) and instructions to all aerodrome personnel for submitting to the aerodrome operator reports related to wildlife strikes and relevant identified hazards on the aerodrome or during the approach or initial climb phases irrespectively of any other requirements according to which they have to report to the competent authority of the aerodrome or the state of registry of the aircraft involved, or any other competent authority in the context of the national occurrence reporting programme."</i></p>
response	<p>Noted</p> <p>The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting system of the aerodrome operator, which is a part of its safety management system. If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme. The text is not limited to 'the aerodrome or during the approach or initial climb phases' because such an event may take place in other points of the surroundings of the aerodrome.</p>

comment 2386 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence: AMC2-ADR.OR.D.030(b);(c)	Safety reporting system WILDLIFE MANAGEMENT REPORTING
Proposition/commentaire	Nous remarquons une incohérence avec l'ADR-OR-D.030 (a): il y a ici un problème de répartition entre l'autorité de régulation et l'exploitant d'aérodrome.
Justification	Il semble qu'il y ait une confusion entre le rôle de l'exploitant d'aérodrome et celui de l'autorité compétente d'autant plus qu'en la matière, les exploitants d'aéronefs, ceux de la maintenance et les ATC réfèrent directement à l'autorité compétente.
Traduction de courtoisie	We notice an inconsistency with the ADR-OR-D.030 (a): there is a problem of distribution between the regulation authority and the aerodrome operator. It seems that there is a confusion between the aerodrome operator role and the competent authority role all the more so in that matter, aircraft operators, maintenance services and ATC refer directly to the competent authority.

response Noted

The reporting of such third party organisations and persons to the aerodrome operator should be done in the context of the safety reporting system of the aerodrome operator, which is a part of its safety management system.
If this is not done, then the aerodrome operator will not be in a position to know about such events and take the necessary corrective measures with regard to its wildlife hazard management programme

**NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC1-ADR.OR.D.035 – Record-keeping p. 107
– DOCUMENTATION TO BE RETAINED**

comment 1028 comment by: Finavia

(d) The following sentence to be deleted "which should be updated within 24 hours of any new entry."

It must be up to the airport operator to decide how to organize backups.

response Noted

comment	1122	comment by: <i>NATS National Air Traffic Services Limited</i>
	<u>2 comments</u>	
	1. There are two AMC to ADR.OR.D.035 which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the two AMC into a single AMC.	
	2. This AMC contains multiple "should" in multiple paragraphs thus confusing the requirement, Suggest making each "should" into its own, unique AMC or rewrite such that a single "should" leads into the text thus facilitating a unique reference that can be tracked through a database.	
response	Noted	
	The reason for the existence of two different AMC is that they deal with rather different issues. AMC1 deals generally with record keeping, while AMC2 refers to specific records that need to be maintained. It is not always possible to avoid using the same words in the text, especially given the different content of each paragraph.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART D
– MANAGEMENT (ADR.OR.D) – AMC 2 – ADR.OR.D.035 Record keeping p. 107
– RECORDING OF AIRCRAFT MOVEMENTS

comment	1127	comment by: <i>NATS National Air Traffic Services Limited</i>
	There are two AMC to ADR.OR.D.035 which are not two different ways of satisfying the IR, rather both must be complied with in order to satisfy the IR. This is contrary to previous EASA drafting principles and how could alternative means of compliance be developed against multiple acceptable means of compliance. Suggest merging the two AMC into a single AMC.	
response	Noted	
	The reason for the existence of two different AMC is that they deal with rather different issues. AMC1 deals generally with record keeping, while AMC2 refers to specific records that need to be maintained.	
comment	1130	comment by: <i>NATS National Air Traffic Services Limited</i>
	Sub-paragraph (d) - This AMC refers to AMC1-ADR.OR.D.035 (b) to (f). AMC1-ADR.OR.D.035 does not contain (f).	
response	Accepted	
	Reference to paragraph (f) has been removed.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART E p. 109

**– AERODROME MANUAL (ADR.OR.E) – AMC1-ADR.OR.E.005 –
Aerodrome manual – GENERAL**

comment

824 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- A. Explanatory Note - EXECUTIVE SUMMARY (p2)
- A. Explanatory Note - II. Process and scope (p5,6): note 1
- A. Explanatory Note - III. Overview of the rules proposed in this NPA - Certification process including the establishment of the certification basis (CB) (p9): (23) (24)
- Draft Commission Regulation (p2-5): §11
- ANNEX II - Part-OR - ADR.OR.D.035 — Record keeping (p55)
- AMC/GM to ANNEX I — Part-AR — GM1-ADR.AR.C.055 — Findings, corrective actions and enforcement measures (p34)
- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.E.005 — Aerodrome manual (p109)
- AMC/GM to ANNEX II — Part-OR — AMC2-ADR.OR.E.005 — Aerodrome manual (p109-114)

2. Justification and proposed text / comment

This comment is linked with comment 24 in Explanatory Note and 1078 in book II.

As indicated in the explanatory note (pages 2, 5, 6 and 9), requirements for the certification of aerodrome equipment, as well as for the oversight of designers and producers of safety-critical aerodrome equipment will follow at a later stage jointly with the work to be done for specific ATM systems and constituents. This work will probably help knowing which equipment is ATM and which is aerodrome, knowing that most of it is ATM equipment.

Therefore, the aerodrome equipment should not be part of the aerodrome manual since lots of it is air traffic management equipment. Moreover, the pertinence of having a manual for aerodrome equipment in charge of the aerodrome operator is not proved and merits further debates.

Consequently:

- the first bullet of **GM1-ADR.AR.C.055 is to be deleted**
- Paragraph 4.3 of Part C of the content of the aerodrome manual of the proposed GM1-ADR.OR.E.010 — *Structure of the aerodrome manual* is to be deleted, all the more that outside the boundaries of the aerodrome, the aerodrome operator is no more competent;
- Paragraph 13 of Part E of the content of the aerodrome manual of the proposed GM1-ADR.OR.E.010 — *Structure of the aerodrome manual* is to be deleted

“ADR.OR.D.035 – Record-keeping

[...]

(d) [...]

(3) ~~manuals of aerodrome equipment or systems employed at the aerodrome, for as long as they are used at the aerodrome~~

[...]”

GM1-ADR.AR.C.055 – Findings, corrective actions and enforcement measures

"CATEGORIES OF FINDINGS – DOCUMENTARY EVIDENCE

Examples of documentary evidence include but is not limited to:

– aerodrome or equipment manuals;

[...]"

AMC2-GM1-ADR.OR.E.00510 – Structure of the Aerodrome manual

"[...]

C. PART C – PARTICULARS OF THE AERODROME SITE

[...]

4.3 a plan showing the location of any aerodrome facilities and equipment outside the boundaries of the aerodrome;

[...]

E. PART ~~D~~ E – PARTICULARS OF THE ~~AERODROME OPERATING PROCEDURES AND SAFETY MEASURES~~ OPERATING PROCEDURES OF THE AERODROME, ITS EQUIPMENT AND SAFETY MEASURES

[...]

~~13. Maintenance and repair instructions, servicing information, troubleshooting and inspection procedures of aerodrome equipment~~

[...]"

response

Partially accepted

The Agency agrees that this was a discrepancy between the AMC2 and the relevant requirement ADR.OR.E.005. To better address this, the Agency has moved the first sentence of ADR.OR.E.010 to paragraph (b) of ADR.OR.E.005. In this way, the actual content of the requirements and the relevant AMC will be better organised. Moreover, the remaining paragraphs of ADR.OR.E.010 have also being integrated with ADR.OR.E.005 as its last paragraph.

However, the Agency believes that the content of the aerodrome manual should remain at AMC level. With regard to the aerodrome equipment mentioned in AMC2, the Agency considers that the content of this AMC correctly reflects the content of the ICAO manual for aerodrome certification (Doc 9774), while the issue of aerodrome equipment will be addressed in a future rulemaking task. Finally, the title of Part E has been amended accordingly.

comment

905

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX II – Part-OR – ADR.OR.E.005 – Aerodrome manual (p56-57)
- ANNEX II – Part-OR – ADR.OR.E.010 – Structure of the aerodrome manual (p57-58)
- AMC/GM to ANNEX II – Part-OR – AMC1-ADR.OR.E.005 – Aerodrome manual (p109)
- AMC/GM to ANNEX II – Part-OR – AMC2-ADR.OR.E.005 – Aerodrome manual (p109-114)
- AMC/GM to ANNEX II – Part-OR – GM1-ADR.OR.E.010 – Aerodrome manual (p114-115)
- AMC/GM to ANNEX II – Part-OR – GM2-ADR.OR.E.005 –

Structure of the aerodrome manual (p114-115)

2. Justification and proposed text / comment

This comment is linked with comment 1177 in book I.

ADR.OR.E.010 – Structure of the aerodrome manual

This rule lays down the structure of the aerodrome manual. DGAC proposes to indicate that flexibility in the order of the part is possible (see proposition below).

ADR.OR.E.010 – Structure of the aerodrome manual

"The aerodrome manual shall contain or refer to all necessary information for the safe use, operation and maintenance of the aerodrome, its equipment, as well as its defined obstacle limitation surfaces and other surfaces. The main structure of the aerodrome manual shall ~~be as follows~~ include at least the following parts (the parts may be in a different order):

(a) Part A: General;

(b) Part B: Aerodrome management, safety management system, qualification and training requirements;

(c) Part C: Particulars of the aerodrome site;

(d) Part D: Particulars of the aerodrome required to be reported to the Aeronautical Information Service; and

(e) Part E: Particulars of the operating procedures of the aerodrome, its equipment and safety measures."

AMC1-ADR.OR.E. 005 – Aerodrome manual

This AMC deals with the structure of the aerodrome manual, so should be attached to ADR.OR.E.010 and not to ADR.OR.E. 005.

As written, paragraph (e) of this AMC should be in GM. It is proposed to move it to the proposed *GM1-ADR.OR.E.010 – Structure of the aerodrome manual* (see below).

Moreover, an aerodrome has not systematically an equipment manual which is more ATC's task. See DGAC's comment on equipment.

AMC1-ADR.OR.E.00510 – Structure of the aerodrome manual

"[...]"

~~*(e) The aerodrome manual may contain parts of, or refer to other controlled documents, such as aerodrome equipment manual, which are available at the aerodrome for use by the personnel"*~~

ADR.OR.E.005 and AMC2-ADR.OR.E.005 – Aerodrome manual

* This AMC deals with the structure of the aerodrome manual, so should be attached to ADR.OR.E.010 and not to ADR.OR.E.005.

* The mentioned content of the aerodrome manual is extremely detailed and there is a strong risk that it may not be adapted to all aerodromes originations.

The AMC should instead lay down the principles for the writing of the manual and the GM should provide detailed information such as the one proposed by the current AMC2-ADR.OR.E.005.

DGAC proposes thus to mention only general principles in AMC2: see below the proposed AMC2-ADR.OR.E.010, and to put the current content of AMC2-ADR.OR.E.005 to GM named "*GM1-ADR.OR.E.010 – Structure of the aerodrome manual*" (see below).

* The current content of AMC2-ADR.OR.E.005 is not consistent with the rule it is attached to. In particular, the titles of the parts are different from ADR.OR.E.010: see below the modifications of the proposed *GM1-ADR.OR.E.010 – Structure of the aerodrome manual*.

* The future content of the proposed *GM1-ADR.OR.E.010 – Structure of*

the aerodrome manual is to be harmonized with other comments detailed by DGAC in other comments on other subjects such as apron management services or equipment manual.

* In order to be consistent with the RFF requirements and terminology laid down in part OPS of the NPA, paragraph 4.4 of part C and paragraph 6.12 of part D of the proposed content of the manual should be use the terminology "*level of protection*" instead of "*category*".

* Paragraph 2.2.9 is related to emergency response planning which is already dealt with and even more detailed in paragraph 9 of part E of the proposed content of the manual.

Finally, as written, paragraph (c) of *ADR.OR.E.005 – Aerodrome manual* should be moved to GM, in particular because separating parts of the manual should remain just a possibility since it may be confusing.

Thus the following proposed modifications:

ADR.OR.E.005 – Aerodrome manual

"[...] ~~(c) The aerodrome manual may be issued in separate parts.~~ [...]"

AMC2-ADR.OR.E.010 – Structure of the aerodrome manual

"*The aerodrome should include at least the following information :*

- *description of aerodrome infrastructure, services and facilities,*
- *operating procedures,*
- *management systems, including safety, quality and security management and compliance monitoring function,*
- *any restriction on aerodrome availability.*

It should identify the safety accountability for each domain or activity described."

AMC2-GM1-ADR.OR.E.00510 – Structure of the aAerodrome manual

"(a) *The aerodrome manual may be issued in separate parts.*

(b) *The aerodrome manual may contain parts of, or refer to other controlled documents of the aerodrome operator, which are available at the aerodrome for use by the personnel.*

(c) *The aerodrome manual should include at least the following information:*

"[...]"

~~B. PART B – AERODROME ADMINISTRATION MANAGEMENT, SAFETY MANAGEMENT SYSTEM, **QUALIFICATION** AND TRAINING REQUIREMENTS INCLUDING SAFETY, AND QUALITY AND SECURITY MANAGEMENT FOR AERONAUTICAL DATA AND AERONAUTICAL INFORMATION PROVISION ACTIVITIES~~

[...]"

~~2.2.9 emergency response planning;~~

[...]"

~~C. PART C – PARTICULARS OF THE AERODROME SITE~~

[...]"

~~4.4 description of the physical characteristics of the aerodrome, elevations, visual and non-visual aids, as well as the information regarding the aerodrome reference temperature, strength of pavements, rescue and fire fighting level **of protection**, ground aids and main obstacles;~~

[...]"

~~D. PART **E** – PARTICULARS OF THE AERODROME REQUIRED TO BE REPORTED TO THE AERONAUTICAL INFORMATION SERVICE~~

[...]

6.7 the geographical coordinates and the top elevation of significant obstacles in the approach and take-off areas, in the circling area and in the vicinity surroundings of the aerodrome;

[...]

6.12 category level of protection of rescue and fire fighting; and

[...]

~~E. PART D~~ **E** — PARTICULARS OF THE AERODROME — OPERATING PROCEDURES AND SAFETY MEASURES — OPERATING PROCEDURES OF THE AERODROME, ITS EQUIPMENT AND SAFETY MEASURES

[...]

9. Aerodrome emergency plan including:

9.1 dealing with emergencies at the aerodrome or in its vicinity surroundings;

[...]

28. Procedures for the protection of radar and other navigational aids, control of activities, and ground maintenance in the vicinity surroundings of these installations.

[...]"

· GM1-ADR.OR.E.010 — Aerodrome manual and GM2-ADR.OR.E.005 — Structure of the aerodrome manual

GM1 deals with the aerodrome manual in general, so should be attached to OR.E.005 instead of OR.E.010.

GM2 deals with the Structure of the aerodrome manual, so should be attached to OR.E.010 instead of OR.E.005

Moreover, editorial improvements are proposed (see DGAC's general comment on the goal and writing of guidance materials).

GM1-ADR.OR.E.010 005 — Aerodrome manual

"FORM OF THE AERODROME MANUAL

[...] The reader of an aerodrome manual ~~should~~ **may** be given a clear statement of how safety is developed, managed and maintained on the aerodrome. [...]"

GM2-ADR.OR.E.005 010 — Structure of the aerodrome manual

"PURPOSE AND SCOPE OF THE AERODROME MANUAL

An efficient management structure and a systematic approach to aerodrome operation is essential. The aerodrome manual ~~should~~ **may** contain all the relevant information to describe this structure satisfactorily.

It is one of the means by which all aerodrome operating staff can be informed as to their duties and responsibilities with regard to safety. It ~~should~~ **may** describe the aerodrome infrastructure, services and facilities, all operating procedures, and any restrictions on aerodrome availability.

Accountability for safety must start at the very top of any organisation.

One of the key elements in establishing safe working practices is the 'top down' approach where all staff ~~should~~ **may** understand the safety aims of the organisation, the chain of command, and their own responsibilities and accountabilities. As safety management principles are applied, the aerodrome manual ~~should~~ **may** be expanded to describe clearly how the safety of operations is to be managed. To a reader or user of the aerodrome manual there ~~should~~ **may** never be any doubt in terms of 'safety accountability' for each domain or activity described. Each section ~~should~~ **may** define who is accountable, who is responsible, who has the authority, who has the expertise and who actually carries out the tasks described in any section.

*The principle objective of an aerodrome manual ~~should~~ **may** be to show how management will accomplish its safety responsibilities. The manual will set out the policy and expected standards of performance and the procedures by which they will be achieved.*

*The aerodrome operator ~~should~~ **may** ensure that:*

- the responsibilities of the aerodrome operator are clearly described;*
- the tasks and activities that are to be done by the aerodrome operator or its subcontractors are listed;*
- the means and procedures in order to complete these tasks and activities are described or appended, together with the necessary details on their frequencies and operating modes.*

*Where responsibilities are attributed to other stakeholders, the aerodrome manual ~~should~~ **may** clearly identify them."*

response Partially accepted

The Agency agrees that this was a discrepancy between the AMC2 and the relevant requirement ADR.OR.E.005. To better address this, the Agency has moved the first sentence of ADR.OR.E.010 to paragraph (b) of ADR.OR.E.005. In this way, the actual content of the requirements and the relevant AMC will be better organised. Moreover, the remaining paragraphs of ADR.OR.E.010 have also being integrated with ADR.OR.E.005 as its last paragraph.

However, the Agency considers that the content of the aerodrome manual, which is based on the ICAO aerodrome certification manual (ICAO Doc 9774), should remain at AMC level.

Finally, the Agency has amended the title of Part B and E of the AMC2 in the suggested direction and replaced the word 'vicinity' with the word 'surroundings'. In addition, the term 'level of protection' has been used and the Parts of the AMC have been renumbered as necessary.

comment **1135** comment by: *NATS National Air Traffic Services Limited*
Sub-paragraphs (a), (b) and (e) - These are statements and do not contain a "should" so should be GM. Suggest change to GM.

response *Noted*
The term 'may' is used to indicate an option available to the aerodrome operator.

comment **1197** comment by: *Federal Office of Civil Aviation FOCA*
The aerodrome manual may contain equipment manual. It is not clear what "equipment manual" means - please clarify or delete.

response *Noted*
This should be read in conjunction with AMC2 ADR.OR.E.005. The information required is: 'Maintenance and repair instructions, servicing information, troubleshooting and inspection procedures of aerodrome equipment', as required by the essential requirement of Annex Va of the Basic Regulation. A separate rulemaking task will address the issue of

aerodrome equipment.

comment 2209 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
please clarify what an equipment manual is or delete this.

response Noted
This should be read in conjunction with AMC2 ADR.OR.E.005. The information required is: 'Maintenance and repair instructions, servicing information, troubleshooting and inspection procedures of aerodrome equipment', as required by the essential requirement of Annex Va of the Basic Regulation. A separate rulemaking task will address the issue of aerodrome equipment.

comment 2645 comment by: *Fraport AG*
AMC/GM to Annex II - Part- OR Subpart E
General

The aerodrome manual should be designed as such, that a review and update of the manual is not an ongoing process. It should contain information to such a detail level that an update process is limited to a yearly update as a maximum. More detailed information should be given in referenced procedures, AIP, certification papers of relevant infrastructure. The manual should provide an overview of infrastructure and procedures but not copy their details. Otherwise revision, amendment and approval process would be overloaded.

response Noted
The aerodrome manual should be reviewed for its accuracy and suitability and amended as necessary, or when directed by the competent authority. For this reason, the aerodrome manual should be so designed that these actions are easily accomplished. The aerodrome manual may refer to other controlled documents.

NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART E – AERODROME MANUAL (ADR.OR.E) – AMC2-ADR.OR.E.005 – Aerodrome manual p. 109-114

comment 60 comment by: *CAA Norway*
Wrong letter in headline of AMC2-ADR.OR.E.005 D on page 112. Change "Part C" to "Part D".

response Accepted
The text has been amended accordingly.

comment 61 comment by: *CAA Norway*
Wrong letter in headline of AMC2-ADR.OR.E.005 E on page 113. Change

	"Part D" to "Part E".
response	<p>Accepted</p> <p>The text has been amended accordingly.</p>
comment	<p>136 comment by: CAA-NL</p> <p>We suggest to add under (11) responsible personnel for runway assessments and reporting of the condition of the movement area, because this requires more that to be able to assess the runway friction characteristics.</p>
response	<p>Accepted</p> <p>The text regarding the assessment and reporting of the condition of the movement has been added in paragraph 9 and the relevant text has been reworded.</p>
comment	<p>166 comment by: Swedavia AB - Swedish airports (currently 11 airports)</p> <p>Far too detailed. Move the paragraph AMC2-ADR.OR.E.005 — Aerodrome manual to Guidance Material.</p>
response	<p>Noted</p> <p>The AMC on the aerodrome manual is based on the ICAO aerodrome certification manual (Doc 9774). Moreover, the Agency considers that AMC is the appropriate level for the content of the aerodrome manual, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator.</p>
comment	<p>254 comment by: CAA Norway</p> <p>6.13; Is it really desirable to publish this in the AIP?.</p>
response	<p>Noted</p> <p>The Agency considers that this type of information is related to aircraft safety and needs to be published in the AIP, as provided for under paragraph (c) of ADR.OR.C.005.</p>
comment	<p>255 comment by: CAA Norway</p> <p>We suggest to delete "any" in 7.1 of AMC2-ADR.OR.E.005 E on page 113 to make this in line with the other requirements for changes.</p>
response	<p>Accepted</p> <p>The text has been modified accordingly.</p>
comment	<p>256 comment by: CAA Norway</p> <p>We suggest to insert text: "... for Apron Management if applicable, including:" in p. 16 of AMC2-ADR.OR.E.005 E. Not all aerodromes will</p>

	have Apron management service.
response	Partially accepted The issue of applicability of various provisions vis-à-vis the aerodrome manual has been dealt with separately (in the beginning of paragraph (a) of the AMC), since more than one item may not be applicable to an aerodrome. In any case, there are functions which normally fall in the remit of an apron management unit, and which still need to be ensured, even if an apron management unit is not provided at an aerodrome.
comment	257 comment by: CAA Norway We suggest to replace "control " with "services" in p. 16 of AMC2-ADR.OR.E.005 E. Not all aerodromes in the scope provide ATC. Some provide AFIS.
response	Accepted The text has been modified in this direction.
comment	258 comment by: CAA Norway AMC2-ADR.OR.E.005 E p. 20 on page 113 is partly covered in p. 11 on previous page. Suggest to change or combine with 11.
response	Accepted Subparagraph 9 (former 11) of Part E text has been amended to avoid the overlapping with subparagraph 20.
comment	299 comment by: CAA Austria - Ministry of Transport Adopt the structures of ICAO Doc 9774 Manual on Certification of aerodromes
response	Noted The relevant AMC is based on the ICAO aerodrome certification manual (Doc 9774).
comment	351 comment by: Avinor Page 109 - 113. Check headings and layout.
response	Accepted The Agency has reviewed and amended the headings and the layout of the AMC.
comment	484 comment by: Icelandic Civil Aviation Administration AMC2-ADR.OR.E.005 — Aerodrome manual. B. Part B heading - This heading is not according to the IR, suggest to correct according to the IR heading. Should therefore be: "Aerodrome management, safety management system, qualification and training requirements"

response	Accepted The heading has been amended in this direction.
comment	485 comment by: <i>Icelandic Civil Aviation Administration</i> Editorial: Wrong letter in headline of AMC2-ADR.OR.E.005 D on page 112. Change "Part C" to "Part D".
response	Accepted The text has been amended accordingly.
comment	486 comment by: <i>Icelandic Civil Aviation Administration</i> Editorial: Wrong letter in headline of AMC2-ADR.OR.E.005 E on page 113. Change "Part D" to "Part E".
response	Accepted The text has been amended accordingly.
comment	487 comment by: <i>Icelandic Civil Aviation Administration</i> AMC2-ADR.OR.E.005 — Aerodrome manual. E. Part D heading - Not the same as the IR. Suggest correction. Should be: "Particulars of the operating procedures of the aerodrome, its equipment and safety measures" (Note also former comment on the numbering, should be E. Part E.)
response	Accepted The text has been amended accordingly.
comment	488 comment by: <i>Icelandic Civil Aviation Administration</i> We suggest to delete "any" in 7.1 of AMC2-ADR.OR.E.005 E on page 113 to make this in line with the other requirements for changes.
response	Accepted The text has been modified accordingly.
comment	489 comment by: <i>Icelandic Civil Aviation Administration</i> We suggest to insert text: "... for Apron Management if applicable, including:" in p. 16 of AMC2-ADR.OR.E.005 E. Not all aerodromes will have Apron management service.
response	Partially accepted The issue of applicability of various provisions vis-à-vis the aerodrome manual has been dealt with separately (in the beginning of paragraph (a) of the AMC), since more than one item may not be applicable to an aerodrome. In any case, there are functions which normally fall in the remit of an apron management unit, and which still need to be ensured,

even if an apron management unit is not provided at an aerodrome.

comment 490 comment by: *Icelandic Civil Aviation Administration*
We suggest to replace "control " with "services" in p. 16 of AMC2-ADR.OR.E.005 E.
Not all aerodromes in the scope provide ATC. Some provide AFIS.

response Accepted
The text has been modified in this direction.

comment 491 comment by: *Icelandic Civil Aviation Administration*
AMC2-ADR.OR.E.005 E p. 20 on page 113 is partly covered in p. 11 on previous page. Suggest to change or combine with 11.

response Accepted
The text has been amended to avoid the overlapping.

comment 548 comment by: *Flughafen Düsseldorf GmbH*
Die Gliederung sollte überprüft und optimiert werden.
Part B) 2) 2.2) Das ist hier viel zu detailliert. Querverweise auf andere Dokumente bzw. Tools müssen möglich sein.
Eine Überführung der detaillierten Inhaltsbeschreibungen in das GM wäre sinnvoller.

response Noted
The content of this subparagraph reflects the elements of the safety management system, which may also be in a separate manual (safety management manual)

comment 559 comment by: *Vienna International Airport*
Adopt the structures of ICAO Doc 9774 Manual on Certification of aerodromes Appendix 1

response Noted
The relevant AMC is based on the ICAO aerodrome certification manual (Doc 9774).

comment 599 comment by: *Brussels Airport - BRU/EBBR*
ADR.OR.E.005(c) & ADR.OR.E.010 & AMC2-ADR.OR.E.005
To line up the text unequivocally in these 3 paragraphs
ADR.OR.E.005(c) states : "The aerodrome manual may be issued in separate parts."

ADR.OR.E.010 states : "The main structure of the aerodrome manual shall be as follows : ..."

AMC2-ADR.OR.E.005 states : "The aerodrome manual should include at least the following information : ", which is then followed by the same structure in Parts A through E as mentioned in ADR.OR.E.010.

I'd like to see the text (vocabulary) lined up in these 3 paragraphs.

response

Noted

Requirement ADR.OR.E.005(c) gives the possibility to break down the aerodrome manual into various parts, which, however, have to contain the the information contained in ADR.OR.E.010 (the respective part of the latter requirement has now become paragraph (m) of ADR.OR.E.005(c)). However, in the AMC the structure and the content of the aerodrome manual are specified in more detail. The use of the term 'shall' is not possible in an AMC, in order to be in line with its definition contained in article 2 of the draft Regulation. Indeed, the agreed convention is to use the verb 'should' in the AMC, while the term 'may' is also used to indicate an option for the aerodrome operator.

comment

793 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- A. Explanatory Note - II. Process and scope (p5,6): note 2
- Draft Commission Regulation (p2-5): §12
- ANNEX I - Part-AR - ADR.AR.C.005 — Oversight (p23)
- ANNEX I - Part-AR - ADR.AR.C.050 — Declarations of providers of apron management services (p27-28)
- ANNEX I - Part AR - APPENDIX I (p32-33)
- ANNEX I - Part AR - APPENDIX II (p34-36)
- ANNEX II - Part-OR - ADR.OR.B.060 — Declaration of providers of apron management services (p43-44)
- ANNEX II - Part-OR - APPENDIX II (p61-62)
- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.A.030(d) — Immediate reaction to a safety problem (p3)
- AMC/GM to ANNEX I — Part-AR — AMC1-ADR.AR.C.005 — Oversight (p18)
- AMC/GM to ANNEX II — Part-OR — AMC2-ADR.OR.E.005 — Aerodrome manual (p109-114) - part E - 16

2. General comment

This comment is **critical**.

As it is said in the explanatory note (*II. Process and scope, note 2, pages 5-6*), the Agency did not undertake the development of safety rules for apron management services but later on will initiate a joint group with ATM. However, some procedural rules related to those services are included in the proposed rules.

DGAC considers it is essential to provide the flexibility needed to conduct further debates that will take place in the given joint group.

In particular, the connection between the aerodrome operator and providers of apron management service can not be established without

further debates. Indeed, providers of apron management services, when existing, can be independent from the aerodrome operator, with arrangements between these two entities. For example in CDG airport, providers of apron management services are not subcontractors of the CDG operator. Moreover, there is a risk of inconsistency with what will be proposed by the joint group that will propose draft regulation on that point.

Therefore, the procedural rules included in the proposed implementing rules and corresponding AMC/GM shall remain at a high level stage only.

The provisions of the NPA that would consequently need to be revised are dealt with case by case in the proposed texts/comments below:

3. Justification and proposed texts / comments

This comment is linked with comment 23 in Explanatory note and 1033 in book I.

· ADR.AR.C.005 — Oversight: Paragraph (a)(2)

DGAC understands the certification basis is not applicable to providers of apron management services, but it's not clear in paragraph (a)(2) of ADR.AR.C.005.

Providers of apron management services declare their compliance to applicable requirements only, thus the proposed change:

"(a) [...]"

(2) continued compliance, with the certification basis and/or applicable requirements [...]"

· ADR.AR.C.050 — Declarations of providers of apron management services

Considering what is said in the general comment just above and the fact that providers of apron management services are not subcontractors of the aerodrome operator, it would be inappropriate, when the competent authority has to notify something to the apron management services, to systematically notify it also to the aerodrome operator. Moreover, this could induce more delays to solve the problem as it could be understood that the corrective action is to be done by other entities.

Finally, as this is not a requirement, the wording "*if required*" should be replaced by "*when deemed necessary*".

Thus DGAC proposes to modify paragraph (b) of ADR.AR.C.050 as follows:
"If the declaration does not contain the required information, or contains information that indicates non-compliance with applicable requirements, the competent authority shall notify the provider of apron management services about the non-compliance and request further information. ~~and If deemed necessary, the competent authority can address a copy of this notification to the aerodrome operator about the non-compliance and request further information. If required-deemed necessary, the competent authority shall carry out an inspection of the provider of apron management services and the aerodrome operator. If the non-compliance is confirmed, the competent authority shall take action as defined in ADR.AR.C.055 towards the apron management service"~~

· Part AR - APPENDIX I and APPENDIX II

The name of the provider of apron management service should not be part of the certificate of the aerodrome operator because they can be independent.

APPENDIX I

"[...]"

TERMS OF APPROVAL	
Provision of apron management services:	Specify name of service provider

"[...]"

APPENDIX II

"[...]"

~~Apron management services are provided by [specify name of service provider].~~

"[...]"

· ADR.OR.B.060 — Declaration of providers of apron management services

Paragraph (a): DGAC doesn't understand the pertinence of having an agreement with an aerodrome operator.

~~"(a) The provider of apron management services, following an agreement with an aerodrome operator for the provision of such services at an aerodrome, shall:"~~

Paragraph (a)(5): DGAC finds this provision goes too far. Moreover, nobody will verify that the provider of apron management service complies with the aerodrome manual; in particular it's absolutely not the aerodrome operator's task.

~~"(5) provide its services in accordance with the aerodrome manual and comply with all relevant provisions contained therein"~~

Paragraph (b): DGAC doesn't understand the pertinence of notifying the aerodrome operator when ceasing activity.

~~"(b) Before ceasing the provision of such services, the provider of apron management services shall notify the competent authority and the aerodrome operator."~~

· Part-OR - APPENDIX II

In order to be clearer, DGAC proposes to clarify that these declarations of the providers of apron management services are declarations "of compliance" (see the proposed titles below).

Moreover, it is essential to delete "The service is provided in accordance with the content of the relevant aerodrome manual" as this is absolutely not high level and as it may induce a risk of inconstancy with the future rules on apron management services.

"Appendix II to Annex II

Declaration of compliance

In accordance with Commission Regulation (EC) No XXX/2013 laying down requirements and procedures related to aerodromes pursuant to Regulation (EC) No 216/ 2008 of the European Parliament and of the Council

[...]

~~ð The service is provided in accordance with the content of the relevant aerodrome manual.~~

[...]

ð (If applicable) The operator has implemented and demonstrated

conformance to an officially recognised industry standard.
Reference of the standard: Certification body:
Date of the last conformance audit:

[...]

· AMC1-ADR.AR.A.030(d) — Immediate reaction to a safety problem

AMC1-ADR.AR.A.030(d) is to be deleted:

~~"**AMC1-ADR.AR.A.030(d) — Immediate reaction to a safety problem**
NOTIFICATION OF MEASURES~~

~~*In case that the competent authority directs a measure to a provider apron management services, then these measures should also be notified to the aerodrome operator."*~~

· AMC1-ADR.AR.C.005 — Oversight

High level provisions in this NPA state that apron management services shall provide a declaration to the competent authority when appropriate. But the oversight of the "continued competence" goes beyond this statement and therefore merits further debates.

Moreover, the word "*qualified*" should be avoided considering it is referring to very specific terminology laid down in directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions.

Thus the following proposed changes to this AMC:

AMC1-ADR.AR.C.005 — Oversight

"GENERAL

(a) The competent authority should assess the aerodrome operator and monitor its continued competence to conduct safe operations in compliance with the applicable requirements and the certification basis. Similarly, the competent authority should monitor the continued competence of providers of apron management services. The competent authority should ensure that accountability for assessing and monitoring aerodrome operators as well as providers apron management services is clearly defined. This accountability may be delegated or shared, in whole or in part.

(b) It is essential that the competent authority shall have the full capability to adequately assess the continued competence of an aerodrome operator or a provider of apron management services by ensuring that the whole range of activities is assessed by appropriately qualified trained personnel."

· AMC2-ADR.OR.E.005 — Aerodrome manual

AMC2-ADR.OR.E.005 includes in the aerodrome manual the procedures for apron management. This is not high level provision and strongly needs further debates, because the relevancy of having apron management procedures in the aerodrome manual is not proven.

For instance, it is possible to imagine a system where the providers of apron management service have their own procedures and the aerodrome operator has nothing to do with them. Chapter 16 of part E of the structure of the aerodrome manual is to be deleted.

Note: DGAC also proposes to put the content of this AMC to GM because of the high level of details that doesn't fit to all organization. See comment xx.

"~~AMC2GM1-ADR.OR.E.00510~~ - Structure of aerodrome manual

[...]

~~16. Procedures for apron management including:~~

~~16.1 transfer of the aircraft between air traffic control and the apron management unit;~~

~~16.2 allocation of aircraft parking positions;~~

~~16.3 engine start and aircraft push back;~~

~~16.4 marshalling and follow-me service.~~

[...]"

response

Noted

The AMC on the aerodrome manual is based on the ICAO aerodrome certification manual (Doc 9774). Moreover, the Agency considers that AMC is the appropriate level for the content of the aerodrome manual, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator. The aerodrome manual may also refer to other documents.

comment

824 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- A. Explanatory Note - EXECUTIVE SUMMARY (p2)
- A. Explanatory Note - II. Process and scope (p5,6): note 1
- A. Explanatory Note - III. Overview of the rules proposed in this NPA - Certification process including the establishment of the certification basis (CB) (p9): (23) (24)
- Draft Commission Regulation (p2-5): §11
- ANNEX II - Part-OR - ADR.OR.D.035 — Record keeping (p55)
- AMC/GM to ANNEX I — Part-AR — GM1-ADR.AR.C.055 — Findings, corrective actions and enforcement measures (p34)
- AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.E.005 — Aerodrome manual (p109)
- AMC/GM to ANNEX II — Part-OR — AMC2-ADR.OR.E.005 — Aerodrome manual (p109-114)

2. Justification and proposed text / comment

This comment is linked with comment 24 in Explanatory Note and 1078 in book II.

As indicated in the explanatory note (pages 2, 5, 6 and 9), requirements for the certification of aerodrome equipment, as well as for the oversight of designers and producers of safety-critical aerodrome equipment will follow at a later stage jointly with the work to be done for specific ATM systems and constituents. This work will probably help knowing which equipment is ATM and which is aerodrome, knowing that most of it is ATM equipment.

Therefore, the aerodrome equipment should not be part of the aerodrome manual since lots of it is air traffic management equipment. Moreover, the pertinence of having a manual for aerodrome equipment in charge of the aerodrome operator is not proved and merits further debates.

Consequently:

- the first bullet of **GM1-ADR.AR.C.055 is to be deleted**

- Paragraph 4.3 of Part C of the content of the aerodrome manual of the proposed GM1-ADR.OR.E.010 — *Structure of the aerodrome manual* is to be deleted, all the more that outside the boundaries of the aerodrome, the aerodrome operator is no more competent;
- Paragraph 13 of Part E of the content of the aerodrome manual of the proposed GM1-ADR.OR.E.010 — *Structure of the aerodrome manual* is to be deleted

"ADR.OR.D.035 – Record-keeping

[...]

(d) [...]

(3) ~~manuals of aerodrome equipment or systems employed at the aerodrome, for as long as they are used at the aerodrome~~

[...]"

GM1-ADR.AR.C.055 – Findings, corrective actions and enforcement measures

"CATEGORIES OF FINDINGS – DOCUMENTARY EVIDENCE

Examples of documentary evidence include but is not limited to:

~~aerodrome or equipment manuals;~~

[...]"

AMC2-GM1-ADR.OR.E.00510 – Structure of the aerodrome manual

"[...]

C. PART C – PARTICULARS OF THE AERODROME SITE

[...]

4.3 ~~a plan showing the location of any aerodrome facilities and equipment outside the boundaries of the aerodrome;~~

[...]

E. PART ~~D~~ E – PARTICULARS OF THE AERODROME OPERATING PROCEDURES AND SAFETY MEASURES OPERATING PROCEDURES OF THE AERODROME, ITS EQUIPMENT AND SAFETY MEASURES

[...]

~~13. Maintenance and repair instructions, servicing information, troubleshooting and inspection procedures of aerodrome equipment~~

[...]"

response Partially accepted

The AMC on the aerodrome manual is based on the ICAO aerodrome certification manual (Doc 9774). Moreover, the Agency considers that AMC is the appropriate level for the content of the aerodrome manual, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator.

With regard to the comment on the 'aerodrome equipment', the Agency considers that the relevant paragraphs of the AMC are in line with the relevant essential requirements of Annex Va ((A(3)(f), B(1)(h)) and paragraph 1.4.4 of Annex 14 (aerodrome manual), while there are also other aerodrome equipment such RFFS vehicles, CFME, which are not related to ATM.

comment 834

comment by: Finnish Transport Safety Agency

response	<p>Editorial: Wrong letter in headline of AMC2-ADR.OR.E.005 D on page 112. Change "Part C" to "Part D".</p> <p>Accepted</p> <p>The text has been amended accordingly.</p>
comment	<p>835 <i>comment by: Finnish Transport Safety Agency</i></p> <p>Editorial: Wrong letter in headline of AMC2-ADR.OR.E.005 E on page 113. Change "Part D" to "Part E".</p>
response	<p>Accepted</p> <p>The text has been amended accordingly.</p>
comment	<p>836 <i>comment by: Finnish Transport Safety Agency</i></p> <p>We suggest to insert text: "... for Apron Management if applicable, including:" in p. 16 of AMC2-ADR.OR.E.005 E. Not all aerodromes will have Apron management service. (256)</p>
response	<p>Partially accepted</p> <p>The issue of applicability of various provisions vis-à-vis the aerodrome manual has been dealt with separately (in the beginning of paragraph (a) of the AMC), since more than one item may not be applicable to an aerodrome. In any case, there are functions which normally fall in the remit of an apron management unit, and which still need to be ensured, even if an apron management unit is not provided at an aerodrome.</p>
comment	<p>837 <i>comment by: Finnish Transport Safety Agency</i></p> <p>We suggest to replace "control " with "services" in p. 16 of AMC2-ADR.OR.E.005 E. Not all aerodromes in the scope provide ATC. Some provide AFIS. (257)</p>
response	<p>Accepted</p> <p>The text has been modified in this direction.</p>
comment	<p>905 ❖ <i>comment by: DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• ANNEX II — Part-OR — ADR.OR.E.005 — Aerodrome manual (p56-57)• ANNEX II — Part-OR — ADR.OR.E.010 — Structure of the aerodrome manual (p57-58)• AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.E.005 — Aerodrome manual (p109)• AMC/GM to ANNEX II — Part-OR — AMC2-ADR.OR.E.005 — Aerodrome manual (p109-114)• AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.E.010 — Aerodrome manual (p114-115)• AMC/GM to ANNEX II — Part-OR — GM2-ADR.OR.E.005 —

Structure of the aerodrome manual (p114-115)

2. Justification and proposed text / comment

This comment is linked with comment 1177 in book I.

· ADR.OR.E.010 – Structure of the aerodrome manual

This rule lays down the structure of the aerodrome manual. DGAC proposes to indicate that flexibility in the order of the part is possible (see proposition below).

ADR.OR.E.010 – Structure of the aerodrome manual

"The aerodrome manual shall contain or refer to all necessary information for the safe use, operation and maintenance of the aerodrome, its equipment, as well as its defined obstacle limitation surfaces and other surfaces. The main structure of the aerodrome manual shall ~~be as follows~~ include at least the following parts (the parts may be in a different order):

(a) Part A: General;

(b) Part B: Aerodrome management, safety management system, qualification and training requirements;

(c) Part C: Particulars of the aerodrome site;

(d) Part D: Particulars of the aerodrome required to be reported to the Aeronautical Information Service; and

(e) Part E: Particulars of the operating procedures of the aerodrome, its equipment and safety measures."

· AMC1-ADR.OR.E. 005 – Aerodrome manual

This AMC deals with the structure of the aerodrome manual, so should be attached to ADR.OR.E.010 and not to ADR.OR.E. 005.

As written, paragraph (e) of this AMC should be in GM. It is proposed to move it to the proposed *GM1-ADR.OR.E.010 – Structure of the aerodrome manual* (see below).

Moreover, an aerodrome has not systematically an equipment manual which is more ATC's task. See DGAC's comment on equipment.

AMC1-ADR.OR.E.00510 – Structure of the aerodrome manual

"[...]

(e) ~~The aerodrome manual may contain parts of, or refer to other controlled documents, such as aerodrome equipment manual, which are available at the aerodrome for use by the personnel"~~

· ADR.OR.E.005 and AMC2-ADR.OR.E.005 – Aerodrome manual

* This AMC deals with the structure of the aerodrome manual, so should be attached to ADR.OR.E.010 and not to ADR.OR.E.005.

* The mentioned content of the aerodrome manual is extremely detailed and there is a strong risk that it may not be adapted to all aerodromes originations.

The AMC should instead lay down the principles for the writing of the manual and the GM should provide detailed information such as the one proposed by the current AMC2-ADR.OR.E.005.

DGAC proposes thus to mention only general principles in AMC2: see below the proposed AMC2-ADR.OR.E.010, and to put the current content of AMC2-ADR.OR.E.005 to GM named *"GM1-ADR.OR.E.010 – Structure of the aerodrome manual"* (see below).

* The current content of AMC2-ADR.OR.E.005 is not consistent with the rule it is attached to. In particular, the titles of the parts are different from ADR.OR.E.010: see below the modifications of the proposed GM1-ADR.OR.E.010 – Structure of the aerodrome manual.

* The future content of the proposed *GM1-ADR.OR.E.010 – Structure of*

the aerodrome manual is to be harmonized with other comments detailed by DGAC in other comments on other subjects such as apron management services or equipment manual.

* In order to be consistent with the RFF requirements and terminology laid down in part OPS of the NPA, paragraph 4.4 of part C and paragraph 6.12 of part D of the proposed content of the manual should be use the terminology "*level of protection*" instead of "*category*".

* Paragraph 2.2.9 is related to emergency response planning which is already dealt with and even more detailed in paragraph 9 of part E of the proposed content of the manual.

Finally, as written, paragraph (c) of *ADR.OR.E.005 – Aerodrome manual* should be moved to GM, in particular because separating parts of the manual should remain just a possibility since it may be confusing.

Thus the following proposed modifications:

ADR.OR.E.005 – Aerodrome manual

"[...] ~~(c) The aerodrome manual may be issued in separate parts.~~ [...]"

AMC2-ADR.OR.E.010 – Structure of the aerodrome manual

"The aerodrome should include at least the following information :

- description of aerodrome infrastructure, services and facilities,
- operating procedures,
- management systems, including safety, quality and security management and compliance monitoring function,
- any restriction on aerodrome availability.

It should identify the safety accountability for each domain or activity described."

AMC2-GM1-ADR.OR.E.00510 – Structure of the aAerodrome manual

"(a) The aerodrome manual may be issued in separate parts.

(b) The aerodrome manual may contain parts of, or refer to other controlled documents of the aerodrome operator, which are available at the aerodrome for use by the personnel.

(c) The aerodrome manual should include at least the following information:

"[...]"

~~B. PART B – AERODROME ADMINISTRATION MANAGEMENT, SAFETY MANAGEMENT SYSTEM, QUALIFICATION AND TRAINING REQUIREMENTS INCLUDING SAFETY, AND QUALITY AND SECURITY MANAGEMENT FOR AERONAUTICAL DATA AND AERONAUTICAL INFORMATION PROVISION ACTIVITIES~~

[...]"

~~2.2.9 emergency response planning;~~

[...]"

~~C. PART C – PARTICULARS OF THE AERODROME SITE~~

[...]"

~~4.4 description of the physical characteristics of the aerodrome, elevations, visual and non-visual aids, as well as the information regarding the aerodrome reference temperature, strength of pavements, rescue and fire fighting level of protection, ground aids and main obstacles;~~

[...]"

~~D. PART **D** – PARTICULARS OF THE AERODROME REQUIRED TO BE REPORTED TO THE AERONAUTICAL INFORMATION SERVICE~~

[...]
6.7 the geographical coordinates and the top elevation of significant obstacles in the approach and take-off areas, in the circling area and in the vicinity surroundings of the aerodrome;

[...]
6.12 category level of protection of rescue and fire fighting; and

[...]
E. PART ~~D~~ **E** — PARTICULARS OF THE AERODROME — OPERATING PROCEDURES AND SAFETY MEASURES — OPERATING PROCEDURES OF THE AERODROME, ITS EQUIPMENT AND SAFETY MEASURES

[...]
9. Aerodrome emergency plan including:
9.1 dealing with emergencies at the aerodrome or in its vicinity surroundings;

[...]
28. Procedures for the protection of radar and other navigational aids, control of activities, and ground maintenance in the vicinity surroundings of these installations.

[...]"

· GM1-ADR.OR.E.010 — Aerodrome manual and GM2-ADR.OR.E.005 — Structure of the aerodrome manual

GM1 deals with the aerodrome manual in general, so should be attached to OR.E.005 instead of OR.E.010.

GM2 deals with the Structure of the aerodrome manual, so should be attached to OR.E.010 instead of OR.E.005

Moreover, editorial improvements are proposed (see DGAC's general comment on the goal and writing of guidance materials).

GM1-ADR.OR.E.010 005 — Aerodrome manual

"FORM OF THE AERODROME MANUAL

[...] The reader of an aerodrome manual ~~should~~ **may** be given a clear statement of how safety is developed, managed and maintained on the aerodrome. [...]"

GM2-ADR.OR.E.005 010 — Structure of the aerodrome manual

"PURPOSE AND SCOPE OF THE AERODROME MANUAL

An efficient management structure and a systematic approach to aerodrome operation is essential. The aerodrome manual ~~should~~ **may** contain all the relevant information to describe this structure satisfactorily.

It is one of the means by which all aerodrome operating staff can be informed as to their duties and responsibilities with regard to safety. It ~~should~~ **may** describe the aerodrome infrastructure, services and facilities, all operating procedures, and any restrictions on aerodrome availability.

Accountability for safety must start at the very top of any organisation.

One of the key elements in establishing safe working practices is the 'top down' approach where all staff ~~should~~ **may** understand the safety aims of the organisation, the chain of command, and their own responsibilities and accountabilities. As safety management principles are applied, the aerodrome manual ~~should~~ **may** be expanded to describe clearly how the safety of operations is to be managed.

To a reader or user of the aerodrome manual there ~~should~~ **may** never be any doubt in terms of 'safety accountability' for each domain or activity described. Each section ~~should~~ **may** define who is accountable, who is responsible, who has the authority, who has the expertise and who actually carries out the tasks described in any section.

*The principle objective of an aerodrome manual ~~should~~ **may** be to show how management will accomplish its safety responsibilities. The manual will set out the policy and expected standards of performance and the procedures by which they will be achieved.*

*The aerodrome operator ~~should~~ **may** ensure that:*

- the responsibilities of the aerodrome operator are clearly described;*
- the tasks and activities that are to be done by the aerodrome operator or its subcontractors are listed;*
- the means and procedures in order to complete these tasks and activities are described or appended, together with the necessary details on their frequencies and operating modes.*

*Where responsibilities are attributed to other stakeholders, the aerodrome manual ~~should~~ **may** clearly identify them."*

response

Partially accepted

The Agency accepts that there was a discrepancy between the AMC2 and the relevant requirement ADR.OR.E.005. To better address this, the Agency has moved the first sentence of ADR.OR.E.010 to paragraph (b) of ADR.OR.E.005, while its remaining part became paragraph (m) of ADR.OR.E.005. In this way, the actual content of the requirements and the relevant AMC are better organised. However, the Agency considers that that the content of the aerodrome manual, which is based on the ICAO aerodrome certification manual (ICAO Doc 9774), should remain at AMC level, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator.

Moreover, the Agency has amended the title of Part B and E of the AMC2 in the suggested direction and replace the word 'vicinity' with the word 'surroundings'. In addition, the term 'level of protection' has been used in the AMC, while the Parts of the AMC have been reviewed and renumbered as necessary.

comment

1029

comment by: *Swedish Regional Airport Association*

Move to GM! Format should not be regulated! (format variation necessary)

response

Noted

The AMC on the aerodrome manual is based on the ICAO aerodrome certification manual (Doc 9774). Moreover, the Agency considers that AMC is the appropriate level for the content of the aerodrome manual, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator.

comment

1173

comment by: *Salzburger Flughafen GmbH*

Adopt the structures of ICAO Doc 9774 Manual on Certification of aerodromes Appendix 1

response

Noted

The relevant AMC is based on the ICAO aerodrome certification manual (Doc 9774).

comment 1198 comment by: *Federal Office of Civil Aviation FOCA*
FOCA suggests to take over the structure of the aerodrome manual mentioned in ICAO Doc. 9774.

response Noted
The relevant AMC is based on the ICAO aerodrome certification manual (Doc 9774).

comment 1296 ❖ comment by: *DGAC Direction Générale de l'aviation civile*
1. Affected paragraphs

- AMC/GM to ANNEX II - Part-OR - AMC2-ADR.OR.D.005(b)(7) – Management (p89)
- AMC/GM to ANNEX II – Part-OR – AMC2-ADR.OR.E.005 – Aerodrome manual (p109-114)

2. Justification and proposed text / comment

AMC2-ADR.OR.D.005(b)(7) is not related to ADR.OR.D.005 which deals only with improvement of the SMS. Furthermore, it may be inconsistent with future regulation IR-ADQ.

Thus DGAC proposes to delete AMC2-ADR.OR.D.005(b)(7) and to make the following change in the content of the proposed GM1-ADR.OR.E.010 – Structure of the aerodrome manual:

AMC2-GM1-ADR.OR.E.00510 – Structure of the aerodrome manual

"[...]

B. PART B [...]

~~2.4 A description of quality and security management system for aeronautical data and aeronautical information provision activities and related procedures.~~

[...]"

response Partially accepted
The AMC on the aerodrome manual is based on the ICAO aerodrome certification manual (Doc 9774). Moreover, the Agency considers that AMC is the appropriate level for the content of the aerodrome manual, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator. Moreover, the Agency has amended the text of the AMC to better reflect the content of the relevant requirement on aeronautical data management, which is based on the relevant essential requirement on aeronautical data contained in Annex Va of the Basic Regulation.

comment 1452 comment by: *Swedish Transport Agency*
Move the paragraph AMC2-ADR.OR.E.005 – Aerodrome manual to Guidance Material.

response	Noted The AMC on the aerodrome manual is based on the ICAO aerodrome certification manual (Doc 9774). Moreover, the Agency considers that AMC is the appropriate level for the content of the aerodrome manual, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator.
comment	1453 comment by: <i>Swedish Transport Agency</i> Editorial: Wrong letter in headline of AMC2-ADR.OR.E.005 D on page 112. Change "Part C" to "Part D".
response	Accepted The text has been amended accordingly.
comment	1454 comment by: <i>Swedish Transport Agency</i> Editorial: Wrong letter in headline of AMC2-ADR.OR.E.005 E on page 113. Change "Part D" to "Part E".
response	Accepted The text has been amended accordingly.
comment	1468 comment by: <i>Flughafen Graz Betriebs GmbH</i> Adopt the structures of ICAO Doc 9774 Manual on Certification of aerodromes Appendix 1
response	Noted The relevant AMC is based on the ICAO aerodrome certification manual (Doc 9774).
comment	1588 comment by: <i>Geneva International Airport (ROMIG)</i> The articles are all in Italics for no reason. There are inconsistencies with the lettering of the headings. Check formatting consistency.
response	Accepted The Agency has made the necessary changes to the headings and has reviewed the text to identify any other changes needed to the format of the text.
comment	1631 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i> adopt the structures of ICAO doc 9774 Manual on Certification of Aerodromes - Appendix 1
response	Noted

The relevant AMC is based on the ICAO aerodrome certification manual (Doc 9774).

comment

1792

comment by: CAA CZ

Comment by Karlovy Vary airport

We proposed modified and new wording of following paragraph :

AMC2-ADR.OR.E.005 — Aerodrome manual

The aerodrome manual should include at least the following information:

Cover page signed by the Accountable Manager

Content of the manual

A. PART A — GENERAL

Details of the person(s) responsible for the administration of the aerodrome manual and its revisions.

0. Administration and control of the aerodrome manual including the following:

0.1.3 a list and brief description of the various parts, their contents, applicability and use;

Applicability

Part AA

all aerodrome operator staff

Part AB

all aerodrome operator staff, all handling

companies staff?

New text

0.1.3 List of aerodrome manual parts/sections and their applicability for aerodrome users.

0.1.4 explanations, abbreviations and definitions of terms needed for the use of the manual;

0.2 System of amendment and revision:

2.2. A description or reference to the description of the safety management system, including:

2.2.1 scope of the safety management system;

2.2.2 safety policy and objectives;

2.2.3 safety responsibilities of key safety personnel;

2.2.4 documentation control procedures;

2.2.5 hazard identification and risk management schemes;

2.2.6 monitoring of implementation and effectiveness of safety actions and risk mitigation measures;

2.2.7 safety performance monitoring;

2.2.8 safety reporting and investigation;

2.2.9 emergency response planning;

2.2.10 management of change (including organisational changes with regard to safety responsibilities); and

2.2.11 safety promotion.

Companies with implemented SMS have already a SMS Manual in place which describes the above mentioned aspects of their SMS. This requirement means duplicity of the SMS aspects in two manuals.

2.3 A description or reference to the description of the compliance monitoring function and related procedures.

Remark:

Companies with implemented QMS or Compliance monitoring have already a Quality Manual in place which describes the above mentioned aspects of their QMS. This requirement means duplicity of the QMS aspects in two manuals.

3. Procedures or reference to the procedures related to training including the following:

3.1 training programme, including frequencies, syllabi and checking programmes for all personnel involved in the operation, maintenance and management of the aerodrome and those persons operating unescorted on the movement area and other operational areas of the aerodrome. Training syllabi and checking programmes should be developed in accordance with the requirements pertaining to their duties, as prescribed in Part-ADR.OPS.

3.2 procedures:

3.2.1 for training and checking;

3.2.2 to be applied in the event that personnel do not achieve or maintain the required standards.

response

Noted

The Agency has reviewed the text and it was found to be adequate for the purpose.

In addition, the aerodrome operator does not need to duplicate the SMS manual; this is also stated in AMC2-ADR.OR.D.005(c) and GM1-ADR.OR.D.005(c) which refer specifically to the case of separate SMS manual. The same applies for the case of separate Quality Manual, provided all necessary information is already included in this manual.

comment

2139

comment by: *Danish Transport Authority*

The beginning of the paragraph should be modified to "The aerodrome manual should include at least the following content, and if not the reason for deselection:"

response

Accepted

The text has been amended in this direction.

comment

2140

comment by: *Danish Transport Authority*

(3.1) The paragraph should include all specified objects described under Training Programme AMC1-ADR.OR.D.015 (g).

response

Accepted

The paragraph has been amended accordingly.

comment

2188

comment by: *Flughafen Klagenfurt*

Adopt the structures of ICAO Doc 9774 Manual on Certification of aerodromes Appendix 1

response

Noted

The relevant AMC is based on the ICAO aerodrome certification manual (Doc 9774).

comment 2212 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*

The structure of an aerodrome manual has already been defined in ICAO Doc. 9774. We suggest using the existing structure as this will save a great deal of time and money.

response *Noted*

The relevant AMC is based on the ICAO aerodrome certification manual (Doc 9774).

comment 2292 comment by: *Roskilde Airport*

Roskilde Airport (EKRK):
The aerodrome manual should not contain specific procedures for quality and specs of fuel. Justification: Such matters are the responsibility of the fuel facility Owner/operator, who has the knowhow and legal/environmental obligations.

response *Noted*

The content of the aerodrome manual is based on the on the ICAO aerodrome certification manual (Doc 9774), the relevant Implementing Rules and the requirements already contained in the Basic Regulation; the latter specifically mentions the issue of fuel quality.

comment 2301 comment by: *CAA Norway*

We suggest to move AMC2-ADR.OR.E.005 on page 109 to GM. Too detailed for an AMC.

response *Noted*

The AMC on the aerodrome manual is based on the ICAO aerodrome certification manual (Doc 9774). Moreover, the Agency considers that AMC is the appropriate level for the content of the aerodrome manual, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator.

comment 2498 comment by: *CAA SR*

Put parts of AD manual in logical order. E.g. Emergency services should together - Rescue and Firefighting services, Removal of disabled aircraft and Emergency plan should follow each other. CAA SR proposes following order of Part D subparts:

- 7. Aerodrome reporting*
- 8. Procedures for accessing the aerodrome movement area*
- 9. Procedures for the control of vehicles operating on or in the vicinity or the movement area, including traffic rules, speed limits, and method for issuing driving permits and enforcement means*

10. Procedures for apron safety management
11. Procedures for apron management
12. Procedures for aerodrome works
13. ...

response Accepted

The text has been amended in this direction.

comment

2645 ❖

comment by: *Fraport AG*

AMC/GM to Annex II - Part- OR Subpart E
General

The aerodrome manual should be designed as such, that a review and update of the manual is not an ongoing process. It should contain information to such a detail level that an update process is limited to a yearly update as a maximum. More detailed information should be given in referenced procedures, AIP, certification papers of relevant infrastructure. The manual should provide an overview of infrastructure and procedures but not copy their details. Otherwise revision, amendment and approval process would be overloaded.

response Noted

The aerodrome manual should be reviewed and amended as necessary, or when directed by the competent authority. The aerodrome manual may refer to other controlled documents.

comment

2646

comment by: *Fraport AG*

AMC2-ADR.OR.E.005 - Aerodrome manual
General

The spacing and typing in the paragraph needs to be corrected.

response Accepted

The Agency has reviewed and amended the AMC to ensure its proper format, numbering, and headings.

comment

2647

comment by: *Fraport AG*

AMC2-ADR.OR.E.005 - Aerodrome manual Part A 0. 0.1. 0.1.3

Editorial

a list and brief description of the **various parts**, their contents, applicability and use;

Proposed Text

a list and brief description of the **various parts of the Aerodrome**

	<p>manual, their contents, applicability and use;</p> <p>Fraport AG What is meant by "various part"? The Aerodrome manual? Does this refer to the content of the manual?</p>
response	<p>Accepted</p> <p>The AMC refers to the Parts of the aerodrome manual. The text has been amended as suggested.</p>
comment	<p>2648 comment by: <i>Fraport AG</i></p> <p>AMC2-ADR.OR.E.005 - Aerodrome manual Part B 2</p> <p>General</p> <p>The information provided on the management systems should be limited to such a detail, that it is not a duplication of other manuals such as the SMS manual .</p>
response	<p>Accepted</p> <p>There is no need to duplicate this information; GM1-ADR.OR.D.005(c) states the following: 'It is not required to duplicate information in several manuals. The Safety Management Manual is considered to be a part of the aerodrome manual.'. AMC2-ADR.OR.D.005(c) - AERODROME OPERATOR SAFETY MANAGEMENT MANUAL, is also relevant to this issue.</p>
comment	<p>2649 comment by: <i>Fraport AG</i></p> <p>AMC2-ADR.OR.E.005 - Aerodrome manual Part C 4, 5 and 6</p> <p>General</p> <p>The information provided in the manual should give an outline of the particulars but not replace or duplicate the information in the AIP. Though, there should be a reference to the content of the AIP.</p>
response	<p>Noted</p> <p>The aerodrome manual should contain all the necessary information for the operation, maintenance, and management of the aerodrome, including the information mentioned in the Part C paragraphs 4.4. 4.5 and 4.6, whose originator is the aerodrome operator. The aerodrome manual may refer to other controlled documents.</p>
comment	<p>2650 comment by: <i>Fraport AG</i></p> <p>AMC2-ADR.OR.E.005 - Aerodrome manual Part D 5 and 6</p> <p>General</p> <p>The information provided in the manual should give an outline of the particulars but not replace or duplicate the information in the AIP. Though, there should be a reference</p>

	to the content of the AIP.
response	<p>Noted</p> <p>The aerodrome manual should contain all the necessary information for the operation, maintenance, and management of the aerodrome, including the information mentioned in the Part D paragraphs 5 and 6, whose originator is the aerodrome operator. The aerodrome manual may refer to other controlled documents.</p>
comment	<p>2651 comment by: <i>Fraport AG</i></p> <p>AMC2-ADR.OR.E.005 - Aerodrome manual 6. 6.6</p> <p>General</p> <p>the geographical coordinates of each threshold, appropriate taxiway centre line points and aircraft stands;</p> <p>Clarification necessary</p> <p>Fraport AG Definition of "appropriate taxiway centre line" unclear.</p>
response	<p>Accepted</p> <p>Annex 14 standard 2.5.3 and its Appendix 5 are relevant to this issue. Relevant material have also been included in Part ADR.OPS related to the requirements ADR.OPS.A.005 and DR-OPS.A.010.</p>
comment	<p>2652 comment by: <i>Fraport AG</i></p> <p>AMC2-ADR.OR.E.005 - Aerodrome manual Part E</p> <p>General</p> <p>The information provided in the manual should give an outline of the particulars but not replace or duplicate already existing down procedures and/or guidelines (i.e. vehicle traffic guidelines, Emergency plans).</p>
response	<p>Noted</p> <p>The aerodrome manual should contain all such information. However, this information does not need to be in one single document, since ADR.OR.E.005 foresees that it may be issued in separate parts. In addition, ADR.OR.E.005(b) (formerly part of ADR.OR.E.010) foresees that 'The aerodrome manual shall contain or refer to all necessary information for the safe use, operation and maintenance of the aerodrome, ..'. For example, the aerodrome emergency plan may be a separate document, which, however, must meet the relevant requirements.</p>

comment	737	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Die Möglichkeit verschiedene Dokumente mit sinnvollen Verweisen miteinander zu verknüpfen, um alle relevanten Prozesse und Inhalte zu beschreiben, muss auch für das SMS gegeben sein. Insbesondere auch wegen der notwendigen Abgrenzung zu einem "Safety Management Manual".	
response	Noted	
	This possibility already exists; AMC2-ADR.OR.D.005(c) and GM1-ADR.OR.D.005(c) make specific reference to this issue.	
comment	905 ❖	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none">• ANNEX II — Part-OR — ADR.OR.E.005 — Aerodrome manual (p56-57)• ANNEX II — Part-OR — ADR.OR.E.010 — Structure of the aerodrome manual (p57-58)• AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.E.005 — Aerodrome manual (p109)• AMC/GM to ANNEX II — Part-OR — AMC2-ADR.OR.E.005 — Aerodrome manual (p109-114)• AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.E.010 — Aerodrome manual (p114-115)• AMC/GM to ANNEX II — Part-OR — GM2-ADR.OR.E.005 — Structure of the aerodrome manual (p114-115)	
	<u>2. Justification and proposed text / comment</u>	
	This comment is linked with comment 1177 in book I.	
	• <u>ADR.OR.E.010 — Structure of the aerodrome manual</u>	
	This rule lays down the structure of the aerodrome manual. DGAC proposes to indicate that flexibility in the order of the part is possible (see proposition below).	
	ADR.OR.E.010 — Structure of the aerodrome manual	
	<i>"The aerodrome manual shall contain or refer to all necessary information for the safe use, operation and maintenance of the aerodrome, its equipment, as well as its defined obstacle limitation surfaces and other surfaces. The main structure of the aerodrome manual shall be as follows include at least the following parts (the parts may be in a different order):</i>	
	<i>(a) Part A: General;</i>	
	<i>(b) Part B: Aerodrome management, safety management system, qualification and training requirements;</i>	
	<i>(c) Part C: Particulars of the aerodrome site;</i>	
	<i>(d) Part D: Particulars of the aerodrome required to be reported to the Aeronautical Information Service; and</i>	
	<i>(e) Part E: Particulars of the operating procedures of the aerodrome, its equipment and safety measures."</i>	
	• <u>AMC1-ADR.OR.E. 005 – Aerodrome manual</u>	
	This AMC deals with the structure of the aerodrome manual, so should be attached to ADR.OR.E.010 and not to ADR.OR.E. 005.	

As written, paragraph (e) of this AMC should be in GM. It is proposed to move it to the proposed *GM1-ADR.OR.E.010 – Structure of the aerodrome manual* (see below).

Moreover, an aerodrome has not systematically an equipment manual which is more ATC's task. See DGAC's comment on equipment.

AMC1-ADR.OR.E.00510 – Structure of the aerodrome manual

"[...]

~~(e) The aerodrome manual may contain parts of, or refer to other controlled documents, such as aerodrome equipment manual, which are available at the aerodrome for use by the personnel"~~

ADR.OR.E.005 and AMC2-ADR.OR.E.005 – Aerodrome manual

* This AMC deals with the structure of the aerodrome manual, so should be attached to ADR.OR.E.010 and not to ADR.OR.E.005.

* The mentioned content of the aerodrome manual is extremely detailed and there is a strong risk that it may not be adapted to all aerodromes originations.

The AMC should instead lay down the principles for the writing of the manual and the GM should provide detailed information such as the one proposed by the current AMC2-ADR.OR.E.005.

DGAC proposes thus to mention only general principles in AMC2: see below the proposed AMC2-ADR.OR.E.010, and to put the current content of AMC2-ADR.OR.E.005 to GM named "*GM1-ADR.OR.E.010 – Structure of the aerodrome manual*" (see below).

* The current content of AMC2-ADR.OR.E.005 is not consistent with the rule it is attached to. In particular, the titles of the parts are different from ADR.OR.E.010: see below the modifications of the proposed GM1-ADR.OR.E.010 – Structure of the aerodrome manual.

* The future content of the proposed *GM1-ADR.OR.E.010 – Structure of the aerodrome manual* is to be harmonized with other comments detailed by DGAC in other comments on other subjects such as apron management services or equipment manual.

* In order to be consistent with the RFF requirements and terminology laid down in part OPS of the NPA, paragraph 4.4 of part C and paragraph 6.12 of part D of the proposed content of the manual should be use the terminology "*level of protection*" instead of "*category*".

* Paragraph 2.2.9 is related to emergency response planning which is already dealt with and even more detailed in paragraph 9 of part E of the proposed content of the manual.

Finally, as written, paragraph (c) of *ADR.OR.E.005 – Aerodrome manual* should be moved to GM, in particular because separating parts of the manual should remain just a possibility since it may be confusing.

Thus the following proposed modifications:

ADR.OR.E.005 – Aerodrome manual

~~"[...] (c) The aerodrome manual may be issued in separate parts. [...]~~

"

AMC2-ADR.OR.E.010 – Structure of the aerodrome manual

"The aerodrome should include at least the following information :

- *description of aerodrome infrastructure, services and facilities,*
- *operating procedures,*
- *management systems, including safety, quality and security management and compliance monitoring function,*
- *any restriction on aerodrome availability.*

It should identify the safety accountability for each domain or activity described."

AMC2-GM1-ADR.OR.E.00510 – Structure of the Aerodrome manual

"(a) The aerodrome manual may be issued in separate parts.

(b) The aerodrome manual may contain parts of, or refer to other controlled documents of the aerodrome operator, which are available at the aerodrome for use by the personnel.

(c) The aerodrome manual should include at least the following information:

[...]

~~B. PART B – AERODROME ADMINISTRATION MANAGEMENT, SAFETY MANAGEMENT SYSTEM, QUALIFICATION AND TRAINING REQUIREMENTS INCLUDING SAFETY, AND QUALITY AND SECURITY MANAGEMENT FOR AERONAUTICAL DATA AND AERONAUTICAL INFORMATION PROVISION ACTIVITIES~~

[...]

2.2.9 emergency response planning;

[...]

~~C. PART C – PARTICULARS OF THE AERODROME SITE~~

[...]

4.4 description of the physical characteristics of the aerodrome, elevations, visual and non-visual aids, as well as the information regarding the aerodrome reference temperature, strength of pavements, rescue and fire fighting level of protection, ground aids and main obstacles;

[...]

~~D. PART D – PARTICULARS OF THE AERODROME REQUIRED TO BE REPORTED TO THE AERONAUTICAL INFORMATION SERVICE~~

[...]

6.7 the geographical coordinates and the top elevation of significant obstacles in the approach and take-off areas, in the circling area and in the vicinity surroundings of the aerodrome;

[...]

6.12 category level of protection of rescue and fire fighting; and

[...]

~~E. PART E – PARTICULARS OF THE AERODROME OPERATING PROCEDURES AND SAFETY MEASURES OPERATING PROCEDURES OF THE AERODROME, ITS EQUIPMENT AND SAFETY MEASURES~~

[...]

9. Aerodrome emergency plan including:

9.1 dealing with emergencies at the aerodrome or in its vicinity surroundings;

[...]

28. Procedures for the protection of radar and other navigational aids, control of activities, and ground maintenance in the vicinity surroundings of these installations.

[...]"

GM1-ADR.OR.E.010 – Aerodrome manual and GM2-ADR.OR.E.005 – Structure of the aerodrome manual

GM1 deals with the aerodrome manual in general, so should be attached to OR.E.005 instead of OR.E.010.

GM2 deals with the Structure of the aerodrome manual, so should be attached to OR.E.010 instead of OR.E.005

Moreover, editorial improvements are proposed (see DGAC's general

comment on the goal and writing of guidance materials).

GM1-ADR.OR.E.010 005 – Aerodrome manual

"FORM OF THE AERODROME MANUAL

*[...] The reader of an aerodrome manual ~~should~~ **may** be given a clear statement of how safety is developed, managed and maintained on the aerodrome. [...]"*

GM2-ADR.OR.E.005 010 – Structure of the aerodrome manual

"PURPOSE AND SCOPE OF THE AERODROME MANUAL

*An efficient management structure and a systematic approach to aerodrome operation is essential. The aerodrome manual ~~should~~ **may** contain all the relevant information to describe this structure satisfactorily. It is one of the means by which all aerodrome operating staff can be informed as to their duties and responsibilities with regard to safety. It ~~should~~ **may** describe the aerodrome infrastructure, services and facilities, all operating procedures, and any restrictions on aerodrome availability.*

*Accountability for safety must start at the very top of any organisation. One of the key elements in establishing safe working practices is the 'top down' approach where all staff ~~should~~ **may** understand the safety aims of the organisation, the chain of command, and their own responsibilities and accountabilities. As safety management principles are applied, the aerodrome manual ~~should~~ **may** be expanded to describe clearly how the safety of operations is to be managed. To a reader or user of the aerodrome manual there ~~should~~ **may** never be any doubt in terms of 'safety accountability' for each domain or activity described. Each section ~~should~~ **may** define who is accountable, who is responsible, who has the authority, who has the expertise and who actually carries out the tasks described in any section.*

*The principle objective of an aerodrome manual ~~should~~ **may** be to show how management will accomplish its safety responsibilities. The manual will set out the policy and expected standards of performance and the procedures by which they will be achieved.*

*The aerodrome operator ~~should~~ **may** ensure that:*

- the responsibilities of the aerodrome operator are clearly described;*
- the tasks and activities that are to be done by the aerodrome operator or its subcontractors are listed;*
- the means and procedures in order to complete these tasks and activities are described or appended, together with the necessary details on their frequencies and operating modes.*

*Where responsibilities are attributed to other stakeholders, the aerodrome manual ~~should~~ **may** clearly identify them."*

response Partially accepted

The Agency accepts that there was a discrepancy between the AMC2 and the relevant requirement ADR.OR.E.005. To better address this, the Agency has moved the first sentence of ADR.OR.E.010 to paragraph (b) of ADR.OR.E.005, while the remaining part of ADR.OR.E.010 is now a new paragraph (m) of ADR.OR.E.005. In this way, the actual content of the requirements and the relevant AMC will be better organised.

However, the Agency considers that that the content of the aerodrome manual, which is based on the ICAO aerodrome certification manual (ICAO

Doc 9774), should remain at AMC level, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator.
Moreover, the Agency has amended the title of Part B and E of the AMC2 in the suggested direction and replaced the word 'vicinity' with the word 'surroundings'. In addition, the term 'level of protection' has been used in the AMC, while the Parts of the AMC have been reviewed and renumbered as necessary.

comment 1138 comment by: *NATS National Air Traffic Services Limited*
The GM should appear sequentially so GM1-ADR.OR.E.010 should appear after GM2-ADR.OR.E.005.

response Accepted
The relevant Guidance Material have been merged, renumbered, and linked to requirement ADR.OR.E.005.

comment 2645 ❖ comment by: *Fraport AG*
AMC/GM to Annex II - Part- OR Subpart E
General

The aerodrome manual should be designed as such, that a review and update of the manual is not an ongoing process. It should contain information to such a detail level that an update process is limited to a yearly update as a maximum. More detailed information should be given in referenced procedures, AIP, certification papers of relevant infrastructure. The manual should provide an overview of infrastructure and procedures but not copy their details. Otherwise revision, amendment and approval process would be overloaded.

response Noted
The aerodrome manual should be reviewed and amended as necessary, or when directed by the competent authority. The aerodrome manual may refer to other controlled documents.

comment 2653 comment by: *Fraport AG*
GM1-ADR.OR.E.010 — Aerodrome manual
Editorial

The aerodrome manual is a key document both for the aerodrome operator and the competent authority. The manual is the source document describing how the aerodrome infrastructure, facilities and operational procedures will operate safely.

Proposed Text
The manual gives an overview, describing how the aerodrome infrastructure, facilities and operational procedures will operate safely.

	<p>Fraport AG The information within this document has to be significant different to the CB, otherwise the key effect would get lost and the Aerodrome manual more or less that what it is until now: "The manual should provide an overview of infrastructure and procedures but not copy their details."</p>
response	<p>Noted</p> <p>The Agency considers that, indeed, the aerodrome manual is the key safety assurance document to assess the initial and continued competence of the aerodrome operator.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX II – Part -OR – SUBPART E – AERODROME MANUAL (ADR.OR.E) – GM2-ADR.OR.E.005 – Structure of the aerodrome manual – PURPOSE AND SCOPE OF THE AERODROME MANUAL</p>	<p>p. 115-116</p>
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comment	<p>187 comment by: <i>SWISS AERODROMES ASSOCIATION</i></p> <p>The last sentence of page 115 refers to subcontractors. Main contractors and other actors like State agencies should be mentioned as well.</p>
response	<p>Noted</p>

comment	<p>905 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• ANNEX II – Part-OR – ADR.OR.E.005 – Aerodrome manual (p56-57)• ANNEX II – Part-OR – ADR.OR.E.010 – Structure of the aerodrome manual (p57-58)• AMC/GM to ANNEX II – Part-OR – AMC1-ADR.OR.E.005 – Aerodrome manual (p109)• AMC/GM to ANNEX II – Part-OR – AMC2-ADR.OR.E.005 – Aerodrome manual (p109-114)• AMC/GM to ANNEX II – Part-OR – GM1-ADR.OR.E.010 – Aerodrome manual (p114-115)• AMC/GM to ANNEX II – Part-OR – GM2-ADR.OR.E.005 – Structure of the aerodrome manual (p114-115) <p><u>2. Justification and proposed text / comment</u></p> <p>This comment is linked with comment 1177 in book I.</p> <ul style="list-style-type: none">• <u>ADR.OR.E.010 – Structure of the aerodrome manual</u> <p>This rule lays down the structure of the aerodrome manual. DGAC proposes to indicate that flexibility in the order of the part is possible (see proposition below).</p> <p>ADR.OR.E.010 – Structure of the aerodrome manual</p> <p><i>"The aerodrome manual shall contain or refer to all necessary information for the safe use, operation and maintenance of the aerodrome, its equipment, as well as its defined obstacle limitation surfaces and other</i></p>
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surfaces. The main structure of the aerodrome manual shall ~~be as follows~~ include at least the following parts (the parts may be in a different order):

- (a) Part A: General;*
- (b) Part B: Aerodrome management, safety management system, qualification and training requirements;*
- (c) Part C: Particulars of the aerodrome site;*
- (d) Part D: Particulars of the aerodrome required to be reported to the Aeronautical Information Service; and*
- (e) Part E: Particulars of the operating procedures of the aerodrome, its equipment and safety measures."*

· AMC1-ADR.OR.E. 005 – Aerodrome manual

This AMC deals with the structure of the aerodrome manual, so should be attached to ADR.OR.E.010 and not to ADR.OR.E. 005.

As written, paragraph (e) of this AMC should be in GM. It is proposed to move it to the proposed *GM1-ADR.OR.E.010 – Structure of the aerodrome manual* (see below).

Moreover, an aerodrome has not systematically an equipment manual which is more ATC's task. See DGAC's comment on equipment.

AMC1-ADR.OR.E.00510 – Structure of the aAerodrome manual

"[...]"

~~*(e) The aerodrome manual may contain parts of, or refer to other controlled documents, such as aerodrome equipment manual, which are available at the aerodrome for use by the personnel"*~~

· ADR.OR.E.005 and AMC2-ADR.OR.E.005 – Aerodrome manual

* This AMC deals with the structure of the aerodrome manual, so should be attached to ADR.OR.E.010 and not to ADR.OR.E.005.

* The mentioned content of the aerodrome manual is extremely detailed and there is a strong risk that it may not be adapted to all aerodromes originations.

The AMC should instead lay down the principles for the writing of the manual and the GM should provide detailed information such as the one proposed by the current AMC2-ADR.OR.E.005.

DGAC proposes thus to mention only general principles in AMC2: see below the proposed AMC2-ADR.OR.E.010, and to put the current content of AMC2-ADR.OR.E.005 to GM named "*GM1-ADR.OR.E.010 – Structure of the aerodrome manual*" (see below).

* The current content of AMC2-ADR.OR.E.005 is not consistent with the rule it is attached to. In particular, the titles of the parts are different from ADR.OR.E.010: see below the modifications of the proposed GM1-ADR.OR.E.010 – Structure of the aerodrome manual.

* The future content of the proposed *GM1-ADR.OR.E.010 – Structure of the aerodrome manual* is to be harmonized with other comments detailed by DGAC in other comments on other subjects such as apron management services or equipment manual.

* In order to be consistent with the RFF requirements and terminology laid down in part OPS of the NPA, paragraph 4.4 of part C and paragraph 6.12 of part D of the proposed content of the manual should be use the terminology "*level of protection*" instead of "*category*".

* Paragraph 2.2.9 is related to emergency response planning which is already dealt with and even more detailed in paragraph 9 of part E of the proposed content of the manual.

Finally, as written, paragraph (c) of *ADR.OR.E.005 – Aerodrome manual* should be moved to GM, in particular because separating parts of the manual should remain just a possibility since it may be confusing.

Thus the following proposed modifications:

ADR.OR.E.005 – Aerodrome manual

"[...] ~~(c) The aerodrome manual may be issued in separate parts.~~ [...]"

AMC2-ADR.OR.E.010 – Structure of the aerodrome manual

"The aerodrome should include at least the following information :

- description of aerodrome infrastructure, services and facilities,
- operating procedures,
- management systems, including safety, quality and security management and compliance monitoring function,
- any restriction on aerodrome availability.

It should identify the safety accountability for each domain or activity described."

AMC2-GM1-ADR.OR.E.00510 – Structure of the aerodrome manual

"(a) The aerodrome manual may be issued in separate parts.

(b) The aerodrome manual may contain parts of, or refer to other controlled documents of the aerodrome operator, which are available at the aerodrome for use by the personnel.

(c) The aerodrome manual should include at least the following information:

"[...]"

~~B. PART B – AERODROME ADMINISTRATION MANAGEMENT, SAFETY MANAGEMENT SYSTEM, QUALIFICATION AND TRAINING REQUIREMENTS INCLUDING SAFETY, AND QUALITY AND SECURITY MANAGEMENT FOR AERONAUTICAL DATA AND AERONAUTICAL INFORMATION PROVISION ACTIVITIES~~

"[...]"

2.2.9 emergency response planning;

"[...]"

~~C. PART C – PARTICULARS OF THE AERODROME SITE~~

"[...]"

4.4 description of the physical characteristics of the aerodrome, elevations, visual and non-visual aids, as well as the information regarding the aerodrome reference temperature, strength of pavements, rescue and fire fighting level of protection, ground aids and main obstacles;

"[...]"

~~D. PART D – PARTICULARS OF THE AERODROME REQUIRED TO BE REPORTED TO THE AERONAUTICAL INFORMATION SERVICE~~

"[...]"

6.7 the geographical coordinates and the top elevation of significant obstacles in the approach and take-off areas, in the circling area and in the vicinity surroundings of the aerodrome;

"[...]"

6.12 category level of protection of rescue and fire fighting; and

"[...]"

~~E. PART E – PARTICULARS OF THE AERODROME OPERATING PROCEDURES AND SAFETY MEASURES OPERATING PROCEDURES OF THE AERODROME, ITS EQUIPMENT AND SAFETY MEASURES~~

"[...]"

9. Aerodrome emergency plan including:

9.1 dealing with emergencies at the aerodrome or in its vicinity

surroundings;

[...]

28. Procedures for the protection of radar and other navigational aids, control of activities, and ground maintenance in the vicinity surroundings of these installations.

[...]"

· GM1-ADR.OR.E.010 — Aerodrome manual and GM2-ADR.OR.E.005 — Structure of the aerodrome manual

GM1 deals with the aerodrome manual in general, so should be attached to OR.E.005 instead of OR.E.010.

GM2 deals with the Structure of the aerodrome manual, so should be attached to OR.E.010 instead of OR.E.005

Moreover, editorial improvements are proposed (see DGAC's general comment on the goal and writing of guidance materials).

GM1-ADR.OR.E.010 005 — Aerodrome manual

"FORM OF THE AERODROME MANUAL

[...] *The reader of an aerodrome manual ~~should~~ may be given a clear statement of how safety is developed, managed and maintained on the aerodrome. [...]"*

GM2-ADR.OR.E.005 010 — Structure of the aerodrome manual

"PURPOSE AND SCOPE OF THE AERODROME MANUAL

An efficient management structure and a systematic approach to aerodrome operation is essential. The aerodrome manual ~~should~~ may contain all the relevant information to describe this structure satisfactorily. It is one of the means by which all aerodrome operating staff can be informed as to their duties and responsibilities with regard to safety. It ~~should~~ may describe the aerodrome infrastructure, services and facilities, all operating procedures, and any restrictions on aerodrome availability.

Accountability for safety must start at the very top of any organisation. One of the key elements in establishing safe working practices is the 'top down' approach where all staff ~~should~~ may understand the safety aims of the organisation, the chain of command, and their own responsibilities and accountabilities. As safety management principles are applied, the aerodrome manual ~~should~~ may be expanded to describe clearly how the safety of operations is to be managed. To a reader or user of the aerodrome manual there ~~should~~ may never be any doubt in terms of 'safety accountability' for each domain or activity described. Each section ~~should~~ may define who is accountable, who is responsible, who has the authority, who has the expertise and who actually carries out the tasks described in any section.

The principle objective of an aerodrome manual ~~should~~ may be to show how management will accomplish its safety responsibilities. The manual will set out the policy and expected standards of performance and the procedures by which they will be achieved.

The aerodrome operator ~~should~~ may ensure that:

- *the responsibilities of the aerodrome operator are clearly described;*
- *the tasks and activities that are to be done by the aerodrome operator or its subcontractors are listed;*
- *the means and procedures in order to complete these tasks and activities are described or appended, together with the necessary*

	<p><i>details on their frequencies and operating modes.</i></p> <p><i>Where responsibilities are attributed to other stakeholders, the aerodrome manual should may clearly identify them."</i></p>
response	<p>Partially accepted</p> <p>The Agency accepts that there was a discrepancy between the AMC2 and the relevant requirement ADR.OR.E.005. To better address this, the Agency has moved the first sentence of ADR.OR.E.010 to paragraph (b) of ADR.OR.E.005, while the remaining part of ADR.OR.E.010 is now a new paragraph (m) of ADR.OR.E.005. In this way, the actual content of the requirements and the relevant AMC will be better organised.</p> <p>However, the Agency considers that that the content of the aerodrome manual, which is based on the ICAO aerodrome certification manual (ICAO Doc 9774), should remain at AMC level, since it is the key document for the operation of the aerodrome and for evaluating the initial and continuing competence of the aerodrome operator.</p> <p>Moreover, the Agency has amended the title of Part B and E of the AMC2 in the suggested direction and replace the word 'vicinity' with the word 'surroundings'. In addition, the term 'level of protection' has been used in the AMC, while the Parts of the AMC have been reviewed and renumbered as necessary.</p>
comment	<p>1140 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>The GM should appear sequentially so GM1-ADR.OR.E.010 should appear after GM2-ADR.OR.E.005.</p> <p>As there is no GM1-ADR.OR.E.005 then GM2 should be GM1.</p>
response	<p>Accepted</p> <p>The relevant Guidance Material have been merged, renumbered, and linked to requirement ADR.OR.E.005.</p>
comment	<p>2645 ❖ comment by: <i>Fraport AG</i></p> <p>AMC/GM to Annex II - Part- OR Subpart E General</p> <p>The aerodrome manual should be designed as such, that a review and update of the manual is not an ongoing process. It should contain information to such a detail level that an update process is limited to a yearly update as a maximum. More detailed information should be given in referenced procedures, AIP, certification papers of relevant infrastructure. The manual should provide an overview of infrastructure and procedures but not copy their details. Otherwise revision, amendment and approval process would be overloaded.</p>
response	<p>Noted</p>

The aerodrome manual should be reviewed and amended as necessary, or when directed by the competent authority. The aerodrome manual may refer to other controlled documents.

comment	2654	comment by: <i>Fraport AG</i>
	GM2-ADR.OR.E.005 — Structure of the aerodrome manual	
	General	
	The aerodrome manual is not an openly accessible document. Its whole content is known to the competent authority and the aerodrome operator exclusively. Third Parties only know the extracts relevant for their service provision in forms.	
response	Noted	
	The relevant requirement foresees that the relevant parts of the manual have to be distributed to all other organisations concerned.	

<p>NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part -OPS — SUBPART A — AERODROME DATA (ADR.OPS.A) — AMC-ADR-OPS.A.005 — Aeronautical Data</p>	p. 117
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comment	22	comment by: <i>ACI EUROPE - Airports Council International</i>
	define what is meant by "Area 2" and "Area 3" and also check consistency with ADQ Regulation EC 73/2010	
	Justification: seems to be based on ICAO but please specify.	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	

comment	137	comment by: <i>CAA-NL</i>
	We suggest to make a reference to ICAO for the meaning of area 2 and area 3.	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	

comment	167	comment by: <i>Swedavia AB - Swedish airports (currently 11 airports)</i>
	(b), (c) Define the meaning by "Area 2" and "Area 3" and also check consistency with ADQ Regulation EC 73/2010.	
response	Accepted	

Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)

comment

229

comment by: *KLM*

Change

The ACN/PCN method must be part of the Regulation rather than being positioned in the AMC/GM part of the document

Clarification:

The Pavement strength must be expressed in the Pavement Classification number (PCN) according to the extensively discussed and adopted Aircraft Classification Number / Pavement Classification Number method in the early 80ties by ICAO where the system replaced the Load Classification System.

This to provide the necessary standardization across the globe for assessing the impact of aircraft loading on pavements, which is a crucial factor for airlines in the planning phase of aircraft operations.

It would be a mistake and will provide a wrong message when European Regulations on Aerodromes will allow airport operators to classify their pavement strengths by means of an alternative means.

response

Noted

comment

300

comment by: *CAA Austria - Ministry of Transport*

Check consistency with ADQ Regulation EC 73/2010

response

Accepted

comment

560

comment by: *Vienna International Airport*

Check consistency with ADQ Regulation EC 73/2010

response

Accepted

comment

711

comment by: *ADP : Aeroports de Paris*

Référence: AMC-ADR.OPS.A.005	Aeronautical Data
Proposition/commentaire	Il faudrait bien définir les aires 2 et 3 mentionnées aux (b) et (c).
Justification	
Traduction de courtoisie	The areas 2 and 3 mentioned in (b) and (c) should be well defined.

	Aeronautical	Data
	Traduction de courtoisie	
	The areas 2 and 3 mentioned in (b) and (c) should be well defined.	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	
comment	1470	comment by: <i>Flughafen Graz Betriebs GmbH</i>
	Check consistency with ADQ Regulation EC 73/2010	
response	Accepted	
comment	1519	comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i>
	Check consistency with ADQ Regulation EC 73/2010	
response	Accepted	
comment	1589	comment by: <i>Geneva International Airport (ROMIG)</i>
	There is a problem with the format of the heading.	
	Define what is meant by "Area 2" and "Area 3" and also check consistency with ADQ Regulation EC 73/2010	
	Seems to be based on ICAO, but specify where this comes from.	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	
comment	1617	comment by: <i>Assaeroporti - Associazione Italiana Gestori Aeroporti</i>
	(b) and (c): we suggest to define what is meant by "Area 2" and "Area 3" and also check consistency with ADQ Regulation EC 73/2010. It seems to be based on ICAO Annex 15, but a specification is required.	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	
comment	1633	comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i>
	check consistency with ADQ Regulation EC 73/2010	
response	Accepted	

comment	1757	comment by: <i>Aéroport de Marseille - MRS/LFML</i>
	The areas 2 and 3 mentioned in (b) and (c) should be well defined.	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	
comment	1761	comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i>
	Define what is meant by "Area 2" and "Area 3".	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	
comment	1807	comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i>
	Attachment #147	
	UAF	NPA 2011-20 (B.II) AMC-ADR.OPS.A.005
	Référence:	AMC-ADR.OPS.A.005
	Aeronautical	Data
	Traduction	de courtoisie
	The areas 2 and 3 mentioned in (b) and (c) should be well defined.	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	
comment	1905	comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i>
	The areas 2 and 3 mentioned in (b) and (c) should be well defined.	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	
comment	1971	comment by: <i>Turin Airport - TRN/LIMF</i>
	(b) and (c): we suggest to define what is meant by "Area 2" and "Area 3" and also check consistency with ADQ Regulation EC 73/2010. It seems to be based on ICAO Annex 15, but a specification is required.	
response	Accepted	
	Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	
comment	1993	comment by: <i>Munich Airport International</i>

	(b)(c) define what is meant by "Area 2" and "Area 3" and also check consistency with ADQ Regulation EC 73/2010 Justification: seems to be based on ICAO, but specify
response	Accepted Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)
comment	2033 comment by: <i>Shannon Airport</i> (b) Definition / clarification should be provided as to what is concerned with respect to Areas 2/3 and where this is referenced.
response	Accepted Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)
comment	2094 comment by: <i>IATA</i> AMC/GM to Annex III – Part-OPS SUBPART A – AERODROME DATA (ADR.OPS.A) Change The ACN/PCN method must be part of the Regulation rather than being positioned in the AMC/GM part of the document Clarification: The Pavement strength must be expressed in the Pavement Classification number (PCN) according to the extensively discussed and adopted Aircraft Classification Number / Pavement Classification Number method in the early 80ties by ICAO where the system replaced the Load Classification System. This to provide the necessary standardization across the globe for assessing the impact of aircraft loading on pavements, which is a crucial factor for airlines in the planning phase of aircraft operations. It would be a mistake and will provide a wrong message when European Regulations on Aerodromes will allow airport operators to classify their pavement strengths by means of an alternative means.
response	Noted
comment	2189 comment by: <i>Flughafen Klagenfurt</i> Check consistency with ADQ Regulation EC 73/2010
response	Accepted

comment 2273 comment by: *Airport Nuremberg - NUE/EDDN*
A definition or further specification on the terms "Area 2" and "Area 3" would be helpful.

response Accepted
Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)

comment 2345 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC-ADR.OPS.A.005	Aeronautical Data
Proposition/commentaire	Il faudrait bien définir les aires 2 et 3 mentionnées aux (b) et (c).
Justification	
Traduction de courtoisie	The areas 2 and 3 mentioned in (b) and (c) should be well defined.

response Accepted
Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)

comment 2465 comment by: *DAA Cork Airport*
(b) - Definition / clarification should be provided as to what is concerned with respect to Areas 2/3 and where this is referenced.

response Accepted
Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)

comment 2558 comment by: *ADV -German Airports Association*
AMC.ADR.OPS.A.005 (b) (c)
define what is meant by "Area 2" and "Area 3" and also check consistency with ADQ Regulation EC 73/2010
Justification
seems to be based on ICAO, but specify

response Accepted
Explanation for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)

comment 2655 comment by: *Fraport AG*
AMC-ADR-OPS.A.005 — Aeronautical Data (b) and (c)

	<p>Editorial/ Question</p> <p>(b) The aerodrome operator should provide obstacles and terrain data within the boundary of the aerodrome (Area 3) and in the Terminal Control Area (Area 2) within the aerodrome boundary; (c) The aerodrome operator should establish arrangements with the ANS providers and the competent authority for the provision of obstacles and terrain data in the Terminal Control Area (Area 2) outside of the aerodrome boundary;</p> <p>Delete both paragraphs</p> <p>Fraport AG Paragraph (b) and (c) are already addressed in (EU) No 73/2010, Annex I, Part B. To avoid duplication in regulation, this both should be deleted. Definition of "Areas" are missing</p>
response	Noted

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part -OPS – SUBPART A – AERODROME DATA (ADR.OPS.A) – GM-ADR-OPS.A.005 – Aeronautical data

p. 117-126

comment	<p>23 comment by: ACI EUROPE - Airports Council International</p> <p>(a) (6) define slope</p>
response	<p>Accepted</p> <p>The term 'longitudinal' has been added to define the slope.</p>
comment	<p>24 comment by: ACI EUROPE - Airports Council International</p> <p>(a) (5) & (b) 1) delete "to the nearest meter or foot"</p>
response	<p>Not accepted</p> <p>The requirement comes from ICAO Annex 14 2.5.1.(a) & (b) respectively.</p>
comment	<p>25 comment by: ACI EUROPE - Airports Council International</p> <p>"Snow, slush, ice"</p> <p>be aware and cross check with ICAO state letter since this will probably change - to ensure consistency!</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>62 comment by: CAA Norway</p>

response	<p>We suggest to delete AT-VASIS in GM-ADR-OPS.A.005 on page 125. It is not used any longer</p> <p>Accepted</p> <p>AT-VASIS has been deleted.</p>
comment	<p>114 comment by: <i>Belfast International Airport - BFS/EGAA</i></p> <p>We feel that the addition of the extra surface condition types enhances the reporting. (Wet compacted snow, wet ice and chemically treated)</p>
response	<p>Noted</p> <p>The Agency kept the current ICAO Annex 14 provisions on reporting the type of runway contaminants.</p>
comment	<p>138 comment by: <i>CAA-NL</i></p> <p>Under water on the runway (b) we suggest to change (1) wet – into 'the surface of the runway, more than 25% of the total runway surface area, is soaked but there is no standing water'.</p> <p>Under snow, slush or ice on the runway (g) we suggest to delete (5) 'in cases where a spot measuring friction device is used as part of the total assessment of the estimated surface friction, each third of the runway should have three tests carried out on it, where achievable. If an aerodrome operator wants to use the spot measuring friction device it should be suggested as an alternative means of compliance by the aerodrome operator, because a spot measuring friction device should not be used in snow or slush as it can give misleading values.</p>
response	<p>Accepted</p> <p>Concerning the first comment, the Agency decided to keep the terms used in the current edition of ICAO Annex 14, 2.9.4</p> <p>The proposal to delete (g) (5) under snow, slush, or ice on runway, is agreed.</p>
comment	<p>168 comment by: <i>Swedavia AB - Swedish airports (currently 11 airports)</i></p> <p>Under AERODROME REFERENCE TEMPERATURE (b) "Over a period of ? years" Probably a misprint. (According to today's rules from the CAA it states 5 years).</p> <p>SNOW SLUSH OR ICE ON A RUNWAY. Para (f) code 9 is missing. The alternative "unreliable" would be desirable to have as well.</p> <p>On page 123 under Snow, slush or ice on a runway (b), suggest to separate the surface condition from actions. Para (11) Chemically treated and (12) Sanded describes actions taken, not surface condition. Ref Doc 9137 AN/898, Airport Services Manual - Part 2, 6-5.</p>

	<p>Furthermore, there is no alternative for reporting a clean and dry runway. Suggest to add NIL as a reporting code for this condition.</p> <p>There is no alternative for reporting water on runway, would be desirable to be able to report this condition as well under other wintercontaminations and not divided into two parts.</p> <p>On page 125 under (h), when assessing the depth of approximately 2cm for dry snow, 1cm for wet snow and 0.3mm for slush. It would be desirable to report values with an accuracy of up to +2mm regardless of the type of contamination.</p>
response	<p><i>Noted</i></p> <p>For Aerodrome Reference Temperature, the period has been defined to five years as proposed</p> <p>Concerning the reported friction values and the estimated braking action information, they are in accordance with ICAO Annex 14.</p> <p>The provisions under 'Snow, slush, or ice on a runway' has been changed to the current text in ICAO Annex 14, and the proposals contained in ICAO SL 41-2011 haven't been taken into account.</p> <p>Reporting of runway conditions when water is on the runway, has been also changed to the current text in ICAO Annex 14</p> <p>Concerning the last comment, these figures are coming from ICAO Annex 14, 2.9.11</p>
comment	<p>259 comment by: CAA Norway</p> <p>Check GM- ADR-OPS.A.005 — (g) on page 119. Even though copied from Annex 14 - taxi holding position is incorrect name, this position is: "Runway holding position". If the intention is to refer to holding position other places on taxiways the correct name is: "Intermediate holding position".</p> <p>We suggest rewording from the comma after "aprons": "...including runway holding positions, intermediate holding positions and stopbars ..."</p>
response	<p>Accepted</p> <p>The comment is agreed and the text is revised accordingly.</p>
comment	<p>260 comment by: CAA Norway</p> <p>Please provide GM on possible appropriate taxiway center line points in GM- ADR-OPS.A.005 (k)(2) on page 119.</p>
response	<p>Accepted</p> <p>New GM2 - ADR.OPS.A.005 (a) provides surveying requirements for runway thresholds, taxiways, and aircraft stands.</p>

comment	261	comment by: CAA Norway
	We suggest to take out AIS in GM- ADR-OPS.A.005 (a) on page 120 and mandate reporting to the ANS only. AIS is included in the ANS, a subheading to ANS.	
response	Accepted	
	The term is changed from ANS to Air Traffic Services, and the provision to report to the AIS has been retained	
comment	262	comment by: CAA Norway
	GM- ADR-OPS.A.005 on page 120: Please provide GM on managing ACN higher than PCN, ref. A14 2.6.7.	
response	Accepted	
	GM2 - ADR.OPS.C.010 (b) (1) provides guidance on overload operations.	
comment	263	comment by: CAA Norway
	We suggest to change "ATC phraseologies" to "RT phraseology" in GM-ADR-OPS.A.005 on page 124. Not all aerodromes in the scope provide ATC. Some provide AFIS.	
response	Accepted	
	'ATC phraseologies' is replaced by 'RTF phraseologies'.	
comment	301	comment by: CAA Austria - Ministry of Transport
	a)(6) Define the term slope Snow slush & ice . Cross check with ICAO State Letter 41 since this wording will probably change. Consistency with ICAO.	
response	Accepted	
	(a) (6) has been defined as 'longitudinal'. For the second comment, the Agency decided not to follow ICAO SL 41-2011 proposals since they haven't been finalised yet.	
comment	352	comment by: Avinor
	AMC.ADR.OPS.A.005 (b) c). Define what is meant by "Area 2" and "Area 3" and also check consistency with ADQ Regulation EC 73/2010.	
response	Accepted	
	Definitions for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a)	
comment	353	comment by: Avinor

response	<p>GM.ADR.OPS.A.005 (a) (6). The word "slope" should be defined. It seems to be based on ICAO, but should be specified.</p> <p><i>Accepted</i></p> <p>(a) (6) has been defined as 'longitudinal'.</p>
comment	<p>354 comment by: <i>Avinor</i></p> <p>GM.ADR.OPS.A.005 (a) (5) & (b) (1). Delete "to the nearest meter or foot".</p>
response	<p>Not accepted</p> <p>The provisions are coming from ICAO Annex 14, 2.5.1 (a) & (b)</p>
comment	<p>355 comment by: <i>Avinor</i></p> <p>"Snow slush & ice" - be aware and cross check with ICAO state letter since this will probably change</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>442 comment by: <i>Estonian CAA</i></p> <p>Check GM- ADR-OPS.A.005 — (g) on page 119. Even though copied from Annex 14 - taxi holding position is incorrect name, this position is: "Runway holding position". If the intention is to refer to holding position other places on taxiways the correct name is: "Intermediate holding position".</p> <p>We suggest rewording from the comma after ""aprons"": "...including runway holding positions, intermediate holding positions and stopbars ..."</p>
response	<p>Accepted</p> <p>The comment is agreed and text is revised accordingly.</p>
comment	<p>443 comment by: <i>Estonian CAA</i></p> <p>Please provide GM on possible appropriate taxiway center line points in GM- ADR-OPS.A.005 (k)(2) on page 119.</p>
response	<p>Accepted</p> <p>New GM2 - ADR.OPS.A.005 (a) provides surveying requirements for runway thresholds, taxiways, and aircraft stands.</p>
comment	<p>444 comment by: <i>Estonian CAA</i></p> <p>We suggest to take out AIS in GM- ADR-OPS.A.005 (a) on page 120 and mandate reporting to the ANS only. AIS is included in the ANS, a</p>

	subheading to ANS.
response	Accepted The term is changed from 'ANS' to 'Air Traffic Services' and the provision to report to the AIS has been retained.
comment	445 comment by: <i>Estonian CAA</i> GM- ADR-OPS.A.005 on page 120: Please provide GM on managing ACN higher than PCN, ref. A14 2.6.7.
response	Accepted GM2 - ADR.OPS.C.010 (b) (1) provides guidance on overload operations.
comment	447 comment by: <i>Estonian CAA</i> We suggest to change "ATC phraseologies" to "RT phraseology" in GM-ADR-OPS.A.005 on page 124. Not all aerodromes in the scope provide ATC. Some provide AFIS.
response	Accepted 'ATC phraseologies' is replaced by 'RTF phraseologies'.
comment	449 comment by: <i>Estonian CAA</i> We suggest to take out all information on AT-VASIS in GM- ADR-OPS.A.005 (b). It is not used any longer.
response	<i>Accepted</i> AT-VASIS has been deleted.
comment	493 comment by: <i>Icelandic Civil Aviation Administration</i> Check GM- ADR-OPS.A.005 — (g) on page 119. Even though copied from Annex 14 - taxi holding position is incorrect name, this position is: "Runway holding position". If the intention is to refer to holding position other places on taxiways the correct name is: "Intermediate holding position". We suggest rewording from the comma after "aprons": "...including runway holding positions, intermediate holding positions and stopbars ..."
response	Accepted The comment is agreed and text is revised accordingly.
comment	494 comment by: <i>Icelandic Civil Aviation Administration</i> Please provide GM on possible appropriate taxiway center line points in

response	<p>GM- ADR-OPS.A.005 (k)(2) on page 119.</p> <p>Accepted</p> <p>New GM2 – ADR.OPS.A.005 (a) provides surveying requirements for runway thresholds, taxiways, and aircraft stands.</p>
comment	<p>495 <i>comment by: Icelandic Civil Aviation Administration</i></p> <p>We suggest to take out AIS in GM- ADR-OPS.A.005 (a) on page 120 and mandate reporting to the ANS only. AIS is included in the ANS, a subheading to ANS.</p>
response	<p>Accepted</p> <p>The term is changed from 'ANS' to 'Air Traffic Services' and the provision to report to the AIS has been retained.</p>
comment	<p>496 <i>comment by: Icelandic Civil Aviation Administration</i></p> <p>GM- ADR-OPS.A.005 on page 120: Please provide GM on managing ACN higher than PCN, ref. A14 2.6.7.</p>
response	<p>Accepted</p> <p>GM2 - ADR.OPS.C.010 (b) (1) provides guidance on overload operations</p>
comment	<p>497 <i>comment by: Icelandic Civil Aviation Administration</i></p> <p>We suggest to change 'ATC phraseologies' to 'RT phraseology' in GM- ADR-OPS.A.005 on page 124.</p>
response	<p>Accepted</p> <p>'ATC phraseologies' is replaced with 'RTF phraseologies'.</p>
comment	<p>498 <i>comment by: Icelandic Civil Aviation Administration</i></p> <p>We suggest to take out all information on AT-VASIS in GM- ADR-OPS.A.005 (b). It is not used any longer.</p>
response	<p>Accepted</p> <p>AT-VASIS has been deleted.</p>
comment	<p>561 <i>comment by: Vienna International Airport</i></p> <p>Snow slush & ice Cross check with ICAO State Letter 41 since this wording will probably change. Consistency with ICAO is necessary .</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>

comment	667	comment by: <i>BAA Glasgow</i>
	RESCUE AND FIRE-FIGHTING (a) Consider changing to -: Information concerning the level of protection provided for aircraft rescue and fire-fighting purposes during the hours of operation must be made available;	
response	Accepted The text is revised accordingly.	
comment	840	comment by: <i>Finnish Transport Safety Agency</i>
	Check GM- ADR-OPS.A.005 — (g) on page 119. Even though copied from Annex 14 - taxi holding position is incorrect name, this position is: "Runway holding position". If the intention is to refer to holding position other places on taxiways the correct name is: "Intermediate holding position". We suggest rewording from the comma after "aprons": "...including runway holding positions, intermediate holding positions and stopbars ..."	
response	Accepted The comment is agreed and text is revised accordingly.	
comment	841	comment by: <i>Finnish Transport Safety Agency</i>
	Please provide GM on possible appropriate taxiway center line points in GM- ADR-OPS.A.005 (k)(2) on page 119.	
response	Accepted New GM2 - ADR.OPS.A.005 (a) provides surveying requirements for runway thresholds, taxiways and aircraft stands	
comment	842	comment by: <i>Finnish Transport Safety Agency</i>
	We suggest to take out AIS in GM- ADR-OPS.A.005 (a) on page 120 and mandate reporting to the ANS only. AIS is included in the ANS, a subheading to ANS.	
response	Accepted The term is changed from 'ANS' to 'Air Traffic Services' and the provision to report to the AIS has been retained.	
comment	843	comment by: <i>Finnish Transport Safety Agency</i>
	GM- ADR-OPS.A.005 on page 120: Please provide GM on managing ACN higher than PCN, ref. A14 2.6.7.	
response	Accepted GM2 - ADR.OPS.C.010 (b) (1) provides guidance on overload operations.	

comment	844	comment by: <i>Finnish Transport Safety Agency</i>
	We suggest to change "ATC phrasologies" to "RT phrasiology" in GM-ADR-OPS.A.005 on page 124. Not all aerodromes in the scope provide ATC. Some provide AFIS.	
response	Accepted 'ATC phraseologies' is replaced with 'RTF phraseologies'.	
comment	845	comment by: <i>Finnish Transport Safety Agency</i>
	We suggest to take out all information on AT-VASIS in GM-ADR-OPS.A.005 (b). It is not used any longer.	
response	Accepted AT-VASIS has been deleted.	
comment	901	comment by: <i>Cologne/Bonn Airport</i>
	(a) (b): define slope	
response	Accepted (a) (6) has been defined as 'longitudinal'.	
comment	903	comment by: <i>Cologne/Bonn Airport</i>
	(a)(5) and (b)(1): delete " to the nearest meter or foot"	
response	Not accepted Comments not agreed. The provisions are coming from ICAO Annex 14, 2.5.1 (a) & (b).	
comment	1041	comment by: <i>Finavia</i>
	Title: CONDITION OF THE MOVEMENT AREA AND RELATED FACILITIES. (6) "anti-icing or de-icing liquid chemicals or other contaminants on a runway, a taxiway" to be formulated: "anti-icing or de-icing liquid chemicals or other contaminants on a runway;"	
	Comment 1) There is no operational need to report the usage on chemicals on taxiways and apron.	
	Comment 2) (d) Runway surface friction measurements are used to conduct runway condition assessment. Runway surface friction measurements made on a runway that is contaminated by slush, wet snow or wet ice should not be reported;	
	The following Finnish approach should be recognized. It has the approval of major Finnish airlines: Finavia only reports the friction level as measured friction coefficients when	

there are no rapid and significant changes taking place in the runway conditions, when measuring equipment can be used, and the layer depth of deposits on the runway does not prevent the use of measuring equipment.

When significant changes are expected to take place in the runway friction levels after the inspection, before aircraft are operating on it, the publication of previously measured friction coefficient values would give misleading information regarding the prevailing level of friction. Therefore, the prevailing level of friction under rapidly changing conditions is reported as an estimated braking action. These values are based on friction measurements taken during runway inspection (if measuring equipment is available) and results derived from them, as well as on an estimate of the impact of weather on the rate at which the level of friction will deteriorate.

The rapidly changing conditions are deemed to end and the reporting of measured friction coefficients is resumed when it is judged that rapid and significant changes in the runway's level of surface friction are no longer taking place.

The prevailing level of friction may only be estimated by persons specifically trained and approved for the task.

Comment 3)

(g)(3) Assessments are made along two lines parallel to the runway, i.e. along a line on each side of the centerline approximately 3 m, or that distance from the centerline at which most operations take place;"

The basic measurement should be made along the runway 5-10 M on either side of the runway centerline, not 3 M from the centerline. The main issue is to measure friction noticing the palce of main gear on the runway.

response

Noted

Cocerning the reporting of contaminants, the Agency decided to change the proposed text to the current text in ICAO Annex 14.

ICAO doesn't have any reference table for reporting braking action information on contaminated surfaces, other than those covered by compacted snow or ice. The Agency is currently working on the friction coefficient measurements on contaminated surfaces.

The distance from the runway centreline for friction measurements is according to ICAO Annex 14. However, the proposed AMC allows the aerodrome operator to perform measurements at different distances according to the operations taking place on the runway.

comment

1078

comment by: *Brussels Airport - BRU/EBBR*

GM-ADR-OPS.A.005

The text under STRENGTH OF PAVEMENTS (b)(3) "Maximum allowable tire pressure category" is not lined up with Annex 14 standard 2.6.6 c).

What's the reason for this change in text ?

I suggest to stick to the Annex 14 text.

response Accepted
Text has been changed to the current ICAO Annex 14 text.

comment 1110 comment by: *Brussels Airport - BRU/EBBR*
GM-ADR-OPS.A.005
The text under PRE-FLIGHT ALTIMETER CHECK LOCATION (b) has two typing mistakes; the words on & it are omitted.
The text should be : "The elevation of a pre-flight altimeter check location is given as the average elevation, rounded to the nearest metre or foot, of the area **on** which **it** is located."

response Accepted
Text revised accordingly.

comment 1176 comment by: *Salzburger Flughafen GmbH*
Snow slush & ice
Cross Check with ICAO State Letter 41 since this wording will probably change.
Consistency with ICAO is necessary

response Accepted
The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.

comment 1199 comment by: *Federal Office of Civil Aviation FOCA*
FOCA suggests to complete the figures with the remark "the values are applicable while reading from the left to the right". They are the same figures as ICAO, but were not completely overtaken.

response Accepted
The proposed text has been included at point (b) in the DECLARED DISTANCES.

comment 1456 comment by: *Swedish Transport Agency*
We suggest to delete AT-VASIS in GM-ADR-OPS.A.005 on page 125. It is not used any longer.

response Accepted
AT-VASIS has been deleted.

comment 1462 comment by: *Swedish Transport Agency*
Check GM- ADR-OPS.A.005 — (g) on page 119. Even though copied from Annex 14 - taxi holding position is incorrect name, this position is: "Runway holding position". If the intention is to refer to holding position

	<p>other places on taxiways the correct name is: "Intermediate holding position". We suggest rewording from the comma after "aprons": "...including runway holding positions, intermediate holding positions and stopbars ..."</p>
response	<p>Accepted</p> <p>The comment is agreed and text is revised accordingly.</p>
comment	<p>1463 comment by: <i>Swedish Transport Agency</i></p> <p>Please provide GM on possible appropriate taxiway center line points in GM- ADR-OPS.A.005 (k)(2) on page 119.</p>
response	<p>Accepted</p> <p>New GM2 - ADR.OPS.A.005 (a) provides surveying requirements for runway thresholds, taxiways, and aircraft stands.</p>
comment	<p>1469 comment by: <i>Swedish Transport Agency</i></p> <p>We suggest to take out AIS in GM- ADR-OPS.A.005 (a) on page 120 and mandate reporting to the ANS only. AIS is included in the ANS, a subheading to ANS.</p>
response	<p>Accepted</p> <p>The term is changed from 'ANS' to 'Air Traffic Services' and the provision to report to the AIS has been retained.</p>
comment	<p>1472 comment by: <i>Swedish Transport Agency</i></p> <p>GM- ADR-OPS.A.005 on page 120: Please provide GM on managing ACN higher than PCN, ref. A14 2.6.7.</p>
response	<p>Accepted</p> <p>GM2 - ADR.OPS.C.010 (b) (1) provides guidance on overload operations.</p>
comment	<p>1473 comment by: <i>Flughafen Graz Betriebs GmbH</i></p> <p>Snow slush & ice</p> <p>Cross check with ICAO State Letter 41 since this wording will probably change.</p> <p>Consistency with ICAO is necessary .</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>1475 comment by: <i>Swedish Transport Agency</i></p> <p>We suggest to change "ATC phrasologies" to "RT phrasiology" in GM-</p>

response	<p>ADR-OPS.A.005 on page 124. Not all aerodromes in the scope provide ATC. Some provide AFIS.</p> <p>Accepted</p> <p>'ATC phraseologies' is replaced with 'RTF phraseologies'.</p>
comment	<p>1476 comment by: <i>Swedish Transport Agency</i></p> <p>We suggest to take out all information on AT-VASIS in GM- ADR-OPS.A.005 (b). It is not used any longer.</p>
response	<p>Accepted</p> <p>AT-VASIS has been deleted.</p>
comment	<p>1521 comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i></p> <p>ref. "Snow, slush or ice on runway" (b) Provide explanation for the terms describing the runway surface condition to reduce missinterpretation.</p> <p>Cross check with ICAO State Letter 41 since this wording will probably change. Consistency with ICAO is necessary .</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>1539 comment by: <i>ECA - European Cockpit Association</i></p> <p>Addfollowing paragraph under (a) of AERODROME DIMENSIONS AND RELATED INFORMATION: The geographical coordinates of obstacles in Area 2 (the part within the aerodrome boundary) and in Area 3 should be measured and reported to the aeronautical information services authority in degrees, minutes, seconds and tenths of seconds. In addition, the top elevation, type, marking and lighting (if any) of obstacles should be reported to the aeronautical information services authority.</p> <p>Justification: As per ICAO Annex 14, paragraph 2.5.5 see ICAO Annex 14 Appendix 8 and 5 for graphical data on obstacle information.</p>
response	<p>Accepted</p> <p>Text revised as proposed.</p>
comment	<p>1551 comment by: <i>ECA - European Cockpit Association</i></p> <p>Delete as follows under DECLARED DISTANCES: (a) The following distances are calculated to the nearest metre or foot for a runway and reported to the AIS and ANSP: (1) Take-off run available (TORA);</p>

- ~~(2)~~ (1) Take-off distance available (TODA);
~~(3) Accelerate-stop distance available (ASDA);~~
~~(4)~~ (2) Landing distance available (LDA).

Delete (b) and replace with the following:

The following distances should be calculated for a runway intended for use by international commercial air transport:

A) Take-off distance available (TODA), that is, the length of the runway which is declared available for take-off and is suitable for the ground run of an aeroplane taking-off. In most cases this corresponds to the physical length of the runway pavement; it does not include the length of any Stopway or Clearway.

b) Landing distance available (LDA), that is, the length of runway which is declared available and suitable for the ground run of an aeroplane landing. The landing distance commences at the threshold and extends for the length of the runway after the threshold. In most cases this corresponds to the physical length of the runway pavement. However, the threshold may be displaced from the extremity of the runway when it is considered necessary.

Note: Stopways and Clearways should be provided as additional safety areas.

Justification:

The TORA as defined in ICAO Annex 14 does not take in account the loss of runway length available due to alignment of the aeroplane prior to take-off. It should therefore be replaced by the new defined TODA as stated under (b).

Stopway and Clearway are additional safety areas and no standard performance tools. They should not be considered as declared distances. Therefore the definitions of an accelerate-stop distance and the ICAO definition of a TODA are unnecessary.

Reference: IFALPA Annex 14, paragraph 2.8 on Declared distances

response

Not accepted

The declared distances are defined in ICAO Annex 14 and the Agency will not deviate.

It is not possible for the aerodrome operator to calculate the loss of runway length available due to alignment of the aeroplane prior to take-off especially when a big variety of aircraft types are operating at the aerodrome. It is assumed that these calculations should be made by the flight crew.

comment

1553

comment by: ECA - European Cockpit Association

Delete as follows under DECLARED DISTANCES:

(a) The following distances are calculated to the nearest metre or foot for a runway and reported to the AIS and ANSP:

- ~~(1) Take-off run available (TORA);~~
~~(2)~~ (1) Take-off distance available (TODA);
~~(3) Accelerate-stop distance available (ASDA);~~
~~(4)~~ (2) Landing distance available (LDA).

Delete (b) and replace with the following:
The following distances should be calculated for a runway intended for use by international commercial air transport:

A) Take-off distance available (TODA), that is, the length of the runway which is declared available for take-off and is suitable for the ground run of an aeroplane taking-off. In most cases this corresponds to the physical length of the runway pavement; it does not include the length of any Stopway or Clearway.

b) Landing distance available (LDA), that is, the length of runway which is declared available and suitable for the ground run of an aeroplane landing. The landing distance commences at the threshold and extends for the length of the runway after the threshold. In most cases this corresponds to the physical length of the runway pavement. However, the threshold may be displaced from the extremity of the runway when it is considered necessary.

Note: Stopways and Clearways should be provided as additional safety areas.

Justification:

The TORA as defined in ICAO Annex 14 does not take in account the loss of runway length available due to alignment of the aeroplane prior to take-off. It should therefore be replaced by the new defined TODA as stated under (b).

Stopway and Clearway are additional safety areas and no standard performance tools. They should not be considered as declared distances. Therefore the definitions of an accelerate-stop distance and the ICAO definition of a TODA are unnecessary.

response

Not accepted

The declared distances are defined in ICAO Annex 14 and the Agency will not deviate.

It is not possible for the aerodrome operator to calculate the loss of runway length available due to alignment of the aeroplane prior to take-off especially when a big variety of aircraft types are operating at the aerodrome. It is assumed that these calculations should be made by the flight crew.

comment

1555

comment by: ECA - European Cockpit Association

Delete as follows under DECLARED DISTANCES:

(a) The following distances are calculated to the nearest metre or foot for a runway and reported to the AIS and ANSP:

~~(1) Take-off run available (TORA);~~

~~(2) (1) Take-off distance available (TODA);~~

~~(3) Accelerate-stop distance available (ASDA);~~

~~(4) (2) Landing distance available (LDA).~~

Delete (b) and replace with the following:

The following distances should be calculated for a runway intended for use

by international commercial air transport:

A) Take-off distance available (TODA), that is, the length of the runway which is declared available for take-off and is suitable for the ground run of an aeroplane taking-off. In most cases this corresponds to the physical length of the runway pavement; it does not include the length of any Stopway or Clearway.

b) Landing distance available (LDA), that is, the length of runway which is declared available and suitable for the ground run of an aeroplane landing.

The landing distance commences at the threshold and extends for the length of the runway after the threshold. In most cases this corresponds to the physical length of the runway pavement. However, the threshold may be displaced from the extremity of the runway when it is considered necessary.

Note: Stopways and Clearways should be provided as additional safety areas.

Justification:

The TORA as defined in ICAO Annex 14 does not take in account the loss of runway length available due to alignment of the aeroplane prior to take-off. It should therefore be replaced by the new defined TODA as stated under (b).

Stopway and Clearway are additional safety areas and no standard performance tools. They should not be considered as declared distances. Therefore the definitions of an accelerate-stop distance and the ICAO definition of a TODA are unnecessary.

response

Not accepted

The declared distances are defined in ICAO Annex 14 and the Agency will not deviate.

It is not possible for the aerodrome operator to calculate the loss of runway length available due to alignment of the aeroplane prior to take-off especially when a big variety of aircraft types are operating at the aerodrome. It is assumed that these calculations should be made by the flight crew.

comment

1608

comment by: Geneva International Airport (ROMIG)

Define the term "slope"

This can be interpreted in multiple ways.

response

Accepted

(a) (6) has been defined as 'longitudinal'.

comment

1609

comment by: Geneva International Airport (ROMIG)

Delete "to the nearest meter or foot"

This part of the sentence is not needed.

response	Not accepted This is an ICAO standard.
comment	1612 comment by: <i>Geneva International Airport (ROMIG)</i> "Snow slush & ice". Cross check with ICAO State Letter 41 since this wording will probably change. Consistency with ICAO.
response	Accepted The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.
comment	1636 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i> Snow slush & ice Cross check with ICAO State Letter 41 which will probably change this wording. Consistency with ICAO is necessary .
response	Accepted The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.
comment	1766 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i> 1. Change AERODROME DIMENSIONS AND RELATED INFORMATION Point (a)(6) to: "longitudinal and transversal slope" 2. Change "snow slush & ice" provision according to ICAO SL 11/41 new text of A14 § 2.9.
response	<i>Noted</i> The first comment is partially agreed and the word 'longitudinal' has been inserted in the text. The text comment is not agreed since the Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.
comment	1797 comment by: <i>AIRBUS</i> Snow, slush or ice on a runway - (4) "wet compacted snow" W We suggest to remove (4):

response	<p>The SNOWTAM format does not include a reporting code for wet compacted snow and it is not found in ICAO PANS ATM ATC Phraseology. Feedback from pilots is that they would not know what to do with this information.</p> <p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>1994 comment by: <i>Munich Airport International</i></p> <p>(a) Runway</p> <p>define "slope"</p>
response	<p>Accepted</p> <p>(a) (6) has been defined as 'longitudinal'.</p>
comment	<p>1995 comment by: <i>Munich Airport International</i></p> <p>(a)(5) & (b)(1)</p> <p>delete "to the nearest meter or foot"</p>
response	<p>Not accepted</p> <p>This is an ICAO standard.</p>
comment	<p>2141 comment by: <i>Danish Transport Authority</i></p> <p>GM contains SARPS from the ICAO Annex 14. This kind of presentation of SARPS gives difficulties and reduces the overview. Parts of the GM (condition of the movement area and related facilities) also includes the proposed amendments to ICAO Annex 14 according to state letter AN 4/1.1.52-11/41. This gives an unclear basis of comparing similarity between the NPA and the current ICAO Annex 14.</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>2142 comment by: <i>Danish Transport Authority</i></p> <p>Strength of pavements (c) : GM should be provided on managing ACN higher than PCN, reference to ICAO Annex 14, paragraph 2.6.7.</p>
response	<p>Accepted</p> <p>GM2 - ADR.OPS.C.010 (b) (1) provides guidance on overload operations.</p>
comment	<p>2143 comment by: <i>Danish Transport Authority</i></p>

	<p>Page 124 (e): We suggest to change "ATC phraseologies" to "RT phraseology" . Not all aerodromes in the scope provide ATC. Some provide AFIS.</p>
response	<p>Accepted</p> <p>'ATC phraseologies' is replaced with 'RTF phraseologies'.</p>
comment	<p>2144 comment by: <i>Danish Transport Authority</i></p> <p>EDITORIAL: Page 125 (h) : The use of cm (according to ICAO Annex 14) should be harmonized with ICAN Annex 15, Appendix 2 regarding the use of mm instead.</p>
response	<p>Noted</p> <p>Annex 14 deals with the accuracy of the measurement while Annex 15 deals with the reporting method.</p>
comment	<p>2190 comment by: <i>Flughafen Klagenfurt</i></p> <p>Snow slush & ice Cross check with ICAO State Letter 41 since this wording will probably change.</p> <p>Consistency with ICAO is necessary.</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>2205 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Condition of the movement area (a)(3) check wording with the ICAO amendment 10</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>2207 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>declared distances, not consistent with ICAO</p>
response	<p>Not accepted</p> <p>The declared distances are based on Attachment A, chapter 3 of Annex 14.</p>
comment	<p>2298 comment by: <i>ECA - European Cockpit Association</i></p> <p>Comment on RESCUE AND FIRE-FIGHTING, paragraph (c), p. 125, change as follows: (c) Changes in the level of protection normally available at the aerodrome for rescue and fire-fighting is notified to the appropriate air traffic services</p>

	<p>units and aeronautical information services units to enable those units to provide the necessary information to arriving and departing aircraft and be the subject of a Class 1 NOTAM. When such a change has been corrected, the above units are advised accordingly;</p> <p>Justification: Specifically, the necessary information should be the subject of a Class 1 NOTAM, and this should be stated. Reference: IFALPA Annex 14, paragraph 2.11.3</p>
response	<p>Noted</p> <p>This is addressed in AMC-ADR.OPS.A.015 (b).</p>
comment	<p>2392 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(snow, slush or ice on a runway) Definitions detailed in (b) are more than double the number in CAP 168</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet, and revert the proposal back to the current ICAO Annex 14 provisions.</p>
comment	<p>2458 comment by: <i>Isavia</i></p> <p>AMC.ADR.OPS.A.005 (b) c). Define what is meant by "Area 2" and "Area 3" and also check consistency with ADQ Regulation EC 73/2010.</p>
response	<p>Accepted</p> <p>Definitions for 'Area 2' and 'Area 3' has been provided in GM4 - ADR.OPS.A.005 (a).</p>
comment	<p>2459 comment by: <i>Isavia</i></p> <p>GM- ADR-OPS.A.005 on page 120: Please provide GM on managing ACN higher than PCN, ref. A14 2.6.7.</p>
response	<p>Accepted</p> <p>GM2 - ADR.OPS.C.010 (b) (1) provides guidance on overload operations.</p>
comment	<p>2517 comment by: <i>AEA - Association of European Airlines</i></p> <p>Page 211 Strength of pavements</p> <p>Comments</p> <p>Change</p> <p>The California Bearing Test Ratio (CBR) is a ratio for classifying the strength of the subsoil on which flexible pavements are built and must be expressed in %, e.g CBR 10 %, similar to the k-value (classifying the stiffness of the soil underneath the concrete pavement) which is expressed in NM/m3.</p>

response Noted

comment 2518 comment by: *AEA - Association of European Airlines*
AMC/GM to Annex III – Part-OPS
SUBPART A – AERODROME DATA (ADR.OPS.A)

Comments
Change

The ACN/PCN method must be part of the Regulation rather than being positioned in the AMC/GM part of the document

Clarification:
 The Pavement strength must be expressed in the Pavement Classification number (PCN) according to the extensively discussed and adopted Aircraft Classification Number / Pavement Classification Number method in the early 80ties by ICAO where the system replaced the Load Classification System.

This to provide the necessary standardization across the globe for assessing the impact of aircraft loading on pavements, which is a crucial factor for airlines in the planning phase of aircraft operations.

It would be a mistake and will provide a wrong message when European Regulations on Aerodromes will allow airport operators to classify their pavement strengths by means of an alternative means.

response Noted

comment 2559 comment by: *ADV -German Airports Association*
 GM.ADR.OPS.A.005 (a) (6)
 define slope

response Accepted
 (a) (6) has been defined as 'longitudinal'.

comment 2560 comment by: *ADV -German Airports Association*
 GM.ADR.OPS.A.005 (a) (5) & (b) (1)
 delete "to the nearest meter or foot"

response Not accepted
 The provisions are coming from ICAO Annex 14, 2.5.1 (a) & (b).

comment 2561 comment by: *ADV -German Airports Association*
 "Snow slush & ice"
 Justification
 be aware and cross check with ICAO state letter since this will probably

	<p>change consistency</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>2656 comment by: <i>Fraport AG</i></p> <p>GM-ADR-OPS.A.005 — Aeronautical Data AERODROME AND RUNWAY ELEVATIONS</p> <p>Editorial</p> <p>The following are measured and reported to the AIS: (a) The aerodrome elevation and geoid undulation at the aerodrome elevation position to the accuracy of one-half metre or foot; (b) For non-precision approaches, the elevation and geoid undulation of each threshold, the elevation of the runway end and any significant high and low points along the runway, to the accuracy of one-half metre or foot; (c) For precision approach runway, the elevation and geoid undulation of the threshold, the elevation of the runway end and the highest elevation of the touchdown zone, to the accuracy of one-quarter metre or foot;</p> <p>Proposed Text The following are measured and reported to the AIS: (a) The aerodrome elevation and geoid undulation at the aerodrome elevation position to the accuracy of one metre or one foot; (b) For non-precision approaches, the elevation and geoid undulation of each threshold, the elevation of the runway end and any significant high and low points along the runway, to the accuracy of one metre or one foot; (c) For precision approach runway, the elevation and geoid undulation of the threshold, the touchdown zone, to the accuracy of 0.1 metre or 0.1 foot;</p> <p>Fraport AG The figures mentioned in paragraphs (a), (b) and (c) are not in line with (EU) No 73/2010 and ICAO Annex 15, Appendix 7 (Table A7.2). Change figures accordingly.</p>
response	<p>Noted</p> <p>Annex 15 deals with publication resolution while Annex 14 refers to measurement and reporting to the aeronautical information services by the aerodrome operator.</p> <p>The proposed values are in accordance with ICAO Annex 14 2.3.1, 2.3.2 and 2.3.3.</p>
comment	<p>2657 comment by: <i>Fraport AG</i></p> <p>GM-ADR-OPS.A.005 — Aeronautical Data AERODROME DIMENSIONS AND RELATED INFORMATION (a) (5)</p>

	<p>Editorial displaced threshold location to the nearest metre or foot;</p> <p>Proposed Text displaced threshold location;</p> <p>Fraport AG Delete: "to the nearest metre or foot" Definition of measurement point is missing</p>
response	<p>Noted</p> <p>The proposed text is in accordance with ICAO Annex 14, 2.5.1.(a).</p>
comment	<p>2658 comment by: <i>Fraport AG</i></p> <p>GM-ADR-OPS.A.005 — Aeronautical Data AERODROME DIMENSIONS AND RELATED INFORMATION (a) (6)</p> <p>Question</p> <p>slope;</p> <p>Fraport AG What kind of slope is mend here, longitudinal or transversal?</p>
response	<p>Accepted</p> <p>(a) (6) has been defined as 'longitudinal'.</p>
comment	<p>2659 comment by: <i>Fraport AG</i></p> <p>GM-ADR-OPS.A.005 — Aeronautical Data AERODROME DIMENSIONS AND RELATED INFORMATION (b) (1)</p> <p>Editorial</p> <p>Length and width to the nearest metre or foot;</p> <p>Proposed Text Length and width;</p> <p>Fraport AG Delete: "to the nearest metre or foot" Definition of measurement point is missing</p>
response	<p>Noted</p> <p>The proposed text is in accordance with ICAO Annex 14, 2.5.1.(b).</p>
comment	<p>2660 comment by: <i>Fraport AG</i></p> <p>GM-ADR-OPS.A.005 — Aeronautical Data CONDITION OF THE MOVEMENT AREA AND RELATED FACILITIES Snow, slush or ice on runway</p>

	General
	Be aware and cross check with ICAO state letter since this will probably change - to ensure consistency!
response	Accepted
	The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part -OPS – SUBPART A – AERODROME DATA (ADR.OPS.A) – AMC-ADR-OPS.A.010 – Data quality requirements</p>	p. 126-131
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comment	26	comment by: <i>ACI EUROPE - Airports Council International</i>
		move it to GM
response	Not accepted	
	The provisions of this AMC are ICAO Standards. The proposal to move them to GM is not justified.	

comment	115	comment by: <i>Belfast International Airport - BFS/EGAA</i>
		Obstacles in Area 3 requires further clarification regarding the definition of Area 3
response	Accepted	
	Definitions of Area 2 and Area 3 has been provided in GM4 - ADR.OPS.A.005 (a).	

comment	356	comment by: <i>Avinor</i>
		AMC.ADR.OPS.A.010. Move it to GM.
response	Not accepted	
	The provisions of this AMC are ICAO Standards. The proposal to move them to GM is not justified.	

comment	714	comment by: <i>ADP : Aeroports de Paris</i>					
	<table border="1"> <tr> <td>Référence: AMC-ADR.OPS.A.010</td> <td>Data quality requirements</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Il convient de transférer ces dispositions en GM, notamment en ce qui concerne les niveaux d'intégrité qui sont sujet à discussion à l'OACI.</td> </tr> <tr> <td>Justification</td> <td>Le niveau d'intégrité 1x10⁻⁸ ne sera</td> </tr> </table>	Référence: AMC-ADR.OPS.A.010	Data quality requirements	Proposition/commentaire	Il convient de transférer ces dispositions en GM, notamment en ce qui concerne les niveaux d'intégrité qui sont sujet à discussion à l'OACI.	Justification	Le niveau d'intégrité 1x10 ⁻⁸ ne sera
Référence: AMC-ADR.OPS.A.010	Data quality requirements						
Proposition/commentaire	Il convient de transférer ces dispositions en GM, notamment en ce qui concerne les niveaux d'intégrité qui sont sujet à discussion à l'OACI.						
Justification	Le niveau d'intégrité 1x10 ⁻⁸ ne sera						

response Noted
Commission Regulation (EU) No 73/2010 on aeronautical data quality is based on Annex 15. The same requirements are mirrored in Annex 14.

comment 1347 comment by: *Euroairport Bâle-Mulhouse*
Attachment [#149](#)
Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC-ADR.OPS.A.010
Référence: AMC-ADR.OPS.A.010
Data quality requirements
Traduction de courtoisie
It is appropriate to transfer these provisions to GM, notably what concerns integrity levels which are discussed at ICAO. The integrity level 1×10^{-8} will never be reachable with the existing systems.

response Not accepted
The provisions of this AMC are ICAO Standards.

comment 1616 comment by: *Geneva International Airport (ROMIG)*
Move the article to GM
Too detailed for AMC.

response Not accepted
The provisions of this AMC are ICAO Standards.

comment 1758 comment by: *Aéroport de Marseille - MRS/LFML*
It is appropriate to transfer these provisions to GM, notably what concerns integrity levels which are discussed at ICAO. The integrity level 1×10^{-8} will never be reachable with the existing systems.

response Not accepted
The provisions of this AMC are ICAO Standards.

comment 1810 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*
Attachment [#150](#)
UAF NPA 2011-20 (B.II) AMC-ADR.OPS.A.010
Référence: AMC-ADR.OPS.A.010
Data quality requirements
Traduction de courtoisie
It is appropriate to transfer these provisions to GM, notably what concerns integrity levels which are discussed at ICAO.

response	<p>The integrity level 1×10^{-8} will never be reachable with the existing systems.</p> <p>Not accepted</p> <p>The provisions of this AMC are ICAO Standards.</p>
comment	<p>1874 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #151</p> <p>ADBM - NPA 2011-20 (B.II) AMC-ADR.OPS.A.010</p> <p>Référence: AMC-ADR.OPS.A.010 Data quality requirements</p> <p>Traduction de courtoisie It is appropriate to transfer these provisions to GM, notably what concerns integrity levels which are discussed at ICAO. The integrity level 1×10^{-8} will never be reachable with the existing systems.</p>
response	<p>Not accepted</p> <p>The provisions of this AMC are ICAO Standards.</p>
comment	<p>1904 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to transfer these provisions to GM, notably what concerns integrity levels which are discussed at ICAO. The integrity level 1×10^{-8} will never be reachable with the existing systems.</p>
response	<p>Not accepted</p> <p>The provisions of this AMC are ICAO Standards.</p>
comment	<p>2031 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>move to GM too complex</p>
response	<p>Not accepted</p> <p>The provisions of this AMC are ICAO Standards.</p>
comment	<p>2237 comment by: <i>Swedavia AB - Swedish airports (currently 11 airports)</i></p> <p>AMC.ADR.OPS.A.010. Move it to GM.</p>
response	<p>Not accepted</p> <p>The provisions of this AMC are ICAO Standards.</p>
comment	<p>2347 comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i></p>

Référence: AMC-ADR.OPS.A.010	Data quality requirements
Proposition/commentaire	Il convient de transférer ces dispositions en GM, notamment en ce qui concerne les niveaux d'intégrité qui sont sujet à discussion à l'OACI.
Justification	Le niveau d'intégrité 1x10-8 ne sera jamais atteignable avec les systèmes existants.
Traduction de courtoisie	It is appropriate to transfer these provisions to GM, notably what concerns integrity levels which are discussed at ICAO. The integrity level 1 × 10 ⁻⁸ will never be reachable with the existing systems.

response Not accepted

The provisions of this AMC are ICAO Standards.

comment 2562 comment by: *ADV -German Airports Association*
AMC.ADR.OPS.A.010
move it to GM

response Not accepted

The provisions of this AMC are ICAO Standards.

comment 2661 comment by: *Fraport AG*
AMC-ADR-OPS.A.010 — Data quality requirements
Editorial
Complete paragraph
Delete complete paragraph
Fraport AG
Paragraph is already addressed in (EU) No 73/2010, Article 6. To avoid duplication, this requirement should be deleted

response Not accepted

Commission Regulation (EU) No 73/2010 on aeronautical data quality is based on Annex 15. The same requirements are mirrored in Annex 14.

OPS.A.015 – Coordination between Aeronautical Information Services Providers, ANSPs and Aerodrome Operators

comment 222 comment by: KLM

Improve/change

It is important that the reference to the adherence to ICAO AIRAC effective dates make sense to the reader

Change information that is of operational significance and which can be planned in advance must be published **at least 2 AIRAC cycles** (months) prior to the change(s) to allow for proper awareness raising to operationally involved stakeholders.

response Noted

comment 264 comment by: CAA Norway

Lines 2 and 3 in AMC-ADR-OPS.A.015 (b) on page 132: AIS is a subcategory of ANS(P). Please reword.

response Accepted

The Agency decided to follow ICAO terminology, i.e. air traffic services and aeronautical information services.

comment 450 comment by: Estonian CAA

Lines 2 and 3 in AMC-ADR-OPS.A.015 (b) on page 132: AIS is a subcategory of ANS(P). Please reword.

response Accepted

The Agency decided to follow ICAO terminology, i.e. air traffic services and aeronautical information services.

comment 499 comment by: Icelandic Civil Aviation Administration

AMC-ADR-OPS.A.015 – (a) (10) - Changes to the disabled aircraft removal - Suggest to take out, this is outdated for airports in Europe, an aircraft simply diverts if the runway is closed due to a crashed aircraft.

response Not accepted

The information on the disabled aircraft removal plan is an ICAO Standard and provides information on the available resources at the aerodrome. This is not connected to a pilot's decision to divert at another aerodrome when the runway at the destination aerodrome is closed due to an immobilized aircraft.

comment 500 comment by: Icelandic Civil Aviation Administration

response	<p>Lines 2 and 3 in AMC-ADR-OPS.A.015 (b) on page 132: AIS is a subcategory of ANS(P). Please reword.</p> <p>Accepted</p> <p>The Agency decided to follow ICAO terminology, i.e. air traffic services and aeronautical information services.</p>
comment	<p>846 comment by: <i>Finnish Transport Safety Agency</i></p> <p>Lines 2 and 3 in AMC-ADR-OPS.A.015 (b) on page 132: AIS is a subcategory of ANS(P). Please reword.</p>
response	<p>Accepted</p> <p>The Agency decided to follow ICAO terminology, i.e. air traffic services and aeronautical information services.</p>
comment	<p>1478 comment by: <i>Swedish Transport Agency</i></p> <p>Lines 2 and 3 in AMC-ADR-OPS.A.015 (b) on page 132: AIS is a subcategory of ANS(P). Please reword.</p>
response	<p><i>Accepted</i></p> <p>The Agency decided to follow ICAO terminology, i.e. air traffic services and aeronautical information services.</p>
comment	<p>2088 comment by: <i>IATA</i></p> <p>AMC-ADR-OPS.A.015 – Coordination between Aeronautical Information Services Providers, ANSPs and Aerodrome Operators</p> <p>The aerodrome operator should report on matters of operational significance or affecting aircraft and aerodrome operations in order to take appropriate action, particularly in respect of the following: Construction or maintenance work etc.</p> <p>The aerodrome operator should observe the predetermined, internationally agreed AIRAC effective dates in addition to 14 days postage time (this is NOT clear) when submitting the raw information/data to aeronautical information services that affect charts and/or computerbased navigation systems which qualify to be notified by the aeronautical information</p> <p>Improve/change</p> <p>It is important that the reference to the adherence to ICAO AIRAC effective dates make sense to the reader</p> <p>Change information that is of operational significance and which can be planned in advance must be published at least 2 AIRAC cycles (months) prior to the change(s) to allow for proper awareness raising to operationally involved stakeholders.</p>
response	<p>Noted</p>

The Agency decided to follow the provisions of ICAO Annex 14 2.13.3

comment 2145 comment by: *Danish Transport Authority*
(a) With respect to the purpose of initial text under (a) the item (10) regarding changes to the disabled aircraft removal seems to be misplaced.

response Accepted
(a) (10) has been removed since it is already included at ADR - OPS.A.015 (a) (1).

comment 2460 comment by: *Isavia*
AMC-ADR-OPS.A.015 – (a) (10) - Changes to the disabled aircraft removal - Suggest to take out, this is outdated for airports in Europe, an aircraft simply diverts if the runway is closed due to a crashed aircraft.

response Not accepted
The information on the disabled aircraft removal plan is an ICAO Standard and provides information on the available resources at the aerodrome. This is not connected to a pilot's decision to divert at another aerodrome when the runway at the destination aerodrome is closed due to an immobilized aircraft.

comment 2511 comment by: *AEA - Association of European Airlines*
AMC-ADR-OPS.A.015 – Coordination between Aeronautical Information Services Providers, ANSPs and Aerodrome Operators
The aerodrome operator should report on matters of operational significance or affecting aircraft and aerodrome operations in order to take appropriate action, particularly in respect of the following:
Construction or maintenance work etc.

The aerodrome operator should observe the predetermined, **internationally agreed AIRAC effective dates in addition to 14 days postage time** (this is NOT clear) when submitting the raw information/data to aeronautical information services that affect charts and/or computerbased navigation systems **which qualify to be notified by the aeronautical information regulation and control (AIRAC) system.** (this is NOT clear)

Comments
Improve/change

It is important that the reference to the adherence to ICAO AIRAC effective dates make sense to the reader

Change information that is of operational significance and which can be planned in advance must be published **at least 2 AIRAC cycles** (months) prior to the change(s) to allow for proper awareness raising to operationally involved stakeholders.

response Noted
The Agency decided to follow the provisions of ICAO Annex 14 2.13.3

comment 2561 ❖ comment by: *ADV -German Airports Association*
"Snow slush & ice"
Justification
be aware and cross check with ICAO state letter since this will probably change consistency

response Accepted
The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC1-ADR-OPS.B.005 – Aerodrome Emergency Planning p. 133

comment 27 comment by: *ACI EUROPE - Airports Council International*
move it to GM

response Accepted
Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.

comment 198 comment by: *BAA*
Does the term "close to" mean that there should be an assessment of the 1000m area? If not, please include an assessment of this area in this paragraph

response Accepted
The assessment of the approach and departure areas within 1000 m of the runway threshold is included as point (c) in this AMC. However, the term 'close' has a wider scope and relates to arrival and departure routes, statistics of accidents around aerodromes, etc.

comment 275 comment by: *Manchester Airport plc*
(b) Consider including an assessment of 1000m area.difficult environs and access roads together.

response Accepted
The proposal has been added in AMC1-ADR.OPS.B.005.

comment	309	comment by: <i>Danish Transport Authority</i>						
	Reference to regarding the use of Human Factor Principles should be provided. At least reference to ICAO Doc 9683 and ICAO Doc 9806 should be provided. Also subjects like aerodrome organisations (aerodrome manual) and aerodrome maintenance should be covered with GM on human factor principles.							
response	Accepted							
	The requirement for an aerodrome emergency plan to observe Human Factors principles has been moved to GM3-ADR.OPS.B.005. Additional Guidance Material will be provided at a later stage.							
comment	317	comment by: <i>Belfast International Airport - BFS/EGAA</i>						
	What is classed as a significant portion?							
response	Accepted							
	The term 'significant portion' cannot be defined. At each aerodrome the departure and arrivals routes should be taken into account together with accident statistics around aerodromes, type of traffic serving the aerodrome, etc.							
comment	357	comment by: <i>Avinor</i>						
	AMC1.ADR.OPS.B.005 (a). Move it to GM.							
response	Accepted							
	Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document							
comment	604	comment by: <i>BAA Glasgow</i>						
	(B) Consideration should be made to include an assessment of at least 1,000m from the end of each runway, this assessment should include not only any water areas, but any other risk such as major road ways and railways etc. Consideration should also be made for access roads to difficult environs within the 1000m area.							
response	Accepted							
	The proposal has been added in AMC1-ADR.OPS.B.005.							
comment	716	comment by: <i>ADP : Aeroports de Paris</i>						
	<table border="1"> <tr> <td>Référence: AMC1-ADR.OPS.B005</td> <td>Aerodrome Emergency Planning</td> </tr> <tr> <td>Proposition/commentaire</td> <td>(a) Il convient de transférer ces dispositions en GM.</td> </tr> <tr> <td>Justification</td> <td>Les principes des facteurs humains pour le SSLIA sont encore trop flous pour</td> </tr> </table>		Référence: AMC1-ADR.OPS.B005	Aerodrome Emergency Planning	Proposition/commentaire	(a) Il convient de transférer ces dispositions en GM.	Justification	Les principes des facteurs humains pour le SSLIA sont encore trop flous pour
Référence: AMC1-ADR.OPS.B005	Aerodrome Emergency Planning							
Proposition/commentaire	(a) Il convient de transférer ces dispositions en GM.							
Justification	Les principes des facteurs humains pour le SSLIA sont encore trop flous pour							

	pouvoir être mis en AMC.
Traduction de courtoisie	It is appropriate to transfer the (a) to GM. The human factors principles for emergency operations are still too vague to be put in AMC.

response Accepted
Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.

comment 803 comment by: *Dublin Airport Authority*
Ref (a)
Consider including proposed modular approach to exercises (as is currently the case with ICAO).
Where a major incident has occurred taking account of lessons, the emergency plan should be considered adequately tested.
Ref (b)
Consider including an assessment of 1,000m area, assessing difficult environs and access roads together.

response Accepted
The proposal to include modular approach to exercises is not accepted. The Agency decided not to follow the proposals included at ICAO SL41-2011 since they haven't been finalised yet.
The second comment is already included in the proposed text and concerning the assessment of the area at a distance of 1 000 m from the threshold, it has been added in AMC1-ADR.OPS.B.005.

comment 909 comment by: *Cologne/Bonn Airport*
(a): move to GM

response Accepted
Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.

comment 927 comment by: *Union des Aéroports français - UAF*
Attachment [#152](#)
UAF NPA 2011-20 (B.II) AMC1-ADR.OPS.B005
Référence: AMC1-ADR.OPS.B005 Aerodrome Emergency Planning

	<p>Traduction de courtoisie It is appropriate to transfer the (a) to GM. The human factors principles for emergency operations are still too vague to be put in AMC.</p>
response	<p>Accepted</p> <p>Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.</p>
comment	<p>1270 comment by: Zürich Airport</p>
	<p>Relating to AMC1: Insert "aerodrome" before "operator".</p>
response	<p>Accepted</p>
	<p>Text revised and then moved to GM3 - ADR.OPS.B.005.</p>
comment	<p>1321 comment by: UK CAA</p>
	<p>Page No: 133</p>
	<p>Paragraph No: AMC1-ADR-OPS.B.005 (b)</p>
	<p>Comment: To clarify what is meant by "located close to" the AMC should set out the need for an assessment of the area 1,000m from the threshold similar to that in GM-ADR-DSN.T.900 (d) which says "Particular attention should be given to the provision of ready access to approach areas up to 1,000m from the threshold, or at least within the boundary area."</p>
	<p>Justification: Rather than carry out two assessments it would be more consistent to have one assessment for the 1,000m area that includes both access and the need for specialist rescue services.</p>
	<p>Proposed Text: Replacement of item (b) with: "The aerodrome operator should ensure the plan is based on an assessment of the approach and departure areas up to 1,000m from the threshold, or at least within the boundary area. The assessment should be carried out to provide for;</p> <p>(1) ready access; and</p> <p>(2) specialist rescue services where the area includes water and/or swampy areas where a significant portion of approach or departure operations take place over these areas."</p>
response	<p>Partially accepted</p>
	<p>The Agency recognises the fact that it is not necessary to carry out two assessments. The requirement for emergency services intervention extends to 1 000 m from the threshold while for the RFFS could be limited to the aerodrome boundary. The requirement had been split in two parts, one for the emergency services and one for the RFFS. However, the aerodrome operator could perform one assessment to cover the issue.</p> <p>New point (c) has been added in AMC1 - ADR.OPS.B.005</p>

comment	<p>1354 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #153</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC1-ADR.OPS.B.005</p> <p>Référence: AMC1-ADR.OPS.B005</p> <p>Aerodrome Emergency Planning</p> <p>Traduction de courtoisie</p> <p>It is appropriate to transfer the (a) to GM. The human factors principles for emergency operations are still too vague to be put in AMC.</p>
response	<p>Accepted</p> <p>Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.</p>
comment	<p>1556 comment by: <i>ECA - European Cockpit Association</i></p> <p>General comment on Annex II and III, Subpart B, on the RFFS Level of protection: The RFFS parts of this NPA are basically a reprint of ICAO Annex 14, Chapter 9.2. However, ICAO recommends a lot of other requirements in doc 9137, which are missing in the NPA. To be complete and to avoid having to refer to the other ICAO guidance and documents, the NPA should include these recommendations as well.</p>
response	<p>Accepted</p> <p>The Agency will provide further Guidance Material in the future.</p>
comment	<p>1711 comment by: <i>London Luton Airport Operations Ltd</i></p> <p>.</p>
response	<p>Noted</p>
comment	<p>1728 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>It is appropriate to transfer the (a) to GM. The human factors principles for emergency operations are still too vague to be put in AMC.</p>
response	<p>Accepted</p> <p>Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.</p>
comment	<p>1763 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #154</p>

	UAF	NPA	2011-20	(B.II)	AMC1-ADR.OPS.B.005
	Référence: AMC1-ADR.OPS.B005 Aerodrome Emergency Planning				
	Traduction de courtoisie It is appropriate to transfer the (a) to GM. The human factors principles for emergency operations are still too vague to be put in AMC.				
response	Accepted Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.				
comment	1903 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i> It is appropriate to transfer the (a) to GM or change "should" by "may". The human factors principles for emergency operations are still too vague to be put in AMC.				
response	Accepted Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.				
comment	1996 comment by: <i>Munich Airport International</i> move it to GM				
response	Accepted Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.				
comment	2034 comment by: <i>Shannon Airport</i> Consider including an assessment of 1,000m area, difficult environs and access roads together				
response	Accepted The proposal has been added in AMC1-ADR.OPS.B.005.				
comment	2123 comment by: <i>EAL AFS - Edinburgh Airport</i> AMC3-ADR-OPS.B.005-Aerodrome Emergency Exercise Consideration for a modular approach to Annual Exrcises (Currently sitting with ICAO). GM1-ADR.OR.D.015.AR.200(e) – Personnel Requirements, Qualification of personnel The term qualification denotes fitness for the purpose through fulfilment of				

the necessary conditions such as completion of required training, or acquisition of a diploma or degree. Qualification could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status. Qualification does not necessarily imply competence. It may be more consistent for the national authority (CAA) to set out qualification requirements in an AMC.

GM2-ADR-OPS.B.005-Coordination with other agencies

Consider new item (e) - "Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes."

Consider new item (f) - "Aerodrome operators should have a policy for incident command agreed with the external emergency services."

Consider new item (g) - "Rendezvous signs and directional arrows should be consistent and conform to national standards."

GM3-ADR-OPS.B.005-Command during emergencies

(a) In an on-airport incident many member states set out that the Emergency Services have command.

GM6-ADR-OPS.B005-Types of Emergencies

Consider adding "Aircraft Ground Incident" and "Local Standby Ground".

GM12-ADR-OPS.B.005-Emergency Exercises

(c) Tabletop exercises

(1) Tabletop exercises may be held every six months, except during that six month period when a full-scale emergency exercise is held.

Consider changing table-top exercises from 6 to 12 months, which is a more realistic timescale.

AMC2-ADR.OR.015 (g) – Personnel requirements, Instructors – Assessors

Fits with current UK practice. Consider supporting. Consider inclusion of competence scheme details in Aerodrome Manual.

(b) The aerodrome operator should ensure the plan includes the ready availability of, and coordination with, appropriate specialist rescue services to be able to respond to emergencies where an aerodrome is located close to water and/or swampy areas and where a significant portion of approach or departure operations takes place over these areas. Consider including an assessment of 1,000m area, difficult environs and access roads together. MC1-ADR-OPS.B.005 – Aerodrome Emergency Planning

AMC3-ADR-OPS.B.010-Number of RFFS Vehcles and Rescue Equipment

(3) If the number of expected movements of the aeroplanes in the RFF category is less than 700 in the busiest consecutive three months, the level of protection is not less than one category below the determined category.

Remission in the UK has been removed from Cat 3-10 airports. Any reduction would need to consider the implications on Task and Resource Analysis dealing with fire and rescue operations.

AMC3-ADR-OPS.B.010 – Number of RFFS vehicles and rescue equipment

(a) The aerodrome operator should ensure that:

(1) the minimum number of rescue and fire-fighting vehicles at the aerodrome, will be in accordance with the following table
Category 5 with remission would allow an A320 size aircraft to be dealt with by one vehicle, this is totally unrealistic.

For a Category 10 aircraft (A380) tactics may require 4 sectors and hence 4 vehicles.

ADR-OPS.B010 - Rescue and Fire-fighting Services

(2) adequate equipment, fire extinguishing agents and sufficient personnel are available in a timely manner;

Insert "facilities" after adequate.

AMC4-ADR-OPS.B.010 – Extinguishing agents

(b) Principal extinguishing agent includes:
(3) a foam meeting the minimum performance level C; or Level C
foam is not yet confirmed by ICAO.

(d) The amounts of water for foam production and of the complementary agents provided on the rescue and fire-fighting vehicles are in accordance with the determined aerodrome category and Table 1; This table is copied from ICAO and is based on the average size of aircraft. Operations for larger aircraft in the category should require a re-calculation.

except that for aerodrome categories 1 and 2, up to 100 % of the water may be replaced by complementary agent. Wording is incorrect
- only Categories 1 and 2 can substitute up to 100%.

(i) The discharge rate of complementary agents is not less than the values shown in

Table 1. Suggest new item (j) – "The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution."Also

New Item (k) – "A quantity of gaseous agent or CO2 should be provided for use on engine fires."

Also insert New Item (l) – “A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome.”
New item (m) – “Arrangements should be in place to manage the storage and testing of extinguishing agents.”
New Item (n) – “ A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting.”

AMC5-ADR-OPS.B.010 – Response time

(a) The aerodrome operator should ensure that:

(1) Rescue and fire-fighting service achieve a response time of two minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions; Consider adding that 50% of required discharge rate is available within response time.

(3) Any vehicle, other than the first responding vehicle(s), required to deliver the amount of extinguishing agents specified in Table 1 of AMC4-ADR-OPS.B.010 achieve continuous agent application and arrive in three minutes, but in no case exceeding four minutes, from the initial call. There is a potential for a gap in media production of 1 minute. The time from the first arriving to backup should be 1 minute.

AMC6-ADR-OPS.B.010 – Personnel

(a) The aerodrome operator should ensure that:

(1) During flight operations, sufficient trained personnel is detailed and readily available to ride the rescue and fire-fighting vehicles and to operate the equipment at maximum capacity.

Consider adding after flight operations “and 15 minutes after departure”. Consider adding requirement for personnel to be determined by a Task and Resource Analysis.

GM2-ADR-OPS.B.010 – Communication System

(a) Communication means are provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency; Consider this should be an AMC.

(c) Communication means are provided to ensure two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident.

Add in Item (d) - “Communication between crew members should be provided.” Add in Item (e) – “A system for monitoring the movement area for incidents should be provided.”

GM1-ADR.OPS.B.025 – Movement Area Driver Training

(a)(8) – RFFS driving
(8) specialist functions as required, for example, in rescue and fire-fighting.

Consider upgrading to AMC and include more detail.

response	Noted Refer to the responses in similar comments in the relevant parts.
comment	2146 comment by: <i>Danish Transport Authority</i> (c) : The paragraph should be GM, especially the description of 14 days of postage time. Local agreements on how to facilitate the needed documentation in time to be ready for a specific AIRAC date can only be GM. Also the possibilities to use NOTAM and AIP SUP exist.
response	Noted
comment	2180 comment by: <i>Glasgow Prestwick</i> consider including an assessment of 1000m response area
response	Accepted The proposal has been added in AMC1-ADR.OPS.B.005.
comment	2356 comment by: <i>East Midlands Airport - EMA/EGNX</i> (a) Comment: "Human factors principles" - statement is too vague, more specific requirements needed.
response	Accepted The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document. Further guidance will be provided in the future.
comment	2364 comment by: <i>East Midlands Airport - EMA/EGNX</i> (b) Consider including an assessment of the 1000m area, difficult environs and access roads (as per detailed requirements in CAP 168)
response	Accepted The proposal has been added in AMC1-ADR.OPS.B.005.
comment	2432 comment by: <i>SEARD - Societe d'exploitation des Aeroports de Rennes et Dinard</i> Attachment #155 SEARD NPA 2011-20 (B.II) AMC1-ADR.OPS.B.005 Réf�rence: AMC1-ADR.OPS.B.005 Aerodrome Emergency Planning

	<p>Traduction de courtoisie It is appropriate to transfer the (a) to GM. The human factors principles for emergency operations are still too vague to be put in AMC.</p>
response	<p><i>Accepted</i></p> <p>Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.</p>
comment	<p>2463 comment by: <i>Isavia</i></p> <p>We suggest to make the paragraphs from AMC1-ADR-OPS.B.005. to GM12-ADR-OPS.005 more general, to make sure that the paragraphs can be adopted, in accordance with National legislations in the field of Emergency management. Most European countries have a highly developed and efficient Emergency Management Systems, dealing with all kinds of emergency's. As such it is important that the Aerodrome Emergency plan adapts to the national legislation.</p>
response	<p>Accepted</p> <p>Some parts of the AMCs and GM have been redrafted in order to give that flexibility.</p>
comment	<p>2464 comment by: <i>Isavia</i></p> <p>AMC1.ADR.OPS.B.005 (a). Move it to GM.</p>
response	<p><i>Accepted</i></p> <p>Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.</p>
comment	<p>2469 comment by: <i>DAA Cork Airport</i></p> <p>(b) -Consider including an assessment of 1,000m area, difficult environs and access roads together.</p>
response	<p>Accepted</p> <p>The proposal has been added in AMC1-ADR.OPS.B.005.</p>
comment	<p>2563 comment by: <i>ADV -German Airports Association</i></p> <p>AMC1.ADR.OPS.B.005 (a) move it to GM</p>
response	<p>Accepted</p> <p>Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.</p>
comment	<p>2662 comment by: <i>Fraport AG</i></p>

	AMC1-ADR-OPS.B.005 — Aerodrome Emergency Planning (a)	
	Editorial	
	The aerodrome emergency plan of the operator should observe human factors principles to ensure optimum response in emergency operations;	
	Should be GM	
	Fraport	AG
	Recognition of human factors is not qualified for AMC.	
response	Accepted	
	Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document	

<p>NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS — SUBPART B — AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document</p>	<p>p. 133</p>
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comment	199	comment by: BAA
	(a) (2) include " and emergency planning arrangements"	
response	Accepted	
	Text revised accordingly and amongst other now includes local emergency planning arrangements in (a) (2).	
comment	358	comment by: Avinor
	AMC2-ADR-OPS.B.005. Aerodrome Emergency plan should adapt to the national legislation. National authorities are handling and managing all kind of emergencies crisis, also the coordination with other agencies. The Police is in command during the emergencies, except the firefighting where the commanding officer (CO) of fire department is in command. The airport operators CO for RFFS, is reporting to the CO of the local fire department. The emergency plan should include all kind of part-plan and the airport operator should establish a RFFS for first response.	
response	Noted	
	The Agency acknowledges the fact that the aerodrome emergency plan could be part of a national or local emergency plan, and managed by entities beyond the aerodrome operator. Nevertheless, the aerodrome operator should establish and apply minimum procedures to cope with arising emergencies (e.g. instructions and information to responsible staff to establish contacts with other parties planned to intervene quickly).	
comment	918	comment by: DGAC Direction Générale de l'aviation civile
	<u>1. Affected paragraphs</u>	

- ANNEX III — Part-OPS — ADR.OPS.B.005 — Aerodrome emergency planning (p65)
- AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document (p133)
- AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise (p133)
- All the corresponding GM (from GM1 to GM12)

2. Justification and proposed text / comment

- This comment is linked with comment 1202 in book I.
Implementing rule

The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 — Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;

(1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;

(2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;

(3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."

- Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise

"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any

deficiencies found during the full-scale aerodrome emergency exercise have been corrected; and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~"

· Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response

Accepted

The comment for this AMC is agreed.

In (a) (5) the word 'vicinity' is replaced by the word 'surroundings'.

comment

1322

comment by: UK CAA

Page No: 133

Paragraph No: AMC2-ADR-OPS.B.005 (a)(2)

Comment: The emergency plan document should set out the emergency planning arrangements.

Justification: For completeness and transparency the emergency plan should detail all the arrangements that cover the emergency planning process. It must be clear what the aerodrome and local arrangements are and how they are coordinated.

Proposed Text: Insert at the end of (2) " and **details of the aerodrome and local emergency planning arrangements and forums;**"

response

Accepted

(a) (2) has been revised to include the proposal.

comment

2208

comment by: Glasgow Prestwick

consider how far the RFFS will respond on the grid map 1mile, 2 mile, 5 mile etc

response

Accepted

(a) (5) has been revised to include a distance of approximately 5 nm (8 km) from the center of the aerodrome.

comment

2681

comment by: Isavia

AMC2-ADR-OPS.B.005.

Aerodrome Emergency plan should adapt to the national legislation. National authorities are handling and managing all kind of emergencies

crisis, also the coordination with other agencies. In Iceland the Police is in command during all emergencies, except structural firefighting where the commanding officer (CO) of local municipal fire department is in command. For many Airports there is one combined emergency plan and the aerodrome operator only has a limited part in the howl emergency plan. As it was stated on the EASA review meeting 19.06.2012, Annex 14 puts obligations on member states. Only a part of these obligations can be seen as the responsibility of the aerodrome manual.

response

Noted

The Agency acknowledges the fact that the aerodrome emergency plan could be part of a national or local emergency plan and managed by entities beyond the aerodrome operator. Nevertheless, the aerodrome operator should establish and apply minimum procedures to cope with arising emergencies (e.g. instructions and information to responsible staff to establish contacts with other parties planned to intervene quickly).

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise</p>	<p>p. 133</p>
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comment

28 comment by: *ACI EUROPE - Airports Council International*
 delete action item in brackets "(we have to check with R1 responses to SL)"

response

Accepted
 Text deleted.

comment

169 comment by: *Swedavia AB - Swedish airports (currently 11 airports)*
 (a) EASA need to define "full-scale". Suggest rewording to exercises. (Full scale exercises in larger airports is almost impossible to achieve, again, depending on the definition of full-scale).

response

Not accepted
 The term comes directly from ICAO Annex 14. The purpose of the full scale emergency exercise is to test the facilities and associated agencies involved in emergencies. It is not appropriate to reword it to 'exercises' because it is not in accordance with the scope of Annex 14

comment

200 comment by: *BAA*
 Please include the proposal in ICAO States letter 11-41

response

Noted
 The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment	276	comment by: <i>Manchester Airport plc</i>
	Consider including proposed modular approach to exercises (currently with ICAO)	
	(a) Consider where a real incident has occurred, taking account of lessons.	
response	Noted	
	The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future. The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.	
comment	501	comment by: <i>Icelandic Civil Aviation Administration</i>
	AMC3-ADR-OPS.B005 (a) on page 133: A full exercise every 2 years is not obtainable for many aerodromes! Many off airport agencies such as hospitals, police and rescue teams are doing full scale exercises in relation to several airports in their region, this is far to demanding. ICAO has issued a State Letter (AN 4/1.152 - 11/41) where 3 years are suggested. We support for 3 years for this matter, and strongly advise against 2 years.	
response	Noted	
	The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.	
comment	549	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Der Hinweis in der Klammer ist überflüssig und sollte gestrichen werden.	
response	Accepted	
	Text deleted	
comment	563	comment by: <i>Vienna International Airport</i>
	Cross Check with ICAO State Letter 41. Consistency with ICAO is necessary.	
	What about real emergencies? Do they compensate an exercise?	
response	Accepted	
	The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future. The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.	

comment

671 comment by: *Aéroport La Rochelle - LRH/LFBH*

Attachment [#156](#)

LFBH NPA 2011-20 (B.II) AMC3-ADR-OPS.B.005

Référence: AMC3-ADR-OPS.B.005
Aerodrome emergency exercise

Proposition/commentaire
Il convient de revoir cet AMC notamment :

- de modifier la manière suivante: "The aerodrome operator should ensure that the emergency plan is tested ~~by conducting~~ **with**."
- de prendre en compte la lettre aux Etats n°41 de l'OACI qui introduit une nouvelle catégorie d'exercice et des délais différents.

Justification
Ce n'est pas l'exploitant d'aérodrome qui conduit les exercices mais les autorités de police. Par ailleurs, la lettre aux Etats n°41 de l'OACI introduit de manière satisfaisante une 3eme catégorie, les essais modulaires, qui doit être reprise.

response

Accepted

The proposal to replace the word 'conducted' with the word 'with' is accepted and text revised accordingly

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment

715 comment by: *ADP : Aeroports de Paris*

Référence: AMC3-ADR-OPS.B.005	Aerodrome emergency exercise
Proposition/commentaire	Il convient de revoir cet AMC notamment : <ul style="list-style-type: none"> • de modifier la manière suivante: "The aerodrome operator should ensure that the emergency plan is tested by conducting with." • de prendre en compte la lettre aux Etats n°41 de l'OACI qui introduit une nouvelle catégorie d'exercice et des délais différents.
Justification	Ce n'est pas l'exploitant d'aérodrome qui conduit les exercices mais les autorités de police. Par ailleurs, la lettre aux Etats n°41 de l'OACI introduit de manière satisfaisante une 3eme catégorie, les essais modulaires, qui doit être reprise.
Traduction de courtoisie	It is appropriate to review this AMC

	<p>notably :</p> <ul style="list-style-type: none"> to modify in the following way: “The aerodrome operator should ensure that the emergency plan is tested by conducting with”.” To take into account the ICAO State Letter 41 which introduces a new category of exercise and different delays. <p>This is not the aerodrome operator who leads exercises but police authorities. Moreover, the ICAO State Letter 41 introduces in a satisfactory way a third category, modular tests, that must be taken up.</p>
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response Accepted

The proposal to replace the word ‘conducted’ with the word ‘with’ is accepted and text revised accordingly

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment 847 comment by: *Finnish Transport Safety Agency*

AMC3-ADR-OPS.B005 (a) on page 133: A full exercise every 2 years is not obtainable for many aerodromes! Many off airport agencies such as hospitals, police and rescue teams are doing full scale exercises in relation to several airports in their region, this is far to demanding. ICAO has issued a State Letter (AN 4/1.152 - 11/41) where 3 years are suggested. We support for 3 years for this matter, and strongly advise against 2 years.

response Noted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment 911 comment by: *Cologne/Bonn Airport*

remove "we have to check...."

response Accepted

Text deleted.

comment 918 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX III — Part-OPS — ADR.OPS.B.005 — Aerodrome emergency planning (p65)
- AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document (p133)
- AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise (p133)
- All the corresponding GM (from GM1 to GM12)

2. Justification and proposed text / comment

- This comment is linked with comment 1202 in book I.
Implementing rule

The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 — Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;

(1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;

(2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;

(3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."

- Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise

"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any

deficiencies found during the full-scale aerodrome emergency exercise have been corrected; and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~"

· Guidance materials
The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response

Noted

The comment for AMC3 is noted.
The Agency acknowledges the fact in many cases the aerodrome operator does not lead the emergency exercises. Irrespective of the assigned responsibilities, ICAO requirements should be met. For that reason the aerodrome operator should ensure, or take action to ensure, that aerodrome emergency exercises are taking place at the required intervals.

comment

930 comment by: *Union des Aéroports français - UAF*
Attachment [#157](#)

UAF NPA 2011-20 (B.II) AMC3-ADR-OPS.B.005

Référence: AMC3-ADR-OPS.B.005
Aerodrome emergency exercise

Traduction de courtoisie
It is appropriate to review this AMC notably :

- to modify in the following way: "The aerodrome operator should ensure that the emergency plan is tested ~~by conducting~~ **with**."
- To take into account the ICAO State Letter 41 which introduces a new category of exercise and different delays.

This is not the aerodrome operator who leads exercises but police authorities.
Moreover, the ICAO State Letter 41 introduces in a satisfactory way a third category, modular tests, that must be taken up.

response

Accepted

The proposal to replace the word 'conducted' with the word 'with' is accepted and text revised accordingly.

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment

1033 comment by: *Swedish Regional Airport Association*

Its impossible for a small airport to angage police, medical and fire and

	resque service, not employed by the airport, in a full scale exercise as often as each second year.
response	Noted

comment	<p>1177 comment by: <i>Salzburger Flughafen GmbH</i></p> <p>Cross Check with ICAO State Letter 41. Consistance with ICAO is necessary.</p> <p>What about real emergencies? Would a real emergency compensate an exercise?</p>
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response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p> <p>The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.</p>
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comment	<p>1183 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>(we have to check with R1 responses to SL) - What could be meant by that? - should be deleted.</p>
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response	<p>Accepted</p> <p>Text deleted.</p>
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comment	<p>1323 comment by: <i>UK CAA</i></p> <p>Page No: 133</p> <p>Paragraph No: AMC3-ADR-OPS.B005</p> <p>Comment: ICAO State Letter 11/41 has not been confirmed as yet. It appears within the NPA that some items from the State Letter are included whilst others are not. For consistency either the proposals in SL 11/41 should all be included or excluded and added in once confirmed.</p> <p>Justification: The current ICAO proposal for modular testing of the emergency plan has been agreed at the ICAO Aerodrome Panel and is awaiting confirmation. It would be future proofing the rules to include it. The States Letter is planned to be confirmed in July 2012. If the proposal is not confirmed this comment could be withdrawn.</p> <p>Proposed Text: "(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years and partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected; and/or</p> <p>b) a series of modular tests commencing in the first year and concluding in a full scale emergency exercise at intervals not exceeding three years;</p>
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	<p>and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency. "</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1381 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #158</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC3-ADR-OPS.B.005</p> <p>Référence: AMC3-ADR-OPS.B.005 Aerodrome emergency exercice</p> <p>Traduction de courtoisie It is appropriate to review this AMC notably :</p> <ul style="list-style-type: none"> • to modify in the following way: "The aerodrome operator should ensure that the emergency plan is tested by conducting with"." • To take into account the ICAO State Letter 41 which introduces a new category of exercise and different delays. <p>This is not the aerodrome operator who leads exercises but police authorities. Moreover, the ICAO State Letter 41 introduces in a satisfactory way a third category, modular tests, that must be taken up.</p>
response	<p>Accepted</p> <p>The proposal to replace the word 'conducted' with the word 'with' is accepted and text revised accordingly</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1477 comment by: <i>Flughafen Graz Betriebs GmbH</i></p> <p>Cross Check with ICAO State Letter 41. Consistency with ICAO is necessary.</p> <p>What about real emergencies? Do the compensate an exercise</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p> <p>The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.</p>

comment	<p>1524 comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i></p> <p>Cross Check with ICAO State Letter 41. Consistency with ICAO is necessary. What about real emergencies? Do the compensate an exercise?</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p> <p>The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.</p>
comment	<p>1607 comment by: <i>CAA Norway</i></p> <p>AMC3-ADR-OPS.B005 (a) on page 133: A full exercise every 2 years is not obtainable for many aerodromes. Many off airport agencies such as hospitals, police and rescue teams are doing full scale exercises in relation to several airports in their region, this is far too demanding. ICAO has issued a State Letter (AN 4/1.152 - 11/41) where 3 years are suggested. We support for 3 years for this matter, and advise against 2 years.</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1618 comment by: <i>Geneva International Airport (ROMIG)</i></p> <p>Delete action item in brackets "(we have to check with R1 responses to SL)" Formatting</p>
response	<p>Accepted</p> <p>Text deleted.</p>
comment	<p>1640 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i></p> <p>Cross check with ICAO State Letter 41. Consistency with ICAO is necessary . Do real emergencies compensate an exercise?</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p> <p>The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.</p>

comment	<p>1713 comment by: <i>London Luton Airport Operations Ltd</i></p> <p>If an aerodrome experiences a real event / accident / near miss or another aerodrome does, the aerodrome concerned should be able to plan in as a part of its emergency exercises a lesson for learning. Therefore an element of key learning could come from a modular type approach to emergency exercises. A full scale exercise each time may not provide the necessary learning.</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1730 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>It is appropriate to review this AMC notably :</p> <ul style="list-style-type: none">• to modify in the following way: "The aerodrome operator should ensure that the emergency plan is tested by conducting with"."• To take into account the ICAO State Letter 41 which introduces a new category of exercise and different delays. <p>This is not the aerodrome operator who leads exercises but police authorities. Moreover, the ICAO State Letter 41 introduces in a satisfactory way a third category, modular tests, that must be taken up.</p>
response	<p>Accepted</p> <p>The proposal to replace the word 'conducted' with the word 'with' is accepted and text revised accordingly</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1770 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i></p> <p>Delete the final sentence in brackets: <i>(we have to check with R1 responses to SL)</i>.</p>
response	<p>Accepted</p> <p>Text deleted.</p>
comment	<p>1795 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #159</p> <p>UAF NPA 2011-20 (B.II) AMC3-ADR-OPS.B.005</p>

Référence: AMC3-ADR-OPS.B.005
 Aerodrome emergency exercise

Traduction de courtoisie

It is appropriate to review this AMC notably :

- to modify in the following way: "The aerodrome operator should ensure that the emergency plan is tested ~~by conducting~~ with"."
- To take into account the ICAO State Letter 41 which introduces a new category of exercise and different delays.

This is not the aerodrome operator who leads exercises but police authorities.
 Moreover, the ICAO State Letter 41 introduces in a satisfactory way a third category, modular tests, that must be taken up.

response

Accepted

The proposal to replace the word 'conducted' with the word 'with' is accepted and text revised accordingly

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment

1869 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

[Attachment #160](#)

ADBM - NPA 2011-20 (B.II) AMC3-ADR-OPS.B.005

Référence: AMC3-ADR-OPS.B.005
 Aerodrome emergency exercise

Traduction de courtoisie

It is appropriate to review this AMC notably :

- to modify in the following way: "The aerodrome operator should ensure that the emergency plan is tested ~~by conducting~~ with"."
- To take into account the ICAO State Letter 41 which introduces a new category of exercise and different delays.

This is not the aerodrome operator who leads exercises but police authorities.
 Moreover, the ICAO State Letter 41 introduces in a satisfactory way a third category, modular tests, that must be taken up.

response

Accepted

The proposal to replace the word 'conducted' with the word 'with' is accepted and text revised accordingly

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be

given in the future.

comment	<p>1902 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to review this AMC notably :</p> <ul style="list-style-type: none">• to modify in the following way: "The aerodrome operator should ensure that the emergency plan is tested by conducting with"."• To take into account the ICAO State Letter 41 which introduces a new category of exercise and different delays. <p>This is not the aerodrome operator who leads exercises but police authorities. Moreover, the ICAO State Letter 41 introduces in a satisfactory way a third category, modular tests, that must be taken up.</p>
response	<p>Accepted</p> <p>The proposal to replace the word 'conducted' with the word 'with' is accepted and text revised accordingly.</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>

comment	<p>1914 comment by: <i>Dublin Airport Authority</i></p> <p>Consider including proposed modular approach to exercises (currently with ICAO).</p> <p>Where a major incident has occurred taking account of lessons, the emergency plan should be considered adequately tested.</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p> <p>The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.</p>

comment	<p>1997 comment by: <i>Munich Airport International</i></p> <p>(b)</p> <p>delete action item in brackets "(we have to check with R1 responses to SL)"</p>
response	<p>Accepted</p> <p>Text deleted</p>

comment	<p>2035 comment by: <i>Shannon Airport</i></p> <p>Consider including proposed modular approach to exercises (currently with ICAO).</p>
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	<p>Where a major incident has occurred taking account of lessons, the emergency plan should be considered adequately tested.</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p> <p>The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.</p>
comment	<p>2080 comment by: <i>Infratil Airports Europe Ltd</i></p> <p>Page No: 113</p> <p>Paragraph No: AMC3-ADR-OPS.B.005</p> <p>Comment We suggest that an alternative option is available in this case. Instead of requiring a full scale exercise that tests all elements of the plan every two years, it is suggested that aerodromes are permitted to spread the testing of their plan across a longer time period of three years and conduct a number of modular exercises culminating with a partial live exercise that incorporates the "blue light" / fire fighting portion of the plan. This would be far more manageable for the aerodromes and would allow for better learning to be achieved.</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>2107 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>AMC3-ADR-OPS.B005 (a) and (b) - Full scale emergency exercise intervals.</p> <p>Timelines may not fit in with local strategic coordination groups, emergency planning arrangements, critical to have Cat 1 responders involved.</p> <p>Consider having modular approach to exercises (currently with ICAO) and where a real incident has occurred take into account lessons learned. This allows for a more in depth concentration on the component parts rather than a full scale exercise which may only skim the surface of some items.</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future</p>
comment	<p>2119 comment by: <i>AENA - Aeropuertos Españoles y Navegación Aérea</i></p>

It is proposed that change because in Spain the Aerodrome Operator does not have responsibilities outside the aerodrome.

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

"The aerodrome operator should ~~ensure that~~ participate within the limits of its tasks and responsibilities to the tests of the emergency plan ~~is tested by conducting~~ which should include:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;

and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~"

response

Noted

The Agency acknowledges the fact in many cases the aerodrome operator does not lead the emergency exercises. Irrespective of the assigned responsibilities, ICAO requirements should be met. For that reason the aerodrome operator should ensure, or take action to ensure, that aerodrome emergency exercises are taking place at the required intervals.

comment

2147

comment by: *Danish Transport Authority*

In extension to the comments under GM- ADR-OPS.A.005 the proposal in state letter AN 4/1.1.52-11/41 regarding a more risk based assesment of full-scale emergency exercises and period is not included in this case. We support the introduction of a more risk based assesment of the emergency exercises.

response

Noted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment

2181

comment by: *Glasgow Prestwick*

consider modular approach to exercises

response

Noted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment

2191

comment by: *Flughafen Klagenfurt*

Cross Check with ICAO State Letter 41.
Consistency with ICAO is necessary.

What about real emergencies? Do they compensate an exercise?

response

Accepted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.

comment

2324 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence: AMC3-ADR-OPS.B.005	Aerodrome emergency exercise
Proposition/commentaire	<p>Il convient de revoir cet AMC notamment :</p> <ul style="list-style-type: none"> • de modifier la manière suivante: “The aerodrome operator should ensure that the emergency plan is tested by conducting with”. • de prendre en compte la lettre aux Etats n°41 de l'OACI qui introduit une nouvelle catégorie d'exercice et des délais différents.
Justification	<p>Ce n'est pas l'exploitant d'aérodrome qui conduit les exercices mais les autorités de police. Par ailleurs, la lettre aux Etats n°41 de l'OACI introduit de manière satisfaisante une 3eme catégorie, les essais modulaires, qui doit être reprise.</p>
Traduction de courtoisie	<p>It is appropriate to review this AMC notably :</p> <ul style="list-style-type: none"> • to modify in the following way: “The aerodrome operator should ensure that the emergency plan is tested by conducting with”. • To take into account the ICAO State Letter 41 which introduces a new category of exercise and different delays. <p>This is not the aerodrome operator who leads exercises but police authorities. Moreover, the ICAO State Letter 41 introduces in a satisfactory way a third category, modular tests, that must be taken up.</p>

response

Accepted

The proposal to replace the word 'conducted' with the word 'with' is

accepted and text revised accordingly

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment 2472 comment by: *DAA Cork Airport*

(a) -
Consider including proposed modular approach to exercises (currently with ICAO).

Where a major incident has occurred taking account of lessons, the emergency plan should be considered adequately tested.

response Accepted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

The consideration of real emergencies has already been included at the end of this AMC and is in line with ICAO provisions.

comment 2564 comment by: *ADV -German Airports Association*

AMC3.ADR.OPS.B.005 (b)
delete action item in brackets "(we have to check with R1 responses to SL)"

response Accepted

Text deleted

comment 2580 comment by: *LJL Airport - Liverpool John Lennon Airport*

AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise
The aerodrome operator should ensure that the emergency plan is tested by conducting:
(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years

response Noted

comment 2584 comment by: *EAL AFS - Edinburgh Airport*

AMC3-ADR-OPS.B.005-Aerodrome Emergency Exercise

Consideration for a modular approach to Annual Exercises (Currently sitting with ICAO).

response Noted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be

given in the future.

comment	2600 comment by: <i>Stansted Airport - Daren BARTHAM</i> AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise The aerodrome operator should ensure that the emergency plan is tested by conducting: (a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; Consider including proposed modular approach to exercises (currently with ICAO) and where a real incident has occurred taking account of lessons.
response	Noted The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment	2663 comment by: <i>Fraport AG</i> AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise Editorial ... and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; (we have to check with R1 responses to SL) . Proposed Text ... and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency. Fraport AG Check for: “; (we have to check with R1 responses to SL)” and delete it from AMC
response	Accepted Text deleted

comment	2682 comment by: <i>Isavia</i> AMC3-ADR-OPS.B005 (a) on page 133: A full exercise every 2 years is not obtainable for many aerodromes! Many off airport agencies such as hospitals, police and rescue teams are doing full scale exercises in relation to several airports in their region, this is far to demanding. It is impossible for the aerodrome operator to demand all external participants to participate in a full-scale aerodrome emergency exercise every 2 year. ICAO has issued a State Letter (AN 4/1.152 - 11/41) where 3 years are suggested. We support for 3 years for this matter, and strongly advise against 2 years.
response	Noted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS –
SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT
AND INSTALLATIONS (ADR.OPS.B) – GM1-ADR-OPS.B.005 –** p. 133-134
Purpose of the Aerodrome Emergency Plan

comment

918 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX III – Part-OPS – ADR.OPS.B.005 – Aerodrome emergency planning (p65)
- AMC/GM to ANNEX III – Part-OPS – AMC2-ADR-OPS.B.005 – Aerodrome Emergency Plan Document (p133)
- AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise (p133)
- All the corresponding GM (from GM1 to GM12)

2. Justification and proposed text / comment

- This comment is linked with comment 1202 in book I.
Implementing rule

The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 – Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

- (1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;*
- (1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;*
- (2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;*
- (3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."*

- Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including

aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;

and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; (we have to check with R1 responses to SL)."

· Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response *Noted*

comment 2206 comment by: *Glasgow Prestwick*
consider salvage plan and business continuity plan

response *Noted*
The Agency provided this material based on ICAO Doc.9137 Part 7. However, the provisions of this GM don't prevent the aerodrome operator to include salvage and business continuity plan.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – GM2-ADR-OPS.B.005 – Coordination** p. 134
with other agencies

comment 201 comment by: *BAA*
Please include some guidance about medical supplies and airport signage e.g. RVP signs

response *Accepted*
New points (e) and (f) have been added.

comment	277	comment by: <i>Manchester Airport plc</i>
	(d) Consider new item (e) "Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes".	
	Consider new item (f) "Aerodrome operators should have a policy for incident command agreed with external emergency services".	
	Consider new item (g) " Rendezvous signs and directional arrows should be consistent and conform to national standards".	
response	Accepted	
	New points (e) and (f) have been added addressing the issues of medical supplies and airport signage. Agreements with external emergency services for incident command have already been included in point (c).	
comment	316	comment by: <i>Belfast International Airport - BFS/EGAA</i>
	(d) this would be subject to the severity of the incident	
response	Noted	
	It is not well explained how the severity of the incident will affect the implementation of the emergency plan when an accident is taking place on-airport or off-airport.	
comment	605	comment by: <i>BAA Glasgow</i>
	(D) Give consideration to "Aerodrome operators being allowed to assess the level of medical supplies to be held on their aerodrome for emergency purposes based on the largest aircraft to use their aerodrome.."	
	Give consideration to - "Aerodrome operators having a policy for incident command which has been agreed with the external emergency services that attend their aerodrome."	
	Give consideration to - "Rendezvous signs and directional arrows being used to guide the external emergency service to the RVP, these signs should be consistent and conform to appropriate national standards."	
response	Accepted	
	New points (e) and (f) have been added addressing the issues of medical supplies and airport signage. Agreements with external emergency services for incident command have already been included in point (c).	
comment	805	comment by: <i>Dublin Airport Authority</i>
	· Consider new items-	
	(e) - Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes";	

· (f) – “Aerodrome operators should have a policy for incident command agreed with external emergency services.”;

(g) – “Rendezvous signs and directional arrows should be consistent and conform to current standards.”

response Accepted

New points (e) and (f) have been added addressing the issues of medical supplies and airport signage. Agreements with external emergency services for incident command have already been included in point (c).

comment 918 ❖ comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX III — Part-OPS — ADR.OPS.B.005 — Aerodrome emergency planning (p65)
- AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document (p133)
- AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise (p133)
- All the corresponding GM (from GM1 to GM12)

2. Justification and proposed text / comment

· This comment is linked with comment 1202 in book I.
Implementing rule

The word “vicinity” is used instead of “surroundings” which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative’s responsibility (“préfet”). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 — Aerodrome emergency planning

“Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;

(1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;

(2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;

(3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness.”

· Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word “vicinity” at the end should be replaced by “surroundings”.

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the

current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

"The aerodrome operator should ~~ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting~~ which should include:

- (a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and*
- (b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected; and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~"*

· Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response

Noted

comment

1324

comment by: UK CAA

Page No: 134

Paragraph No: GM2-ADR-OPS.B.005

Comment: It is considered beneficial to add some guidance on medical supplies and signage.

Justification: For completeness it is considered beneficial to include all elements of co-ordination in this list.

Proposed Text: Add items:

"(e) the level of medical supplies to be held on the aerodrome for emergency purposes.

(f) agreed signage for directional and rendezvous points taking account of national highway standards."

response

Accepted

New points (e) and (f) have been added addressing the issues of medical supplies and airport signage.

comment

1714

comment by: London Luton Airport Operations Ltd

	<p>(d) The aerodrome emergency plan is implemented similarly whether it is an on-airport or an off-airport aircraft accident/incident. Consider new Item (e) – “Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes.” Consider new item (f) – “Aerodrome operators should have a policy for incident command agreed with external emergency services.” Consider new Item (g) – “Rendezvous signs and directional arrows should be consistent and conform to national standards.”</p>
response	<p>Accepted</p> <p>New points (e) and (f) have been added addressing the issues of medical supplies and airport signage. Agreements with external emergency services for incident command have already been included in point (c).</p>
comment	<p>2036 comment by: <i>Shannon Airport</i></p> <ul style="list-style-type: none">· Consider new item (e) – “Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes”;· Consider new item (f) – “Aerodrome operators should have a policy for incident command agreed with external emergency services.”; <p>Consider new item (g) – “Rendezvous signs and directional arrows should be consistent and conform to current standards.”</p>
response	<p>Accepted</p> <p>New points (e) and (f) have been added addressing the issues of medical supplies and airport signage. Agreements with external emergency services for incident command have already been included in point (c).</p>
comment	<p>2365 comment by: <i>Norwich International Airport</i></p> <p>GM2-ADR-OPS.B.005 — Coordination with other agencies</p> <p>Consider new Item (e) – “Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes.”</p>
response	<p>Accepted</p> <p>New point (f) have been added addressing the issue of medical supplies.</p>
comment	<p>2394 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(d) Consider new item (e) "Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes".</p>
response	<p>Accepted</p> <p>New point (f) have been added addressing the issue of medical supplies.</p>
comment	<p>2395 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>Consider new item (f) "Aerodrome operators should have a policy for</p>

	incident command agreed with external emergency services".
response	<p>Noted</p> <p>The issue is already addressed in (c).</p>
comment	<p>2408 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(d) The aerodrome emergency plan is implemented similarly whether it is an on-airport or an off-airport aircraft accident/incident.</p> <p>Comment: The emergency plan differs greatly dependent upon whether it is on or off site.</p>
response	<p>Noted</p> <p>The aerodrome emergency plan should normally contain the same procedures irrespective if the accident is on or off the airport (e.g. alerting services, communication means, rescue equipment, etc.). What could be different, is the overall responsibility for handling the accident (e.g. in some States is the responsibility of the aerodrome operator, in some others the local authorities, etc.).</p>
comment	<p>2409 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(c) (5) predetermination of the legal authorities and liabilities of all cooperating emergency personnel.</p> <p>Comment: Not the Aerodrome's role.</p>
response	<p>Noted</p> <p>The Agency acknowledges the fact the legal authorities and liabilities of all cooperating emergency personnel might not be the responsibility of the aerodrome operator to decide, however, this information should be included in the aerodrome emergency plan.</p>
comment	<p>2410 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(c)(1) Comment: Needs to be clearer which agencies should be considered here.</p>
response	<p>Accepted</p> <p>Text revised to include some examples.</p>
comment	<p>2411 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(c) Comment: Need to define who mutual aid agreements are required with i.e. emergency services, handling agents, AAIB etc.</p>
response	<p>Accepted</p> <p>Refer to (c) (1) which has been revised to include some examples.</p>
comment	<p>2412 comment by: <i>East Midlands Airport - EMA/EGNX</i></p>

	(a) Definition of "surrounding community" required
response	<p>Noted</p> <p>It is not possible to define the 'surrounding community'. The term comes with the notion that any external assistance could come from the surrounding community in order to ensure quick response.</p>
comment	<p>2441 comment by: <i>London Biggin Hill Airport</i></p> <p>GM2.ADR-OPS.B.005 consider the addition of new items (e) Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency requirements. (f) Aerodrome operators should have a policy for incident command agreed with external services. (g) Rendezvous and directional signs should be consistent with national standards.</p>
response	<p>Accepted</p> <p>New points (e) and (f) have been added addressing the issues of medical supplies and airport signage. Agreements with external emergency services for incident command have already been included in point (c).</p>
comment	<p>2466 comment by: <i>Isavia</i></p> <p>Insert "or governmental agencies" after "aerodrome operator".</p>
response	<p>Noted</p>
comment	<p>2476 comment by: <i>DAA Cork Airport</i></p> <ul style="list-style-type: none"> · Consider new item (e) – "Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes"; · Consider new item (f) – "Aerodrome operators should have a policy for incident command agreed with external emergency services."; <p>Consider new item (g) – "Rendezvous signs and directional arrows should be consistent and conform to current standards."</p>
response	<p>Accepted</p> <p>New points (e) and (f) have been added addressing the issues of medical supplies and airport signage. Agreements with external emergency services for incident command have already been included in point (c).</p>
comment	<p>2586 comment by: <i>EAL AFS - Edinburgh Airport</i></p> <p>GM2-ADR-OPS.B.005-Coordination with other agencies</p> <p>Consider new item (e) - "Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes."</p> <p>Consider new item (f) - "Aerodrome operators should have a policy for incident command agreed with the external emergency services."</p>

	<p>Consider new item (g) - "Rendezvous signs and directional arrows should be consistent and conform to national standards."</p>
response	<p>Accepted</p> <p>New points (e) and (f) have been added addressing the issues of medical supplies and airport signage. Agreements with external emergency services for incident command have already been included in point (c).</p>
comment	<p>2601 comment by: <i>Stansted Airport - Daren BARTHAM</i></p> <p>GM2-ADR-OPS.B.005 — Coordination with other agencies (d) The aerodrome emergency plan is implemented similarly whether it is an on-airport or an off-airport aircraft accident/incident. Consider new Item (e) – "Aerodrome operators should assess the level of medical supplies to be held on the aerodrome for emergency purposes." Consider new item (f) – "Aerodrome operators should have a policy for incident command agreed with external emergency services." Consider new Item (g) – "Rendezvous signs and directional arrows should be consistent and conform to national standards."</p>
response	<p>Accepted</p> <p>New points (e) and (f) have been added addressing the issues of medical supplies and airport signage. Agreements with external emergency services for incident command have already been included in point (c).</p>

NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS — SUBPART B — AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) — GM3-ADR-OPS.B.005 — Command during emergencies p. 134-135

comment	<p>5 comment by: <i>Finnish Transport Safety Agency</i></p> <p>In Finland Rescue Law defines communal rescue authority to be in command during emergencies also in an on-airport accidents.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c) (2), in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>29 comment by: <i>ACI EUROPE - Airports Council International</i></p> <p>□ insert after "aerodrome operator" "or local government"</p> <p>Justification: basic national law</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or</p>

arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 139 comment by: CAA-NL
Please add 'or local government' after 'aerodrome operator' to give some flexibility for local practises.

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 202 comment by: BAA
This is confusing when read in conjunction with GM2-ADR-OPS.B.005(c)(2)

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 278 comment by: Manchester Airport plc
(a) Local Authority emergency services have command.

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 319 comment by: Belfast International Airport - BFS/EGAA
(a) aerodrome operator is normally in command during the early stages however this changes when the state fire authority arrive at the site.

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment	321	comment by: <i>CAA Austria - Ministry of Transport</i>
	(a) Insert after aerodrome operator or local government This allows compatibility with national law	
response	Accepted The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.	
comment	359	comment by: <i>Avinor</i>
	GM3.ADR.OPS.B.005 (a). Insert "or local government" after "aerodrome operator".	
response	Accepted The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.	
comment	522	comment by: <i>CTIF The International Fire and Rescue Organization - Airport Commission</i>
	For most countries in Europe this is not allowed during the law.	
response	Accepted The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.	
comment	551	comment by: <i>Flughafen Düsseldorf GmbH</i>
	a) Es ist nicht immer der Flughafenbetreiber sondern ggf. die Behörde verantwortlich, daher sollte "or local government" ergänzt werden. c) Dies ist in Deutschland über Gesetze geregelt, wenn auch relativ komplex und abhängig von den Einsatzkräften. Insofern so nicht richtig!	
response	Accepted The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.	
comment	565	comment by: <i>Vienna International Airport</i>

	(a) Chance to:aerodrome operator or local government								
response	Accepted The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.								
comment	606 comment by: <i>BAA Glasgow</i> (A) Within the UK, the external emergency Services have command.								
response	Accepted The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.								
comment	717 comment by: <i>ADP : Aeroports de Paris</i>								
	<table border="1"> <tr> <td>Référence: GM3-ADR-OPS.B.005</td> <td>Command during emergencies</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Il convient de supprimer les points (a) et (b).</td> </tr> <tr> <td>Justification</td> <td>C'est l'autorité locale qui est normalement pilote en cas d'urgence. Tout dépend des règles nationales et locales relatives à l'organisation des secours. De plus, en cas d'urgence on ne peut avoir qu'une réponse globale gérée par l'autorité locale.</td> </tr> <tr> <td>Traduction de courtoisie</td> <td>It is appropriate to delete the points (a) and (b). This is the local authority which is normally in command during emergencies. All depends on national and local rules about aid emergency organisation. Moreover, in case of emergency we cannot have a global response led by the local authority.</td> </tr> </table>	Référence: GM3-ADR-OPS.B.005	Command during emergencies	Proposition/commentaire	Il convient de supprimer les points (a) et (b).	Justification	C'est l'autorité locale qui est normalement pilote en cas d'urgence. Tout dépend des règles nationales et locales relatives à l'organisation des secours. De plus, en cas d'urgence on ne peut avoir qu'une réponse globale gérée par l'autorité locale.	Traduction de courtoisie	It is appropriate to delete the points (a) and (b). This is the local authority which is normally in command during emergencies. All depends on national and local rules about aid emergency organisation. Moreover, in case of emergency we cannot have a global response led by the local authority.
Référence: GM3-ADR-OPS.B.005	Command during emergencies								
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Traduction de courtoisie	It is appropriate to delete the points (a) and (b). This is the local authority which is normally in command during emergencies. All depends on national and local rules about aid emergency organisation. Moreover, in case of emergency we cannot have a global response led by the local authority.								
response	Accepted The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a								

requirement to establish a command authority without specifying who this could be.

comment 731 comment by: *Finavia*
According to Finnish law in an accident the municipal fire and rescue authority is in command.

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 806 comment by: *Dublin Airport Authority*
Detailed guidance should be made available in relation to how national legislative provisions that give command and control to National Emergency Services, for example in Ireland of the National Framework for Major Emergency Management, will be dealt with and considered by competent authorities.

Ref - (a)

Suggest addition of "or local government" after aerodrome operator in point to resolve this issue as this is the case under Member States national law in a number of instances.

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 918 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX III — Part-OPS — ADR.OPS.B.005 — Aerodrome emergency planning (p65)
- AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document (p133)
- AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise (p133)
- All the corresponding GM (from GM1 to GM12)

2. Justification and proposed text / comment

- This comment is linked with comment 1202 in book I.
Implementing rule

The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i).

ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 – Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;

(1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;

(2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;

(3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."

· Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

~~"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:~~

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;

and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~"

· Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response	<i>Noted</i>				
comment	920 comment by: <i>Cologne/Bonn Airport</i>				
	(a): insert "or local government" after aerodrome operator; Federal law in Germany				
response	Accepted				
	The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.				
comment	931 comment by: <i>Union des Aéroports français - UAF</i>				
	Attachment #161				
	UAF	NPA	2011-20	(B.II)	GM3-ADR-OPS.B.005
	Référence: GM3-ADR-OPS.B.005				
	Command during emergencies				
	Traduction de courtoisie				
	It is appropriate to delete the points (a) and (b). This is the local authority which is normally in command during emergencies. All depends on national and local rules about aid emergency organisation.				
	Moreover, in case of emergency we cannot have a global response led by the local authority.				
response	Accepted				
	The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.				
comment	1178 comment by: <i>Salzburger Flughafen GmbH</i>				
	(a) Change to:aerodrome operator or local government...				
response	Accepted				
	The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.				
comment	1309 comment by: <i>Euroairport Bâle-Mulhouse</i>				
	Attachment #162				

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II)GM3-ADR-OPS.B.005

Référence: GM3-ADR-OPS.B.005

Command during emergencies

Traduction de courtoisie

It is appropriate to delete the points (a) and (b). This is the local authority which is normally in command during emergencies. All depends on national and local rules about aid emergency organisation.

Moreover, in case of emergency we cannot have a global response led by the local authority.

response

Accepted

The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment

1325

comment by: UK CAA

Page No: 134

Paragraph No: GM3-ADR-OPS.B.005

Comment: This guidance clashes with GM2-ADR-OPS.B.005 (c)(2) which establishes the command authority by agreement.

Justification: To state that the aerodrome operator is normally in command will be a direct clash with many state's emergency management guidance and rules that set the duty with the emergency services.

Proposed Text: "(a) In an on-airport accident/incident, **command will be as agreed by national requirements and local emergency planning arrangements.**"

response

Accepted

The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment

1479

comment by: Flughafen Graz Betriebs GmbH

(a) Chance to:
....aerodrome operator or local government

response

Accepted

The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this

	could be.
comment	<p>1527 comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i></p> <p>(a) Chance to: ...aerodrome operator or local government</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>1619 comment by: <i>Geneva International Airport (ROMIG)</i></p> <p>Insert after "aerodrome operator" "or local government" This allows compatibility with national law.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>1623 comment by: <i>Assaeroporti - Associazione Italiana Gestori Aeroporti</i></p> <p>(a): in order to make a reference to basic national law, ASSAEROPORTI suggests to modify the sentence as follows:</p> <p>"In an on-airport aircraft accident/incident the aerodrome operator or local government is normally in command"</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>1641 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i></p> <p>(a) change to: ...aerodrome operator or local government...</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a</p>

requirement to establish a command authority without specifying who this could be.

comment 1715 comment by: *London Luton Airport Operations Ltd*

(a) In an on-airport aircraft accident/incident the aerodrome operator is normally in command

this will normally be a police authority and if it involves a crime scene and /or loss of life it will not be the airport fire service, they will be initial responders and have a short period of command.

response Accepted

The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 1751 comment by: *Aéroport de Marseille - MRS/LFML*

It is appropriate to delete the points (a) and (b).
This is the local authority which is normally in command during emergencies. All depends on national and local rules about aid emergency organisation.
Moreover, in case of emergency we cannot have a global response led by the local authority.

response Accepted

The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 1813 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#163](#)

UAF	NPA	2011-20	(B.II)	GM3-ADR-OPS.B.005
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Référence: GM3-ADR-OPS.B.005
Command during emergencies

Traduction de courtoisie
It is appropriate to delete the points (a) and (b).
This is the local authority which is normally in command during emergencies. All depends on national and local rules about aid emergency organisation.
Moreover, in case of emergency we cannot have a global response led by

response	<p>the local authority.</p> <p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>1870 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #164</p> <p>ADBM - NPA 2011-20 (B.II) GM3-ADR-OPS.B.005</p> <p>Référence: GM3-ADR-OPS.B.005</p> <p>Command during emergencies</p> <p>Traduction de courtoisie</p> <p>It is appropriate to delete the points (a) and (b). This is the local authority which is normally in command during emergencies. All depends on national and local rules about aid emergency organisation.</p> <p>Moreover, in case of emergency we cannot have a global response led by the local authority.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>1900 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to delete the points (a) and (b). This is the local authority which is normally in command during emergencies. All depends on national and local rules about aid emergency organisation.</p> <p>Moreover, in case of emergency we cannot have a global response led by the local authority.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>1972 comment by: <i>Turin Airport - TRN/LIMF</i></p> <p>(a): in order to make a reference to basic national law, Turin</p>

	<p>Airport suggests to modify the sentence as follows:</p> <p>"In an on-airport aircraft accident/incident the aerodrome operator or local government is normally in command"</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>1998 comment by: <i>Munich Airport International</i></p> <p>(a)</p> <p>insert after "aerodrome operator" "or local government"</p> <p>Justification: basic national law</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>2037 comment by: <i>Shannon Airport</i></p> <p>Detailed guidance should be made available in relation to how national legislative provisions that give command and control to National Emergency Services, for example in Ireland of the National Framework for Major Emergency Management, will be dealt with and considered by competent authorities.</p> <p>Suggest addition of "or local government" after aerodrome operator in point (a) to resolve this issue as this is the case under Member States national law in a number of instances.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>2108 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>GM3-ADR-OPS.B005 (a) Command during emergencies is normally the aerodrome operator</p> <p>Disagree - in the UK the command is usually passed to the Cat 1 responder - normally the Police</p>

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 2192 comment by: *Flughafen Klagenfurt*
(a) Cange to:
... aerodrome operator or local government

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 2333 comment by: *Zürich Airport*
Delete due to the fact that in case of an accidents or incident the local authority, the Swiss AAIB and/or the competent authority is in command !

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 2339 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: GM3-ADR-OPS.B.005	Command during emergencies
Proposition/commentaire	Il convient de supprimer les points (a) et (b).
Justification	C'est l'autorité locale qui est normalement pilote en cas d'urgence. Tout dépend des règles nationales et locales relatives à l'organisation des secours. De plus, en cas d'urgence on ne peut avoir qu'une réponse globale gérée par l'autorité locale.
Traduction de courtoisie	It is appropriate to delete the points (a) and (b). This is the local authority which is normally in command during emergencies.

	<p>All depends on national and local rules about aid emergency organisation. Moreover, in case of emergency we cannot have a global response led by the local authority.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>2348 comment by: <i>Aberdeen Airport</i></p> <p>Consider changing paragraph (a) to read the same as paragraph (b), as some member state agreements set out that local authority services will take command when arriving at an incident/accident on as well as off airport.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>2367 comment by: <i>Norwich International Airport</i></p> <p>GM3-ADR-OPS.B.005 — Command during emergencies</p> <p>(a) In an on-airport aircraft accident/incident the aerodrome operator is normally in command</p> <p>Many member states set out that emergency services have command.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>2396 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(a) Local Authority emergency services have command.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has</p>

been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 2406 comment by: *East Midlands Airport - EMA/EGNX*
(c) When an aircraft accident/incident occurs just outside the aerodrome perimeter,
Comment: Need more definition i.e. what distance is included within "just outside the perimeter"

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 2407 comment by: *East Midlands Airport - EMA/EGNX*
(a). In an on-airport aircraft accident/incident the aerodrome operator is normally in command;
Comment: This is contradictory to the Civil Contingencies Act and Incident Command System in the UK

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 2467 comment by: *Isavia*
This text is not reflecting many countries national legislation concerning command and jurisdiction in the event of an aircraft emergency. This text could be referred to as an example on how things might be organized

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 2481 comment by: *DAA Cork Airport*
Detailed guidance should be made available in relation to how national legislative provisions that give command and control to National Emergency Services, for example in Ireland of the National Framework for Major Emergency Management, will be dealt with and considered by

	<p>competent authorities.</p> <p>Suggest addition of "or local government" after aerodrome operator in point (a) to resolve this issue as this is the case under Member States national law in a number of instances.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>2565 comment by: <i>ADV -German Airports Association</i></p> <p>GM3.ADR.OPS.B.005 (a) insert after "aerodrome operator" "or local government"</p> <p>Justification basic national law</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>2587 comment by: <i>EAL AFS - Edinburgh Airport</i></p> <p>GM3-ADR-OPS.B.005-Command during emergencies</p> <p>(a) In an on-airport incident many member states set out that the Emergency Services have command.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.</p>
comment	<p>2602 comment by: <i>Stansted Airport - Daren BARTHAM</i></p> <p>GM3-ADR-OPS.B.005 — Command during emergencies</p> <p>(a) In an on-airport aircraft accident/incident the aerodrome operator is normally in command Many member states set out that emergency services have command.</p>
response	<p>Accepted</p> <p>The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has</p>

been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 2664 comment by: *Fraport AG*
GM3-ADR-OPS.B.005 — Command during emergencies (a)
Editorial
In an on-airport aircraft accident/incident the **aerodrome operator** is normally in command;
Proposed Text
In an on-airport aircraft accident/incident the **aerodrome operator or local government** is normally in command;
Fraport AG
basic national law

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

comment 2665 comment by: *Fraport AG*
GM3-ADR-OPS.B.005 — Command during emergencies (b)
Editorial
In an off-airport aircraft accident/incident, the agency in command will be the agency agreed upon in the mutual aid emergency agreement between the **aerodrome operator** and the surrounding community.
Proposed Text
In an off-airport aircraft accident/incident, the agency in command will be the agency agreed upon in the mutual aid emergency agreement between the **aerodrome operator or local government** and the surrounding community.
Fraport AG
basic national law

response Accepted
The Agency doesn't intend to interfere with national regulations or arrangements concerning the command during emergencies. This GM has been deleted. In point (c), (2) in GM2-ADR.OPS.B.005, there is a requirement to establish a command authority without specifying who this could be.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – GM4-ADR-OPS.B.005 – Aerodrome
Emergency Plan Document** p. 135

comment	203	comment by: BAA
	The emergency plan should detail the RFFS off-airport response	
response	Accepted New point (b) (7) has been added in the text addressing the RFFS off-airport response.	
comment	566	comment by: Vienna International Airport
	(a)(1) define vicinity	
response	Noted The term 'vicinity' has been replaced by the term 'surroundings' in accordance with the provisions of the Basic Regulation. Refer to GM1-ADR.OPS.B.005 for the definition of surroundings for emergency planning purposes.	
comment	762	comment by: Flughafen Düsseldorf GmbH
	a) 2) Welche Infrastruktur ist hier gemeint? Feuerwehrgebäude und Equipment? Zur besseren Verständlichkeit sollte hier eine beispielhafte Aufzählung erfolgen!	
response	Accepted (a) (2) has been revised to include some examples.	
comment	918 ❖	comment by: DGAC Direction Générale de l'aviation civile
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none">• ANNEX III – Part-OPS – ADR.OPS.B.005 – Aerodrome emergency planning (p65)• AMC/GM to ANNEX III – Part-OPS – AMC2-ADR-OPS.B.005 – Aerodrome Emergency Plan Document (p133)• AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise (p133)• All the corresponding GM (from GM1 to GM12)	
	<u>2. Justification and proposed text / comment</u>	
	· This comment is linked with comment 1202 in book I. Implementing rule The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the	

responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 – Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;

(1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;

(2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;

(3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."

· Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;

and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; (we have to check with R1 responses to SL)."

· Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response Noted

comment	1179	comment by: <i>Salzburger Flughafen GmbH</i>
	(a)(1) define vicinity	
response	Noted	
	The term 'vicinity' has been replaced by the term 'surroundings' in accordance with the provisions of the Basic Regulation. Refer to GM1-ADR.OPS.B.005 for the definition of surroundings for emergency planning purposes.	
comment	1326	comment by: <i>UK CAA</i>
	Page No: 135	
	Paragraph No: GM4-ADR-OPS.B.005	
	Comment: The off-aerodrome RFFS response area should be set out in the emergency plan.	
	Justification: For completeness the response area of the RFFS off the aerodrome should be set out in the emergency plan to ensure that all responding agencies are clear in their expectations.	
	Proposed Text: Add Item (7) "details of the off aerodrome areas for which the RFFS will provide a response and the size and nature of the response."	
response	Accepted	
	The proposal has been added as (b) (7) in the text.	
comment	1480	comment by: <i>Flughafen Graz Betriebs GmbH</i>
	(a)(1) define vicinity	
response	<i>Accepted</i>	
	The term 'vicinity' has been replaced by the term 'surroundings' in accordance with the provisions of the Basic Regulation. Refer to GM1-ADR.OPS.B.005 for the definition of surroundings for emergency planning purposes.	
comment	1529	comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i>
	(a)(1) define vicinity	
response	Accepted	
	The term 'vicinity' has been replaced by the term 'surroundings' in accordance with the provisions of the Basic Regulation. Refer to GM1-ADR.OPS.B.005 for the definition of surroundings for emergency planning purposes.	
comment	1642	comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i>

(a)(1) define vicinity

response Accepted

The term 'vicinity' has been replaced by the term 'surroundings' in accordance with the provisions of the Basic Regulation. Refer to GM1-ADR.OPS.B.005 for the definition of surroundings for emergency planning purposes.

comment 2193 comment by: *Flughafen Klagenfurt*

(a)(1) define vicinity

response Accepted

The term 'vicinity' has been replaced by the term 'surroundings' in accordance with the provisions of the Basic Regulation. Refer to GM1-ADR.OPS.B.005 for the definition of surroundings for emergency planning purposes.

comment 2321 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence: AMC1-ADR.OPS.B005	Aerodrome Emergency Planning
Proposition/commentaire	(a) Il convient de transférer ces dispositions en GM.
Justification	Les principes des facteurs humains pour le SSLIA sont encore trop flous pour pouvoir être mis en AMC.
Traduction de courtoisie	It is appropriate to transfer the (a) to GM. The human factors principles for emergency operations are still too vague to be put in AMC.

response Accepted

Comment accepted. The provision has been moved to GM3 - ADR.OPS.B.005 Aerodrome Emergency Plan Document.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM5-ADR-OPS.B.005 – Contents of an Aerodrome Emergency Plan Document p. 135-140

comment 204 comment by: *BAA*

Airfield operations Department telephone numbers should be part of this list.

response Accepted
Text revised to include airfield operations department.

comment	718	comment by: <i>ADP : Aeroports de Paris</i>
	Référence: GM5-ADR-OPS.B005	Contents of an Aerodrome Emergency Plan Document Section 6 – Sabotage including bomb threat (aircraft or structure)
	Proposition/commentaire	Il convient de supprimer la Section 6.
	Justification	Cette section concerne la sûreté qui ne relève pas de la compétence de l'AESA.
	Traduction de courtoisie	It is appropriate to delete the Section 6. This section is about security which does not fall within the competence of the EASA.

response Partially accepted
Although sabotage including bomb threat is considered as security incident, it has also safety implications. The proposed structure is based on ICAO Doc.9137 Part 7.

comment 765 comment by: *Flughafen Düsseldorf GmbH*
Zu Section 8) Das hier aufgeführte Beispiel von "fuel spills" hat nichts in einem Notfallplan zu suchen, da nicht automatisch ein Notfall bei Eintreten entsteht.

response Not accepted
Fuel spills, depending on their size and location, could become very serious, and threaten aircraft, installations, and people.

comment 918 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX III — Part-OPS — ADR.OPS.B.005 — Aerodrome emergency planning (p65)
- AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document (p133)
- AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise (p133)
- All the corresponding GM (from GM1 to GM12)

2. Justification and proposed text / comment

- This comment is linked with comment 1202 in book I.
Implementing rule
The word "vicinity" is used instead of "surroundings" which is not

consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 – Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

- (1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;*
- (1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;*
- (2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;*
- (3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."*

· Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

- (a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and*
 - (b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;*
- and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~"*

· Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response Noted

comment 933 comment by: *Union des Aéroports français - UAF*
Attachment [#165](#)
UAF NPA 2011-20 (B.II) GM5-ADR-OPS.B005
Référence: GM5-ADR-OPS.B005
Contents of an Aerodrome Emergency Plan Document
Section 6 – Sabotage including bomb threat (aircraft or structure)
Traduction de courtoisie
It is appropriate to delete the Section 6.
This section is about security which does not fall within the competence of the EASA.

response Partially accepted
Although sabotage including bomb threat is considered as security incident, it has also safety implications. The proposed structure is based on ICAO Doc.9137 Part 7.

comment 1327 comment by: *UK CAA*
Page No: 135
Paragraph No: GM5-ADR-OPS.B.005 Sections 1-7
Comment: The "Airside Operations Unit" is an essential component of the emergency response and should be included in these notification lists.
Justification: It is essential that the airside operations unit is included in the list of essential numbers. They play a key role in incidents, for example securing the site and escorting local authority emergency services to the scene.
Proposed Text: Add "Airside Operations Unit" to each of sections 1-7 as one of the first notifications.

response Accepted
The Agency considers that normally the airside operations unit belongs to the aerodrome operator. However, the airfield operations department, due to its importance, has been included in the notification list.

comment 1338 comment by: *Euroairport Bâle-Mulhouse*
Attachment [#166](#)
Aéroport Bâle – Mulhouse NPA 2011-20 (B.II)GM5-ADR-OPS.B.005
Référence: GM5-ADR-OPS.B005
Contents of an Aerodrome Emergency Plan Document
Section 6 – Sabotage including bomb threat (aircraft or structure)

	<p>Traduction de courtoisie It is appropriate to delete the Section 6. This section is about security which does not fall within the competence of the EASA.</p>
response	<p>Partially accepted</p> <p>Although sabotage including bomb threat is considered as security incident, it has also safety implications. The proposed structure is based on ICAO Doc.9137 Part 7.</p>
comment	<p>1458 comment by: <i>Swedish Transport Agency</i></p> <p>Replace airport control tower and airport flight information service with air traffic services unit. This might be applicable also elsewhere.</p>
response	<p>Accepted</p> <p>Text revised.</p>
comment	<p>1755 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>It is appropriate to delete the Section 6. This section is about security which does not fall within the competence of the EASA.</p>
response	<p>Partially accepted</p> <p>Although sabotage including bomb threat is considered as security incident, it has also safety implications. The proposed structure is based on ICAO Doc.9137 Part 7.</p>
comment	<p>1814 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #167</p> <p>UAF NPA 2011-20 (B.II) GM5-ADR-OPS.B005</p> <p>Référence: GM5-ADR-OPS.B005 Contents of an Aerodrome Emergency Plan Document Section 6 – Sabotage including bomb threat (aircraft or structure)</p> <p>Traduction de courtoisie It is appropriate to delete the Section 6. This section is about security which does not fall within the competence of the EASA.</p>
response	<p>Partially accepted</p> <p>Although sabotage including bomb threat is considered as security incident, it has also safety implications. The proposed structure is based on ICAO Doc.9137 Part 7.</p>
comment	<p>1981 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p>

It is appropriate to delete the Section 6 but also to siez requirements in staff and equipment besides the size of aerodromes.
This section is about security which does not fall within the competence of the EASA.

response Partially accepted

Although sabotage including bomb threat is considered as security incident, it has also safety implications. The proposed structure is based on ICAO Doc.9137 Part 7.

comment 2340 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

<u>Référence: GM5-ADR-OPS.B005</u>	Contents of an Aerodrome Emergency Plan Document Section 6 – Sabotage including bomb threat (aircraft or structure)
Proposition/commentaire	Il convient de supprimer la Section 6.
Justification	Cette section concerne la sûreté qui ne relève pas de la compétence de l'AESA.
Traduction de courtoisie	It is appropriate to delete the Section 6. This section is about security which does not fall within the competence of the EASA.

response Partially accepted

Although sabotage including bomb threat is considered as security incident, it has also safety implications. The proposed structure is based on ICAO Doc.9137 Part 7.

comment 2402 comment by: *East Midlands Airport - EMA/EGNX*

Section 9 - the on scene commander will be designated as required from within the pre-arranged mutual aid emergency agreement.

Comment: This contradicts the earlier statement on page 134 (GM3-ADR-OPS.B.005) which says that the Aerodrome will be in command.

response Accepted

GM3-ADR.OPS.B.005 has been deleted to allow for more flexibility.

comment 2403 comment by: *East Midlands Airport - EMA/EGNX*

Section 4 – Malfunction of aircraft in flight (full emergency or local standby).

Comment: These cannot be combined as they both have very different responses i.e. one requires external emergency services and one does not

response Noted

The Agency agrees that full emergency and local standby have very different responses. However, they both fall under the malfunction of aircraft in flight category. It is up to the aerodrome operator to define the responses to such incidents.

comment 2404 comment by: *East Midlands Airport - EMA/EGNX*

Section 3 - Aircraft accident off the airport.

Comment: Does not define what distance "off the airport" is considered to be ?

response Noted

The aerodrome emergency plan should normally cover an area of approximately 5 nm from the centre of the aerodrome (new point (b) in GM1-ADR.OPS.B.005)

comment 2405 comment by: *East Midlands Airport - EMA/EGNX*

Various sections: Text "Action by"

Comment: A number of these agencies are not relevant in the UK. For others, such as hospitals etc, the aerodrome would not include their actions in the emergency orders.

response Noted

The terms used are mainly coming from ICAO documents and are generic. It is expected that different terms apply in each country. However, the aerodrome operator should adapt these terms to the terminology used in this country.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – GM6-ADR-OPS.B.005 – Types of
Emergencies** p. 140

comment 205 comment by: *BAA*

Please add "Aircraft Ground Incident" to this list

response Accepted

New point (a) (2) has been added.

comment 279 comment by: *Manchester Airport plc*

(b) (1) Consider adding "Aircraft Ground Incident".

response Accepted

	New point (a) (2) has been added.
comment	322 comment by: <i>Belfast International Airport - BFS/EGAA</i> We suggest that aircraft ground incident is included as a emergency type.
response	Accepted New point (a) (2) has been added.
comment	607 comment by: <i>BAA Glasgow</i> (B) (1) There should be consideration to include a further category termed "Aircraft Ground Incident" Where an aircraft on the ground is known to have an emergency situation other than an accident, requiring the attendance of emergency services.
response	Accepted New point (a) (2) has been added.
comment	808 comment by: <i>Dublin Airport Authority</i> Ref- (a) Consider adding: "Aircraft Ground Incident".
response	Accepted New point (a) (2) has been added.
comment	918 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i> <u>1. Affected paragraphs</u> <ul style="list-style-type: none">• ANNEX III — Part-OPS — ADR.OPS.B.005 — Aerodrome emergency planning (p65)• AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document (p133)• AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise (p133)• All the corresponding GM (from GM1 to GM12) <u>2. Justification and proposed text / comment</u> <ul style="list-style-type: none">• This comment is linked with comment 1202 in book I. Implementing rule The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 – Aerodrome emergency planning

“Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;

(1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;

(2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;

(3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness.”

· Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word “vicinity” at the end should be replaced by “surroundings”.

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative (“préfet”). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

“The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;

and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~”

· Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response *Noted*

comment

1328

comment by: UK CAA

Page No: 140

Paragraph No: GM6-ADR-OPS.B.005 (b)

	<p>Comment: There are many incidents on the ground which should be covered by this guidance.</p> <p>Justification: The list is too restrictive. There are many incidents involving aircraft on the ground, for example during fuelling, that are not covered by this list and should be included. The UK experience is that there are more incidents on the ground than other types.</p> <p>Proposed Text: Add item: "(b)(4) Aircraft Ground Incident: where an aircraft on the ground is known to have an emergency situation other than an accident, requiring the attendance of the emergency services."</p>
response	<p>Accepted</p> <p>New point (a) (2) has been added.</p>
comment	<p>1716 comment by: <i>London Luton Airport Operations Ltd</i></p> <p>at (b) there is no "ground incident"</p>
response	<p>Accepted</p> <p>New point (a) (2) has been added.</p>
comment	<p>2038 comment by: <i>Shannon Airport</i></p> <p>Consider adding: "Aircraft Ground Incident".</p>
response	<p>Accepted</p> <p>New point (a) (2) has been added.</p>
comment	<p>2109 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>GM6-ADR-OPS.B005 (b) - Types of emergency. -consider adding Aircraft Ground Incident</p>
response	<p>Accepted</p> <p>New point (a) (2) has been added.</p>
comment	<p>2214 comment by: <i>Glasgow Prestwick</i></p> <p>consider adding aircraft ground incident</p>
response	<p>Accepted</p> <p>New point (a) (2) has been added.</p>
comment	<p>2369 comment by: <i>Norwich International Airport</i></p> <p>GM6-ADR-OPS.B.005 — Types of Emergencies</p> <p>(1) 'aircraft accident': an aircraft accident which has occurred on or in the</p>

	vicinity of the airport; Consider adding "Aircraft Ground Incident"
response	Accepted New point (a) (2) has been added.
comment	2397 comment by: <i>East Midlands Airport - EMA/EGNX</i> (b)(1) Aircraft Ground Incident and aircraft accident imminent have been missed.
response	Accepted New point (a) (2) has been added.
comment	2398 comment by: <i>East Midlands Airport - EMA/EGNX</i> (b) Definition of aircraft emergencies Justification: Contradicts earlier section 4 - where it is called "malfunction of aircraft in flight"
response	Noted
comment	2413 comment by: <i>Aberdeen Airport</i> Under point (b), consider inclusion of "aircraft ground incident" as an emergency type needing a response.
response	Accepted New point (a) (2) has been added.
comment	2443 comment by: <i>London Biggin Hill Airport</i> GM6.ADR-OPS.B.005 (b)(1) reword "aircraft accident" to read "Aircraft accident or Aircraft ground incident"
response	Noted The term 'aircraft ground incident' has been added as (a) (2)
comment	2484 comment by: <i>DAA Cork Airport</i> Consider adding: "Aircraft Ground Incident".
response	Accepted New point (a) (2) has been added.
comment	2589 comment by: <i>EAL AFS - Edinburgh Airport</i> M6-ADR-OPS.B005-Types of Emergencies

response	Consider adding "Aircraft Ground Incident" and "Local Standby Ground".
response	Accepted New point (a) (2) has been added.
comment	2603 comment by: <i>Stansted Airport - Daren BARTHAM</i> GM6-ADR-OPS.B.005 — Types of Emergencies (1) 'aircraft accident': an aircraft accident which has occurred on or in the vicinity of the airport; Consider adding "Aircraft Ground Incident"
response	Accepted New point (a) (2) has been added.

NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS — SUBPART B — AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) — GM7-ADR-OPS.B.005 — Involved Agencies in Emergencies	p. 140-141
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comment	918 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i> <u>1. Affected paragraphs</u> <ul style="list-style-type: none">• ANNEX III — Part-OPS — ADR.OPS.B.005 — Aerodrome emergency planning (p65)• AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document (p133)• AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise (p133)• All the corresponding GM (from GM1 to GM12) <u>2. Justification and proposed text / comment</u> <ul style="list-style-type: none">• This comment is linked with comment 1202 in book I. Implementing rule The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3: ADR.OPS.B.005 — Aerodrome emergency planning <i>"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:</i> <i>(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;</i> <i>(1bis) defines the tasks and responsibilities of the aerodrome operator</i>
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relating to an emergency;
 (2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity *surroundings;*
 (3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."

- Acceptable means of compliance
 AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "*surroundings*".
 AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise
~~"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:~~
 (a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and
 (b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;
 and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~"

- Guidance materials
 The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response | Noted

comment | 2399 | comment by: *East Midlands Airport - EMA/EGNX*
 (a) The following agencies should participate in response to an emergency
 Change "should" to "could" as not all are relevant at all aerodromes

response | Accepted
 Text revised accordingly and the word 'should' has been replaced with 'could'.

comment | 2468 | comment by: *Isavia*

We suggest to make this a more generic text. Example off agencies that might have an important role in emergencies. For example: in many countries aircraft operators will have a role also in an Off aerodrome emergency. Several countries do not have Military forces and some rely heavily on other agencies such as voluntaries. See also Isavia comment: NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC1-ADR-OPS.B.005 – GM12-ADR-OPS.B.005

response

Accepted

Text has been revised in order to allow more flexibility.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM8-ADR-OPS.B.005 – Emergency Operations Centre

p. 141

comment

30

comment by: *ACI EUROPE - Airports Council International*

(a) & (b) add "one or more" before "emergency operations center"

response

Accepted

Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.

comment

206

comment by: *BAA*

(g) Does this mean that staff will need to be present in the emergency operations centre at all times?

response

Accepted

The presence of the emergency operations centre's staff is not required at all times. Point (g) has been revised to include the establishment of a procedure for notifying its staff.

comment

324

comment by: *CAA Austria - Ministry of Transport*

(b) Add one or more before emergency operations center
Multiple emergency ops centers can exist on large aerodromes

response

Accepted

Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.

comment

325

comment by: *Belfast International Airport - BFS/EGAA*

Clear explanation required of the difference between Emergency Operation Centre and Mobile Command Post as read in conjunction with this

response	<p>document especially (c) (d) and (e). It is unclear as to who this paragraph is directed at Emergency Services or Airport.</p> <p>Noted</p> <p>The purpose of these two GM is to provide information on the operation of the emergency operations centre and the mobile command post. The responsibility of establishing these control positions depends on local arrangements. In many cases, this is done by the aerodrome operator, but it could not be excluded the possibility of another entity to establish them.</p>
comment	<p>360 comment by: <i>Avinor</i></p> <p>GM8.ADR.OPS.B.005 (a) (b) Add "one or more" before "emergency operations center".</p>
response	<p>Accepted</p> <p>Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.</p>
comment	<p>553 comment by: <i>Flughafen Düsseldorf GmbH</i></p> <p>a) und b) es könnten auch mehrere "emergency operations centre" sein.</p>
response	<p>Accepted</p> <p>Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.</p>
comment	<p>567 comment by: <i>Vienna International Airport</i></p> <p>(b) Add "one or more" before emergency operations center</p>
response	<p>Accepted</p> <p>Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.</p>
comment	<p>918 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• ANNEX III — Part-OPS — ADR.OPS.B.005 — Aerodrome emergency planning (p65)• AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document (p133)• AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise (p133)• All the corresponding GM (from GM1 to GM12) <p><u>2. Justification and proposed text / comment</u></p> <ul style="list-style-type: none">• This comment is linked with comment 1202 in book I. Implementing rule

The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 – Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;

(1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;

(2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;

(3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."

- Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

"The aerodrome operator should ~~ensure that~~ participate within the limits of its tasks and responsibilities to the tests of the emergency plan ~~is tested by conducting~~ which should include:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;

and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~"

- Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the

response	formal group in charge of drafting these rules.
response	Noted
comment	921 comment by: <i>Cologne/Bonn Airport</i> (a) (b): add "one or more" before emergency operations center
response	Accepted Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.
comment	1180 comment by: <i>Salzburger Flughafen GmbH</i> (b) Add "one or more" before emergency operations center
response	Accepted Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.
comment	1329 comment by: <i>UK CAA</i> Page No: 141 Paragraph No: GM8-ADR-OPS.B.005 (g) Comment: Item (g) could be read to require a 24 hour operation. Justification: To clarify that the centre need only be open during the hours of operation. Proposed Text: Add at the end of (g) "..or during the aerodrome's hours of operation."
response	Accepted Text revised as proposed.
comment	1482 comment by: <i>Flughafen Graz Betriebs GmbH</i> (b) Add "one or more" before emergency operations center
response	Accepted Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.
comment	1533 comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i> (b) Add "one or more" before emergency operations center

response	Accepted Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.
comment	1620 comment by: <i>Geneva International Airport (ROMIG)</i> Add "one or more" before "emergency operations center" Multiple emergency ops centers can exist on large aerodromes.
response	Accepted Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.
comment	1645 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i> (b) add "one or more" before emergency operations center
response	Accepted Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.
comment	1999 comment by: <i>Munich Airport International</i> (a)(b) add "one or more" before "emergency operations center"
response	Accepted Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.
comment	2028 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i> change to "one or more emergency operations centers"
response	Accepted Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.
comment	2029 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i> change to "aerodrome operator or local government"
response	Accepted

Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.

comment 2194 comment by: *Flughafen Klagenfurt*
(b) Add "one or more" before emergency operations center

response Accepted
Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.

comment 2566 comment by: *ADV -German Airports Association*
GM8.ADR.OPS.B.005 (a) (b)
add "one or more" before "emergency operations center"

response Accepted
Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.

comment 2666 comment by: *Fraport AG*
GM8-ADR-OPS.B.005 — Emergency Operations Centre (a)
Editorial
An emergency operations centre and a command post could be available for use during an emergency;
Proposed Text
One or more emergency operations centre and a command post could be available for use during an emergency;
Fraport AG
Depending on the size on the operation of an aerodrome

response Accepted
Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.

comment 2667 comment by: *Fraport AG*
GM8-ADR-OPS.B.005 — Emergency Operations Centre (b)
Editorial
The emergency operations centre may be a part of the aerodrome facilities and responsible for the overall coordination and general direction of the response to an emergency;

	<p>Proposed Text</p> <p>The one or more emergency operations centre(s) may be a part of the aerodrome facilities and responsible for the overall coordination and general direction of the response to an emergency;</p>	
	<p>Fraport</p> <p>Depending on the size on the operation of an aerodrome</p>	AG
response	<p>Accepted</p> <p>Text revised accordingly, with the condition that in the aerodrome emergency plan, it should be identified which emergency operations centre has the overall responsibility for coordination.</p>	

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM9-ADR-OPS.B.005 – Mobile Command Post</p>	p. 142
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comment	608	comment by: <i>BAA Glasgow</i>
	(A) Consider checking communication devices daily rather than monthly.	
response	<p>Noted</p> <p>Text has been revised to require the regular testing of communication and electronic devices. It is expected that the entity responsible for the mobile command post should have a schedule for regular inspections.</p>	

comment	918 ❖	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none"> • ANNEX III – Part-OPS – ADR.OPS.B.005 – Aerodrome emergency planning (p65) • AMC/GM to ANNEX III – Part-OPS – AMC2-ADR-OPS.B.005 – Aerodrome Emergency Plan Document (p133) • AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise (p133) • All the corresponding GM (from GM1 to GM12) 	
	<p><u>2. Justification and proposed text / comment</u></p> <ul style="list-style-type: none"> • This comment is linked with comment 1202 in book I. Implementing rule <p>The word “<i>vicinity</i>” is used instead of “<i>surroundings</i>” which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative’s responsibility (“<i>préfet</i>”). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:</p>	

ADR.OPS.B.005 – Aerodrome emergency planning

“Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;

(1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;

(2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;

(3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness.”

- Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word “vicinity” at the end should be replaced by “surroundings”.

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative (“préfet”). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

“The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;

and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; ~~(we have to check with R1 responses to SL).~~”

- Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response Noted

comment 2400 comment by: East Midlands Airport - EMA/EGNX
Reinstate reference that this facility can be provided by the emergency services as per CAP 168.

response Noted

The GM provides information concerning the purpose and the equipment required for the Mobile Command Post. However, the provision of this facility could depend on local arrangements.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – GM10-ADR-OPS.B.005 –
Communication System**

p. 142

comment

918 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX III – Part-OPS – ADR.OPS.B.005 – Aerodrome emergency planning (p65)
- AMC/GM to ANNEX III – Part-OPS – AMC2-ADR-OPS.B.005 – Aerodrome Emergency Plan Document (p133)
- AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise (p133)
- All the corresponding GM (from GM1 to GM12)

2. Justification and proposed text / comment

- This comment is linked with comment 1202 in book I.
Implementing rule

The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 – Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

- (1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;*
- (1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;*
- (2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;*
- (3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."*

- Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including

aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

- (a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and*
- (b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected; and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; (we have to check with R1 responses to SL)."*

· Guidance materials

The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.

response

Noted

comment

1459

comment by: *Swedish Transport Agency*

Replace Air traffic control tower and flight service station with air traffic services unit. This might be applicable also elsewhere.

response

Accepted

Text revised accordingly.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM11-ADR-OPS.B.005 – Emergencies in difficult environments p. 143

comment

918 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX III – Part-OPS – ADR.OPS.B.005 – Aerodrome emergency planning (p65)
- AMC/GM to ANNEX III – Part-OPS – AMC2-ADR-OPS.B.005 – Aerodrome Emergency Plan Document (p133)
- AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise (p133)

- All the corresponding GM (from GM1 to GM12)

2. Justification and proposed text / comment

- This comment is linked with comment 1202 in book I.

Implementing rule

The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 – Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

- (1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;*
- (1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;*
- (2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;*
- (3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."*

- Acceptable means of compliance

AMC2 –ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 – Aerodrome emergency exercise

"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

- (a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and*
 - (b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;*
- and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; (we have to check with R1 responses to SL)."*

	<ul style="list-style-type: none"> Guidance materials <p>The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.</p>
response	Noted
comment	<p>2401 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>Inclusion of the 1000m assessment is required</p> <p>Recommend including details as per CAA CAP168</p>
response	<p>Accepted</p> <p>This has been included in AMC1-ADR.OPS.B.005.</p>

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM12-ADR-OPS.B.005 – Emergency Exercises p. 143

comment	<p>207 comment by: <i>BAA</i></p> <p>(a)(4) Exercises must ensure that all scenarios can be tested and not just "various" scenarios.</p>
response	<p>Partially accepted</p> <p>The Agency agrees that the term 'various' is not the most appropriate. However, it is very difficult to test all the scenarios. For that reason, text has been revised to include different scenarios described in the aerodrome emergency plan.</p>
comment	<p>265 comment by: <i>CAA Norway</i></p> <p>GM12-ADR-OPS.B005, (c)(1) on page 143: Tabletop exercises every six months is not obtainable for many aerodromes! We suggest to change the advice of this GM.</p>
response	<p>Accepted</p> <p>Text has been revised to focus on the scope of the tabletop exercises.</p>
comment	<p>280 comment by: <i>Manchester Airport plc</i></p> <p>(c) (1) Is 6 months too onerous?</p>
response	<p>Accepted</p> <p>Text has been revised to focus on the scope of the tabletop exercises.</p>

comment	323	comment by: <i>CAA Austria - Ministry of Transport</i>
	(c)(1) table top exercises may held every six month... due to the fact that every two years a full scale exercise and in the intervening year a partial emergency exercise must done, the partial exercise could be accepted as a tabletop exercise. Para c can be deleted.	
response	Partially accepted Text has been revised to focus on the scope of the tabletop exercises.	
comment	502	comment by: <i>Icelandic Civil Aviation Administration</i>
	GM12-ADR-OPS.B005, (c)(1) on page 143: Tabletop exercises every six months is not obtainable for many aerodromes! We suggest to change the advice of this GM to yearly.	
response	<i>Partially accepted</i> Text has been revised to focus on the scope of the tabletop exercises.	
comment	525	comment by: <i>CTIF The International Fire and Rescue Organization - Airport Commission</i>
	As soon as convenient after the exercise is OK. (not later than seven days) have to be deleted.	
response	Noted	
comment	568	comment by: <i>Vienna International Airport</i>
	Cross check with ICAO State Letter 41	
response	Accepted The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.	
comment	609	comment by: <i>BAA Glasgow</i>
	(4) Consider changing wording from -: The exercise may be held either during the day or at night on the airport; to -: The exercise must be held alternately day and night on the airport;	
response	Noted	
comment	610	comment by: <i>BAA Glasgow</i>
	(C) (1) The 6 month frequency for table tops is too frequent, consider annually.	
response	Accepted	

Text has been revised to focus on the scope of the tabletop exercises.

comment

720

comment by: *ADP : Aeroports de Paris*

Référence: GM12-ADR-OPS.B005	Emergency Exercises
Proposition/commentaire	Il convient de reprendre la Lettre aux Etats n°41 de l'OACI qui introduit d'autres types d'exercice (les essais modulaires). (cf. commentaire sur l'AMC3-ADR-OPS.B.005)
Justification	
Traduction de courtoisie	It is appropriate to take up the ICAO State Letter 41 that introduces other types of exercises (modular tests). (cf. comment about AMC3-ADR-OPS.B.005)

response

Noted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment

811

comment by: *Dublin Airport Authority*

Ref (c)-(1)

A requirement to hold a tabletop exercise every six months is too resource intensive from both a time and cost perspective.

response

Accepted

Text has been revised to focus on the scope of the tabletop exercises.

comment

848

comment by: *Finnish Transport Safety Agency*

GM12-ADR-OPS.B005, (c)(1) on page 143: Tabletop exercises every six months is not obtainable for many aerodromes! We suggest to change the advice of this GM to yearly.

response

Accepted

Text has been revised to focus on the scope of the tabletop exercises.

comment

918 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX III — Part-OPS — ADR.OPS.B.005 — Aerodrome emergency planning (p65)
- AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.005 — Aerodrome Emergency Plan Document (p133)

- AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise (p133)
- All the corresponding GM (from GM1 to GM12)

2. Justification and proposed text / comment

- This comment is linked with comment 1202 in book I.
Implementing rule

The word "vicinity" is used instead of "surroundings" which is not consistent with the terminology used in the essential requirement B 1 (i). ADR.OPS.B.005 should also allow specifying the limits of the responsibilities of the aerodrome operator as in some States the establishment and the management of the emergency plan are not the responsibility of the aerodrome operator: in France it is the local State representative's responsibility ("préfet"). In that case the aerodrome operator cannot be responsible of the periodic testing of the emergency plan. Hence some proposed changes to the IR and AMC3:

ADR.OPS.B.005 — Aerodrome emergency planning

"Without prejudice to the system and legal provisions of the relevant Member State, the aerodrome operator shall establish an aerodrome emergency plan that:

(1) is commensurate with the aircraft operations and other activities conducted at the aerodrome or in its vicinity surroundings;

(1bis) defines the tasks and responsibilities of the aerodrome operator relating to an emergency;

(2) provides for the coordination of all appropriate agencies in response to an emergency occurring at an aerodrome or in its vicinity surroundings;

(3) contains procedures for periodic testing of the adequacy of the plan and for reviewing the results in order to improve its effectiveness."

- Acceptable means of compliance

AMC2 -ADR-OPS.B.005 introduces the notion of aerodrome Emergency Plan Document which may be worth. In (a) (5) the word "vicinity" at the end should be replaced by "surroundings".

AMC3-ADR-OPS.B.005 has been revised from the provision proposed by the group ADR002 (ADR.002-OPS.715, 2) to align the text with the current provisions of Annex 14 volume 1 and not the ones including aerodrome emergency plan modular testing proposed by the State Letter 11/041 since the Commission has rejected this proposed amendment. But, in France, it is not the responsibility of the aerodrome operator to conduct full scale aerodrome emergency exercise, but the responsibility of the local State representative ("préfet"). In order to take into account the limited responsibility of the aerodrome operator, the AMC3 should be amended as follows:

AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise

"The aerodrome operator should ensure that participate within the limits of its tasks and responsibilities to the tests of the emergency plan is tested by conducting which should include:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and

(b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected;

and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency; (we have to check with R1 responses to SL)."

	<p>· Guidance materials The corresponding guidance materials seem overspecifying at this stage and mixes aerodrome emergency plan and RFF provisions. They should be deleted, at least GM3 and GM5 to GM12, because they are not sufficiently mature for European application. Moreover, they were not produced by the formal group in charge of drafting these rules.</p>
response	Noted
comment	<p>934 comment by: <i>Union des Aéroports français - UAF</i> Attachment #168</p> <p>UAF NPA 2011-20 (B.II) GM12-ADR-OPS.B005</p> <p>Référence: GM12-ADR-OPS.B005 Emergency Exercises</p> <p>Traduction de courtoisie It is appropriate to take up the ICAO State Letter 41 that introduces other types of exercices (modular tests). (cf. comment about AMC3-ADR-OPS.B.005)</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1181 comment by: <i>Salzburger Flughafen GmbH</i> Cross check with ICAO state Letter 41</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1201 comment by: <i>Federal Office of Civil Aviation FOCA</i> "Table top exercises may be held every six months..." Due to the fact that every two years a full scale exercise and in the intervening year a partial emergency exercise must be done, the partial exercise could be accepted as a tabletop exercise. Para c) can be deleted.</p>
response	<p>Partially accepted</p> <p>Text has been revised to focus on the scope of the tabletop exercises.</p>
comment	<p>1330 comment by: <i>UK CAA</i> Page No: 143 Paragraph No: GM12-ADR-OPS.B.005 (a)(4)</p>

	<p>Comment: Exercises should test all scenarios.</p> <p>Justification: To be effective, exercises must replicate real life situations.</p> <p>Proposed Text: Replace "...on the airport" with "...and at different times of year when seasonal changes may present additional challenges. Exercises may take place both on or near the airport to test all scenarios"</p>
response	<p>Accepted</p> <p>The comment refers to (a) (5) and is agreed. Text revised accordingly.</p>
comment	<p>1339 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #169</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II)GM12-ADR-OPS.B005</p> <p>Référence: GM12-ADR-OPS.B.005 Emergency Exercises</p> <p>Traduction de courtoisie It is appropriate to take up the ICAO State Letter 41 that introduces other types of exercises (modular tests). (cf. comment about AMC3-ADR-OPS.B.005)</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1484 comment by: <i>Flughafen Graz Betriebs GmbH</i></p> <p>Cross check with ICAO State Letter 41</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1534 comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i></p> <p>Cross check with ICAO State Letter 41</p>
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>

comment	1646	comment by: Flughafen Linz-Hörsching - LNZ/LOWL
	cross check with ICAO State Letter 41	
response	Accepted	
	The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.	
comment	1718	comment by: London Luton Airport Operations Ltd
	this whole section should consider the period of exercises and table top exercises every 6 months should be allowed to incorporate other critical factors such as LVP table top, Partial exercises is a workable solution so long as a modular approach is permitted to extended learning.	
response	Noted	
comment	1747	comment by: Aéroport de Marseille - MRS/LFML
	It is appropriate to take up the ICAO State Letter 41 that introduces other types of exercises (modular tests). (cf. comment about AMC3-ADR-OPS.B.005)	
response	Noted	
	The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.	
comment	1771	comment by: ENAC Ente Nazionale per l'Aviazione Civile
	It could be useful to insert, as starting text of this GM, the note to the A14 9.1.13 (Std.) (transposed with AMC3-ADR-OPS.B.005). <i>"The purpose of a full-scale exercise is to ensure the adequacy of the plan to cope with different types of emergencies. The purpose of a partial exercise is to ensure the adequacy of the response to individual participating agencies and components of the plan, such as the communications system".</i>	
response	Accepted	
	Text revised accordingly.	
comment	1811	comment by: Aéroport Nantes Atlantique - NTE/LFRS
	Attachment #170	
	UAF	NPA 2011-20 (B.II) GM12-ADR-OPS.B.005
	Référence:	GM12-ADR-OPS.B005
	Emergency	Exercices
	Traduction	de courtoisie
	It is appropriate to take up the ICAO State Letter 41 that introduces other	

response	<p>types of exercises (modular tests). (cf. comment about AMC3-ADR-OPS.B.005)</p> <p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>
comment	<p>1883 comment by: <i>Irish Aviation Authority</i></p> <p><u>Comment 1</u>: Could a note be added to the effect that the emergency plan may be considered adequately tested if a major aircraft incident occurs at the Aerodrome</p> <p><u>Comment 2</u>: A tabletop exercise is a partial emergency exercise and the six month interval is too onerous. Agencies outside the aerodrome's control may not be able to participate at this suggested frequency.</p>
response	<p>Accepted</p> <p>Comment 1 is already included in AMC3-ADR.OPS.B.005. Comment 2 is agreed and text is revised in order to reflect the scope of the tabletop exercises.</p>
comment	<p>1892 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to take up the ICAO State Letter 41 that introduces other types of exercises (modular tests). (cf. comment about AMC3-ADR-OPS.B.005)</p>
response	<p>Accepted</p> <p>Comment 1 is already included in AMC3-ADR.OPS.B.005</p> <p>Comment 2 is agreed and text is revised in order to reflect the scope of the tabletop exercises.</p>
comment	<p>1917 comment by: <i>Dublin Airport Authority</i></p> <p>(c) A requirement to hold a tabletop exercise every six months is too resource intensive from both a time and cost perspective.</p>
response	<p>Accepted</p> <p>Text has been revised to focus on the scope of the tabletop exercises.</p>
comment	<p>2030 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Delete (c): a tabletop exercise could be accepted as the partial exercise.</p>
response	<p>Not accepted</p> <p>A tabletop emergency exercise could not be accepted as a partial exercise.</p>
comment	<p>2039 comment by: <i>Shannon Airport</i></p>

response	<p>(c) A requirement to hold a tabletop exercise every six months is too resource intensive from both a time and cost perspective.</p> <p>Accepted</p> <p>Text has been revised to focus on the scope of the tabletop exercises.</p>				
comment	<p>2110 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>GM12 ADR-OPS.B005 (c) - Table top exercises to be held every six months. Disagree.</p> <p>Six monthly will be difficult to achieve bearing in mind the strategic emergency planning groups requirement to be involved</p>				
response	<p>Accepted</p> <p>Text has been revised to focus on the scope of the tabletop exercises.</p>				
comment	<p>2131 comment by: <i>TAG Farnborough Airport Ltd</i></p> <p>Para (c) (1) Table top exercises - 6 months is too onerous. Minimum of annually would be sufficient.</p>				
response	<p>Accepted</p> <p>Text has been revised to focus on the scope of the tabletop exercises.</p>				
comment	<p>2195 comment by: <i>Flughafen Klagenfurt</i></p> <p>Cross check with ICAO State Letter 41</p>				
response	<p>Accepted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.</p>				
comment	<p>2220 comment by: <i>Glasgow Prestwick</i></p> <p>Hot debrief after exercise with all representatives possible although more than seven days may be required for follow up</p>				
response	<p>Noted</p>				
comment	<p>2341 comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i></p> <table border="1" data-bbox="383 1724 1396 2016"> <tr> <td data-bbox="383 1724 805 1803">Référence: GM12-ADR-OPS.B005</td> <td data-bbox="805 1724 1396 1780">Emergency Exercises</td> </tr> <tr> <td data-bbox="383 1803 805 2016">Proposition/commentaire</td> <td data-bbox="805 1803 1396 2016">Il convient de reprendre la Lettre aux Etats n°41 de l'OACI qui introduit d'autres types d'exercice (les essais modulaires). (cf. commentaire sur l'AMC3-ADR-OPS.B.005)</td> </tr> </table>	Référence: GM12-ADR-OPS.B005	Emergency Exercises	Proposition/commentaire	Il convient de reprendre la Lettre aux Etats n°41 de l'OACI qui introduit d'autres types d'exercice (les essais modulaires). (cf. commentaire sur l'AMC3-ADR-OPS.B.005)
Référence: GM12-ADR-OPS.B005	Emergency Exercises				
Proposition/commentaire	Il convient de reprendre la Lettre aux Etats n°41 de l'OACI qui introduit d'autres types d'exercice (les essais modulaires). (cf. commentaire sur l'AMC3-ADR-OPS.B.005)				

Justification	
Traduction de courtoisie	It is appropriate to take up the ICAO State Letter 41 that introduces other types of exercises (modular tests). (cf. comment about AMC3-ADR-OPS.B.005)

response Noted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

comment 2362 comment by: *Norwich International Airport*

AMC3-ADR-OPS.B.005 — Aerodrome emergency exercise

The aerodrome operator should ensure that the emergency plan is tested by conducting:

(a) a full-scale aerodrome emergency exercise at intervals not exceeding two years;

Consider including proposed modular approach to exercises (currently with ICAO) and where a real incident has occurred taking account of lessons.

response Partially accepted

The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet. Further consideration will be given in the future.

Testing of the emergency plan when a real incident has occurred, is already included in AMC3-ADR.OPS.B.005

comment 2372 comment by: *Norwich International Airport*

GM12 — ADR-OPS.B.005 Emergency Exercises
(c) Tabletop exercises

(1) Tabletop exercises may be held every six months, except during that six month period when a full-scale emergency exercise is held.

6 months too onerous.

New proposed text

" (1) Tabletop exercises should be held in the intervening period between full-scale emergency exercises."

response Noted

comment 2470 comment by: *Isavia*
GM12-ADR-OPS.B005, (c)(1) on page 143: Tabletop exercises every six months is not obtainable for many aerodromes! We suggest to change the advice of this GM to yearly.

response Accepted
Text has been revised to focus on the scope of the tabletop exercises.

comment 2485 comment by: *DAA Cork Airport*
(c) (1) - A requirement to hold a tabletop exercise every six months is too resource intensive from both a time and cost perspective.

response Accepted
Text has been revised to focus on the scope of the tabletop exercises.

comment 2588 comment by: *EAL AFS - Edinburgh Airport*
GM12-ADR-OPS.B.005-Emergency Exercises

(c) Tabletop exercises
(1) Tabletop exercises may be held every six months, except during that six month period when a full-scale emergency exercise is held.
Consider changing table -top exercises from 6 to 12 months, which is a more realistic timescale.

response Accepted
Text has been revised to focus on the scope of the tabletop exercises.

comment 2604 comment by: *Stansted Airport - Daren BARTHAM*
GM12 — ADR-OPS.B.005 Emergency Exercises
(c) Tabletop exercises

(1) Tabletop exercises may be held every six months, except during that six month period when a full-scale emergency exercise is held.
Is 6 months too onerous?

response Accepted
Text has been revised to focus on the scope of the tabletop exercises.

comment	<p>1570 comment by: <i>ECA - European Cockpit Association</i></p> <p>At least 1 responding vehicle should be equipped with a headset, and a VHF air frequency radio transceiver.</p> <p>Justification: Self-explanatory.</p>
response	<p>Accepted</p> <p>The requirement for direct communication between the flight crew and the RFFS crew has been added as point (c) in AMC1 - ADR.OPS.B.010.</p>
comment	<p>1571 comment by: <i>ECA - European Cockpit Association</i></p> <p>Add paragraphs as follows:</p> <p>(c) A discrete frequency should be provided linking the incident commander with the flight crew. This frequency should be standardised globally and displayed on all relevant charts.</p> <p>(d) The communications between the incident commander and the flight crew should use standard phraseology and the incident commander should have English Proficiency Level 3.</p> <p>(e) Proper training on the use of the ICAO hand signals should be provided to the RFFS personnel.</p> <p>Justification: It is of utmost importance that the flight crew and the incident commander are able to communicate in a direct way. Especially in cases where an evacuation could be possible it must be possible for the incident commander and the flight crew to communicate recommendations, intentions and information in an easy and fast way via voice. A discrete test frequency has been used in several countries for the last two years with great success. It is the best way of interaction with the outside personnel and avoids communication around three corners (Pilot-Controller-Incident Commander-Controller-Pilot).</p>
response	<p>Noted</p> <p>AMC1-ADR.OPS.B.010 has been revised to address the communication between flight crew and RFFS crew.</p>
comment	<p>2125 comment by: <i>EAL AFS - Edinburgh Airport</i></p> <p>AMC4-ADR-OPS.B010</p> <p>For all-cargo operations the amounts of media should be related to the Practical Critical Area of the aircraft based on the crew seating area and adjacent emergency exits.</p> <p>Rescue and fire-fighting standards are based on the saving of life therefore for those aircraft which are cargo only the RFFS requirements need only be based on the part of the plane where the crew sit during take-off and landing and adjacent exits. However the emergency pan for the aerodrome and consideration of the aircraft by its operator may</p>

require a greater response.

Proposed Text: New Item (q) "Subject to the approval of the Competent Authority, the amounts of media in Table 1 can be adjusted for all-cargo operations if the principle of controlling fire within the Practical Critical Area is applied to the crew seating areas and adjacent exit routes. It is recognised that the aerodrome and aircraft operator may require greater amounts of fire-fighting media to deal with the risks adjacent to the aerodrome or the loss of the aircraft.

response

Noted

The issue of fire protection for all cargo operations will be dealt in the future since many States in Europe follow a different approach, and the guidance from ICAO is very limited.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS –
SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT
AND INSTALLATIONS (ADR.OPS.B) – AMC2-ADR-OPS.B.010 – RFFS** p. 144-145
level of protection

comment

140

comment by: CAA-NL

In (a) (2), (3) and (4) we suggest to change 'expected to operate at' into 'normally using' as is used in ICAO Annex 14, 9.2.5, because the aircraft type normally using the aerodrome is a defined figure.

We suggest to delete subpart (a) (3) and (4), because the ICAO Annex 14 recommendation 9.2.4 should be implemented in the AMC as well.

response

Partially accepted

The word 'expected' is replaced by the 'normally using' in order to align the text with ICAO Annex 14, 9.2.5.

comment

208

comment by: BAA

(a)(3) The effects of a reduced RFFS response in this situation must be taken into account.

response

Noted

comment

209

comment by: BAA

Table 1 - If remission was agreed, Table 1 would mean that an incident involving an aircraft up to 39m in length could be dealt with using 1 RFFS vehicle. This would not be operationally sound from a fire fighting point of view.

response

Noted

comment

216

comment by: KLM

Delete wording.

Both words "expected" to be deleted as the actual number of movements is what counts not the figure that is expected by an undefined person or organisation.

It is recalled that in line with the preamble of ICAO Annex 14, the RFFS levels described in the NPA are those to be achieved by the aerodrome operator. This is different from the RFFS levels to be applied by aircraft operators during flight operations, which is subject to ICAO Annex 6.

response

Noted

The word 'expected' is replaced by the 'normally using' in order to align the text with ICAO Annex 14, 9.2.5. The issue of flight operations is not dealt with in this NPA.

comment

219

comment by: KLM

Change wording:

(2) 'Expected' is the wrong wording. This may imply that from a management point of view the largest aircraft types can be expected but from the actual view the aircraft that are actually operating at the airport is what has to be covered in RFF and not what may come in the future.

The wording from ICAO shall be copied and this expected has to be replaced by :

.. based on the longest aeroplane **normally using** the aerodrome and their fuselage width.

Chang wording

(2) 'Expected' is the wrong wording. This may imply that from a management point of view the largest aircraft types can be expected but from the actual view the aircraft that are actually operating at the airport is what has to be covered in RFF and not what may come in the future.

The wording from ICAO shall be copied and this expected has to be replaced by :

.. based on the longest aeroplane **normally using** the aerodrome and their fuselage width.

Delete:

These two times mentioned "expected" have to be deleted and replaced by:

- if the number of movements of the aeroplanes in the highest category normally using the aerodrome is less than 700 in theetc.
- If the number of movements of the aeroplanes in the highest category normally using the aerodrome is equal or above 700 in the... etc

It is recalled that in line with the preamble of ICAO Annex 14, the RFFS levels described in the NPA are those to be achieved by the aerodrome operator. This is different from the RFFS levels to be applied by aircraft

	operators during flight operations, which is subject to ICAO Annex 6.
response	<p>Noted</p> <p>The word 'expected' is replaced by the 'normally using' in order to align the text with ICAO Annex 14, 9.2.5. The issue of flight operations is not dealt with in this NPA.</p>
comment	<p>228 comment by: <i>KLM</i></p> <p>Add</p> <p>(3) an aerodrome operator should not forbid access to an aircraft in case the RFFS is downgraded or in case of incidental flight into the aerodrome with an aircraft exceeding the available RFF category..</p> <p>Clarification The aircraft operator will decide to operate to the airport taking into account the information issued e.g. by NOTAM about the downgraded RFFS level or the safety level for its operation at a certain aerodrome.</p> <p>(Annex 14 is not intended to regulate flight operations, see below).</p> <p>It is recalled that in line with the preamble of ICAO Annex 14, the RFFS levels described in the NPA are those to be achieved by the aerodrome operator. This is different from the RFFS levels to be applied by aircraft operators during flight operations, which is subject to ICAO Annex 6.</p>
response	Noted
comment	<p>281 comment by: <i>Manchester Airport plc</i></p> <p>(a) (3) Remission in the UK has been removed from CAT 3 - 10 airports. Any reduction would need to consider the implications on Task and Resource Analysis dealing with fire and rescue operations.</p>
response	<p><i>Partially accepted</i></p> <p>Items (3) and (4) has been moved to GM5 - ADR.OPS.B.010.</p>
comment	<p>328 comment by: <i>Belfast International Airport - BFS/EGAA</i></p> <p>We strongly agree with this section.</p>
response	Noted
comment	<p>523 comment by: <i>CTIF The International Fire and Rescue Organization - Airport Commission</i></p> <p>(3) It is not allowed to do this way in many countries. Item 3 have to be taken away.</p>
response	<p>Partially accepted</p> <p>Items (3) and (4) has been moved to GM5 - ADR.OPS.B.010.</p>

comment	611 (1) And rates of application, should be entered after agents.	comment by: <i>BAA Glasgow</i>
response	Accepted Proposal has been included in (a) (1).	
comment	612 (3) This Remission factor within the current UK regulation has been removed from Cat 3-10 airports. Any remission reduction would need to consider the implications on the Task and Resource Analysis determining the level of protection available and the aerodromes ability to deal with a larger aircraft incident than they have resources available.	comment by: <i>BAA Glasgow</i>
response	Partially accepted Items (3) and (4) has been moved to GM5 - ADR.OPS.B.010.	
comment	968 For cargo aircraft EASA should allow lower categories of RFFS as the key point for the RFFS is to save life. Thus there should be flexibility to allow operations of cargo aircraft which have lower numbers of people on board than passenger aircraft - this should not be solely based on the physical size of the aircraft. Cargo operations often happen at night and can be at times when there are much fewer passenger movements, if any. Thus there should be the option to reduce the fire cover as there are so few people on board the aircraft. This is allowed under UK CAA and should continue and be recognised by EASA.	comment by: <i>BAA Airside operations</i>
response	Noted The issue of fire protection for all cargo operations will be dealt in the future since many States in Europe follow a different approach and the guidance from ICAO is very limited. Refer also to GM5 - ADR.OPS.B.010.	
comment	1200 The adaptation of the RFF category is aligned with additional costs and efforts for aerodromes. Therefore it should be only required if it is really necessary. By relating the needed change to "expected" operations it is very likely that there will have to be much more changes of the RFF within a shorter time frame. The wording must be adapted according the ICAO Annex 14: 9.2.5 The aerodrome category shall be determined from Table 9-1 and shall be based on the longest aeroplanes normally using the aerodrome and their fuselage width.	comment by: <i>Airport Nuremberg - NUE/EDDN</i>

to prevent unnecessary and arbitrary costs to aerodromes. It would be very unfortunate if the aerodrome has to invest a lot of money to change the RFF category just to find out eventually that the expected operation of the aeroplane needing the higher category has been cancelled prior to the start of operation or immediately after the start of operation.

response Accepted
 Text revised.

comment 1331 comment by: UK CAA

Page No: 145

Paragraph No: AMC2-ADR-OPS.B.010 (a)(3)

Comment: The use of remission is based on 700 movements with no consideration of the effects of a reduction in the response capability. Additionally, the paragraph does not reflect the Recommended Practice 9.2.4 in ICAO Annex 14 (which recommends that RFFS category is NOT reduced if there are fewer than 700 movements of aeroplanes in the highest category normally using the aerodrome). The CAA believes that remission should not be included. However, the UK believes there is a case for flexibility around the level of response as part of contingency arrangements where the RFFS resources at an aerodrome are diminished.

Justification: To allow a reduction in capability with no consideration of the impact of that reduced capability is flawed and has potential for loss of life. The RFFS category is based on the largest aircraft expected to use the aerodrome, whilst the fire fighting media requirement is based on the average size of aircraft in a category. To allow remission (a reduction of one category below if the number of movements of the largest aircraft is less than 700 in the busiest consecutive three months of the year) could allow an aircraft at the top of the category to be dealt with by an amount of media related to an aircraft considerably smaller. The contingency planning and arrangements should be used for all depletions including those used by aircraft operators as part of diversion arrangements.

Proposed Text: Revised Item **“(3) As part of contingency arrangements an aerodrome operator should make plans for a reduction in the level of protection provided by the RFFS where there are unavoidable circumstances. Any reduction should be for as short a time as possible, no less than one category below the determined category and the tasks of the reduced RFFS protection must be pre-planned and set out in the emergency plan.”**

Delete item (4).

response Noted
 Points (a) (3) and (a) (4) had been moved to GM5 - ADR.OPS.B.010.

comment 1332 comment by: UK CAA

Page No: 145

Paragraph No: AMC3-ADR-OPS.B.010, Table 1

Comment: The UK has a significant concern that the aerodrome category table specifies insufficient numbers of RFFS vehicles for aerodrome categories 5 and 10. For category 5 the table could allow an Airbus A320 aircraft (of 37.57m in length and carrying a maximum of 180 passengers) to use an aerodrome taking advantage of remission (Category 5 if allowed) with a response of one fire vehicle with media only capable of dealing with a fire in an aircraft of maximum length of 28m.

For category 10 the numbers of vehicles specified are considered to be insufficient to cover the size of the aircraft.

Justification: International Civil Aviation Organisation (ICAO) Annex 14, Chapter 9 sets out the requirements for the rescue and fire fighting service (RFFS). The resources including vehicles, extinguishing agent and personnel are based on a category derived from the length and fuselage width of an aircraft. This principle was developed in 1971 and has recently been reviewed by the USA Federal Aviation Agency and found to continue to be a sound basis for the provision of RFFS. These recommendations were used to develop the SARP's in ICAO Annex 14 dealing with RFFS. However many states could not fully resource to the level set out in the SARP's and two reduction means were introduced. One was remission (on which the UK CAA has commented separately) and the other was to reduce the amount of fire fighting media by 1/3 based on previous incidents involving fire. This led to a reduction in the number of vehicles, notably for categories 5 and 10.

For category 5, assuming that remission is allowed in these rules, the CAA believes there will not be enough fire fighting media available at an incident at an airport taking advantage of remission and accepting Airbus A320 or Boeing 737 size aircraft with a maximum passenger capacity of 180. Aircraft in both these families have up to 8 emergency exits. This requires tactics in fire fighting to protect these exits. The CAA believes that it will be a challenge for one vehicle to protect all the exits especially if a fire is below the aircraft and affecting both sides. Even if remission is not allowed the size of the aircraft puts the fire fighting capability at the limit. The UK currently requires 2 vehicles.

Similarly for RFFS Category 10 ICAO allows an Airbus A380 aircraft carrying a maximum of 853 passengers a response of only three fire vehicles. The accepted tactics for dealing with such a large aircraft are to divide the RFFS response into 4 quarters. There are 16 escape slides that will require protection in the event of an emergency evacuation. Three vehicles will not be able to practically provide a suitable level of protection to the slides. The UK currently requires 4 vehicles.

Proposed Text:

"Aerodrome Category	Rescue and fire-fighting vehicles
5	2
10	4"

response Noted

The Agency notes the comment by UK CAA. The number of RFF vehicles proposed is the minimum one and recommended by ICAO. The Agency will consider this proposal in the future.

comment	1558	comment by: <i>ECA - European Cockpit Association</i>
	Delete Paragraph (a)(3), (a)(4) and (b)	
	Justification: We don't accept the concept of the so called "remission factor" which allows the RFF service capability to be reduced below that required by the largest aeroplane type using the aerodrome.	
	Reference: IFALPA Annex 14, paragraphs 9.2.3. to 9.2.7.	
response	Partially accepted	
	Points (a) (3) and (a) (4) had been moved to GM5 - ADR.OPS.B.010.	

comment	1692	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none">• AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.010 — RFFS level of protection (p144-145)	
	<u>2. Justification and proposed text / comment</u>	
	This comment is critical, as it would generate huge costs in aerodromes have to increase their level of protection for some punctual big aeroplanes coming at the aerodrome.	
	AMC2 is identical to ADR.002 corresponding item.	
	In paragraph (a)(2) of AMC2, the term used in ICAO Annex 14 Volume 1, which is « normally using », has been replaced by « expected to operate ». With « expected to operate », some persons may understand that the planning of a single flight would change the level of protection, even if there are very rare flights with this aeroplane on the platform (for example, once per month or per year): this should not be the case, and would generate huge costs. In order to avoid this possible confusion, it is also proposed to add a criterion to indicate what can be considered as "normally using": in France, we use a traffic threshold, which is in our regulation. This threshold is 24 movements of the critical aircraft on three consecutive months.	
	As indicated above the RFF level of protection determines the number of vehicles and quantities of extinguishing agents which both have an impact on the number and location of fire stations and emergency access roads which should comply with the CS-ADR-DSN.T.900, CS-ADR-DSN.T.905 and CS-ADR-DSN.T.915.	
	Concerning the wording "RFF category", it is confusing, as the table uses "aerodrome category" : it is proposed to use "RFF aerodrome category"	
	Finally, there is no guidance related to the taking into account of sheer cargo operations as specified in Annex 14, 9.2.6 Note 1.— See guidance in the Airport Services Manual (Doc 9137), Part 1, for categorizing aerodromes, including those for all-cargo aircraft operations, for rescue and fire fighting purposes. It is proposed AESA include this point in a new guidance related to AMC2-ADR-OPS.B.010.	

Therefore the proposal of the following changes:

- **AESA includes this point in a new guidance related to AMC2-ADR-OPS.B.010.**
- **modification of AMC2-ADR-OPS.B.010 as follows :**

AMC2-ADR-OPS.B.010

“(a) The aerodrome operator should ensure that:

(1) the level of protection normally available at an aerodrome is determined and expressed in terms of the category of the rescue and fire-fighting services (RFF aerodrome category) (...);

(2) the RFF aerodrome category is determined according to the Table 1, based on the longest aeroplanes expected to operate on a regular basis at the aerodrome and their fuselage width. If, after selecting the category appropriate to the longest aeroplane’s overall length, that aeroplane’s fuselage width is greater than the maximum width in Table 1, column 3, for that category, then the category for that aeroplane should actually be one category higher;

(3) if the number of expected movements of the aeroplanes in the RFF aerodrome category (...)

(4) if the number of expected movements of the aeroplanes in the RFF aerodrome category (...)

(b) The aerodrome operator should ensure that during anticipated periods of reduced activity, the level of protection available is no less than that needed for the highest category of aeroplane planned to use the aerodrome during that time irrespective of the number of movements.”

response Accepted

The proposal to replace the phrase ‘expected to operate’ with the phrase ‘normally using’ has been accepted. The proposal to add the word ‘aerodrome’ in the term ‘RFF category’ has also been accepted.

comment 1693 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX III — Part-OPS — AMC2-ADR-OPS.B.010 — RFFS level of protection (p144-145)

2. Justification and proposed text / comment

This comment is critical, as it would generate huge costs in aerodromes have to increase their level of protection for some punctual big aeroplanes coming at the aerodrome.

AMC2 is identical to ADR.002 corresponding item.

In paragraph (a)(2) of AMC2, the term used in ICAO Annex 14 Volume 1, which is « normally using », has been replaced by « expected to operate ». With « expected to operate », some persons may understand that the planning of a single flight would change the level of protection, even if there are very rare flights with this aeroplane on the platform (for example, once per month or per year): this should not be the case, and would generate huge costs. In order to avoid this possible confusion, it is also proposed to add a criterion to indicate what can be considered as “normally using”: in France, we use a traffic threshold, which is in our

regulation. This threshold is 24 movements of the critical aircraft on three consecutive months.

As indicated above the RFF level of protection determines the number of vehicles and quantities of extinguishing agents which both have an impact on the number and location of fire stations and emergency access roads which should comply with the CS-ADR-DSN.T.900, CS-ADR-DSN.T.905 and CS-ADR-DSN.T.915.

Concerning the wording "RFF category", it is confusing, as the table uses "aerodrome category" : it is proposed to use "RFF aerodrome category"

Finally, there is no guidance related to the taking into account of sheer cargo operations as specified in Annex 14, 9.2.6 Note 1.— See guidance in the Airport Services Manual (Doc 9137), Part 1, for categorizing aerodromes, including those for all-cargo aircraft operations, for rescue and fire fighting purposes. **It is proposed AESA include this point in a new guidance related to AMC2-ADR-OPS.B.010.**

Therefore the proposal of the following changes:

- **AESA includes this point in a new guidance related to AMC2-ADR-OPS.B.010.**
- **modification of AMC2-ADR-OPS.B.010 as follows :**

AMC2-ADR-OPS.B.010

"(a) The aerodrome operator should ensure that:

(1) the level of protection normally available at an aerodrome is determined and expressed in terms of the category of the rescue and fire-fighting services (RFF aerodrome category) (...);

(2) the RFF aerodrome category is determined according to the Table 1, based on the longest aeroplanes expected to operate on a regular basis at the aerodrome and their fuselage width. If, after selecting the category appropriate to the longest aeroplane's overall length, that aeroplane's fuselage width is greater than the maximum width in Table 1, column 3, for that category, then the category for that aeroplane should actually be one category higher;

(3) if the number of expected movements of the aeroplanes in the RFF aerodrome category (...)

(4) if the number of expected movements of the aeroplanes in the RFF aerodrome category (...)

(b) The aerodrome operator should ensure that during anticipated periods of reduced activity, the level of protection available is no less than that needed for the highest category of aeroplane planned to use the aerodrome during that time irrespective of the number of movements."

response Accepted

The proposal to replace the phrase 'expected to operate' with the phrase 'normally using' has been accepted. The proposal to add the word 'aerodrome' in the term 'RFF category' has also been accepted.

comment 1720

comment by: London Luton Airport Operations Ltd

(3) If the number of expected movements of the aeroplanes in the RFF category is less than 700 in the busiest consecutive three months, the level of protection is not less than one category below the determined category; There is no remission in the UK so a risk analysis process for

	resources and the task need to be considered here.
response	Partially accepted Items (3) and (4) has been moved to GM5 - ADR.OPS.B.010.
comment	1772 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i> Delete (a)(4) and change (a)(3) as follows: <i>"If the number of expected movements of the aeroplanes in the RFF category is limited and not continuous in the busiest consecutive months, the level of protection is not less than one category below the determined category".</i> Provide an additional GM: <i>"The number of the movements in the highest category considered for the concession included in AMC2-ADR-OPS.B.010 (a)(3) may be proportionate to the aerodrome size, traffic and nature and volume of operations. At medium traffic density aerodromes a level of protection that is one category below the determined category may be provided for a limited period where:</i> <i>- the number of movements of the aeroplanes in the highest category normally using the aerodrome is less than 700 in the busiest consecutive three months;</i> <i>- there is a wide range of difference between the dimensions of the aeroplanes included in reaching 700 movements".</i>
response	Partially accepted Points (a) (3) and (a) (4) had been moved to GM5 - ADR.OPS.B.010.
comment	1806 comment by: <i>AIRBUS</i> In order to be harmonized with ICAO, we suggest to replace "expected to operate" by "normally using" in the following sentence: (2) the RFF category is determined according to the Table 1, based on the longest aeroplanes expected to operate normally using at the aerodrome and their fuselage width. If, after selecting the category appropriate to the longest aeroplane's overall length, that aeroplane's fuselage width is greater than the maximum width in Table 1, column 3, for that category, then the category for that aeroplane should actually be one category higher;
response	Accepted Text has been revised accordingly.
comment	2068 comment by: <i>AENA - Aeropuertos Españoles y Navegación Aérea</i> This comment is critical , as it would generate huge costs in aerodromes have to increase their level of protection for some punctual big aeroplanes coming at te aerodrome.

AMC2 is identical to ADR.002 corresponding item.

In paragraph (a)(2) of AMC2, the term used in ICAO Annex 14 Volume 1, which is « normally using », has been replaced by « expected to operate ». With « expected to operate », some persons may understand that the planning of a single flight would change the level of protection, even if there are very rare flights with this aeroplane on the platform (for example, once per month or per year or maybe that flight never happen): this should not be the case, and would generate huge costs. In order to avoid this possible confusion, it is also proposed to add a criteria to indicate what can be considered as "normally using": we use a traffic threshold. This threshold is 24 movements of the critical aircraft on three consecutive months.

As indicated above the RFF level of protection determines the number of vehicles and quantities of extinguishing agents which both have an impact on the number and location of fire stations and emergency access roads which should comply with the CS-ADR-DSN.T.900, CS-ADR-DSN.T.905 and CS-ADR-DSN.T.915.

Concerning the wording "RFF category", it is confusing, as the table uses "aerodrome category" : it is proposed to use "RFF aerodrome category"

Finally, there is no guidance related to the taking into account of sheer cargo operations as specified in Annex 14, 9.2.6 Note 1.— See guidance in the Airport Services Manual (Doc 9137), Part 1, for categorizing aerodromes, including those for all-cargo aircraft operations, for rescue and fire fighting purposes. **It is proposed AESA include this point in a new guidance related to AMC2-ADR-OPS.B.010.**

Therefore the proposal of the following changes:

- AESA includes this point in a new guidance related to AMC2-ADR-OPS.B.010.

- modification of AMC2-ADR-OPS.B.010 as follows :

AMC2-ADR-OPS.B.010

"(a) The aerodrome operator should ensure that:

(1) the level of protection normally available at an aerodrome is determined and expressed in terms of the category of the rescue and fire-fighting services (RFF aerodrome category) (...);

(2) the RFF aerodrome category is determined according to the Table 1, based on the longest aeroplanes ~~expected to operate~~ normally using on a regular basis, 24 movements of the critical aircraft on three consecutive months, at the aerodrome and their fuselage width. If, after selecting the category appropriate to the longest aeroplane's overall length, that aeroplane's fuselage width is greater than the maximum width in Table 1, column 3, for that category, then the category for that aeroplane should actually be one category higher;

(3) If the number of expected movements of the aeroplanes in the RFF aerodrome category (...)

(4) If the number of expected movements of the aeroplanes in the RFF aerodrome category (...)

(b) The aerodrome operator should ensure that during anticipated periods of reduced activity, the level of protection available is no less than that needed for the highest category of aeroplane planned to use the aerodrome during that time irrespective of the number of movements.

response Accepted
The proposal to replace the phrase 'expected to operate' with the phrase 'normally using' has been accepted. The proposal to add the word 'aerodrome' in the term 'RFF category' has also been accepted.

comment 2081 comment by: *Infratil Airports Europe Ltd*
Page No: 145
Paragraph No: AMC2-ADR-OPS.B.010 RFFS Level of Protection (a) (3) & (4)
Comment Greater clarification is required with regards use of this policy. There are different interpretations of the term "determined category". Is this the category of the aircraft referred to with less than 700 movements and its category as defined by table 1 (eg for a 747-400 the determined category is cat 9) or does this in fact mean, the promulgated category as shown in the AIP entry. If an aerodrome promulgated category 7 with category 8 & 9 by prior arrangement, can this principle be used to accept a category 9 aircraft (eg 747-400) with category 8 RFFS service? A worked example would help to clarify the intention of this rule.

response Partially accepted
Points (a) (3) and (a) (4) had been moved to GM5 - ADR.OPS.B.010.

comment 2082 comment by: *Infratil Airports Europe Ltd*
Page No: 145
Paragraph No: AMC2-ADR-OPS.B.010 RFFS Level of Protection (a) (3) & (4)
Comment IAEL support use of this risk based approach previously referred to by ICAO as "Remission Factor"

response Noted

comment 2085 comment by: *IATA*
AMC2-ADR-OPS.B.010 – RFFS level of protection
Add
(3) an aerodrome operator should not forbid access to an aircraft in case the RFFS is downgraded or in case of incidental flight into the aerodrome with an aircraft exceeding the available RFF category..

Clarification
The aircraft operator will decide to operate to the airport taking into account the information issued e.g. by NOTAM about the downgraded RFFS level or the safety level for its operation at a certain aerodrome.

	<p>(Annex 14 is not intended to regulate flight operations, see below).</p> <p>It is recalled that in line with the preamble of ICAO Annex 14, the RFFS levels described in the NPA are those to be achieved by the aerodrome operator. This is different from the RFFS levels to be applied by aircraft operators during flight operations, which is subject to ICAO Annex 6.</p>
response	Noted

comment	2093 comment by: IATA
	<p>AMC2-ADR-OPS.B.010 – RFFS level of protection</p> <p>Add</p> <p>(3) an aerodrome operator should not forbid access to an aircraft in case the RFFS is downgraded or in case of incidental flight into the aerodrome with an aircraft exceeding the available RFF category..</p> <p>Clarification The aircraft operator will decide to operate to the airport taking into account the information issued e.g. by NOTAM about the downgraded RFFS level or the safety level for its operation at a certain aerodrome.</p> <p>(Annex 14 is not intended to regulate flight operations, see below).</p> <p>It is recalled that in line with the preamble of ICAO Annex 14, the RFFS levels described in the NPA are those to be achieved by the aerodrome operator. This is different from the RFFS levels to be applied by aircraft operators during flight operations, which is subject to ICAO Annex 6.</p>
response	Noted

comment	2111 comment by: HIA - Highlands and Islands Airports Limited
	<p>AMC2-ADR-OPS.B010 (2) - there is no dispensation for all cargo aircraft - these are excluded in the UK definition of commercial air transport.</p> <p>AMC2-ADR-OPS.B010 (3) - If the level of expected movements in a RFFS category is less than 700 movements in the busiest 3 months the level of protection is not less than one category below the determined category.(remission factor).</p> <p>Fully support with this principle based on task and resource analysis</p>
response	Noted
	<p>The issue of fire protection for all cargo operations will be dealt in the future since many States in Europe follow a different approach and the guidance from ICAO is very limited</p>

comment	2167 comment by: ECA - European Cockpit Association
	Questions on the whole section:

	<p>How will the flight crew of overflying aircraft will know what category the airport is, at a diversion? The AIP will contain only the normal category. What will the consecutive 3 month period mean? The future planned or the past experience? What if the airport is just starting operations with a larger aircraft?</p>
response	<p>Noted</p> <p>The availability of RFFS and the level of protection is normally published through AIPs, and for temporary changes through NOTAMS. The issue is dealt with in AMC-ADR.OPS.A.005 and AMC-ADR.OPS.A.015.</p>
comment	<p>2199 comment by: <i>Glasgow Prestwick</i></p> <p>The alerting system must be sufficient in alerting RFFS personnel who are carrying out carrying out other duties.</p>
response	<p>Noted</p>
comment	<p>2232 comment by: <i>Glasgow Prestwick</i></p> <p>consider reviewing RFFS category between passenger aircraft, freight aircraft and training aircraft. Can we review the requirement for a training aircraft with no passengers to have the same RFFS category as one full of passengers.</p>
response	<p>Noted</p> <p>The issue of fire protection for all cargo operations will be dealt with in the future since many States in Europe follow a different approach and the guidance from ICAO is very limited.</p>
comment	<p>2234 comment by: <i>Airport Operators Association</i></p> <p>AMC4-ADR-OPS.B010 - For all-cargo operations the amounts of media should be related to the Practical Critical Area of the aircraft based on the crew seating area and adjacent emergency exits.</p> <p>Justification: Rescue and fire-fighting standards are based on the saving of life therefore for those aircraft which are cargo only the RFFS requirements need only be based on the part of the plane where the crew sit during take-off and landing and adjacent exits. However the emergency plan for the aerodrome and consideration of the aircraft by its operator may require a greater response.</p> <p>AOA proposes a new Item (q) "Subject to the approval of the Competent Authority, the amounts of media in Table 1 can be adjusted for all-cargo operations if the principle of controlling fire within the Practical Critical Area is applied to the crew seating areas and adjacent exit routes. It is recognised that the aerodrome and aircraft operator may require greater amounts of fire-fighting media to deal with the risks adjacent to the aerodrome or the loss of the aircraft.</p>
response	<p>Noted</p> <p>The issue of fire protection for all cargo operations will be dealt with in the</p>

future since many States in Europe follow a different approach and the guidance from ICAO is very limited.

comment	2376	comment by: <i>Norwich International Airport</i>
	AMC2-ADR-OPS.B.010 — RFFS level of protection	
	(3) If the number of expected movements of the aeroplanes in the RFF category is less than 700 in the busiest consecutive three months, the level of protection is not less than one category below the determined category;	
	Remission in the UK has been removed from Cat 3-10 airports. Any reduction would need to consider the implications on Task and Resource Analysis dealing with fire and rescue operations.	
response	Noted	

comment	2391	comment by: <i>Glasgow Prestwick</i>
	Task resource analysis would have to be reviewed for remission. Wording should also be reviewed to ensure clear interpretation of 700 movements in busiest three months.	
response	Noted	

comment	2414	comment by: <i>East Midlands Airport - EMA/EGNX</i>
	(a) (3) Remission in the UK has been removed from CAT 3 - 10 airports. Any reduction would need to consider the implications on Task and Resource Analysis dealing with fire and resscue operations.	
response	Noted	

comment	2505	comment by: <i>AEA - Association of European Airlines</i>
	AMC2-ADR-OPS.B.010 — RFFS level of protection	
	(3) If the number of expected movements of the aeroplanes in the RFF category is less than 700 in the busiest consecutive three months, the level of protection is not less than one category below the determined category;	
	(4) If the number of expected movements of the aeroplanes in the RFF category is equal or above 700 in the busiest consecutive three months, the level of protection is equal to the determined category;	
	Comments Delete wording.	
	Both words "expected" to be deleted as the actual number of movements is what counts not the figure that is expected by an undefined person or organisation.	

It is recalled that in line with the preamble of ICAO Annex 14, the RFFS levels described in the NPA are those to be achieved by the aerodrome operator. This is different from the RFFS levels to be applied by aircraft operators during flight operations, which is subject to ICAO Annex 6.

response Noted

comment 2508 comment by: AEA - Association of European Airlines

1- AMC2-ADR-OPS.B.010 – RFFS level of protection

(2) the RFF category is determined according to the Table 1, based on the longest aeroplanes **expected** to operate at the aerodrome and their fuselage width. If, after selecting the category appropriate to the longest aeroplane's overall length, that aeroplane's fuselage width is greater than the maximum width in Table 1, column 3, for that category, then the category for that aeroplane should actually be one category higher;

2 - (3) If the number of **expected** movements of the aeroplanes in the RFF category is less than 700 in the busiest consecutive three months, the level of protection is not less than one category below the determined category;

(4) If the number of **expected** movements of the aeroplanes in the RFF category is equal or above 700 in the busiest consecutive three months, the level of protection is equal to the determined category

Comments

Change wording:

(2) 'Expected' is the wrong wording. This may imply that from a management point of view the largest aircraft types can be expected but from the actual view the aircraft that are actually operating at the airport is what has to be covered in RFF and not what may come in the future.

The wording from ICAO shall be copied and this expected has to be replaced by :

.. based on the longest aeroplane **normally using** the aerodrome and their fuselage width.

Chang wording

(2) 'Expected' is the wrong wording. This may imply that from a management point of view the largest aircraft types can be expected but from the actual view the aircraft that are actually operating at the airport

is what has to be covered in RFF and not what may come in the future.

The wording from ICAO shall be copied and this expected has to be replaced by :
.. based on the longest aeroplane **normally using** the aerodrome and their fuselage width.

Delete:
These two times mentioned "expected" have to be deleted and replaced by:
- if the number of movements of the aeroplanes in the highest category normally using the aerodrome is less than 700 in the ...etc.
- If the number of movements of the aeroplanes in the highest category normally using the aerodrome is equal or above 700 in the... etc

It is recalled that in line with the preamble of ICAO Annex 14, the RFFS levels described in the NPA are those to be achieved by the aerodrome operator. This is different from the RFFS levels to be applied by aircraft operators during flight operations, which is subject to ICAO Annex 6.

response

Accepted

The word 'expected' is replaced by the phrase 'normally using' in order to align the text with ICAO Annex 14, 9.2.5. The issue of flight operations is not dealt with in this NPA.

comment

2516

comment by: *AEA - Association of European Airlines*

AMC2-ADR-OPS.B.010 — RFFS level of protection

Comments

Add

(3) an aerodrome operator should not forbid access to an aircraft in case the RFFS is downgraded or in case of incidental flight into the aerodrome with an aircraft exceeding the available RFF category..

Clarification

The aircraft operator will decide to operate to the airport taking into account the information issued e.g. by NOTAM about the downgraded RFFS level or the safety level for its operation at a certain aerodrome.

(Annex 14 is not intended to regulate flight operations, see below).

It is recalled that in line with the preamble of ICAO Annex 14, the RFFS levels described in the NPA are those to be achieved by the aerodrome operator. This is different from the RFFS levels to be applied by aircraft operators during flight operations, which is subject to ICAO Annex 6.

response

Noted

comment

2583

comment by: *LJL Airport - Liverpool John Lennon Airport*

AMC2-ADR-OPS.B.010 — RFFS level of protection

(3) If the number of expected movements of the aeroplanes in the RFF category is less than 700 in the busiest consecutive three months, the level of protection is not less than one category below the determined category; **Remission in the UK has been removed from Cat 3-10 airports. Any reduction would need to consider the implications on Task and Resource Analysis dealing with fire and rescue operations.**

response Partially accepted

Items (3) and (4) has been moved to GM5 - ADR.OPS.B.010.

comment 2605 comment by: *Stansted Airport - Daren BARTHAM*

AMC2-ADR-OPS.B.010 – RFFS level of protection

(3) If the number of expected movements of the aeroplanes in the RFF category is less than 700 in the busiest consecutive three months, the level of protection is not less than one category below the determined category; **Remission in the UK has been removed from Cat 3-10 airports. Any reduction would need to consider the implications on Task and Resource Analysis dealing with fire and rescue operations.**

response Partially accepted

Items (3) and (4) has been moved to GM5 - ADR.OPS.B.010.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS –
SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT
AND INSTALLATIONS (ADR.OPS.B) – AMC3-ADR-OPS.B.010 –
Number of RFFS vehicles and rescue equipment**

p. 145-146

comment 170 comment by: *Swedavia AB - Swedish airports (currently 11 airports)*

(a) (1) Move to GM. Recommendations in ICAO Annex 14, 9.2.37. If not possible change wording to "The minimum number of vehicles included in the resque and fire fighting operations at the aerodrome" (the minimum water and foam volume could be carried by one vehicle).

response Noted

ICAO Annex 14, 9.2.37 Recommendation sets out the minimum requirements for the number of RFFS vehicles available at an aerodrome. It is possible that the minimum water and foam volume could be carried by one vehicle, but the aerodrome operator should also consider the tactics that should be followed when responding to an emergency.

comment 210 comment by: *BAA*

Incidents involving CAT 10 aircraft should be dealt with using 4 RFFS vehicles.

response *Noted*

ICAO Annex 14, 9.2.37 Recommendation proposes the minimum number of RFFS vehicles required at an aerodrome for a given category. However, this does not prevent the aerodrome operator to conduct an analysis in order to determine the exact number of vehicles required to act in an emergency.

comment 282 comment by: *Manchester Airport plc*
For a Category 10 aircraft (A380) tactics may require 4 sectors and hence 4 vehicles. The implications on Task and Rescue Analysis dealing with fire and rescue operations that have already been submitted for CAT 10 operations.

response *Noted*
ICAO Annex 14, 9.2.37 Recommendation proposes the minimum number of RFFS vehicles required at an aerodrome for a give category. However, this does not prevent the aerodrome operator to conduct an analysis in order to determine the exact number of vehicles required to act in an emergency.

comment 329 comment by: *Belfast International Airport - BFS/EGAA*
What is classed as a significant portion?

response *Noted*
The term 'significant portion cannot be defined. At each aerodrome the departure and arrivals routes should be taken into account together with accident statistics around aerodromes, type of traffic serving the aerodrome, etc.

comment 524 comment by: *CTIF The International Fire and Rescue Organization - Airport Commission*

CAT 5 have 2 vehicles in many countries because these airports are situated far away from municipal fire brigade. Table 1 have to be 2 vehicles in CAT 5.

response *Noted*
ICAO Annex 14, 9.2.37 Recommendation proposes the minimum number of RFFS vehicles required at an aerodrome for a give category. However, this does not prevent the aerodrome operator to conduct an analysis in order to determine the exact number of vehicles required to act in an emergency.

comment 613 comment by: *BAA Glasgow*
(1)
With the possibility of remission an A320 aircraft incident could be dealt with by one vehicle, this will limit the RFFS effectiveness to provide exit protection potentially to only one side of the aircraft.

For dealing with an A380 aircraft incident the tactics may require 4 sectors and subsequently 4 vehicles.

response Noted

ICAO Annex 14, 9.2.37 Recommendation proposes the minimum number of RFFS vehicles required at an aerodrome for a give category. However, this does not prevent the aerodrome operator to conduct an analysis in order to determine the exact number of vehicles required to act in an emergency.

comment 1035 comment by: *Swedish Regional Airport Association*

Move to GM or: Change wording to "The minimum number of vehicles included in the resque and fire fighting operations at the aerodrome" (the minimum water and foam volume could be carried by one vehicle)

response Noted

ICAO Annex 14, 9.2.37 Recommendation sets out the minimum requirements for the number of RFFS vehicles available at an aerodrome. It is possible that the minimum water and foam volume could be carried by one vehicle, but the aerodrome operator should also consider the tactics that should be followed when responding to an emergency.

comment 1559 comment by: *ECA - European Cockpit Association*

Change table as follows:

Aerodrome Category	Rescue and Fighting Vehicles
1	1
2	1
3	1
4	1
5	1 2
6	2
7	2 3
8	3 4
9	3 4
10	3 4

Justification:

Self-explanatory and linked to the other comments on the same issue.
As per IFALPA Annex 14, paragraph 9.2.37

response Noted

ICAO Annex 14, 9.2.37 Recommendation proposes the minimum number of RFFS vehicles required at an aerodrome for a given category. However, this does not prevent the aerodrome operator to conduct an analysis in to determine the exact number of vehicles required to act in an emergency.

comment 1560 comment by: *ECA - European Cockpit Association*

Add as follows under (b):

Rescue equipment should be maintained and located so that it can be

brought into action quickly and effectively within a pre-determined response time for deployment of flotation equipment.

Note.- Public or private organisations, suitably located and equipped, may be designated to provide or augment the specialist rescue equipment. Additional guidance on planning the rescue facilities in water is available in Chapter 13 of the **ICAO Airport Services Manual, Part I—Rescue and Fire Fighting** (Doc 9137).

Justification:

Self-explanatory.

Reference: IFALPA Annex 14, paragraph 9.x.1. on Rescue in water.

response

Partially accepted

ICAO Annex 14, 9.2.22 Recommendation refers to rescue equipment available on the rescue and firefighting vehicles. A new GM4 - ADR.OPS.B.010 has been provided to explain the need for the provision of additional rescue equipment.

comment

1695

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX III — Part-OPS — AMC3-ADR-OPS.B.010 — Number of RFFS vehicles and rescue equipment (p145-146)
- AMC/GM to ANNEX III — Part-OPS — GM3(bis)-ADR-OPS.B.010 — Number of RFFS personnel (p149)

2. Justification and proposed text / comment

- Paragraph (a)(1): For information, in France there is no vehicle for level 1 (it is a difference notified to ICAO). Moreover, some French aerodromes with instrument approach procedures decrease their level of protection to 1 or 2 during time periods by day or night. It is published in AIP.
- Paragraph (b) of AMC3-ADR-OPS.B.010 could be completed by guidance, including notes 1 and 2 of ICAO Annex 14 Volume 1 paragraph 9.2.2
- Table 1 should be renumbered Table 2.

Consequently, it is proposed :

- **that Table 1 be renumbered Table 2.**
- **to add a GM related to AMC3-ADR-OPS.B.010(b) on the number of RFFS vehicles and rescue equipment:**

GM3bis-ADR-OPS.B.010 – Number of RFFS vehicles and rescue equipment

"Special fire fighting equipment need not be provided for water areas; this does not prevent the provision of such equipment if it would be of practical use, such as when the areas concerned include reefs or islands. The objective is to plan and deploy the necessary life-saving flotation equipment as expeditiously as possible in a number commensurate with the largest aeroplane normally using the aerodrome."

response Accepted

ICAO Annex 14, 9.2.37 Recommendation proposes the minimum number of RFFS vehicles required at an aerodrome for a given category. However, this does not prevent the aerodrome operator to conduct an analysis in order to determine the exact number of vehicles required to act in an emergency

The proposed text for GM has been accepted and a new GM4 - ADR.OPS.B.010 has been drafted addressing the proposal.

comment 2075 comment by: *AENA - Aeropuertos Españoles y Navegación Aérea*

In some States, the National rules establish that the authority outside the Aerodrome for emergency is the regional authority, therefore is propose the following:

(b) If the aerodrome is located near a water/swampy area or other difficult environment, or a significant portion of the approach/departure operations take over these areas, the aerodrome operator **or the competent authority** should ensure that suitable rescue equipment and services are available.

response Partially accepted

The Agency recognises the fact that in many States the responsibility for dealing with emergencies rests to another authority. The intention is to ensure the existence of this equipment and we consider that the aerodrome operator should be part of the coordination. Text is revised accordingly to highlight the coordinating role of the aerodrome operator.

comment 2083 comment by: *Infratil Airports Europe Ltd*

Page No: 146
Paragraph No: AMC3-ADR-OPS.B.010 — Number of RFFS vehicles and rescue equipment - table 1

Comment A definition is required of "Rescue and Fire Fighting Vehicles" in this table. Does this mean major foam tenders? ICAO previously provided a guidance note alongside the table but this note has not been transferred across to EASA.

response Noted

comment 2084 comment by: *Infratil Airports Europe Ltd*

Page No: 146
Paragraph No: AMC3-ADR-OPS.B.010 — Number of RFFS vehicles and rescue equipment - table 1

Comment Category 5 with remission would allow an A320 size aircraft to be dealt

	with by one vehicle. Category 5 should require 2 vehicles
response	<p>Noted</p> <p>ICAO Annex 14, 9.2.37 Recommendation proposes the minimum number of RFFS vehicles required at an aerodrome for a given category. However, this does not prevent the aerodrome operator to conduct an analysis in order to determine the exact number of vehicles required to act in an emergency.</p>
comment	<p>2113 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p>AMC3-ADR-OPS.B010 - table 1 -Number of RFFS vehicles required – Cat 5 with remission would allow A320 to be dealt with by one vehicle.</p> <p>Agree with this principle based on task and resource analysis</p>
response	<p>Noted</p>
comment	<p>2148 comment by: <i>Danish Transport Authority</i></p> <p>GM with reference to Airport Services Manual (Doc 9137), Part 1. should be implemented to ensure rescue equipment commensurate with the level of aircraft operations provided on the rescue and fire-fighting vehicles;</p>
response	<p>Noted</p>
comment	<p>2415 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>For a Category 10 aircraft (A380) tactics may require 4 sectors and hence 4 vehicles. Implications on a Task and Resource Analysis dealing wth fire and rescue operations that have already been submitted for CAT 10 operations.</p>
response	<p>Noted</p> <p>The Agency decided to follow ICAO Annex 14, 9.2.37 Recommendation for the minimum number of RFFS vehicles. However, this does not prevent the aerodrome operator to conduct an analysis and increase the number of vehicles if it is necessary.</p>
comment	<p>2427 comment by: <i>Aberdeen Airport</i></p> <p>As per table 1 an Airbus 319/320 could potentialy be dealt with by one vehicle should remission be allowed.</p> <p>Consideration should be given that dealing with emergencies involving Category 10 aircraft may require four sectors, thus requiring four vehicles.</p>
response	<p>Noted</p> <p>ICAO Annex 14, 9.2.37 Recommendation proposes the minimum number of RFFS vehicles required at an aerodrome for a given category. However, this does not prevent the aerodrome operator to conduct an analysis in order to determine the exact number of vehicles required to act in an</p>

emergency.

comment

2503

comment by: *NTL Luftfarten*

AMC3-ADR-OPS.B.010 – Number of RFFS vehicles and rescue equipment *TXT*

(a) The aerodrome operator should ensure that:

(1) the minimum number of rescue and fire-fighting vehicles at the aerodrome, will be in accordance with the following table:

Aerodrome category	Rescue and fire-fighting vehicles
1	1
2	1
3	1
4	1
5	1
6	2
7	2
8	3
9	3
10	3

Tabel 1

response

Noted

The Agency decided to follow ICAO Annex 14, 9.2.37 Recommendation for the minimum number of RFFS vehicles. However, this does not prevent the aerodrome operator to conduct an analysis and increase the number of vehicles if it is necessary.

comment

2591

comment by: *EAL AFS - Edinburgh Airport*

AMC3-ADR OPS.B.010-Number of RFFS Vehcles and Rescue Equipment

(3) If the number of expected movements of the aeroplanes in the RFF category is less than 700 in the busiest consecutive three months, the level of protection is not less than one category below the determined category.

Remission in the UK has been removed from Cat 3-10 airports. Any reduction would need to consider the implications on Task and Resource Analysis dealing with fire and rescue operations.

response

Partially accepted

Items (3) and (4) has been moved to GM5 - ADR.OPS.B.010.

comment	2592	comment by: <i>EAL AFS - Edinburgh Airport</i>
	AMC3-ADR-OPS.B.010 – Number of RFFS vehicles and rescue equipment	
	(a) The aerodrome operator should ensure that:	
	(1) the minimum number of rescue and fire-fighting vehicles at the aerodrome, will be in accordance with the following table Category 5 with remission would allow an A320 size aircraft to be dealt with by one vehicle, this is totally unrealistic.	
	For a Category 10 aircraft (A380) tactics may require 4 sectors and hence 4 vehicles.	
response	Noted	
	ICAO Annex 14, 9.2.37 Recommendation proposes the minimum number of RFFS vehicles required at an aerodrome for a given category. However, this does not prevent the aerodrome operator to conduct an analysis in order to determine the exact number of vehicles required to act in an emergency.	

comment	2606	comment by: <i>Stansted Airport - Daren BARTHAM</i>
	AMC3-ADR-OPS.B.010 – Number of RFFS vehicles and rescue equipment	
	(a) The aerodrome operator should ensure that:	
	(1) the minimum number of rescue and fire-fighting vehicles at the aerodrome, will be in accordance with the following table Category 5 with remission would allow an A320 size aircraft to be dealt with by one vehicle.	
	For a Category 10 aircraft (A380) tactics may require 4 sectors and hence 4 vehicles.	
response	Noted	
	The Agency decided to follow ICAO Annex 14, 9.2.37 Recommendation for the minimum number of RFFS vehicles. However, this does not prevent the aerodrome operator to conduct an analysis and increase the number of vehicles if it is necessary.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC4-ADR-OPS.B.010 – Extinguishing agents	p. 146-148
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comment	31	comment by: <i>ACI EUROPE - Airports Council International</i>
	existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC	

response	<p>Justification: should not be in there now, since it is anticipating the ICAO state letter! Check!!</p> <p>Accepted</p> <p>Text revised.</p>
comment	<p>32 comment by: <i>ACI EUROPE - Airports Council International</i></p> <p>existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC</p> <p>Justification: should not be in there now, since it is anticipating the ICAO state letter! Check!!</p>
response	<p>Accepted</p> <p>Text revised.</p>
comment	<p>211 comment by: <i>BAA</i></p> <p>Level C foam is unlikely to have received ICAO approval by 30th April 2012</p>
response	<p>Accepted</p> <p>Text revised.</p>
comment	<p>212 comment by: <i>BAA</i></p> <p>Please make allowance for the provision of high Performance dry powders and allow quantities to be reduced accordingly</p>
response	<p>Noted</p> <p>Point (c) allows the use of other alternate agents having equivalent fire-fighting capability.</p>
comment	<p>213 comment by: <i>BAA</i></p> <p>AMC4 (d) Does this mean that CAT 3-10 airports can substitute 100% of their water requirements with complimentary agent?</p>
response	<p>Noted</p> <p>Point (d) has been revised.</p>
comment	<p>230 comment by: <i>BAA</i></p> <p>Gaseous agent or CO2 should be provided for engine fires etc.</p>
response	<p><i>Noted</i></p> <p>Point (c) allows the use of other alternate agents having equivalent fire-fighting capability.</p>

comment	231	comment by: BAA
	Please include the need for reserve agents to assist with fire fighting operations.	
response	Accepted	
	New point (j) is inserted, addressing ICAO Annex 14 9.2.21 Recommendation.	
comment	232	comment by: BAA
	Please include the provision of supplementary water supplies as per ICAO SARP 9.2.15	
response	Accepted	
	New point (k) is inserted.	
comment	233	comment by: BAA
	Please mention the need to consider the use of Compressed Air Foam Systems (CAFS)	
response	Noted	
comment	283	comment by: Manchester Airport plc
	(3) Level C foam is not yet confirmed by ICAO.	
	(4) (d) Wording is incorrect - only categories 1 and 2 can substitute up to 100%. This table is copied from ICAO and is based on the average size of aircraft. Operations for larger aircraft in the category should require a re-calculation.	
	(4) (i) Suggest new item (j) "The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution"	
	Also, New item (k) "A quantity of gaseous agent or CO2 should be provided for use of engine fires".	
	Also, new item (l) " A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome".	
	Also, new item (M) "Arrangements should be in place to manage the storage and testing of extinguishing agents".	
	Also, new item (n) " A water needs analysis should be conducted to determine	

	the availability of sufficient quantities of water for fire fighting".
response	<p>Noted</p> <p>Point (3) comment agreed. Point (4) (d) comment agreed and text revised accordingly. Point (4) (i) comment agreed and the proposed text replaced point (e). Proposed new point (k) is already included in (c). Proposed new point (l) has been agreed but the text from ICAO Annex 14, 9.2.21 is used instead. Proposed new point (m) has been agreed and new text has been proposed. Proposed new point (n) has been agreed and new text has been proposed.</p>
comment	<p>326 comment by: <i>CAA Austria - Ministry of Transport</i></p> <p>Existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC This article should not be in the EASA regulations as it is anticipating the publication of ICAO Annex 14 amdt 10.</p>
response	<p>Accepted</p> <p>Text revised.</p>
comment	<p>330 comment by: <i>Belfast International Airport - BFS/EGAA</i></p> <p>Performance Level C foam is not yet approved by ICAO.</p>
response	<p>Accepted</p> <p>Text revised.</p>
comment	<p>331 comment by: <i>Belfast International Airport - BFS/EGAA</i></p> <p>No minimum quantities of foam detailed in table.</p> <p>This figure is required to maintain the two shot system where the amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution. Within this document this has to be calculated using the application rate for type of foam being used.</p> <p>Wording is incorrect – only Categories 1 and 2 can substitute up to 100%.</p> <p>No mention of a quantity of gaseous agent or CO2 should be provided for use on engine fires.</p> <p>No mention of a 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome.</p> <p>No mention of storage and testing arrangements of extinguishing agents.</p> <p>No mention of a water needs analysis to determine the availability of sufficient quantities of water for fire fighting.</p>

	No mention of the amount of dry powder can be reduced by 50% if using Monnex?
response	Noted Comments agreed except the following: <ul style="list-style-type: none">• Inclusion of gaseous agents or CO₂, which are already included in point (c).• Reserves of foam concentrate and complementary agents are in accordance with ICAO Annex 14, 9.2.21 recommendation.• The reduction of the amount of dry powder by 50 % when using Monnex because the Agency at this stage prefers to follow the ICAO provisions. However, the Agency may address this issue in the future.
comment	361 comment by: <i>Avinor</i> AMC4.ADR.OPS.B.010. Existing products complying with level C foam are currently forbidden according to EC Law Directive 2006/122 EC
response	Accepted Text revised.
comment	529 comment by: <i>CTIF The International Fire and Rescue Organization - Airport Commission</i> In text have to be demands about testing of foam vehicles, storage and reserve supply.
response	Partially accepted New point (m) has been drafted to address storage and testing of extinguishing agents.
comment	555 comment by: <i>Flughafen Düsseldorf GmbH</i> Level C Schaum ist verboten.
response	Accepted Text revised.
comment	569 comment by: <i>Vienna International Airport</i> Existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC This article should not be in the EASA regulations as it is anticipating the publication of ICAO Annex 14 amdt 10
response	Accepted

	Text revised.
comment	<p>614 comment by: <i>BAA Glasgow</i></p> <p>(3) ICAO have yet to confirm level C Foam.</p>
response	<p>Accepted</p> <p>Text revised.</p>
comment	<p>615 comment by: <i>BAA Glasgow</i></p> <p>(D) The table is based on the average size of aircraft and the operations for larger aircraft should require a re calculation.</p>
response	<p>Accepted</p> <p>New point (I) has been drafted.</p>
comment	<p>616 comment by: <i>BAA Glasgow</i></p> <p>(I)</p> <p>Consider addition – “The amount of foam concentrate provided on each foam producing vehicle should be sufficient to produce at least two loads of foam solution.”</p> <p>Consider addition – “A quantity of gaseous agent or CO₂ should be provided for use on engine fires.”</p> <p>Consider addition – “A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome.”</p> <p>Consider addition – “Arrangements should be in place to manage the storage and testing of extinguishing agents.”</p> <p>Consider addition – “ A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting.”</p> <p>Consider Addition – “ The foam production performance of foam producing vehicles should be tested on acceptance, after any repair or work on foam proportioning systems, and at least every 12 months to ensure the finished foam meets the required level of property, specification and performance.”</p>
response	<p>Partially accepted</p> <p>Comments agreed except the following:</p> <ul style="list-style-type: none"> • Inclusion of gaseous agents or CO₂, which are already included in point (c). • Reserves of foam concentrate and complementary agents are in accordance with ICAO Annex 14, 9.2.21 recommendation. • Testing of foam production performance.

comment	<p>657 comment by: <i>Infratil Airports Europe Ltd</i></p> <p>Page No: 148</p> <p>Paragraph No: AMC4-ADR-OPS.B010</p> <p>Comment: For all-cargo and aircraft operating solely with crew on board for the purpose of flight training operations the amounts of media should be related to the Practical Critical Area of the aircraft based on the crew seating area and adjacent emergency exits.</p> <p>Justification: Rescue and fire-fighting standards are based on the saving of life therefore for those aircraft which are cargo only the RFFS requirements need only be based on the part of the plane where the crew sit during take-off and landing and adjacent exits. However the emergency plan for the aerodrome and consideration of the aircraft by its operator may require a greater response.</p> <p>Proposed Text: New Item: "Subject to the approval of the Competent Authority, the amounts of media in Table 1 can be adjusted for all-cargo and training operations if the principle of controlling fire within the Practical Critical Area is applied to the crew seating areas and adjacent exit routes. It is recognised that the aerodrome and aircraft operator may require greater amounts of fire-fighting media to deal with the risks adjacent to the aerodrome or the loss of the aircraft.</p>
response	<p>Noted</p> <p>The issue of fire protection for all cargo operations will be dealt with in the future since many States in Europe follow a different approach and the guidance from ICAO is very limited.</p>
comment	<p>814 comment by: <i>Dublin Airport Authority</i></p> <p>Level C is not yet confirmed by ICAO.</p> <ul style="list-style-type: none">· Suggest new items-(j) (j) - The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution";· (k) - A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome";· (l) - Arrangements should be in place to manage the storage and testing of extinguishing agents";(m) - "A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting."
response	<p>Noted</p> <p>Comments agreed except that the reserves of foam concentrate and complementary agents are in accordance with ICAO Annex 14, 9.2.21 recommendation.</p>

comment	922	comment by: <i>Cologne/Bonn Airport</i>
	existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC	
response	Accepted Text revised.	
comment	1182	comment by: <i>Salzburger Flughafen GmbH</i>
	Existing products complying with level C foam are currently forbidden EC LAW Directive 2006/122 EC	
	This article should not be in the EASA regulations as it is anticipating the publication of ICAO Annex 14 amendment 10	
response	Accepted Text revised.	
comment	1202	comment by: <i>Federal Office of Civil Aviation FOCA</i>
	Products complying with level C foam are currently forbidden in Switzerland. This provision should not be part of the ADR EASA regulations.	
response	Accepted Text revised.	
comment	1334	comment by: <i>UK CAA</i>
	Page No: 146	
	Paragraph No: AMC4-ADR-OPS.B010, (b)(3)	
	Comment: Level C fire-fighting foam has not as yet been approved by ICAO.	
	Justification: ICAO State Letter 11/41 has not been confirmed as yet. It appears within the NPA that some items from the State Letter such as Level C are included whilst others such as modular emergency exercises have not. For consistency either the proposals in SL 11/41 should all be included or excluded and added in once confirmed.	
	Proposed Text: Either: Delete references to Level C in (a)(3) and Table 1. Or: include all items proposed in SL 11/41.	
response	Accepted The provisions for performance level C foam have been deleted.	
comment	1335	comment by: <i>UK CAA</i>

Page No: 147

Paragraph No: AMC4-ADR-OPS.B010 (c)

Comment: High performance Dry Powders are proven to be twice as effective as standard powders and a reduction in quantity should be allowed where they are provided.

Justification: Where the performance of a product allows a reduction in quantity whilst maintaining an equivalent fire-fighting capability it should be recognised and allowed.

Proposed Text: Add to end of (c) "If high performance Dry Powders (in accordance with EN 615 standard where 1.5kg of powder extinguishes a 144B tray with a surface area of 4.52 sq. m.) are utilised the amount required may be reduced by 50%."

response

Noted

The Agency at this stage prefers to follow the ICAO provisions. However, point (c) allows the use of alternate agent to dry chemical powder provided that it has equivalent fire-fighting capability.

comment

1337

comment by: UK CAA

Page No: 148

Paragraph No: AMC4-ADR-OPS.B010

Comment: ICAO Recommendation 9.2.12 should be included in this rule, especially as State Letter 11-41 is proposing that the recommendation is changed to a standard from 1 January 2015.

Justification: ICAO Recommendation (Standard from 1 January 2015) 9.2.12 acknowledges that Table 1 is based on the average size of aircraft and the quantities should be adjusted where operations by larger aeroplanes are planned.

Proposed Text: Insert new Item (j) "At aerodromes where operations by aeroplanes larger than the average size in a given category are planned, the quantities of water should be recalculated and the amount of water for foam production and the discharge rates for foam solution should be increased accordingly."

response

Accepted

A new point (l) has been drafted addressing the proposal.

comment

1346

comment by: UK CAA

Page No: 148

Paragraph No: AMC4-ADR-OPS.B010

Comment: The NPA does not include ICAO Recommendation 9.2.14.

	<p>Justification: RFFS response is based upon the "two shot" system from vehicle design to tactics. The ICAO recommendation should be included.</p> <p>Proposed Text: New Item (k) (ICAO wording): "The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution."</p>
response	Accepted Point (e) has been replaced by the proposed text.

comment	1348 comment by: UK CAA Page No: 148 Paragraph No: AMC4-ADR-OPS.B010 Comment: The UK has significant concern that a gaseous agent or CO ² should be provided for engine or ancillary equipment fires. Justification: Fire-fighting foam and complementary agents are provided to deal with aviation fuel fed fires. For smaller engine or ancillary equipment fires foam or dry powder are not appropriate extinguishing agents and cause significant damage to equipment involving aftercare, servicing or clean-up. Proposed Text: New Item (l) "A quantity of gaseous agent or CO ² should be provided for use on engine fires."
response	Noted The use of alternate agents is allowed under (c).

comment	1351 comment by: UK CAA Page No: 148 Paragraph No: AMC4-ADR-OPS.B010 Comment: The UK has significant concerns that the NPA has not included ICAO recommendation 9.2.21. To not have reserve agents may hinder fire-fighting operations and/or not allow an aerodrome to re-open due to a lack of fire-fighting media. Justification: ICAO Recommendation 9.2.21 sets out a requirement for 200% of foam concentrate and complementary agent. However the UK has a filed difference to ICAO to require 200% of fire-fighting foam but only 100% of complementary media. The UK believes that 200% of complementary media as a reserve is onerous and burdens the aerodrome operator with unnecessary maintenance and replacement costs. Proposed Text: New Item (m) "A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome."
response	Partially accepted

New point (j) has been drafted, following ICAO Annex 14, 9.2.21 Recommendation.

comment

1352

comment by: UK CAA

Page No: 148

Paragraph No: AMC4-ADR-OPS.B010

Comment: Whilst there are general requirements to maintain equipment in the NPA the UK believes that a specific requirement around the management and storage of extinguishing agents should be made.

Justification: The effectiveness of fire-fighting media relies upon its correct management in terms of selection, storage, maintenance, testing and replacement. It would be all too easy for agent to be stored away in an unsuitable manner, not tested or maintained and shelf lives ignored without a specific requirement. The effectiveness of fire-fighting agent is critical to effective intervention at an aircraft fire.

Proposed Text: New Item (n) "Arrangements should be in place to manage extinguishing agents in terms of selection, storage, maintenance and testing."

response

Accepted

New point (m) has been drafted.

comment

1353

comment by: UK CAA

Page No: 148

Paragraph No: AMC4-ADR-OPS.B010

Comment: The NPA does not include ICAO Recommendation 9.2.15. To complement the provision of a two shot capability supplementary water supplies should be provided.

Justification: RFFS response is based upon the "two shot" system from vehicle design to tactics. The ICAO recommendation is a critical component of this provision and should be included.

Proposed Text: New Item (ICAO wording) (o) "Supplementary water supplies, for the expeditious replenishment of rescue and fire-fighting vehicles at the scene of an aircraft accident, should be provided."

response

Partially accepted

The Agency acknowledges the need for a water need analysis. New point (k) has been drafted, but with a different wording.

comment

1355

comment by: UK CAA

Page No: 148

Paragraph No: AMC4-ADR-OPS.B010

Comment: The requirements in this AMC and Table 1 should allow for new and emerging technologies and be recognised for the safety benefits they can provide.

Justification: New and emerging technological improvements in fire fighting media and means of application to an aircraft fire are to be encouraged and recognised. If the objective of dealing with a fire in the Practical Critical Area can be met and validated by accredited tests then they should be allowed within the rules.

Proposed Text: New Item (p) "The amounts of media in Table 1 can be adjusted if the principle of controlling fire within the Practical Critical Area is validated in accredited fire fighting performance tests, approved by the national authority and set out in an Alternative Means of Compliance."

response

Noted

The Agency preferred to follow ICAO provisions. However, these provisions do not forbid the use of new and emerging technologies through an alternative means of compliance.

comment

1356

comment by: UK CAA

Page No: 148

Paragraph No: AMC4-ADR-OPS.B010

Comment: For all-cargo operations the amounts of media should be related to the Practical Critical Area of the aircraft based on the crew seating area and adjacent emergency exits.

Justification: Rescue and fire-fighting standards are based on the saving of life therefore for those aircraft which are cargo only the RFFS requirements need only be based on the part of the plane where the crew sit during take-off and landing and adjacent exits. However the emergency plan for the aerodrome and consideration of the aircraft by its operator may require a greater response.

Proposed Text: New Item (q) "Subject to the approval of the Competent Authority, the amounts of media in Table 1 can be adjusted for all-cargo operations if the principle of controlling fire within the Practical Critical Area is applied to the crew seating areas and adjacent exit routes. It is recognised that the aerodrome and aircraft operator may require greater amounts of fire-fighting media to deal with the risks adjacent to the aerodrome or the loss of the aircraft.

response

Noted

The issue of fire protection for all cargo operations will be dealt with in the future since many States in Europe follow a different approach and the guidance from ICAO is very limited.

comment

1485

comment by: Flughafen Graz Betriebs GmbH

	<p>Existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC</p> <p>This article should not be in the EASA regulations as it is anticipating the publication of ICAO Annex 14 amdt 10</p>
response	<p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>1536 <i>comment by: Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i></p> <p>Existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC</p> <p>This article should not be in the EASA regulations as it is anticipating the publication of ICAO Annex 14 amdt 10</p>
response	<p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>1561 <i>comment by: ECA - European Cockpit Association</i></p> <p>Amend paragraph (h) to read as follows: The complementary agents comply with the appropriate specifications of the International Organisation for Standardisation (ISO). <u>The complementary agents available for fire fighting should be equivalent to or better than the following:</u> <u>(1) Potassium bicarbonate dry chemical; or</u> <u>(2) Halon 1211."</u></p> <p>Add following text as new paragraphs (j): (J) All foam concentrates should be approved or listed based on the following performance test requirements. (1) Performance level B foams such as aqueous film forming foams (AFFF) should meet the applicable fire extinguishing and the burnback performance requirements for the 50 sq ft (4.6m²) fire test in accordance with Military Specification MIL-F-24385, 7 January 1994. (2) Performance level A foams such as film forming fluoroprotein foam (FFFP), protein foam (P) and fluoroprotein foam (FP) agents should meet the applicable fire extinguishing and burnback performance requirements of Underwriters Laboratories Inc. Standard UL-162 (Type 3 application), July 6 1993."</p> <p>Justification: Reference: IFALPA Annex 14, paragraphs 9.2.9.x and 9.2.10.</p>
response	<p>Noted</p> <p>The proposed text comes from ICAO Annex 14, 9.2.18 Standard.</p>
comment	<p>1621 <i>comment by: Geneva International Airport (ROMIG)</i></p> <p>Existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC</p>

response	<p>This article should not be in the EASA regulations as it is anticipating the publication of ICAO Annex 14 amdt 10.</p> <p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>1624 comment by: <i>Geneva International Airport (ROMIG)</i></p> <p>Move the article to GM. If not possible change "movement area" into "manoeuvring area" This is in excess of the ICAO requirements. The risk on an Apron is also not the same as on the rest of the aerodrome.</p>
response	<p>Partially accepted</p> <p>Point (a) (2) in AMC5-ADR.OPS.B.010 has been revised in order to provide flexibility.</p>
comment	<p>1647 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i></p> <p>Existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC</p> <p>This article should not be in the EASA regulations as it is anticipating the publication of ICAO Annex 14 amdt 10</p>
response	<p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>1662 comment by: <i>Stansted Airport</i></p> <p>AMC4-ADR-OPS.B010</p> <p>Comment: For all-cargo operations the amounts of media should be related to the Practical Critical Area of the aircraft based on the crew seating area and adjacent emergency exits.</p> <p>Justification: Rescue and fire-fighting standards are based on the saving of life therefore for those aircraft which are cargo only the RFFS requirements need only be based on the part of the plane where the crew sit during take-off and landing and adjacent exits. However the emergency plan for the aerodrome and consideration of the aircraft by its operator may require a greater response.</p> <p>Proposed Text: New Item (q) "Subject to the approval of the Competent Authority, the amounts of media in Table 1 can be adjusted for all-cargo operations if the principle of controlling fire within the Practical Critical Area is applied to the crew seating areas and adjacent exit routes. It is recognised that the aerodrome and aircraft operator may require greater amounts of fire-fighting media to deal with the risks adjacent to the aerodrome or the loss of the aircraft.</p>

response

Noted

The issue of fire protection for all cargo operations will be dealt with in the future since many States in Europe follow a different approach and the guidance from ICAO is very limited.

comment

1697

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM to ANNEX III — Part-OPS — AMC4-ADR-OPS.B.010 — Extinguishing agents (p146-148)

2. Justification and proposed text / comment

• Table 1

Table 1 should be renumbered "Table 3" and the references in the AMC consequently updated.

• Paragraph (b)

In coherence with the amendment of ICAO Annex 14 Volume I, proposed in the State Letter 11/41 (Ref : AN 4/1.1.52-11/41), "or level C" should be added in the exception:

"...

except for aerodromes in categories 1 to 3, where it should preferably meet the minimum performance level B or C;

..."

• Paragraph (d)

An important information is given to EASA: France does not comply with the provisions stated for aerodrome category 1 and 2, for performance level B and complementary agents. In fact, the French regulation states that, for aerodrome category 1 and 2, no foam meeting performance B is used, but more complementary agents are required (respectively 50 kg dry chemical powders instead of 45 for Aerodrome category 1, and 250 kg dry chemical powders instead of 90 kg for Aerodrome category 2.

It should be specified that the quantities of water in column 2 of Table 3 should be used for the calculation of equivalent for foam production:

"[...]"

Note: The amounts of water specified for foam production should be taken in column 2 of Table 3 and are predicated on an application rate of 8.2 L/min/m² for a foam meeting performance level A, or 5.5.L/min/m² for a foam meeting performance level B and 3.75L/min/m² for a foam meeting performance level C.

"[...]"

response

Noted

The Agency decided to follow only ICAO approved and published material. The issue will be dealt with in the future.

comment

1707

comment by: *London Luton Airport Operations Ltd*

Comment: For all-cargo operations the amounts of media should be related to the Practical Critical Area of the aircraft based on the crew seating area and adjacent emergency exits.

Justification: Rescue and fire-fighting standards are based on the saving of life therefore for those aircraft which are cargo only the RFFS requirements need only be based on the part of the plane where the crew sit during take-off and landing and adjacent exits. However the emergency plan for the aerodrome and consideration of the aircraft by its operator may require a greater response.

Proposed Text: New Item (q) "Subject to the approval of the Competent Authority, the amounts of media in Table 1 can be adjusted for all-cargo operations if the principle of controlling fire within the Practical Critical Area is applied to the crew seating areas and adjacent exit routes. It is recognised that the aerodrome and aircraft operator may require greater amounts of fire-fighting media to deal with the risks adjacent to the aerodrome or the loss of the aircraft.

(b) Principal extinguishing agent includes:
(3) a foam meeting the minimum performance level C; or **Level C foam is not yet confirmed by ICAO.**

(d) The amounts of water for foam production and of the complementary agents provided on the rescue and fire-fighting vehicles are in accordance with the determined aerodrome category and Table 1; **This table is copied from ICAO and is based on the average size of aircraft. Operations for larger aircraft in the category should require a re-calculation.**

except that for aerodrome categories 1 and 2, up to 100 % of the water may be replaced by complementary agent. **Wording is incorrect - only Categories 1 and 2 can substitute up to 100%.**

(i) The discharge rate of complementary agents is not less than the values shown in Table 1. **Suggest new item (j) - "The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution." Also New Item (k) - "A quantity of gaseous agent or CO2 should be provided for use on engine fires." Also insert New Item (l) - "A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome." New item (m) - "Arrangements should be in place to manage the storage and testing of extinguishing agents." New Item (n) - " A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting."**

response

Noted
Refer to replies to similar comments.

comment

1918 comment by: *Dublin Airport Authority*
Level C is not yet confirmed by ICAO.
· Suggest new item (j) - "The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam

	<p>solution”;</p> <ul style="list-style-type: none"> · New item (k) – “A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome”; · New item (l) – “Arrangements should be in place to manage the storage and testing of extinguishing agents”; <p>New item (m) – “A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting.”</p>
response	<p>Noted</p> <p>Comments agreed except that the proposal for the reserve supplies is according to ICAO Annex 14, 9.2.21 Recommendation.</p>
comment	<p>2000 comment by: <i>Munich Airport International</i></p> <p>existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC</p> <p>Justification: should not be in there now, since it is anticipating the ICAO state letter! Check!!</p>
response	<p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>2027 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>level C foam products are forbidden</p>
response	<p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>2040 comment by: <i>Shannon Airport</i></p> <p>(b) 3 Level C is not yet confirmed by ICAO.</p> <ul style="list-style-type: none"> · Suggest new item (j) – “The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution”; <p>New item (k) – “A 200% reserve of foam concentrate and 100% of complementary</p> <ul style="list-style-type: none"> · agents should be available at the aerodrome”; · New item (l) – “Arrangements should be in place to manage the storage and testing of extinguishing agents”; <p>New item (m) – “A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting.”</p>
response	<p>Noted</p> <p>Comments agreed except that the proposal for the reserve supplies is according to ICAO Annex 14, 9.2.21 Recommendation.</p>
comment	<p>2114 comment by: <i>HIA - Highlands and Islands Airports Limited</i></p>

AMC4-ADR-OPS.B010 - Extinguishing Agents

Suggest adding new items -

- the amount of foam concentrate on a vehicle should be sufficient to produce at least 2 loads of foam solution
- a quantity of gaseous agent or CO₂ should be provided for use on engine fires
- a 200% reserve of foam concentrate and 100% of complimentary agent should be available at the aerodrome
- arrangements should be in place to manage the storage and testing of extinguishing agents
- a water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting
- if a high performance dry powder is used the amount required may be reduced by 50%. Note: High performance dry powder should be produced in accordance with EN615 standard

AMC4-ADR-OPS.B010 (b) Extinguishing Agents – Level C yet to be confirmed by ICAO

response

Noted

Comments agreed except the following:

- Inclusion of gaseous agents or CO₂, which are already included in point (c).
- Reserves of foam concentrate and complementary agents are in accordance with ICAO Annex 14, 9.2.21 Recommendation.
- The reduction of the amount of dry powder by 50% when using high performance dry powder, because the Agency at this stage prefers to follow the ICAO provisions. However, the Agency may address this issue in the future.

comment

2168

comment by: *ECA - European Cockpit Association*

Comment on (c)(i):

The foam concentration carried on the vehicle should be at least 2 times the required for the highest percentage of mixture: 6% x 10000l x 2= 120

Justification:

A provision to cope for additional foam is needed to deal with unexpected complications.

response

Accepted

Point (e) has been redrafted to include this provision.

comment

2196

comment by: *Flughafen Klagenfurt*

Existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC

response	<p>This article should not be in the AESA regulations as it is anticipating the publication of ICAO Annex 14 admt 10</p> <p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>2238 comment by: <i>Swedavia AB - Swedish airports (currently 11 airports)</i></p> <p>AMC4.ADR.OPS.B.010. Existing products complying with level C foam are currently forbidden according to EC Law Directive 2006/122 EC</p>
response	<p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>2247 comment by: <i>Aberdeen Airport Airside Operations</i></p> <p>For all cargo operations the amounts of media should be related to the Practical Critical Area of the aircraft based on the crew seating area and adjacent emergency exits</p> <p>Justification - Rescue and fire fighting standards are based on the saving of life therefore for those aircraft which are cargo only the RFFS requirements need only to be based on the part of the plane where the crew sit during take-off and landing and adjacent to exits. However the emergency pan for the aerodrome and consideration of the aircraft by its operator may require a greater response.</p> <p>Proposed Text: New Item (q) "Subject to the approval of the Competent Authority, the amounts of media in Table 1 can be adjusted for all cargo operations if the principle of controlling fire within the Practical Criteria Area is applied to the crew seating areas and adjacent exit routes. It is recognised that the aerodrome and the aircraft operator may require greater amounts of fire fighting media to deal with the risks adjacent to the aerodrome or the loss of the aircraft.</p>
response	<p>Noted</p> <p>The issue of fire protection for all cargo operations will be dealt with in the future since many States in Europe follow a different approach and the guidance from ICAO is very limited.</p>
comment	<p>2276 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>Existing products complying with level C foam are currently forbidden (EC Law Directive 2006/122). This type should therefore be deleted. It was only an ICAO state letter and is not yet implemented in the ICAO Annex 14.</p>
response	<p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>2304 comment by: <i>CAA Norway</i></p>

	<p>Products complying with level C foam are currently forbidden according to EC Law Directive 2006/122 EC and should be removed from this regulation.</p>
response	<p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
comment	<p>2344 comment by: <i>Norwich International Airport</i></p> <p>AMC4-ADR-OPS.B010</p> <p>Comment: For all-cargo operations the amounts of media should be related to the Practical Critical Area of the aircraft based on the crew seating area and adjacent emergency exits.</p> <p>Justification: Rescue and fire-fighting standards are based on the saving of life therefore for those aircraft which are cargo only the RFFS requirements need only be based on the part of the plane where the crew sit during take-off and landing and adjacent exits. However the emergency plan for the aerodrome and consideration of the aircraft by its operator may require a greater response.</p> <p>Proposed Text: New Item (q) "Subject to the approval of the Competent Authority, the amounts of media in Table 1 can be adjusted for all-cargo operations if the principle of controlling fire within the Practical Critical Area is applied to the crew seating areas and adjacent exit routes. It is recognised that the aerodrome and aircraft operator may require greater amounts of fire-fighting media to deal with the risks adjacent to the aerodrome or the loss of the aircraft.</p>
response	<p>Noted</p> <p>The issue of fire protection for all cargo operations will be dealt with in the future since many States in Europe follow a different approach and the guidance from ICAO is very limited.</p>
comment	<p>2374 comment by: <i>Norwich International Airport</i></p> <p>AMC4-ADR-OPS.B.010 — Extinguishing agents (b) Principal extinguishing agent includes: (3) a foam meeting the minimum performance level C; or</p> <p>Level C foam is not yet confirmed by ICAO.</p> <p>(d) The amounts of water for foam production and of the complementary agents provided on the rescue and fire-fighting vehicles are in accordance with the determined aerodrome category and Table 1; This table is copied from ICAO and is based on the average size of aircraft.</p> <p>Operations for larger aircraft in the category should require a re-calculation.</p> <p>except that for aerodrome categories 1 and 2, up to 100 % of the water may be replaced by complementary agent. Wording is incorrect – only Categories 1 and 2 can substitute up to 100%.</p>

response	Accepted Comments accepted Text revised accordingly.
comment	2418 comment by: <i>East Midlands Airport - EMA/EGNX</i> (b) (3) Level C foam is not yet confirmed by ICAO.
response	Accepted The provisions for performance level C foam have been deleted.
comment	2419 comment by: <i>East Midlands Airport - EMA/EGNX</i> (d) Wording is incorrect - only categories 1 and 2 can substitute up to 100%. This table is copied from ICAO and is based on the average size of aircraft. Operations for larger aircraft in the category should require a re-calculation.
response	Accepted Text revised accordingly.
comment	2420 comment by: <i>East Midlands Airport - EMA/EGNX</i> Suggest new item (j) "The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution"
response	Accepted Point (e) has been redrafted, based on the proposal.
comment	2421 comment by: <i>East Midlands Airport - EMA/EGNX</i> New item (k) "A quantity of gaseous agent or CO2 should be provided for use of engine fires".
response	Noted Point (c) already allows the use of alternate agents.
comment	2422 comment by: <i>East Midlands Airport - EMA/EGNX</i> new item (l) " A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome".
response	Partially accepted New item (j) has been drafted but the text is according to ICAO Annex 14, 9.2.21 Recommendation.
comment	2423 comment by: <i>East Midlands Airport - EMA/EGNX</i>

	<p>new item (M) "Arrangements should be in place to manage the storage and testing of extinguishing agents".</p>
<p>response</p>	<p>Accepted</p> <p>New item (m) has been drafted, including also the selection and maintenance of extinguishing agents.</p>
<p>comment</p>	<p>2424 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>new item (n) " A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting".</p>
<p>response</p>	<p>Accepted</p> <p>New point (k) have been drafted.</p>
<p>comment</p>	<p>2428 comment by: <i>Aberdeen Airport</i></p> <p>Consider including the following statement: "A reserve quantity of 200% foam concentrate and 100% complimentary agent should be provided at an aerodrome"</p>
<p>response</p>	<p>Partially accepted</p> <p>New item (j) has been drafted, but the text is according to ICAO Annex 14, 9.2.21 Recommendation.</p>
<p>comment</p>	<p>2471 comment by: <i>Isavia</i></p> <p>AMC4.ADR.OPS.B.010. Existing products complying with level C foam are currently forbidden according to EC Law Directive 2006/122 EC</p>
<p>response</p>	<p>Accepted</p> <p>The provisions for performance level C foam have been deleted.</p>
<p>comment</p>	<p>2486 comment by: <i>DAA Cork Airport</i></p> <p>(b) (3) - . Level C is not yet confirmed by ICAO.</p> <ul style="list-style-type: none"> · Suggest new item (j) – “The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution”; · New item (k) – “A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome”; · New item (l) – “Arrangements should be in place to manage the storage and testing of extinguishing agents”; <p>New item (m) – “A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting.”</p>
<p>response</p>	<p>Noted</p> <p>Comments agreed except that the proposal for the reserve supplies is according to ICAO Annex 14, 9.2.21 Recommendation.</p>

comment

2499

comment by: *Autopyro RFF consulting*

EASA NPA 2011-20 (A)

Comment on Section AMC4-ADR-OPS-B010 Table 1 Minimum usable amount of extinguishing agents.

Recommendation: Increase the minimum usable quantities of firefighting agents to provide sufficient agent quantities to control the longest potential aircraft in each specific aerodrome category. (Refer to table following)

Substantiation: The minimum numbers identified by EASA for the 3 particular levels of fire fighting foams performance have been extracted from the International Civil Aviation Organisation (ICAO) Table 9.2 proposed in the May 22nd, 2012 State letter. It is important to understand that these numbers were based in the early days on the calculations from a typical aircraft in each category, in many cases reverse calculations show that those aircraft used to calculate the requirements were around the median size with some minor variances.

To rectify this anomaly the ICAO Rescue and Fire Fighting Working Group has proposed to raise the numbers related to the calculations of Q1 and Q2 to the highest potential risk of the category. A current recommendation within the ICAO annex 14 (chapter 9.2.12) already suggests that each Aerodrome recalculate the amounts needed should an aircraft longer than the average normally utilize the aerodrome. Most States have difficulty applying this recommendation, not having been exposed to the Q1 and Q2 calculations.

The proposal to raise the numbers to the level of the highest risk was not retained by a higher level committee within the ICAO. However, the deliberation on the subject proposed to the States in the same May letter, a new standard to calculate the amounts required for each aircraft exceeding the current table requirements. It is Proposed that this new standard (9.2.12A) take effect in January of 2015, consequently making the EASA numbers redundant prior to their coming into force date in 4 years.

The National Fire Protection Association standard 403 which is considered a best practice consensus standard as adopted the higher number for Q1 and Q2.

It is considered that using the higher numbers would reduce the risks of loss of life and simplify the implementation of the EASA regulation by allowing aerodrome to plan early for the provision of the extra amount of agents without the risk of an undue financial burden and the need to recalculate each aircraft caused by the implementation of the ICAO requirement in 2015.

Note: The ICAO has not released the revisions to the Annex. Should they be published officially as drafted, each EASA State would be required to file a difference to the Standards 9.2.12A.

Proposed Table 1 Minimum Usable Amounts of Extinguishing Agents

Note: numbers have not been rounded to the Nearest 100 as they are in formal tables **Foam Level "C" 3.75 lpm/m²**

longest size

Category	Water	Disc. Rate
(l)	(l/min)	
1	315	315
2	534	420
3	995	765
4	1992	1261
5	4167	2381
6	6828	3414
7	9823	4290
8	14226	5645
9	18990	7034
10	24807	8554

Foam Level "B" 5.5 lpm/m²

longest size

Category	Water	Disc. Rate
(l)	(l/min)	
1	462	462
2	783	616
3	1459	1123
4	2921	1849
5	6112	3492
6	10015	5008
7	14407	6291
8	20865	8280
9	27853	10316
10	36384	12546

Foam Level "A" 8.2 lpm/m²

longest size

Category	Water	Disc. Rate
(l)	(l/min)	
1	689	689
2	1167	919

3	2176	1674
4	4355	2757
5	9112	5207
6	14931	7466
7	21480	9380
8	31108	12344
9	41526	15380
10	54246	18705

response

Noted

The Agency is aware of the ICAO proposals. However, it was decided not to consider any ICAO material which is not yet officially published. The Agency will address this issue in the future.

comment

2567

comment by: *ADV -German Airports Association*

AMC4.ADR.OPS.B.010

existing products complying with level C foam are currently forbidden EC Law Directive 2006/122 EC

Justification

should not be in there now, since it is anticipating the ICAO state letter! Check!!

response

Accepted

The provisions for performance level C foam have been deleted.

comment

2593

comment by: *EAL AFS - Edinburgh Airport*

AMC4-ADR-OPS.B.010 – Extinguishing agents

(b) Principal extinguishing agent includes:
(3) a foam meeting the minimum performance level C; or Level C
foam is not yet confirmed by ICAO.

(d) The amounts of water for foam production and of the complementary agents provided on the rescue and fire-fighting vehicles are in accordance with the determined aerodrome category and Table 1; This table is copied from ICAO and is based on the average size of aircraft. Operations for larger aircraft in the category should require a re-calculation.

except that for aerodrome categories 1 and 2, up to 100 % of the water may be replaced by complementary agent. Wording is incorrect

- only Categories 1 and 2 can substitute up to 100%.

(i) The discharge rate of complementary agents is not less than the values shown in

Table 1. Suggest new item (j) - "The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution."Also

New Item (k) – “A quantity of gaseous agent or CO₂ should be provided for use on engine fires.”
 Also insert New Item (l) – “A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome.”
 New item (m) – “Arrangements should be in place to manage the storage and testing of extinguishing agents.”
 New Item (n) – “ A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting.”

response

Noted

Comments **agreed** except the following:

- Inclusion of gaseous agents or CO₂, which are already included in point (c).
- Reserves of foam concentrate and complementary agents are in accordance with ICAO Annex 14, 9.2.21 Recommendation.

comment

2607 comment by: *Stansted Airport - Daren BARTHAM*

AMC4-ADR-OPS.B.010 – Extinguishing agents
 (b) Principal extinguishing agent includes:
 (3) a foam meeting the minimum performance level C; or **Level C foam is not yet confirmed by ICAO.**

(d) The amounts of water for foam production and of the complementary agents provided on the rescue and fire-fighting vehicles are in accordance with the determined aerodrome category and Table 1; **This table is copied from ICAO and is based on the average size of aircraft. Operations for larger aircraft in the category should require a re-calculation.**

except that for aerodrome categories 1 and 2, up to 100 % of the water may be replaced by complementary agent. **Wording is incorrect – only Categories 1 and 2 can substitute up to 100%.**

(i) The discharge rate of complementary agents is not less than the values shown in Table 1. **Suggest new item (j) – “The amount of foam concentrate provided on a vehicle should be sufficient to produce at least two loads of foam solution.”Also**
New Item (k) – “A quantity of gaseous agent or CO₂ should be provided for use on engine fires.”
Also insert New Item (l) – “A 200% reserve of foam concentrate and 100% of complementary agents should be available at the aerodrome.”
New item (m) – “Arrangements should be in place to manage the storage and testing of extinguishing agents.”
New Item (n) – “ A water needs analysis should be conducted to determine the availability of sufficient quantities of water for fire fighting.”

response

Noted

Comments agreed except the following:

- Inclusion of gaseous agents or CO₂, which are already included in point (c).

- Reserves of foam concentrate and complementary agents are in accordance with ICAO Annex 14, 9.2.21 Recommendation.

comment 2611 comment by: *Stansted Airport - Daren BARTHAM*

Paragraph No: AMC4-ADR-OPS.B010

Comment: For all-cargo operations the amounts of media should be related to the Practical Critical Area of the aircraft based on the crew seating area and adjacent emergency exits.

Justification: Rescue and fire-fighting standards are based on the saving of life therefore for those aircraft which are cargo only the RFFS requirements need only be based on the part of the plane where the crew sit during take-off and landing and adjacent exits. However the emergency plan for the aerodrome and consideration of the aircraft by its operator may require a greater response.

Proposed Text: New Item (q) "Subject to the approval of the Competent Authority, the amounts of media in Table 1 can be adjusted for all-cargo operations if the principle of controlling fire within the Practical Critical Area is applied to the crew seating areas and adjacent exit routes. It is recognised that the aerodrome and aircraft operator may require greater amounts of fire-fighting media to deal with the risks adjacent to the aerodrome or the loss of the aircraft.

response Noted

The issue of fire protection for all cargo operations will be dealt with in the future since many States in Europe follow a different approach and the guidance from ICAO is very limited.

comment 2613 comment by: *Airport Nuremberg - NUE/EDDN*

The second AMC4-ADR-OPS.B.010 (h) should be changed to (i).

response Noted

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC5-ADR-OPS.B.010 – Response time</p>	<p>p. 148</p>
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comment 33 comment by: *ACI EUROPE - Airports Council International*

stick to the exact wording of ICAO 9.2.23 (stick to three minute response time)

Justification: should not combine standard and recommendation! Huge impact for airports to change from 3 to 2 minutes

response Partially accepted

The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time.

comment 34 comment by: *ACI EUROPE - Airports Council International*
move it to GM! If not possible change "movement area" into "manoeuvring area"
Justification: risk profile on aprons

response Partially accepted
The Agency acknowledges the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment 64 comment by: *Amsterdam Airport Schiphol - AMS/EHAM (and D.A.A)*
Amsterdam Airport Schiphol and Dutch Aerodromes Association (NVL) fully support the comment and justification as submitted by ACI Europe, especially on article AMC5-ADR-OPS.B.010 because of the huge impact/investments for airports. The risk profile on an apron can not be equal to taxiways or even runways.

response *Noted*

comment 171 comment by: *Swedavia AB - Swedish airports (currently 11 airports)*
(a) (1) Stick to the exact wording of ICAO 9.2.23 (keep three minute response time).
(a) (2) Move to GM. If not possible change "movement area" into "manoeuvring area".

response Partially accepted
Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time
The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment 188 comment by: *SWISS AERODROMES ASSOCIATION*
Once more, the NPA makes an undue confusion between Standards and

	<p>Recommendations, illustrating one of the major drawbacks of the European regulatory system.</p> <p>There should be no more stringent requirements than those of ICAO, meaning that response time is 3 (three) minutes. Anything going beyond would have unacceptable consequences.</p> <p>At (a)(2), "movement area" should be replaced by "manoeuvring area" to be compliant with ICAO</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p>
comment	<p>234 comment by: <i>BAA</i></p> <p>Please include the need for any RFFS response to provide at least 50% of the discharge rate at the scene of an aircraft fire.</p>
response	<p>Accepted</p> <p>(a) (1) has been revised in order to address the comment.</p>
comment	<p>235 comment by: <i>BAA</i></p> <p>(a)(3) does address the principle of continuous application of extinguishing agents and should be amended to reflect this.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>284 comment by: <i>Manchester Airport plc</i></p> <p>(a) (1) Consider adding that 50% of required discharge rate is available within response time.</p> <p>(a) (3) There is a potential for a gap in media production of 1 minute. The time for the first arriving to backup should be 1 minute.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>327 comment by: <i>CAA Austria - Ministry of Transport</i></p>

	<p>(a)(1) change to: The operational objective of the rescue and fire fighting service shall be to achieve a response time not exceeding three minutes to any point of each operational runway, in optimum visibility and surface conditions.</p> <p>(a)(2) delete</p> <p>(a)(3) change to: Any vehicles, other than the first responding vehicle(s), required to deliver the amounts of extinguishing agents shall ensure continuous agent application and shall arrive no more than four minutes from the initial call.</p> <p>(a)(4) delete</p> <p>add: Response time is considered to be the time between the initial call to the rescue and fire fighting service, and the time when the first responding vehicle(s) is (are) in position to apply foam at a rate of at least 50 per cent of the discharge rate.</p> <p>Optimum visibility and surface conditions are defined as daytime, good visibility, no precipitation with normal response route free of surface contamination, e.g. water, ice or snow</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p> <p>(a) (3) has been revised to include the requirement that any vehicle other than the first responding vehicles will arrive one minute after them in order to ensure continuous agent application.</p>
comment	<p>362 comment by: <i>Avinor</i></p> <p>ACM5.ADR.OPS.B.010 (a) (1). Stick to the exact wording of ICAO 9.2.23 (stick to three minute response time)</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time.</p>
comment	<p>363 comment by: <i>Avinor</i></p>

	ACM5.ADR.OPS.B.010 (a) (2). Should be considered moved to GM. If this is not possible one should change "movement area" into "manoeuvring area".
response	Partially accepted The Agency acknowledges the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.
comment	527 comment by: <i>CTIF The International Fire and Rescue Organization - Airport Commission</i> Some countries and bigger airports have two minutes response time.
response	<i>Noted</i>
comment	557 comment by: <i>Flughafen Düsseldorf GmbH</i> a) 1) Es ist die Frage, ob die Zusammenfassung von einem ICAO Standard und einer Empfehlung in einer "höchstens" Formulierung nicht zu einer problematischen Auslegung führt. Der Fokus auf zwei Minuten würde bei vielen Flughäfen zu Problemen führen. a) 2) sollte zu den GMs verschoben werden.
response	Partially accepted Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.
comment	570 comment by: <i>Vienna International Airport</i> (a)(1) change to: The operational objective of the rescue and fire fighting service shall be to achieve a response time not exceeding three minutes to any point of each operational runway, in optimum visibility and surface conditions. (a)(2) delete (a)(3) change to: Any vehicles, other than the first responding vehicle(s), required to deliver the amounts of extinguishing agents shall ensure continuous agent application and shall arrive no more than four minutes from the initial call. (a)(4) delete

	<p>add: Response time is considered to be the time between the initial call to the rescue and fire fighting service, and the time when the first responding vehicle(s) is (are) in position to apply foam at a rate of at least 50 per cent of the discharge rate.</p> <p>Optimum visibility and surface conditions are defined as daytime, good visibility, no precipitation with normal response route free of surface contamination, e.g. water, ice or snow.</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p> <p>(a) (3) has been revised to include the requirement that any vehicle other than the first responding vehicles will arrive one minute after them, in order to ensure continuous agent application.</p>
comment	<p>617 comment by: <i>BAA Glasgow</i></p> <p>(1) Consider addition of adding that 50% of the required discharge rate is available at the scene within the response time.</p> <p>(3) Continuous application at the scene of an aircraft accident involving fire is critical, introducing a limit not exceeding 4 minutes has the potential of introducing a gap in production of 1 minute. The time from the first arriving vehicle and the back up should be 1 minute.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>673 comment by: <i>Aéroport La Rochelle - LRH/LFBH</i></p> <p>Attachment #171</p> <p>LFBH NPA 2011-20 (B.II) AMC5-ADR-OPS.B.010</p> <p>Référence : AMC5-ADR-OPS.B.010 Response time</p>

Proposition/commentaire

(a) (1) Il convient de modifier le (a) (1) de cet AMC de la manière suivante: "Rescue and fire-fighting service achieve a response time of ~~two three~~ **three** minutes, ~~but in no case exceeding three minutes~~, to any point of each operational runway, in optimum visibility and surface conditions;"
 (a) (2) Il convient de transférer le (a) (2) en GM en le modifiant de la manière suivante : « Rescue and fire-fighting service **may** achieve a response time not exceeding three minutes to any other part of the ~~movement~~ **manoeuvring** area, in optimum visibility and surface conditions; »

response

Partially accepted

Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time
 The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment

722

comment by: ADP : Aeroports de Paris

Référence : AMC5-ADR-OPS.B.010	Response time
Proposition/commentaire	<p>(a) (1) Il convient de modifier le (a) (1) de cet AMC de la manière suivante: "Rescue and fire-fighting service achieve a response time of two three three minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions;"</p> <p>(a) (2) Il convient de transférer le (a) (2) en GM en le modifiant de la manière suivante : « Rescue and fire-fighting service may achieve a response time not exceeding three minutes to any other part of the movement manoeuvring area, in optimum visibility and surface conditions; »</p> <p>L'UAF insiste particulièrement sur ces changements.</p>
Justification	<p>Il convient de respecter la norme de l'Annexe 14 de l'OACI qui indique un objectif opérationnel de 3 minutes et non la recommandation. Respecter un objectif opérationnel de 2 minutes est excessivement coûteux en personnel, véhicules voire en bâtiments pour un gain</p>

	<p>de sécurité loin d'être évident à démontrer.</p> <p>Le calcul de l'objectif opérationnel doit se faire pour les cas les plus cruciaux c'est-à-dire l'atterrissage et le décollage. Prendre en compte l'aire de manœuvre peut être un critère pour l'installation des casernes de pompiers ou postes d'incendie mais ne doit pas être un critère à vérifier dans le cadre d'une certification d'aérodrome. Sinon, cela entraînerait des changements avec des coûts significatifs pour un gain de sécurité faible.</p>
<p>Traduction de courtoisie</p>	<p>(a) (1) It is appropriate to modify the (a) (1) of this AMC in the following way : "Rescue and fire-fighting service achieve a response time of two three minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions;" It is appropriate to respect the ICAO Annex 14 normative reference that indicates a response time of 3 min and not the recommendation. Respecting a response time of 2 min is excessively costly in staff, vehicles, or even in buildings whereas the safety benefit is not easy to demonstrate.</p> <p>(a) (2) It is appropriate to transfer the (a) (2) to GM, modifying it in the following way: « Rescue and fire-fighting service may achieve a response time not exceeding three minutes to any other part of the movement manoeuvring area, in optimum visibility and surface conditions; » The calculation of response time must be done for the most crucial cases that is to say take-off and landing. Taking into account the manoeuvring area can be a criterion for the installation of fire stations or fire points and it cannot be a criterion to be checked for an aerodrome certification. Otherwise it would lead to expensive changes whereas safety benefit is low.</p> <p>ADP insists particularly on these changes.</p>
<p>response</p>	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time</p>

The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment 815 comment by: *Dublin Airport Authority*
 Consider adding that 50% of required discharge rate is available within the response time.
 There is a potential for a gap in media production of 1 minute. The time from the first arriving to backup should be 1 minute.

response Accepted
 Text revised accordingly.

comment 926 comment by: *Cologne/Bonn Airport*
 (a)(1), (3): stick to exact ICAO wording 9.2.23 and 9.2.27
 Justification: should not combine standard and recommendation. The proposed wording is misleading. Huge impact for airports to change from 3 to 2 minutes

response Partially accepted
 Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes response time.

comment 929 comment by: *Cologne/Bonn Airport*
 (a)(2):move it to GM! If not possible change "movement area" into "manoeuvring area"

response Partially accepted
 The Agency acknowledges the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment 942 comment by: *Union des Aéroports français - UAF*
 Attachment [#172](#)

UAF	NPA	2011-20	(B.II)	AMC5-ADR-OPS.B.010
Référence		:		AMC5-ADR-OPS.B.010
Response				time

Traduction de courtoisie
 (a) (1) It is appropriate to modify the (a) (1) of this AMC in the following way : "Rescue and fire-fighting service achieve a response time of ~~two three~~ **three** minutes, ~~but in no case exceeding three minutes~~, to any point of each operational runway, in optimum visibility and surface conditions;"
 It is appropriate to respect the ICAO Annex 14 normative reference that indicates a response time of 3 min and not the recommendation. Respecting a response time of 2 min is excessively costly in staff, vehicles, or even in buildings whereas the safety benefit is not easy to demonstrate.
 (a) (2) It is appropriate to transfer the (a) (2) to GM, modifying it in the following way: « Rescue and fire-fighting service **may** achieve a response time not exceeding three minutes to any other part of the ~~movement manoeuvring~~ **manoeuvring** area, in optimum visibility and surface conditions; »
 The calculation of response time must be done for the most crucial cases that is to say take-off and landing. Taking into account the manoeuvring area can be a criterion for the installation of fire stations or fire points and it cannot be a criterion to be checked for an aerodrome certification. Otherwise it would lead to expensive changes whereas safety benefit is low.
 The UAF insists particularly on these changes.

response

Partially accepted

Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time
 The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment

1032

comment by: MST / STR - Stuttgart Airport

- **Im ICAO-Annex 14 (Volume I), Chapter 9, Punkt 9.2.23 ist die "Response time" wie folgt definiert:**

"9.2.23 The operational objective of the rescue and fire-fighting service shall be to achieve a response time not exceeding three minutes to any point of each operational runway, in optimum visibility and surface conditions."

Hierzu führen die Recommendations (Punkt 9.2.24/9.2.25) im ICAO-Annex 14 (Volume I), Chapter 9 noch ergänzend an:

*"9.2.24. - Recommendation - The operational objective of the rescue and firefighting service **should***) be to achieve a response time not exceeding two minutes to any point of each operational runway, in optimum visibility and surface conditions.*

9.2.25.- Recommendation - The operational objective of the rescue

and fire-fighting service **should***) be to achieve a response time not exceeding three minutes to any other part of the movement area, in optimum visibility an surface conditions.

Note 1. – Response time is considered to be the time between the initial call to the rescue an fire-fighting service, and the time when the first responding vehicle(s) is (are) in position to apply foam at a rate of least 50 per cent of the discharge rate specified in Table 9-2.,

Note 2. – Optimum visibility and surface conditions are defined as daytime, good visibility, no precipitation with normal response route free of surface contamination e.g. water, ice or snow."

Anm.: *) Übersetzung/Definition = soll/sollen, beabsichtigen

- Demgegenüber sieht das EASA-NPA nun im AMC5-ADR-OPS.B.010 künftig folgende Regelung vor:

"(1) Rescue and fire-fighting service **achieve***) a response time of two minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions.

(2) Rescue and fire-fighting service **achieve***) a response time not exceeding three minutes to any other part of the movement area, in optimum visibility and surface conditions.[...]

Anm.: *) Übersetzung/Definition = erfüllen/erreichen/vollbringen

- **Die EASA-Regelung bedeutet eine Verschärfung gegenüber den bisherigen ICAO-Regelungen!**
- Aus unserer Sicht sollten die Formulierungen aus den Festlegungen der ICAO-Regelungen auch in diese EASA-AMC einfließen bzw. dort vollständig übernommen werden. Insbesondere die Kernaussage in der ICAO, Annex 14 (Volume I), Chapter 9, Punkt 9.2.23, in welcher von „sollen/sollte(n)“ gesprochen wird, während EASA davon ausgeht, dass die Vorgabe „erfüllt“ wird, ist sehr problematisch.
- Denn dadurch werden die Flughäfen hier quasi auf einen 100%-igen "Zielerreichungsgrad" festgelegt bzw. definiert sich dieser daraus, **während die ICAO durch die Verwendung einer „Soll“-Vorgabe eine flexiblere Auslegung der „Response time“ vorsieht und zulässt.** Denn die ICAO geht von 3 Minuten „Response time“ aus, während seitens der EASA festgeschrieben

werden soll, dass „zwei aber in keinem Fall drei Minuten“ überschritten werden dürfen. Im "worst case" wird sich die Behörde auf die Festlegung der "zwei Minuten" zurückziehen, da dort explizit genannt. Das könnte für manche Flughäfen z.B. die Verlegung bzw. Schaffung einer neuen / weiteren Feuerwache bedeuten! **Das ist völlig unverhältnismäßig!**

- **Deshalb sollten die bisherigen ICAO-Regelungen auch unverändert so übernommen werden, da dies sachgerecht ist und sich in der Praxis auch bewährt hat.**
- Denn auf Basis der bisherigen ICAO-Regelungen bleibt den operativen Einheiten (Rescue and fire-fighting service) ein angemessener Entscheidungs- sowie Handlungsspielraum erhalten, um die Einsatz- und Organisationsplanung auf die örtlichen Gegebenheiten, Erfordernisse und Möglichkeiten abzustimmen bzw. diese entsprechend berücksichtigen zu können.

response *Partially accepted*

Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.

comment *1037* comment by: *Swedish Regional Airport Association*

Stick to the exact wording of ICAO 9.2.23 (stick to three minute response time).

response *Partially accepted*

Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The intention is not to add additional burden to aerodromes other than those required by ICAO. However the proposed AMC aims also to improve the response time.

comment *1184* comment by: *Salzburger Flughafen GmbH*

(a)(1) change to:
The operational objective of the rescue and fire fightign service shall be to achieve a response time not exceeding three minutes to any point of each operational runway, in optimum visibility and surface conditions.
(a)(2) delete
(a)(3) change to:
Any vehicles, other than the first responding vehicle(s), required to deliver the amounts of extinguishing agents shall ensure continuous agent application and shall arrive no more than four minutes from the initial call.

	<p>(a)(4) delete</p> <p>add: response time is considered to be the time between the initial call to the rescue and fire fighting service, and the time when the first responding vehicle(s) is (are) in position to apply foam at a rate of at least 50 per cent of the discharge rate.</p> <p>Optimum visibility and surface conditions are defined as daytime, good visibility, no precipitation with normal response route free of surface contamination, e.g. water, ice or snow.</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p> <p>(a) (3) has been revised to include the requirement that any vehicle other than the first responding vehicles will arrive one minute after them in order to ensure continuous agent application.</p>
comment	<p>1203 <i>comment by: Federal Office of Civil Aviation FOCA</i></p> <p>ACM5.ADR.OPS.B.010 (a) (1): Please take over the exact wording of ICAO 9.2.23 (three minute response time). Standard and a recommendation should not be combined in a single article. A change from 3 to 2 minutes would have a huge impact on airports. Definition must be 3 minutes.</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.</p>
comment	<p>1219 <i>comment by: Airport Nuremberg - NUE/EDDN</i></p> <p>(1) The combination of ICAO standard and recommendation concerning the response time should be adapted according to the ICAO Annex 14 9.2.23. Having an actual time-frame for the response time could most likely lead to a misinterpretation. Placing the focus on 2 minutes could lead to further costs for the aerodrome, since it could require the building of additional fire stations. By giving a time frame (2-3 minutes) the</p>

	<p>realization is more difficult for aerodromes due to the lack of exact focus (2 minutes or 3 minutes respectively).</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.</p>
comment	<p>1220 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>a-2) Implementing the response time to any other part of the movement area of three minutes, leads to further costs for the aerodrome, since it could require the building of additional fire stations, needing more staff as well. This should be moved to the guidance material or changed to "maneuvering area".</p>
response	<p><i>Partially accepted</i></p> <p>The Agency acknowledges the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other, hand it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p>
comment	<p>1222 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>(3) The combination of ICAO standard and recommendation concerning the response time for other than first responding vehicles should be adapted according to the ICAO Annex 14 9.2.27. Having an actual time-frame for the response time could most likely lead to a misinterpretation. Placing the focus on 3 minutes could lead to further costs for the aerodrome, since it could require the building of additional fire stations. By giving a time frame (3-4 minutes) the realization is more difficult for aerodromes due to the lack of exact focus (3 minutes or 4 minutes respectively).</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.</p>
comment	<p>1271 comment by: <i>Zürich Airport</i></p> <p>Use ICAOs response time of three minutes mentioned in 9.2.23 (ICAO Annex 14). Difference between three and two minutes in the context of an</p>

	<p>AMC (binding and non-binding) isn't clear. Limit of response time should be set on three minutes (this includes two minutes response time).</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.</p>
comment	<p>1358 comment by: UK CAA</p> <p>Page No: 148</p> <p>Paragraph No: AMC5-ADR-OPS.B010</p> <p>Comment: The UK has significant concerns that any response must include a requirement for at least 50% of the discharge rate to be available at an aircraft fire.</p> <p>Justification: For clarity, and in alignment to ICAO Note 1 to Recommendation 9.2.25, there should be a requirement to set out a minimum requirement of 50% of fire-fighting agent to be available within the response time.</p> <p>Proposed Text: Add to (a) (1) and (2) "and be in a position/s to apply foam at a rate of at least 50% of the discharge rate specified in AMC4-ADR-OPS.B010 Table 1."</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>1360 comment by: UK CAA</p> <p>Page No: 148</p> <p>Paragraph No: AMC5-ADR-OPS.B010 (a) (3)</p> <p>Comment: The rule would allow a gap in the delivery of fire-fighting agent and should be amended to allow the continuous application of agent.</p> <p>Justification: If vehicles arrive at an incident within two minutes and commence discharging fire-fighting media at their full rate the foam would be discharged within three minutes. This proposal for up to four minutes would therefore allow a gap of one minute in fire fighting operations. For continuous application the remaining vehicles should be at the incident at least one minute after the first responding.</p> <p>Proposed Text: "...achieve continuous agent application and arrive one minute after the first responding vehicles."</p>

response Accepted
Text revised accordingly.

comment 1489 comment by: *Flughafen Graz Betriebs GmbH*

(a)(1) change to:
The operational objective of the rescue and fire fighting service shall be to achieve a response time not exceeding three minutes to any point of each operational runway, in optimum visibility and surface conditions.

(a)(2) delete

(a)(3) change to:
Any vehicles, other than the first responding vehicle(s), required to deliver the amounts of extinguishing agents shall ensure continuous agent application and shall arrive no more than four minutes from the initial call.

(a)(4) delete

add:
Response time is considered to be the time between the initial call to the rescue and fire fighting service, and the time when the first responding vehicle(s) is (are) in position to apply foam at a rate of at least 50 per cent of the discharge rate.

Optimum visibility and surface conditions are defined as daytime, good visibility, no precipitation with normal response route free of surface contamination, e.g. water, ice or snow.

response Partially accepted

Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time

The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

(a) (3) has been revised to include the requirement that any vehicle other than the first responding vehicles will arrive one minute after them in order to ensure continuous agent application.

comment 1540 comment by: *Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH*

(a)(1) change to:
The operational objective of the rescue and fire fighting service shall be to achieve a response time not exceeding

three minutes to any point of each operational runway, in optimum visibility and surface conditions.
(a)(2) delete
(a)(3) change to:
Any vehicles, other than the first responding vehicle(s), required to deliver the amounts of extinguishing agents shall ensure continuous agent application and shall arrive no more than four minutes from the initial call.
(a)(4) delete

add:
Response time is considered to be the time between the initial call to the rescue and fire fighting service, and the time when the first responding vehicle(s) is (are) in position to apply foam at a rate of at least 50 per cent of the discharge rate.

Optimum visibility and surface conditions are defined as daytime, good visibility, no precipitation with normal response route free of surface contamination, e.g. water, ice or snow.

response

Partially accepted

Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time

The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

(a) (3) has been revised to include the requirement that any vehicle other than the first responding vehicles will arrive one minute after them in order to ensure continuous agent application.

comment

1564

comment by: ECA - European Cockpit Association

Delete (a)(1) and replace with following text:
It should be demonstrated that the rescue and fire fighting services are capable of achieving a response time not exceeding two minutes to any part of the movement area and critical rescue and fire fighting access area in all conditions of visibility and surface conditions when flight operations are in progress.

Delete (a)(2)

Amend text as follows (a)(3):

Any vehicle, other than the first responding vehicle(s), required to deliver the amount of extinguishing agents specified in Table 1 of AMC4-ADR-OPS.B.010 achieve continuous agent application and arrive ~~in three minutes, but in no case exceeding four minutes, from the initial~~

call; no more than 30 seconds after the first responding vehicle(s);

Delete (a)(4) and replace text as follows:

Before operations in less than Standard Visibility are conducted at any aerodrome it should be demonstrated that the Rescue and Fire Fighting Service has the capability to locate a distressed aircraft and operate effectively in the conditions prevailing when such operations are in progress.

Note:

The definition for Standard Visibility is ½ statute mile or 800 metres (2600 feet) RVR.

Add paragraph as follows under (a):

50% of the required foam application rate should be discharged at the end of the third minute.

The remaining vehicles should arrive max 30 seconds later (this means almost 1 km distance behind at top speed)

Enhanced vision or GPS system should be installed, when there are low visibility operations used at the airport.

Justification:

On (a)(1), we believe that early intervention by the aerodrome fire service is one of the most important factors to successfully contain an aircraft fire and therefore ensure the best survival chances for the occupants of the aircraft in a crash situation. The present recommendation calls for a response time not exceeding three minutes and preferably not exceeding two minutes. It is our opinion that there are few airports today which can meet this response time, particularly under adverse operational conditions, with the equipment currently available, with the fire stations as now located and with manpower which often has to respond from other duties. Furthermore, we believe that a three minute period of exposure to the hazard is longer than can be tolerated by the occupants of the aircraft and that two minutes should be the stipulated maximum intervention time. This should be achievable under the most adverse conditions encountered whilst flying is in progress.

On (a)(4) we consider that the NFPA Doc. 403 guideline should be utilised which require that the other rescue and fire fighting vehicles arrive within 30 seconds of the first vehicle.

Reference: IFALPA Annex 14, paragraphs 9.2.23 and 9.2.28.

response

Noted

The Agency decided to follow well established ICAO provisions. However, the proposed AMC aims to urge the aerodrome operators to reduce the response time to two minutes.

comment

1622

comment by: *Geneva International Airport (ROMIG)*

Stick to the exact wording of ICAO 9.2.23 (stick to three minute response time) Should not combine a standard and a recommendation in a single article. This has a huge impact for airports to change from 3 to 2 minutes i.e. additional fire stations and additional firetrucks.

Move the article to GM. If not possible change "movement area" into "manoeuvring area"
This is in excess of the ICAO requirements. The risk on an Apron is also not the same as on the rest of the aerodrome.

response *Partially accepted*

Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment 1648 comment by: Flughafen Linz-Hörsching - LNZ/LOWL

(a)(1) change to:
The operational objective of the rescue and fire fighting service shall be to achieve a response time not exceeding three minutes to any point of each operational runway, in optimum visibility and surface conditions.

(a)(2) delete

(a)(3) change to:
Any vehicles, other than the first responding vehicle(s), required to deliver the amounts of extinguishing agents shall ensure continuous agent application and shall arrive no more than four minutes from the initial call.

(a)(4) delete

add:

Response time is considered to be the time between the initial call to the rescue and fire fighting service, and the time when the first responding vehicle(s) is (are) in position to apply foam at a rate of at least 50 per cent of the discharge rate.

Optimum visibility and surface conditions are defined as daytime, good visibility, no precipitation with normal response route free of surface contamination, e.g. water, ice or snow.

define: first response vehicle(s)

response *Partially accepted*

Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard,

but it includes also the intention to aim for two minutes response time
The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

(a) (3) has been revised to include the requirement that any vehicle other than the first responding vehicles will arrive one minute after them in order to ensure continuous agent application.

comment

1698

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX III — Part-OPS — AMC5-ADR-OPS.B.010 — Response time (p148)

2. Justification and proposed text / comment

This comment is **critical**, as if not changed, AMC5-ADR-OPS.B.010 would require to create new fire stations, which would be too costly.

The current writing of Paragraph (1) of AMC5-ADR-OPS.B.010 is a combination of Annex 14 Volume 1 standard 9.2.23 and recommended practice 9.2.24, and defines 2 minutes as the standard for the response time: according to aerodrome operators, this objective is currently unreachable. But it is reasonable to progressively try to reach this objective. See below the modification proposed by DGAC. A modification of this paragraph is proposed to focus on 3 min, and try to reach 2 min. To complement it, it is proposed to add the fact that the operational objective specified in ADR-OPS.B.010 should be met.

Furthermore, on some aerodromes, the configuration does not allow a response time of three minutes **on each point of the movement area**, especially on distant parking area or on distant taxiways. Applying paragraph (a)(2) of AMC5 would require to create new fire stations, which would be too costly. It is proposed to delete paragraph (a)(2).

The reference to "Table 1" should be replaced by "Table 3" (linked with the comment on AMC4-ADR-OPS.B.010).

Consequently, it is proposed to modify AMC5-ADR-OPS.B.010 as follows:

AMC5-ADR-OPS.B.010 — Response time

~~"(a) The aerodrome operator should ensure establish suitable means, guidance, equipment and/or procedures so that:~~

~~(1) Rescue and fire-fighting service achieve a response time of two in no case exceeding three minutes, but in no case exceeding three minutes, and, as far as practicable, two minutes, to any point of each operational runway, in optimum visibility and surface conditions;~~

~~(2) Rescue and fire-fighting service achieve a response time not exceeding three minutes to any other part of the movement area, in optimum visibility and surface conditions;~~

~~[...]"~~

The reference to "Table 1" should be replaced by "Table 3" (linked with comment on AMC4-ADR-OPS.B.010).

response Partially accepted

The Agency decided to partially accept the proposed wording to set the maximum response time to three minutes with an operational objective not to exceed two minutes.

The Agency decided also instead of deleting (a) (2) to modify the text to include the requirement for the aerodrome operator to assess the response times for the rest of the manoeuvring area and to include these times into the Aerodrome Emergency Plan.

comment 1721 comment by: London Luton Airport Operations Ltd

(a) The aerodrome operator should ensure that:

(1) Rescue and fire-fighting service achieve a response time of two minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions; Consider adding that 50% of required discharge rate is available within response time.

(3) Any vehicle, other than the first responding vehicle(s), required to deliver the amount of extinguishing agents specified in Table 1 of AMC4-ADR-OPS.B.010 achieve continuous agent application and arrive in three minutes, but in no case exceeding four minutes, from the initial call; There is a potential for a gap in media production of 1 minute. The time from the first arriving to backup should be 1 minute.

response Accepted

Text revised accordingly.

comment 1734 comment by: Aéroport de Marseille - MRS/LFML

(a) (1) It is appropriate to modify the (a) (1) of this AMC in the following way : "Rescue and fire-fighting service achieve a response time of ~~two~~ **three** minutes, ~~but in no case exceeding three minutes,~~ to any point of each operational runway, in optimum visibility and surface conditions;" It is appropriate to respect the ICAO Annex 14 normative reference that indicates a response time of 3 min and not the recommendation. Respecting a response time of 2 min is excessively costly in staff, vehicles, or even in buildings whereas the safety benefit is not easy to demonstrate.

(a) (2) It is appropriate to transfer the (a) (2) to GM, modifying it in the following way: « Rescue and fire-fighting service **may** achieve a response time not exceeding three minutes to any other part of the ~~movement~~ **manoeuvring** area, in optimum visibility and surface conditions; » The calculation of response time must be done for the most

response Partially accepted

Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time

The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment

1794 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*
 Attachment [#173](#)
 UAF NPA 2011-20 (B.II) AMC5-ADR-OPS.B.010
 Référence : AMC5-ADR-OPS.B.010
 Response time
 Traduction de courtoisie
 (a) (1) It is appropriate to modify the (a) (1) of this AMC in the following way : "Rescue and fire-fighting service achieve a response time of ~~two~~ **three** minutes, ~~but in no case exceeding three minutes~~, to any point of each operational runway, in optimum visibility and surface conditions;"
 It is appropriate to respect the ICAO Annex 14 normative reference that indicates a response time of 3 min and not the recommendation. Respecting a response time of 2 min is excessively costly in staff, vehicles, or even in buildings whereas the safety benefit is not easy to demonstrate.
 (a) (2) It is appropriate to transfer the (a) (2) to GM, modifying it in the following way: « Rescue and fire-fighting service **may** achieve a response time not exceeding three minutes to any other part of the ~~movement~~ **manoeuvring** area, in optimum visibility and surface conditions; »
 The calculation of response time must be done for the most crucial cases that is to say take-off and landing. Taking into account the manoeuvring area can be a criterion for the installation of fire stations or fire points and it cannot be a criterion to be checked for an aerodrome certification. Otherwise it would lead to expensive changes whereas safety benefit is low.
 The UAF insists particularly on theses changes.

response

Partially accepted
 Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time
 The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment

1871 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*
 Attachment [#174](#)
 ADBM - NPA 2011-20 (B.II) AMC5-ADR-OPS.B.010

Référence : AMC5-ADR-OPS.B.010
Response time

Traduction de courtoisie
(a) (1) It is appropriate to modify the (a) (1) of this AMC in the following way : "Rescue and fire-fighting service achieve a response time of ~~two three~~ **three** minutes, ~~but in no case exceeding three minutes~~, to any point of each operational runway, in optimum visibility and surface conditions;"
It is appropriate to respect the ICAO Annex 14 normative reference that indicates a response time of 3 min and not the recommendation. Respecting a response time of 2 min is excessively costly in staff, vehicles, or even in buildings whereas the safety benefit is not easy to demonstrate.
(a) (2) It is appropriate to transfer the (a) (2) to GM, modifying it in the following way: « Rescue and fire-fighting service **may** achieve a response time not exceeding three minutes to any other part of the **movement manoeuvring** area, in optimum visibility and surface conditions; »
The calculation of response time must be done for the most crucial cases that is to say take-off and landing. Taking into account the manoeuvring area can be a criterion for the installation of fire stations or fire points and it cannot be a criterion to be checked for an aerodrome certification. Otherwise it would lead to expensive changes whereas safety benefit is low.
The ADBM insists particularly on these changes.

response

Partially accepted

Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time
The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment

1889

comment by: Pau Pyrénées Airport - PUF/LFBP

(a) (1) It is appropriate to modify the (a) (1) of this AMC in the following way : "Rescue and fire-fighting service achieve a response time of ~~two three~~ **three** minutes, ~~but in no case exceeding three minutes~~, to any point of each operational runway, in optimum visibility and surface conditions;"
It is appropriate to respect the ICAO Annex 14 normative reference that indicates a response time of 3 min and not the recommendation. Respecting a response time of 2 min is excessively costly in staff, vehicles, or even in buildings whereas the safety benefit is not easy to demonstrate.

(a) (2) It is appropriate to transfer the (a) (2) to GM, modifying it in the following way: « Rescue and fire-fighting service **may** achieve a response time not exceeding three minutes to any other part of the **movement manoeuvring** area, in optimum visibility and surface conditions; »
The calculation of response time must be done for the most crucial cases that is to say take-off and landing. Taking into account the manoeuvring area can be a criterion for the installation of fire stations or fire points and

	<p>it cannot be a criterion to be checked for an aerodrome certification. Otherwise it would lead to expensive changes whereas safety benefit is low.</p> <p>These changes are necessary.</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p>
comment	<p>2001 comment by: <i>Munich Airport International</i></p> <p>(a)</p> <p>(1)(3): stick to the exact wording of ICAO 9.2.23 and 9.2.27</p> <p>Justification: should not combine standard and recommendation. The proposed wording is misleading. Huge impact for airports to change from 3 to 2 minutes</p>
response	<p><i>Partially accepted</i></p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.</p>
comment	<p>2002 comment by: <i>Munich Airport International</i></p> <p>(a)</p> <p>(2): move it to GM! If not possible change "movement area" into "manoeuvring area"</p> <p>Justification: risk profile on aprons</p>
response	<p>Partially accepted</p> <p>The Agency acknowledges the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p>

comment 2026 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*

The ICAOs response time is three minutes, as in 9.2.23 (ICAO Annex 14). The sentence "achieve 2 minutes not to exceed three minutes" is a contradiction and very unclear. EASA should follow the ICAO word for word in this case and not combine standards and recommendations. The parts equivocal to recommendations should be moved to GM. A change to two minutes would place an extremely undue burden on the aerodromes, on finances, on infrastructure, on personell.

response Partially accepted

Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.

comment 2041 comment by: *Shannon Airport*

Consider adding that 50% of required discharge rate is available within the response time.

There is a potential for a gap in media production of 1 minute. The time from the first arriving to backup should be 1 minute.

response Accepted

Text revised accordingly.

comment 2069 comment by: *AENA - Aeropuertos Españoles y Navegación Aérea*

This comment is **critical**, as if not changed, AMC5-ADR-OPS.B.010 would require to create new fire stations, which would be too costly. The current writing of Paragraph (1) of AMC5-ADR-OPS.B.010 is a combination of Annex 14 Volume 1 standard 9.2.23 and recommended practice 9.2.24, and defines 2 minutes as the standard for the response time: according to aerodrome operators, this objective is currently unreachable. But it is reasonable to progressively try to reach this objective. See below the modification proposed. A modification of this paragraph is proposed to focus on 3 min, and try to reach 2 min. To complement it, it is proposed to add the fact that the operational objective specified in ADR-OPS.B.010 should be met.

Furthermore, on some aerodromes, the configuration does not allow a response time of three minutes **on each point of the movement area**, especially on distant parking area or on distant taxiways. Applying paragraph (a)(2) of AMC5 would require to create new fire stations, which would be too costly. It is proposed to delete paragraph (a)(2). Beside in that areas, the accident are not critical.

The reference to "Table 1" should be replaced by "Table 3" (linked with the comment on AMC4-ADR-OPS.B.010).

Consequently, it is proposed to modify AMC5-ADR-OPS.B.010 as

follows:
AMC5-ADR-OPS.B.010 – Response time
 "(a) The aerodrome operator should ~~ensure~~ **establish suitable means, guidance, equipment and/or procedures so that:**
 (1) ~~Rescue and fire-fighting service achieve a response time of two in no case exceeding three minutes, but in no case exceeding three minutes, and, as far as practicable, two minutes, to any point of each operational runway, in optimum visibility and surface conditions;~~
 (2) ~~Rescue and fire-fighting service achieve a response time not exceeding three minutes to any other part of the movement area, in optimum visibility and surface conditions;~~
 [...]"
The reference to "Table 1" should be replaced by "Table 3" (linked with comment on AMC4-ADR-OPS.B.010).

response Partially accepted

The Agency decided to partially accept the proposed wording to set the maximum response time to three minutes with an operational objective not to exceed two minutes.

The Agency decided also instead of deleting (a) (2) to modify the text to include the requirement for the aerodrome operator to assess the response times for the rest of the manoeuvring area and to include these times into the Aerodrome Emergency Plan.

comment 2115 comment by: HIA - Highlands and Islands Airports Limited

AMC5-ADR-OPS.B010 (a) (1) - Response time - the aerodrome operator should ensure that RFFS achieve a response time of 2 minutes but in no case exceeding 3 minutes to any point of each operational runway, in optimum visibility and surface conditions.

AMC5-ADR-OPS.B010 (a) (3) - There is a potential for a gap in media production of one minute.
 Reword - The time from the first arriving vehicle to back up should be one minute.

Consider adding that 50% of required discharge is available within response time

response Accepted

Text revised accordingly.

comment 2198 comment by: Flughafen Klagenfurt

(a)(1) change to:
 The operational objective of the rescue and fire fighting service shall be to achieve a response time not exceeding three minutes to any point of each operational runway, in optimum visibility and surface conditions.
 (a)(2) delete
 (a)(3) change to:
 Any vehicles, other than the first responding vehicle(s), required to deliver the amounts of extinguishing agents shall ensure continuous agent

	<p>application and shall arrive no more than four minutes from the initial call. (a)(4) delete</p> <p>add: Response time is considered to be the time between the initial call to the rescue and fire fighting service, and the time when the first responding vehicle(s) is (are) in position to apply foam at a rate of at least 50 percent of the discharge rate.</p> <p>Optimum visibility and surface conditions are defined as daytime, good visibility, no precipitation with normal response route free of surface contamination, e.g. water, ice or snow.</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time</p> <p>The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p> <p>(a) (3) has been revised to include the requirement that any vehicle other than the first responding vehicles will arrive one minute after them, in order to ensure continuous agent application</p>
comment	<p>2241 comment by: <i>Brussels Airport</i></p> <p>AMC5-ADR-OPS.B.010 (a)(1)&(2)</p> <p>Text to be rewritten</p> <p>Suggested text : Rescue and fire-fighting service achieve a response time not exceeding three minutes to any part of the movement area in optimum visibility and surface conditions;</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time</p> <p>The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p>

comment	<p>2315 comment by: Roskilde Airport</p> <p>Roskilde Airport (EKRK): Clarify that the 3 minutes response time is the actual requirement, and the 2 minutes is a recommendation.</p> <p>Justification: The present wording can seem like a tightening of ICAO annex 14 (in which the 2 minutes are a recommendation - not a requirement). It will mean a major cost increase for many aerodromes if they should change to 2 minutes on all RWY's. The 2011-020 RIA (page 82) states that the EASA has decided to adopt ICAO's SARPS on the response time, so the actual rules should reflect that clearly and unambiguously.</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time. The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.</p>

comment	<p>2325 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Référence : AMC5-ADR-OPS.B.010</th> <th style="text-align: left;">Response time</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;">Proposition/commentaire</td> <td> <p>(a) (1) Il convient de modifier le (a) (1) de cet AMC de la manière suivante: "Rescue and fire-fighting service achieve a response time of two three minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions;"</p> <p>(a) (2) Il convient de transférer le (a) (2) en GM en le modifiant de la manière suivante : « Rescue and fire-fighting service may achieve a response time not exceeding three minutes to any other part of the movement manoeuvring area, in optimum visibility and surface conditions; »</p> <p>ACA insiste particulièrement sur ces changements.</p> </td> </tr> <tr> <td style="vertical-align: top;">Justification</td> <td> <p>Il convient de respecter la norme de l'Annexe 14 de l'OACI qui indique un objectif opérationnel de 3 minutes et non la recommandation. Respecter un objectif opérationnel de 2 minutes est excessivement coûteux en personnel,</p> </td> </tr> </tbody> </table>	Référence : AMC5-ADR-OPS.B.010	Response time	Proposition/commentaire	<p>(a) (1) Il convient de modifier le (a) (1) de cet AMC de la manière suivante: "Rescue and fire-fighting service achieve a response time of two three minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions;"</p> <p>(a) (2) Il convient de transférer le (a) (2) en GM en le modifiant de la manière suivante : « Rescue and fire-fighting service may achieve a response time not exceeding three minutes to any other part of the movement manoeuvring area, in optimum visibility and surface conditions; »</p> <p>ACA insiste particulièrement sur ces changements.</p>	Justification	<p>Il convient de respecter la norme de l'Annexe 14 de l'OACI qui indique un objectif opérationnel de 3 minutes et non la recommandation. Respecter un objectif opérationnel de 2 minutes est excessivement coûteux en personnel,</p>
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Justification	<p>Il convient de respecter la norme de l'Annexe 14 de l'OACI qui indique un objectif opérationnel de 3 minutes et non la recommandation. Respecter un objectif opérationnel de 2 minutes est excessivement coûteux en personnel,</p>						

	<p>véhicules voire en bâtiments pour un gain de sécurité loin d'être évident à démontrer.</p> <p>Le calcul de l'objectif opérationnel doit se faire pour les cas les plus cruciaux c'est-à-dire l'atterrissage et le décollage. Prendre en compte l'aire de manœuvre peut être un critère pour l'installation des casernes de pompiers ou postes d'incendie mais ne doit pas être un critère à vérifier dans le cadre d'une certification d'aérodrome. Sinon, cela entrainerait des changements avec des coûts significatifs pour un gain de sécurité faible.</p>
<p>Traduction de courtoisie</p>	<p>(a) (1) It is appropriate to modify the (a) (1) of this AMC in the following way : "Rescue and fire-fighting service achieve a response time of two three minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions;" It is appropriate to respect the ICAO Annex 14 normative reference that indicates a response time of 3 min and not the recommendation. Respecting a response time of 2 min is excessively costly in staff, vehicles, or even in buildings whereas the safety benefit is not easy to demonstrate.</p> <p>(a) (2) It is appropriate to transfer the (a) (2) to GM, modifying it in the following way: « Rescue and fire-fighting service may achieve a response time not exceeding three minutes to any other part of the movement manoeuvring area, in optimum visibility and surface conditions; » The calculation of response time must be done for the most crucial cases that is to say take-off and landing. Taking into account the manoeuvring area can be a criterion for the installation of fire stations or fire points and it cannot be a criterion to be checked for an aerodrome certification. Otherwise it would lead to expensive changes whereas safety benefit is low.</p> <p>ACA insists particularly on theses changes.</p>
<p>response</p>	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard,</p>

but it includes also the intention to aim for two minutes' response time
 The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment 2379 comment by: *Norwich International Airport*

AMC5-ADR-OPS.B.010 — Response time
 (a) The aerodrome operator should ensure that:

(1) Rescue and fire-fighting service achieve a response time of two minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions;

Consider adding that 50% of required discharge rate is available within response time.

(3) Any vehicle, other than the first responding vehicle(s), required to deliver the amount of extinguishing agents specified in Table 1 of AMC4-ADR-OPS.B.010 achieve continuous agent application and arrive in three minutes, but in no case exceeding four minutes, from the initial call;

There is a potential for a gap in media production of 1 minute. The time from the first arriving to backup should be 1 minute.

response Accepted
 Text revised accordingly.

comment 2388 comment by: *Aéroports De Lyon*

Respecter un objectif opérationnel de 2 minutes est excessivement coûteux en personnel, véhicules voire en bâtiment pour un gain de sécurité loin d'être évident à démontrer. Pourquoi être plus restrictif que l'OACI?

Proposition: Remplacer 2 minutes par 3 minutes + Déplacer en GM

response Partially accepted

Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time
 The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.

comment 2389 comment by: *Glasgow Prestwick*

response	<p>consider adding in position and producing 50% discharge rate in table 1</p> <p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2425 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(a) (1) Consider adding that 50% of required discharge rate is available within response time.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2426 comment by: <i>East Midlands Airport - EMA/EGNX</i></p> <p>(a) (3) There is a potential for a gap in media production of 1 minute. The time for the first arriving to backup should be 1 minute.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2429 comment by: <i>Aberdeen Airport</i></p> <p>Paragraph number (3) could potentially result in a break in media application. Consideration should be given to stipulating time from first arriving to back up should be 1 minute.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2433 comment by: <i>SEARD - Societe d'exploitation des Aeroports de Rennes et Dinard</i></p> <p>Attachment #175</p> <p>SEARD NPA 2011-20 (B.II) AMC5-ADR-OPS.B.010</p> <p>Référence : AMC5-ADR-OPS.B.010 Response time</p> <p>Traduction de courtoisie</p> <p>(a) (1) It is appropriate to modify the (a) (1) of this AMC in the following way : "Rescue and fire-fighting service achieve a response time of two three minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions;" It is appropriate to respect the ICAO Annex 14 normative reference that indicates a response time of 3 min and not the recommendation. Respecting a response time of 2 min is excessively costly in staff, vehicles, or even in buildings whereas the safety benefit is not easy to demonstrate.</p> <p>(a) (2) It is appropriate to transfer the (a) (2) to GM, modifying it in the following way: « Rescue and fire-fighting service may achieve a response time not exceeding three minutes to any other part of the movement</p>

	<p>manoeuvring area, in optimum visibility and surface conditions; » The calculation of response time must be done for the most crucial cases that is to say take-off and landing. Taking into account the manoeuvring area can be a criterion for the installation of fire stations or fire points and it cannot be a criterion to be checked for an aerodrome certification. Otherwise it would lead to expensive changes whereas safety benefit is low. The SEARD insists particularly on these changes.</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time The Agency acknowledges also the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.</p>
comment	<p>2473 comment by: <i>Isavia</i></p> <p>We suggest to change the beginning of this sentence to: "During flight operations, competent personnel is" This reflects suggested changes in ICAO State Letter (AN 4/1.152 - 11/41) to Annex 14; 9.2.40. (Response time not exceeding 3 min.)</p>
response	<p>Noted</p> <p>The Agency decided not to follow the proposals included in ICAO SL41-2011 since they haven't been finalised yet.</p>
comment	<p>2487 comment by: <i>DAA Cork Airport</i></p> <p>(a) (1) - Consider adding that 50% of required discharge rate is available within the response time.</p> <p>There is a potential for a gap in media production of 1 minute. The time from the first arriving to backup should be 1 minute.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2502 comment by: <i>NTL Luftfarten</i></p> <p>AMC5-ADR-OPS.B.010 – Response time (a) The aerodrome operator should ensure that: (1) Rescue and fire-fighting service achieve a response time of 90 seconds two minutes, but in no case exceeding two three minutes, to any point of each operational runway, in optimum visibility and surface conditions; (2) Rescue and fire-fighting service achieve a response time not exceeding</p>

~~two three~~ minutes to any other part of the movement area, in optimum visibility and surface conditions;

(3) Any vehicle, other than the first responding vehicle(s), required to deliver the amount of extinguishing agents specified in Table 1 of AMC4-ADR-OPS.B.010 achieve continuous agent application and arrive **no more than one minute after the first responding vehicle(s)**. ~~in three minutes, but in no case exceeding four minutes, from the initial call;~~

(4) Suitable guidance, equipment and/or procedures for rescue and fire-fighting services are provided, to meet the operational objective as nearly as possible in less than optimum conditions of visibility, especially during low visibility operations.

New text will be as follows:

(a) The aerodrome operator should ensure that:

(1) Rescue and fire-fighting service achieve a response time of 90 seconds, but in no case exceeding two, to any point of each operational runway, in optimum visibility and surface conditions;

(2) Rescue and fire-fighting service achieve a response time not exceeding two minutes to any other part of the movement area, in optimum visibility and surface conditions;

(3) Any vehicle, other than the first responding vehicle(s), required to deliver the amount of extinguishing agents specified in Table 1 of AMC4-ADR-OPS.B.010 achieve continuous agent application and arrive no more than one minute after the first responding vehicle(s).

(4) Suitable guidance, equipment and/or procedures for rescue and fire-fighting services are provided, to meet the operational objective as nearly as possible in less than optimum conditions of visibility, especially during low visibility operations.

response Partially accepted

For (a) (1) the Agency decided to follow ICAO provisions, while for (a) (2) a requirement for the aerodrome operator to measure the response times for the rest of the movement area, and include this in the Aerodrome Emergency Plan has been defined.
 For (a) (3) the proposal is accepted and the text is revised accordingly.

comment 2568 comment by: *ADV -German Airports Association*

ACM5.ADR.OPS.B.010 (a) (1), (3)
 stick to the exact wording of ICAO 9.2.23 and 9.2.27

Justification
 should not combine standard and recommendation. The proposed wording is misleading. Huge impact for airports to change from 3 to 2 minutes

response *Partially accepted*

Many European Airports have already achieved a two minutes' response time, while on the other hand many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes' response time

The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.

comment 2569 comment by: *ADV -German Airports Association*
ACM5.ADR.OPS.B.010 (a) (2)
move it to GM! If not possible change "movement area" into "manoeuvring area"
Justification
risk profile on aprons

response Partially accepted
The Agency acknowledges the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

comment 2594 comment by: *EAL AFS - Edinburgh Airport*
AMC5-ADR-OPS.B.010 — Response time
(a) The aerodrome operator should ensure that:
(1) Rescue and fire-fighting service achieve a response time of two minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions; Consider adding that 50% of required discharge rate is available within response time.
(3) Any vehicle, other than the first responding vehicle(s), required to deliver the amount of extinguishing agents specified in Table 1 of AMC4-ADR-OPS.B.010 achieve continuous agent application and arrive in three minutes, but in no case exceeding four minutes, from the initial call. There is a potential for a gap in media production of 1 minute. The time from the first arriving to backup should be 1 minute.

response Accepted
Text revised accordingly.

comment 2608 comment by: *Stansted Airport - Daren BARTHAM*
AMC5-ADR-OPS.B.010 — Response time
(a) The aerodrome operator should ensure that:
(1) Rescue and fire-fighting service achieve a response time of two minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions; Consider adding that 50% of required discharge rate is available within response time.

response	<p>(3) Any vehicle, other than the first responding vehicle(s), required to deliver the amount of extinguishing agents specified in Table 1 of AMC4-ADR-OPS.B.010 achieve continuous agent application and arrive in three minutes, but in no case exceeding four minutes, from the initial call; There is a potential for a gap in media production of 1 minute. The time from the first arriving to backup should be 1 minute.</p> <p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2668 comment by: <i>Fraport AG</i></p> <p>AMC5-ADR-OPS.B.010 — Response time (a) (1)</p> <p>Editorial</p> <p>Rescue and fire-fighting service achieve a response time of two minutes, but in no case exceeding three minutes, to any point of each operational runway, in optimum visibility and surface conditions;</p> <p>stick to the exact wording of ICAO 9.2.23, (stick to 3 minutes response time)</p> <p>Fraport AG Do not combine standards and recommendations! Huge impact for airports to change from 3 to 2 minutes, i.e. additional fire stations may be needed to achieve the AMC</p>
response	<p>Partially accepted</p> <p>Many European Airports have already achieved a two minutes' response time, while on the other hand, many more airports are still following ICAO Standard. The proposal has been revised in order to meet ICAO Standard, but it includes also the intention to aim for two minutes response time The intention is not to add additional burden to aerodromes other than those required by ICAO. However, the proposed AMC aims also to improve the response time.</p>
comment	<p>2669 comment by: <i>Fraport AG</i></p> <p>AMC5-ADR-OPS.B.010 — Response time (a) (2)</p> <p>Editorial</p> <p>Rescue and fire-fighting service achieve a response time not exceeding three minutes to any other part of the movement area, in optimum visibility and surface conditions;</p> <p>Move GM; to If not possible change "movement area" into "manoeuvring area"</p> <p>Fraport AG risk profile on aprons</p>

response Partially accepted

The Agency acknowledges the fact that including ICAO Annex 14, 9.2.25 Recommendation into the AMC will might necessitate the construction or relocation of existing fire stations. On the other hand, it is very important for the aerodrome operator to know the response time to various parts of the movement area other than the runways. For that reason, point (a) (2) is revised to include this requirement.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC6-ADR-OPS.B.010 – Personnel p. 148

comment 236 comment by: BAA

Please include the requirement to determine the number of personnel needed using a Task and Resource Analysis.

response Partially accepted

The proposal has been included in GM2-ADR.OPS.B.010

comment 237 comment by: BAA

(a)(1) - RFFS personnel must be available for a period of 15 minutes after the last aircraft has departed.

response Accepted

Text revised accordingly.

comment 238 comment by: BAA

In some cases, RFFS personnel provide other services at their airport. Please include a requirement that states that extra duties must not impede an RFFS response to an incident.

response Accepted

New point (a) (4) has been proposed.

comment 332 comment by: Belfast International Airport - BFS/EGAA

Consider adding after flight operations "and 15 minutes after departure".

Consider adding requirement for personnel to be determined by a Task and Resource Analysis.

response Partially accepted

For the first comment, a new point (a) (4) has been proposed
The second comment has been considered in GM2-ADR.OPS.B.010.

comment 526 comment by: CTIF The International Fire and Rescue Organization -

	<i>Airport Commission</i>
	This means that the Airport have to have personnell who work with breathing apparatus. This have to be written more clearly on rescue and fire fighting services.
response	Noted The requirement comes from ICAO Annex 14, 9.2.42 Standard. The intention is to ensure that protective equipment and respiratory equipment are available for use.
comment	618 comment by: <i>BAA Glasgow</i> (1) Consider adding - after flight operations "and 15 minutes after departure". Consider adding - the requirement for the number of personnel to be determined by a Task and Resource Analysis.
response	Partially accepted For the first comment, a new point (a) (4) has been proposed. The second commend has been considered in GM2-ADR.OPS.B.010.
comment	816 comment by: <i>Dublin Airport Authority</i> Ref (a)-(1) Consider adding after flight operations: "and minimum 15 minutes after departure." Consider adding requirement for personnel to be determined by a Task and Resource Analysis.
response	Partially accepted For the first comment, a new point (a) (4) has been proposed. The second commend has been considered in GM2-ADR.OPS.B.010.
comment	1361 comment by: <i>UK CAA</i> Page No: 148 Paragraph No: AMC6-ADR-OPS.B010 (a)(1) Comment: Sufficient trained personnel should be determined by a Task and Resource Analysis. Justification: It is considered essential that the personnel available are in accordance with the Task and Resource Analysis for the aerodrome including supervisory staff. Proposed Text: Add in first line "...sufficient trained personnel, in accordance with the RFFS Task and Resource Analysis , is detailed

	and ready...”
response	Partially accepted The proposal has been included in GM2-ADR.OPS.B.010.
comment	1364 comment by: UK CAA Page No: 148 Paragraph No: AMC6-ADR-OPS.B.010 (a) (1) Comment: The RFFS needs to remain available within the first 15 minutes of a flight in case the aircraft has to return. Justification: If an incident or situation occurs during the first 15 minutes of a flight it is reasonable to expect that returning flight to have adequate RFFS cover, especially as it may be required. Proposed Text: “During flight operations and 15 minutes after departure,... ”
response	Accepted Text revised accordingly.
comment	1367 comment by: UK CAA Page No: 148 Paragraph No: AMC6-ADR-OPS.B.010 Comment: Where rescue and fire-fighting personnel are used for other duties their response to an incident and their safety should not be compromised by those other duties. Justification: Whilst it is accepted that in many instances rescue and fire-fighting personnel can be used in other roles and still respond to an incident in a timely manner it should be clear that those other duties must not compromise that response and the duties should not affect their safety. For example fuelling operations wearing fire fighting Personal Protective Equipment (PPE). Proposed Text: add Item (4) “Any other duties carried out by rescue and fire-fighting personnel do not compromise the response or their safety.”
response	Accepted Text revised accordingly.
comment	1566 comment by: ECA - European Cockpit Association Add following paragraphs: (4) A person should be appointed to direct the aerodrome rescue and fire fighting services. The responsibilities of this person should include overall

administrative supervision of the organisation, effective training of personnel and operational control of emergencies involving aircraft within the aerodrome jurisdiction.

(5) All rescue and fire fighting personnel should meet the requirements of NFPA 1003 'Standard for Airport Fire Fighting Professional Qualifications'.

(6) All rescue and fire fighting and other authorised personnel should be given suitable uniforms or identifying insignia to prevent any misunderstanding as to their right to be in the fire area or the aircraft movement area of an aerodrome during an emergency.

(7) Approved protective clothing and equipment, including protective coat, protective trousers, helmet, gloves and self contained breathing apparatus (SCBA), should be provided, maintained, and readily available for use by all rescue and fire fighting personnel."

(8) SCBA for rescue and fire fighting personnel should meet the requirements of NFPA 1981 'Standard for Self Contained Breathing Apparatus for Fire Fighters.'

(9) Station/work uniforms worn by rescue and fire fighting personnel should meet the requirements of NFPA 1975' Standard on Station/Work Uniforms for Fire Fighters'.

(10) Other than rescue and fire fighting vehicle driver/operators, all rescue and fire fighting personnel engaged in any rescue or fire fighting operation should wear complete protective clothing, including SCBA, and should not remove any protective clothing or SCBA until they are in a safe area and so directed by the officer in charge.

Justification:

Self-explanatory. These requirements are basic, if we want to have an effective RFF, clear rules need to be applied.

Reference: IFALPA Annex 14, paragraphs 9.2.40.x; 9.2.40.y; 9.2.42.x; 9.2.42.y; 9.2.42.z; 9.2.42.xx; 9.2.42.yy.

response

Noted

The Agency at this stage decided to incorporate into the proposed rules and AMC well established ICAO material. However, all these proposals will be taken into consideration in future rulemaking tasks.

comment

1722

comment by: *London Luton Airport Operations Ltd*

(a) The aerodrome operator should ensure that:

(1) During flight operations, sufficient trained personnel is detailed and readily available to ride the rescue and fire-fighting vehicles and to operate the equipment at maximum capacity **Consider adding after flight operations "and 15 minutes after departure". Consider adding requirement for personnel to be determined by a Task and Resource Analysis.**

response

Partially accepted

For the first comment, a new point (a) (4) has been proposed.
 The second comment has been considered in GM2-ADR.OPS.B.010.

comment 1922 comment by: *Dublin Airport Authority*
 Consider adding after flight operations: "and minimum 15 minutes after departure."
 response Accepted
 Text revised accordingly.

comment 1924 comment by: *Dublin Airport Authority*
 Consider expanding to include provision of cover during aircraft start-up and taxiing.
 response Noted
 Aircraft start-up and taxiing are considered flight operations.

comment 2042 comment by: *Shannon Airport*
 Consider adding after flight operations: "and minimum 15 minutes after departure."
 Consider adding requirement for personnel to be determined by a Task and Resource Analysis
 response Partially accepted
 The first comment is accepted.
 The second comment has been considered in GM2-ADR.OPS.B.010.

comment 2117 comment by: *HIA - Highlands and Islands Airports Limited*
 AMC6-ADR-OPS.B010 (a) (1) - Consider adding after flight operations... and 15 minutes after departure and also consider adding requirement for personnel to be determined by task and resource analysis
 response Partially accepted
 The first comment is accepted.
 The second comment has been considered in GM2-ADR.OPS.B.010.

comment 2246 comment by: *SWISS AERODROMES ASSOCIATION*
 This is another example of AMC combining excessive requirements:
 letter a) para 1): to operate the equipment does not mean to operate it at maximum capacity,
 letter a) para 3) : the requirement for respiratory equipment is not necessary.
 response Not accepted

(a) (1): The purpose of this proposal is to ensure that the equipment is appropriately manned, in order to achieve full functioning.
 (a) (3): This is an ICAO Standard.

comment	2253	comment by: <i>IDRF e.V. (association of regional airports)</i>
	(a) (3): A requirement for respiratory equipment at small aerodromes is not adequate and unusual.	
response	Not accepted	
	(a) (3) is an ICAO Standard.	

comment	2390	comment by: <i>Glasgow Prestwick</i>
	consider adding after flight operations "and 15 mins after departure" Personnel to be determined by review of task resource analysis	
response	Partially accepted	
	The first comment is accepted. The second comment has been considered in GM2-ADR.OPS.B.010.	

comment	2488	comment by: <i>DAA Cork Airport</i>
	(a) (1) - Consider adding after flight operations: "and minimum 15 minutes after departure." Consider adding requirement for personnel to be determined by a Task and Resource Analysis.	
response	Partially accepted	
	The first comment is accepted. The second comment has been considered in GM2-ADR.OPS.B.010.	

comment	2595	comment by: <i>EAL AFS - Edinburgh Airport</i>
	AMC6-ADR-OPS.B.010	Personnel
	(a) The aerodrome operator should ensure that: (1) During flight operations, sufficient trained personnel is detailed and readily available to ride the rescue and fire-fighting vehicles and to operate the equipment at maximum capacity. Consider adding after flight operations "and 15 minutes after departure". Consider adding requirement for personnel to be determined by a Task and Resource Analysis.	
response	Partially accepted	
	The first comment is accepted.	

The second comment has been considered in GM2-ADR.OPS.B.010.

comment	2609 comment by: <i>Stansted Airport - Daren BARTHAM</i> AMC6-ADR-OPS.B.010 — Personnel (a) The aerodrome operator should ensure that: (1) During flight operations, sufficient trained personnel is detailed and readily available to ride the rescue and fire-fighting vehicles and to operate the equipment at maximum capacity Consider adding after flight operations "and 15 minutes after departure". Consider adding requirement for personnel to be determined by a Task and Resource Analysis.
response	Partially accepted The first comment is accepted. The second comment has been considered in GM2-ADR.OPS.B.010.

**NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS —
SUBPART B — AERODROME OPERATIONAL SERVICES, EQUIPMENT
AND INSTALLATIONS (ADR.OPS.B) — AMC7-ADR-OPS.B.010 —
Training of RFFS personnel**

p. 148-149

comment	515 comment by: <i>CTIF The International Fire and Rescue Organization - Airport Commission</i> (a) Minimum once a year: to -establish a common rapid acting of the personnel, Operating Procedures must be created in accordance to the aircraft category the airport is classified (b-The Operating Procedures must show the tasks of each fire fighting personnel in a timely coordination to ensure a short deployment time. (c-a worst case scenario (a rapid inside fire attack, with usage of a ladder) for the largest aircraft in the classified airport category must be part of this procedures (d-Operating Procedures are to create having regard to industrial safety, other training guidelines and operation manuals of equipment A responsible fire training school or a certified assessor shall consult the verification of procedures and tasks and the redaction of the complete Manual to ensure safe working
response	Noted The proposals are not related to training. The Agency decided to follow ICAO proposals concerning RFFS personnel training requirements.
comment	2170 comment by: <i>ECA - European Cockpit Association</i> Comment: These rules are not specific enough. They don't not reply to basic questions such as:

What is the frequency of live fire drill? Twice annually is recommended.
 What is the minimum hour for initial training and for recurrent training?

There are, among others, missing training subjects:

- Emergency first aid,
- Driver training,
- Cargo aircraft,
- Rescue, tools and forcible entry,

- Communication to flight crew, including hand signals

Regulations for vehicles are missing, such as: all terrain capabilities, pump and roll capability, lighting requirements, turret and bumper turret range and capability requirements, acceleration and braking, ground pressure. Regulations for emergency medical aid at airport emergencies are missing. Full emergency and local standby has to be regulated.

As stated in another comment, RFFS requirements are not specific enough.

response Noted

comment

2474

comment by: *Isavia*

Training of Rescue and Fire Fighting Personnel
 Suggest to elevate to AMC.

response Noted

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
 – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
 INSTALLATIONS (ADR.OPS.B) – AMC8-ADR-OPS.B.010 – Medical
 standards for RFFS personnel**

p. 149

comment

220

comment by: *KLM*

Change

Either a standard is provided to ensure a common standard or delete this text as it says nothing.

When no requirements are specified and it is left up to the aerodrome operator, this is a meaning less requirement and therefore obsolete. When certain medical requirements are expected to be met these have to be specified here.

response Noted

comment

724

comment by: *ADP : Aeroports de Paris*

Référence : AMC8-ADR- Medical standards for RFFS personnel

OPS.B.010	
Proposition/commentaire	Il convient de modifier de la manière suivante: "The aerodrome operator should determine /ensure an appropriate medical standard to be met by RFF personnel."
Justification	Ce n'est pas à l'exploitant d'aérodrome de déterminer les normes médicales appropriées mais aux autorités. En revanche, l'exploitant d'aérodrome peut veiller à ce que son personnel respecte les règles médicales appropriées.
Traduction de courtoisie	It is appropriate to modify in the following way: "The aerodrome operator should determine /ensure an appropriate medical standard to be met by RFF personnel." It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.

response

Accepted
Text revised accordingly.

comment

972 comment by: *Union des Aéroports français - UAF*
Attachment [#176](#)
UAF NPA 2011-20 (B.II) AMC8-ADR-OPS.B.010
Référence : AMC8-ADR-OPS.B.010
Medical standards for RFFS personnel
Traduction de courtoisie
It is appropriate to modify in the following way: "The aerodrome operator should ~~determine~~/ensure an appropriate medical standard to be met by RFF personnel."
It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities.
Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.

response

Accepted
Text revised accordingly.

comment

1228 comment by: *Airport Nuremberg - NUE/EDDN*

The medical standard cannot be determined by the aerodrome operator, since there is already national legislation and recommendations dealing with that matter. Since this AMC claims the medical standard to be individually established by the respective aerodrome, it must be moved to guidance material.

response Partially accepted

Text has been revised and the responsibility of the aerodrome operator is to 'ensure' rather than to 'determine'.

comment 1382 comment by: *Euroairport Bâle-Mulhouse*

Attachment [#177](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC8-ADR-OPS.B.010

Référence : AMC8-ADR-OPS.B.010
 Medical standards for RFFS personnel

Traduction de courtoisie
 It is appropriate to modify in the following way: "The aerodrome operator should ~~determine~~/ensure an appropriate medical standard to be met by RFF personnel."
 It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.

response Accepted

Text revised accordingly.

comment 1735 comment by: *Aéroport de Marseille - MRS/LFML*

It is appropriate to modify in the following way: "The aerodrome operator should ~~determine~~/ensure an appropriate medical standard to be met by RFF personnel."
 It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.

response Accepted

Text revised accordingly.

comment 1796 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#178](#)

UAF NPA 2011-20 (B.II) AMC8-ADR-OPS.B.010

Référence : AMC8-ADR-OPS.B.010
 Medical standards for RFFS personnel

	<p>Traduction de courtoisie It is appropriate to modify in the following way: "The aerodrome operator should determine/ensure an appropriate medical standard to be met by RFF personnel." It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.</p>
response	<p>Accepted Text revised accordingly.</p>

comment	<p>1845 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #179</p> <p>ADBM - NPA 2011-20 (B.II) AMC8-ADR-OPS.B.010</p> <p>Référence : AMC8-ADR-OPS.B.010 Medical standards for RFFS personnel</p> <p>Traduction de courtoisie It is appropriate to modify in the following way: "The aerodrome operator should determine/ensure an appropriate medical standard to be met by RFF personnel." It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.</p>
response	<p>Accepted Text revised accordingly.</p>

comment	<p>1852 comment by: <i>Aeroport Paris Vatry - XCR/LFOK</i></p> <p>Attachment #180</p> <p>NPA 2011-20 (B.II) AMC8-ADR-OPS.B.010</p> <p>Référence : AMC8-ADR-OPS.B.010 Medical standards for RFFS personnel</p> <p>Traduction de courtoisie It is appropriate to modify in the following way: "The aerodrome operator should determine/ensure an appropriate medical standard to be met by RFF personnel." It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.</p>
response	<p>Accepted Text revised accordingly.</p>

comment	<p>1886 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to modify in the following way: "The aerodrome operator should determine/ensure an appropriate medical standard to be met by RFF personnel."</p> <p>It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator must ensure that his/her staff respects the appropriate medical rules.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>

comment	<p>1979 comment by: <i>Tarbes-Lourdes-Pyrénées airport</i></p> <p>Attachment #181</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 25%;">NPA</td> <td style="width: 25%;">2011-20</td> <td style="width: 25%;">(B.II)</td> <td style="width: 25%;">AMC8-ADR-OPS.B.010</td> </tr> <tr> <td>Référence</td> <td>:</td> <td></td> <td>AMC8-ADR-OPS.B.010</td> </tr> <tr> <td>Medical standards</td> <td>for</td> <td>RFFS</td> <td>personnel</td> </tr> </table> <p>Traduction de courtoisie</p> <p>It is appropriate to modify in the following way: "The aerodrome operator should determine/ensure an appropriate medical standard to be met by RFF personnel."</p> <p>It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.</p>	NPA	2011-20	(B.II)	AMC8-ADR-OPS.B.010	Référence	:		AMC8-ADR-OPS.B.010	Medical standards	for	RFFS	personnel
NPA	2011-20	(B.II)	AMC8-ADR-OPS.B.010										
Référence	:		AMC8-ADR-OPS.B.010										
Medical standards	for	RFFS	personnel										
response	<p>Accepted</p> <p>Text revised accordingly.</p>												

comment	<p>2086 comment by: <i>IATA</i></p> <p>AMC8-ADR-OPS.B.010 – Medical standards for RFFS personnel</p> <p>Change</p> <p>Either a standard is provided to ensure a common standard or delete this text as it says nothing.</p> <p>When no requirements are specified and it is left up to the aerodrome operator, this is a meaning less requirement and therefore obsolete. When certain medical requirements are expected to be met these have to be specified here.</p>
response	<p>Noted</p>

comment	<p>2327 comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i></p>
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Référence : AMC8-ADR-OPS.B.010	Medical standards for RFFS personnel
Proposition/commentaire	Il convient de modifier de la manière suivante: "The aerodrome operator should determine /ensure an appropriate medical standard to be met by RFF personnel."
Justification	Ce n'est pas à l'exploitant d'aérodrome de déterminer les normes médicales appropriées mais aux autorités. En revanche, l'exploitant d'aérodrome peut veiller à ce que son personnel respecte les règles médicales appropriées.
Traduction de courtoisie	It is appropriate to modify in the following way: "The aerodrome operator should determine /ensure an appropriate medical standard to be met by RFF personnel." It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.

response

Accepted
Text revised accordingly.

comment

2509 comment by: AEA - Association of European Airlines

AMC8-ADR-OPS.B.010 – Medical standards for RFFS personnel
The aerodrome operator should determine/ensure an appropriate medical standard to be met by RFF personnel.

Comments

Change

Either a standard is provided to ensure a common standard or delete this text as it says nothing.

When no requirements are specified and it is left up to the aerodrome operator, this is a meaning less requirement and therefore obsolete.
When certain medical requirements are expected to be met these have to be specified here.

response

Noted

comment

2678 comment by: ATB Aéroport Toulouse-Blagnac - TLS/LFBO

Attachment #182				
ATB	NPA	2011-20	(B.II)	AMC8-ADR-OPS.B.010
Référence Medical		standards	:	AMC8-ADR-OPS.B.010 RFFS personnel
Traduction de courtoisie It is appropriate to modify in the following way: "The aerodrome operator should determine /ensure an appropriate medical standard to be met by RFF personnel." It is not to the aerodrome operator to determine an appropriate medical standard to be met by RFF personnel but to the authorities. Nevertheless the aerodrome operator can ensure that his/her staff respects the appropriate medical rules.				
response	Accepted Text revised accordingly.			

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM1-ADR-OPS.B.010 – Availability of rescue and fire-fighting services</p>	p. 149
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comment	817	comment by: <i>Dublin Airport Authority</i>
	This can only be considered an Acceptable Means of Compliance following consideration of likely extraneous duties that might compromise individual or crew performance or response times.	
response	Noted The aerodrome operator is responsible to ensure that rescue and firefighting services are provided at the aerodrome. The intention of this GM is to assist the aerodrome operation on its decision concerning the provider of this service.	
comment	2043	comment by: <i>Shannon Airport</i>
	This can only be considered an Acceptable Means of Compliance following consideration of likely extraneous duties that might compromise individual or crew performance or response times.	
response	Noted The aerodrome operator is responsible to ensure that rescue and firefighting services are provided at the aerodrome. The intention of this GM is to assist the aerodrome operation on its decision concerning the provider of this service.	
comment	2490	comment by: <i>DAA Cork Airport</i>
	This can only be considered an Acceptable Means of Compliance following	

	consideration of likely extraneous duties that might compromise individual or crew performance or response times.
response	Noted The aerodrome operator is responsible to ensure that rescue and firefighting services are provided at the aerodrome. The intention of this GM is to assist the aerodrome operation on its decision concerning the provider of this service.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – GM2-ADR-OPS.B.010 –
Communication System**

p. 149

comment	239	comment by: BAA
	Is GM the right level for this? Given the importance of communication at all incidents, I believe that this information should be upgraded.	
response	Accepted Text moved to AMC1-ADR.OPS.B.010.	
comment	240	comment by: BAA
	(a)- no mention is made of the need to record communications between the RFFS and flight crew. This is an important matter and should be included in the guidance.	
response	Accepted Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.	
comment	241	comment by: BAA
	Please include a requirement covering the provision of communications equipment to RFFS personnel.	
response	Accepted Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.	
comment	266	comment by: CAA Norway
	Editorial: The sentences in GM2-ADR-OPS.B.010 on page 149 seem to be missing an intro.	
response	Accepted Text revised.	

comment	<p>285 comment by: <i>Manchester Airport plc</i></p> <p>(c) Add item (d) " Communication between crew members should be provided".</p>				
response	<p>Accepted</p> <p>Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010</p>				
comment	<p>503 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>Editorial: The sentences in GM2-ADR-OPS.B.010 on page 149 seem to be missing an intro.</p>				
response	<p>Accepted</p> <p>Text revised.</p>				
comment	<p>530 comment by: <i>CTIF The International Fire and Rescue Organization - Airport Commission</i></p> <p>This is a good princip for successfull working at the accident site. Language could be a problem at some airports in communication.</p>				
response	<p>Noted</p>				
comment	<p>619 comment by: <i>BAA Glasgow</i></p> <p>(C) Consider addition - "Communication between crew members should be provided." Consider addition - "A system for monitoring the movement area for incidents should be provided."</p>				
response	<p>Accepted</p> <p>Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.</p>				
comment	<p>727 comment by: <i>ADP : Aeroports de Paris</i></p> <table border="1" data-bbox="386 1594 1398 2004"> <tr> <td data-bbox="386 1594 804 1675">Référence : GM2-ADR-OPS.B.010</td> <td data-bbox="804 1594 1398 1675">Communication System</td> </tr> <tr> <td data-bbox="386 1675 804 2004">Proposition/commentaire</td> <td data-bbox="804 1675 1398 2004"> <p>Il convient d'apporter les modifications suivantes: "(a) Communication means are may be provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency; (b) Communication means are may be provided to ensure allow the immediate summoning of designated personnel not</p> </td> </tr> </table>	Référence : GM2-ADR-OPS.B.010	Communication System	Proposition/commentaire	<p>Il convient d'apporter les modifications suivantes: "(a) Communication means are may be provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency; (b) Communication means are may be provided to ensure allow the immediate summoning of designated personnel not</p>
Référence : GM2-ADR-OPS.B.010	Communication System				
Proposition/commentaire	<p>Il convient d'apporter les modifications suivantes: "(a) Communication means are may be provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency; (b) Communication means are may be provided to ensure allow the immediate summoning of designated personnel not</p>				

	<p>on standby duty; (c) Communication means are may be provided to ensure allow two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident."</p>
Justification	<p>Ces éléments ne sont que des possibilités qui sont données et ne doivent en aucun cas être considérés comme des références.</p>
Traduction de courtoisie	<p>It is appropriate to modify in the following way :</p> <p>"(a) Communication means are may be provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency; (b) Communication means are may be provided to ensure allow the immediate summoning of designated personnel not on standby duty; (c) Communication means are may be provided to ensure allow two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident."</p> <p>These elements are just possibilities given and they cannot in any circumstances be considered as references.</p>

response Not accepted

Communications are very important for rescue and fire fighting services in order to improve coordination and efficiency when attending to an emergency. Therefore, the Agency decided to elevate the proposed GM into a new AMC9-ADR.OPS.B.010 and include also some additional requirements.

comment **818** comment by: *Dublin Airport Authority*

This should be considered as an Acceptable Means of Compliance.

Consider adding items -

- (d) – Communication between crew members should be provided
- (e) – A system for monitoring the movement area for incidents should be provided.

response Accepted

Text has been revised to include the proposal and moved to AMC1 -

ADR.OPS.B.010.

comment

976 comment by: *Union des Aéroports français - UAF*
Attachment [#183](#)
UAF NPA 2011-20 (B.II) GM2-ADR-OPS.B.010
Référence : GM2-ADR-OPS.B.010
Communication System
Traduction de courtoisie
It is appropriate to modify in the following way :
“(a) Communication means ~~are~~ **may be** provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency;
(b) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** the immediate summoning of designated personnel not on standby duty;
(c) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident.”
These elements are just possibilities given and they cannot in any circumstances be considered as references.

response

Not accepted
Communications are very important for rescue and fire fighting services in order to improve coordination and efficiency when attending to an emergency. Therefore, the Agency decided to elevate the proposed GM into a new AMC9-ADR.OPS.B.010 and include also some additional requirements.

comment

1308 comment by: *Euroairport Bâle-Mulhouse*
Attachment [#184](#)
Aéroport Bâle – Mulhouse NPA 2011-20 (B.II)GM2-ADR-OPS.B.010
Référence : GM2-ADR-OPS.B.010
Communication System
Traduction de courtoisie
It is appropriate to modify in the following way :
“(a) Communication means ~~are~~ **may be** provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency;
(b) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** the immediate summoning of designated personnel not on standby duty;
(c) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident.”
These elements are just possibilities given and they cannot in any circumstances be considered as references.

response

Not accepted
Communications are very important for rescue and fire fighting services in

order to improve coordination and efficiency when attending to an emergency. Therefore, the Agency decided to elevate the proposed GM into a new AMC9-ADR.OPS.B.010 and include also some additional requirements.

comment

1369

comment by: UK CAA

Page No: 149

Paragraph No: GM2-ADR-OPS.B010

Comment: The UK has significant concerns over communications at an incident and believes this GM should be upgraded to an AMC

Justification: It is considered that communications are critical during an incident and that this guidance should be strengthened to an Acceptable Means of Compliance to ensure that adequate means are provided. The UK also believes that;

- a) communication between flight crew and the RFFS is recorded;
- b) communication between RFFS crew members is provided;
- c) a system for monitoring the movement area for incidents is provided.

Proposed Text: Change GM to an AMC. New text:

“(a) The aerodrome operator should ensure that:

(1) Communication means are provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency **and they are recorded;**

(2) Communication means are provided to ensure the immediate summoning of designated personnel not on standby duty;

(3) Communication means are provided to ensure two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident;

(4) Communication means is provided between rescue and fire-fighting crew members;

(5) A system for monitoring the movement area for incidents is provided.”

response

Accepted

Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.

comment

1723

comment by: London Luton Airport Operations Ltd

(a) Communication means are provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency; **Consider this should be an AMC.**

(c) Communication means are provided to ensure two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident. **Add in Item (d) - "Communication between crew members should be provided." Add in Item (e) - "A system for monitoring the movement area for incidents should be provided."**

response

Accepted

Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.

comment

1749

comment by: *Aéroport de Marseille - MRS/LFML*

It is appropriate to modify in the following way :

"(a) Communication means ~~are~~ **may be** provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency;

(b) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** the immediate summoning of designated personnel not on standby duty;

(c) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident."

These elements are just possibilities given and they cannot in any circumstances be considered as references.

response

Not accepted

Communications are very important for rescue and fire fighting services in order to improve coordination and efficiency when attending to an emergency. Therefore, the Agency decided to elevate the proposed GM into a new AMC9-ADR.OPS.B.010 and include also some additional requirements.

comment

1812

comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#185](#)

UAF NPA 2011-20 (B.II) GM2-ADR-OPS.B.010

Référence : GM2-ADR-OPS.B.010
 Communication System

Traduction de courtoisie

It is appropriate to modify in the following way :

"(a) Communication means ~~are~~ **may be** provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency;

(b) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** the immediate summoning of designated personnel not on standby duty;

(c) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident."

These elements are just possibilities given and they cannot in any circumstances be considered as references.

response

Not accepted

Communications are very important for rescue and fire-fighting services in order to improve coordination and efficiency when attending to an emergency. Therefore, the Agency decided to elevate the proposed GM into a new AMC9-ADR.OPS.B.010 and include also some additional requirements.

comment 1885 comment by: *Pau Pyrénées Airport - PUF/LFBP*

It is appropriate to modify in the following way :
“(a) Communication means ~~are~~ **may be** provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency;
(b) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** the immediate summoning of designated personnel not on standby duty;
(c) Communication means ~~are~~ **may be** provided to ~~ensure~~ **allow** two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident.”

These elements are just possibilities given and they cannot in any circumstances be considered as references.

response Not accepted

Communications are very important for rescue and fire-fighting services in order to improve coordination and efficiency when attending to an emergency. Therefore, the Agency decided to elevate the proposed GM into a new AMC9-ADR.OPS.B.010 and include also some additional requirements.

comment 1887 comment by: *Irish Aviation Authority*

Comment: There is an opportunity for EASA to establish a common European frequency for this purpose. At present the frequency of 121.6 is available for this purpose at larger aerodromes in the UK and Ireland. EASA should consider promulgating this frequency in GM.

response Noted

The proposal will be taken into consideration in the future.

comment 2044 comment by: *Shannon Airport*

This should be considered as an Acceptable Means of Compliance.

response Accepted

Text moved to AMC1-ADR.OPS.B.010.

comment 2118 comment by: *HIA - Highlands and Islands Airports Limited*

GM2-ADR-OPS.B010 (a) - Communications System - Consider this to be an AMC

GM2-ADR-OPS.B010 - Communications System

Add new items

- Communications between crew members should be provided
- a system of monitoring the movement area for incidents should be provided

response

Accepted

Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.

comment

2338

comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

<u>Référence : GM2-ADR-OPS.B.010</u>	Communication System
Proposition/commentaire	<p>Il convient d'apporter les modifications suivantes:</p> <p>"(a) Communication means are may be provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency;</p> <p>(b) Communication means are may be provided to ensure allow the immediate summoning of designated personnel not on standby duty;</p> <p>(c) Communication means are may be provided to ensure allow two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident."</p>
Justification	<p>Ces éléments ne sont que des possibilités qui sont données et ne doivent en aucun cas être considérés comme des références.</p>
Traduction de courtoisie	<p>It is appropriate to modify in the following way :</p> <p>"(a) Communication means are may be provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency;</p> <p>(b) Communication means are may be provided to ensure allow the immediate summoning of designated personnel not on standby duty;</p> <p>(c) Communication means are may be provided to ensure allow two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident."</p> <p>These elements are just possibilities given and they cannot in any circumstances be considered as references.</p>

response

Not accepted

Communications are very important for rescue and firefighting services in order to improve coordination and efficiency when attending to an emergency. Therefore, the Agency decided to elevate the proposed GM into a new AMC9-ADR.OPS.B.010 and include also some additional requirements.

comment

2382

comment by: *Norwich International Airport*

GM2-ADR-OPS.B.010 – Communication System

(a) Communication means are provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency;

Consider this should be an AMC.

(c) Communication means are provided to ensure two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident.

Add in Item (d) - "Communication between crew members should be provided."

Add in Item (e) - "A system for monitoring the movement area for incidents should be provided."

GM1-ADR.OPS.B.025 – Movement Area Driver Training (a)(8) – RFFS driving

(8) specialist functions as required, for example, in rescue and fire-fighting.

Consider upgrading to AMC and include more detail.

response

Accepted

Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.

comment

2416

comment by: *East Midlands Airport - EMA/EGNX*

Add item (d) " Communication between crew members should be provided".

response

Accepted

Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.

comment

2491

comment by: *DAA Cork Airport*

(a) - This should be considered as an Acceptable Means of Compliance.

	Consider adding: · Item (d) – “Communication between crew members should be provided”; Item (e) – “A system for monitoring the movement area for incidents should be provided.”
response	Accepted A new AMC9-ADR.OPS.B.010 has been drafted containing all the provisions of this GM, which has been subsequently deleted.

comment	2596 comment by: EAL AFS - Edinburgh Airport GM2-ADR-OPS.B.010 – Communication System (a) Communication means are provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency; Consider this should be an AMC. (c) Communication means are provided to ensure two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident. Add in Item (d) - “Communication between crew members should be provided.” Add in Item (e) – “A system for monitoring the movement area for incidents should be provided.”
response	Accepted Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.

comment	2610 comment by: Stansted Airport - Daren BARTHRAM GM2-ADR-OPS.B.010 – Communication System (a) Communication means are provided for direct communication between the rescue and fire-fighting service and the flight crew of an aircraft in emergency; Consider this should be an AMC. (c) Communication means are provided to ensure two-way communication with the rescue and fire-fighting vehicles in attendance at an aircraft accident or incident. Add in Item (d) - “Communication between crew members should be provided.” Add in Item (e) – “A system for monitoring the movement area for incidents should be provided.”
response	Accepted Text has been revised to include the proposal and moved to AMC1 - ADR.OPS.B.010.

INSTALLATIONS (ADR.OPS.B) – GM3-ADR-OPS.B.010 – Number of RFFS personnel

comment	<p>521 comment by: <i>CTIF The International Fire and Rescue Organization - Airport Commission</i></p> <p>-The coverage of buildings or to deal with traffic accidents or hazmat and every other call out of the fire service, may not reduce the level of protection (Category). -If a reducing occurs (breakdown of a fire engine) it has to be notificated or a shutdown of the airport has to lead</p>
response	<p>Accepted</p> <p>The first comment is addressed in a new point (a) (4) in AMC6-ADR.OPS.B.010. The second comment is dealt within the provision of aeronautical data section.</p>
comment	<p>620 comment by: <i>BAA Glasgow</i></p> <p>The appropriate number of personnel immediately available to respond to an incident should be determined by a task and resource analysis.</p>
response	<p>Accepted</p> <p>Proposal has been included in the GM.</p>
comment	<p>1573 comment by: <i>ECA - European Cockpit Association</i></p> <p>More precise regulation is needed for the staffing requirements.</p> <p>Roughly 1.5 times the aircraft category with full passenger configuration should be considered adequate personnel on duty: for example: 10 persons for a B-737-800 or 13 for a B-747. This includes:</p> <ul style="list-style-type: none"> ○ Fire chef controlling the response, communicating with the ATC, the flight crew, other responders, directing the firefighters ○ drivers, who also remain with the vehicle, operate the turrets and the pumps, ○ firefighters operating handlines, assisting evacuation, entering the cabin for interior firefighting and search and rescue. <p>The mutual aid response should be regulated and training for mutual aid responders also.</p>
response	<p>Noted</p> <p>All these are elements that are included in a Task and Resource analysis.</p>
comment	<p>1695 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p>

- AMC/GM to ANNEX III — Part-OPS — AMC3-ADR-OPS.B.010 — Number of RFFS vehicles and rescue equipment (p145-146)
- AMC/GM to ANNEX III — Part-OPS — GM3(bis)-ADR-OPS.B.010 — Number of RFFS personnel (p149)

2. Justification and proposed text / comment

- Paragraph (a)(1): For information, in France there is no vehicle for level 1 (it is a difference notified to ICAO). Moreover, some French aerodromes with instrument approach procedures decrease their level of protection to 1 or 2 during time periods by day or night. It is published in AIP.
- Paragraph (b) of AMC3-ADR-OPS.B.010 could be completed by guidance, including notes 1 and 2 of ICAO Annex 14 Volume 1 paragraph 9.2.2
- Table 1 should be renumbered Table 2.

Consequently, it is proposed :

- **that Table 1 be renumbered Table 2.**
- **to add a GM related to AMC3-ADR-OPS.B.010(b) on the number of RFFS vehicles and rescue equipment:**

GM3bis-ADR-OPS.B.010 – Number of RFFS vehicles and rescue equipment

"Special fire fighting equipment need not be provided for water areas; this does not prevent the provision of such equipment if it would be of practical use, such as when the areas concerned include reefs or islands. The objective is to plan and deploy the necessary life-saving flotation equipment as expeditiously as possible in a number commensurate with the largest aeroplane normally using the aerodrome."

response Accepted
 The proposal has been included in GM4 - ADR.OPS.B.010.

comment 1775 comment by: *ENAC Ente Nazionale per l'Aviazione Civile*
 Delete last sentence on staffing levels. This provision is already covered in AMC2-ADR.OR.E.005 — Aerodrome manual, E. PartD point 10.

response Accepted
 Text deleted.

comment 1956 comment by: *Aéroport de Tours Val de Loire - TUF/LFOT*
 THE AERODROME OPERATOR SHOULD **ENSURE**

response Noted

comment 2381 comment by: *Norwich International Airport*

	<p>a) The aerodrome operator should ensure that:</p> <p>(1) During flight operations, sufficient trained personnel is detailed and readily available to ride the rescue and fire-fighting vehicles and to operate the equipment at maximum capacity</p> <p>Consider adding after flight operations "and 15 minutes after departure".</p> <p>Consider adding requirement for personnel to be determined by a Task and Resource Analysis.</p>
response	<p>Partially accepted</p> <p>The first comment is accepted. The second comment has been considered in GM2-ADR.OPS.B.010.</p>
comment	<p>2430 comment by: <i>Aberdeen Airport</i></p> <p>Consider referencing that number of personnel should be determined by conducting a Task Resource Analysis.</p>
response	<p>Accepted</p> <p>Proposal has been included in the GM.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM4-ADR-OPS.B.010 – Training of Rescue and Fire-Fighting Personnel</p>	<p>p. 149-150</p>
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comment	<p>2 comment by: <i>Croatian Civil Aviation Agency</i></p> <p>GM4-ADR-OPS.B.010 – Training of Rescue and Fire Fighting Personnel</p> <p>(a) The training of rescue and fire-fighting personnel may include initial and recurrent training in at least the following areas:</p> <ul style="list-style-type: none">(1) airport familiarisation;(2) aircraft familiarisation;(3) rescue and fire-fighting personnel safety;(4) emergency communications systems on the aerodrome, including aircraft firerelated alarms;(5) use of the fire hoses, nozzles, turrets and other appliances;(6) application of the types of extinguishing agents required;(7) emergency aircraft evacuation assistance;(8) fire-fighting operations;(9) adaptation and use of structural rescue and fire-fighting equipment for aircraft rescue and fire-fighting;(10) dangerous goods;(11) familiarisation with fire fighters' duties under the aerodrome emergency plan; and(12) protective clothing and respiratory protection;(13) low visibility procedures;(14) human performance including team coordination;
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	<p>(15) protective clothing and respiratory protection; (16) composite materials; (17) recognition of aircraft ballistic parachute systems during emergency operations.</p>
response	<p>Accepted Text deleted.</p>

comment	<p>504 comment by: <i>Icelandic Civil Aviation Administration</i> — Training of Rescue and Fire Fighting Personnel Suggest to elevate to AMC.</p>
response	<p>Noted</p>

comment	<p>993 comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• Draft Commission Regulation - Article 2 - Definitions (p6-10)• AMC/GM to ANNEX III — Part-OPS — GM4-ADR-OPS.B.010 — Training of Rescue and Fire Fighting Personnel (p149-150)• AMC/GM to ANNEX III — Part-OPS — GM1-ADR-OPS.B.025 — Movement Area Driving Training (p156)• AMC/GM to ANNEX III — Part-OPS — AMC-ADR-OPS.B.045 – Low visibility operations (p159-160) <p><u>2. Justification and proposed text / comment</u></p> <p>This comment is linked with comment 1232 in book I. This comment is critical, as the drafted rules are confusing on this subject. When low visibility conditions occur, low visibility operations are activated. According to PANS-ATM (ICAO Doc 4444 – paragraph 7.12.3): “Low visibility operations shall be initiated by or through the aerodrome control tower.” Concerning low visibility, Annex 14 Volume 1 only deals with procedures to be implemented by the aerodrome operator during low visibility conditions. As a conclusion: ATM is in charge of initiating low visibility operations. Once these low visibility operations initiated, the aerodrome operator has to implement adequate procedures. Consequently, the definition given in the cover regulation (p8) for “low visibility procedures” is not needed and even brings confusion between the aerodrome operator’s procedures and the air navigation service provider’s procedures. This definition is not an ICAO Annex 14 volume 1 (which does not use “Standard category I to III”) and is an ATM definition: aerodrome operators are dealing with “procedures in low visibility conditions” or “procedures during low visibility operations”. Their goal is to permit the implementation of LVP on the aerodrome in low visibility conditions that are when the RVR is less than 550 meters or when asked by the ANSP. The wording of the implementing rule ADR-OPS.B.045 (“procedures for aerodrome operations in low visibility conditions”) reflects correctly this duality and should be taken for the AMC. The definition of LVP should be</p>
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deleted from the Cover Regulation to avoid confusion.
Therefore DGAC proposes:

Article 2 of the cover regulation:

~~“‘Low visibility procedures’ means procedures applied at an aerodrome for the purpose of ensuring safe operations during lower than Standard Category I, other than Standard Category II, Category II and III conditions.~~

~~‘Lower than Standard Category I operation’ means a Category I instrument approach and landing operation using Category I Decision Height, with an RVR lower than would normally be associated with the applicable Decision Height but not lower than 400 m.~~

~~[...]~~

~~‘Other than Standard Category II operation’ means a precision instrument approach and landing operation using ILS or MLS where some or all of the elements of the precision approach Category II light system are not available, and with:~~

~~– Decision Height (DH) below 200 ft but not lower than 100 ft; and~~

~~– Runway Visual Range (RVR) of not less than 350 m.”~~

GM4-ADR-OPS.B.010 – Training of Rescue and Fire Fighting Personnel

“(a) The training of rescue and fire-fighting personnel may include initial and recurrent training in at least the following areas:

[...]

(13) low visibility **operations procedures**;

[...]”

GM1-ADR-OPS.B.025 – Movement Area Driving Training

“(a) The training for driving on the movement area may include the following:

[...]

(7) low visibility **operations procedures**; and

[...]”

AMC-ADR-OPS.B.045 – Low visibility operations

“(a) The aerodrome operator should, in collaboration with ANSPs and major aircraft operators at the aerodrome establish **low visibility means and procedures for aerodrome operations in low visibility conditions (LVP)** if movement of aircraft is permitted when the RVR is less than 550 meters;

(b) **Low visibility** The **procedures for aerodrome operations in low visibility conditions (LVP)** should be approved by the competent authority before implementation;

(c) When **the procedures for aerodrome operations in low visibility conditions (LVP)** are in effect, the aerodrome operator should make available to AIS and/or ATS, as appropriate, information on the status of the aerodrome facilities;

(d) **The aerodrome operator should establish and implement procedures for aerodrome operations in low visibility conditions** ~~to~~ **should** ensure that, when **low visibility procedures (LVP)** ~~they~~ are in effect, persons and vehicles operating on an apron are restricted to the essential minimum;

(e) The procedures to be established by the aerodrome operator to ensure safe aerodrome operations during low visibility conditions should cover the following subjects:

(1) physical characteristics of the runway environment, including approach

and departure areas;
(2) obstacle limitation surfaces;
(3) visual aids compliant to AMC-ADR-OPS.B.040 (night operations);
(4) non-visual aids;
(5) secondary power supplies;
(6) movement area safety;
(7) RFFS."

response Noted

comment 1576 comment by: ECA - European Cockpit Association

Missing training subjects:

- o Emergency first aid,
- o driver training,
- o cargo aircraft,
- o rescue, tools and forcible entry,
- o communication to flight crew, including hand signals

Regulations for vehicles are missing. Just a few points: all terrain capabilities, pump and roll capability, lighting requirements, turret and bumper turret range and capability requirements, acceleration and braking, ground pressure.

Regulations for emergency medical aid at airport emergencies are missing. Full emergency and local standby has to be regulated.

response Noted

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – AMC-ADR.OPS.B.015 – Monitoring and
Inspection of movement area and related facilities**

p. 150

comment 1042 comment by: Finavia

Aerodrome opening hours shall be considered too, because not all airports with code number 3 or 4 are open 24/7. "at least twice where the code number is 3 or 4 and aerodrome is open at least 12 hours a day."

response Noted

The Agency considers appropriate to establish the minimum number of daily runway inspections according to ICAO. Aerodrome operators are expected to adjust their inspection schedule considering amongst others the aerodrome operating hours, the expected traffic, weather conditions, etc.

comment 1699 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX III – Part-OPS –AMC-ADR-OPS.B.015 – Monitoring and Inspection of movement area and related facilities

(p150)

- AMC/GM to ANNEX III — Part-OPS —GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection (p 151)
- AMC/GM to ANNEX III — Part-OPS —GM2-ADR-OPS.B.015 – Visual Aids Inspection (p151-152)
- AMC/GM to ANNEX III — Part-OPS — GM4-ADR-OPS.B.015 – Inspection logbook (p152)
- AMC/GM to ANNEX III — Part-OPS - GM5-ADR-OPS.B.015 – Follow up of inspections (p152)
- AMC/GM to ANNEX III — Part-OPS - GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections (p152-153)

2. Justification and proposed text / comment

In paragraph (a)(4), inspection/checking of drainage systems should be extended to the stormwater collection systems available at the aerodrome. **It is consequently proposed to revise AMC-ADR-OPS.B.015 as follows:**

AMC-ADR-OPS.B.015 —Monitoring and Inspection of movement area and related facilities

"(a) The aerodrome operator should establish a monitoring and inspection program of the movement area which is commensurate with the traffic expected at the aerodrome. Inspections of the movement area should be carried out each day at least once where the code number is 1 or 2 and at least twice where the code number is 3 or 4;

The inspections should cover at least the following items:

- (1) Visual aids;*
 - (2) Other lighting systems required for the safety of aerodrome operations;*
 - (3) Pavements and adjacent ground surfaces;*
 - (4) Drainage and storm water collection systems;*
 - (5) Fencing and other access control devices;*
 - (6) The movement area environment inside the aerodrome boundary, and outside the aerodrome boundary within line of sight;*
 - (7) FOD and wildlife;*
- [...]"*

The corresponding GMs should reflect the 3 purposes of movement area inspections:

- report information to ANSPs and AIS on matters of operational significance,
- initiate appropriate maintenance including immediate corrective action (removal of FOD for instance), and
- record events to feed the aerodrome SMS. They should include material derived from the ICAO Annex 14 Volume 1 standard 2.9.2, and proposed in the State Letter 11/41 (Ref: AN 4/1.1.52-11/41) *"in order to identify any default or potential hazards to the safety of aircraft or aerodrome operations."*

- GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection

Rubber built-up should be reported only when it may impair the runway surface friction characteristics.

Reporting of contaminants is required according to ICAO Annex 14 Volume

1 (2.9.2) and AMC-ADR-OPS.A.005.

Daily inspection of the paved surfaces of the movement area does not require to report pavement cracking. This is addressed by more specialized maintenance survey : it is proposed to delete « cracking »

It is consequently proposed to revise GM1-ADR-OPS.B.015 as follows:

GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection

"(a) [...]

(1) *General cleanliness with particular attention to material which could cause engine ingestion damage. This may include debris from runway maintenance operations or excessive grit remaining after runway gritting. Any build-up of tire rubber deposits should be noted if it may impair the runway surface friction characteristics;*

(1bis) *Presence of contaminants such as snow, slush, ice, wet ice, wet snow on ice or frost, water, anti-icing or de-icing chemicals, mud, dust, sand, volcanic ash, oil which may impair the runway surface friction characteristics; particular attention may be given to the simultaneous presence of snow, slush, ice, wet ice, wet snow on ice with anti-icing or de-icing chemicals;*

(2) *Signs of damage to the pavement surface including ~~cracking and~~ spalling of concrete, condition of joint sealing, cracking and looseness of aggregate in asphalt surfaces or break-up of friction courses;*

[...]

(5) *~~The general bearing strength of grass areas, particularly those close to aircraft pavement surface~~ The ability of the grass areas to support an aeroplane and to support ground vehicles which may operate on the areas;*

[...]"

GM2-ADR-OPS.B.015 – Visual Aids Inspection

Flight checks were performed by the French DGAC on CatII/III aerodromes until early 2000s'. Considering the poor added value with regard to pilot reports and ground checks, the DGAC abandoned flight checks. In addition flight checks cannot be considered as routine aerodrome inspection as they require laboratory aircraft: **it is proposed to delete paragraph (a) from GM2-ADR-OPS.B.015**

- **GM4-ADR-OPS.B.015 – Inspection logbook**

Necessary should be avoided in a GM. Findings should be avoided as they may be confused with findings of non-compliances during the audits by the competent authority: it is proposed to use "results and observations".

It is consequently proposed to revise GM4-ADR-OPS.B.015 as follows:

GM4-ADR-OPS.B.015 – Inspection logbook

"(a) ~~It is necessary to keep a logbook for all the routine and non-routine inspections of the movement area and related facilities~~ **may be recorded in a logbook;**

(b) *The inspection logbook ~~would should~~ include:*

(1) *Details of inspection intervals and times;*

(2) *Names of persons carrying out the inspection;*

(3) *~~Findings~~ **Results and observations, if any.**"*

- **GM5-ADR-OPS.B.015 – Follow up of inspections**

This GM should reflect the 3 purposes of movement area inspections:

report information to ANSPs and AIS on matters of operational significance, initiate appropriate maintenance including immediate corrective action (removal of FOD for instance) and record events to feed the aerodrome SMS. Hence, the following proposal:

GM5-ADR-OPS.B.015 – Follow up of inspections

"Arrangements may exist for reporting the results of inspections and for taking prompt follow-up actions to ensure correction of unsafe conditions. These arrangements would include notification to ANSP and AIS, removal of FODs and wildlife control and recording of events for analysis according to the SMS of the aerodrome operator as required."

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

Paragraph (a) is already covered in GM4-ADR-OPS-B.015 and in Part OR-Management: it should be deleted

Findings should be avoided, and "Should" should be avoided

Works are concerned too, not only construction; reference to AMC1-ADR-OPS.B.070 (c), (d) and (e)

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

~~"(a) The names and roles of persons responsible for carrying out inspections may be designated.~~

~~(ab) Personnel who conduct inspections may receive training in at least the following areas:~~

~~(1) Aerodrome familiarisation, including airport signs, markings and lighting;~~

~~(2) Aerodrome Manual;~~

~~(3) Aerodrome Emergency Plan;~~

~~(4) Notice to Airmen (NOTAM) notification procedures;~~

~~(5) Aerodrome driving rules;~~

~~(6) Aerodrome inspection procedures and techniques;~~

~~(7) Procedures for reporting inspection findings results and observations.~~

~~(c) Inspectors may use checklists covering the various inspection areas. A sketch of the aerodrome will should accompany the checklist so that the location of problems can be marked for easy identification.~~

~~(d) Inspectors may review the most recently completed checklist from the previous inspection cycle prior to beginning the inspection.~~

~~(e) If work construction is in progress, inspectors should be familiar with the safety plan of the construction are aware of and comply with the instructions and procedures as specified in AMC1-ADR-OPS.B.070 (c), (d) and (e).~~

response

Accepted

The comment on AMC-ADR.OPS.B.015 is agreed and text revised accordingly.

comment

1890

comment by: Irish Aviation Authority

Comment: Monitoring and inspection of some items of this AMC could be very onerous, i.e. twice daily inspections of (4) drainage systems and (5) fencing. An additional GM may be required to allow a longer inspection interval for items such as drainage and fencing, possibly on a weekly basis.

response Accepted
Text revised to consider the proposal.

comment 2070 comment by: AENA - Aeropuertos Españoles y Navegación Aérea

In this AMC, there seems to be a confusion between:
- operational runway inspections, having mainly for objective to detect FODs and to asses the possible contamination of the runway, which should be performed regularly during the day, and
- movement area inspections covering the items mentioned in the AMC, which can be much longer, with a frequency depending on the considered item (lighting systems once a day, fencing once per week, etc.).

The following wording is proposed:

AMC-ADR-OPS.B.015 –Monitoring and Inspection of movement area and related facilities

“(a) The aerodrome operator should establish a monitoring and inspection program of the movement area which is commensurate with the traffic expected at the aerodrome. Inspections of the movement area covering FOD, the status of visual aids, wildlife, and current runway surface condition should be carried out each day at least once where the code number is 1 or 2 and at least twice where the code number is 3 or 4;

Inspections covering other items (as mentioned in the current wording) should be carried out once a week or once a month. The inspections should cover at least the following items:

- (1) Visual aids;*
 - (2) Other lighting systems required for the safety of aerodrome operations;*
 - (3) Pavements and adjacent ground surfaces;*
 - (4) Drainage systems;*
 - (5) Fencing and other access control devices;*
 - (6) The movement area environment inside the aerodrome boundary, and outside the aerodrome boundary within line of sight;*
 - (7) FOD and wildlife;*
- in order to identify any default or potential hazards to the safety of aircraft or aerodrome operations.”*

response Accepted
Text revised to consider the proposal.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection p. 151

comment 1699 ❖ comment by: DGAC Direction Générale de l'aviation civile
1. Affected paragraphs

- AMC/GM to ANNEX III – Part-OPS –AMC-ADR-OPS.B.015 –

Monitoring and Inspection of movement area and related facilities (p150)

- AMC/GM to ANNEX III — Part-OPS —GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection (p 151)
- AMC/GM to ANNEX III — Part-OPS —GM2-ADR-OPS.B.015 – Visual Aids Inspection (p151-152)
- AMC/GM to ANNEX III — Part-OPS — GM4-ADR-OPS.B.015 – Inspection logbook (p152)
- AMC/GM to ANNEX III — Part-OPS - GM5-ADR-OPS.B.015 – Follow up of inspections (p152)
- AMC/GM to ANNEX III — Part-OPS - GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections (p152-153)

2. Justification and proposed text / comment

In paragraph (a)(4), inspection/checking of drainage systems should be extended to the stormwater collection systems available at the aerodrome. **It is consequently proposed to revise AMC-ADR-OPS.B.015 as follows:**

AMC-ADR-OPS.B.015 —Monitoring and Inspection of movement area and related facilities

"(a) The aerodrome operator should establish a monitoring and inspection program of the movement area which is commensurate with the traffic expected at the aerodrome. Inspections of the movement area should be carried out each day at least once where the code number is 1 or 2 and at least twice where the code number is 3 or 4;

The inspections should cover at least the following items:

- (1) Visual aids;*
 - (2) Other lighting systems required for the safety of aerodrome operations;*
 - (3) Pavements and adjacent ground surfaces;*
 - (4) Drainage and storm water collection systems;*
 - (5) Fencing and other access control devices;*
 - (6) The movement area environment inside the aerodrome boundary, and outside the aerodrome boundary within line of sight;*
 - (7) FOD and wildlife;*
- [...]"*

The corresponding GMs should reflect the 3 purposes of movement area inspections:

- report information to ANSPs and AIS on matters of operational significance,
- initiate appropriate maintenance including immediate corrective action (removal of FOD for instance), and
- record events to feed the aerodrome SMS. They should include material derived from the ICAO Annex 14 Volume 1 standard 2.9.2, and proposed in the State Letter 11/41 (Ref: AN 4/1.1.52-11/41) *"in order to identify any default or potential hazards to the safety of aircraft or aerodrome operations."*

- GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection

Rubber built-up should be reported only when it may impair the runway surface friction characteristics.

Reporting of contaminants is required according to ICAO Annex 14 Volume 1 (2.9.2) and AMC-ADR-OPS.A.005.

Daily inspection of the paved surfaces of the movement area does not require to report pavement cracking. This is addressed by more specialized maintenance survey : it is proposed to delete « cracking »

It is consequently proposed to revise GM1-ADR-OPS.B.015 as follows:

GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection

"(a) [...]

(1) *General cleanliness with particular attention to material which could cause engine ingestion damage. This may include debris from runway maintenance operations or excessive grit remaining after runway gritting. Any build-up of tire rubber deposits should be noted if it may impair the runway surface friction characteristics;*

(1bis) *Presence of contaminants such as snow, slush, ice, wet ice, wet snow on ice or frost, water, anti-icing or de-icing chemicals, mud, dust, sand, volcanic ash, oil which may impair the runway surface friction characteristics; particular attention may be given to the simultaneous presence of snow, slush, ice, wet ice, wet snow on ice with anti-icing or de-icing chemicals;*

(2) *Signs of damage to the pavement surface including ~~cracking and spalling of concrete, condition of joint sealing, cracking and looseness of aggregate in asphalt surfaces or break-up of friction courses;~~*

[...]

(5) *~~The general bearing strength of grass areas, particularly those close to aircraft pavement surface~~The ability of the grass areas to support an aeroplane and to support ground vehicles which may operate on the areas;*

[...]"

GM2-ADR-OPS.B.015 – Visual Aids Inspection

Flight checks were performed by the French DGAC on CatII/III aerodromes until early 2000s'. Considering the poor added value with regard to pilot reports and ground checks, the DGAC abandoned flight checks. In addition flight checks cannot be considered as routine aerodrome inspection as they require laboratory aircraft: **it is proposed to delete paragraph (a) from GM2-ADR-OPS.B.015**

- **GM4-ADR-OPS.B.015 – Inspection logbook**

Necessary should be avoided in a GM. Findings should be avoided as they may be confused with findings of non-compliances during the audits by the competent authority: it is proposed to use "results and observations".

It is consequently proposed to revise GM4-ADR-OPS.B.015 as follows:

GM4-ADR-OPS.B.015 – Inspection logbook

"(a) ~~It is necessary to keep a logbook for all the routine and non-routine inspections of the movement area and related facilities~~ **may be recorded in a logbook;**

(b) *The inspection logbook ~~would should~~ include:*

(1) *Details of inspection intervals and times;*

(2) *Names of persons carrying out the inspection;*

(3) *~~Findings~~Results and observations, if any."*

- **GM5-ADR-OPS.B.015 – Follow up of inspections**

This GM should reflect the 3 purposes of movement area inspections: report information to ANSPs and AIS on matters of operational significance, initiate appropriate maintenance including immediate corrective action (removal of FOD for instance) and record events to feed the aerodrome SMS. Hence, the following proposal:

GM5-ADR-OPS.B.015 – Follow up of inspections

"Arrangements may exist for reporting the results of inspections and for taking prompt follow-up actions to ensure correction of unsafe conditions. These arrangements would include notification to ANSP and AIS, removal of FODs and wildlife control and recording of events for analysis according to the SMS of the aerodrome operator as required."

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

Paragraph (a) is already covered in GM4-ADR-OPS-B.015 and in Part OR-Management: it should be deleted

Findings should be avoided, and "Should" should be avoided

Works are concerned too, not only construction; reference to AMC1-ADR-OPS.B.070 (c), (d) and (e)

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

~~"(a) The names and roles of persons responsible for carrying out inspections may be designated:~~

~~(ab) Personnel who conduct inspections may receive training in at least the following areas:~~

~~(1) Aerodrome familiarisation, including airport signs, markings and lighting;~~

~~(2) Aerodrome Manual;~~

~~(3) Aerodrome Emergency Plan;~~

~~(4) Notice to Airmen (NOTAM) notification procedures;~~

~~(5) Aerodrome driving rules;~~

~~(6) Aerodrome inspection procedures and techniques;~~

~~(7) Procedures for reporting inspection findings results and observations.~~

~~(c) Inspectors may use checklists covering the various inspection areas. A sketch of the aerodrome will should accompany the checklist so that the location of problems can be marked for easy identification.~~

~~(d) Inspectors may review the most recently completed checklist from the previous inspection cycle prior to beginning the inspection.~~

~~(e) If work construction is in progress, inspectors should be familiar with the safety plan of the construction are aware of and comply with the instructions and procedures as specified in AMC1-ADR-OPS.B.070 (c), (d) and (e).~~

response

Partially accepted

The comments on GM1-ADR.OPS.B.015 are partially agreed, and more specifically:

The inclusion of the phrase in (a) (1) 'if it may impair the runway friction characteristics' is not agreed. The objective is to note the built-up of rubber deposits. The assessment of the runway friction characteristics is the next step.

The proposal to include a new paragraph after (a) (1) is agreed

The proposal to delete the word 'cracking' from (a) (3) is not agreed. Although, we agree that identification of crackings is a matter of more detailed inspection, we cannot exclude that crackings could be identified during routine inspections.

The proposed change to (b) (5) is not agreed. The ability of the grassed

areas to support the operation of aircraft or vehicles cannot be assessed through normal inspections. For that purpose a detailed study is required.

comment 2071 comment by: AENA - Aeropuertos Españoles y Navegación Aérea

(a) (1) General cleanliness with particular attention to material which could cause engine ingestion damage. This may include debris from runway maintenance operations or excessive grit remaining after runway gritting. Any build-up of tire rubber deposits should be noted *if it may impair the runway surface friction characteristics*;
 (a)(1bis) Presence of contaminants such as snow, slush, ice, wet ice, wet snow on ice or frost, water, anti-icing or de-icing chemicals, mud, dust, sand, volcanic ash, oil which may impair the runway surface friction characteristics; particular attention may be given to the simultaneous presence of snow, slush, ice, wet ice, wet snow on ice with anti-icing or de-icing chemicals;
 (a)(2) Signs of damage to the pavement surface including ~~cracking and~~ spalling of concrete, condition of joint sealing, cracking and looseness of aggregate in asphalt surfaces or break-up of friction courses;
 (b) (5) ~~The general bearing strength of grass areas, ...~~
 The ability of the grass areas to support an aeroplane and to support ground vehicles which may operate on the areas.
 (b) (7) Foreign Object Debris and wildlife

response Partially accepted

The comments on GM1-ADR.OPS.B.015 are partially agreed, and more specifically:
 The inclusion of the phrase in (a) (1) 'if it may impair the runway friction characteristics' is not agreed. The objective is to note the built-up of rubber deposits. The assessment of the runway friction characteristics is the next step.
 The proposal to include a new paragraph after (a) (1) is agreed
 The proposal to delete the word 'cracking' from (a) (3) is not agreed. Although, we agree that identification of crackings is a matter of more detailed inspection, we cannot exclude that crackings could be identified during routine inspections.
 The proposed change to (b) (5) is not agreed. The ability of the grassed areas to support the operation of aircraft or vehicles cannot be assessed through normal inspections. For that purpose a detailed study is required.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM2-ADR-OPS.B.015 – Visual Aids Inspection p. 151-152

comment 571 comment by: Vienna International Airport
delete (a)

response Not accepted

The fact that ICAO had included flight checks in Doc.9137 and considered as guidance, cannot downgrade their importance to ensure the proper functioning of the visual aids.

comment 1016 comment by: CAA Austria - Ministry of Transport
(a) clarify how often

response Accepted
Clarification has been provided in point (a) of the GM.

comment 1186 comment by: Salzburger Flughafen GmbH
delete (a)

response Not accepted
The fact that ICAO had included flight checks in Doc.9137 and considered as guidance, cannot downgrade their importance to ensure the proper functioning of the visual aids.

comment 1371 comment by: UK CAA
Page No: 151
Paragraph No: GM2-ADR-OPS.B.015 (a)
Comment: This guidance material should be elevated to AMC and amended.
Justification: For an instrument runway, a check every six months to confirm that the pattern of lights as seen by pilots is acceptable is a very necessary part of the planned maintenance regime for AGL. Commissioning checks are also necessary to ensure the correct performance of the lights.
Proposed Text: New AMC: Flight checks of approach and runway lighting systems **should be** carried out to ensure the pattern is correct and the lights are working **whenever a new system is commissioned, every six months for an instrument runway, and annually for all other classes of runway.** The opportunity...

response Partially accepted
The Agency partially agrees with the proposed text, but it prefers to keep it in GM as it is the case also at ICAO. ICAO Doc.9137 Part 8 which recommends an annual flight check inspection.

comment 1373 comment by: UK CAA
Page No: 151
Paragraph No: GM2-ADR-OPS.B.015 (b)
Comment: This paragraph should be more specific so that it refers to

photometric testing of runway lights and at a periodicity appropriate to the level of traffic. It should be elevated to AMC.

Justification: Photometric testing is the way of ensuring levels of serviceability is maintained.

Proposed Text: New AMC: Photometric testing of runway lighting and approach lighting that is accessible with the equipment to be used should be carried out in a targeted manner aimed at maintaining high levels of serviceability. The regularity of testing should be adjusted to achieve the target level of serviceability applicable to the service being tested.

response

Partially accepted

The Agency agrees with the proposed text, but it prefers to keep it in GM as it is the case also at ICAO.

comment

1490

comment by: *Flughafen Graz Betriebs GmbH*

delete (a)

response

Not accepted

The fact that ICAO had included flight checks in Doc.9137 and considered as guidance, cannot downgrade their importance to ensure the proper functioning of the visual aids.

comment

1542

comment by: *Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH*

delete (a)

response

Not accepted

The fact that ICAO had included flight checks in Doc.9137 and considered as guidance, cannot downgrade their importance to ensure the proper functioning of the visual aids.

comment

1649

comment by: *Flughafen Linz-Hörsching - LNZ/LOWL*

delete (a)

response

Not accepted

The fact that ICAO had included flight checks in Doc.9137 and considered as guidance, cannot downgrade their importance to ensure the proper functioning of the visual aids.

comment

1699 ❖

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS.B.015 — Monitoring and Inspection of movement area and related facilities (p150)

- AMC/GM to ANNEX III — Part-OPS —GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection (p 151)
- AMC/GM to ANNEX III — Part-OPS —GM2-ADR-OPS.B.015 – Visual Aids Inspection (p151-152)
- AMC/GM to ANNEX III — Part-OPS — GM4-ADR-OPS.B.015 – Inspection logbook (p152)
- AMC/GM to ANNEX III — Part-OPS - GM5-ADR-OPS.B.015 – Follow up of inspections (p152)
- AMC/GM to ANNEX III — Part-OPS - GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections (p152-153)

2. Justification and proposed text / comment

In paragraph (a)(4), inspection/checking of drainage systems should be extended to the stormwater collection systems available at the aerodrome. **It is consequently proposed to revise AMC-ADR-OPS.B.015 as follows:**

AMC-ADR-OPS.B.015 –Monitoring and Inspection of movement area and related facilities

"(a) The aerodrome operator should establish a monitoring and inspection program of the movement area which is commensurate with the traffic expected at the aerodrome. Inspections of the movement area should be carried out each day at least once where the code number is 1 or 2 and at least twice where the code number is 3 or 4;

The inspections should cover at least the following items:

- (1) Visual aids;*
- (2) Other lighting systems required for the safety of aerodrome operations;*
- (3) Pavements and adjacent ground surfaces;*
- (4) Drainage and storm water collection systems;*
- (5) Fencing and other access control devices;*
- (6) The movement area environment inside the aerodrome boundary, and outside the aerodrome boundary within line of sight;*
- (7) FOD and wildlife;*

[...]"

The corresponding GMs should reflect the 3 purposes of movement area inspections:

- report information to ANSPs and AIS on matters of operational significance,
- initiate appropriate maintenance including immediate corrective action (removal of FOD for instance), and
- record events to feed the aerodrome SMS. They should include material derived from the ICAO Annex 14 Volume 1 standard 2.9.2, and proposed in the State Letter 11/41 (Ref: AN 4/1.1.52-11/41) *"in order to identify any default or potential hazards to the safety of aircraft or aerodrome operations."*

- GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection

Rubber built-up should be reported only when it may impair the runway surface friction characteristics.

Reporting of contaminants is required according to ICAO Annex 14 Volume 1 (2.9.2) and AMC-ADR-OPS.A.005.

Daily inspection of the paved surfaces of the movement area does not require to report pavement cracking. This is addressed by more specialized maintenance survey : it is proposed to delete « cracking »

It is consequently proposed to revise GM1-ADR-OPS.B.015 as follows:

GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection

"(a) [...]

(1) *General cleanliness with particular attention to material which could cause engine ingestion damage. This may include debris from runway maintenance operations or excessive grit remaining after runway gritting. Any build-up of tire rubber deposits should be noted if it may impair the runway surface friction characteristics;*

(1bis) *Presence of contaminants such as snow, slush, ice, wet ice, wet snow on ice or frost, water, anti-icing or de-icing chemicals, mud, dust, sand, volcanic ash, oil which may impair the runway surface friction characteristics; particular attention may be given to the simultaneous presence of snow, slush, ice, wet ice, wet snow on ice with anti-icing or de-icing chemicals;*

(2) *Signs of damage to the pavement surface including ~~cracking and spalling of concrete~~, condition of joint sealing, cracking and looseness of aggregate in asphalt surfaces or break-up of friction courses;*

[...]

(5) *The general bearing strength of grass areas, particularly those close to aircraft pavement surface. The ability of the grass areas to support an aeroplane and to support ground vehicles which may operate on the areas;*

[...]"

GM2-ADR-OPS.B.015 – Visual Aids Inspection

Flight checks were performed by the French DGAC on CatII/III aerodromes until early 2000s'. Considering the poor added value with regard to pilot reports and ground checks, the DGAC abandoned flight checks. In addition flight checks cannot be considered as routine aerodrome inspection as they require laboratory aircraft: **it is proposed to delete paragraph (a) from GM2-ADR-OPS.B.015**

- **GM4-ADR-OPS.B.015 – Inspection logbook**

Necessary should be avoided in a GM. Findings should be avoided as they may be confused with findings of non-compliances during the audits by the competent authority: it is proposed to use "results and observations".

It is consequently proposed to revise GM4-ADR-OPS.B.015 as follows:

GM4-ADR-OPS.B.015 – Inspection logbook

"(a) ~~It is necessary to keep a logbook for all the routine and non-routine inspections of the movement area and related facilities~~ **may be recorded in a logbook;**

(b) *The inspection logbook ~~would should~~ include:*

(1) *Details of inspection intervals and times;*

(2) *Names of persons carrying out the inspection;*

(3) *~~Findings~~ **Results and observations, if any.**"*

- **GM5-ADR-OPS.B.015 – Follow up of inspections**

This GM should reflect the 3 purposes of movement area inspections: report information to ANSPs and AIS on matters of operational

significance, initiate appropriate maintenance including immediate corrective action (removal of FOD for instance) and record events to feed the aerodrome SMS. Hence, the following proposal:

GM5-ADR-OPS.B.015 – Follow up of inspections

"Arrangements may exist for reporting the results of inspections and for taking prompt follow-up actions to ensure correction of unsafe conditions. These arrangements would include notification to ANSP and AIS, removal of FODs and wildlife control and recording of events for analysis according to the SMS of the aerodrome operator as required."

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

Paragraph (a) is already covered in GM4-ADR-OPS-B.015 and in Part OR-Management: it should be deleted

Findings should be avoided, and "Should" should be avoided

Works are concerned too, not only construction; reference to AMC1-ADR-OPS.B.070 (c), (d) and (e)

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

~~"(a) The names and roles of persons responsible for carrying out inspections may be designated.~~

~~(ab) Personnel who conduct inspections may receive training in at least the following areas:~~

~~(1) Aerodrome familiarisation, including airport signs, markings and lighting;~~

~~(2) Aerodrome Manual;~~

~~(3) Aerodrome Emergency Plan;~~

~~(4) Notice to Airmen (NOTAM) notification procedures;~~

~~(5) Aerodrome driving rules;~~

~~(6) Aerodrome inspection procedures and techniques;~~

~~(7) Procedures for reporting inspection findings results and observations.~~

~~(c) Inspectors may use checklists covering the various inspection areas. A sketch of the aerodrome will should accompany the checklist so that the location of problems can be marked for easy identification.~~

~~(d) Inspectors may review the most recently completed checklist from the previous inspection cycle prior to beginning the inspection.~~

~~(e) If work construction is in progress, inspectors should be familiar with the safety plan of the construction are aware of and comply with the instructions and procedures as specified in AMC1-ADR-OPS.B.070 (c), (d) and (e).~~

response

Not accepted

The comment on GM2-ADR.OPS.B.015 is not agreed. The fact that ICAO had included flight checks in Doc.9137 and considered as guidance, cannot downgrade their importance to ensure the proper functioning of the visual aids.

comment

2072

comment by: AENA - Aeropuertos Españoles y Navegación
Aérea

Considering the poor added value with regard to pilot reports and ground checks. In addition flight checks cannot be considered as routine aerodrome inspection as they require laboratory aircraft. (a) should be deleted

response *Noted*
Comment on is not agreed. The fact that ICAO had included flight checks in Doc.9137 and considered as guidance, cannot downgrade their importance to ensure the proper functioning of the visual aids.

comment 2200 comment by: *Flughafen Klagenfurt*
delete (a)

response Not accepted
The fact that ICAO had included flight checks in Doc.9137 and considered as guidance, cannot downgrade their importance to ensure the proper functioning of the visual aids.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – GM3-ADR-OPS.B.015 – Obstacles** p. 152

comment 1204 comment by: *Federal Office of Civil Aviation FOCA*
EASA should limit the obstacles requirements at the most to the aerodrome perimeter. Therefore the formulation must be more precise.

response Not accepted
Article 8a.4 of the BR requires that aerodrome operators should monitor aerodrome surroundings and take within their competence appropriate mitigating measures when activities or developments may cause unacceptable safety risks to aviation. The proposed GM provides information on what should be observed.

comment 2025 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
should be limited to the obstacle requirements within the aerodrome perimeter. Therefore it must be more precise.

response Not accepted
Article 8a.4 of the BR requires that aerodrome operators should monitor aerodrome surroundings and take within their competence appropriate mitigating measures when activities or developments may cause unacceptable safety risks to aviation. The proposed GM provides information on what should be observed.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – GM4-ADR-OPS.B.015 – Inspection
logbook** p. 152

comment	35	comment by: <i>ACI EUROPE - Airports Council International</i>
	change "logbook" into "log"	
response	Accepted Word changed.	
comment	364	comment by: <i>Avinor</i>
	GM4.ADR.OPS.B.015 (b). Change "logbook" into "log".	
response	Accepted Word changed.	
comment	505	comment by: <i>Icelandic Civil Aviation Administration</i>
	Inspection	logbook
	Suggest to elevate to AMC	
response	Partially accepted The requirement to keep a log of the routine and non-routine inspections has been elevated to AMC. The contents of the log have remained in GM.	
comment	562	comment by: <i>Flughafen Düsseldorf GmbH</i>
	Die Art und Weise der Aufzeichnung sollte freigestellt sein.	
response	Accepted This GM gives importance to what should be included in the log. The way this information is recorded and the media used rest with the aerodrome operator.	
comment	819	comment by: <i>Dublin Airport Authority</i>
	Change "Logbook" to "Log" in all instances under this section, this will allow the retention of records in either physical or electronic format.	
response	Accepted Word changed.	
comment	932	comment by: <i>Cologne/Bonn Airport</i>
	change "logbook" to Log	
response	Accepted Word changed.	
comment	1625	comment by: <i>Geneva International Airport (ROMIG)</i>
	Change the term "logbook" into "log" A log is more generic.	

response Accepted
Word changed.

comment 1699 ❖ comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS.B.015 — Monitoring and Inspection of movement area and related facilities (p150)
- AMC/GM to ANNEX III — Part-OPS —GM1-ADR-OPS.B.015 — Pavements and adjacent ground surfaces inspection (p 151)
- AMC/GM to ANNEX III — Part-OPS —GM2-ADR-OPS.B.015 — Visual Aids Inspection (p151-152)
- AMC/GM to ANNEX III — Part-OPS — GM4-ADR-OPS.B.015 — Inspection logbook (p152)
- AMC/GM to ANNEX III — Part-OPS - GM5-ADR-OPS.B.015 — Follow up of inspections (p152)
- AMC/GM to ANNEX III — Part-OPS - GM6-ADR-OPS.B.015 — Personnel requirements for movement area inspections (p152-153)

2. Justification and proposed text / comment

In paragraph (a)(4), inspection/checking of drainage systems should be extended to the stormwater collection systems available at the aerodrome. **It is consequently proposed to revise AMC-ADR-OPS.B.015 as follows:**

AMC-ADR-OPS.B.015 —Monitoring and Inspection of movement area and related facilities

"(a) The aerodrome operator should establish a monitoring and inspection program of the movement area which is commensurate with the traffic expected at the aerodrome. Inspections of the movement area should be carried out each day at least once where the code number is 1 or 2 and at least twice where the code number is 3 or 4;

The inspections should cover at least the following items:

- (1) Visual aids;*
 - (2) Other lighting systems required for the safety of aerodrome operations;*
 - (3) Pavements and adjacent ground surfaces;*
 - (4) Drainage and storm water collection systems;*
 - (5) Fencing and other access control devices;*
 - (6) The movement area environment inside the aerodrome boundary, and outside the aerodrome boundary within line of sight;*
 - (7) FOD and wildlife;*
- [...]"*

The corresponding GMs should reflect the 3 purposes of movement area inspections:

- report information to ANSPs and AIS on matters of operational significance,
- initiate appropriate maintenance including immediate corrective action (removal of FOD for instance), and
- record events to feed the aerodrome SMS. They should include

material derived from the ICAO Annex 14 Volume 1 standard 2.9.2, and proposed in the State Letter 11/41 (Ref: AN 4/1.1.52-11/41) "in order to identify any default or potential hazards to the safety of aircraft or aerodrome operations."

- **GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection**

Rubber built-up should be reported only when it may impair the runway surface friction characteristics.

Reporting of contaminants is required according to ICAO Annex 14 Volume 1 (2.9.2) and AMC-ADR-OPS.A.005.

Daily inspection of the paved surfaces of the movement area does not require to report pavement cracking. This is addressed by more specialized maintenance survey : it is proposed to delete « cracking »

It is consequently proposed to revise GM1-ADR-OPS.B.015 as follows:

GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection

"(a) [...]"

(1) *General cleanliness with particular attention to material which could cause engine ingestion damage. This may include debris from runway maintenance operations or excessive grit remaining after runway gritting. Any build-up of tire rubber deposits should be noted if it may impair the runway surface friction characteristics;*

(1bis) *Presence of contaminants such as snow, slush, ice, wet ice, wet snow on ice or frost, water, anti-icing or de-icing chemicals, mud, dust, sand, volcanic ash, oil which may impair the runway surface friction characteristics; particular attention may be given to the simultaneous presence of snow, slush, ice, wet ice, wet snow on ice with anti-icing or de-icing chemicals;*

(2) *Signs of damage to the pavement surface including ~~cracking and~~ spalling of concrete, condition of joint sealing, cracking and looseness of aggregate in asphalt surfaces or break-up of friction courses;*

[...]"

(5) *~~The general bearing strength of grass areas, particularly those close to aircraft pavement surface~~ The ability of the grass areas to support an aeroplane and to support ground vehicles which may operate on the areas;*

[...]"

GM2-ADR-OPS.B.015 – Visual Aids Inspection

Flight checks were performed by the French DGAC on CatII/III aerodromes until early 2000s'. Considering the poor added value with regard to pilot reports and ground checks, the DGAC abandoned flight checks. In addition flight checks cannot be considered as routine aerodrome inspection as they require laboratory aircraft: **it is proposed to delete paragraph (a) from GM2-ADR-OPS.B.015**

- **GM4-ADR-OPS.B.015 – Inspection logbook**

Necessary should be avoided in a GM. Findings should be avoided as they may be confused with findings of non-compliances during the audits by the competent authority: it is proposed to use "results and observations".

It is consequently proposed to revise GM4-ADR-OPS.B.015 as follows:

GM4-ADR-OPS.B.015 – Inspection logbook

~~"(a) It is necessary to keep a logbook for all the routine and non-routine inspections of the movement area and related facilities may be recorded in a logbook;~~

~~(b) The inspection logbook would ~~should~~ include:~~

- ~~(1) Details of inspection intervals and times;~~
- ~~(2) Names of persons carrying out the inspection;~~
- ~~(3) ~~Findings~~Results and observations, if any."~~

- **GM5-ADR-OPS.B.015 – Follow up of inspections**

This GM should reflect the 3 purposes of movement area inspections: report information to ANSPs and AIS on matters of operational significance, initiate appropriate maintenance including immediate corrective action (removal of FOD for instance) and record events to feed the aerodrome SMS. Hence, the following proposal:

GM5-ADR-OPS.B.015 – Follow up of inspections

"Arrangements may exist for reporting the results of inspections and for taking prompt follow-up actions to ensure correction of unsafe conditions. These arrangements would include notification to ANSP and AIS, removal of FODs and wildlife control and recording of events for analysis according to the SMS of the aerodrome operator as required."

- **GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections**

Paragraph (a) is already covered in GM4-ADR-OPS-B.015 and in Part OR-Management: it should be deleted

Findings should be avoided, and "Should" should be avoided

Works are concerned too, not only construction; reference to AMC1-ADR-OPS.B.070 (c), (d) and (e)

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

~~"(a) The names and roles of persons responsible for carrying out inspections may be designated.~~

~~(ab) Personnel who conduct inspections may receive training in at least the following areas:~~

- ~~(1) Aerodrome familiarisation, including airport signs, markings and lighting;~~
- ~~(2) Aerodrome Manual;~~
- ~~(3) Aerodrome Emergency Plan;~~
- ~~(4) Notice to Airmen (NOTAM) notification procedures;~~
- ~~(5) Aerodrome driving rules;~~
- ~~(6) Aerodrome inspection procedures and techniques;~~
- ~~(7) Procedures for reporting inspection ~~findings~~results and observations.~~

~~(c) Inspectors may use checklists covering the various inspection areas. A sketch of the aerodrome will ~~should~~ accompany the checklist so that the location of problems can be marked for easy identification.~~

~~(d) Inspectors may review the most recently completed checklist from the previous inspection cycle prior to beginning the inspection.~~

~~(e) If ~~work~~construction is in progress, inspectors ~~should be familiar with the safety plan of the construction~~ are aware of and comply with the instructions and procedures as specified in AMC1-ADR-OPS.B.070 (c), (d) and (e).~~

response Partially accepted

The comments on GM4-ADR.OPS.B.015 are partially agreed. Point (a) has been elevated to AMC because it is considered necessary to keep records

of routine and non-routine inspections. The replacement of the word 'findings' with 'results and observations' has been agreed.

comment 2003 comment by: *Munich Airport International*
(b)
change "logbook" into "log"

response Accepted
Word changed.

comment 2045 comment by: *Shannon Airport*
Change "Logbook" to "Log" in all instances under this section, this will allow the retention of records in either physical or electronic format.

response Accepted
Word changed.

comment 2475 comment by: *Isavia*
Inspection logbook
Suggest to elevate to AMC

response Partially accepted
The requirement to keep a log of the routine and non-routine inspections has been elevated to AMC. The contents of the log have remained in GM

comment 2492 comment by: *DAA Cork Airport*
Change "Logbook" to "Log" in all instances under this section, this will allow the retention of records in either physical or electronic format.

response Accepted
Word changed.

comment 2570 comment by: *ADV -German Airports Association*
GM4.ADR.OPS.B.015 (b)
change "logbook" into "log"

response Accepted
Word changed.

comment 2670 comment by: *Fraport AG*
GM4-ADR-OPS.B.015 — Inspection logbook (b)
Editorial

response

The inspection **logbook** should include:

Proposed Text

The inspection **log** should include:

Accepted

Word changed.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – GM5-ADR-OPS.B.015 – Follow up of
inspections** p. 152

comment

1699 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- AMC/GM to ANNEX III – Part-OPS –AMC-ADR-OPS.B.015 – Monitoring and Inspection of movement area and related facilities (p150)
- AMC/GM to ANNEX III – Part-OPS –GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection (p 151)
- AMC/GM to ANNEX III – Part-OPS –GM2-ADR-OPS.B.015 – Visual Aids Inspection (p151-152)
- AMC/GM to ANNEX III – Part-OPS – GM4-ADR-OPS.B.015 – Inspection logbook (p152)
- AMC/GM to ANNEX III – Part-OPS - GM5-ADR-OPS.B.015 – Follow up of inspections (p152)
- AMC/GM to ANNEX III – Part-OPS - GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections (p152-153)

2. Justification and proposed text / comment

In paragraph (a)(4), inspection/checking of drainage systems should be extended to the stormwater collection systems available at the aerodrome. **It is consequently proposed to revise AMC-ADR-OPS.B.015 as follows:**

AMC-ADR-OPS.B.015 –Monitoring and Inspection of movement area and related facilities

"(a) The aerodrome operator should establish a monitoring and inspection program of the movement area which is commensurate with the traffic expected at the aerodrome. Inspections of the movement area should be carried out each day at least once where the code number is 1 or 2 and at least twice where the code number is 3 or 4;

The inspections should cover at least the following items:

- (1) Visual aids;*
- (2) Other lighting systems required for the safety of aerodrome operations;*
- (3) Pavements and adjacent ground surfaces;*
- (4) Drainage and storm water collection systems;*
- (5) Fencing and other access control devices;*
- (6) The movement area environment inside the aerodrome boundary, and*

*outside the aerodrome boundary within line of sight;
(7) FOD and wildlife;
[...]”*

The corresponding GMs should reflect the 3 purposes of movement area inspections:

- report information to ANSPs and AIS on matters of operational significance,
- initiate appropriate maintenance including immediate corrective action (removal of FOD for instance), and
- record events to feed the aerodrome SMS. They should include material derived from the ICAO Annex 14 Volume 1 standard 2.9.2, and proposed in the State Letter 11/41 (Ref: AN 4/1.1.52-11/41) *“in order to identify any default or potential hazards to the safety of aircraft or aerodrome operations.”*

- **GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection**

Rubber built-up should be reported only when it may impair the runway surface friction characteristics.

Reporting of contaminants is required according to ICAO Annex 14 Volume 1 (2.9.2) and AMC-ADR-OPS.A.005.

Daily inspection of the paved surfaces of the movement area does not require to report pavement cracking. This is addressed by more specialized maintenance survey : it is proposed to delete « cracking »

It is consequently proposed to revise GM1-ADR-OPS.B.015 as follows:

GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection

“(a) [...]

(1) General cleanliness with particular attention to material which could cause engine ingestion damage. This may include debris from runway maintenance operations or excessive grit remaining after runway gritting. Any build-up of tire rubber deposits should be noted if it may impair the runway surface friction characteristics;

(1bis) Presence of contaminants such as snow, slush, ice, wet ice, wet snow on ice or frost, water, anti-icing or de-icing chemicals, mud, dust, sand, volcanic ash, oil which may impair the runway surface friction characteristics; particular attention may be given to the simultaneous presence of snow, slush, ice, wet ice, wet snow on ice with anti-icing or de-icing chemicals;

(2) Signs of damage to the pavement surface including ~~cracking and spalling of concrete~~, condition of joint sealing, cracking and looseness of aggregate in asphalt surfaces or break-up of friction courses;

[...]

(5) ~~The general bearing strength of grass areas, particularly those close to aircraft pavement surface~~ The ability of the grass areas to support an aeroplane and to support ground vehicles which may operate on the areas;

[...]”

GM2-ADR-OPS.B.015 – Visual Aids Inspection

Flight checks were performed by the French DGAC on CatII/III

aerodromes until early 2000s'. Considering the poor added value with regard to pilot reports and ground checks, the DGAC abandoned flight checks. In addition flight checks cannot be considered as routine aerodrome inspection as they require laboratory aircraft: **it is proposed to delete paragraph (a) from GM2-ADR-OPS.B.015**

- **GM4-ADR-OPS.B.015 – Inspection logbook**

Necessary should be avoided in a GM. Findings should be avoided as they may be confused with findings of non-compliances during the audits by the competent authority: it is proposed to use "results and observations".

It is consequently proposed to revise GM4-ADR-OPS.B.015 as follows:

GM4-ADR-OPS.B.015 – Inspection logbook

"(a) ~~It is necessary to keep a logbook for all the routine and non-routine inspections of the movement area and related facilities~~ may be recorded in a logbook;

(b) The inspection logbook ~~would should~~ include:

- (1) Details of inspection intervals and times;*
- (2) Names of persons carrying out the inspection;*
- (3) ~~Findings~~Results and observations, if any."*

- **GM5-ADR-OPS.B.015 – Follow up of inspections**

This GM should reflect the 3 purposes of movement area inspections: report information to ANSPs and AIS on matters of operational significance, initiate appropriate maintenance including immediate corrective action (removal of FOD for instance) and record events to feed the aerodrome SMS. Hence, the following proposal:

GM5-ADR-OPS.B.015 – Follow up of inspections

"Arrangements may exist for reporting the results of inspections and for taking prompt follow-up actions to ensure correction of unsafe conditions. These arrangements would include notification to ANSP and AIS, removal of FODs and wildlife control and recording of events for analysis according to the SMS of the aerodrome operator as required."

- **GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections**

Paragraph (a) is already covered in GM4-ADR-OPS-B.015 and in Part OR-Management: it should be deleted

Findings should be avoided, and "Should" should be avoided

Works are concerned too, not only construction; reference to AMC1-ADR-OPS.B.070 (c), (d) and (e)

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

"(a) ~~The names and roles of persons responsible for carrying out inspections may be designated.~~

(ab) Personnel who conduct inspections may receive training in at least the following areas:

(1) Aerodrome familiarisation, including airport signs, markings and lighting;

(2) Aerodrome Manual;

(3) Aerodrome Emergency Plan;

(4) Notice to Airmen (NOTAM) notification procedures;

(5) Aerodrome driving rules;

(6) Aerodrome inspection procedures and techniques;

(7) Procedures for reporting inspection ~~findings~~results and observations.

(c) Inspectors may use checklists covering the various inspection areas. A

sketch of the aerodrome ~~will~~ ~~should~~ accompany the checklist so that the location of problems can be marked for easy identification.
 (d) Inspectors may review the most recently completed checklist from the previous inspection cycle prior to beginning the inspection.
 (e) If ~~work~~ ~~construction~~ is in progress, inspectors ~~should be familiar with the safety plan of the construction~~ are aware of and comply with the instructions and procedures as specified in AMC1-ADR-OPS.B.070 (c), (d) and (e).

response Accepted

For GM5-ADR-OPS.B.015 the comment is agreed.
Text has been revised in order to reflect the proposal.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR-OPS.B) – GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections p. 152-153

comment 506 comment by: *Icelandic Civil Aviation Administration*
 Personnel requirements for movement area inspections
 Suggest to elevate to AMC

response Noted

comment 1699 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- AMC/GM to ANNEX III – Part-OPS –AMC-ADR-OPS.B.015 – Monitoring and Inspection of movement area and related facilities (p150)
- AMC/GM to ANNEX III – Part-OPS –GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection (p 151)
- AMC/GM to ANNEX III – Part-OPS –GM2-ADR-OPS.B.015 – Visual Aids Inspection (p151-152)
- AMC/GM to ANNEX III – Part-OPS – GM4-ADR-OPS.B.015 – Inspection logbook (p152)
- AMC/GM to ANNEX III – Part-OPS - GM5-ADR-OPS.B.015 – Follow up of inspections (p152)
- AMC/GM to ANNEX III – Part-OPS - GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections (p152-153)

2. Justification and proposed text / comment

In paragraph (a)(4), inspection/checking of drainage systems should be extended to the stormwater collection systems available at the aerodrome.
It is consequently proposed to revise AMC-ADR-OPS.B.015 as follows:

AMC-ADR-OPS.B.015 –Monitoring and Inspection of movement area and related facilities

"(a) The aerodrome operator should establish a monitoring and inspection

program of the movement area which is commensurate with the traffic expected at the aerodrome. Inspections of the movement area should be carried out each day at least once where the code number is 1 or 2 and at least twice where the code number is 3 or 4;

The inspections should cover at least the following items:

- (1) Visual aids;*
 - (2) Other lighting systems required for the safety of aerodrome operations;*
 - (3) Pavements and adjacent ground surfaces;*
 - (4) Drainage and storm water collection systems;*
 - (5) Fencing and other access control devices;*
 - (6) The movement area environment inside the aerodrome boundary, and outside the aerodrome boundary within line of sight;*
 - (7) FOD and wildlife;*
- [...]”*

The corresponding GMs should reflect the 3 purposes of movement area inspections:

- report information to ANSPs and AIS on matters of operational significance,
- initiate appropriate maintenance including immediate corrective action (removal of FOD for instance), and
- record events to feed the aerodrome SMS. They should include material derived from the ICAO Annex 14 Volume 1 standard 2.9.2, and proposed in the State Letter 11/41 (Ref: AN 4/1.1.52-11/41) *“in order to identify any default or potential hazards to the safety of aircraft or aerodrome operations.”*

- **GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection**

Rubber built-up should be reported only when it may impair the runway surface friction characteristics.

Reporting of contaminants is required according to ICAO Annex 14 Volume 1 (2.9.2) and AMC-ADR-OPS.A.005.

Daily inspection of the paved surfaces of the movement area does not require to report pavement cracking. This is addressed by more specialized maintenance survey : it is proposed to delete « cracking »

It is consequently proposed to revise GM1-ADR-OPS.B.015 as follows:

GM1-ADR-OPS.B.015 – Pavements and adjacent ground surfaces inspection

“(a) [...]

(1) General cleanliness with particular attention to material which could cause engine ingestion damage. This may include debris from runway maintenance operations or excessive grit remaining after runway gritting. Any build-up of tire rubber deposits should be noted if it may impair the runway surface friction characteristics;

(1bis) Presence of contaminants such as snow, slush, ice, wet ice, wet snow on ice or frost, water, anti-icing or de-icing chemicals, mud, dust, sand, volcanic ash, oil which may impair the runway surface friction characteristics; particular attention may be given to the simultaneous presence of snow, slush, ice, wet ice, wet snow on ice with anti-icing or de-icing chemicals;

(2) Signs of damage to the pavement surface including ~~cracking and spalling of concrete, condition of joint sealing, cracking and looseness of aggregate in asphalt surfaces or break-up of friction courses;~~

[...]

(5) ~~The general bearing strength of grass areas, particularly those close to aircraft pavement surface~~ The ability of the grass areas to support an aeroplane and to support ground vehicles which may operate on the areas;

[...]"

GM2-ADR-OPS.B.015 – Visual Aids Inspection

Flight checks were performed by the French DGAC on CatII/III aerodromes until early 2000s'. Considering the poor added value with regard to pilot reports and ground checks, the DGAC abandoned flight checks. In addition flight checks cannot be considered as routine aerodrome inspection as they require laboratory aircraft: **it is proposed to delete paragraph (a) from GM2-ADR-OPS.B.015**

GM4-ADR-OPS.B.015 – Inspection logbook

Necessary should be avoided in a GM. Findings should be avoided as they may be confused with findings of non-compliances during the audits by the competent authority: it is proposed to use "results and observations".

It is consequently proposed to revise GM4-ADR-OPS.B.015 as follows:

GM4-ADR-OPS.B.015 – Inspection logbook

~~"(a) It is necessary to keep a logbook for all the routine and non-routine inspections of the movement area and related facilities may be recorded in a logbook;~~

(b) The inspection logbook ~~would should~~ include:

- (1) Details of inspection intervals and times;
- (2) Names of persons carrying out the inspection;
- (3) ~~Findings~~Results and observations, if any."

GM5-ADR-OPS.B.015 – Follow up of inspections

This GM should reflect the 3 purposes of movement area inspections: report information to ANSPs and AIS on matters of operational significance, initiate appropriate maintenance including immediate corrective action (removal of FOD for instance) and record events to feed the aerodrome SMS. Hence, the following proposal:

GM5-ADR-OPS.B.015 – Follow up of inspections

~~"Arrangements may exist for reporting the results of inspections and for taking prompt follow-up actions to ensure correction of unsafe conditions. These arrangements would include notification to ANSP and AIS, removal of FODs and wildlife control and recording of events for analysis according to the SMS of the aerodrome operator as required."~~

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

Paragraph (a) is already covered in GM4-ADR-OPS-B.015 and in Part OR-Management: it should be deleted

Findings should be avoided, and "Should" should be avoided

Works are concerned too, not only construction; reference to AMC1-ADR-OPS.B.070 (c), (d) and (e)

GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections

~~"(a) The names and roles of persons responsible for carrying out~~

~~inspections may be designated.~~
 (ab) Personnel who conduct inspections may receive training in at least the following areas:
 (1) Aerodrome familiarisation, including airport signs, markings and lighting;
 (2) Aerodrome Manual;
 (3) Aerodrome Emergency Plan;
 (4) Notice to Airmen (NOTAM) notification procedures;
 (5) Aerodrome driving rules;
 (6) Aerodrome inspection procedures and techniques;
 (7) Procedures for reporting inspection findings **results and observations.**
 (c) Inspectors may use checklists covering the various inspection areas. A sketch of the aerodrome ~~will~~ **should** accompany the checklist so that the location of problems can be marked for easy identification.
 (d) Inspectors may review the most recently completed checklist from the previous inspection cycle prior to beginning the inspection.
 (e) If ~~work~~**construction** is in progress, inspectors ~~should be familiar with the safety plan of the construction~~ **are aware of and comply with the instructions and procedures as specified in AMC1-ADR-OPS.B.070 (c), (d) and (e).**

response

Partially accepted

It is very important that movement area inspections are performed by specific personnel holding the necessary qualifications and training and their role described.
 The word 'finding' has been replaced with the words 'results and observations' The purpose of point (e) is to highlight the need for the aerodrome inspectors to be aware of the safety plan of the works or construction in order to ensure that is followed.

comment

2076 comment by: AENA - Aeropuertos Españoles y Navegación Aérea
 Paragraph (a) is already covered in GM4-ADR-OPS-B.015 and in Part OR-Management: it should be deleted
GM6-ADR-OPS.B.015 – Personnel requirements for movement area inspections
~~"(a) The names and roles of persons responsible for carrying out inspections may be designated.~~
 (ab) Personnel who conduct inspections may receive training in at least the following areas:

response

Noted

Point (a) in GM4-ADR.OPS.B.015 deals with the information that should be included in the inspection log, while point (a) in GM6 - ADR.OPS.B.015 refers to the designation of persons entitled to perform movement area inspections.

comment	<p>676 comment by: <i>Aéroport La Rochelle - LRH/LFBH</i></p> <p>Attachment #186</p> <p>LFBH NPA 2011-20 (B.II) AMC-ADR-OPS.B.020</p> <p>Référence : AMC-ADR-OPS.B.020 Wildlife Strike Hazard Reduction</p> <p>Proposition/commentaire (2) Il convient de modifier de la manière suivante: « record and report to the competent authority wildlife strikes to aircraft occured at the aerodrome; »</p> <p>Justification L'exploitant d'aérodrome ne doit rapporter que les impacts d'oiseaux qui se sont produits sur son aérodrome et pas ceux qui se sont produits soit en route soit sur un autre aérodrome. Dans le cas où le lieu de l'impact n'est pas avéré, il existe des règles internationales donnant l'obligation à la compagnie aérienne ou au service de maintenance de rapporter l'évènement.</p>						
response	<p>Accepted</p> <p>(a) (2) has been revised to include the proposal.</p>						
comment	<p>688 comment by: <i>Munich Airport International</i></p> <p><u>(a)</u></p> <p>(2): delete</p> <p>Justification: It should be the duty of the competent authority to issue rules for the airlines to record and report wildlife strikes to aircraft</p>						
response	<p>Partially accepted</p> <p>The aerodrome operator is also responsible to report wildlife strikes to the competent authority.</p>						
comment	<p>730 comment by: <i>ADP : Aeroports de Paris</i></p> <table border="1" style="width: 100%;"> <tr> <td data-bbox="383 1612 782 1691">Référence : AMC-ADR-OPS.B.020</td> <td data-bbox="782 1612 1388 1691">Wildlife Strike Hazard Reduction</td> </tr> <tr> <td data-bbox="383 1691 782 1859">Proposition/commentaire</td> <td data-bbox="782 1691 1388 1859">(2) Il convient de modifier de la manière suivante: « record and report to the competent authority wildlife strikes to aircraft occured at the aerodrome; »</td> </tr> <tr> <td data-bbox="383 1859 782 1993">Justification</td> <td data-bbox="782 1859 1388 1993">L'exploitant d'aérodrome ne doit rapporter que les impacts d'oiseaux qui se sont produits sur son aérodrome et pas ceux qui se sont produits soit en route soit sur un</td> </tr> </table>	Référence : AMC-ADR-OPS.B.020	Wildlife Strike Hazard Reduction	Proposition/commentaire	(2) Il convient de modifier de la manière suivante: « record and report to the competent authority wildlife strikes to aircraft occured at the aerodrome ; »	Justification	L'exploitant d'aérodrome ne doit rapporter que les impacts d'oiseaux qui se sont produits sur son aérodrome et pas ceux qui se sont produits soit en route soit sur un
Référence : AMC-ADR-OPS.B.020	Wildlife Strike Hazard Reduction						
Proposition/commentaire	(2) Il convient de modifier de la manière suivante: « record and report to the competent authority wildlife strikes to aircraft occured at the aerodrome ; »						
Justification	L'exploitant d'aérodrome ne doit rapporter que les impacts d'oiseaux qui se sont produits sur son aérodrome et pas ceux qui se sont produits soit en route soit sur un						

	<p>autre aéroport. Dans le cas où le lieu de l'impact n'est pas avéré, il existe des règles internationales donnant l'obligation à la compagnie aérienne ou au service de maintenance de rapporter l'évènement.</p>
Traduction de courtoisie	<p>(2) It is appropriate to modify in the following way : « record and report to the competent authority wildlife strikes to aircraft <u>occured at the aerodrome</u>; »</p> <p>The aerodrome operator must report only wildlife strikes that occur on his aerodrome and not the ones that occur on route or on another aerodrome. Wen we do not know where it exactly occurs, there is international rules that oblige the airline or the maintenance service to report the event.</p>

response Accepted
(a) (2) has been revised to include the proposal.

comment 977 comment by: *Union des Aéroports français - UAF*
Attachment [#187](#)
UAF NPA 2011-20 (B.II) AMC-ADR-OPS.B.020
Référence Wildlife Strike : Hazard AMC-ADR-OPS.B.020 Reduction
Traduction de courtoisie
(2) It is appropriate to modify in the following way : « record and report to the competent authority wildlife strikes to aircraft occured at the aerodrome; »
The aerodrome operator must report only wildlife strikes that occur on his aerodrome and not the ones that occur on route or on another aerodrome. Wen we do not know where it exactly occurs, there is international rules that oblige the airline or the maintenance service to report the event.

response Accepted
(a) (2) has been revised to include the proposal.

comment 1384 comment by: *Euroairport Bâle-Mulhouse*
Attachment [#188](#)
Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC-ADR-OPS.B.020
Référence Wildlife Strike : Hazard AMC-ADR-OPS.B.020 Reduction

	<p>Traduction de courtoisie (2) It is appropriate to modify in the following way : « record and report to the competent authority wildlife strikes to aircraft occurred at the aerodrome; » The aerodrome operator must report only wildlife strikes that occur on his aerodrome and not the ones that occur on route or on another aerodrome. When we do not know where it exactly occurs, there is international rules that oblige the airline or the maintenance service to report the event.</p>
response	<p>Accepted (a) (2) has been revised to include the proposal.</p>
comment	<p>1577 comment by: <i>ECA - European Cockpit Association</i> Add following paragraph: (a)(5) The appropriate authority should take action to eliminate or to prevent the establishment of garbage disposal dumps or any other source which may attract wildlife to the aerodrome, or its vicinity (13km). Justification: It has been recognised that certain National Authorities are more aware of the bird/ wildlife hazard issue than others. In this context we believe that this paragraph should be added. It has been developed with close reference to, amongst others, the following documents: a) US FAA Wildlife Hazard Management at Airports, second edition 2005 b) UK CAA, CAP 680 Aerodrome Bird Control c) IBIS Standards For Aerodrome Bird/Wildlife Control d) ICAO Airport Service Manual. Part 3 Doc.9137 e) ACI Aerodrome Bird Hazard Prevention and Wildlife Management Handbook Reference: IFALPA Annex 14, paragraph 9.4.4</p>
response	<p>Noted Refer to Cover Regulation and ADR.AR.C.060 for further information.</p>
comment	<p>1737 comment by: <i>Aéroport de Marseille - MRS/LFML</i> (2) It is appropriate to modify in the following way : « record and report to the competent authority wildlife strikes to aircraft occurred at the aerodrome; » The aerodrome operator must report only wildlife strikes that occur on his aerodrome and not the ones that occur on route or on another aerodrome. When we do not know where it exactly occurs, there is international rules that oblige the airline or the maintenance service to report the event.</p>
response	<p>Accepted (a) (2) has been revised to include the proposal.</p>
comment	<p>1798 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i> Attachment #189</p>

	UAF	NPA	2011-20	(B.II)	AMC-ADR-OPS.B.020
	Référence		:		AMC-ADR-OPS.B.020
	Wildlife	Strike		Hazard	Reduction
	Traduction de courtoisie				
	(2) It is appropriate to modify in the following way : « record and report to the competent authority wildlife strikes to aircraft occurred at the aerodrome; »				
	The aerodrome operator must report only wildlife strikes that occur on his aerodrome and not the ones that occur on route or on another aerodrome. When we do not know where it exactly occurs, there is international rules that oblige the airline or the maintenance service to report the event.				
response	Accepted				
	(a) (2) has been revised to include the proposal.				
comment	1867	comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i>			
	Attachment #190				
	ADBM - NPA 2011-20 (B.II) AMC-ADR-OPS.B.020				
	Référence		:		AMC-ADR-OPS.B.020
	Wildlife	Strike		Hazard	Reduction
	Traduction de courtoisie				
	(2) It is appropriate to modify in the following way : « record and report to the competent authority wildlife strikes to aircraft occurred at the aerodrome; »				
	The aerodrome operator must report only wildlife strikes that occur on his aerodrome and not the ones that occur on route or on another aerodrome. When we do not know where it exactly occurs, there is international rules that oblige the airline or the maintenance service to report the event.				
response	Accepted				
	(a) (2) has been revised to include the proposal.				
comment	1884	comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i>			
	(2) It is appropriate to modify in the following way : « record and report to the competent authority wildlife strikes to aircraft occurred at the aerodrome; »				
	The aerodrome operator must report only wildlife strikes that occur on his aerodrome and not the ones that occur on route or on another aerodrome. When we do not know where it exactly occurs, there is international rules that oblige the airline or the maintenance service to report the event.				
response	Accepted				
	(a) (2) has been revised to include the proposal.				

comment 2264 comment by: *Airport Nuremberg - NUE/EDDN*
The aerodrome operator can only implement measures on the aerodrome not in the vicinity or surrounding. The aerodrome operator cannot take physical or legal action to prevent risks. This is part of the authority.

response Noted
Article 8a.4 of the BR requires the aerodrome operator to take mitigating measures within its competence when activities and developments in the aerodrome surroundings may cause unacceptable safety risks to aviation.

comment 2328 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence : AMC-ADR-OPS.B.020	Wildlife Strike Hazard Reduction
Proposition/commentaire	(2) Il convient de modifier de la manière suivante: « record and report to the competent authority wildlife strikes to aircraft occured at the aerodrome ; »
Justification	L'exploitant d'aérodrome ne doit rapporter que les impacts d'oiseaux qui se sont produits sur son aérodrome et pas ceux qui se sont produits soit en route soit sur un autre aérodrome. Dans le cas où le lieu de l'impact n'est pas avéré, il existe des règles internationales donnant l'obligation à la compagnie aérienne ou au service de maintenance de rapporter l'évènement.
Traduction de courtoisie	(2) It is appropriate to modify in the following way : « record and report to the competent authority wildlife strikes to aircraft occured at the aerodrome ; » The aerodrome operator must report only wildlife strikes that occur on his aerodrome and not the ones that occur on route or on another aerodrome. When we do not know where it exactly occurs, there is international rules that oblige the airline or the maintenance service to report the event.

response Accepted
(a) (2) has been revised to include the proposal.

Assessment

comment	53	comment by: Airtrace
	It is not possible to carry out a risk analysis using only wildlife strikes data. It is necessary to include as well information on the presence of species, the number of individuals and their biology. Each animal can present a potential risk. MANIRA-Airport® Analysis Methodology for the Indicative Level of Wildlife Risk on an airport allows to carry out a risk analysis including all these factors.	
response	Accepted Text has been revised.	
comment	118	comment by: Zürich Airport
	<i>The requirements in GM1and GM2-ADR-OPS.B.020 wildlife risk assessment and management program is unrealistic and represents an overkill without any safety benefit acc. ALARP</i> <i>to be aligned with the national nature conservation and hunting regulation, A additional safety benefit is questionable !?</i>	
response	Noted The Agency does not agree with this statement. Assessment of the wildlife hazard can only be done through a proper risk assessment.	
comment	1350	comment by: East Midlands Airport - EMA/EGNX
	"The aerodrome operator may", use of the word "may" leaves the material that follows in points 1 - 3 as open to interpretation. Surely wildlife risk assessment is an essential part of a Wildlife Management Plan, so the word "should" could replace "may".	
response	Accepted Text revised accordingly.	
comment	1455	comment by: East Midlands Airport - EMA/EGNX
	(a) (1) requires use of strike data. Is this airport / national or international strike data? Smaller airports generate very few strikes and will have a poor dataset on which to base decisions. Even large airports with large datasets show substantial variations from year to year. High risk species that are present at an airport may not have yet been struck.	
response	Noted The Agency shares this view but the purpose of this GM is to identify some key elements that should be considered when conducting a wildlife risk assessment. Many times, when data are not available, the use of national	

or international data is an option.

comment 1471 comment by: *East Midlands Airport - EMA/EGNX*
(a) Point 2; Again as per point 1 comment, which dataset should be used? Even at National level, the UK database suggests that starlings are low risk. However, there have been incidents in Italy, USA and the Netherlands where large transport aircraft were totally disabled by large flocks of such birds. Without a direct relation to the correct dataset this approach is flawed.

response Noted
(a) (1) has been revised in order to include as well the number of individual birds.

comment 1547 comment by: *East Midlands Airport - EMA/EGNX*
(a) Point 3; Requirement to target actions on those species which occur with the highest frequency and create the greatest damage. Definition required as to what 'highest frequency' is being referred to, is it strikes or presence on the airfield. Would suggest the latter.

response Accepted
Text revised accordingly.

comment 2087 comment by: *IATA*
GM1-ADR-OPS.B.020 – Wildlife Risk Assessment
(b) Wildlife risk assessments may be made by competent personnel.

Change
The text is vague saying that the assessment may be made and it has to be changed to read:
(b) Wildlife risk assessments **has to** be made by competent personnel.

response Accepted
Text revised accordingly.

comment 2265 comment by: *Airport Nuremberg - NUE/EDDN*
(2) aerodrome operators do not necessarily get any information on strike damages, therefore an assessment of those is not possible.

response Noted
This GM should be read in conjunction with GM4-ADR.OPS.B.020, which has also been revised.

comment 2510 comment by: *AEA - Association of European Airlines*
GM1-ADR-OPS.B.020 – Wildlife Risk Assessment

	<p>(b) Wildlife risk assessments may be made by competent personnel.</p> <p>Comments Change</p> <p>The text is vague saying that the assessment may be made and it has to be changed to read:</p> <p>(b) Wildlife risk assessments has to be made by competent personnel.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM2-ADR-OPS.B.020 – Wildlife Risk Management Program</p>	<p>p. 153-154</p>
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comment	<p>54</p> <p>comment by: <i>Airtrace</i></p> <p>(a) Assignment of personnel should include the personnel in charge to register data after a wildlife strike. Data about wildlife strikes represent the information upon which wildlife hazard prevention is based. Knowledge about all species involved in collision is necessary to implement efficient measures.</p>
response	<p>Noted</p>

comment	<p>288</p> <p>comment by: <i>Zürich Airport</i></p> <p>change from; (2) a person who oversees the daily activities and analyses the collected data and carry out risk assessments in order to develop and implement the wildlife risk management programme;</p> <p>to; (2) a person who oversees the wildlife activities and analyses the collected data and carry out risk assessments in order to develop and implement the wildlife risk management programme;</p> <p>change from; (d) a process of habitat and land management both on and in its vicinity in order to reduce the attractiveness of the area to birds/wildlife;</p> <p>to;(d) a process of habitat and land management on the aerodrome in order to reduce the attractiveness of the area to birds/wildlife;</p> <p>delete; (e) a process to expel or remove hazardous birds/wildlife, including by</p>
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	<p>lethal means where appropriate;</p> <p>due to the fact the national regulations will overrule the EASA requirements</p> <p>(f) a process for liaison with non-airport agencies and local landowners etc. to ensure the airport is aware of developments that may contribute to creating additional bird hazards within the airport vicinity's infrastructure, vegetation, land use and activities (for example crop harvesting, seed planting, ploughing, establishment of land or water features, hunting, etc. that might attract birds/wildlife).</p> <p>due to the fact that the aereodrome operator not responsible in the surrounding area of the aerodrome.</p>
response	<p>Noted</p> <p>For (a) (2) the comment is partially agreed. It is considered necessary to identify a person who is responsible for overseeing the daily wildlife control activities</p> <p>For (d) and (f) the comments are not agreed. The purpose of this GM is to identify the required elements of a wildlife risk management programme. Responsibilities' issues are described in the Implementing Rule and AMC.</p> <p>For (e) the comment is partially agreed, because hazardous birds/wildlife could be removed without using lethal weapons.</p>
comment	<p>492 comment by: <i>CAA Austria - Ministry of Transport</i></p> <p>" vicinity" whenever possible</p> <p>It is not always possible to take action to eliminate or to prevent the establishment of any source of activity which may attract wildlife in the vicinity of an aerodrome.</p> <p>In Austria the competent authority could only discuss the problems with the local governments.</p>
response	<p>Accepted</p> <p>Point (d) has been revised to address the proposal.</p>
comment	<p>689 comment by: <i>Munich Airport International</i></p> <p><u>(d)</u></p> <p>replace "and in its vicinity" with "airport grounds within and outside the fence"</p> <p>justification: The aerodrome operator should not be responsible for the surrounding of the aerodrome because he has no legal hold for measures (e.g. biotope management) when the property does</p>

	not belong to him
response	Partially accepted The purpose of this GM is to identify the required elements of a wildlife risk management programme. Responsibilities' issues are described in the Implementing Rule and AMC.
comment	937 comment by: <i>German Birdstrike Committee</i> (d) habitat management in the airport vicinity is the task of the competent authority and not the one of the aerodrome operator. The aerodrome operator has no competence in the vicinity of the aerodrome.
response	Partially accepted The purpose of this GM is to identify the required elements of a wildlife risk management programme. Responsibilities' issues are described in the Implementing Rule and AMC.
comment	962 comment by: <i>Cologne/Bonn Airport</i> (d) : this should also be adresses to the competent authority in AR
response	Noted
comment	1565 comment by: <i>East Midlands Airport - EMA/EGNX</i> Statement reads "The wildlife risk management programme may include at least the followng elements": This appears to be a long way from a robust standard, could be enhanced by changing the word "may" to "should".
response	Accepted Text revised.
comment	1587 comment by: <i>East Midlands Airport - EMA/EGNX</i> (f) Doesn't refer to the airport involvement in the Local Planning Process.
response	Noted See Cover Regulation.
comment	2004 comment by: <i>Munich Airport International</i> (d) This should also adress the comptent authority within AR
response	Noted
comment	2267 comment by: <i>Airport Nuremberg - NUE/EDDN</i> (d) habitat management in the vicinity of an airport lies in the

	responsibility of the competent authority.
response	Partially accepted The purpose of this GM is to identify the required elements of a wildlife risk management programme. Responsibilities' issues are described in the Implementing Rule and AMC.
comment	2571 comment by: <i>ADV -German Airports Association</i> GM2.ADR.OPS.B.020 (d) This should also address the competent authority within AR
response	Noted

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM3-ADR-OPS.B.020 – Wildlife training p. 154-155

comment	55 comment by: <i>Airtrace</i> lettre (d): The personnel in charge of wildlife hazard prevention must successfully complete an airport wildlife training course. However, there is today no standard Wildlife Hazard Prevention Diploma. The successful completion of a training course with a written and/or practical test and an agreed pass score has a validity only if the training and test are recognized and generally approved. France has implemented a minimum standard through its legislation. Specialized centers such as Airtrace have a developed reknown training courses. lettre (e): The use of best-practice models for wildlife hazard prevention agents is recommended, but the specific characteristics of each airport must be kept in mind. Each airport needs a specific environmental analysis and risk assessment. Best-practice models are not applicable as such for every airport. A full knowledge of the airport and its surroundings is necessary to implement efficient measures.
response	Noted
comment	119 comment by: <i>Zürich Airport</i> <i>to be reduced to an acceptable level: to be aligned with the national nature conservation and hunting regulation, A additional safety benefit is questionable !?</i>
response	Noted
comment	221 comment by: <i>KLM</i>

	Change
	The text is vague saying that the assessment may be made and it has to be changed to read: (b) Wildlife risk assessments has to be made by competent personnel.
response	Accepted Text revised.

comment	690 <i>comment by: Munich Airport International</i>
	<u>(d)</u> delete Justification: the suggested implementation of a written and practical test would be an extraordinary burden for the airport operator <u>(e)</u> (11): delete "and how these programs integrate with the aerodrome's safety management system" Justification: the integration of a wildlife strike risk assessment and risk management principles into the aerodrome's safety management system is not reasonable <u>(g)</u> replace "annual" with "regular", delete "acceptable to the competent authority" Justification: there should be no fixed time interval for a refresher training. The airport operator should define the adequate time frame
response	Accepted The comment on (d) is accepted and (d) is deleted. The comment on (e) (11) is not agreed. On the contrary, we believe that wildlife strike risk assessments are generally considered also safety risks assessments, and fall under the supervision/oversight of safety management. The comment on (g) is accepted. Point (g) is revised to address the comment.

comment	1590 <i>comment by: East Midlands Airport - EMA/EGNX</i>
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	Suggest reword (a) to read; "It is necessary for aerodrome wildlife control personnel to receive formal training prior to their initial engagement as wildlife controllers".
response	Accepted The text has been revised but not as suggested.

comment	1592 comment by: <i>East Midlands Airport - EMA/EGNX</i> (b) Very generic phraseology used, leaving the material open to interpretation. Training is an essential part of wildlife control, therefore "may" should be replaced by "should".
response	Accepted Text revised.

comment	1597 comment by: <i>East Midlands Airport - EMA/EGNX</i> (d) Successful completion of an airport wildlife training course is demonstrated by completion of a written and/or practical test to an agreed pass score. Agreed by whom ? EASA or CAA ? Also Who will set and/or approve the test papers
response	Accepted Text deleted.

comment	1599 comment by: <i>East Midlands Airport - EMA/EGNX</i> Suggest rewording to read: "It is necessary for wildlife control staff to be fully aware of the conditions and terms of the operation of the aerodrome environment. Where this is not relevant, the wildlife control personnel should receive appropriate training, including"
response	Accepted The text has been revised but not as suggested.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM4-ADR-OPS.B.020 – Recording and reporting of wildlife strikes and observed wildlife	p. 155-156
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comment	189 comment by: <i>SWISS AERODROMES ASSOCIATION</i> Recording of observations is not justified and should therefore be deleted
response	Not accepted Recording of wildlife activity is very important to assess the wildlife hazard at the aerodrome and to identify areas where additional mitigation

measures are required.

comment	507 comment by: <i>Icelandic Civil Aviation Administration</i> GM4-ADR-OPS.B.020 (d) - Recording and reporting of wildlife strikes and observed wildlife Suggest to make an AMC out of (d)
response	Noted The requirement for recording of wildlife strikes has already been addressed in the Implementing Rule and in the AMC. This could be done using various means.

comment	1205 comment by: <i>Federal Office of Civil Aviation FOCA</i> Typo in article (a), (2): Change article to "Action taken to disperse birds/wildlife and the results of these actions". The article should be limited to the strikes only and exclude the observations. This goes beyond the scope and may be a resource problem for aerodrome operators.
response	Noted It is expected that when wildlife activity is observed at the aerodrome and is likely to create problems in flight operations, disperse measures should be taken. The reason for recording these actions is to evaluate their effectiveness afterwards.

comment	1600 comment by: <i>East Midlands Airport - EMA/EGNX</i> (a) It is necessary to maintain a record of all wildlife activity or 'bird/wildlife log'. The log may include at least the following information: Comment: Very generic and leaving the material open to interpretation. The log "should" include the following information:
response	Accepted Text revised accordingly.

comment	2024 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i> Limit to strikes only and exclude the observations. This would be a great burden to some aerodromes.
response	Noted It is expected that when wildlife activity is observed at the aerodrome and is likely to create problems in flight operations, disperse measures should be taken. The reason for recording these actions is to evaluate their effectiveness afterwards.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – AMC-OPS.B.025 – Operation of
vehicles** p. 156

comment 172 comment by: *Swedavia AB - Swedish airports (currently 11 airports)*

(a) (2) needs clarification where it states that it is valid for aerodromes performing these services. Other parties performing these services should include this as their services.

response Partially accepted

The intention of the proposed AMC is to establish the basic framework for airside driving. The responsibility to establish such framework is on the aerodrome operator, however, the aerodrome operator is not the only one allowed to provide such training.

comment 267 comment by: *CAA Norway*

We suggest to delete the word "health" in AMC-OPS.B.025 (a)(1) on page 156 as this is not aviation safety. Therefore take out "...and the health and safety .." in the beginning of line 2. What is meant by "plant" in line 2? We suggest to delete the word "plant" and keep only "...vehicles and equipment..". We suggest to rewrite the end of this paragraph as the movement area includes manoeuvring area and aprons and stands. Considering these comments; here is a suggestion for the rewording of subparagraph (1): **"A generic airside vehicle driver training programme which covers operational safety aspects of operating vehicles and equipment in close proximity to aircraft on the movement area, such as; runways, taxiways, aprons, stands, and relevant adjacent areas to the movement area."**

response Accepted

Text revised to address the proposal.

comment 452 comment by: *Estonian CAA*

"Suggest to delete the word ""health"" in AMC-OPS.B.025 (a)(1) on page 156 as this is not aviation safety. Therefore take out ""...and the health and safety .."" in the beginning of line 2. What is meant by ""plant"" in line 2? We suggest to delete the word ""plant"" and keep only "...vehicles and equipment...". We suggest to rewrite the end of this para as the movement area includes manoeuvring area and aprons and stands. Considering these comments; here is a suggestion for the rewording of subparagraph (1): ""A generic airside vehicle driver training programme which covers operational safety aspects of operating vehicles and equipment in close proximity to aircraft on the movement area, such as; runways, taxiways, aprons, stands, and relevant adjacent areas to the movement area.""

response	Accepted Text revised to address the proposal.
comment	453 comment by: <i>Estonian CAA</i> Please delete the word "plant" from AMC-OPS.B.025 (a)(2) on page 156.
response	Accepted Text revised to address the proposal.
comment	508 comment by: <i>Icelandic Civil Aviation Administration</i> We suggest to delete the word "health" in AMC-OPS.B.025 (a)(1) on page 156 as this is not aviation safety. Therefore take out "...and the health and safety .." in the beginning of line 2. What is meant by "plant" in line 2? We suggest to delete the word "plant" and keep only "...vehicles and equipment...". We suggest to rewrite the end of this paragraph as the movement area includes manoeuvring area and aprons and stands. Considering these comments; here is a suggestion for the rewording of subparagraph (1): "A generic airside vehicle driver training programme which covers operational safety aspects of operating vehicles and equipment in close proximity to aircraft on the movement area, such as; runways, taxiways, aprons, stands, and relevant adjacent areas to the movement area."
response	Accepted Text revised to address the proposal.
comment	509 comment by: <i>Icelandic Civil Aviation Administration</i> Please delete the word "plant" from AMC-OPS.B.025 (a)(2) on page 156.
response	Accepted Text revised to address the proposal.
comment	849 comment by: <i>Finnish Transport Safety Agency</i> Suggest to delete the word "health" in AMC-OPS.B.025 (a)(1) on page 156 as this is not aviation safety. Therefore take out "...and the health and safety .." in the beginning of line 2. What is meant by "plant" in line 2? We suggest to delete the word "plant" and keep only "...vehicles and equipment...". We suggest to rewrite the end of this para as the movement area includes manoeuvring area and aprons and stands. Considering these comments; here is a suggestion for the rewording of subparagraph (1): "A generic airside vehicle driver training programme which covers operational safety aspects of operating vehicles and equipment in close proximity to aircraft on the movement area, such as; runways, taxiways, aprons, stands, and relevant adjacent areas to the movement area."

response Accepted
Text revised to address the proposal.

comment 925 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX III — Part-OPS — ADR-OPS.B.025 — Operation of vehicles (p66)
- AMC/GM to ANNEX III — Part-OPS — AMC-ADR-OPS.B.025 - Operation of vehicles (p156)

2. Justification and proposed text / comment

This comment is linked with comment 1205 in book I.

In France, it is a State's responsibility to deliver movement area driving authorizations (all tasks dealing with "policy" can not, in our system and from a legal point of view, by someone else than the State). The current wording specifically assigns this responsibility to the aerodrome operator which would be in contradiction with the French system and legal provisions. It is essential to provide flexibility for this item. Thus, DGAC proposes to indicate that this is done "Without prejudice to the system and legal provisions of the relevant Member State".

ADR-OPS.B.025 — Operation of vehicles

"The aerodrome operator shall establish procedures for the formal training, assessment and authorisation of all drivers operating on the movement area, without prejudice to the system and legal provisions of the relevant Member State."

AMC-OPS.B.025 — Operation of vehicles

"[...]"

(b) An aerodrome operator should establish a system for issuing movement area driving authorisations and the conditions of their renewal, without prejudice to the system and legal provisions of the relevant Member State."

response Noted
Annex Va of the BR assigns the responsibility to the aerodrome operator to ensure the proper training of personnel who are allowed unescorted access to the movement area. We consider also that movement area driving authorisations are the verification by the aerodrome operator that the holder of this authorisation is qualified to drive on the movement area.

comment 1272 comment by: Zürich Airport

Add in paragraph (2) "vehicles, which were operated by the aerodrome". Specific training on specific vehicles (e.g. highloader) which were operated by third parties (handling agents) were carried out by themselves.

response Not accepted
Paragraph (a) establishes the framework for airside driving. The aerodrome operator is not the only one allowed to deliver this training. Other parties, such as ground handlers, airlines, etc. are allowed to deliver

training as well.

comment

1376

comment by: UK CAA

Page No: 156

Paragraph No: AMC-OPS.B.025

Comment: The UK has significant concerns regarding airside driving and believes this AMC should relate to Appendix 7 of EAPPRI 2.

Justification: Whilst this AMC outlines the requirements of airside driver training scheme the UK believes it should directly relate to EAPPRI 2.

Proposed Text:

New (c):

"The aerodrome operator should ensure that a formal driver training and assessment programme is in place and follows the framework in Appendix C of EAPPRI 2."

response

Partially accepted

GM1-ADR.OPS.B.025, which actually comes from Attachment A, 18 of Annex 14 is upgraded to AMC. The provisions of EAPPRI 2 and ICAO Doc.9870 will be included as a new GM2 - ADR.OPS.B.025.

comment

1481

comment by: Swedish Transport Agency

Suggest to delete the word "health" in AMC-OPS.B.025 (a)(1) on page 156 as this is not aviation safety. Therefore take out "...and the health and safety .." in the beginning of line 2. What is meant by "plant" in line 2? We suggest to delete the word "plant" and keep only "...vehicles and equipment...". We suggest to rewrite the end of this para as the movement area includes manoeuvring area and aprons and stands. Considering these comments; here is a suggestion for the rewording of subparagraph (1): "A generic airside vehicle driver training programme which covers operational safety aspects of operating vehicles and equipment in close proximity to aircraft on the movement area, such as; runways, taxiways, aprons, stands, and relevant adjacent areas to the movement area."

response

Accepted

Text revised to address the proposal.

comment

1483

comment by: Swedish Transport Agency

Please delete the word "plant" from AMC-OPS.B.025 (a)(2) on page 156.

response

Accepted

Text revised to address the proposal.

comment

2023

comment by: Airport St. Gallen-Altenrhein - ACH/LSZR

Add in paragraph (2) "vehicles, which are operated by the aerodrome".

	<p>Specific training on vehicles which are operated by third parties (e.g. handling agents) were carried out by themselves.</p>
<p>response</p>	<p>Not accepted</p> <p>Paragraph (a) establishes the framework for airside driving. The aerodrome operator is not the only one allowed to deliver this training. Other parties, such as ground handlers, airlines, etc. are allowed to deliver training as well.</p>
<p>comment</p>	<p>2149 comment by: <i>Danish Transport Authority</i></p> <p>Suggest to delete the word "health" in AMC-OPS.B.025 (a)(1) on page 156 as this is not aviation safety. Therefore take out "...and the health and safety .." in the beginning of line 2. What is the meaning by the term "plant" in line 2 (its from ICAO but still not clear)? We suggest to delete the word "plant" and keep only "...vehicles and equipment...". We suggest to rewrite the end of this para as the movement area includes manoeuvring area and aprons/stands. Considering these comments; here is a suggestion for the rewording of subparagraph (1): "A generic airside vehicle driver training programme which covers operational safety aspects of operating vehicles and equipment in close proximity to aircraft on the movement area;"</p>
<p>response</p>	<p>Accepted</p> <p>Text revised.</p>
<p>comment</p>	<p>2150 comment by: <i>Danish Transport Authority</i></p> <p>It should be possible to make arrangements for specific driving areas to GA facilities that does not involve the movement area on relatively small and simple aerodromes without establishment of specific authorisations. (a) (1) have the objective of professional drivers and not the drivers for the general aviation segment. It will be a large economical burden for the aerodromes with no impact on the safety. We suggest to add a definition for a "Service area" within the aerodrome: "Service area is a defined area outside the movement area, solely intended for parking and maintenance of A/C, and where boarding/debarking of commercial passengers is not allowed".</p> <p>Justification: On aerodromes with high intensity of GA traffic, with much maintenance activity, and where the layout necessitates that "civililian" cars etc. share some paved areas (like roads to/between hangars) with A/C, it is highly impractical and costly to require "Airside area driving" training, and marking of cars (beacons) to all persons/vehicles with a need to move in said area.</p>
<p>response</p>	<p>Noted</p> <p>The definition of aprons, movements area, and manoeuvring area are well established in the BR and ICAO Annex 14. The Agency doesn't intend to introduce definitions different from those already existing. The Agency considers very important the uniform application of the rules at all parts of the movement area and other operational areas.</p>

comment	2477	comment by: <i>Isavia</i>
	<p>We suggest to delete the word "health" in AMC-OPS.B.025 (a)(1) on page 156 as this is not aviation safety. Therefore take out "...and the health and safety ..." in the beginning of line 2. What is meant by "plant", in line 2? We suggest to delete the word "plant" and keep only "...vehicles and equipment...". We suggest rewriting the end of this paragraph as the movement area includes maneuvering area and aprons and stands. Considering these comments; here is a suggestion for the rewording of subparagraph (1): "A generic airside vehicle driver training programme which covers operational safety aspects of operating vehicles and equipment in close proximity to aircraft on the movement area, such as; runways, taxiways, aprons, stands, and relevant adjacent areas to the movement area."</p>	
response	<p>Accepted</p> <p>Text revised to address the proposal.</p>	

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM1-ADR-OPS.B.025 – Movement Area Driving Training</p>	<p>p. 156</p>
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comment	242	comment by: <i>BAA</i>
	<p>Due to imminent changes to legislation in th UK covering this matter, this guidance should be upgraded from its current status of GM.</p>	
response	<p>Accepted</p> <p>GM has been upgraded to AMC2 - ADR.OPS.B.025.</p>	

comment	286	comment by: <i>Manchester Airport plc</i>
	<p>(8) Consider upgrading to AMC and include more detail.</p>	
response	<p>Accepted</p> <p>GM has been upgraded to AMC2 - ADR.OPS.B.025.</p>	

comment	511	comment by: <i>Icelandic Civil Aviation Administration</i>
	<p>GM1-ADR-OPS.B.025 – Movement Area Driving Training Suggest to elevate to AMC as very high safety critical issue.</p>	
response	<p>Accepted</p> <p>GM has been upgraded to AMC2 - ADR.OPS.B.025.</p>	

comment	820	comment by: <i>Dublin Airport Authority</i>
	<p>Consider upgrading to an Acceptable Means of Compliance.</p>	
response	<p>Accepted</p>	

GM has been upgraded to AMC2 - ADR.OPS.B.025.

comment	850	comment by: <i>Finnish Transport Safety Agency</i>		
	Movement	Area	Driving	Training
response	Suggest to elevate to AMC as very high safety critical issue.			
	Accepted			
	GM has been upgraded to AMC2 - ADR.OPS.B.025.			

comment	993 ❖	comment by: <i>DGAC Direction Générale de l'aviation civile</i>		
	<u>1. Affected paragraphs</u>			
	<ul style="list-style-type: none">• Draft Commission Regulation - Article 2 - Definitions (p6-10)• AMC/GM to ANNEX III — Part-OPS — GM4-ADR-OPS.B.010 — Training of Rescue and Fire Fighting Personnel (p149-150)• AMC/GM to ANNEX III — Part-OPS — GM1-ADR-OPS.B.025 — Movement Area Driving Training (p156)• AMC/GM to ANNEX III — Part-OPS — AMC-ADR-OPS.B.045 - Low visibility operations (p159-160)			
	<u>2. Justification and proposed text / comment</u>			
	This comment is linked with comment 1232 in book I.			
	This comment is critical , as the drafted rules are confusing on this subject.			
	When low visibility conditions occur, low visibility operations are activated. According to PANS-ATM (ICAO Doc 4444 – paragraph 7.12.3): “Low visibility operations shall be initiated by or through the aerodrome control tower.”			
	Concerning low visibility, Annex 14 Volume 1 only deals with procedures to be implemented by the aerodrome operator during low visibility conditions.			
	As a conclusion: ATM is in charge of initiating low visibility operations. Once these low visibility operations initiated, the aerodrome operator has to implement adequate procedures.			
	Consequently, the definition given in the cover regulation (p8) for “low visibility procedures” is not needed and even brings confusion between the aerodrome operator’s procedures and the air navigation service provider’s procedures. This definition is not an ICAO Annex 14 volume 1 (which does not use “Standard category I to III”) and is an ATM definition: aerodrome operators are dealing with “procedures in low visibility conditions” or “procedures during low visibility operations”. Their goal is to permit the implementation of LVP on the aerodrome in low visibility conditions that are when the RVR is less than 550 meters or when asked by the ANSP.			
	The wording of the implementing rule ADR-OPS.B.045 (“procedures for aerodrome operations in low visibility conditions”) reflects correctly this duality and should be taken for the AMC. The definition of LVP should be deleted from the Cover Regulation to avoid confusion.			
	Therefore DGAC proposes:			
	Article 2 of the cover regulation:			
	“Low visibility procedures” means procedures applied at an aerodrome for the purpose of ensuring safe operations during lower than Standard			

~~Category I, other than Standard Category II, Category II and III conditions.~~

~~'Lower than Standard Category I operation' means a Category I instrument approach and landing operation using Category I Decision Height, with an RVR lower than would normally be associated with the applicable Decision Height but not lower than 400 m.~~

~~[...]~~

~~'Other than Standard Category II operation' means a precision instrument approach and landing operation using ILS or MLS where some or all of the elements of the precision approach Category II light system are not available, and with:~~

~~– Decision Height (DH) below 200 ft but not lower than 100 ft; and~~

~~– Runway Visual Range (RVR) of not less than 350 m."~~

GM4-ADR-OPS.B.010 – Training of Rescue and Fire Fighting Personnel

"(a) The training of rescue and fire-fighting personnel may include initial and recurrent training in at least the following areas:

[...]

(13) low visibility operations procedures;

[...]"

GM1-ADR-OPS.B.025 – Movement Area Driving Training

"(a) The training for driving on the movement area may include the following:

[...]

(7) low visibility operations procedures; and

[...]"

AMC-ADR-OPS.B.045 – Low visibility operations

"(a) The aerodrome operator should, in collaboration with ANSPs and major aircraft operators at the aerodrome establish low visibility means and procedures for aerodrome operations in low visibility conditions (LVP) if movement of aircraft is permitted when the RVR is less than 550 meters;

(b) Low visibility The procedures for aerodrome operations in low visibility conditions (LVP) should be approved by the competent authority before implementation;

(c) When the procedures for aerodrome operations in low visibility conditions (LVP) are in effect, the aerodrome operator should make available to AIS and/or ATS, as appropriate, information on the status of the aerodrome facilities;

(d) The aerodrome operator should establish and implement procedures for aerodrome operations in low visibility conditions to ensure that, when low visibility procedures (LVP) they are in effect, persons and vehicles operating on an apron are restricted to the essential minimum;

(e) The procedures to be established by the aerodrome operator to ensure safe aerodrome operations during low visibility conditions should cover the following subjects:

(1) physical characteristics of the runway environment, including approach and departure areas;

(2) obstacle limitation surfaces;

(3) visual aids compliant to AMC-ADR-OPS.B.040 (night operations);

(4) non-visual aids;

(5) secondary power supplies;

(6) movement area safety;

	<p>(7) RFFS.”</p>
response	<p>Noted</p> <p>The comment on GM1-ADR.OPS.B.025 is noted. However, the Agency prefers to keep the term ‘Low Visibility Procedures’ to ensure harmonisation with ATM and flight operations.</p>
comment	<p>1043 comment by: <i>Finavia</i></p> <p>(a)(5) to be formulated as follows “Hold a State Radiotelephony Operating License or have a special training if its duties involve driving on the manoeuvring area”</p> <p>In Finland persons driving on the manoeuvring area do not operate on frequencies with aircraft. However for all persons driving on the manoeuvring area basic RTF procedures and knowledge of approved RTF language is required in order to have the driving permit.</p> <p>(a)(6) : word “classroom” to be removed because part of the training will take place nowadays on intranet. Also exams can be taken on intranet/extranet too.</p> <p>(b) it must be up to the airport operator to decide how many years driving permit may be valid for; two years at many airports generates a lot unnecessary bureaucracy.</p>
response	<p>Partially accepted</p> <p>Comment on (a) (5) is agreed and text revised accordingly. Comment on (a) (6) is agreed and text revised accordingly. Comment on (b) is partially agreed and text revised accordingly in order to provide some flexibility.</p>
comment	<p>1273 comment by: <i>Zürich Airport</i></p> <p>Relating to GM2: Paragraph (a)(5) ist out of scope and represents an overkill. Please delete it.</p>
response	<p>Noted</p> <p>The Agency considers appropriate that persons driving on the manoeuvring area should either hold a State Radiotelephony Operating License or receive a special training.</p>
comment	<p>1274 comment by: <i>Zürich Airport</i></p> <p>Relating to GM2, para (b): Please make difference between the validations (apron and service roads drivers permit vs. permit for driving on the manoeuvring area). Apron and service roads permit should be valid for 5 years.</p>
response	<p>Noted</p> <p>Additional guidance is provided.</p>

comment	<p>1397 comment by: UK CAA</p> <p>Page No: 156</p> <p>Paragraph No: GM1-ADR-OPS.B.025</p> <p>Comment: The UK has significant concerns regarding airside driving and believes this GM should be upgraded to an AMC and aligned to Appendix 7 of EAPPRI2.</p> <p>Justification: EAPPRI 2 in recommendation 1.2.5 says "Introduce a formal Driver training and assessment programme, or where already in place review against driver training guidelines." The UK believes this recommendation justifies directly relating to the framework in Appendix 7 of EAPPRI 2.</p> <p>Proposed Text: Add: "The aerodrome operator should ensure that the training for driving on the movement area takes account of the Driver Training Programme material in Appendix C of EAPPRI 2."</p>
response	<p>Accepted</p> <p>The Agency drafted a new GM2 - ADR.OPS.B.025 including the requirements of ICAO Doc.9870 and EAPPRI 2.</p>
comment	<p>1724 comment by: London Luton Airport Operations Ltd</p> <p>GM1-ADR.OPS.B.025 - Movement Area Driver Training (a)(8) - RFFS driving (8) specialist functions as required, for example, in rescue and fire-fighting. Consider upgrading to AMC and include more detail.</p>
response	<p>Accepted</p> <p>GM has been upgraded to AMC2 - ADR.OPS.B.025.</p>
comment	<p>2046 comment by: Shannon Airport</p> <p>Consider upgrading to an Acceptable Means of Compliance</p>
response	<p>Accepted</p> <p>GM has been upgraded to AMC2 - ADR.OPS.B.025.</p>
comment	<p>2121 comment by: HIA - Highlands and Islands Airports Limited</p> <p>GM1-ADR-OPS.B025 (8) - specialist functions consider upgrading to AMC and include more details</p>
response	<p>Accepted</p> <p>GM has been upgraded to AMC2 - ADR.OPS.B.025.</p>

comment	2417	comment by: <i>East Midlands Airport - EMA/EGNX</i>
	(8) Consider upgrading to AMC and include more detail.	
response	Accepted GM has been upgraded to AMC2 - ADR.OPS.B.025.	
comment	2478	comment by: <i>Isavia</i>
	<p>Movement Area Driving Training Suggest elevating to AMC as very high safety critical issue.</p>	
response	Accepted GM has been upgraded to AMC2 - ADR.OPS.B.025.	
comment	2493	comment by: <i>DAA Cork Airport</i>
	Consider upgrading to an Acceptable Means of Compliance.	
response	Accepted GM has been upgraded to AMC2 - ADR.OPS.B.025.	
comment	2597	comment by: <i>EAL AFS - Edinburgh Airport</i>
	<p>GM1-ADR.OPS.B.025 – Movement Area Driver Training</p> <p>(a)(8) – RFFS driving (8) specialist functions as required, for example, in rescue and fire-fighting.</p> <p>Consider upgrading to AMC and include more detail.</p>	
response	Accepted GM has been upgraded to AMC2 - ADR.OPS.B.025.	
comment	2612	comment by: <i>Stansted Airport - Daren BARTHAM</i>
	<p>GM1-ADR.OPS.B.025 – Movement Area Driver Training (a)(8) – RFFS driving (8) specialist functions as required, for example, in rescue and fire-fighting. Consider upgrading to AMC and include more detail.</p>	
response	Accepted GM has been upgraded to AMC2 - ADR.OPS.B.025.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM2-ADR-OPS.B.025 – Grant, suspension or revocation of an airside driving permit p. 156-157

comment	268	comment by: <i>CAA Norway</i>
	GM2-ADR-OPS.B.025 (a)(5) on page 157: State Radiotelephny Operating Licence would be too strict for many aerodromes. Internal training should in many cases be sufficient. Please reword to facilitate proportionality.	
response	Accepted	
	Point (a) (5) has been revised to give some flexibility.	
comment	269	comment by: <i>CAA Norway</i>
	Renewal every 2 years is too strict, and also not suitable for a GM the way it is written. Suggest to change to " periodically ": " <i>The airside driving permit may be renewed periodically, provided that...</i> "	
response	Accepted	
	Point (b) has been revised to give some flexibility.	
comment	315	comment by: <i>CAA Austria - Ministry of Transport</i>
	(5) (5) Change text to: Hold a Radiotelephony Operting Licence, which cope with their duties by driving on the maneuvering area and which is accepted by the Competent Authority	
response	Partially accepted	
	The Agency introduced also the possibility of having a special training on RTF procedures.	
comment	454	comment by: <i>Estonian CAA</i>
	"We suggest rewording of GM2-ADR-OPS.B.025 on page 157. Renewal of an airside driving permit every 2 years is too strict. We suggest to change this to ""periodically"". ""The airside driving permit may berenewed periodically, provided that...""	
response	Accepted	
	Point (b) has been revised to give some flexibility.	
comment	512	comment by: <i>Icelandic Civil Aviation Administration</i>
	GM2-ADR-OPS.B.025 — Grant, suspension or revocation of an airside driving permit (c) (3) - Suggest to write "...has been proven to ..." instead of "reported". It should not be enoght that someone is reported only without it being proven that the person was under the influence.	
response	Accepted	
	Text revised accordingly.	
comment	513	comment by: <i>Icelandic Civil Aviation Administration</i>

We suggest rewording of GM2-ADR-OPS.B.025 on page 157. Renewal of an airside driving permit every 2 years is too strict. We suggest to change this to "periodically".
"The airside driving permit may be renewed periodically, provided that..."

response Accepted
Point (b) has been revised to give some flexibility.

comment 572 comment by: *Vienna International Airport*
(a)(3) remove "State"
(a)(5) change to:
Hold a Radiotelephony Operating Licence, which cope with their duties by driving on the maneuvering area and which is accepted by the Competent Authority.
(b) change to:
... be valid for a maximum of 5 years

response Noted
The Agency introduced also the possibility of having a special training on RTF procedures.
Point (b) has also been revised to provide some flexibility.

comment 598 comment by: *Brussels Airport - BRU/EBBR*
GM2-ADR-OPS.B.025(a)(5)
State Radiotelephony Operating License
Does this mean that an English Language Proficiency test according to ICAO resolution A36/11, is a requirement as well ? If so, I suggest to add this in the GM text to prevent any ambiguity or doubt on this point. If it is not a requirement, I would like to see this explicitly mentioned as not being required. But in this last case, this may be contradictory to the rules that apply to the state radiotelephony operating license.

response Noted
The Agency believes that the requirements for issuing a State Radiotelephony Operating License should apply and there isn't any reason to include the English Language Proficiency if this is already required by the State. However, this is a GM and proposes also the attendance to a special training on RTF procedures instead.

comment 851 comment by: *Finnish Transport Safety Agency*
We suggest rewording of GM2-ADR-OPS.B.025 on page 157. Renewal of an airside driving permit every 2 years is too strict. We suggest to change this to "periodically".
"The airside driving permit may be renewed periodically, provided that..."

response Accepted
Point (b) has been revised to give some flexibility.

comment 1018 comment by: *Finnish Transport Safety Agency*
GM2-ADR-OPS.B.025 (a)(5) on page 157: State Radiotelephony Operating Licence would be too strict for many aerodromes. Internal training should in many cases be sufficient. Please reword to facilitate proportionality.

response Accepted
Point (a) (5) has been revised to give some flexibility.

comment 1188 comment by: *Salzburger Flughafen GmbH*
(a)(3) remove "State"

(a)(5) change to:
Hold a Radiotelephony Operating Licence, which cope with their duties by driving on the manoeuvring area and which is accepted by the competent Authority.

(b) change to:
...be valid for a maximum of 5 years

response *Noted*
The Agency introduced also the possibility of having a special training on RTF procedures.
Point (b) has also been revised to provide some flexibility.

comment 1486 comment by: *Swedish Transport Agency*
We suggest rewording of GM2-ADR-OPS.B.025 on page 157. Renewal of an airside driving permit every 2 years is too strict. We suggest to change this to "periodically". "The airside driving permit may be renewed periodically, provided that..."

response Accepted
Point (b) has been revised to give some flexibility.

comment 1494 comment by: *Flughafen Graz Betriebs GmbH*
(a)(3) remove "State"

(a)(5) change to:
Hold a Radiotelephony Operating Licence, which cope with their duties by driving on the maneuvering area and which is accepted by the Competent Authority.

(b) change to:
... be valid for a maximum of 5 years

response Noted
The Agency introduced also the possibility of having a special training on RTF procedures.
Point (b) has also been revised to provide some flexibility.

comment 1546 comment by: *Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH*
(a)(3) remove "State"
(a)(5) change to:
Hold a Radiotelephony Operating Licence, which cope with their duties by driving on the maneuvering area and which is accepted by the Competent Authority.
(b) change to:
... be valid for a maximum of 5 years

response Noted
The Agency introduced also the possibility of having a special training on RTF procedures.
Point (b) has also been revised to provide some flexibility.

comment 1650 comment by: *Flughafen Linz-Hörsching - LNZ/LOWL*
(a)(3) remove "State"
(a)(5) change to:
Hold a Radiotelephony Operating Licence, which cope with their duties by driving on the maneuvering area and which is accepted by the Competent Authority.
(b) change to:
... be valid for a maximum of 5 years

response Noted
The Agency introduced also the possibility of having a special training on RTF procedures.
Point (b) has also been revised to provide some flexibility.

comment 2151 comment by: *Danish Transport Authority*
This paragraph should stay as GM. Parts of the suggested requirements are time consuming and uncertain impact on safety. Use of State Radiotelephny Operating Licence should only be the result from a risk assessment that shows the highly specific need. Internal training should in most cases be sufficient. The issue of a valid driver license is a police issue

response	<p>under the Member State traffic regulation.</p> <p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2152 comment by: <i>Danish Transport Authority</i></p> <p>(c) (3): Suggest to write "...has been proven to ..." instead of "reported". It should not be enough that someone is reported only without it being proven that the person was under the influence.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2164 comment by: <i>Vereinigung der Dienstleister an Deutschen Flughäfen e.V. (VDF)</i></p> <p>According to (b) an airside driving permit may be valid for 2 years. There is no doubt about the importance of an airside driving permit but in view of the number of employees who need an airside driving license is 2 years is a too short period as it will create an effort and costs which are not in a relation to the benefit. 5 years are the time period which will do.</p>
response	<p>Accepted</p> <p>Point (b) has been revised to give some flexibility.</p>
comment	<p>2176 comment by: <i>Billund Airport - BLL/EKBI</i></p> <p><i>Page 157 - GM2-ADR-OPS.B.025 — Grant, suspension or revocation of an airPage driving permit, (A) (5):</i> "...(5) Hold a State Radiotelephony Operating License if its duties involve driving on the manoeuvring area;..."</p> <p>Persons who shall drive in the maneuvering area must have a State Radiotelephony Operating License, and this is therefore a significant unnecessary tightening of the requirements. A training course including appropriate phraseology for driving in the maneuvering area is sufficient.</p>
response	<p>Noted</p> <p>Text revised accordingly to include also a special training on RTF procedures.</p>
comment	<p>2201 comment by: <i>Flughafen Klagenfurt</i></p> <p>(a)(3) remove "State"</p> <p>(a)(5) change to: Hold a Radiotelephony Operation Licence, which cope with their duties by driving on the maneuvering area and which is accepted by the Competent Authority.</p> <p>(b) change to:</p>

	... be valid for a maximum of 5 years
response	Noted The Agency introduced also the possibility of having a special training on RTF procedures. Point (b) has also been revised to provide some flexibility.
comment	2479 comment by: <i>Isavia</i> We suggest rewording of GM2-ADR-OPS.B.025 on page 157. Renewal of an airside driving permit every 2 years is too strict. We suggest changing this to "periodically". "The airside driving permit may be renewed periodically, provided that..."
response	Accepted Text revised accordingly to provide some flexibility.

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC-ADR-OPS.B.030 – Surface Movement Guidance and Control System</p>	p. 157-158
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comment	582 comment by: <i>BAF - Federal Supervisory Authority for Air Navigation Services</i> Es sollte geprüft werden, ob die Anforderungen an die Kooperation Flughäfen/ANSP hinsichtlich Einführung von Bodendarstellung aufgenommen werden sollte (analog zu AMC.ADR-OPS.B.045). Begründung: Die Bodendarstellung ist nur sinnvoll, wenn die geforderten Kriterien nicht automatisch für alle Plätze gefordert werden.
response	Noted The cooperation with the Air Traffic Services Provider is included in (e).
comment	601 comment by: <i>Flughafen Duesseldorf GmbH</i> (d) Move to the GM!
response	Not accepted The cooperation between the aerodrome operator and the Air Traffic Services Provider is essential when developing an SMGCS.
comment	964 comment by: <i>Cologne/Bonn Airport</i> (d): move to GM
response	Not accepted The cooperation between the aerodrome operator and the Air Traffic Services Provider is essential when developing an SMGCS.

comment	1206	comment by: <i>Federal Office of Civil Aviation FOCA</i>
	Please write "SMGCS" with an "S" (incomplete abbreviation).	
response	Noted	
	The last 'S' is omitted when the word 'System' is used.	
comment	1255	comment by: <i>Airport Nuremberg - NUE/EDDN</i>
	Developing a surface movement guidance and control system (SMGCS) with the major aircraft operators at the aerodrome leads to a hindrance in the development and adds far more complexity than an potential advantage. Therefor it should be adequate to involve the Air Traffic Service Provider in the development process. The major aircraft provider can be involved in the context of the Runway Safety Team, but a general being forced of having to negotiate every adaptation or development with the major aircraft operators cannot be realized by the aerodrome operator. -> Cancellation of "and the major aircraft operator at the aerodrome" is essential.	
response	Accepted	
	Text revised accordingly.	
comment	1700	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none">• AMC/GM to ANNEX III — Part-OPS — AMC-ADR-OPS.B.030 - Surface movement guidance and control system (p157-158)	
	<u>2. Justification and proposed text / comment</u>	
	While the ICAO Annex 14 volume 1 wording indicates some specific purposes of an SMGCS, the NPA wording implies an obligation for the aerodrome operator; the compliance to which cannot be proven as some tasks are performed by the ANSP.	
	It is consequently proposed to delete in paragraph (b): "The aerodrome operator should ensure that:" and only maintain the objectives of a surface movement guidance and control system.	
	Consideration should also be given to inclusion of Annex 14 Standard 5.3.19.13 in the same CS-ADR-DSN.M.710 for completeness.	
	It is consequently proposed to modify AMC-ADR-OPS.B.030 as follows:	
	AMC-ADR-OPS.B.030 — Surface Movement Guidance and Control System	
	<i>"(a) The aerodrome operator should develop a surface movement guidance and control system taking into account:</i>	
	<i>(1) the density of air traffic;</i>	
	<i>(2) the visibility conditions under which operations are intended;</i>	
	<i>(3) the need for pilot orientation;</i>	
	<i>(4) the complexity of the aerodrome layout; and</i>	
	<i>(5) movements of vehicles.</i>	
	<i>(b) The aerodrome operator should ensure that:</i>	
	<i>(1) The surface movement guidance and control system is designed to</i>	

assist in the prevention of inadvertent incursions of aircraft and vehicles onto an active runway;
~~(2)(c)~~ The system is designed to assist in the prevention of collisions between aircraft, and between aircraft and vehicles or objects, on any part of the movement area.
~~(c)(d)~~ The aerodrome operator should ensure that wWhere a surface movement guidance and control system is provided by selective switching of stop bars and taxiway centre line lights, the following requirements are met:
(1) taxiway routes which are indicated by illuminated taxiway centre line lights should be capable of being terminated by an illuminated stop bar;
(2) the control circuits shall be so arranged that when a stop bar located ahead of an aircraft is illuminated, the appropriate section of taxiway centre line lights beyond it is suppressed; and
(3) the taxiway centre line lights are activated ahead of an aircraft when the stop bar is suppressed.
[...]"

response

Accepted

Text revised accordingly.

comment

2005

comment by: Munich Airport International

(d)

move to GM

response

Not accepted

The cooperation between the aerodrome operator and the Air Traffic Services Provider is essential when developing an SMGCS.

comment

2073

comment by: AENA - Aeropuertos Españoles y Navegación Aérea

While the ICAO Annex 14 volume 1 wording indicates some specific purposes of an SMGCS, the NPA wording implies an obligation for the aerodrome operator; the compliance to which cannot be proven as some tasks are performed by the ANSP.

It is consequently proposed to delete in paragraph (b): "The aerodrome operator should ensure that:" and only maintain the objectives of a surface movement guidance and control system.

Consideration should also be given to inclusion of Annex 14 Standard 5.3.19.13 in the same CS-ADR-DSN.M.710 for completeness.

It is consequently proposed to modify AMC-ADR-OPS.B.030 as follows:

AMC-ADR-OPS.B.030 – Surface Movement Guidance and Control System

"(a) The aerodrome operator should develop a surface movement guidance and control system taking into account:

(1) the density of air traffic;

(2) the visibility conditions under which operations are intended;

(3) the need for pilot orientation;

(4) the complexity of the aerodrome layout; and
 (5) movements of vehicles.
~~(b) The aerodrome operator should ensure that:~~
~~(1) The surface movement guidance and control system is designed to assist in the prevention of inadvertent incursions of aircraft and vehicles onto an active runway;~~
~~(2)(c) The system is designed to assist in the prevention of collisions between aircraft, and between aircraft and vehicles or objects, on any part of the movement area.~~
~~(c)(d) The aerodrome operator should ensure that wWhere a surface movement guidance and control system is provided by selective switching of stop bars and taxiway centre line lights, the following requirements are met:~~
 (1) taxiway routes which are indicated by illuminated taxiway centre line lights should be capable of being terminated by an illuminated stop bar;
 (2) the control circuits shall be so arranged that when a stop bar located ahead of an aircraft is illuminated, the appropriate section of taxiway centre line lights beyond it is suppressed; and
 (3) the taxiway centre line lights are activated ahead of an aircraft when the stop bar is suppressed.
 [...]”

response

Accepted
 Text revised accordingly

comment

2572 comment by: *ADV -German Airports Association*
 AMC.ADR.OPS.B.030 (d)
 Move to GM

response

Not accepted
 The cooperation between the aerodrome operator and the Air Traffic Services Provider is essential when developing an SMGCS.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM-ADR-OPS.B.030 – Surface Movement Guidance and Control System p. 158

comment

310 comment by: *Danish Transport Authority*
 The guidance material (GM) of a surface movement radar should be upheld to an AMC. The subject is a recommendation, Annex 14. It should be a CS, so it can be a requirement on an aerodrome if the assessment shows that SMR is necessary.

response

Noted
 SMR is recommended under specific RVR conditions and traffic density. The Agency decided to put the information on the SMR under GM in order to support the aerodrome operator in its decision to provide or not an SMR. Specifications for an SMR are likely to be addressed in rulemaking

task on aerodrome equipment in the future

comment

2074

comment by: *AENA - Aeropuertos Españoles y Navegación Aérea*

(a) The SMGC system comprises an appropriate combination of visual aids, non-visual aids, procedures, control, regulation, management and information facilities;

(b) The surface movement guidance and control system is designed to assist in the prevention of inadvertent incursions of aircraft and vehicles onto an active runway;

(c) The system is designed to assist in the prevention of collisions between aircraft, and between aircraft and vehicles or objects, on any part of the movement area.

(d) Surface movement radar for the manoeuvring area may be provided at an aerodrome intended for use in runway visual range conditions less than a value of 350 m;

(e) Surface movement radar for the manoeuvring area may be provided at an aerodrome other than that in (b) above when traffic density and operating conditions are such that regularity of traffic flow cannot be maintained by alternative procedures and facilities.

response

Noted

The Agency decided to keep the proposed (b) and (c) into the AMC to highlight the need for preventing runway incursions and collisions.

comment

2154

comment by: *Danish Transport Authority*

Query: The paragraph (b) regarding the use of surface movement radar should be part of the CSs in B.III. It should be part of the certification basis if the assessments shows the need of SMR according to the conditions specified under AMC-ADR-OPS.B.030.

response

Noted

Paragraphs (b) and (c) provide guidance on the criteria that could be used to decide whether an SMR should be utilized or not. The Agency is likely to propose CSs for the SMR on aerodrome equipment rulemaking task in the future.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – AMC-ADR-OPS.B.035 – Operations in
winter conditions**

p. 158

comment

36

comment by: *ACI EUROPE - Airports Council International*

(c) delete

Justification: Environmental protection in skid prevention is currently based on using formiates and acetates as de-icing chemicals instead of

urea on runways and taxiways in Northern Europe. These chemicals are the most environmentally friendly on the market. If the point c) above enters into force, and if it would be interpreted as prohibition of formiates and acetates, it could effectively close/affect many airports in Northern Europe during the winter season.

- The wording in the proposed amendment is not very precise as to what the definition of "harmful effects on aircraft and pavements" would include and who should decide it. It is, however, well known that some airlines and airframe manufactures are campaigning against the use of these environmentally friendly chemicals because of alleged corrosion.
- The reason for using runway deicers is to improve the performance of the runways and taxiways with the intention to help the airlines giving their customers best/safest service. All known runway deicers do have impact either on runways, aircraft or environment.
- There has been a long discussion going on in the SAE G122 regarding the test methods for runway deicers and how these products affects aircraft. This work is still ongoing, but it seems to take a while before acceptable test methods are available.
- Based on the discussion in the SAE G12, nobody has, as far as we are aware, documented any safety issue related to formiates and acetates. There is, however, a cost and maintenance issue. The extra maintenance cost for airport equipment is considered acceptable compared with the environmental benefits the environmental friendly deicers (formiates and acetates) have.
- Several measures have been carried out to protect the aircrafts and the carbon brakes over the last years, and the industry is also working hard to improve the runway and aircraft deicers.
- The proposed wording in the new EASA regulation could end up with a situation where formiates or acetates may be prohibited. This could lead to a conflict between EU Air safety legislation and Environment legislation. E.g the EU Water Directive describes storm water runoff from airports as a main source to organic load to water recipients.
- Based on today's technology the airports probably would have to reduce the consumption of runway deicers with approximately 90 % if formiates and acetates could no longer be used – this could also seriously affect safety, efficiency and punctuality of air traffic, since it could result in resilience in using enough runway deicers.

There is to our knowledge no evidence that deicing chemicals have a negative safety impact, but it is well documented that the negative effect on the environment is severe. A prohibition of formiates and acetates will in practice effectively close many airports in Northern Europe during the winter season.

response Partially accepted

It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment 141

comment by: CAA-NL

response	<p>We suggest to delete subpart (c) of this AMC. These chemicals are not yet available.</p> <p>Partially accepted</p> <p>It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.</p>
comment	<p>173 comment by: <i>Swedavia AB - Swedish airports (currently 11 airports)</i></p> <p>(c) Delete, this type of chemical is currently not available.</p>
response	<p>Partially accepted</p> <p>It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.</p>
comment	<p>190 comment by: <i>SWISS AERODROMES ASSOCIATION</i></p> <p>letter c) should be reworded as there are no chemicals available without harmful effect on aircraft or on pavements.</p>
response	<p>Partially accepted</p> <p>It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.</p>
comment	<p>270 comment by: <i>CAA Norway</i></p> <p>We suggest to insert: "...., pavements or equipment." in AMC-ADR-OPS.B.035 (c) on page 158.</p>
response	<p>Not accepted</p> <p>The text is in line with ICAO Annex 14 10.2.13 Standard,</p>
comment	<p>365 comment by: <i>Avinor</i></p> <p>AMC.ADR.OPS.B.035 c). Letter C should be deleted. This type of chemical is currently not available.</p>
response	<p>Partially accepted</p> <p>It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.</p>
comment	<p>455 comment by: <i>Estonian CAA</i></p> <p>"We suggest to insert: ""...., pavements or other equipment."" in AMC-ADR-OPS.B.035 (c) on page 158. "</p>
response	<p>Noted</p>

The text is in line with ICAO Annex 14 10.2.13 Standard.

comment	514	comment by: <i>Icelandic Civil Aviation Administration</i>
	We	suggest to insert:
	"..., pavements or equipment."	in AMC-ADR-OPS.B.035 (c) on page 158.
response	<i>Noted</i>	
	The text is in line with ICAO Annex 14 10.2.13 Standard.	

comment	573	comment by: <i>Vienna International Airport</i>
	(c) Start with "Whenever possible, the Aerodrome"	
	There are currently no chemicals that are non harmful to aircraft or pavement surfaces.	
response	Partially accepted	
	It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.	

comment	658	comment by: <i>Brussels Airport</i>
	AMC-ADR-OPS.B.035(c) to delete because the aerodrome operator can only use the chemicals that are commercially available	
response	Partially accepted	
	It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.	

comment	732	comment by: <i>ADP : Aeroports de Paris</i>
	Référence : AMC-ADR-OPS.B.035	Operations in winter conditions
	Proposition/commentaire	(a) Ce paragraphe s'adresse plutôt à l'autorité compétente qu'à l'exploitant et devrait être dans la partie AR ce qui donnerait : « the aerodrome operator competent authority should prepare in collaboration with the aerodrome operator , ANSP, major aircraft operators... ». (c) Il convient de supprimer le (c).
	Justification	(a) Les critères de suspension des opérations sur les pistes ou d'un aéroport relève en France de l'autorité et non de l'exploitant d'aéroport. Ce dernier peut en faire la proposition. (c) À l'heure actuelle, il n'existe pas de

	produit connu qui n'ait pas d'effets négatifs sur les avions ni sur les chaussées en ayant l'efficacité recherchée.
Traduction de courtoisie	<p>(a) This paragraph is rather aimed to the competent authority than to the aerodrome operator and it should be in the AR part like it follows: « the aerodrome operator competent authority should prepare in collaboration with the aerodrome operator, ANSP, major aircraft operators... ».</p> <p>The criterion for suspension of runway operation or of an aerodrome is the responsibility of the authority in France and not of the aerodrome operator who can nevertheless make the proposal.</p> <p>(c) It is appropriate to delete the (c). Currently, there is no known chemical that does not have any harmful effect on aircrafts or pavements having the intended effect.</p>

response

Noted

The comment on point (a) is not agreed, since this is a responsibility assigned to the aerodrome operator according to Annex Va.B.1.(e) of the BR.

The comment on point (c) is partially agreed. It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment

821

comment by: *Dublin Airport Authority*

Ref (c)

This statement should be deleted as an Acceptable Means of Compliance. Formiates and acetates are currently used as de-icing chemicals on runways and taxiways at European airports affected by significant winter conditions. These chemicals are the most environmentally friendly currently available, if point (c) was to be considered the as an AMC, it is overly onerous on the aerodrome operator and imprecise, as there is no methodology established for determining what constitutes a "harmful effect" and who will determine what chemicals can be construed as such. It is also likely to run counter to existing European legislation in relation to environmental protection and should be left up to the national jurisdiction of each Member State to police and enforce requirements in this area.

response

Partially accepted

It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment	<p>852 comment by: <i>Finnish Transport Safety Agency</i></p> <p>We suggest to insert: "...., pavements or equipment." in AMC-ADR-OPS.B.035 (c) on page 158.</p> <p>Also all chemicals used in winter maintenance are harmful at some level, please clarify harmful.</p>
response	<p>Noted</p> <p>The text is in line with ICAO Annex 14 10.2.13 Standard.</p>

comment	<p>979 comment by: <i>Union des Aéroports français - UAF</i></p> <p>Attachment #191</p> <p>UAF NPA 2011-20 (B.II) AMC-ADR-OPS.B.035</p> <p>Référence : AMC-ADR-OPS.B.035 Operations in winter conditions</p> <p>Traduction de courtoisie</p> <p>(a) This paragraph is rather aimed to the competent authority than to the aerodrome operator and it should be in the AR part like it follows: « the aerodrome operator competent authority should prepare in collaboration with the aerodrome operator, ANSP, major aircraft operators... ».</p> <p>The criterion for suspension of runway operation or of an aerodrome is the responsibility of the authority in France and not of the aerodrome operator who can nevertheless make the proposal.</p> <p>(c) It is appropriate to delete the (c). Currently, there is no known chemical that does not have any harmful effect on aircrafts or pavements having the intended effect.</p>
response	<p>Noted</p> <p>The comment on point (a) is not agreed, since this is a responsibility assigned to the aerodrome operator according to Annex Va.B.1.(e) of the BR.</p> <p>The comment on point (c) is partially agreed. It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.</p>

comment	<p>1044 comment by: <i>Finavia</i></p> <p>Paragraph (c) to be removed. This type of chemical is not available.</p> <ul style="list-style-type: none"> · The wording in the proposed amendment is not very precise as to what the definition of "harmful effects on aircraft and pavements" would include and who should decide it. It is, however, well known that some airlines and airframe manufactures are campaigning against the use of these environmentally friendly chemicals because of alleged corrosion. · The reason for using runway deicers is to improve the performance of the runways and taxiways with the intention to help the airlines giving their customers best/safest service. All known runway deicers do have impact either on runways, aircraft or environment. · There has been a long discussion going on in the SAE G122 regarding the test methods for runway deicers and how these products affects aircraft. This work is still ongoing, but it seems to take a while
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before acceptable test methods are available.

- Based on the discussion in the SAE G12, nobody has, as far as we are aware, documented any safety issue related to formiates and acetates. There is, however, a cost and maintenance issue. The extra maintenance cost for airport equipment is considered acceptable compared with the environmental benefits the environmental friendly deicers (formiates and acetates) have.
- Several measures have been carried out to protect the aircrafts and the carbon brakes over the last years, and the industry is also working hard to improve the runway and aircraft deicers.
- The proposed wording in the new EASA regulation could end up with a situation where formiates or acetates may be prohibited. This could lead to a conflict between EU Air safety legislation and Environment legislation. E.g the EU Water Directive describes storm water runoff from airports as a main source to organic load to water recipients.
- Based on today's technology the airports probably would have to reduce the consumption of runway deicers with approximately 90 % if formiates and acetates could no longer be used – this could also seriously affect safety, efficiency and punctuality of air traffic, since it could result in resilience in using enough runway deicers.

response Partially accepted

It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment 1189 comment by: *Salzburger Flughafen GmbH*

(c) Start with "Whenever possible, the Aerodrome"
 There are currently no chemicals that are non harmful to aircraft or pavement surfaces.

response Accepted

Text revised accordingly.

comment 1257 comment by: *Airport Nuremberg - NUE/EDDN*

Preparing a snow plan with the major aircraft operators and other relevant parties at the aerodrome leads to a hindrance in the development and adds far more complexity than an potential advantage. Therefor it should be adequate to involve the Air Traffic Service Provider in the development process. The major aircraft provider and other relevant parties can be involved in the context of the Bad Weather Committee, but a general being forced of having to negotiate every adaptation or development with the major aircraft operators cannot be realized by the aerodrome operator. -> **Cancellation of "major aircraft operators and other relevant parties" is essential.**

response Partially accepted

Major aircraft operators have been removed, however, the snow plan should be coordinated with other parties, such as local equipment providers, ground handlers, etc.

comment 1260 comment by: *Airport Nuremberg - NUE/EDDN*

	<p>The removal of standing water from the surface of a paved runway can only be ensured through constructional parameters. If standing water is actually on the runway there is no sufficient way to remove it mechanically. Therefore it should be removed from this winter operations paragraph and rather be integrated within the constructional parameters.</p>
response	<p>Noted</p> <p>The Agency agrees that the formation of standing water is a construction issue and runways should be constructed in such a way to avoid the formation of standing water. However, there are cases where standing water is formed. If the situation is assessed and found to be hazardous for aircraft operation, it is expected that the aerodrome operator should take appropriate actions to remove them.</p>
comment	<p>1386 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #192</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC-ADR-OPS.B.035</p> <p>Référence : AMC-ADR-OPS.B.035 Operations in winter conditions</p> <p>Traduction de courtoisie (a) This paragraph is rather aimed to the competent authority than to the aerodrome operator and it should be in the AR part like it follows: « the aerodrome operator competent authority should prepare in collaboration with the aerodrome operator, ANSP, major aircraft operators... ». The criterion for suspension of runway operation or of an aerodrome is the responsibility of the authority in France and not of the aerodrome operator who can nevertheless make the proposal. (c) It is appropriate to delete the (c). Currently, there is no known chemical that does not have any harmful effect on aircrafts or pavements having the intended effect.</p>
response	<p>Noted</p> <p>The comment on point (a) is not agreed, since this is a responsibility assigned to the aerodrome operator according to Annex Va.B.1.(e) of the BR. The comment on point (c) is partially agreed. It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.</p>
comment	<p>1488 comment by: <i>Swedish Transport Agency</i></p> <p>We suggest to insert: "..., pavements or other equipment." in AMC-ADR-OPS.B.035 (c) on page 158.</p>
response	<p>Noted</p> <p>The text is in line with ICAO Annex 14 10.2.13 Standard.</p>
comment	<p>1496 comment by: <i>Flughafen Graz Betriebs GmbH</i></p>

response	<p>(c) Start with "Whenever possible, the Aerodrome"</p> <p>There are currently no chemicals that are non harmful to aircraft or pavement surfaces.</p> <p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>1548 <i>comment by: Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i></p> <p>(c) Start with "Whenever possible, the Aerodrome"</p> <p>There are currently no chemicals that are non harmful to aircraft or pavement surfaces.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>1627 <i>comment by: Geneva International Airport (ROMIG)</i></p> <p>Replace the article with: "Whenever possible, the aerodrome operator should not potentially harmful chemicals so as to limit the harmful effects on aircraft and pavements."</p> <p>There currently are no chemicals that are non harmful to aircraft or pavement surfaces.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>1629 <i>comment by: Assaeroporti - Associazione Italiana Gestori Aeroporti</i></p> <p>(C): the sentence has to be deleted: this type of chemicals is currently not available.</p> <p>Environmental protection in skid prevention is currently based on using formiates and acetates as de-icing chemicals instead of urea on runways and taxiways in Northern Europe. These chemicals are the most environmentally friendly on the market. If the point c) above enters into force, and if it would be interpreted as prohibition of formiates and acetates, it could effectively close/affect many airports in Northern Europe during the winter season.</p> <ul style="list-style-type: none">• The wording in the proposed amendment is not very precise as to what the definition of "harmful effects on aircraft and pavements" would include and who should decide it. It is, however, well known that some airlines and airframe manufactures are campaigning against the use of these environmentally friendly chemicals because of alleged corrosion.• The reason for using runway deicers is to improve the performance of the runways and taxiways with the intention to help the airlines giving their customers best/safest service. All known runway

- deicers do have impact either on runways, aircraft or environment.
- There has been a long discussion going on in the SAE G122 regarding the test methods for runway deicers and how these products affects aircraft. This work is still ongoing, but it seems to take a while before acceptable test methods are available
 - Based on the discussion in the SAE G12, nobody has, as far as we are aware, documented any safety issue related to formiates and acetates. There is, however, a cost and maintenance issue. The extra maintenance cost for airport equipment is considered acceptable compared with the environmental benefits the environmental friendly deicers (formiates and acetates) have.
 - Several measures have been carried out to protect the aircrafts and the carbon brakes over the last years, and the industry is also working hard to improve the runway and aircraft deicers.
 - The proposed wording in the new EASA regulation could end up with a situation where formiates or acetates may be prohibited. This could lead to a conflict between EU Air safety legislation and Environment legislation. E.g the EU Water Directive describes storm water runoff from airports as a main source to organic load to water recipients.
 - Based on today's technology the airports probably would have to reduce the consumption of runway deicers with approximately 90 % if formiates and acetates could no longer be used – this could also seriously affect safety, efficiency and punctuality of air traffic, since it could result in resilience in using enough runway deicers.

There is to our knowledge no evidence that deicing chemicals have a negative safety impact, but it is well documented that the negative effect on the environment is severe. A prohibition of formiates and acetates will in practice effectively close many airports in Northern Europe during the winter season.

response Partially accepted

It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment 1651 comment by: *Flughafen Linz-Hörsching - LNZ/LOWL*

(c) start with "Whenever possible, the aerodrome"

Corrently there are no chemicals that are non harmful to aircraft or pavement surfaces.

response Accepted

Text revised accordingly.

comment 1739 comment by: *Aéroport de Marseille - MRS/LFML*

(a) This paragraph is rather aimed to the competent authority than to the aerodrome operator and it should be in the AR part like it follows: « the ~~aerodrome operator~~ **competent authority** should prepare in collaboration with ~~the aerodrome operator~~, ANSP, major aircraft operators... ».

The criterion for suspension of runway operation or of an aerodrome is the

	<p>responsibility of the authority in France and not of the aerodrome operator who can nevertheless make the proposal.</p> <p>(c) It is appropriate to delete the (c). Currently, there is no known chemical that does not have any harmful effect on aircrafts or pavements having the intended effect.</p>															
response	<p>Noted</p> <p>The comment on point (a) is not agreed, since this is a responsibility assigned to the aerodrome operator according to Annex Va.B.1.(e) of the BR.</p> <p>The comment on point (c) is partially agreed. It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.</p>															
comment	<p>1799 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #193</p> <table border="0"><tr><td>UAF</td><td>NPA</td><td>2011-20</td><td>(B.II)</td><td>AMC-ADR-OPS.B.035</td></tr><tr><td>Référence</td><td></td><td>:</td><td></td><td>AMC-ADR-OPS.B.035</td></tr><tr><td>Operations</td><td>in</td><td>winter</td><td></td><td>conditions</td></tr></table> <p>Traduction de courtoisie</p> <p>(a) This paragraph is rather aimed to the competent authority than to the aerodrome operator and it should be in the AR part like it follows: « the aerodrome operator competent authority should prepare in collaboration with the aerodrome operator, ANSP, major aircraft operators... ».</p> <p>The criterion for suspension of runway operation or of an aerodrome is the responsibility of the authority in France and not of the aerodrome operator who can nevertheless make the proposal.</p> <p>(c) It is appropriate to delete the (c). Currently, there is no known chemical that does not have any harmful effect on aircrafts or pavements having the intended effect.</p>	UAF	NPA	2011-20	(B.II)	AMC-ADR-OPS.B.035	Référence		:		AMC-ADR-OPS.B.035	Operations	in	winter		conditions
UAF	NPA	2011-20	(B.II)	AMC-ADR-OPS.B.035												
Référence		:		AMC-ADR-OPS.B.035												
Operations	in	winter		conditions												
response	<p>Noted</p> <p>The comment on point (a) is not agreed, since this is a responsibility assigned to the aerodrome operator according to Annex Va.B.1.(e) of the BR.</p> <p>The comment on point (c) is partially agreed. It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.</p>															
comment	<p>1808 comment by: <i>AIRBUS</i></p> <p>Please consider any other agents other than chemicals that can have harmful effects:</p> <p>(c) The aerodrome operator should not use chemicals or other agents which may have harmful effects on aircraft or pavements.</p>															
response	<p>Accepted</p>															

Text revised accordingly.

comment

1863 comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*

Attachment [#194](#)

ADBM - NPA 2011-20 (B.II) AMC-ADR-OPS.B.035

Référence : AMC-ADR-OPS.B.035
Operations in winter conditions

Traduction de courtoisie

(a) This paragraph is rather aimed to the competent authority than to the aerodrome operator and it should be in the AR part like it follows: « the ~~aerodrome operator~~ **competent authority** should prepare in collaboration with the aerodrome operator, ANSP, major aircraft operators... ».

The criterion for suspension of runway operation or of an aerodrome is the responsibility of the authority in France and not of the aerodrome operator who can nevertheless make the proposal.

(c) It is appropriate to delete the (c).
Currently, there is no known chemical that does not have any harmful effect on aircrafts or pavements having the intended effect.

response

Noted

The comment on point (a) is not agreed, since this is a responsibility assigned to the aerodrome operator according to Annex Va.B.1.(e) of the BR.

The comment on point (c) is **partially agreed**. It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment

1882 comment by: *Pau Pyrénées Airport - PUF/LFBP*

(a) This paragraph is rather aimed to the competent authority than to the aerodrome operator and it should be in the AR part like it follows: « the ~~aerodrome operator~~ **competent authority** should prepare in collaboration with the aerodrome operator, ANSP, major aircraft operators... ».

The criterion for suspension of runway operation or of an aerodrome is the responsibility of the authority in France and not of the aerodrome operator who can nevertheless make the proposal.

(c) It is appropriate to delete the (c).
Currently, there is no known chemical that does not have any harmful effect on aircrafts or pavements having the intended effect.

response

Noted

The comment on point (a) is not agreed, since this is a responsibility assigned to the aerodrome operator according to Annex Va.B.1.(e) of the BR.

The comment on point (c) is partially agreed. It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment	1926 comment by: <i>Dublin Airport Authority</i>
	<p>This statement should be deleted as an Acceptable Means of Compliance. Formiates and acetates are currently used as de-icing chemicals on runways and taxiways at European airports affected by significant winter conditions. These chemicals are the most environmentally friendly currently available. If point (c) was to be considered the AMC, it is overly onerous on the aerodrome operator and imprecise, as there is no methodology established for determining what constitutes a "harmful effect" and who will determine what chemicals can be construed as such. It is also likely to run counter to existing European legislation in relation to environmental protection and should be left up to the national jurisdiction of each Member State to police and enforce requirements in this area.</p>
response	Partially accepted It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.
comment	1974 comment by: <i>Turin Airport - TRN/LIMF</i>
	<p>(C): the sentence has to be deleted: this type of chemicals is currently not available.</p> <p>Turin Airport support the analisis of Assaeroporti and ACI:</p> <p>Environmental protection in skid prevention is currently based on using formiates and acetates as de-icing chemicals instead of urea on runways and taxiways in Northern Europe. These chemicals are the most environmentally friendly on the market. If the point c) above enters into force, and if it would be interpreted as prohibition of formiates and acetates, it could effectively close/affect many airports in Northern Europe during the winter season.</p> <ul style="list-style-type: none">• The wording in the proposed amendment is not very precise as to what the definition of "harmful effects on aircraft and pavements" would include and who should decide it. It is, however, well known that some airlines and airframe manufactures are campaigning against the use of these environmentally friendly chemicals because of alleged corrosion.• The reason for using runway deicers is to improve the performance of the runways and taxiways with the intention to help the airlines giving their customers best/safest service. All known runway deicers do have impact either on runways, aircraft or environment.• There has been a long discussion going on in the SAE G122 regarding the test methods for runway deicers and how these products affects aircraft. This work is still ongoing, but it seems to take a while before acceptable test methods are available• Based on the discussion in the SAE G12, nobody has, as far as we are aware, documented any safety issue related to formiates and acetates. There is, however, a cost and maintenance issue. The extra maintenance cost for airport equipment is considered acceptable compared with the environmental benefits the environmental friendly deicers (formiates and acetates) have.

- Several measures have been carried out to protect the aircrafts and the carbon brakes over the last years, and the industry is also working hard to improve the runway and aircraft deicers.
- The proposed wording in the new EASA regulation could end up with a situation where formiates or acetates may be prohibited. This could lead to a conflict between EU Air safety legislation and Environment legislation. E.g the EU Water Directive describes storm water runoff from airports as a main source to organic load to water recipients.
- Based on today's technology the airports probably would have to reduce the consumption of runway deicers with approximately 90 % if formiates and acetates could no longer be used – this could also seriously affect safety, efficiency and punctuality of air traffic, since it could result in resilience in using enough runway deicers.

There is to our knowledge no evidence that deicing chemicals have a negative safety impact, but it is well documented that the negative effect on the environment is severe. A prohibition of formiates and acetates will in practice effectively close many airports in Northern Europe during the winter season.

response Partially accepted

It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment 2006 comment by: *Munich Airport International*

(c)

delete

Justification: this type of chemical is currently not available

response Partially accepted

It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment 2047 comment by: *Shannon Airport*

(c) This statement should be deleted as an Acceptable Means of Compliance. Formiates and acetates are currently used as de-icing chemicals on runways and taxiways at European airports affected by significant winder conditions. These chemicals are the most environmentally friendly currently available, if point (c) was to be considered the AMC, it is overly onerous on the aerodrome operator and imprecise, as there is no methodology established for determining what constitutes a "harmful effect" and who will determine what chemicals can be construed as such. It is also likely to run counter to existing European legislation in relation to environmental protection and should be left up to the national jurisdiction of each Member State to police and enforce requirements in this area.

response Partially accepted

It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment	2153	comment by: <i>Danish Transport Authority</i>
	(a) (c): The description of not using chemicals which may have harmful effects on aircrafts and pavements should not be standing alone. It could lead to the meaning that chemicals can not be used. The recommendation in ICAO Annex 14, subpart 10.2.12 should be implemented into this item. Proposal: " Chemicals to remove or to prevent the formation of winter contamination (ice and frost) on aerodrome pavements should be used when conditions indicate their use could be effective. Caution should be exercised in the application of the chemicals so as not to create a more slippery condition. The aerodrome operator should not use chemicals which may have harmful effects on aircraft or pavements.	
response	Partially accepted	
	It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.	

comment	2178	comment by: <i>Billund Airport - BLL/EKBI</i>
	<i>Page 158 - AMC-ADR-OPS.B.035 — Operations in winter (c):</i> "...(c) The aerodrome operator should not use chemicals which may have harmful effects on aircraft or pavements..."	
	This is in conflict with ADR-OPS.B.035: "ADR-OPS.B.035 — Operations in winter conditions ADD The aerodrome operator of aerodromes to be used during winter conditions shall establish and implement means and procedures to mitigate risks to aerodrome operations in such conditions."	
response	Noted	
	Point (c) has been revised in order to give more flexibility.	

comment	2202	comment by: <i>Flughafen Klagenfurt</i>
	(c) Start with "Whenever possible, the Aerodrome"	
	There are currently no chemicals that are non harmful to aircraft or pavement surfaces.	
response	Partially accepted	
	It is not appropriate to delete it, since it is an ICAO Standard, however the text is revised to give more flexibility.	

comment	2242	comment by: <i>Brussels Airport</i>
	AMC-ADR-OPS.B.035	
	To delete (c)	

	Aerodrome operator can only use the commercially available chemicals
response	Partially accepted It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment 2329 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

<u>Référence : AMC-ADR-OPS.B.035</u>	Operations in winter conditions
Proposition/commentaire	(a) Ce paragraphe s'adresse plutôt à l'autorité compétente qu'à l'exploitant et devrait être dans la partie AR ce qui donnerait : « the aerodrome operator competent authority should prepare in collaboration with the aerodrome operator , ANSP, major aircraft operators... ». (c) Il convient de supprimer le (c).
Justification	(a) Les critères de suspension des opérations sur les pistes ou d'un aéroport relève en France de l'autorité et non de l'exploitant d'aéroport. Ce dernier peut en faire la proposition. (c) À l'heure actuelle, il n'existe pas de produit connu qui n'ait pas d'effets négatifs sur les avions ni sur les chaussées en ayant l'efficacité recherchée.
Traduction de courtoisie	(a) This paragraph is rather aimed to the competent authority than to the aerodrome operator and it should be in the AR part like it follows: « the aerodrome operator competent authority should prepare in collaboration with the aerodrome operator , ANSP, major aircraft operators... ». The criterion for suspension of runway operation or of an aerodrome is the responsibility of the authority in France and not of the aerodrome operator who can nevertheless make the proposal. (c) It is appropriate to delete the (c). Currently, there is no known chemical that does not have any harmful effect on aircrafts or pavements having the intended effect.

response Noted

The comment on point (a) is not agreed, since this is a responsibility assigned to the aerodrome operator according to Annex Va.B.1.(e) of the BR.
The comment on point (c) is partially agreed. It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment

2434 comment by: *SEARD - Societe d'exploitation des Aeroports de Rennes et Dinard*

Attachment [#195](#)

SEARD NPA 2011-20 (B.II) AMC-ADR-OPS.B.035

Référence : AMC-ADR-OPS.B.035
Operations in winter conditions

Traduction de courtoisie

(a) This paragraph is rather aimed to the competent authority than to the aerodrome operator and it should be in the AR part like it follows: « the ~~aerodrome operator~~ competent authority should prepare in collaboration with the aerodrome operator, ANSP, major aircraft operators... ». The criterion for suspension of runway operation or of an aerodrome is the responsibility of the authority in France and not of the aerodrome operator who can nevertheless make the proposal.

(c) It is appropriate to delete the (c). Currently, there is no known chemical that does not have any harmful effect on aircrafts or pavements having the intended effect.

response

Noted

The comment on point (a) is not agreed, since this is a responsibility assigned to the aerodrome operator according to Annex Va.B.1.(e) of the BR.
The comment on point (c) is partially agreed. It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.

comment

2494 comment by: *DAA Cork Airport*

(c) This statement should be deleted as an Acceptable Means of Compliance. Formiates and acetates are currently used as de-icing chemicals on runways and taxiways at European airports affected by significant winter conditions. These chemicals are the most environmentally friendly currently available, if point was to be considered the AMC, it is overly onerous on the aerodrome operator and imprecise, as there is no methodology established for determining what constitutes a "harmful effect" and who will determine what chemicals can be construed as such. It is also likely to run counter to existing European legislation in relation to environmental protection and should be left up to the national jurisdiction of each Member State to police and enforce requirements in this area.

response

Partially accepted

It is not appropriate to delete it, since it is an ICAO Standard, however,

the text is revised to give more flexibility.

comment	2561 ❖	comment by: <i>ADV -German Airports Association</i>
	"Snow slush & ice"	
	Justification be aware and cross check with ICAO state letter since this will probably change consistency	
response	Accepted	

comment	2573	comment by: <i>ADV -German Airports Association</i>
	AMC.ADR.OPS.B.035	c)
	delete	
	Justification this type of chemical is currently not available	
response	Partially accepted	
	It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.	

comment	2671	comment by: <i>Fraport AG</i>
	AMC-ADR-OPS.B.035 — Operations in winter conditions (c)	
	Editorial	
	Complete paragraph	
	Delete complete paragraph	
	Fraport	AG
	This kind of chemicals are actual not available – if this paragraph would not be deleted it would be lead into the situation that a couple of aerodromes in northern Europe has to be closed during the winter period.	
response	Partially accepted	
	It is not appropriate to delete it, since it is an ICAO Standard, however, the text is revised to give more flexibility.	

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM1-ADR-OPS.B.035 – Aerodrome Snow Plan p. 159

comment	142	comment by: <i>CAA-NL</i>
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	<p>We suggest to delete item (b). There is no good reason to publish information about available snow clearing equipment in the AIP. The AIP should be kept clear of information not necessary for safety.</p>
response	<p>Not accepted</p> <p>This is required under ICAO Annex 15, Appendix 1, AD 2.7 Seasonal availability – clearing.</p>

comment	<p>699 comment by: <i>Athens International Airport S.A.</i></p> <p>Issue: It is suggested that the Aerodrome Operator should specify criteria for the suspension of RWY operations in cases of adverse weather conditions (including winter conditions). The Aerodrome Operator cannot specify such criteria for safe operations as this is part of the Aircraft Operator responsibilities.</p> <p>Justification: During winter operations, the airport operator is responsible to make every effort to keep the maneuvering area as clear as possible, given the prevailing conditions, and accurately report of the pavement condition. It is up to the aircraft operator, following its own procedures and authorisations, to decide whether using the RWY is safe. For the same RWY condition it is not unusual to see some airlines operating and some others not able to. The same applies in case of adverse weather conditions, such as strong winds, heavy rain, thunderstorms etc. when not only do aircraft operators operate under different standards but different aircraft types of the same operator would have different minima as well.</p>
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response	<p>Noted</p> <p>The Agency acknowledges the fact that aircraft operators, amongst other information, are using the pavement condition to determine the required distance for landing and take-off based on the Flight Manual of the aircraft. However, when, for example, the braking action of the runway is 'Nil', the aerodrome operator may decide to suspend runway operations.</p>
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<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC-ADR-OPS.B.040 – Night Operations</p>	<p>p. 159</p>
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comment	<p>1261 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>The collaboration with the ANSPs should be added according to AMC-ADR-OPS.B.045 (a)</p>
response	<p>Accepted</p> <p>Text revised accordingly to include the proposal.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC-ADR-OPS.B.045 – Low</p>	<p>p. 159-160</p>
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Visibility Operations

comment	311 comment by: <i>Danish Transport Authority</i> It should also be in collaboration with Apron Management service.
response	Accepted Point (a) has been revised to include the proposal.

comment	312 comment by: <i>Danish Transport Authority</i> The subject list should be supplemented or clarified with regards to subject (1) includes a SMGCS reference to AMC-ADR-OPS.B.030 and must also include taxiways; subject (3) should be altered to "surveillance and maintenancesystem of visual aids" with GM regarding the use of stopbars; subject added to the list a) sensitive areas (occurences could happen there work happens within the sensitive area); b) radio altimeter operating area; subject (4) surveillance of non-visual aids (borderline between aerodrome and ANSP).
response	Noted The purpose of point (d) in the proposed AMC is to identify areas which the aerodrome operator should focus during low visibility conditions. The visual aids, which are the part of the SMGCS that should be checked, are included in (3). In point (3) the proposal has been accepted, although no GM will be proposed on the use of stopbars because it is not appropriate to regulate the operation of ATC. In point (4) the proposal has been accepted and text revised to include the protection of critical and sensitive areas. The radio altimeter operating area if it has been established, is located in the pre-threshold area and for that reason the pre-threshold area has been included in (b) (1). The surveillance of the non-visual aids for proper functioning is normally responsibility of the Air Traffic services and the Agency considers inappropriate to assign this responsibility to the aerodrome operator.

comment	733 comment by: <i>ADP : Aeroports de Paris</i>						
	<table border="1"> <tr> <td>Référence : AMC-ADR-OPS.B.045</td> <td>Low Visibility Operations</td> </tr> <tr> <td>Proposition/commentaire</td> <td>(a) (b) (c) et (d): Il convient de modifier de la manière suivante: "low visibility procedures procedures for low visibility operations".</td> </tr> <tr> <td>Justification</td> <td>Il convient de procéder à cette modification pour des raisons de concordance avec le titre et de clarification.</td> </tr> </table>	Référence : AMC-ADR-OPS.B.045	Low Visibility Operations	Proposition/commentaire	(a) (b) (c) et (d): Il convient de modifier de la manière suivante: " low visibility procedures procedures for low visibility operations".	Justification	Il convient de procéder à cette modification pour des raisons de concordance avec le titre et de clarification.
Référence : AMC-ADR-OPS.B.045	Low Visibility Operations						
Proposition/commentaire	(a) (b) (c) et (d): Il convient de modifier de la manière suivante: " low visibility procedures procedures for low visibility operations".						
Justification	Il convient de procéder à cette modification pour des raisons de concordance avec le titre et de clarification.						

Traduction de courtoisie	(a) (b) (c) and (d): It is appropriate to modify in the following way: " low visibility procedures procedures for low visibility operations". This modification is to do for a reason of concordance with the title and for clarification.
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response

Noted

The Agency prefers to keep the term 'low visibility procedures' as it is already used in other domains like ATM and flight operations.

comment

981	comment by: <i>Union des Aéroports français - UAF</i>			
	Attachment #196			
UAF	NPA	2011-20	(B.II)	AMC-ADR-OPS.B.045
Référence		:		AMC-ADR-OPS.B.045
Low		Visibility		Operations
Traduction de courtoisie				
(a) (b) (c) and (d): It is appropriate to modify in the following way: " low visibility procedures procedures for low visibility operations". This modification is to do for a reason of concordance with the title and for clarification.				

response

Noted

The Agency prefers to keep the term 'low visibility procedures' as it is already used in other domains like ATM and flight operations.

comment

993 ❖	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
<u>1. Affected paragraphs</u>	
<ul style="list-style-type: none"> • Draft Commission Regulation - Article 2 - Definitions (p6-10) • AMC/GM to ANNEX III — Part-OPS — GM4-ADR-OPS.B.010 — Training of Rescue and Fire Fighting Personnel (p149-150) • AMC/GM to ANNEX III — Part-OPS — GM1-ADR-OPS.B.025 — Movement Area Driving Training (p156) • AMC/GM to ANNEX III — Part-OPS — AMC-ADR-OPS.B.045 - Low visibility operations (p159-160) 	
<u>2. Justification and proposed text / comment</u>	
This comment is linked with comment 1232 in book I.	
This comment is critical , as the drafted rules are confusing on this subject.	
When low visibility conditions occur, low visibility operations are activated. According to PANS-ATM (ICAO Doc 4444 - paragraph 7.12.3): "Low visibility operations shall be initiated by or through the aerodrome control tower."	
Concerning low visibility, Annex 14 Volume 1 only deals with procedures to be implemented by the aerodrome operator during low visibility	

conditions.

As a conclusion: ATM is in charge of initiating low visibility operations. Once these low visibility operations initiated, the aerodrome operator has to implement adequate procedures.

Consequently, the definition given in the cover regulation (p8) for "low visibility procedures" is not needed and even brings confusion between the aerodrome operator's procedures and the air navigation service provider's procedures. This definition is not an ICAO Annex 14 volume 1 (which does not use "Standard category I to III") and is an ATM definition: aerodrome operators are dealing with "procedures in low visibility conditions" or "procedures during low visibility operations". Their goal is to permit the implementation of LVP on the aerodrome in low visibility conditions that are when the RVR is less than 550 meters or when asked by the ANSP.

The wording of the implementing rule ADR-OPS.B.045 ("procedures for aerodrome operations in low visibility conditions") reflects correctly this duality and should be taken for the AMC. The definition of LVP should be deleted from the Cover Regulation to avoid confusion.

Therefore DGAC proposes:

Article 2 of the cover regulation:

~~"Low visibility procedures' means procedures applied at an aerodrome for the purpose of ensuring safe operations during lower than Standard Category I, other than Standard Category II, Category II and III conditions.~~

~~'Lower than Standard Category I operation' means a Category I instrument approach and landing operation using Category I Decision Height, with an RVR lower than would normally be associated with the applicable Decision Height but not lower than 400 m.~~

~~[...]~~

~~'Other than Standard Category II operation' means a precision instrument approach and landing operation using ILS or MLS where some or all of the elements of the precision approach Category II light system are not available, and with:~~

~~– Decision Height (DH) below 200 ft but not lower than 100 ft; and~~

~~– Runway Visual Range (RVR) of not less than 350 m."~~

GM4-ADR-OPS.B.010 – Training of Rescue and Fire Fighting Personnel

"(a) The training of rescue and fire-fighting personnel may include initial and recurrent training in at least the following areas:

[...]

(13) low visibility operations procedures;

[...]"

GM1-ADR-OPS.B.025 – Movement Area Driving Training

"(a) The training for driving on the movement area may include the following:

[...]

(7) low visibility operations procedures; and

[...]"

AMC-ADR-OPS.B.045 – Low visibility operations

"(a) The aerodrome operator should, in collaboration with ANSPs and major aircraft operators at the aerodrome establish low visibility means and procedures for aerodrome operations in low visibility conditions (LVP) if movement of aircraft is permitted when the RVR is less than 550

meters;

(b) ~~Low visibility~~ The procedures for aerodrome operations in low visibility conditions ~~(LVP)~~ should be approved by the competent authority before implementation;

(c) When the procedures for aerodrome operations in low visibility conditions ~~(LVP)~~ are in effect, the aerodrome operator should make available to AIS and/or ATS, as appropriate, information on the status of the aerodrome facilities;

(d) ~~The aerodrome operator should establish and implement procedures for aerodrome operations in low visibility conditions to~~ should ensure that, when ~~low visibility procedures (LVP)~~ they are in effect, persons and vehicles operating on an apron are restricted to the essential minimum;

(e) The procedures to be established by the aerodrome operator to ensure safe aerodrome operations during low visibility conditions should cover the following subjects:

- (1) physical characteristics of the runway environment, including approach and departure areas;
- (2) obstacle limitation surfaces;
- (3) visual aids compliant to AMC-ADR-OPS.B.040 (night operations);
- (4) non-visual aids;
- (5) secondary power supplies;
- (6) movement area safety;
- (7) RFFS."

response

Noted

ICAO Doc.4444 has a clear distinction between low visibility operations and operations in CAT II/III conditions. The first one deals with procedures when the manoeuvring area cannot be monitored visually by the control tower, which does not necessarily means that CAT II/III conditions prevail, while the second one is for CAT II/III weather conditions. ICAO is currently working on the revision of ICAO EUR Doc.013 in order to deal with operations in Reduced Aerodrome Visibility Conditions (RAVC) where the above mentioned cases are included. The LVP is not a term used exclusively by ATM. They are responsible for the initiation of LVPs, but this includes actions by the aerodrome operator, RFFS, security, etc. as well. The Agency prefers also to keep this term to ensure that a common terminology is used by aerodrome operator, ATM, and flight operations. The title of the text is changed to 'Low Visibility Procedures'. When the ICAO Guidance will be available, the corresponding IR and AMC will be revised.

comment

1262

comment by: Airport Nuremberg - NUE/EDDN

Establishing low visibility operations with the major aircraft operators at the aerodrome leads to a hindrance in the development and adds far more complexity than an potential advantage. Therefore it should be adequate to involve the Air Traffic Service Provider in the development process. The major aircraft provider can be involved in the context of the Runway Safety Team, but a general being forced of having to negotiate every adaptation or development with the major aircraft operators cannot be realized by the aerodrome operator. -> **Cancellation of "and major aircraft operators at the aerodrome" is essential.**

response

Accepted

Text revised accordingly.

comment	<p>1263 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>It is not clear what is meant by that and especially where the reference was taken from. Not all of the listed aspects are in fact in response of the aerodrome operator.</p>
response	<p>Noted</p> <p>The comment is not clearly understood, however, these provisions come from various ICAO material such as Annex 14, Doc.9476, ICAO EUR Doc.013, etc.</p>
comment	<p>1387 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #197</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC-ADR-OPS.B.045</p> <p>Référence : AMC-ADR-OPS.B.045 Low Visibility Operations</p> <p>Traduction de courtoisie (a) (b) (c) and (d): It is appropriate to modify in the following way: "low visibility procedures procedures for low visibility operations". This modification is to do for a reason of concordance with the title and for clarification.</p>
response	<p>Noted</p> <p>The Agency prefers to keep the term 'low visibility procedures' as it is already used in other domains like ATM and flight operations.</p>
comment	<p>1740 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>(a) (b) (c) and (d): It is appropriate to modify in the following way: "low visibility procedures procedures for low visibility operations". This modification is to do for a reason of concordance with the title and for clarification.</p>
response	<p>Noted</p> <p>The Agency prefers to keep the term 'low visibility procedures' as it is already used in other domains like ATM and flight operations.</p>
comment	<p>1800 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #198</p> <p>UAF NPA 2011-20 (B.II) AMC-ADR-OPS.B.045</p> <p>Référence : AMC-ADR-OPS.B.045 Low Visibility Operations</p> <p>Traduction de courtoisie (a) (b) (c) and (d): It is appropriate to modify in the following way: "low visibility procedures procedures for low visibility operations".</p>

response This modification is to do for a reason of concordance with the title and for clarification.

Noted

The Agency prefers to keep the term 'low visibility procedures' as it is already used in other domains like ATM and flight operations.

comment 1881 comment by: Pau Pyrénées Airport - PUF/LFBP

(a) (b) (c) and (d): It is appropriate to modify in the following way: "~~low visibility procedures~~ procedures for low visibility operations".
This modification is to do for a reason of concordance with the title and for clarification.

response Noted

The Agency prefers to keep the term 'low visibility procedures' as it is already used in other domains like ATM and flight operations.

comment 2330 comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

Référence : AMC-ADR-OPS.B.045	Low Visibility Operations
Proposition/commentaire	(a) (b) (c) et (d): Il convient de modifier de la manière suivante: " low visibility procedures procedures for low visibility operations".
Justification	Il convient de procéder à cette modification pour des raisons de concordance avec le titre et de clarification.
Traduction de courtoisie	(a) (b) (c) and (d): It is appropriate to modify in the following way: " low visibility procedures procedures for low visibility operations". This modification is to do for a reason of concordance with the title and for clarification.

response Noted

The Agency prefers to keep the term 'low visibility procedures' as it is already used in other domains like ATM and flight operations.

comment	313	comment by: Danish Transport Authority
	Low visibility operations should be provided with from ICAO Docs 9476 (SMGCS), ICAO Doc 9830 (A-SMGCS and ICAO EUR Doc 013 (Guidance material on aerodrome operations under limited visibility conditions).	
response	Noted	
comment	700	comment by: Athens International Airport S.A.
	<p>Issue: It is suggested that the Aerodrome Operator should specify criteria for the suspension of RWY operations in cases of adverse weather conditions (including winter conditions). The Aerodrome Operator cannot specify such criteria for safe operations as this is part of the Aircraft Operator responsibilities.</p> <p>Justification: During winter operations, the airport operator is responsible to make every effort to keep the maneuvering area as clear as possible, given the prevailing conditions, and accurately report of the pavement condition. It is up to the aircraft operator, following its own procedures and authorisations, to decide whether using the RWY is safe. For the same RWY condition it is not unusual to see some airlines operating and some others not able to. The same applies in case of adverse weather conditions, such as strong winds, heavy rain, thunderstorms etc. when not only do aircraft operators operate under different standards but different aircraft types of the same operator would have different minima as well.</p>	
response	Noted	
	The Agency acknowledges the fact that aircraft operators, amongst other information, are using the pavement condition to determine the required distance for landing and take-off based on the Flight Manual of the aircraft. However, when for example the braking action of the runway is 'Nil', the aerodrome operator may decide to suspend runway operations	
comment	1265	comment by: Airport Nuremberg - NUE/EDDN
	Neither ICAO nor national legislation demand that. The operations in adverse weather conditions should be regulated by the aerodrome operator individually by adapted and implemented procedures. Especially since thunderstorms, strong winds and heavy rain occur occasionally this should be left up as a part of daily operation of aerodromes and not be regulated by EASA regulation. This should further be a topic solely concerning aerodrome operations and not additional be negotiable with ANSPs, major aircraft operators at the aerodrome and third parties. This should be removed!	
response	Not accepted	
	This responsibility is stipulated by Annex Va, B.1.(e) of the BR.	
comment	2442	comment by: CAA SR
	This is not AMC. CAA SR preposes to delete whole paragraph from here: AMC ADR OPS.B.050 — Operations in adverse weather conditions The aerodrome operator should, together with the ANSPs and major	

~~aircraft operators at the aerodrome, and other parties, establish and implement procedures required to mitigate the risk of operation of the aerodrome under adverse weather conditions such as strong winds, heavy rain and thunderstorms, including the suspension of operations on the runway(s) if deemed necessary.~~

response Not accepted

This responsibility is stipulated by Annex Va, B.1.(e) of the BR.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – AMC-ADR-OPS.B.055 – Fuel quality**

p. 160

comment 143

comment by: CAA-NL

We suggest to delete this paragraph. This is already regulated in ADR.OR.D.025 – coordination with other relevant organisations. Furthermore it is not the aerodrome operators responsibility to ensure that organisations involved in storing and dispensing fuel to aircraft have procedures for fuel quality.

response Not accepted

There is a specific requirement in Annex Va, B.1.(g) for the aerodrome operator to ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification and the Agency prefers to address this issue separately.

comment 174

comment by: Swedavia AB - Swedish airports (currently 11 airports)

Move to GM. These paragraphs are today handled by the Air Operators IATA Fuel Quality Pool (IFQP).

response Not accepted

Irrespective of other arrangements, it is the responsibility of the aerodrome operator to ensure the existence of the procedures. However, the proposed GM allows the use of other audit reports in order to verify compliance.

comment 223

comment by: KLM

Change wording:

The aerodrome operator shall not be involved in ensuring the fuel quality; that is up to the oil companies and aircraft operators.

The sentence has to be rephrased to read: Delete in (a) 'either by itself or' and make it to read:

(a) The aerodrome operator should provide facilities for storing and dispensing of fuel to aircraft.
(b) The aerodrome operator should ensure through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to: etc

response Noted

Comments are not agreed since Annex Va, B.1.(g) allows the aerodrome operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft

comment 677 comment by: *Aéroport La Rochelle - LRH/LFBH*

Attachment [#199](#)

LFBH NPA 2011-20 (B.II) AMC-ADR-OPS.B.055

Référence : AMC-ADR-OPS.B.055
Fuel quality

Proposition/commentaire
(a) Il convient de modifier ce point de la manière suivante: "The aerodrome operator should ensure within the limits of its competences, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"
(a) (3) et (4) Il convient de supprimer ces points.

Justification
(a) L'exploitant d'aérodrome n'a pas toutes les compétences pour traiter de la qualité du carburant. Cela dépend de l'organisation institutionnelle du pays.
(a)(3) Ce point est hors du champ du règlement qui est uniquement relatif aux aérodromes.
Les "étapes appropriées" indiquées dans ce paragraphe ne sont pas suffisamment précises et pourraient remonter très en amont dans la chaîne de production et de livraison du fuel.
(a)(4) Ce n'est pas du ressort de l'exploitant d'aérodrome qui n'a pas la compétence nécessaire pour juger des qualifications adéquates et donc pour établir des arrangements formels.

response Not accepted

The responsibility of the aerodrome operator is to ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification. This is an oversight function for the aerodrome operator which does not require its involvement into the daily refuelling activities. It is acknowledged that the aerodrome operator may not have the technical knowledge to perform such an oversight function and for that reason the BR allows the subcontracting of this activity to a third party.

comment 735 comment by: *ADP : Aeroports de Paris*

Référence : AMC-ADR-	Fuel quality
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OPS.B.055	
Proposition/commentaire	<p>(a) Il convient de modifier ce point de la manière suivante: "The aerodrome operator should ensure within the limits of its competences, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"</p> <p>(a) (3) et (4) Il convient de supprimer ces points.</p>
Justification	<p>(a) L'exploitant d'aérodrome n'a pas toutes les compétences pour traiter de la qualité du carburant. Cela dépend de l'organisation institutionnelle du pays.</p> <p>(a)(3) Ce point est hors du champ du règlement qui est uniquement relatif aux aérodromes. Les "étapes appropriées" indiquées dans ce paragraphe ne sont pas suffisamment précises et pourraient remonter très en amont dans la chaîne de production et de livraison du fuel.</p> <p>(a)(4) Ce n'est pas du ressort de l'exploitant d'aérodrome qui n'a pas la compétence nécessaire pour juger des qualifications adéquates et donc pour établir des arrangements formels.</p>
Traduction de courtoisie	<p>(a) It is appropriate to modify in the following way: "The aerodrome operator should ensure within the limits of its competences, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"</p> <p>The aerodrome operator does not have all competencies to deal with the fuel quality. It depends on the institutional organisation of the country.</p> <p>(a) (3) et (4) It is appropriate to delete these points.</p> <p>The point (a) (3) is out of the Regulation scope which is only about aerodromes. The appropriate stages indicated in this paragraph are not sufficiently precise and could go back well upstream to the production chain and delivery of fuel.</p>

	<p>Concerning the point (a) (4), it does not fall within the competence of the aerodrome operator who does not have the competence necessary to evaluate the adequate qualifications and so, to establish formal arrangements.</p>
response	<p>Noted</p> <p>The phrase 'within the limits of its competences' had already been included in the Implementing Rule. When the aerodrome operator performs such an activity, he/she should ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification. This is an oversight function for the aerodrome operator which does not require its involvement into the daily refuelling activities. It is acknowledged that the aerodrome operator may not have the technical knowledge to perform such an oversight function and for that reason the BR allows the subcontracting of this activity to a third party</p>
comment	<p>869 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• ANNEX I - Part-AR - ADR.AR.B.005 (a) (2) — Management System (p20)• AMC/GM to ANNEX I — Part-AR — GM2-ADR.AR.B.005 AR-200(a) — Management system (p10)• ANNEX II - Part-OR - ADR.OR.D.015 — Personnel requirements (p51-52)• ANNEX II - Part-OR - ADR.OR.D.035 — Record keeping (p55)• AMC/GM to ANNEX II — Part-OR — AMC1-ADR.OR.D.015(e) — Personnel requirements (p100)• AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.D.015 AR200(e) — Personnel requirements (p100)• ANNEX III — Part-OPS - ADR-OPS.B.010 (a)(3) — Rescue and fire-fighting services (p65)• AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS. B.055 — Fuel quality (p160)• ANNEX III — Part-OPS —ADR-OPS.B.060 — Access to the movement area (p67-68) <p><u>2. Justification and proposed text / comment</u></p> <p>This comment is linked with comment 1120 in book I. This comment is critical, as this is linked to an important European directive, it would be very stringent to implement it and the specifications quoted contradict themselves.</p> <p>All personnel do not have to receive a "qualification", as such a system is very stringent and would induce administrative burden, due to the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions. This word ("qualification") should not be used with the meaning of the</p>

directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications.

All personnel do not have to receive a "qualification", as such a system is very stringent and would induce administrative burden, due to the directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions and it is very stringent.

However, it seems to be the meaning used here as specified in **AMC1-ADR.OR.D.015(e)**.

What is to be evaluated is the competency of people (including their training, their diploma, their skills). Training is generally adapted to the competency: some provisions use "competency" (which is adequate) and some others use "qualification".

Moreover, those specifications are not consistent as, for instance, GM2-ADR.AR.B.005 ~~AR.200(a)~~ which contradicts GM3-ADR.AR.B.005 (a)(2) which says that the aim is to ensure "personnel remain competent".

GM2-ADR.AR.B.005 ~~AR.200(a)~~ includes a non-adequate definition, and even say that "qualification does not necessarily imply competence", which is wrong.

It is consequently asked to delete references to "qualifications", which is an important remark from France, and to replace it by "competency". It is asked to delete references to the European directive, and to revise GM2-ADR.AR.B.005 ~~AR.200(a)~~ and GM3-ADR.AR.B.005 which define these words.

Proposal:

"ADR.AR.B.005 – Management system

(a) [...]

(2) [...] *Such personnel shall be ~~qualified~~ **competent** to perform their allocated tasks [...]"*

"GM2-ADR.AR.B.005 AR.200(a)(2) – Management system

~~QUALIFICATION~~ **COMPETENCY OF PERSONNEL**

*The term ~~qualification~~ **competency** denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree.*

~~Qualification~~ *It could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.*

~~Qualification does not necessarily imply competence.~~

Certain posts may by nature be associated with the possession of certain qualifications in a specific field (e.g. civil or electrical engineering, wildlife biology etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or community legislation."

"ADR.OR.D.015 – Personnel requirements

[...]

(d) *The aerodrome operator shall have sufficient and ~~qualified~~ **competent** personnel for the planned tasks and activities to be performed in*

accordance with the applicable requirements.

(e) The aerodrome operator shall maintain appropriate qualification, if relevant, and training records [...]"

"ADR.OR.D.035 – Record-keeping

[...]

(d) [...]

(5) personnel training, qualifications, if relevant, and medical records [...]"

"AMC1-ADR.OR.D.015(e) – Personnel requirements

DETERMINATION OF PERSONNEL NEEDS AND QUALIFICATIONS

(a) [...]

(b) The aerodrome operator should determine the required competencies qualifications, in accordance with the applicable requirements (and the national and European Union legislation where this is applicable, for qualifications), and include them in the aerodrome manual. A documented system with defined responsibilities should be in place, in order to identify any needs for changes with regard to personnel qualifications and/or competency."

"GM1-ADR.OR.D.015 AR200(e) – Personnel requirements

~~QUALIFICATION~~ **COMPETENCY OF PERSONNEL**

The term ~~qualification~~ competency denotes fitness for the purpose through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree. ~~Qualification~~ It could also be interpreted to mean capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.

~~Qualification does not necessarily imply competence.~~

Certain posts may by nature be associated with the possession of certain qualifications in a specific field (e.g. rescue and fire-fighting, civil, mechanical or electrical engineering, wildlife biology etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or European Union legislation."

ADR-OPS.B.010 – Rescue and fire-fighting services

"(a) [...]

(3) rescue and fire-fighting personnel are properly trained and equipped ~~and qualified~~ to operate in the aerodrome environment without prejudice to the system and legal provisions of the relevant Member State;

[...]"

AMC-ADR-OPS.B.055 – Fuel quality (linked with comment n°908 on responsibilities)

"(a) Without prejudice to the system and legal provisions of the relevant Member State, ~~t~~The aerodrome operator should ensure, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, ~~implement~~ have procedures to:

[...]

(4) Use adequately ~~qualified and~~ trained staff in storing, dispensing and otherwise handling fuel on the aerodrome."

response

Noted

The BR requires qualified personnel.

comment

938

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX III — Part-OPS — ADR-OPS.B.055 — Fuel quality (p67)
- AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS. B.055 — Fuel quality (p160)

2. Justification and proposed text / comment

This comment is linked with comment 1212 in book I.

In France, it is not an aerodrome operator's responsibility to perform oversight of fuel service providers: industry standards exist, the airlines and the fuel service providers have some responsibilities and some other authorities ("DRIRE") oversee fuel related matters. The current wording specifically assigns this responsibility to the aerodrome operator which is in contradiction with the French system and legal provisions. It is essential to provide flexibility for this item. Thus, DGAC proposes to indicate that this is done *"without prejudice to the system and legal provisions of the relevant Member State"*.

Moreover, in the corresponding AMC, the wording *"implement"* is too strong, DGAC proposes to take the wording used in ADR-OPS.B.055 instead: *"have"*.

Finally, the word *"qualified"* should be avoided considering it is referring to very specific terminology laid down in directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions.

ADR-OPS.B.055 — Fuel quality

"The aerodrome operator shall ensure verify that organisations involved in storing and dispensing of fuel to aircraft ensure they have procedures to verify that aircraft are provided with uncontaminated fuel and of the correct specification, without prejudice to the system and legal provisions of the relevant Member State."

AMC-ADR-OPS.B.055 — Fuel quality

"(a) Without prejudice to the system and legal provisions of the relevant Member State, tThe aerodrome operator should ensure verify, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement have procedures to:

- (1) Maintain the installations and equipment for storing and dispensing the fuel in such condition so as not to render unfit for use in aircraft;*
- (2) Mark such installations and equipment in a manner appropriate to the grade of the fuel;*
- (3) Take fuel samples at appropriate stages during the storing and dispensing of fuel to aircraft, and maintain records of such samples; and*
- (4) Use adequately ~~qualified~~ and trained staff in storing, dispensing and otherwise handling fuel on the aerodrome."*

response

Noted

Replacing the word 'implement' with 'have' is not appropriate since the existence of the procedures does not necessarily mean that they are implemented. Finally, as already explained in the IR, this responsibility is assigned to the aerodrome operator according to Annex Va, B.1.(g) of the BR.

comment

940

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX III — Part-OPS — ADR-OPS.B.055 — Fuel quality (p67)
- AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS. B.055 — Fuel quality (p160)

2. Justification and proposed text / comment

In France, it is not an aerodrome operator's responsibility to perform oversight of fuel service providers: industry standards exist, the airlines and the fuel service providers have some responsibilities and some other authorities ("DRIRE") oversee fuel related matters. The current wording specifically assigns this responsibility to the aerodrome operator which is in contradiction with the French system and legal provisions. It is essential to provide flexibility for this item. Thus, DGAC proposes to indicate that this is done *"without prejudice to the system and legal provisions of the relevant Member State"*.

Moreover, in the corresponding AMC, the wording *"implement"* is too strong, DGAC proposes to take the wording used in ADR-OPS.B.055 instead: *"have"*.

Finally, the word *"qualified"* should be avoided considering it is referring to very specific terminology laid down in directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions.

ADR-OPS.B.055 — Fuel quality

"The aerodrome operator shall ensure that organisations involved in storing and dispensing of fuel to aircraft have procedures to verify that aircraft are provided with uncontaminated fuel and of the correct specification, without prejudice to the system and legal provisions of the relevant Member State."

AMC-ADR-OPS.B.055 — Fuel quality

"(a) Without prejudice to the system and legal provisions of the relevant Member State, tThe aerodrome operator should ensure, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, ~~implement~~ have procedures to:

- (1) Maintain the installations and equipment for storing and dispensing the fuel in such condition so as not to render unfit for use in aircraft;*
- (2) Mark such installations and equipment in a manner appropriate to the grade of the fuel;*
- (3) Take fuel samples at appropriate stages during the storing and dispensing of fuel to aircraft, and maintain records of such samples; and*
- (4) Use adequately ~~qualified~~ and trained staff in storing, dispensing and otherwise handling fuel on the aerodrome."*

response

Noted

Replacing the word 'implement' with 'have' is not appropriate since the existence of the procedures does not necessarily mean that they are implemented. Finally, as already explained in the IR, this responsibility is assigned to the aerodrome operator according to Annex Va, B.1.(g) of the BR

comment

984 comment by: *Union des Aéroports français - UAF*

Attachment [#200](#)

UAF	NPA	2011-20	(B.II)	AMC-ADR-OPS.B.055
Référence		:		AMC-ADR-OPS.B.055
Fuel				quality

Traduction de courtoisie

(a) It is appropriate to modify in the following way: "The aerodrome operator should ensure **within the limits of its competences**, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"

The aerodrome operator does not have all competencies to deal with the fuel quality. It depends on the institutional organisation of the country.

(a) (3) et (4) It is appropriate to delete these points. The point (a) (3) is out of the Regulation scope which is only about aerodromes. The appropriate stages indicated in this paragraph are not sufficiently precise and could go back well upstream to the production chain and delivery of fuel. Concerning the point (a) (4), it does not fall within the competence of the aerodrome operator who does not have the competence necessary to evaluate the adequate qualifications and so, to establish formal arrangements.

response

Noted

The phrase 'within the limits of its competences' had already been included in the Implementing Rule. When the aerodrome operator performs such an activity, he/she should ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification. This is an oversight function for the aerodrome operator which does not require its involvement into the daily refuelling activities. It is acknowledged that the aerodrome operator may not have the technical knowledge to perform such an oversight function and for that reason the BR allows the subcontracting of this activity to a third party

comment

1266 comment by: *Airport Nuremberg - NUE/EDDN*

Airports can neither directly nor physically ensure quality within the contracts between airlines and fueling companies. It needs to be clarified that this task is not in response of the aerodrome operator or can be delegated to the according fuel company.

response

Noted

The responsibility of the aerodrome operator is to ensure that procedures

exist to provide aircraft with fuel which is uncontaminated and of the correct specification. If the aerodrome doesn't have the technical knowledge to perform this task, it can be subcontracted to a third party which has the necessary technical knowledge and qualification, as already mentioned in the proposed IR and AMC.

comment

1388

comment by: *Euroairport Bâle-Mulhouse*

Attachment [#201](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC-ADR-OPS.B.055

Référence : AMC-ADR-OPS.B.055
Fuel quality

Traduction de courtoisie
(a) It is appropriate to modify in the following way: "The aerodrome operator should ensure within the limits of its competences, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"

The aerodrome operator does not have all competencies to deal with the fuel quality. It depends on the institutional organisation of the country.
(a) (3) et (4) It is appropriate to delete these points. The point (a) (3) is out of the Regulation scope which is only about aerodromes. The appropriate stages indicated in this paragraph are not sufficiently precise and could go back well upstream to the production chain and delivery of fuel. Concerning the point (a) (4), it does not fall within the competence of the aerodrome operator who does not have the competence necessary to evaluate the adequate qualifications and so, to establish formal arrangements.

response

Not accepted

The phrase 'within the limits of its competences' had already been included in the Implementing Rule. When the aerodrome operator performs such an activity should ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification. This is an oversight function for the aerodrome operator which does not require its involvement into the daily refuelling activities. It is acknowledged that the aerodrome operator may not have the technical knowledge to perform such an oversight function and for that reason the BR allows the subcontracting of this activity to a third party.

comment

1626

comment by: *MST / STR - Stuttgart Airport*

- We again have the wording "**ensure**" here.
- **Please replace "ensure" with "monitor"!**
- **As already mentioned in other comments to this EASA-NPA the term "ensure" can be interpreted in such a way that the obligations of the aerodrome operator are inadequately expanded which will cause enormous and additional risks of**

liability for the aerodrome operator.

- **According to german understanding of law and legal practice the term "ensure" could lead to an unlimited liability of the aerodrome operator having a sort of guarantor position.**
- **Thus a third party which may be affected through substandard fuel quality for example (e.g. an airline) may file a claim not only against the organisations that store and dispense fuel to aircraft ("the provider") but also - as codebtor - against the aerodrome operator.**
- **This is neither insurable nor controllable für the aerodrome operator!**
- **Therefore it has to be clarified:**
 1. **that the aerodrome operator on the one hand should implement formal arrangements with these providers / organisations (where not implemented so far).**
 2. **but it should also be stipulated by EASA (in the IR!) that the aerodrome operator is not liable for this (under NO circumstances) especially according to civil / private law.**
 3. **If the aerodrome operator injures its obligations under EASA-NPA - as the case may be - the authority may cause certain actions out of that. But it has to be absolutely sufficient if the aerodrome operator enters into formal arrangements and obtains a written confirmation from "the providers" (on a regular basis from time to time) that they have fulfilled and will fulfill the EASA-NPA (here: fuel quality).**

General annotation:

The same problem we do see with regard to other provisions of this EASA-NPA where the term "ensure" is used. Please consider our comments above concerning ADR-OR.D.025 + corresponding AMC!

response Noted

The aerodrome operator is responsible for the safe aerodrome operations. A lot of service providers and airlines are operating daily on an aerodrome. Annex Va of the BR had assigned a number of responsibilities for the aerodrome operator. For some of them, the aerodrome operator has the direct responsibility for the implementation, thus the words 'establish' and 'implement' are used, while for some others its responsibility is to 'ensure'.

comment

1742

comment by: *Aéroport de Marseille - MRS/LFML*

(a) It is appropriate to modify in the following way: "The aerodrome

The phrase 'within the limits of its competences' had already been included in the Implementing Rule. When the aerodrome operator performs such an activity, he/she should ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification. This is an oversight function for the aerodrome operator which does not require its involvement into the daily refuelling activities. It is acknowledged that the aerodrome operator may not have the technical knowledge to perform such an oversight function and for that reason the BR allows the subcontracting of this activity to a third party.

comment 1844 comment by: AIRBUS
 We suggest to add the following:
 Further guidance on jet fuel supply is expected to be found in ICAO Doc 9977.

response Noted
 ICAO has published an unedited version of Doc.9977. There is a number of initiatives to address the fuel quality issue. The Agency is following the developments and more material will be included in the future.

comment 1862 comment by: ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD

Attachment [#203](#)
 ADBM - NPA 2011-20 (B.II) AMC-ADR-OPS.B.055
 Référence : AMC-ADR-OPS.B.055
 Fuel quality
 Traduction de courtoisie
 (a) It is appropriate to modify in the following way: "The aerodrome operator should ensure **within the limits of its competences**, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"
 The aerodrome operator does not have all competencies to deal with the fuel quality. It depends on the institutional organisation of the country.
 (a) (3) et (4) It is appropriate to delete these points. The point (a) (3) is out of the Regulation scope which is only about aerodromes. The appropriate stages indicated in this paragraph are not sufficiently precise and could go back well upstream to the production chain and delivery of fuel.
 Concerning the point (a) (4), it does not fall within the competence of the aerodrome operator who does not have the competence necessary to evaluate the adequate qualifications and so, to establish formal arrangements.

response Not accepted
 The phrase 'within the limits of its competences' had already been included in the Implementing Rule. When the aerodrome operator performs such an activity, he/she should ensure that procedures exist to

provide aircraft with fuel which is uncontaminated and of the correct specification. This is an oversight function for the aerodrome operator which does not require its involvement into the daily refuelling activities. It is acknowledged that the aerodrome operator may not have the technical knowledge to perform such an oversight function and for that reason the BR allows the subcontracting of this activity to a third party.

comment

1880

comment by: Pau Pyrénées Airport - PUF/LFBP

(a) It is appropriate to modify in the following way: "The aerodrome operator should ensure **within the limits of its competences**, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"

The aerodrome operator does not have all competencies to deal with the fuel quality. It depends on the institutional organisation of the country.

(a) (3) et (4) It is appropriate to delete these points.

The point (a) (3) is out of the Regulation scope which is only about aerodromes. The appropriate stages indicated in this paragraph are not sufficiently precise and could go back well upstream to the production chain and delivery of fuel.

Concerning the point (a) (4), it does not fall within the competence of the aerodrome operator who does not have the competence necessary to evaluate the adequate qualifications and so, to establish formal arrangements.

The refueler must remain responsible for the quality of his fuel and he must be a warrant of it.

response

Not accepted

The phrase 'within the limits of its competences' had already been included in the Implementing Rule. When the aerodrome operator performs such an activity, he/she should ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification. This is an oversight function for the aerodrome operator which does not require its involvement into the daily refuelling activities. It is acknowledged that the aerodrome operator may not have the technical knowledge to perform such an oversight function and for that reason the BR allows the subcontracting of this activity to a third party.

comment

2089

comment by: IATA

AMC-ADR-OPS.B.055 – Fuel quality

Change wording:

The aerodrome operator shall not be involved in ensuring the fuel quality; that is up to the oil companies and aircraft operators.

The sentence has to be rephrased to read: Delete in (a) 'either by itself or' and make it to read:

(a) The aerodrome operator should provide facilities for storing and dispensing of fuel to aircraft.

(b) The aerodrome operator should ensure through formal arrangements

	<p>with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to: etc</p>
<p>response</p>	<p><u>Not accepted</u></p> <p>Comments are not agreed since Annex Va, B.1.(g) allows the aerodrome operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft.</p>
<p>comment</p>	<p>2120 comment by: <i>AENA - Aeropuertos Españoles y Navegación Aérea</i></p> <p>In Spain, it is not an aerodrome operator's responsibility to perform oversight of fuel service providers: industry standards exist, the airlines and the fuel service providers have some responsibilities and some other authorities oversee fuel related matters. The current wording specifically assigns this responsibility to the aerodrome operator which is in contradiction with the Spanihs system and legal provisions. It is essential to provide flexibility for this item. Thus, It is proposes to indicate that this is done <i>"without prejudice to the system and legal provisions of the relevant Member State"</i>.</p> <p>Moreover, in the corresponding AMC, the wording <i>"implement"</i> is too strong, It is proposed to take the wording used in ADR-OPS.B.055 instead: <i>"have"</i>.</p> <p>Finally, the word <i>"qualified"</i> should be avoided considering it is referring to very specific terminology laid down in directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications: France already transposed this directive for some professions.</p> <p>ADR-OPS.B.055 – Fuel quality <i>"The aerodrome operator competent authority shall ensure that organisations involved in storing and dispensing of fuel to aircraft have procedures to verify that aircraft are provided with uncontaminated fuel and of the correct specification."</i></p> <p>AMC-ADR-OPS.B.055 – Fuel quality <i>"(a) Without prejudice to the system and legal provisions of the relevant Member State, tThe aerodrome operator competent authority should ensure, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement have procedures to:</i></p> <p><i>(1) Maintain the installations and equipment for storing and dispensing the fuel in such condition so as not to render unfit for use in aircraft;</i> <i>(2) Mark such installations and equipment in a manner appropriate to the grade of the fuel;</i> <i>(3) Take fuel samples at appropriate stages during the storing and dispensing of fuel to aircraft, and maintain records of such samples; and</i> <i>(4) Use adequately qualified and trained staff in storing, dispensing and otherwise handling fuel on the aerodrome."</i></p>
<p>response</p>	<p>Noted</p> <p>Annex Va, B.1.(g) assigns the responsibility to the aerodrome operator to ensure that procedures are in place to provide aircraft with fuel which is uncontaminated and of the correct specification. Concerning the use of 'qualified' personnel, throughout the BR there is a requirement for such</p>

personnel. Lastly the replacement of the word 'implement' with the word 'have' is not accepted since the existence of a procedure does not necessarily mean that is also applied.

comment

2332

comment by: ACA - Aéroports de la Côte d'Azur - NCE/LFMN

<u>Référence : AMC-ADR-OPS.B.055</u>	Fuel quality
Proposition/commentaire	<p>(a) Il convient de modifier ce point de la manière suivante: "The aerodrome operator should ensure within the limits of its competences, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"</p> <p>(a) (3) et (4) Il convient de supprimer ces points.</p>
Justification	<p>(a) L'exploitant d'aérodrome n'a pas toutes les compétences pour traiter de la qualité du carburant. Cela dépend de l'organisation institutionnelle du pays.</p> <p>(a)(3) Ce point est hors du champ du règlement qui est uniquement relatif aux aérodromes. Les "étapes appropriées" indiquées dans ce paragraphe ne sont pas suffisamment précises et pourraient remonter très en amont dans la chaîne de production et de livraison du fuel.</p> <p>(a)(4) Ce n'est pas du ressort de l'exploitant d'aérodrome qui n'a pas la compétence nécessaire pour juger des qualifications adéquates et donc pour établir des arrangements formels.</p>
Traduction de courtoisie	<p>(a) It is appropriate to modify in the following way: "The aerodrome operator should ensure within the limits of its competences, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"</p> <p>The aerodrome operator does not have all competencies to deal with the fuel quality. It depends on the institutional organisation of the country.</p> <p>(a) (3) et (4) It is appropriate to delete</p>

these points.
 The point (a) (3) is out of the Regulation scope which is only about aerodromes. The appropriate stages indicated in this paragraph are not sufficiently precise and could go back well upstream to the production chain and delivery of fuel. Concerning the point (a) (4), it does not fall within the competence of the aerodrome operator who does not have the competence necessary to evaluate the adequate qualifications and so, to establish formal arrangements.

response

Noted

The phrase 'within the limits of its competences' had already been included in the Implementing Rule. When the aerodrome operator performs such an activity, he/she should ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification. This is an oversight function for the aerodrome operator which does not require its involvement into the daily refuelling activities. It is acknowledged that the aerodrome operator may not have the technical knowledge to perform such an oversight function and for that reason the BR allows the subcontracting of this activity to a third party.

comment

2435 comment by: *SEARD - Societe d'exploitation des Aeroports de Rennes et Dinard*

Attachment [#204](#)

SEARD NPA 2011-20 (B.II) AMC-ADR-OPS.B.055

Référence : AMC-ADR-OPS.B.055
 Fuel quality

Traduction de courtoisie

(a) It is appropriate to modify in the following way: "The aerodrome operator should ensure **within the limits of its competences**, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:"

The aerodrome operator does not have all competencies to deal with the fuel quality. It depends on the institutional organisation of the country.

(a) (3) et (4) It is appropriate to delete these points. The point (a) (3) is out of the Regulation scope which is only about aerodromes. The appropriate stages indicated in this paragraph are not sufficiently precise and could go back well upstream to the production chain and delivery of fuel. Concerning the point (a) (4), it does not fall within the competence of the aerodrome operator who does not have the competence necessary to evaluate the adequate qualifications and so, to establish formal arrangements.

response Noted

The phrase 'within the limits of its competences' had already been included in the Implementing Rule. When the aerodrome operator performs such an activity, he/she should ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification. This is an oversight function for the aerodrome operator which does not require its involvement into the daily refuelling activities. It is acknowledged that the aerodrome operator may not have the technical knowledge to perform such an oversight function and for that reason the BR allows the subcontracting of this activity to a third party.

comment 2497 comment by: CAA SR

This is not enough as AMC. CAA SR suggests to use some of the industry standards as a JIG 1 or JIG 4 for auditing fuel quality on the aerodromes, which are complex and cover all kind of aerodromes.

AMC-ADR-OPS.B.055 — Fuel quality
(a) The aerodrome operator should ensure, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:

- (1) Maintain the installations and equipment for storing and dispensing the fuel in such condition so as not to render unfit for use in aircraft;
- (2) Mark such installations and equipment in a manner appropriate to the grade of the fuel;
- (3) Take fuel samples at appropriate stages during the storing and dispensing of fuel to aircraft, and maintain records of such samples; and
- (4) Use adequately qualified and trained staff in storing, dispensing and otherwise handling fuel on the aerodrome.

response Noted

The Agency is aware that some industry standards (JIG, IATA) exist which can be used for auditing fuel quality procedures. ICAO had already published as well an unedited version of Doc.9977 dealing with aviation jet fuel quality at aerodromes. There are also some other initiatives to address this issue. The Agency is following the developments and will include more information in the future.

comment 2506 comment by: AEA - Association of European Airlines

AMC-ADR-OPS.B.055 — Fuel quality
(a) The aerodrome operator should ensure, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:

- (1) Maintain the installations and equipment for storing and dispensing the fuel in such condition so as not to render unfit for use in aircraft;

(2) Mark such installations and equipment in a manner appropriate to the grade of the fuel;
(3) Take fuel samples at appropriate stages during the storing and dispensing of fuel to aircraft, and maintain records of such samples; and
(4) Use adequately qualified and trained staff in storing, dispensing and otherwise handling fuel on the aerodrome.

Comments

Delete:

Both AMC and GM to be deleted in total.

The aerodrome operator is responsible for providing facilities for fuel storage but shall not be involved in fuel quality as this is up to oil companies and aircraft operators only.

response

Not accepted

Comments are not accepted since Annex Va, B.1.(g) allows the aerodrome operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft.

comment

2512

comment by: *AEA - Association of European Airlines*

AMC-ADR-OPS.B.055 – Fuel quality

(a) The aerodrome operator should ensure, **either by itself or** through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:

- (1) Maintain the installations and equipment for storing and dispensing the fuel in such condition so as not to render unfit for use in aircraft;
- (2) Mark such installations and equipment in a manner appropriate to the grade of the fuel;
- (3) Take fuel samples at appropriate stages during the storing and dispensing of fuel to aircraft, and maintain records of such samples; and
- (4) Use adequately qualified and trained staff in storing, dispensing and otherwise handling fuel on the aerodrome.

Comments

Change wording:

The aerodrome operator shall not be involved in ensuring the fuel quality; that is up to the oil companies and aircraft operators.

The sentence has to be rephrased to read: Delete in (a) 'either by itself or' and make it to read:

(a) The aerodrome operator should provide facilities for storing and dispensing of fuel to aircraft.

(b) The aerodrome operator should ensure through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to: etc

response Not accepted

Comments are not agreed since Annex Va, B.1.(g) allows the aerodrome operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – GM-ADR-OPS.B.055 – Fuel quality p. 161

comment 144 comment by: CAA-NL

We suggest to delete this paragraph. This is already regulated in ADR.OR.D.025 – coordination with other relevant organisations. Furthermore it is not the aerodrome operators responsibility to ensure that organisations involved in storing and dispensing fuel to aircraft have procedures for fuel quality.

response Not accepted

There is a specific requirement in Annex Va, B.1.(g) for the aerodrome operator to ensure that procedures exist to provide aircraft with fuel which is uncontaminated and of the correct specification and the Agency prefers to address this issue separately.

comment 217 comment by: KLM

Delete:

Both AMC and GM to be deleted in total.

The aerodrome operator is responsible for providing facilities for fuel storage but shall not be involved in fuel quality as this is up to oil companies and aircraft operators only.

response Not accepted

Comments are not agreed since Annex Va, B.1.(g) allows the aerodrome operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft.

comment 218 comment by: KLM

Delete

Both AMC and GM to be deleted in total. The aerodrome operator is responsible for providing facilities for fuel storage but shall not be involved in fuel quality as this is up to oil companies and aircraft operators only

response Not accepted

Comments are not agreed since Annex Va, B.1.(g) allows the aerodrome

operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft.

comment

224

comment by: *KLM*

Delete

This whole chapter to be deleted as an aerodrome operator shall not get involved in the fuel quality as this is a matter between the oil company and the aircraft operator. No involvement of an aerodrome operator is desired or useful and no competence of the subject can be expected by the aerodrome operator. This is with the oil company and the aircraft operator, who knows what kind of fuel shall be loaded into a specific aircraft.

response

Not accepted

Comments are not agreed since Annex Va, B.1.(g) allows the aerodrome operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft.

comment

2090

comment by: *IATA*

GM-ADR-OPS.B.055 — Fuel quality

Delete

This whole chapter to be deleted as an aerodrome operator shall not get involved in the fuel quality as this is a matter between the oil company and the aircraft operator. No involvement of an aerodrome operator is desired or useful and no competence of the subject can be expected by the aerodrome operator. This is with the oil company and the aircraft operator, who knows what kind of fuel shall be loaded into a specific aircraft.

response

Not accepted

Comments are not agreed since Annex Va, B.1.(g) allows the aerodrome operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft.

comment

2317

comment by: *Roskilde Airport*

Roskilde Airport (EKRK):
We agree to the described level and method of supervision with the fuel provider.

response

Noted

comment

2507

comment by: *AEA - Association of European Airlines*

GM-ADR-OPS.B.055 — Fuel quality

The aerodrome operator, in order to ensure compliance, may use:
(a) audit reports to organisations involved in storing and dispensing of fuel to aircraft, or
(b) relevant national procedures providing for the assurance of fuel quality.

Comments

Delete

Both AMC and GM to be deleted in total. The aerodrome operator is responsible for providing facilities for fuel storage but shall not be involved in fuel quality as this is up to oil companies and aircraft operators only

response Not accepted

Comments are not agreed since Annex Va, B.1.(g) allows the aerodrome operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft,

comment 2513 comment by: *AEA - Association of European Airlines*

GM-ADR-OPS.B.055 – Fuel quality

The aerodrome operator, in order to ensure compliance, may use:
(a) audit reports to organizations involved in storing and dispensing of fuel to aircraft, or
(b) relevant national procedures providing for the assurance of fuel quality.

Comments

Delete

This whole chapter to be deleted as an aerodrome operator shall not get involved in the fuel quality as this is a matter between the oil company and the aircraft operator. No involvement of an aerodrome operator is desired or useful and no competence of the subject can be expected by the aerodrome operator. This is with the oil company and the aircraft operator, who knows what kind of fuel shall be loaded into a specific aircraft.

response Not accepted

Comments are not agreed since Annex Va, B.1.(g) allows the aerodrome operator to perform the oversight function by itself, and secondly it is not always the responsibility of the aerodrome operator to provide facilities for storing and dispensing of fuel to aircraft.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC-ADR-OPS.B.060 – Access to the movement area p. 161

comment 736 comment by: *ADP : Aeroports de Paris*

Référence : AMC-ADR-OPS.B.060	Access to the movement area
Proposition/commentaire	Doit-on ajouter ce système en plus de celui relatif à la sûreté aéroportuaire? Si oui, il y a un fort risque de lourdeur administrative.
Justification	
Traduction de courtoisie	Do we have to add this system to the one about airport security? If yes, there is a high risk of administrative red tapes.

response Accepted
Point (a) (3) has been deleted.

comment 986 comment by: *Union des Aéroports français - UAF*
Attachment [#205](#)
UAF NPA 2011-20 (B.II) AMC-ADR-OPS.B.060
Référence : AMC-ADR-OPS.B.060
Access to the movement area
Traduction de courtoisie
Do we have to add this system to the one about airport security? If yes, there is a high risk of administrative red tapes.

response Accepted
Point (a) (3) has been deleted.

comment 1267 comment by: *Airport Nuremberg - NUE/EDDN*
An access control system is more likely concerning the whole sensible area or the manoeuvring area, not explicitly regulating the movement area. This regulation should be flexible enough, so that aerodromes do not have to change their whole access and surveillance system. Therefore it should only be specified that persons accessing the movement area have received an adequate training. The actual access to the movement area and the authorisation to be on the movement area should be moved to guidance material, since there is already a regulation for the sensible area and all further regulations on the movement area exclusively would especially harm and disadvantage smaller and medium sized aerodromes!

response Accepted
Point (a) (3) has been deleted.

comment 1390 comment by: *Euroairport Bâle-Mulhouse*
Attachment [#206](#)

	Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC-ADR-OPS.B.060
	Référence : AMC-ADR-OPS.B.060 Access to the movement area
	Traduction de courtoisie Do we have to add this system to the one about airport security? If yes, there is a high risk of administrative red tapes.
response	Accepted Point (a) (3) has been deleted.

comment	1743 comment by: <i>Aéroport de Marseille - MRS/LFML</i> Do we have to add this system to the one about airport security? If yes, there is a high risk of administrative red tapes.
response	Accepted Point (a) (3) has been deleted.

comment	1802 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i> Attachment #207 UAF NPA 2011-20 (B.II) AMC-ADR-OPS.B.060 Référence : AMC-ADR-OPS.B.060 Access to the movement area Traduction de courtoisie Do we have to add this system to the one about airport security? If yes, there is a high risk of administrative red tapes.
response	Accepted Point (a) (3) has been deleted.

comment	1879 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i> Do we have to add this system to the one about airport security? If yes, there is a high risk of administrative red tapes. If it is so, both system must be complementary and in one and under the competent authority.
response	Accepted Point (a) (3) has been deleted.

comment	2334 comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i>				
	<table border="1"> <tr> <td>Référence : AMC-ADR-OPS.B.060</td> <td>Access to the movement area</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Doit-on ajouter ce système en plus de celui relatif à la sûreté aéroportuaire? Si</td> </tr> </table>	Référence : AMC-ADR-OPS.B.060	Access to the movement area	Proposition/commentaire	Doit-on ajouter ce système en plus de celui relatif à la sûreté aéroportuaire? Si
Référence : AMC-ADR-OPS.B.060	Access to the movement area				
Proposition/commentaire	Doit-on ajouter ce système en plus de celui relatif à la sûreté aéroportuaire? Si				

	oui, il y a un fort risque de lourdeur administrative.
Justification	
Traduction de courtoisie	Do we have to add this system to the one about airport security? If yes, there is a high risk of administrative red tapes.
response	Noted Point (a) (3) has been deleted.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM- ADR-OPS.B.060 – Access to the movement area p. 161-162

comment	1860 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i> Attachment #208 ADBM - NPA 2011-20 (B.II) AMC-ADR-OPS.B.060 Référence : AMC-ADR-OPS.B.060 Access to the movement area Traduction de courtoisie Do we have to add this system to the one about airport security? If yes, there is a high risk of administrative red tapes.
response	Accepted Point (a) (3) on AMC - ADR.OPS.B.060 has been deleted.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC-ADR-OPS.B.065 – Visual Aids and Aerodrome Electrical Systems p. 162

comment	1208 comment by: <i>Federal Office of Civil Aviation FOCA</i> Parag. (b) and (c) should be deleted. The ANS provider does not have any competence or interests in visual aids. Solely the aerodrome operator is responsible
response	Not accepted In most of the cases, the air traffic services provider is responsible for the operation of the visual aids.

comment	2020 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i> delete articles (c) and (b). ANS is not the proper authority for this.
response	Not accepted In most of the cases the air traffic services provider is responsible for the operation of the visual aids.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM-ADR-OPS.B.065 – Visual aids	p. 162
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comment	37 comment by: <i>ACI EUROPE - Airports Council International</i> move to definitions Justification: should not be GM
response	Accepted The GM has been deleted and moved to definitions.

comment	191 comment by: <i>SWISS AERODROMES ASSOCIATION</i> This is a definition which has to take place in the appropriate chapter
response	Accepted The GM has been deleted and moved to definitions.

comment	302 comment by: <i>CAA Austria - Ministry of Transport</i> This article should be moved to the definitions section
response	Accepted The GM has been deleted and moved to definitions.

comment	366 comment by: <i>Avinor</i> GM.ADR.OPS.B.065. This should be moved to definitions.
response	Accepted The GM has been deleted and moved to definitions.

comment	738 comment by: <i>ADP : Aeroports de Paris</i>				
	<table border="1"> <tr> <td>Référence : GM-ADR-OPS.B.065</td> <td>Visual aids</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Cette disposition doit plutôt figurer</td> </tr> </table>	Référence : GM-ADR-OPS.B.065	Visual aids	Proposition/commentaire	Cette disposition doit plutôt figurer
Référence : GM-ADR-OPS.B.065	Visual aids				
Proposition/commentaire	Cette disposition doit plutôt figurer				

	dans les définitions.
Justification	
Traduction de courtoisie	This provision must appear in definitions.
response	Accepted The GM has been deleted and moved to definitions.

comment	966	comment by: <i>Cologne/Bonn Airport</i>
	definition, not GM	
response	Accepted	The GM has been deleted and moved to definitions.

comment	987	comment by: <i>Union des Aéroports français - UAF</i>
	Attachment #209	
	UAF	NPA 2011-20 (B.II) GM-ADR-OPS.B.065
	Référence Visual	: GM-ADR-OPS.B.065 aids
	Traduction de courtoisie	de courtoisie
	This provision must appear in definitions.	
response	Accepted	The GM has been deleted and moved to definitions.

comment	1207	comment by: <i>Federal Office of Civil Aviation FOCA</i>
	Please delete paragraphs (b) and (c) as the content of these paragraphs seems to be of no regulatory use. Such coordination will be established depending on the project.	
	Pleas move to the definitions and complete with lights and markers. Visual aids include lights, markings and markers.	
response	Accepted	The GM has been deleted and moved to definitions.

comment	1340	comment by: <i>Euroairport Bâle-Mulhouse</i>
	Attachment #210	
	Aéroport Bâle – Mulhouse NPA 2011-20 (B.II)GM-ADR-OPS.B.065	
	Référence Visual	: GM-ADR-OPS.B.065 aids

	Traduction de courtoisie This provision must appear in definitions.
response	Accepted The GM has been deleted and moved to definitions.
comment	1632 comment by: <i>Geneva International Airport (ROMIG)</i> This article should be moved to the definitions section. This is a definition, not GM.
response	Accepted The GM has been deleted and moved to definitions.
comment	1753 comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i> move to definitions
response	Accepted The GM has been deleted and moved to definitions.
comment	1756 comment by: <i>Aéroport de Marseille - MRS/LFML</i> This provision must appear in definitions
response	Accepted The GM has been deleted and moved to definitions.
comment	1778 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i> Move to definitions
response	Accepted The GM has been deleted and moved to definitions.
comment	1815 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i> Attachment #211 UAF NPA 2011-20 (B.II) GM-ADR-OPS.B.065 Référence : GM-ADR-OPS.B.065 Visual aids Traduction de courtoisie This provision must appear in definitions.
response	Accepted

The GM has been deleted and moved to definitions.

comment 1877 comment by: *Pau Pyrénées Airport - PUF/LFBP*
This provision must appear in definitions.

response Accepted
The GM has been deleted and moved to definitions.

comment 2007 comment by: *Munich Airport International*
move to definitions
Justification: should not be GM

response Accepted
The GM has been deleted and moved to definitions.

comment 2022 comment by: *Airport St. Gallen-Altenrhein - ACH/LSZR*
complete with lights and markers and move to the definitions

response Accepted
The GM has been deleted and moved to definitions.

comment 2342 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence : GM-ADR- OPS.B.065	Visual aids
Proposition/commentaire	Cette disposition doit plutôt figurer dans les définitions.
Justification	
Traduction de courtoisie	This provision must appear in definitions.

response Accepted
The GM has been deleted and moved to definitions.

comment 2574 comment by: *ADV -German Airports Association*
GM.ADR.OPS.B.065
move to definitions
Justification
should not be GM

response Accepted
The GM has been deleted and moved to definitions.

comment	2672	comment by: <i>Fraport AG</i>
	GM-ADR-OPS.B.065 — Visual aids	
	Editorial	
	Complete paragraph	
	Should be a definition	
	Fraport	AG
	Visual Aid has to be defined and not only explained	
response	Noted	

<p>NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS — SUBPART B — AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) — AMC1-ADR-OPS.B.070 — Aerodrome works safety</p>	p. 162-163
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comment	1854	comment by: <i>Airport Nuremberg - NUE/EDDN</i>
	(b) This should be specified in greater detail and limited to the movement area or the aerodrome operations. Not all construction or maintenance work is necessarily "planned, established, implemented or approved by the aerodrome operator". Taking the rented or leased areas within the terminal or office area, constructional work does neither have to be approved by the aerodrome operator, nor is it of relevance to safety.	
response	Accepted	
	Point (b) has been revised to include the proposal.	

comment	2155	comment by: <i>Danish Transport Authority</i>
	GM on aerodrome works on the sides or end of runway and sides of taxiways should be implemented, either by referring to ICAO Doc 9137, part 6, chapter 3 or transferring the content from the ICAO Doc and modify it according the NPA. NPA procedure regarding changes without prior approval by the competent authority should include the possibility of aerodrome works (ADR.AR.C.035 (g)).	
response	Noted	
	The Agency considers that not all aerodrome works need prior approval by the competent authority. GM will be provided at a later stage.	

<p>NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS — SUBPART B — AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) — AMC2-ADR-OPS.B.070 — Runway pavement overlays</p>	p. 163
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comment	145	comment by: CAA-NL
	In (c) we suggest to add 'the location of any temporary threshold should be identified by a 3.6 meter wide transverse stripe' because the indication of a transverse stripe at the location of a temporary threshold on a runway being overlaid is essential and a minimum requirement besides the runway centre line marking.	
response	Accepted Text revised accordingly.	

comment	839 ❖	comment by: DGAC Direction Générale de l'aviation civile
	1. Affected paragraphs <ul style="list-style-type: none">• ANNEX II — Part-OR — ADR.OR.B.040 — Changes (p41-42)• Annex I – Part AR – ADR-AR.C.040 (a) – Changes (p26)• AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.D.005 (b)(4) — Management - safety assessment for risk management (p74-87)• AMC/GM to ANNEX II — Part-OPS –AMC2-ADR-OPS-B.070 — Runway pavement overlays (p163)• AMC/GM to ANNEX II — Part-OPS – AMC3-ADR-OPS.B.070 — Marking and lighting of Unserviceable areas (p163)• AMC/GM to ANNEX II — Part-OPS – AMC-ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects (p173)• AMC/GM to ANNEX II — Part-OPS – AMC-ADR-OPS.C.015 — Visual Aids and Electrical Systems (p176)	
	2. Justification and proposed text / comment <p>This comment is linked with comment 1087 in book I. Referencing to the Certification specifications in Book I and Book II is not relevant because CS are referring to essential requirements and are applicable only through the certification basis of the aerodrome which includes: the CS applicable to the given aerodrome, and ELOS and SC where appropriate. This is already taken into account in AMC1-ADR.AR.C.035(f) — Issuance of certificate – paragraph (b) – page 29 : "<i>prescribed in the certification specifications included in the certification basis of the aerodrome</i>" DGAC thus proposes to adopt the same writing in the following modifications for the provisions of Book I and II that refer to CS, and add the amendment of the certification basis, following a change implying new CS which are applicable, in ADR-AR.C.040 (a) :</p> <p>ADR-AR.C.040 (a) – Changes "(a) [...] (4) <i>the corresponding amended certification basis, if relevant.</i> [...]"</p> <p>GM1-ADR.OR.D.005 (b)(4) — Management "SAFETY ASSESSMENT FOR RISK MANAGEMENT ... (d) <i>Necessity for conducting a safety assessment</i> (1) <i>A safety assessment is carried out for all safety concerns, including; identified safety hazards, deviations from requirements or certification</i></p>	

specifications or certification basis or and identified change or for any other items or circumstances where such an assessment is considered a contribution to safety assurance. A safety assessment is an everyday process at an aerodrome with a functioning management system. It may be applied in different scale depending on the safety concern to be assessed. The list below is not exhaustive but identifies some of the main reasons for a safety assessment to be applied.
..."

AMC2-ADR-OPS-B.070 - Runway pavement overlays

"The aerodrome operator should ensure that:

- (a) When a runway is to be returned temporarily to an operational status before resurfacing is complete, the temporary ramp should comply with the applicable specifications included in the aerodrome certification basis of the aerodrome CSs;
- (b) Before a runway being overlaid is returned to a temporary operational status, a runway centre line marking conforming to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs should be provided;
- (c) The location of any temporary threshold should conform to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC3-ADR-OPS.B.070 — Marking and lighting of Unserviceable areas

Note: the word "shall" is inappropriately used in this AMC and is to be replaced by "should".

"(a) The aerodrome operator should ensure that:

- (1) Unserviceability markers are displayed whenever any portion of a taxiway, apron or holding bay is unfit for the movement of aircraft but it is still possible for aircraft to bypass the area safely;
 - (2) On a movement area used at night, unserviceability lights should be used;
 - (3) Unserviceability markers and lights are placed at intervals sufficiently close so as to delineate the unserviceable area.
- (b) Unserviceability markers shall should consist of conspicuous upstanding devices such as flags, cones or marker boards;
- (c) Unserviceability markers and lights should meet the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC-ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects

"...

- (c) When flags are used to mark mobile objects, they should comply with the applicable specifications included in the aerodrome certification basis of the aerodrome CSs;

..."

AMC-ADR-OPS.C.015 — Visual Aids and Electrical Systems

Note: the word "shall" is inappropriately used in this AMC, in paragraph (a), and is to be replaced by "should".

- (a) The aerodrome operator should establish a system of corrective and preventive maintenance which ensures that a light is deemed unserviceable when the main beam average intensity is less than 50 % of the value specified in the applicable specifications included in the

aerodrome certification basis of the aerodrome CSs. For light units where the designed main beam average intensity is above the specified in the applicable specifications included in the aerodrome certification basis of the aerodrome CSs, the 50 % value shall should be related to that design value;
..."

response

Partially accepted

The comments on AMC2 – ADR.OPS.B.070 are partially agreed. Not all the CSs are included in the certification basis of the aerodrome. For those that are normally included there, the proposed wording is accepted. For those specifications which are of temporary nature, and are not normally included in the certification basis either a reference to the CSs is made, or the details are included in the AMC.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC3-ADR-OPS.B.070 – Marking and lighting of Unserviceable areas

p. 163

comment

146

comment by: CAA-NL

We suggest to add the light characteristics of red fixed lights of 10 cd, according to ICAO 7.4.4.

response

Accepted

Point (c) has been revised, and a reference is made to the CS where light characteristics are described.

comment

516

comment by: Icelandic Civil Aviation Administration

AMC3-ADR-OPS.B.070 (a)(1) - Spelling, the word "got" should be "for" in line 2.

response

Accepted

comment

839 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX II – Part-OR – ADR.OR.B.040 – Changes (p41-42)
- Annex I – Part AR – ADR-AR.C.040 (a) – Changes (p26)
- AMC/GM to ANNEX II – Part-OR – GM1-ADR.OR.D.005 (b)(4) – Management - safety assessment for risk management (p74-87)
- AMC/GM to ANNEX II – Part-OPS – AMC2-ADR-OPS-B.070 – Runway pavement overlays (p163)
- AMC/GM to ANNEX II – Part-OPS – AMC3-ADR-OPS.B.070 – Marking and lighting of Unserviceable areas (p163)
- AMC/GM to ANNEX II – Part-OPS – AMC-ADR-OPS.B.080 – Marking and lighting of vehicles and other mobile objects (p173)
- AMC/GM to ANNEX II – Part-OPS – AMC-ADR-OPS.C.015 – Visual

Aids and Electrical Systems (p176)

2. Justification and proposed text / comment

This comment is linked with comment 1087 in book I.

Referencing to the Certification specifications in Book I and Book II is not relevant because CS are referring to essential requirements and are applicable only through the certification basis of the aerodrome which includes: the CS applicable to the given aerodrome, and ELOS and SC where appropriate.

This is already taken into account in AMC1-ADR.AR.C.035(f) — Issuance of certificate – paragraph (b) – page 29 : *"prescribed in the certification specifications included in the certification basis of the aerodrome"*

DGAC thus proposes to adopt the same writing in the following modifications for the provisions of Book I and II that refer to CS, and add the amendment of the certification basis, following a change implying new CS which are applicable, in ADR-AR.C.040 (a) :

ADR-AR.C.040 (a) – Changes

"(a) [...]

(4) *the corresponding amended certification basis, if relevant.*

[...]"

GM1-ADR.OR.D.005 (b)(4) – Management

"SAFETY ASSESSMENT FOR RISK MANAGEMENT

...

(d) Necessity for conducting a safety assessment

(1) A safety assessment is carried out for all safety concerns, including; identified safety hazards, deviations from requirements or certification specifications or certification basis or and identified change or for any other items or circumstances where such an assessment is considered a contribution to safety assurance. A safety assessment is an everyday process at an aerodrome with a functioning management system. It may be applied in different scale depending on the safety concern to be assessed. The list below is not exhaustive but identifies some of the main reasons for a safety assessment to be applied.

..."

AMC2-ADR-OPS-B.070 - Runway pavement overlays

"The aerodrome operator should ensure that:

(a) When a runway is to be returned temporarily to an operational status before resurfacing is complete, the temporary ramp should comply with the applicable specifications included in the aerodrome certification basis of the aerodrome CSs;

(b) Before a runway being overlaid is returned to a temporary operational status, a runway centre line marking conforming to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs should be provided;

(c) The location of any temporary threshold should conform to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC3-ADR-OPS.B.070 – Marking and lighting of Unserviceable areas

Note: the word "shall" is inappropriately used in this AMC and is to be replaced by "should".

"(a) *The aerodrome operator should ensure that:*

(1) Unserviceability markers are displayed whenever any portion of a taxiway, apron or holding bay is unfit for the movement of aircraft but it is still possible for aircraft to bypass the area safely;
(2) On a movement area used at night, unserviceability lights should be used;
(3) Unserviceability markers and lights are placed at intervals sufficiently close so as to delineate the unserviceable area.
(b) Unserviceability markers ~~shall~~ **should** consist of conspicuous upstanding devices such as flags, cones or marker boards;
(c) Unserviceability markers and lights should meet the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC-ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects

"...
(c) When flags are used to mark mobile objects, they should comply with the applicable specifications included in the aerodrome certification basis of the aerodrome CSs;
..."

AMC-ADR-OPS.C.015 — Visual Aids and Electrical Systems

Note: the word "shall" is inappropriately used in this AMC, in paragraph (a), and is to be replaced by "should".

"(a) The aerodrome operator should establish a system of corrective and preventive maintenance which ensures that a light is deemed unserviceable when the main beam average intensity is less than 50 % of the value specified in the applicable specifications included in the aerodrome certification basis of the aerodrome CSs. For light units where the designed main beam average intensity is above the specified in the applicable specifications included in the aerodrome certification basis of the aerodrome CSs, the 50 % value ~~shall~~ **should** be related to that design value;
..."

response Not accepted

The comments on AMC3-ADR.OPS.B.070 are not agreed. The Certification Specifications of unserviceability lights and markers are not normally included in the certification basis of the aerodrome. For that reason, direct reference to the applicable CSs is required.

NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS — SUBPART B — AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) — GM1-ADR-OPS.B.070 — Routine Maintenance works p. 163

comment

225

comment by: KLM

Add:

Any work taking place at an aerodrome should **be coordinated with the aircraft operators** in order to minimize impact on the operations.

response

Noted

It is impracticable to coordinate with aircraft operators any work taking place at the aerodrome.

comment 271 comment by: *CAA Norway*
We suggest to remove the word "routine" from GM1-ADR-OPS.B.070 (a) and (c) on page 163, and also from the headline. Why routine? Isn't it also rather important if this is non-routine work and none routine personnel? Usually airport staff is doing the routine maintenance.

response Accepted
Text revised accordingly.

comment 457 comment by: *Estonian CAA*
"We suggest to remove the word "routine" from GM1-ADR-OPS.B.070 (a) and (c) on page 163, and also from the headline. Why routine? Isn't it also rather important if this is non-routine work and none routine personnel? Usually airport staff is doing the routine maintenance. "

response Accepted
Text revised accordingly.

comment 517 comment by: *Icelandic Civil Aviation Administration*
We suggest to remove the word "routine" from GM1-ADR-OPS.B.070 (a) and (c) on page 163, and also from the headline. Why routine? Isn't it also rather important if this is non-routine work and none routine personnel? Usually airport staff is doing the routine maintenance.

response Accepted
Text revised accordingly.

comment 853 comment by: *Finnish Transport Safety Agency*
We suggest to remove the word "routine" from GM1-ADR-OPS.B.070 (a) and (c) on page 163, and also from the headline. Why routine? Isn't it also rather important if this is non-routine work and none routine personnel? Usually airport staff is doing the routine maintenance.

response Accepted
Text revised accordingly.

comment 1045 comment by: *Finavia*
Paragraph (a) to be removed. Any person entering movement area must have an ID card and driving permit which includes the rights to move and

	work on restricted areas. No need for an extra written permit and extra bureaucracy.
response	Not accepted The aerodrome operator should be aware of any maintenance works taking place at the movement area, for safety reasons. Holding an ID card and a driving permit only doesn't necessarily authorise a person to perform maintenance activities.
comment	1209 comment by: <i>Federal Office of Civil Aviation FOCA</i> The ANS provider does not have any competence or interests in that field., solely the aerodrome operator is responsible. Please change parag. (a) and (c) to: [...] in coordination with the competent authority and other relevant authorities.
response	Noted Comment is not clear.
comment	1491 comment by: <i>Swedish Transport Agency</i> We suggest to remove the word "routine" from GM1-ADR-OPS.B.070 (a) and (c) on page 163, and also from the headline. Why routine? Isn't it also rather important if this is non-routine work and none routine personnel? Usually airport staff is doing the routine maintenance.
response	Accepted Text revised accordingly.
comment	2156 comment by: <i>Danish Transport Authority</i> The GM should be revised so the content is consistent with the NPA. Written approval to enter the movement area doesn't meet the AMC regarding operations of vehicles inside the movement area. Need to define if its unattended driving or driving with escort.
response	Noted The written approval refers to the execution of maintenance works and not entering the movement area.
comment	2157 comment by: <i>Danish Transport Authority</i> Definition of routine maintenance, "minor" and "major" aerodrome works would be desirable in the GM.
response	Noted

AND INSTALLATIONS (ADR.OPS.B) – GM2-ADR-OPS.B.070 – Minor construction/maintenance work

comment	226	comment by: <i>KLM</i>
	Add: Any work taking place at an aerodrome should be coordinated with the aircraft operators in order to minimize impact on the operations.	
response	Noted It is impracticable to coordinate with aircraft operators any work taking place at the aerodrome.	
comment	1493	comment by: <i>Swedish Transport Agency</i>
	Replace air traffic control with air traffic services to include AFIS. This might be applicable also elsewhere.	
response	Accepted Text revised.	
comment	1983	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
	<u>1. Affected paragraphs</u> <ul style="list-style-type: none">• AMC/GM- Book II – GM2-ADR.OPS.B.070 – Minor construction / maintenance work (p163-164)	
	<u>2. Justification and proposed text / comment</u> The French system has no work permit on aerodromes. A GM can not specify the system to be in place in the State. It is consequently proposed to modify sub paragraphs (a) and (c) of GM2-ADR.OPS.B.070 – Minor construction / maintenance work as follows :	
	GM2-ADR.OPS.B.070 – Minor construction / maintenance work “(a) A system of work permits is necessary can be used for minor works on the movement area; [...] (c) The objectives of the work permits or the points to deal with within procedures related to works are: [...]”	
response	Noted It is impracticable to coordinate with aircraft operators any work taking place at the aerodrome.	
comment	2091	comment by: <i>IATA</i>
	GM2-ADR-OPS.B.070 – Minor construction/maintenance work	

response	<p>Add: Any work taking place at an aerodrome should be coordinated with the aircraft operators in order to minimize impact on the operations</p>
response	<p>Noted</p> <p>It is impracticable to coordinate with aircraft operators any work taking place at the aerodrome.</p>
comment	<p>2514 comment by: <i>AEA - Association of European Airlines</i></p> <p>GM2-ADR-OPS.B.070 – Minor construction/maintenance work</p> <p>Comments</p> <p>Add: Any work taking place at an aerodrome should be coordinated with the aircraft operators in order to minimize impact on the operations.</p>
response	<p>Noted</p> <p>It is impracticable to coordinate with aircraft operators any work taking place at the aerodrome.</p>

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM3-ADR-OPS.B.070 – Major construction/maintenance work</p>	<p>p. 164-165</p>
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comment	<p>227 comment by: <i>KLM</i></p> <p>Add:</p> <p>Here the aircraft operators have to be added as such works will have impact on the regularity and efficiency of operations and the impact has to be minimized in coordination with the airlines and not only with the aerodrome and ATC and the contractor.</p>
response	<p>Noted</p> <p>It is impracticable to coordinate with aircraft operators any work taking place at the aerodrome. This can be done through aerodrome safety committees, Local Runway Safety Team, etc.</p>
comment	<p>518 comment by: <i>Icelandic Civil Aviation Administration</i></p> <p>GM3-ADR-OPS.B.070 – Major construction/maintenance work (g) - Safety training is necessary, pls insert.</p>
response	<p>Partially accepted</p> <p>Text revised but not as proposed.</p>
comment	<p>1398 comment by: <i>UK CAA</i></p>

	<p>Page No: 165</p> <p>Paragraph No: GM3-ADR-OPS.B.070 item (i)</p> <p>Comment: The emphasis is placed on the contractor's activities when the focus should be on aerodrome safety.</p> <p>Justification: Safety and operational management approach.</p> <p>Proposed Text: (i): Where aircraft are constantly using areas open to contractors, inspections at frequent intervals are required to ensure the continuing operational safety of the aerodrome;</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2092 comment by: IATA</p> <p>GM3-ADR-OPS.B.070 — Major construction/maintenance work</p> <p>Add:</p> <p>Here the aircraft operators have to be added as such works will have impact on the regularity and efficiency of operations and the impact has to be minimized in coordination with the airlines and not only with the aerodrome and ATC and the contractor.</p>
response	<p>Noted</p> <p>It is impracticable to coordinate with aircraft operators any work taking place at the aerodrome. This can be done through aerodrome safety committees, Local Runway Safety Team, etc.</p>
comment	<p>2203 comment by: Flughafen Klagenfurt</p> <p>(a) and (b) change surroundings to vicinity</p>
response	<p>Not accepted</p> <p>The word 'surroundings' is coming from the Basic Regulation.</p>
comment	<p>2480 comment by: Isavia</p> <p>GM3-ADR-OPS.B.070 — Major construction/maintenance works (g) - Safety training is necessary,</p>
response	<p>Partially accepted</p> <p>Text revised but not as proposed.</p>
comment	<p>2515 comment by: AEA - Association of European Airlines</p> <p>GM3-ADR-OPS.B.070 — Major construction/maintenance work</p> <p>Before the commencement of any substantial work on the movement area liaison group comprising representatives from the Aerodrome Operator,</p>

	Air Traffic Control and subcontractors' agents may be established;
	Comments Add: Here the aircraft operators have to be added as such works will have impact on the regularity and efficiency of operations and the impact has to be minimized in coordination with the airlines and not only with the aerodrome and ATC and the contractor.
response	Noted It is impracticable to coordinate with aircraft operators any work taking place at the aerodrome. This can be done through aerodrome safety committees, Local Runway Safety Team, etc.

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes</p>	p. 165-166
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comment	38 comment by: <i>ACI EUROPE - Airports Council International</i> replace "surroundings" by "vicinity" Justification: consistency
response	Not accepted The term "surroundings" is used in the BR instead of 'vicinity'.

comment	147 comment by: <i>CAA-NL</i> There are no criteria for obstacle induced turbulence and the interference of communication, navigation and surveillance systems to conduct a safety assessment. In the Netherlands we use the criterion of 7 knots for the speed deficit due to a wind disturbing structure along the aircraft track and the criterion of 6 knots for the speed deficit across the aircraft track. These may be added to the proposals as AMC. For criteria for the interference of communication, navigation and surveillance systems we suggest to refer to ICAO EUR Doc 015, European guidance material on managing building restricted areas, second edition 2009.
response	Noted

comment	192 comment by: <i>SWISS AERODROMES ASSOCIATION</i> The word "surroundings" has to be replaced by "vicinity" to remain consistent with ICAO and the task of the aerodrome ist to be limited within its competence.
response	Not accepted The term 'surrounding' is used in the BR instead of 'vicinity'

The level of responsibility of the aerodrome operator is included in the IR.

comment 367 comment by: *Avinor*

AMC1.ADR.OPS.B 075 (a) (b). Replace "surroundings" by "vicinity". This regulations should not be in GM.

response Not accepted

The term 'surrounding' is used in the BR instead of 'vicinity'.
These regulations are at AMC level.

comment 564 comment by: *Flughafen Düsseldorf GmbH*

"Surrounding" sollte durch "vicinity" ersetzt werden.

response Not accepted

The term 'surroundings' is used in the BR instead of 'vicinity'.

comment 574 comment by: *Vienna International Airport*

(a) and (b) change surroundings to vicinity

response Not accepted

The term 'surrounding' is used in the BR instead of 'vicinity'.

comment 823 comment by: *Dublin Airport Authority*

Ref (a)

Suggest replacement of "surroundings" with "vicinity" in order to promote consistency.

response Not accepted

The term 'surrounding' is used in the BR instead of 'vicinity'.

comment 985 comment by: *Cologne/Bonn Airport*

(a)(b): replace surroundings by "vicinity"

response Not accepted

The term 'surrounding' is used in the BR instead of 'vicinity'.

comment 1015 ❖ comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs
Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that

- extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- ADR.AR.C.075 — Protection of communication, navigation

and surveillance systems

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

- (a) establish protection areas for each aeronautical communications, navigation and surveillance system;
- (b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

*(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."*

- Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

*(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:*

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with*

at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

~~(3) hazards related to human activities and land use in order to take action as appropriate.~~

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;
(3) the dazzling caused by large and highly reflective surfaces;
(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;
(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

~~Note: these provisions are already dealt with in:~~

- ~~· CS-ADR-DSN.B.165 — Objects on runway strips (p18),~~
- ~~· CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),~~
- ~~· CS-ADR-DSN.J.475 — Non-precision approach runways (p45),~~
- ~~· CS-ADR-DSN.J.480 — Precision approach runways (p46),~~
- ~~· CS-ADR-DSN.J.485 — Runways meant for take-off (p47),~~
- ~~· CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).~~

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).~~

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).~~

response

Partially accepted

Concerning the comments on AMC1 – ADR.OPS.B.075, the Agency has the

following views:
The comment on point (a) is agreed, and text revised as proposed.
The comment to delete point (d) is not agreed since it is a requirement by the BR.

comment 1190 comment by: *Salzburger Flughafen GmbH*
(a) and (b) change surroundings to vicinity

response Not accepted
The term 'surrounding' is used in the BR instead of 'vicinity'.

comment 1211 comment by: *Federal Office of Civil Aviation FOCA*
p- 166-169: The structure of this article is poor and should thought over.
Non-instrument runways criteria are missing. Many requirements are repeated. Table 1 is also applicable for other runway types.

response Noted

comment 1498 comment by: *Flughafen Graz Betriebs GmbH*
(a) and (b) change surroundings to vicinity

response Not accepted
The term 'surrounding' is used in the BR instead of 'vicinity'.

comment 1549 comment by: *Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH*
(a) and (b) change surroundings to vicinity

response Not accepted
The term 'surrounding' is used in the BR instead of 'vicinity'.

comment 1634 comment by: *Geneva International Airport (ROMIG)*
Replace "surroundings" by "vincinity"
Consistency with other articles.

response Not accepted
The term 'surrounding' is used in the BR instead of 'vicinity'.

comment 1638 comment by: *Assaeroporti - Associazione Italiana Gestori Aeroporti*

(a) and (b): to be consistent with previous comments and proposed amendments, we suggest to replace "surroundings" by "vicinity".

We also suggest to specify that "The aerodrome operator should have procedures to monitor the changes [...] **within the limits of its**

	competencies".
response	<p>Noted</p> <p>The comment to replace 'surroundings' with 'vicinity' is not agreed since the word 'surrounding' is used throughout the BR. Point (a) of this AMC has been revised in order to give more clarity.</p>
comment	<p>1652 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i></p> <p>(a) and (b) change surroundings to vicinity</p>
response	<p>Not accepted</p> <p>The term 'surrounding' is used in the BR instead of 'vicinity'.</p>
comment	<p>1857 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>The monitoring, risk assessment and evaluation of obstacles and land use in the surrounding of the aerodrome cannot be in response of the aerodrome operator, because there are neither physical nor legal means of enforcement. This should exclusively be in the response of the competent authority. Monitoring the surrounding of an aerodrome as well would lead to a massive amount of additional cost and required personal resources on the side of the airports.</p>
response	<p>Noted</p> <p>This is a requirement coming from Article 8a.4 of the BR. The aerodrome operator is also responsible within its competence to take mitigating measures when activities and developments may cause unacceptable risks to aviation.</p>
comment	<p>1975 comment by: <i>Turin Airport - TRN/LIMF</i></p> <p>(a) and (b): to be consistent with previous comments and proposed amendments, we suggest to replace "surroundings" by "vicinity".</p> <p>We also suggest to specify that "The aerodrome operator should have procedures to monitor the changes [...] within the limits of its competencies".</p>
response	<p>Noted</p> <p>The comment to replace 'surroundings' with 'vicinity' is not agreed since the word 'surrounding' is used throughout the BR. Point (a) of this AMC has been revised in order to give more clarity.</p>
comment	<p>2008 comment by: <i>Munich Airport International</i></p> <p>(a)(b)</p> <p>replace "surroundings" by "vincinity"</p>

	Justification: consistency
response	<p>Not accepted</p> <p>The term 'surrounding' is used in the BR instead of 'vicinity'.</p>
comment	<p>2048 comment by: AENA - Aeropuertos Españoles y Navegación Aérea</p> <p><i>The explanation is in ADR-OPS.B.075 — Safeguarding of aerodromes</i></p> <p>It is proposed:</p> <p><i>"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.</i></p> <p><i>(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.</i></p> <p><i>(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.</i></p> <p><i>(d) The risks caused by human activities and land use which should be assessed and mitigated should include:</i></p> <p><i>(1) obstacles and the possibility of induced turbulence;</i></p> <p><i>(2) the use of hazardous, confusing and misleading lights;</i></p> <p><i>(3) the dazzling caused by large and highly reflective surfaces;</i></p> <p><i>(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;</i></p> <p><i>(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."</i></p>
response	<p>Noted</p> <p>Comment for (a) is agreed and text revised accordingly. Comment to delete (d) is not agreed since it is a requirement by the BR.</p>
comment	<p>2482 comment by: Isavia</p> <p>AMC1.ADR.OPS.B 075 (a) (b). Replace "surroundings" by "vicinity". This regulations should not be in GM</p>
response	<p>Noted</p> <p>The term 'surrounding' is used in the BR instead of 'vicinity'. These regulations are at AMC level.</p>

comment	2495	comment by: <i>DAA Cork Airport</i>
	(a) Suggest replacement of "surroundings" with "vicinity" in order to promote consistency.	
response	Not accepted The term 'surrounding' is used in the BR instead of 'vicinity'.	
comment	2575	comment by: <i>ADV -German Airports Association</i>
	AMC1.ADR.OPS.B075	(a) (b)
	replace "surroundings" by "vicinity"	
	Justification consistency	
response	<u>Not accepted</u> The term 'surrounding' is used in the BR instead of 'vicinity'.	
comment	2673	comment by: <i>Fraport AG</i>
	AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (a), (b) and (c)	
	Editorial	
	(a) ... on the aerodrome and its surroundings . The scope, ...	
	(b) The limits of the aerodrome surroundings that should ...	
	(c) ... the aerodrome and its surroundings identified...	
	Proposed Text	
	(a) ... on the aerodrome and its vicinity . The scope, ...	
	(b) The limits of the aerodrome vicinity that should ...	
	(c) ... the aerodrome and its vicinity identified ...	
	Fraport	AG
	To be consistent with other paragraphs	
response	Not accepted The term 'surrounding' is used in the BR instead of 'vicinity'.	

<p>NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS — SUBPART B — AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) — AMC2-ADR-OPS.B.075 — Obstacle restriction and removal</p>	p. 166-169
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comment	39	comment by: <i>ACI EUROPE - Airports Council International</i>
	Table 1, code F should be 55m	
	Justification: inconsistent with CS.ADR.DSN.D.260	

response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 148 comment by: CAA-NL
In Table 1 we suggest to change Code F into 55 meters to be consistent with CS-ADR-DSN.D260.

response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 175 comment by: Swedavia AB - Swedish airports (currently 11 airports)
(3) (i) (a) Table 1, code F should be 55m, inconsistent with CS.ADR.DSN.D.260.

response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 303 comment by: CAA Austria - Ministry of Transport
(a) (1) (ii) (C) Change to: within 45m of the runway centre line of a precision approach runway category I, II or Iii where the code number is 1 or 2
Article (a) (1) (ii) does not cover category II or III runways where the code number is 1 or 2
(Table 1), code F should be 55m
Inconsistent with CS.ADR.DSN.D.260

response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 368 comment by: Avinor
AMC2.ADR.OPS.B.075 (3) (i) (A). Table 1, code F should be 55m.

response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 510 comment by: Beat Kisseleff, private
3 (ii) (A) (b)
(NEW) 105 m of the runway centre line where the code number is 4 and operations of code letter F aeroplanes take place.
Justification: 75 m would be degrading for the existing ICAO recommendation!

response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment	741	comment by: ADP : Aeroports de Paris
	Référence : AMC2-ADR-OPS.B.075	Obstacle restriction and removal
	Proposition/commentaire	(a) (1) (ii) Il convient de reprendre le texte de la lettre aux Etats n°41 de l'OACI qui prend en considération les objets utiles à la sécurité des aéronefs de la même manière que les aides visuelles nécessaires à la navigation aérienne. (3) (i) Table 1: Ce tableau est en contradiction avec la CS correspondante notamment pour le Code F (55m et non pas 57,5m). Par ailleurs, il est souhaitable de reprendre pour le Code F les chiffres découlant des différentes études relatives aux déviations sur voies de circulation et de la circulaire 305 de l'OACI (ce qui donnerait 51 m).
	Justification	
	Traduction de courtoisie	(a) (1) (ii) It is appropriate to take the ICAO Letter to States n° 41 that takes into account the objects necessary to aircraft safety and the visual aids necessary to air navigation. (3) (i) Table 1: This table is in contradiction with the corresponding CS notably for Code F (55m instead of 57,5m). Moreover, it is necessary for Code F to take the figures that ensue from the different studies about deviations on taxiways and about the ICAO circular 305 (which would be 51 m).

response *Accepted*
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 988 comment by: Cologne/Bonn Airport
3 (i) (A): Table 1, Code F should be 55 m

response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment	<p>990 comment by: <i>Union des Aéroports français - UAF</i></p> <p>Attachment #212</p> <p>UAF NPA 2011-20 (B.II) AMC2-ADR-OPS.B.075</p> <p>Référence : AMC2-ADR-OPS.B.075 Obstacle restriction and removal</p> <p>Traduction de courtoisie (a) (1) (ii) It is appropriate to take the ICAO Letter to States n° 41 that takes into account the objects necessary to aircraft safety and the visual aids necessary to air navigation. (3) (i) Table 1: This table is in contradiction with the corresponding CS notably for Code F (55m instead of 57,5m). Moreover, it is necessary for Code F to take the figures that ensue from the different studies about deviations on taxiways and about the ICAO circular 305 (which would be 51 m).</p>
response	<p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>

comment	<p>1015 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <p><u>Cover regulation</u></p> <ul style="list-style-type: none">• Draft Commission Regulation - Article 8 – Obstacles - Objects (p14) <p><u>Annexes to the cover regulation</u></p> <ul style="list-style-type: none">• ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)• ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)• ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)• ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)• Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68) <p><u>AMC/GM to the IR</u></p> <ul style="list-style-type: none">• AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)• AMC-GM to Annex I - AMC1-ADR.AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)• AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles – Elevation datum (p39)• AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)• AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)• AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)• AMC-GM to Annex I - AMC3-ADR.AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
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- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR.AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done “without prejudice to the system and legal provisions of the Member State”. This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- **Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-**

Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 – Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- ADR.AR.C.075 – Protection of communication, navigation and surveillance systems

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- ADR.AR.C.080 – Other activities

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State,

without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.
[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by

DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.

2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "*the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner*". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for

mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(d) The risks caused by human activities and land use which should be assessed and mitigated should include:

(1) obstacles and the possibility of induced turbulence;

(2) the use of hazardous, confusing and misleading lights;

(3) the dazzling caused by large and highly reflective surfaces;

(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;

(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."

~~AMC2-ADR-OPS.B.075 – Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 – Objects on runway strips (p18),*
- CS-ADR-DSN.B.170 – Non-precision approach and non-instrument runway strips (p19),*
- CS-ADR-DSN.J.475 – Non-precision approach runways (p45),*
- CS-ADR-DSN.J.480 – Precision approach runways (p46),*
- CS-ADR-DSN.J.485 – Runways meant for take-off (p47),*
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)*

~~AMC3-ADR-OPS.B.075 – Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).

~~AMC4-ADR-OPS.B.075 – Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 – Objects to be marked and/or lighted (p146-147).

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Accepted

AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1217

comment by: *Federal Office of Civil Aviation FOCA*

Change para. (a) (1) (ii) (C) to "within 45 m of the runway centre line of a precision approach runway category I, II or Iii where the code number is 1 or 2". Para. (a) (1) (ii) does not cover category II or III runways where the code number is 1 or 2.

The whole para. (a) (3) covers precision approach runways, thus this term does not need to be repeated in every article.

Match para. (a) (3) (ii) and (a) (3) (v) into one paragraph.

response

Accepted

AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1380

comment by: *Euroairport Bâle-Mulhouse*

Attachment [#213](#)

Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC2-ADR-OPS.B.075

Référence : AMC2-ADR-OPS.B.075
Obstacle restriction and removal

Traduction de courtoisie
(a) (1) (ii) It is appropriate to take the ICAO Letter to States n° 41 that takes into account the objects necessary to aircraft safety and the visual

aids necessary to air navigation.
(3) (i) Table 1: This table is in contradiction with the corresponding CS notably for Code F (55m instead of 57,5m). Moreover, it is necessary for Code F to take the figures that ensue from the different studies about deviations on taxiways and about the ICAO circular 305 (which would be 51 m).

response

Accepted

AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1400

comment by: UK CAA

Page No: 167

Paragraph No: AMC2-ADR-OPS.B.075 item (2)(i)

Comment: Uses the word "appropriate" authority instead of "competent" authority as stated elsewhere.

Justification: The term competent should be used to maintain consistency throughout the document.

Proposed Text: Replace "appropriate" with "competent"

response

Accepted

AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1578

comment by: ECA - European Cockpit Association

Amend paragraph as follows:

(a)(4)(ii) **For existing runways,** if no object reaches the 2 % (1:50) take-off climb surface, new objects should be limited to preserve the existing obstacle free surface or a surface down to a slope of ~~1.6%~~ **1 per cent (1:100).**

Justification:

Self-explanatory: there is a need to reduce the probability of a collision with an obstacle.

Reference: IFALPA Annex 14, paragraph 4.2.26.

response

Accepted

AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1635

comment by: Geneva International Airport (ROMIG)

Table 1, code F should be 55m
Inconsistent with CS.ADR.DSN.D.260

response

Accepted

AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 1733 comment by: *Aéroport de Marseille - MRS/LFML*

(a) (1) (ii) It is appropriate to take the ICAO Letter to States n° 41 that takes into account the objects necessary to aircraft safety and the visual aids necessary to air navigation.

(3) (i) Table 1: This table is in contradiction with the corresponding CS notably for Code F (55m instead of 57,5m).
 Moreover, it is necessary for Code F to take the figures that ensue from the different studies about deviations on taxiways and about the ICAO circular 305 (which would be 51 m).

response Accepted

AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 1779 comment by: *ENAC Ente Nazionale per l'Aviazione Civile*

If maintained as a standalone point, change (a)(1)(iii) as follows: " No mobile object shall be permitted on the part of the runway strip defined in (a)(1)(ii) during the use of the runway for landing or take-off".

(3) (i) (A):
 Table 1, code F should be 55m to be consistent with CS.ADR.DSN.D.260

response Accepted

AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 1793 comment by: *Aéroport Nantes Atlantique - NTE/LFRS*

Attachment [#214](#)

UAF	NPA	2011-20	(B.II)	AMC2-ADR-OPS.B.075
Référence		:		AMC2-ADR-OPS.B.075
Obstacle		restriction	and	removal

Traduction de courtoisie

(a) (1) (ii) It is appropriate to take the ICAO Letter to States n° 41 that takes into account the objects necessary to aircraft safety and the visual aids necessary to air navigation.

(3) (i) Table 1: This table is in contradiction with the corresponding CS notably for Code F (55m instead of 57,5m).
 Moreover, it is necessary for Code F to take the figures that ensue from the different studies about deviations on taxiways and about the ICAO circular 305 (which would be 51 m).

response Accepted

AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 1847 comment by: *AIRBUS*

Table 1 contains, for code F, a "Taxiway, other than aircraft stand taxilane, centreline to objects (m)" value of 57.5m. This value should be changed to 55m to be consistent with CS-ADR-DSN.D.260 Table D-1.

	Taxiway minimum separation distances.
response	<p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>
comment	<p>1859 comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #215</p> <p>ADBM - NPA 2011-20 (B.II) AMC2-ADR-OPS.B.075</p> <p>Référence : AMC2-ADR-OPS.B.075 Obstacle restriction and removal</p> <p>Traduction de courtoisie (a) (1) (ii) It is appropriate to take the ICAO Letter to States n° 41 that takes into account the objects necessary to aircraft safety and the visual aids necessary to air navigation. (3) (i) Table 1: This table is in contradiction with the corresponding CS notably for Code F (55m instead of 57,5m). Moreover, it is necessary for Code F to take the figures that ensue from the different studies about deviations on taxiways and about the ICAO circular 305 (which would be 51 m).</p>
response	<p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>
comment	<p>1864 comment by: <i>Airport Nuremberg - NUE/EDDN</i></p> <p>Implementing ICAO recommendations as an AMC in the area of obstacles places an immense burden on the aerodromes. Already today there are a lot of aerodromes already dealing with the matter of obstacles and having difficulties fulfilling the ICAO standards on that topic. By implementing the ICAO recommendations as well, it makes it for these airports almost impossible to even reach the required needs, which eventually puts a much higher pressure on the airports. In addition this regulation will lead to more conflicts within the aerodrome environment and surrounding area, since in many cases we are talking about trees and woods standing under national or european environmental protection! Having to remove those opstacles will lead to further effort, costs and an increase in personell resources, where the additional increase in safety is more than doubtful! ICAO recommendations in the field of obstacles should therefore be moved to Guidance Material!</p>
response	<p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>
comment	<p>1875 comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>(3) (i) Table 1: This table is in contradiction with the corresponding CS notably for Code F (55m instead of 57,5m). Moreover, it is necessary for Code F to take the figures that ensue from</p>

response	<p>the different studies about deviations on taxiways and about the ICAO circular 305 (which would be 51 m).</p> <p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>
comment	<p>2009 <i>comment by: Munich Airport International</i></p> <p>(3)(i)(A)</p> <p>Table 1, code F should be 55m</p> <p>Justification: inconsistent with CS.ADR.DSN.D.260</p>
response	<p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>
comment	<p>2015 <i>comment by: Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Change article (a) (1) (ii) (C) to: within 45 m of the runway centre line of a precision approach runway category I, II or Iii where the code number is 1 or 2</p>
response	<p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>
comment	<p>2016 <i>comment by: Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>code F should be 55m (Table 1)</p>
response	<p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>
comment	<p>2017 <i>comment by: Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Replace the word "object" with "obstacle", this article concerns obstacles.</p>
response	<p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>
comment	<p>2018 <i>comment by: Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>This article is poorly organised and poorly structured. It will be very difficult to use in its present form. Recommend re-writing.</p>
response	<p>Accepted</p> <p>AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.</p>
comment	<p>2019 <i>comment by: Airport St. Gallen-Altenrhein - ACH/LSZR</i></p>

	use "surroundings" instead of "vicinity" for consistency
response	Accepted AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment	2049 comment by: <i>AENA - Aeropuertos Españoles y Navegación Aérea</i>
	The aerodrome operator has not authority to restrict or remove obstacles outside the aerodrome. Therefore it is proposed to eliminate every paragraph that establish that the aerodrome operator have to restrict or move obstacles outside the aerodrome.
response	Accepted AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment	2245 comment by: <i>Brussels Airport</i>
	AMC2-ADR-OPS.B.075 table 1 & AMC3-ADR-OPS.B.075 table 1 The dimension of code letter F does not correspond with CS.ADR.DSN.D.260 Table D-1. It should be 55m in all tables
response	Accepted AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment	2323 comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i>								
	<table border="1"> <tr> <td>Référence : AMC2-ADR-OPS.B.075</td> <td>Obstacle restriction and removal</td> </tr> <tr> <td>Proposition/commentaire</td> <td>(a) (1) (ii) Il convient de reprendre le texte de la lettre aux Etats n°41 de l'OACI qui prend en considération les objets utiles à la sécurité des aéronefs de la même manière que les aides visuelles nécessaires à la navigation aérienne. (3) (i) Table 1: Ce tableau est en contradiction avec la CS correspondante notamment pour le Code F (55m et non pas 57,5m). Par ailleurs, il est souhaitable de reprendre pour le Code F les chiffres découlant des différentes études relatives aux déviations sur voies de circulation et de la circulaire 305 de l'OACI (ce qui donnerait 51 m).</td> </tr> <tr> <td>Justification</td> <td></td> </tr> <tr> <td>Traduction de courtoisie</td> <td>(a) (1) (ii) It is appropriate to take the</td> </tr> </table>	Référence : AMC2-ADR-OPS.B.075	Obstacle restriction and removal	Proposition/commentaire	(a) (1) (ii) Il convient de reprendre le texte de la lettre aux Etats n°41 de l'OACI qui prend en considération les objets utiles à la sécurité des aéronefs de la même manière que les aides visuelles nécessaires à la navigation aérienne. (3) (i) Table 1: Ce tableau est en contradiction avec la CS correspondante notamment pour le Code F (55m et non pas 57,5m). Par ailleurs, il est souhaitable de reprendre pour le Code F les chiffres découlant des différentes études relatives aux déviations sur voies de circulation et de la circulaire 305 de l'OACI (ce qui donnerait 51 m).	Justification		Traduction de courtoisie	(a) (1) (ii) It is appropriate to take the
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Proposition/commentaire	(a) (1) (ii) Il convient de reprendre le texte de la lettre aux Etats n°41 de l'OACI qui prend en considération les objets utiles à la sécurité des aéronefs de la même manière que les aides visuelles nécessaires à la navigation aérienne. (3) (i) Table 1: Ce tableau est en contradiction avec la CS correspondante notamment pour le Code F (55m et non pas 57,5m). Par ailleurs, il est souhaitable de reprendre pour le Code F les chiffres découlant des différentes études relatives aux déviations sur voies de circulation et de la circulaire 305 de l'OACI (ce qui donnerait 51 m).								
Justification									
Traduction de courtoisie	(a) (1) (ii) It is appropriate to take the								

	<p>ICAO Letter to States n° 41 that takes into account the objects necessary to aircraft safety and the visual aids necessary to air navigation.</p> <p>(3) (i) Table 1: This table is in contradiction with the corresponding CS notably for Code F (55m instead of 57,5m). Moreover, it is necessary for Code F to take the figures that ensue from the different studies about deviations on taxiways and about the ICAO circular 305 (which would be 51 m).</p>
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response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 2576 comment by: *ADV -German Airports Association*
AMC2.ADR.OPS.B.075 (3) (i) (A)
Table 1, code F should be 55m
Justification
inconsistent with CS.ADR.DSN.D.260

response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 2674 comment by: *Fraport AG*
AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (3) (i) (A) Table 1
Editorial
Table 1, code F is **57,5 m**
Proposed Text
Table 1, code F should be **55 m**
Fraport AG
To be consistent with CS-ADR.DSN.D.260

response Accepted
AMC2-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

Marking and lighting of obstacles

comment 40 comment by: *ACI EUROPE - Airports Council International*
Table 1, code F should be 55m
Justification: inconsistent with CS.ADR.DSN.D.260

response Accepted
AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 149 comment by: *CAA-NL*
In Table 1 we suggest to change Code F into 55 meters to be consistent with CS-ADR-DSN.D260.

response Accepted
AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 176 comment by: *Swedavia AB - Swedish airports (currently 11 airports)*
(d) Table 1, code F should be 55m, inconsistent with CS.ADR.DSN.D.260.

response Accepted
AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 304 comment by: *CAA Austria - Ministry of Transport*
Table 1, code F should be 55m
Inconsistent with CS.ADR.DSN.D.260

response Accepted
AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 369 comment by: *Avinor*
AMC3.ADR.OPS.075 (d). Table 1, code F should be 55m. Inconsistent with CS.ADR.DSN.D.260.

response Accepted
AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 992 comment by: *Cologne/Bonn Airport*
Table 1, Code F should be 55m; inconsistent with CS.ADR.DSN.D. 260

response Accepted
AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)

- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State,

without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

*(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."*

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions

related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in

coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

~~Note: these provisions are already dealt with in:~~

- ~~· CS-ADR-DSN.B.165 — Objects on runway strips (p18),~~
- ~~· CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),~~
- ~~· CS-ADR-DSN.J.475 — Non-precision approach runways (p45),~~
- ~~· CS-ADR-DSN.J.480 — Precision approach runways (p46),~~
- ~~· CS-ADR-DSN.J.485 — Runways meant for take-off (p47),~~
- ~~· CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb surface (p170-171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).~~

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).~~

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 – Lighting of objects (p150).

response

Accepted

AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1637

comment by: *Geneva International Airport (ROMIG)*

Table 1, code F should be 55m
Inconsistent with CS.ADR.DSN.D.260

response

Accepted

AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1780

comment by: *ENAC Ente Nazionale per l'Aviazione Civile*

(d):
Table 1, code F should be 55m to be consistent with CS.ADR.DSN.D.260

response

Accepted

AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1847 ❖

comment by: *AIRBUS*

Table 1 contains, for code F, a "Taxiway, other than aircraft stand taxilane, centreline to objects (m)" value of 57.5m. This value should be changed to 55m to be consistent with CS-ADR-DSN.D.260 Table D-1. Taxiway minimum separation distances.

response

Accepted

AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

2010

comment by: *Munich Airport International*

(d)

Table 1, code F should be 55m

Justification: inconsistent with CS.ADR.DSN.D.260

response

Accepted

AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

2243

comment by: *Brussels Airport*

AMC-ADR-OPS.B.035

To delete (c)

Aerodrome operator can only use the commercially available chemicals

response Accepted
Refer to similar comments in the respective AMC.

comment 2577 comment by: *ADV -German Airports Association*
AMC3.ADR.OPS.075 (d)
Table 1, code F should be 55m
Justification
inconsistent with CS.ADR.DSN.D.260

response Accepted
AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 2675 comment by: *Fraport AG*
AMC3-ADR-OPS.075 – Marking and lighting of obstacles (d) (5) Table 1
Editorial
Table 1, code F is **57,5 m**
Proposed Text
Table 1, code F should be **55 m**
Fraport AG
To be consistent with CS-ADR.DSN.D.260

response Accepted
AMC3-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – AMC4-ADR-OPS.B.075 – Obstacles** p. 170
that extends above a take-off climb surface

comment 1015 ❖ comment by: *DGAC Direction Générale de l'aviation civile*
1. Affected paragraphs
Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR-AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)

- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of

obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 – Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 – Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- ADR.AR.C.075 – Protection of communication, navigation and surveillance systems

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.
[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the

*Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:
[...]"*

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "*the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner*". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of

certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

“(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome.”

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

“(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(d) The risks caused by human activities and land use which should be assessed and mitigated should include:

(1) obstacles and the possibility of induced turbulence;

(2) the use of hazardous, confusing and misleading lights;

(3) the dazzling caused by large and highly reflective surfaces;

(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;

(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger.”

AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-

~~169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC8 ADR OPS.B.075 — Marking of objects (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response Accepted

AMC4 - ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

**NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS —
SUBPART B — AERODROME OPERATIONAL SERVICES, EQUIPMENT
AND INSTALLATIONS (ADR.OPS.B) — AMC5-ADR-OPS.B.075 —
Objects, other than obstacles, adjacent to a take-off climb surface**

p. 170-171

comment 1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting

- of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
 - AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
 - AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
 - AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
 - AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
 - AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

- (a) establish protection areas for each aeronautical communications, navigation and surveillance system;
- (b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements

stated in Section B.1(b) of Annex Va, which specifies that "the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(d) The risks caused by human activities and land use which should be

~~assessed and mitigated should include:~~

- ~~(1) obstacles and the possibility of induced turbulence;~~
- ~~(2) the use of hazardous, confusing and misleading lights;~~
- ~~(3) the dazzling caused by large and highly reflective surfaces;~~
- ~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~
- ~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

~~Note: these provisions are already dealt with in:~~

- ~~· CS-ADR-DSN.B.165 — Objects on runway strips (p18),~~
- ~~· CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),~~
- ~~· CS-ADR-DSN.J.475 — Non-precision approach runways (p45),~~
- ~~· CS-ADR-DSN.J.480 — Precision approach runways (p46),~~
- ~~· CS-ADR-DSN.J.485 — Runways meant for take-off (p47),~~
- ~~· CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)~~

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).~~

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).~~

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).~~

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

~~Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).~~

response Accepted
AMC5 - ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 1582 comment by: *ECA - European Cockpit Association*
Delete the paragraph and replace with the following:
Where take-off ceiling and visibility minima are specified for a runway, critical obstacles should be marked and, if the runway is used at night, lighted, except where it can be shown that the obstacle is not a hazard to safe operation.
Justification:
Reference: IFALPA Annex 14, paragraph 6.1.2

response Accepted
AMC5 - ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 2172 comment by: *ECA - European Cockpit Association*
Delete the paragraph and replace with the following:
Where take-off ceiling and visibility minima are specified for a runway, critical obstacles should be marked and, if the runway is used at night, lighted, except where it can be shown that the obstacle is not a hazard to safe operation.
Justification:
Self-explanatory: there is a need to reduce the probability of a collision with an obstacle.
Reference: IFALPA Annex 14, paragraph 6.1.2

response Accepted
AMC5 - ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – AMC6-ADR-OPS.B.075 – Obstacles** p. 171
that extends above an approach or transitional surface

comment 1015 ❖ comment by: *DGAC Direction Générale de l'aviation civile*
1. Affected paragraphs
Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 — Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 — confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 — Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 — Other activities (p31)
- Annex III - ADR-OPS.B.075 — Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles - Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects -precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects -runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects - other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects - obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects - wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)

- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- ADR.AR.C.075 — Protection of communication, navigation and surveillance systems

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TŒURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

*(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."*

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

*(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."*

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing,**

misleading and hazardous lights

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

*(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:*

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner"*. Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated

with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(d) The risks caused by human activities and land use which should be assessed and mitigated should include:

(1) obstacles and the possibility of induced turbulence;

(2) the use of hazardous, confusing and misleading lights;

(3) the dazzling caused by large and highly reflective surfaces;

(4) sources of non visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~**AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)**~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~**AMC3-ADR-OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC4-ADR-OPS.B.075 — Obstacles that extends above a take off climb surface (p170)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8-ADR-OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response Accepted

AMC6-ADR-OPS.B.075 has been deleted. Refer to the relevant CSs.

**INSTALLATIONS (ADR.OPS.B) – AMC7-ADR-OPS.B.075 – Fixed
obstacles above a horizontal surface**

comment 1015 ❖ comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- Annex III - ADR-OPS.B.075 – Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 – Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) – Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) – Obstacles – Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) – Obstacles – Objects – non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) – Obstacles – Objects –precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) – Obstacles – Objects –runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) – Obstacles – Objects – other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) – Obstacles – Objects – obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) –Obstacles – Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) – Obstacles – Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) – Obstacles – Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) – confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) – Confusing, misleading and hazardous lights (p52)

- AMC-GM to Annex I - AMC1-ADR.AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- ADR.AR.C.070 — Confusing, misleading and hazardous lights REV

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety

or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) *The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above.*"

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) *Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above.*"

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) *The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:*

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article

8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks

associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC8 ADR OPS.B.075 — Marking of objects (p172)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 – Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 – Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 – Lighting of objects (p150).

response

Accepted

AMC7-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment

1401

comment by: UK CAA

Page No: 171

Paragraph No: AMC7.ADR.OPS.B.075(a)(2)

Comment: (a) (2) Only refers to 'circuit' but there are other types of operations possible.

Proposed Text: (a) (2): " for a circuit **or flight path** extensively obstructed by immovable objects or terrain, procedures have been established to ensure safe vertical clearance below prescribed flight paths; or"

response

Accepted

AMC7-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – AMC8-ADR-OPS.B.075 – Marking of objects p. 172

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- Annex III - ADR-OPS.B.075 – Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p38)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 — Obstacles (a) - Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles - Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(a) — Obstacles — Objects - non precision approach runways (p39-40)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065(a) — Obstacles — Objects -precision approach runways (p40)
- AMC-GM to Annex I - AMC3-ADR-AR.C.065(a) — Obstacles — Objects -runways meant for take-off (p40)
- AMC-GM to Annex I - AMC4-ADR-AR.C.065(a) — Obstacles — Objects - other objects (p41)
- AMC-GM to Annex I - AMC5-ADR-AR.C.065(a) — Obstacles — Objects - obstacle protection surface for visual approach slope indicator systems (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065 (b);(c) — Obstacles — Objects (p41)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) —Obstacles — Objects - (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) — Obstacles — Objects (p43)
- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects - wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done "without prejudice to the system and legal provisions of the Member State". This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- **Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 – Obstacles-Objects**

"(a) The competent authority or other authorities of the Member State shall:

[...]

(2) not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;

(3) not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.

- **ADR.AR.C.070 – Confusing, misleading and hazardous lights REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the

vicinity of an aerodrome are identified and mitigated.”

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065 (b) – Obstacles - Objects**

“WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind turbine rotor should not shield lights on intermediate levels.

[...]”

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above.”

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

“LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above.”

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

“LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]”

(B) The control of surroundings is dealt with through two tiers:
- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.
Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that "*the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner*". Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

(d) The risks caused by human activities and land use which should be assessed and mitigated should include:

(1) obstacles and the possibility of induced turbulence;

(2) the use of hazardous, confusing and misleading lights;

(3) the dazzling caused by large and highly reflective surfaces;

(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;

(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."

AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),*
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),*

- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~**AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC4 ADR OPS.B.075 — Obstacles that extends above a take off climb surface (p170)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7 ADR OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8 ADR OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9 ADR OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response Noted
AMC8-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 1212 comment by: Federal Office of Civil Aviation FOCA
The term "object" should be replaced by "obstacle". There is only a need to mark obstacles. Objects laying below a OLS are not to be marked.

response Noted
AMC8-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

comment 2614 comment by: Airport Nuremberg - NUE/EDDN
Second AMC8-ADR-OPS.B.075 should be changed to AMC9-ADR-OPS.B.075

response

Noted

AMC8-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B
– AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) – AMC9-ADR-OPS.B.075 – Location of
obstacle lights**

p. 172

comment

1015 ❖

comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

Cover regulation

- Draft Commission Regulation - Article 8 – Obstacles - Objects (p14)

Annexes to the cover regulation

- ANNEX I - Part-AR - ADR.AR.C.065 – Obstacles-Objects (p30)
- ANNEX I - Part-AR - ADR.AR.C.070 – confusing, misleading and hazardous lights (p30)
- ANNEX I - Part-AR - ADR.AR.C.075 – Protection of communication, navigation and surveillance systems (p30-31)
- ANNEX I - Part-AR - ADR.AR.C.080 – Other activities (p31)
- Annex III - ADR-OPS.B.075 – Safeguarding of aerodromes (68)

AMC/GM to the IR

- AMC-GM to Annex I - GM1-ADR-AR.C.065 (b);(c) – Obstacles – Objects (p38)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065 – Obstacles (a) – Outer Horizontal Surface (p39)
- AMC-GM to Annex I - AMC2-ADR.AR.C.065(a) – Obstacles – Elevation datum (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) – Obstacles – Objects – Non instrument runways (p39)
- AMC-GM to Annex I - AMC1-ADR.AR.C.065(a) – Obstacles – Objects – non precision approach runways (p39-40)
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- AMC-GM to Annex I - AMC4-ADR.AR.C.065(a) – Obstacles – Objects – other objects (p41)
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- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b);(c) –Obstacles – Objects – (p42-43)
- AMC-GM to Annex I - AMC1-ADR-AR.C.065(b) – Obstacles – Objects (p43)

- AMC-GM to Annex I - AMC2-ADR-AR.C.065 (b) — Obstacles — Objects – wind turbines (p51)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(a) — confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC2-ADR-AR.C.070(a) — Confusing, misleading and hazardous lights (p52)
- AMC-GM to Annex I - AMC1-ADR-AR.C.070(b) — Confusing, misleading and hazardous lights (p53)
- AMC-GM to Annex III - AMC1-ADR-OPS.B.075 — Safeguarding of aerodromes (p165-166)
- AMC-GM to Annex III - AMC2-ADR-OPS.B.075 — Obstacle restriction and removal (p166-169)
- AMC-GM to Annex III - AMC3-ADR-OPS.075 — Marking and lighting of obstacles (p169-170)
- AMC-GM to Annex III - AMC4-ADR-OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)
- AMC-GM to Annex III - AMC5-ADR-OPS.B.075 — Objects, other than obstacles, adjacent to a take-off climb Surface (p170-171)
- AMC-GM to Annex III - AMC6-ADR-OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)
- AMC-GM to Annex III - AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)
- AMC-GM to Annex III - AMC8-ADR-OPS.B.075 — Marking of objects (p172)
- AMC-GM to Annex III - AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)

2. Justification and proposed text / comment

This comment is linked with comment 1248 in book I.

(A) The safeguarding of aerodromes is at the limit between the civil aviation competency and the land use planning competency which both may be shared with local authorities with varying splits according to the States. It is then essential to provide enough flexibility so that the Member State can establish a mechanism to manage the surroundings of the aerodrome that can fit its system and legal provisions.

This can be done by referring to other authorities of the Member State instead of the competent authority, and by indicating that the control of obstacles is done “without prejudice to the system and legal provisions of the Member State”. This is a critical point for DGAC.

Note: in addition to that, OLS may expand in more than one State (Basle, Geneva, Fontarabie) and the legal context may be utterly complex.

Thus the need to modify the wording of the following provisions:

- Paragraphs (a)(2) and (a)(3) of ADR.AR.C.065 — Obstacles-Objects

“(a) The competent authority *or other authorities of the Member State shall:*

[...]

(2) *not permit new objects or extensions to existing objects, remove objects or otherwise protect the surfaces and areas established in accordance with (a)(1), as appropriate, without prejudice to the system and legal provisions of the Member State;*

(3) *not permit developments which may endanger safety due to obstacle-induced turbulence, without prejudice to the system and legal provisions of the Member State.*

- **ADR.AR.C.070 – Confusing, misleading and hazardous lights
REV**

"(a) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that sources of light or dazzle that may confuse air navigation, endanger safety or adversely affect the operation of an aerodrome are extinguished, screened, or modified, or are subject to any other action required in the interest of safety.

(b) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall establish protective zones around aerodromes to protect the safety of aircraft against the hazardous effects of laser emitters."

- **ADR.AR.C.075 – Protection of communication, navigation and surveillance systems**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall:

(a) establish protection areas for each aeronautical communications, navigation and surveillance system;

(b) not permit, or shall modify or otherwise mitigate sources of non-visible radiation or the presence of moving or fixed objects that may interfere with, or adversely affect, the performance of the systems mentioned in subparagraph (a)."

- **ADR.AR.C.080 – Other activities**

"The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, shall ensure that potential hazards to safety and the use of the aerodrome associated with proposed developments, activities or changes in the land use in the vicinity of an aerodrome are identified and mitigated."

- **Paragraphs (c)(3), (c)(4)(i) and (d) of AMC2-ADR-AR.C.065
(b) – Obstacles - Objects**

"WIND TØURBINES

[...] (c) Lighting – day use [...]

(3) Where the highest point of the blade on the vertical position exceeds 150 m above ground level, high-intensity white lights should be prescribed by the competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, if medium intensity lights are deemed insufficient.

(4) Obstacle lights should be installed on the nacelle in such a manner as to provide an unobstructed view for aircraft approaching them from any direction.

(i) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels.

(ii)[...]

(d) Lighting – night use

(1) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe medium-intensity flashing red lights instead of white lights. [...]

(2) The competent authority or other authorities of the Member State, without prejudice to its system and legal provisions, should prescribe additional intermediate lighting levels if it is deemed necessary; these lights should be low-intensity fixed red lights Type A or Type B. The wind

turbine rotor should not shield lights on intermediate levels.
[...]"

- **Paragraph (b) of AMC1-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS THAT MAY ENDANGER THE SAFETY OF AIRCRAFT

[...]

(b) The competent authority should have as appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, in order to achieve (a) above."

- **Paragraph (b) of AMC2-ADR.AR.C.070(a) – Confusing, misleading and hazardous lights**

"LIGHTS WHICH MAY CAUSE CONFUSION

[...]

(b) Arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, as appropriate, to achieve (a) above."

- **Paragraph (a) of AMC1-ADR.AR.C.070 (b) – Confusing, misleading and hazardous lights**

"LASER EMISSIONS WHICH MAY ENDANGER SAFETY

(a) The competent authority should ensure that the following protected zones are established and implemented around an aerodrome and that appropriate arrangements with other **competent** authorities of the Member State, without prejudice to its system and legal provisions, are in place, in order to protect the safety of aircraft against the hazardous effects of laser emitters:

[...]"

(B) The control of surroundings is dealt with through two tiers:

- the aerodrome operator's monitoring, within the limit of its responsibilities, and through its notified certification basis and
- the Member States' mechanisms established for such purpose.

Consequently, the following principles are to be pursued in the proposed implementing rules and proposed certification specifications:

1. The requirements for the authority in part AR should take into account the fact that the control of obstacles is strongly linked to the land use planning laws, thus all that can be expected from the Member State is the establishment of a mechanism to safeguard the surroundings of the aerodromes. This is done case by case for each aerodrome, so it is essential to provide enough flexibility in these rules to allow necessary arrangements to fit to each aerodrome environment and context. The logic understood by DGAC is that authorities establish surfaces relying on what is notified in the certification basis of the aerodrome, but with some adaptations for instance to take into account future developments of the aerodrome.
2. The requirements for the aerodrome operator on that subject should be in the book of certification specifications only, and should not be duplicated in the part OPS. Moreover, it is essential that these requirements take into account the fact that outside the boundaries of the aerodrome, the aerodrome operator has absolutely no legal power to control obstacles. All that can be expected from the aerodrome operator outside its boundaries is the

establishment of OLS, which the aerodrome operator should propose to the competent authority in accordance with AMC1-ADR.OR.B.015(b)(1);(2);(3), and their oversight within its line of sight.

The first principle leads to review the part AR corresponding to the article 8 of the cover regulation, in particular ADR-AR.C.065 and corresponding AMCs and GMs. Comments for each provision have been done in the specific DGAC's comments.

The second principle leads to delete from the part OPS all the provisions related to the monitoring of the surroundings and related to the limitation and marking and/or lighting of obstacles.

Indeed, AMC/GM Part OPS should only reflect the Essential Requirements stated in Section B.1(b) of Annex Va, which specifies that *"the aerodrome operator shall verify that the requirements of Section A are complied with at all times or take appropriate measures to mitigate the risks associated with non-compliance. Procedures shall be established and applied to make all users aware of such measures in a timely manner"*. Thus the rules stated by Part OPS need only to impose the fact that the aerodrome operator shall have procedures in place for mitigating the risks associated with obstacles and other activities within the monitored areas that could impact safety.

DGAC proposes the following modifications of ADR-OPS.B.075 and AMC1-ADR-OPS.B.075, and to delete the all other corresponding AMCs and GMs, given the fact that all of them are already dealt with in the book of certification specifications.

Note: it is proposed to delete (a)(3) of ADR-OPS.B.075 because already covered by paragraph (b) and confusing given the fact that the aerodrome has no legal power on the areas outside its boundaries.

ADR-OPS.B.075 – Safeguarding of aerodromes

"(a) The aerodrome operator shall have procedures to monitor on the aerodrome and surroundings within the areas defined in coordination with the competent authority:

(1) obstacle limitation surface and protection surfaces of navigation aids as established in accordance with the Certification Basis of the aerodrome in order to take appropriate action to mitigate the risk associated with regard to their penetration of by obstacle limitation surfaces or other safeguarding surfaces;

(2) marking and lighting of obstacles in accordance with the Certification Basis of the aerodrome in order to be able to take action as appropriate;

(3) hazards related to human activities and land use in order to take action as appropriate.

(b) The aerodrome operator shall have procedures in place, without prejudice to the system and legal provisions of the member State, for mitigating the risks associated with obstacles, developments and other activities within the monitored areas that could impact safe operations of aircraft operating at, to or from the aerodrome."

AMC1-ADR-OPS.B.075 – Safeguarding of aerodromes (p165-166)

"(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting and in human activities or land use on the aerodrome and its surroundings areas defined in coordination with the competent authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant ANS providers and with the competent authority and other

relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the competent authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant ANS providers and with the competent authority and other relevant authorities.

~~(d) The risks caused by human activities and land use which should be assessed and mitigated should include:~~

~~(1) obstacles and the possibility of induced turbulence;~~

~~(2) the use of hazardous, confusing and misleading lights;~~

~~(3) the dazzling caused by large and highly reflective surfaces;~~

~~(4) sources of non-visible radiation or the presence of moving or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems;~~

~~(5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened or otherwise modified so as to eliminate the source of danger."~~

~~AMC2 ADR OPS.B.075 — Obstacle restriction and removal (p166-169)~~

Note: these provisions are already dealt with in:

- CS-ADR-DSN.B.165 — Objects on runway strips (p18),
- CS-ADR-DSN.B.170 — Non-precision approach and non-instrument runway strips (p19),
- CS-ADR-DSN.J.475 — Non-precision approach runways (p45),
- CS-ADR-DSN.J.480 — Precision approach runways (p46),
- CS-ADR-DSN.J.485 — Runways meant for take-off (p47),
- CS-ADR-DSN.T.915 - Siting of equipment and installations on operational areas (p167)

~~AMC3 ADR OPS.B.075 — Marking and lighting of obstacles (p169-170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC4 ADR OPS.B.075 — Obstacles that extends above a take-off climb surface (p170)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC5 ADR OPS.B.075 — Objects, other than obstacles, adjacent to a take off climb Surface (p170-171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~AMC6 ADR OPS.B.075 — Obstacles that extends above an approach or transitional Surface (p171)~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146).

~~**AMC7-ADR-OPS.B.075 — Fixed obstacles above a horizontal surface (p171)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.840 — Objects to be marked and/or lighted (p146-147).

~~**AMC8-ADR-OPS.B.075 — Marking of objects (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.845 — Marking of objects (p147).

~~**AMC9-ADR-OPS.B.075 — Location of obstacle lights (p172)**~~

Note: these provisions are already dealt with in CS-ADR-DSN.Q.850 — Lighting of objects (p150).

response

Accepted

AMC9-ADR.OPS.B.075 has been deleted. Refer to the relevant CSs.

**NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS — SUBPART B
— AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) — AMC-ADR-OPS.B.080 — Marking and
lighting of vehicles and other mobile objects** p. 173

comment

41

comment by: *ACI EUROPE - Airports Council International*

(b) change to "red or yellowish green"

Justification: to be consistent with ICAO definition; most emergency vehicles in Europe have these colours!

response

Accepted

Text revised accordingly.

comment

150

comment by: *CAA-NL*

We suggest to change 'green' into 'red or yellowish green' according to ICAO Annex 14 6.2.6.

response

Accepted

Text revised accordingly.

comment

177

comment by: *Swedavia AB - Swedish airports (currently 11 airports)*

Under (b) "when mobile objects are marked by colour, a single conspicuous colour, preferably green for emergency vehicles and yellow for service vehicles, should be used". Suggest another phrasing omitting the specification of colour, using the phrase "a colour that is contrasting to the environment" instead.

response

Not accepted

The Agency has followed ICAO Annex 14 6.2.6 Recommendation.

comment	272	comment by: <i>CAA Norway</i>
	We suggest to delete the advice for specific colours in AMC-ADR-OPS.B.080 (b) on page 173. "When mobile objects are marked by colour, a single conspicuous colour should be used;"	
response	Not accepted The Agency has followed ICAO Annex 14 6.2.6 Recommendation.	
comment	314	comment by: <i>Danish Transport Authority</i>
	The preferred colours for emergency vehicles shall also include the colour red and yellowish green according to ICAO Annex 14, Volume I.	
response	Accepted Text revised accordingly.	
comment	370	comment by: <i>Avinor</i>
	AMC.ADR.OPS.B.080 (b). When mobile objects are marked by color, a single conspicuous color, preferably red (RAL 3000) or yellowish green (RAL 1016) for emergency vehicles and yellow for service vehicles, should be used. Inconsistent with CS.ADR.DSN.D.26	
response	Accepted The Agency has followed ICAO Annex 14 6.2.6 Recommendation.	
comment	458	comment by: <i>Estonian CAA</i>
	We suggest to delete the advice for specific colours in AMC-ADR-OPS.B.080 (b) on page 173. "When mobile objects are marked by colour, a single conspicuous colour should be used;"	
response	Not accepted The Agency has followed ICAO Annex 14 6.2.6 Recommendation.	
comment	519	comment by: <i>Icelandic Civil Aviation Administration</i>
	We suggest to delete the advice for specific colours in AMC-ADR-OPS.B.080 (b) on page 173. "When mobile objects are marked by colour, a single conspicuous colour, should be used;"	
response	Not accepted The Agency has followed ICAO Annex 14 6.2.6 Recommendation.	
comment	528	comment by: <i>CTIF The International Fire and Rescue Organization -</i>

	<i>Airport Commission</i>
	Fire vehicles are red or yellow in most countries. It has to be: Fire vehicle could be red, yellow or green.
response	Partially accepted The Agency has followed ICAO Annex 14 6.2.6 Recommendation.
comment	575 comment by: <i>Vienna International Airport</i> (b) change "green" to "red" (d) delete (e) delete
response	Noted The comment to (b) is agreed while the comments to delete (d) and (e) have not been agreed, since they are ICAO Standards.
comment	600 comment by: <i>Brussels Airport - BRU/EBBR</i> AMC-ADR-OPS.B.080(b) & (CS-ADR-DSN.Q.845) & GM-ADR-DSN.Q.845(d) The text to be lined up with Annex 14. The words 'red or yellowish' were omitted. In NPA 2011-20 B.II AMC-ADR-OPS.B.080(b) "Marking and lighting of vehicles and other mobile objects" it says : 'When mobile objects are marked by colour, a single conspicuous colour, preferably <u>green</u> for emergency vehicles and yellow for service vehicles should be used'. The corresponding Annex 14 recommendation 6.2.6 says : "preferably red or yellowish green". In the Certification Specifications (CS-ADR-DSN.Q.845 - Marking of Objects) nothing is mentioned about the colour of mobile obstacles. But there is in the corresponding Guidance Material : GM-ADR-DSN.Q.845 - Marking of objects (d) : "A single colour, preferably red or yellowish green for emergency vehicles and yellow for service vehicles, is generally used." Here the words red or yellowish are not forgotten, but the word 'conspicuous' is omitted here. Suggested text for AMC-ADR-OPS.B.080(b) and also for GM-ADR-DSN.Q.845(d) : "A single <u>conspicuous</u> colour, preferably <u>red or yellowish green</u> for emergency vehicles and yellow for service vehicles, is generally used."
response	Accepted Concerning the comment on the AMC, it is agreed and the text has been revised accordingly.

comment	602	comment by: <i>Flughafen Duesseldorf GmbH</i>
	(b) The colour for emergency vehicles should be changed from green to red.	
response	Accepted Text revised accordingly.	

comment	739	comment by: <i>ADP : Aeroports de Paris</i>								
	<table border="1"> <tr> <td>Référence : AMC-ADR-OPS.B.080</td> <td>Marking and lighting of vehicles and other mobile objects</td> </tr> <tr> <td>Proposition/commentaire</td> <td>(b) Il convient de transférer en GM ce point (b) et de le modifier de la manière suivante: "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;"</td> </tr> <tr> <td>Justification</td> <td>La couleur des véhicules d'urgence est de préférence rouge ce qui permet de respecter la recommandation 6.2.6 de l'Annexe 14 de l'OACI et de bien différencier les véhicules d'urgence des véhicules de service. Par ailleurs, les couleurs de véhicules d'urgence sont imposées par des textes qui sortent du cadre de la sécurité aéroportuaire. Ce qui mène à opter pour le déplacement de ce point en GM.</td> </tr> <tr> <td>Traduction de courtoisie</td> <td>It is appropriate to transfer the (b) to GM and to modify it in the following way : "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;" The colour of emergency vehicles is preferably red which permits to be compliant with the recommendation 6.2.6 of the ICAO Annex 14 and to differentiate emergency vehicles from service vehicles. Besides, the colours of emergency vehicles are imposed by rules that are out of the scope of airport safety. That leads to opt for the transfer of this point to GM.</td> </tr> </table>		Référence : AMC-ADR-OPS.B.080	Marking and lighting of vehicles and other mobile objects	Proposition/commentaire	(b) Il convient de transférer en GM ce point (b) et de le modifier de la manière suivante: "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;"	Justification	La couleur des véhicules d'urgence est de préférence rouge ce qui permet de respecter la recommandation 6.2.6 de l'Annexe 14 de l'OACI et de bien différencier les véhicules d'urgence des véhicules de service. Par ailleurs, les couleurs de véhicules d'urgence sont imposées par des textes qui sortent du cadre de la sécurité aéroportuaire. Ce qui mène à opter pour le déplacement de ce point en GM.	Traduction de courtoisie	It is appropriate to transfer the (b) to GM and to modify it in the following way : "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;" The colour of emergency vehicles is preferably red which permits to be compliant with the recommendation 6.2.6 of the ICAO Annex 14 and to differentiate emergency vehicles from service vehicles. Besides, the colours of emergency vehicles are imposed by rules that are out of the scope of airport safety. That leads to opt for the transfer of this point to GM.
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response	Noted									

The Agency has followed ICAO Annex 14 6.2.6 Recommendation.

comment	825 Ref (b) Change to: "Red or Yellowish Green" to be consistent with ICAO definitions, majority of emergency fleet vehicles across Europe would bear these markings already.	comment by: <i>Dublin Airport Authority</i>
response	Accepted Text revised accordingly.	

comment	839 ❖ <u>1. Affected paragraphs</u> <ul style="list-style-type: none">• ANNEX II — Part-OR — ADR.OR.B.040 — Changes (p41-42)• Annex I – Part AR – ADR-AR.C.040 (a) – Changes (p26)• AMC/GM to ANNEX II — Part-OR — GM1-ADR.OR.D.005 (b)(4) — Management - safety assessment for risk management (p74-87)• AMC/GM to ANNEX II — Part-OPS –AMC2-ADR-OPS-B.070 — Runway pavement overlays (p163)• AMC/GM to ANNEX II — Part-OPS – AMC3-ADR-OPS.B.070 — Marking and lighting of Unserviceable areas (p163)• AMC/GM to ANNEX II — Part-OPS – AMC-ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects (p173)• AMC/GM to ANNEX II — Part-OPS – AMC-ADR-OPS.C.015 — Visual Aids and Electrical Systems (p176) <u>2. Justification and proposed text / comment</u> <p>This comment is linked with comment 1087 in book I. Referencing to the Certification specifications in Book I and Book II is not relevant because CS are referring to essential requirements and are applicable only through the certification basis of the aerodrome which includes: the CS applicable to the given aerodrome, and ELOS and SC where appropriate. This is already taken into account in AMC1-ADR.AR.C.035(f) — Issuance of certificate – paragraph (b) – page 29 : "<i>prescribed in the certification specifications included in the certification basis of the aerodrome</i>" DGAC thus proposes to adopt the same writing in the following modifications for the provisions of Book I and II that refer to CS, and add the amendment of the certification basis, following a change implying new CS which are applicable, in ADR-AR.C.040 (a) :</p> ADR-AR.C.040 (a) – Changes <p>"(a) [...] (4) <i>the corresponding amended certification basis, if relevant.</i> [...]"</p> GM1-ADR.OR.D.005 (b)(4) – Management <p>"SAFETY ASSESSMENT FOR RISK MANAGEMENT ... (d) <i>Necessity for conducting a safety assessment</i></p>	comment by: <i>DGAC Direction Générale de l'aviation civile</i>
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(1) A safety assessment is carried out for all safety concerns, including; identified safety hazards, deviations from requirements or certification specifications or certification basis or and identified change or for any other items or circumstances where such an assessment is considered a contribution to safety assurance. A safety assessment is an everyday process at an aerodrome with a functioning management system. It may be applied in different scale depending on the safety concern to be assessed. The list below is not exhaustive but identifies some of the main reasons for a safety assessment to be applied.
..."

AMC2-ADR-OPS-B.070 - Runway pavement overlays

"The aerodrome operator should ensure that:

- (a) When a runway is to be returned temporarily to an operational status before resurfacing is complete, the temporary ramp should comply with the applicable specifications included in the aerodrome certification basis of the aerodrome CSs;
- (b) Before a runway being overlaid is returned to a temporary operational status, a runway centre line marking conforming to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs should be provided;
- (c) The location of any temporary threshold should conform to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC3-ADR-OPS.B.070 — Marking and lighting of Unserviceable areas

Note: the word "shall" is inappropriately used in this AMC and is to be replaced by "should".

"(a) The aerodrome operator should ensure that:

- (1) Unserviceability markers are displayed whenever any portion of a taxiway, apron or holding bay is unfit for the movement of aircraft but it is still possible for aircraft to bypass the area safely;
 - (2) On a movement area used at night, unserviceability lights should be used;
 - (3) Unserviceability markers and lights are placed at intervals sufficiently close so as to delineate the unserviceable area.
- (b) Unserviceability markers shall should consist of conspicuous upstanding devices such as flags, cones or marker boards;
- (c) Unserviceability markers and lights should meet the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC-ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects

"...

- (c) When flags are used to mark mobile objects, they should comply with the applicable specifications included in the aerodrome certification basis of the aerodrome CSs;

..."

AMC-ADR-OPS.C.015 — Visual Aids and Electrical Systems

Note: the word "shall" is inappropriately used in this AMC, in paragraph (a), and is to be replaced by "should".

- "(a) The aerodrome operator should establish a system of corrective and preventive maintenance which ensures that a light is deemed

*unserviceable when the main beam average intensity is less than 50 % of the value specified in the applicable specifications included in the aerodrome certification basis of the aerodrome CSs. For light units where the designed main beam average intensity is above the specified in the applicable specifications included in the aerodrome certification basis of the aerodrome CSs, the 50 % value shall should be related to that design value;
..."*

response

Noted

Concerning the comment on AMC-ADR.OPS.B.80, it is not agreed since the mobile objects are not included in the certification basis of the aerodrome.

comment

854

comment by: *Finnish Transport Safety Agency*

We suggest to delete the advice for specific colours in AMC-ADR-OPS.B.080 (b) on page 173. "When mobile objects are marked by colour, a single conspicuous colour should be used;"

response

Not accepted

The Agency has followed ICAO Annex 14 6.2.6 Recommendation.

comment

956

comment by: *DGAC Direction Générale de l'aviation civile*

1. Affected paragraphs

- ANNEX III — Part-OPS —ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects (p69)
- AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects (p173)

2. Justification and proposed text / comment

This comment is linked with comment 1220 in book I.

In France, it is a State's responsibility to perform oversight of vehicles on the manoeuvring area. The current wording specifically assigns this responsibility to the aerodrome operator which is in contradiction with the French system and legal provisions. It is essential to provide flexibility for this item. Thus, DGAC proposes to indicate that this is done "without prejudice to the system and legal provisions of the relevant Member State".

Moreover, green colours are not used in France (and many other countries) for emergency vehicles. It can be noted that the recommendation 6.2.6 in ICAO Annex 14 volume 1 states: "When mobile objects are marked by colour, a single conspicuous colour, preferably **red or yellowish green** for emergency vehicles and yellow for service vehicles, should be used."

It is thus proposed to replace the colour by *red or yellowish green* in the corresponding AMC.

ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects

"The aerodrome operator shall ensure that vehicles and other mobile objects, excluding aircraft, on the movement area of the aerodrome are

marked and if the vehicles and aerodrome are used at night or in conditions of low visibility, lighted, without prejudice to the system and legal provisions of the relevant Member State. Aircraft servicing equipment and vehicles used only on aprons may be exempted."

AMC-ADR-OPS.B.080 – Marking and lighting of vehicles and other mobile objects

"(a) Without prejudice to the system and legal provisions of the relevant Member State, tThe aerodrome operator should ensure that all vehicles operating on the manoeuvring area are marked by colours or display flags;

(b) When mobile objects are marked by colour, a single conspicuous colour, preferably red or yellowish green for emergency vehicles and yellow for service vehicles, should be used;

..."

response

Noted

Concerning the comments on AMC-ADR.OPS.B.080, the Agency agrees with the comments on (b) and doesn't agree with the comment on (a) since this is the responsibility of the aerodrome operator.

comment

994

comment by: *Cologne/Bonn Airport*

(b): change preferably "reen" to red for emergency vehicles

response

Accepted

Text revised accordingly.

comment

997

comment by: *Union des Aéroports français - UAF*

Attachment [#216](#)

UAF NPA 2011-20 (B.II) AMC-ADR-OPS.B.080

Référence : AMC-ADR-OPS.B.080
Marking and lighting of vehicles and other mobile objects

Traduction de courtoisie

It is appropriate to transfer the (b) to GM and to modify it in the following way : "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;"

The colour of emergency vehicules is preferably red which permits to be compliant with the recommendation 6.2.6 of the ICAO Annex 14 and to differentiate emergency vehicules from service vehicles. Besides, the colours of emergency vehicules are imposed by rules that are out of the scope of airport safety. That leads to opt for the transfer of this point to GM.

response

Noted

The Agency has followed ICAO Annex 14 6.2.6 Recommendation.

comment

1017

comment by: *CAA Austria - Ministry of Transport*

response	<p>(b) change "green" to "red"</p> <p>(d) delete</p> <p>(e) delete</p> <p>Noted</p> <p>The comment to (b) is agreed while the comments to delete (d) and (e) have not been agreed, since they are ICAO Standards.</p>
comment	<p>1038 comment by: <i>Swedish Regional Airport Association</i></p> <p>Colours should not be specified. (various needs, different countries)</p>
response	<p>Not accepted</p> <p>The Agency has followed ICAO Annex 14 6.2.6 Recommendation.</p>
comment	<p>1049 comment by: <i>Finavia</i></p> <p>Paragraph (b) - for emergency vehicles also colour yellow and red should be recognized.</p> <p>Paragraph (c) and (d) – Low-intensity obstacle lights, which are approved by the state and used on road traffic should be recognized too. In countries (e.g. Nordic countries) where winters and night times last long, these kind of low intensity obstacle lights do not cause as much as trouble as type C and D obstacle lights.</p>
response	<p>Noted</p> <p>The proposed AMC does not prevent a competent authority to use an alternative means of compliance.</p>
comment	<p>1065 comment by: <i>Brussels Airport</i></p> <p>AMC-ADR-OPS.B.080(b) & (CS-ADR-DSN.Q.845) & GM-ADR-DSN.Q.845(d) The text to be lined up with Annex 14. The words 'red or yellowish' were omitted.</p> <p>In NPA 2011-20 B.II AMC-ADR-OPS.B.080(b) "Marking and lighting of vehicles and other mobile objects" it says : 'When mobile objects are marked by colour, a single conspicuous colour, preferably <u>green</u> for emergency vehicles and yellow for service vehicles should be used'.</p> <p>The corresponding Annex 14 recommendation 6.2.6 says : "preferably red or yellowish green".</p> <p>In the Certification Specifications (CS-ADR-DSN.Q.845 – Marking of Objects) nothing is mentioned about the colour of mobile obstacles. But there is in the corresponding Guidance Material : GM-ADR-DSN.Q.845 – Marking of objects (d) : "A single colour, preferably red or yellowish green for emergency vehicles and yellow for service vehicles, is generally used." Here the words red or yellowish are not forgotten, but the word 'conspicuous' is omitted here.</p> <p>We suggest to change the text for AMC-ADR-OPS.B.080(b) and also for</p>

	GM-ADR-DSN.Q.845(d) : "A single <u>conspicuous</u> colour, preferably <u>red</u> or <u>yellowish green</u> for emergency vehicles and yellow for service vehicles, is generally used."
response	Accepted Concerning the comment on the AMC it is agreed and the text has been revised accordingly.
comment	1191 comment by: <i>Salzburger Flughafen GmbH</i> (b) change "green" to "red" (d) delete (e) delete
response	Noted The comment to (b) is agreed while the comments to delete (d) and (e) have not been agreed, since they are ICAO Standards.
comment	1214 comment by: <i>Belgian CAA</i> Annex 14 mentions a "conspicuous colour" and "preferably red or yellowish green". The Belgian CAA believes the Annex 14 wording should be kept.
response	Accepted Text revised accordingly.
comment	1392 comment by: <i>Euroairport Bâle-Mulhouse</i> Attachment #217 Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC-ADR-OPS.B.080 Référence : AMC-ADR-OPS.B.080 Marking and lighting of vehicles and other mobile objects Traduction de courtoisie It is appropriate to transfer the (b) to GM and to modify it in the following way : "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;" The colour of emergency vehicles is preferably red which permits to be compliant with the recommendation 6.2.6 of the ICAO Annex 14 and to differentiate emergency vehicles from service vehicles. Besides, the colours of emergency vehicles are imposed by rules that are out of the scope of airport safety. That leads to opt for the transfer of this point to GM.
response	Noted The Agency has followed ICAO Annex 14 6.2.6 Recommendation.

comment	1497	comment by: <i>Swedish Transport Agency</i>
	We suggest to delete the advice for specific colours in AMC-ADR-OPS.B.080 (b) on page 173. "When mobile objects are marked by colour, a single conspicuous colour should be used;"	
response	Not accepted The Agency has followed ICAO Annex 14 6.2.6 Recommendation.	
comment	1499	comment by: <i>Flughafen Graz Betriebs GmbH</i>
	(b) change "green" to "red" (d) delete (e) delete	
response	Noted The comment to (b) is agreed while the comments to delete (d) and (e) have not been agreed, since they are ICAO Standards.	
comment	1550	comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i>
	(b) change "green" to "red" (d) delete (e) delete	
response	Noted The comment to (b) is agreed while the comments to delete (d) and (e) have not been agreed, since they are ICAO Standards.	
comment	1639	comment by: <i>Geneva International Airport (ROMIG)</i>
	Change from "green" to "red" Consistent with ICAO definition and aerodrome best practices.	
response	<i>Accepted</i> Text revised accordingly.	
comment	1643	comment by: <i>Assaeroporti - Associazione Italiana Gestori Aeroporti</i>
	(b) we suggest to modify as follows: "When mobile objects are marked by colour, a single conspicuous colour, preferably green red or yellowish green for emergency vehicles and	

	<p>yellow for service vehicles, should be used;"</p> <p>In many countries, as well as in Italy, in consistency with ICAO definition most emergency vehicles have these colours.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>1653 comment by: <i>Flughafen Linz-Hörsching - LNZ/LOWL</i></p> <p>(b) change "green" to red or yellowish green</p> <p>(d) delete</p> <p>(e) delete</p>
response	<p>Noted</p> <p>The comment to (b) is agreed while the comments to delete (d) and (e) have not been agreed, since they are ICAO Standards</p>
comment	<p>1744 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>It is appropriate to transfer the (b) to GM and to modify it in the following way : "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;"</p> <p>The colour of emergency vehicules is preferably red which permits to be compliant with the recommendation 6.2.6 of the ICAO Annex 14 and to differentiate emergency vehicules from service vehicles.</p> <p>Besides, the colours of emergency vehicules are imposed by rules that are out of the scope of airport safety.</p> <p>That leads to opt for the transfer of this point to GM.</p>
response	<p>Noted</p> <p>The Agency has followed ICAO Annex 14 6.2.6 Recommendation.</p>
comment	<p>1781 comment by: <i>ENAC Ente Nazionale per l'Aviazione Civile</i></p> <p>Modify point (b) as follows: "When mobile objects are marked by colour, a single conspicuous colour, preferably red or yellowish green for emergency vehicles and yellow for service vehicles, should be used" according with A14 6.2.6 (Rec.).</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>1803 comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #218</p>

	UAF	NPA	2011-20	(B.II)	AMC-ADR-OPS.B.080
	Référence :				AMC-ADR-OPS.B.080
	Marking and lighting of vehicles and other mobile objects				
	Traduction de courtoisie				
	It is appropriate to transfer the (b) to GM and to modify it in the following way : "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;"				
	The colour of emergency vehicules is preferably red which permits to be compliant with the recommendation 6.2.6 of the ICAO Annex 14 and to differentiate emergency vehicules from service vehicles. Besides, the colours of emergency vehicules are imposed by rules that are out of the scope of airport safety. That leads to opt for the transfer of this point to GM.				
response	Noted				
	The Agency has followed ICAO Annex 14 6.2.6 Recommendation.				

comment	1865	comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i>			
	Attachment #219				
	ADBM - NPA 2011-20 (B.II) AMC-ADR-OPS.B.080				
	Référence :				AMC-ADR-OPS.B.080
	Marking and lighting of vehicles and other mobile objects				
	Traduction de courtoisie				
	It is appropriate to transfer the (b) to GM and to modify it in the following way : "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;"				
	The colour of emergency vehicules is preferably red which permits to be compliant with the recommendation 6.2.6 of the ICAO Annex 14 and to differentiate emergency vehicules from service vehicles. Besides, the colours of emergency vehicules are imposed by rules that are out of the scope of airport safety. That leads to opt for the transfer of this point to GM.				
response	Noted				
	The Agency has followed ICAO Annex 14 6.2.6 Recommendation.				

comment	1872	comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i>			
	It is appropriate to transfer the (b) to GM and to modify it in the following way : "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;"				
	The colour of emergency vehicules is preferably red which permits to be compliant with the recommendation 6.2.6 of the ICAO Annex 14 and to				

	<p>differentiate emergency vehicles from service vehicles. Besides, the colours of emergency vehicles are imposed by rules that are out of the scope of airport safety. That leads to opt for the transfer of this point to GM.</p>
response	<p>Noted</p> <p>The Agency has followed ICAO Annex 14 6.2.6 Recommendation.</p>
comment	<p>1876 comment by: Airport Nuremberg - NUE/EDDN</p> <p>(b) Must be adapted to ICAO Annex 14: Recommendation.— <i>When mobile objects are marked by colour, a single conspicuous colour, preferably red or yellowish green for emergency vehicles and yellow for service vehicles, should be used.</i></p> <p>Fire wighting vehicles must be red according to German legislation. Having to change their color to green would lead to a deterioration in recognition of the vehicles, which eventually risks the safety in traffic! This must be changed according to the ICAO Annex 14 recommendation including red and yellowish green, everything else endangers the safety without any benefit!</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>1878 comment by: Airport Nuremberg - NUE/EDDN</p> <p>Should be adapted according to ICAO Annex 14 into:</p> <p>6.2.1 All fixed objects to be marked shall, whenever practicable, be coloured, but if this is not practicable, markers or flags shall be displayed on or above them, except that objects that are sufficiently conspicuous by their shape, size or colour need not be otherwise marked.</p> <p>6.2.2 All mobile objects to be marked shall be coloured or display flags.</p> <p>-> In order to prevent misunderstandings and deviation from current practice, especially since we are talking about ICAO standards!</p>
response	<p>Noted</p> <p>This AMC deals with marking and lighting of vehicles and other mobile objects, and not fixed objects.</p>

comment	<p>1894 comment by: <i>Irish Aviation Authority</i></p> <p><u>Comment:</u> This AMC conflicts with GM-ADR-DSN.Q.845 which suggests a single colour preferably red or yellowish green for emergency vehicles. The wording of AMC-ADR-OPS.B.080 (b) should be changed to agree with the text in GM-ADR-DSN.Q.845 (d) i.e. "When mobile objects are marked by colour, a single conspicuous colour, preferably red or yellowish green for emergency vehicles and yellow for service vehicles, should be used;"</p>
response	<p><u>Accepted</u></p> <p>Text revised accordingly.</p>
comment	<p>1927 comment by: <i>Dublin Airport Authority</i></p> <p>Change to: "Red or Yellowish Green" to be consistent with ICAO definitions. The majority of emergency fleet vehicles across Europe would bear these markings already.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>1977 comment by: <i>Turin Airport - TRN/LIMF</i></p> <p>(b) we suggest to modify as follows:</p> <p>"When mobile objects are marked by colour, a single conspicuous colour, preferably greenred or yellowish green for emergency vehicles and yellow for service vehicles, should be used;"</p> <p>In many countries, as well as in Italy, in consistency with ICAO definition most emergency vehicles have these colours.</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2011 comment by: <i>Munich Airport International</i></p> <p>(b)</p> <p>change from "green" to "red"</p> <p>Justification: consistent with ICAO definition</p>
response	<p>Accepted</p> <p>Text revised accordingly.</p>
comment	<p>2014 comment by: <i>Airport St. Gallen-Altenrhein - ACH/LSZR</i></p> <p>Change "green" to "red", consistent with ICAO</p>

response

Accepted
Text revised accordingly.

comment

2050 comment by: *AENA - Aeropuertos Españoles y Navegación Aérea*

It is proposed to change (b), because we don't understand why the preferably color are green or yellow, we think that it is better not establish any color.

About (d) and (e) we propose to use ICAO light characteristics or EU lighth characteristics that are used by vehicles in roads.

(b) When mobile objects are marked by colour, a single conspicuous colour, ~~preferably green for emergency vehicles and yellow for service vehicles,~~ should be used;
(c) When flags are used to mark mobile objects, they should comply with the applicable CSs;
(d) Low-intensity obstacle lights, Type C ~~or EN lights,~~ should be displayed on vehicles and other mobile objects excluding aircraft;
(e) Low-intensity obstacle lights, Type D ~~or EN lights,~~ should be displayed on follow-me vehicles.

response

Noted
The Agency has followed ICAO Annex 14 6.2.6 Recommendation. Type C and type D low intensity obstacle lights are the ones required by ICAO.

comment

2204 comment by: *Flughafen Klagenfurt*

(b) change "green" to "red"
(d) delete
(e) delete

response

Noted
The comment to (b) is agreed while the comments to delete (d) and (e) have not been agreed, since they are ICAO Standards.

comment

2335 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

<u>Référence : AMC-ADR-OPS.B.080</u>	Marking and lighting of vehicles and other mobile objects
Proposition/commentaire	(b) Il convient de transférer en GM ce point (b) et de le modifier de la manière suivante: "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;"

<p>Justification</p>	<p>La couleur des véhicules d'urgence est de préférence rouge ce qui permet de respecter la recommandation 6.2.6 de l'Annexe 14 de l'OACI et de bien différencier les véhicules d'urgence des véhicules de service. Par ailleurs, les couleurs de véhicules d'urgence sont imposées par des textes qui sortent du cadre de la sécurité aéroportuaire. Ce qui mène à opter pour le déplacement de ce point en GM.</p>
<p>Traduction de courtoisie</p>	<p>It is appropriate to transfer the (b) to GM and to modify it in the following way : "When mobile objects are marked by colour, a single conspicuous colour, preferably green red for emergency vehicles and yellow for service vehicles, should be used;"</p> <p>The colour of emergency vehicles is preferably red which permits to be compliant with the recommendation 6.2.6 of the ICAO Annex 14 and to differentiate emergency vehicles from service vehicles. Besides, the colours of emergency vehicles are imposed by rules that are out of the scope of airport safety. That leads to opt for the transfer of this point to GM.</p>

response

Noted

The Agency has followed ICAO Annex 14 6.2.6 Recommendation.

comment

2483

comment by: *Isavia*

We suggest deleting the advice for specific colours in AMC-ADR-OPS.B.080 (b) on page 173. "When mobile objects are marked by colour, a single conspicuous colour, should be used;"

response

Not accepted

The Agency has followed ICAO Annex 14 6.2.6 Recommendation.

comment

2496

comment by: *DAA Cork Airport*

(b) Change to: "Red or Yellowish Green" to be consistent with ICAO definitions, majority of emergency fleet vehicles across Europe would bear these markings already.

response

Accepted

Text revised accordingly.

comment	2578 AMC.ADR.OPS.B.080 change from "green" to "red" Justification consistent with ICAO definition	comment by: <i>ADV -German Airports Association</i> (b)
response	Accepted Text revised accordingly.	

comment	2676 AMC-ADR-OPS.B.080 — Marking and lighting of vehicles and other mobile objects (b) Editorial When mobile objects are marked by colour, a single conspicuous colour, preferably green for emergency vehicles and yellow for service vehicles, should be used; Proposed Text When mobile objects are marked by colour, a single conspicuous colour, preferably red for emergency vehicles and yellow for service vehicles, should be used; Fraport AG In Germany emergency vehicles are red.	comment by: <i>Fraport AG</i>
response	Accepted Text revised accordingly.	

**NPA 2011-20 (B.II) — AMC/GM to ANNEX III — Part-OPS — SUBPART B
— AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B) — AMC-OPS.B.085 — Handling of
hazardous materials**

p. 173

comment	56 1. Replace all instances of the term "hazardous materials" by "dangerous goods". 2. What constitutes an "agent". On any airport there will potentially be a number of airlines and also of ground handling agents (GHA) any number of whom may be involved in the acceptance, handling and uplift of dangerous goods in cargo. If there are maintenance organisations located on the aerodrome, they may be using dangerous goods as part of their activities, e.g. paints, solvents, etc. Passengers are permitted under the provisions of the ICAO	comment by: <i>International Air Transport Association</i>
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Technical Instructions to carry as part of their baggage some items of dangerous goods. These baggage items tendered by the passengers as checked baggage will be "handled" by the airline/GHA. The ICAO Technical Instructions already address dangerous goods training for all persons involved in the handling and acceptance of baggage and cargo. Where dangerous goods are specifically "stored", as opposed being in transport then it's likely that national or local "dangerous goods storage" regulations will apply.

3. AMC-OPS.B.085 (b)(1). What is intended by this statement? Is it expected that the aerodrome operator will somehow have to maintain a list of all persons working for an airlines or a GHA who accept and handle baggage and cargo that may contain dangerous goods.
4. AMC-OPS.B.085 (b)(2). This is totally impractical. The aerodrome operator will have no contact with, or knowledge or, all shippers of dangerous goods as cargo which may accepted for carriage for departure from that aerodrome, i.e. point of origin, may be destined for that aerodrome from any other aerodrome anywhere in the world, i.e. point of destination, or may only be in transit through that aerodrome. Any requirements for "special handling procedures" will be addressed between the shipper and the airline responsible for uplift of the cargo.
5. AMC-OPS.B.085 (b)(3). Any requirement for "special areas for storage" should be subject to careful consideration. Dangerous goods in cargo is in transport; for the transport to be managed efficiently by the airline/GHA there needs to be operational flexibility such that the goods can be processed for uplift on the aircraft, which will typically mean loading into aircraft unit load devices (ULD). These loaded ULD may need to be moved around within the cargo terminal as part of flight preparation, which may include temporary storage. The loaded ULDs will then be assembled onto dollies, or other transport devices for movement to the aircraft for loading. Goods inbound or in transit will go through similar movement. All of this movement must be allowed to happen as efficiently as possible and therefore additional specific requirements for dangerous goods, unless there is a clear safety justification, should be avoided.

response

Accepted

AMC - ADR.OPS.B.085 has been deleted.

comment

178

comment by: *Swedavia AB - Swedish airports (currently 11 airports)*

This is performed by cargo companies and air operators and is governed through ICAO Annex 18, DGR.

response

Accepted

AMC - ADR.OPS.B.085 has been deleted.

comment

193

comment by: *SWISS AERODROMES ASSOCIATION*

At letter (b), the choice of colour must be left open. There is no need to unify it.

response Noted

Refer to responses to similar comments.

comment 596 comment by: *Exeter International Airport*

AMC-OPS.B.085 - This scope is too wide and should be reduced. This is not a responsibility of the aerodrome operator. Storage and handling of Dangerous Goods are the responsibility of the freight operators and the airlines and handling agents

response *Accepted*

AMC - ADR.OPS.B.085 has been deleted.

comment 669 comment by: *Aéroport La Rochelle - LRH/LFBH*

Attachment [#220](#)

LFBH NPA 2011-20 (B.II) AMC-ADR-OPS.B.085

Référence : AMC-ADR-OPS.B.085
Handling of hazardous materials

Proposition/commentaire
Il convient de supprimer cet AMC.

Justification
La rédaction de cet article est trop contraignante: l'exploitant d'aérodrome ne peut être conforme à cet AMC car il ne peut pas avoir les compétences nécessaires pour le réaliser.

response Accepted

AMC - ADR.OPS.B.085 has been deleted.

comment 740 comment by: *ADP : Aeroports de Paris*

Référence : AMC-ADR-OPS.B.085	Handling of hazardous materials
Proposition/commentaire	Il convient de supprimer cet AMC.
Justification	La rédaction de cet article est trop contraignante: l'exploitant d'aérodrome ne peut être conforme à cet AMC car il ne peut pas avoir les compétences nécessaires pour le réaliser.
Traduction de courtoisie	It is appropriate to delete this AMC. The writing of this article is too restricting: the aerodrome operator cannot be compliant to this AMC because he cannot

	have the competences necessary to carry out it.
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response Accepted
AMC - ADR.OPS.B.085 has been deleted.

comment 959 comment by: DGAC Direction Générale de l'aviation civile

1. Affected paragraphs

- ANNEX III — Part-OPS —ADR-OPS.B.085 — Handling of hazardous materials (p69)
- AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS.B.085 — Handling of hazardous materials (p173)
- AMC/GM to ANNEX III — Part-OPS —GM-ADR-OPS.B.085 — Handling of hazardous materials (p173-174)

2. Justification and proposed text / comment

This comment is linked with comment 1222 in book I.

In France, it is a State's responsibility to ensure that such procedures are established and complied with. The current wording specifically assigns this responsibility to the aerodrome operator which is in contradiction with the French system and legal provisions. It is essential to provide flexibility for this item. Thus, DGAC proposes to indicate that this is done *"without prejudice to the system and legal provisions of the relevant Member State"*.

Moreover, the wording used in the AMC and GM is not suitable: see below the modifications: *"should"* (instead of *"shall"*) for the AMC and *"may"* (instead of *"should"*) for the GM.

Finally, *"airport"* is no more relevant for such regulation, the word *"aerodrome"* is to be used instead.

ADR-OPS.B.085 — Handling of hazardous materials

"The aerodrome operator shall ensure that procedures are established and maintained for the protection of persons and property on the aerodrome during the handling and storing of any hazardous materials that is or is intended to be transported by air, without prejudice to the system and legal provisions of the relevant Member State."

AMC-OPS.B.085 — Handling of hazardous materials

"(a) The aerodrome operator shall ~~shall~~ should ensure that all agents involved in the handling and storing of any hazardous materials comply with the established procedures, without prejudice to the system and legal provisions of the relevant Member State;

(b) The procedures shall ~~shall~~ should include at least the following:

(1) Designated personnel to receive and handle hazardous substances and materials;

(2) Assurance from the shipper that the cargo can be handled safely, including any special handling procedures required for safety;

(3) Special areas for storage of hazardous materials while on the aerodrome ~~airport~~."

GM- OPS.B.085 — Handling of hazardous materials

	<p>"The procedure should may ensure the safe handling of hazardous materials or dangerous goods on the aerodrome, including: [...] (b) The aerodrome operator should may include the following information in the procedure for handling hazardous materials: [...]"</p>
response	<p>Accepted</p> <p>AMC - ADR.OPS.B.085 has been deleted.</p>
comment	<p>998 comment by: <i>Union des Aéroports français - UAF</i></p> <p>Attachment #221</p> <p>UAF NPA 2011-20 (B.II) AMC-ADR-OPS.B.085</p> <p>Référence : AMC-ADR-OPS.B.085 Handling of hazardous materials</p> <p>Traduction de courtoisie It is appropriate to delete this AMC. The writing of this article is too restricting: the aerodrome operator cannot be compliant to this AMC because he cannot have the competences necessary to carry out it.</p>
response	<p>Accepted</p> <p>AMC - ADR.OPS.B.085 has been deleted.</p>
comment	<p>1393 comment by: <i>Euroairport Bâle-Mulhouse</i></p> <p>Attachment #222</p> <p>Aéroport Bâle – Mulhouse NPA 2011-20 (B.II) AMC-ADR-OPS.B.085</p> <p>Référence : AMC-ADR-OPS.B.085 Handling of hazardous materials</p> <p>Traduction de courtoisie It is appropriate to delete this AMC. The writing of this article is too restricting: the aerodrome operator cannot be compliant to this AMC because he cannot have the competences necessary to carry out it.</p>
response	<p>Noted</p> <p>AMC - ADR.OPS.B.085 has been deleted.</p>
comment	<p>1745 comment by: <i>Aéroport de Marseille - MRS/LFML</i></p> <p>It is appropriate to delete this AMC. The writing of this article is too restricting: the aerodrome operator cannot be compliant to this AMC because he cannot have the competences necessary to carry out it</p>
response	<p>Noted</p>

AMC - ADR.OPS.B.085 has been deleted.

comment **1804** comment by: *Aéroport Nantes Atlantique - NTE/LFRS*
Attachment [#223](#)
UAF NPA 2011-20 (B.II) AMC-ADR-OPS.B.085
Référence : AMC-ADR-OPS.B.085
Handling of hazardous materials
Traduction de courtoisie
It is appropriate to delete this AMC.
The writing of this article is too restricting: the aerodrome operator cannot be compliant to this AMC because he cannot have the competences necessary to carry out it.

response Accepted
AMC - ADR.OPS.B.085 has been deleted.

comment **1866** comment by: *ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD*
Attachment [#224](#)
ADBM - NPA 2011-20 (B.II) AMC-ADR-OPS.B.085
Référence : AMC-ADR-OPS.B.085
Handling of hazardous materials
Traduction de courtoisie
It is appropriate to delete this AMC.
The writing of this article is too restricting: the aerodrome operator cannot be compliant to this AMC because he cannot have the competences necessary to carry out it.

response Accepted
AMC - ADR.OPS.B.085 has been deleted.

comment **1873** comment by: *Pau Pyrénées Airport - PUF/LFBP*
It is appropriate to delete this AMC.
The writing of this article is too restricting: the aerodrome operator cannot be compliant to this AMC because he cannot have the competences necessary to carry out it.
By the way regulation concerning hazardous materials is compulsory with regards to human factor and aircraft handling.

response Accepted
AMC - ADR.OPS.B.085 has been deleted.

comment **1895** comment by: *Airport Nuremberg - NUE/EDDN*

The aerodrome operator itself has no contact or influence on hazardous material in freight and baggage since this is dealt with by ground handling and cargo providers exclusively. The EU regulations 15/2010 and 859/2011 are already dealing with that matter, that should be sufficient. It is suggested to delete this AMC or move it to the Guidance Material.

response Accepted
AMC - ADR.OPS.B.085 has been deleted.

comment 2336 comment by: *ACA - Aéroports de la Côte d'Azur - NCE/LFMN*

Référence : AMC-ADR-OPS.B.085	Handling of hazardous materials
Proposition/commentaire	Il convient de supprimer cet AMC.
Justification	La rédaction de cet article est trop contraignante: l'exploitant d'aérodrome ne peut être conforme à cet AMC car il ne peut pas avoir les compétences nécessaires pour le réaliser.
Traduction de courtoisie	It is appropriate to delete this AMC. The writing of this article is too restricting: the aerodrome operator cannot be compliant to this AMC because he cannot have the competences necessary to carry out it.

response Accepted
AMC - ADR.OPS.B.085 has been deleted.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND INSTALLATIONS (ADR.OPS.B) – GM-OPS.B.085 – Handling of hazardous materials p. 173-174

comment 3 comment by: *Croatian Civil Aviation Agency*

AMC-OPS.B.085 – Handling of ~~hazardous materials~~ dangerous goods ^{TXT}

(a) The aerodrome operator shall ensure that all agents involved in the handling and storing of any hazardous materials comply with the established procedures;

(b) The procedures shall include at least the following:

(1) Designated personnel to receive and handle ~~hazardous substances and materials~~ dangerous goods;

(2) Assurance from the shipper that the cargo can be handled safely, including any special handling procedures required for safety;

(3) Special areas for storage of ~~hazardous materials~~ dangerous goods

	while on the airport.
response	Accepted GM-ADR.OPS.B.085 has been deleted.
comment	57 comment by: <i>International Air Transport Association</i> <ol style="list-style-type: none">1. Replace all instances of the term "hazardous materials" by "dangerous goods".2. GM-OPS.B.085(a). The list is incorrect and incomplete. The list should reflect that for the classes of dangerous goods as shown in the ICAO Technical Instructions.3. GM-OPS.B.085(b). There may/will be a large number of different organisations on an aerodrome involved in handling dangerous goods being transported by air. These will include freight forwarders, airlines and GHA. It is probably not feasible to expect the aerodrome operator to have documented the responsibilities of each of these entities. It perhaps should simply be stated that the handling and transport by air of dangerous goods must be in accordance with the ICAO Technical Instructions, perhaps with reference to national/local regulations, if applicable for storage of dangerous goods.4. Probably the only truly relevant requirement in this document is for the aerodrome operator to have clear procedures for the handling of dangerous goods incidents, and this should be expanded to include dangerous goods accidents. This must address aircraft related dangerous goods incidents/accidents as well as those where an aircraft is not directly involved, e.g. spills, leakage or fire involving dangerous goods in a cargo terminal.
response	Accepted GM-ADR.OPS.B.085 has been deleted.
comment	959 ❖ comment by: <i>DGAC Direction Générale de l'aviation civile</i> <u>1. Affected paragraphs</u> <ul style="list-style-type: none">• ANNEX III — Part-OPS —ADR-OPS.B.085 — Handling of hazardous materials (p69)• AMC/GM to ANNEX III — Part-OPS —AMC-ADR-OPS.B.085 — Handling of hazardous materials (p173)• AMC/GM to ANNEX III — Part-OPS —GM-ADR-OPS.B.085 — Handling of hazardous materials (p173-174) <u>2. Justification and proposed text / comment</u> <p>This comment is linked with comment 1222 in book I. In France, it is a State's responsibility to ensure that such procedures are established and complied with. The current wording specifically assigns this responsibility to the aerodrome operator which is in contradiction with the French system and legal provisions. It is essential to provide flexibility for this item. Thus, DGAC proposes to indicate that this is done "without prejudice to the system and legal provisions of the relevant Member State".</p>

Moreover, the wording used in the AMC and GM is not suitable: see below the modifications: "should" (instead of "shall") for the AMC and "may" (instead of "should") for the GM.
Finally, "airport" is no more relevant for such regulation, the word "aerodrome" is to be used instead.

ADR-OPS.B.085 – Handling of hazardous materials

"The aerodrome operator shall ensure that procedures are established and maintained for the protection of persons and property on the aerodrome during the handling and storing of any hazardous materials that is or is intended to be transported by air, without prejudice to the system and legal provisions of the relevant Member State."

AMC-OPS.B.085 – Handling of hazardous materials

"(a) The aerodrome operator shall ~~shall~~ **should** ensure that all agents involved in the handling and storing of any hazardous materials comply with the established procedures, without prejudice to the system and legal provisions of the relevant Member State;

(b) The procedures ~~shall~~ **should** include at least the following:

- (1) Designated personnel to receive and handle hazardous substances and materials;
- (2) Assurance from the shipper that the cargo can be handled safely, including any special handling procedures required for safety;
- (3) Special areas for storage of hazardous materials while on the aerodrome ~~airport~~.

GM- OPS.B.085 – Handling of hazardous materials

"The procedure ~~should~~ **may** ensure the safe handling of hazardous materials or dangerous goods on the aerodrome, including:

[...]

(b) The aerodrome operator ~~should~~ **may** include the following information in the procedure for handling hazardous materials:

[...]"

response

Accepted

GM-ADR.OPS.B.085 has been deleted.

NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART C – AERODROME MAINTENANCE (ADR.OPS.C) – AMC-ADR-OPS.C.005 – General p. 175

comment

42

comment by: ACI EUROPE - Airports Council International

(b) delete

Justification: coming out of the blue - no justification that it is needed

response

Accepted

Point (b) has been moved to a new GM -ADR.OPS.C.005.

comment

151

comment by: CAA-NL

	We suggest to delete item (b). It is not clear what is needed on human factor principles and what the safety relevance is.								
response	Accepted Point (b) has been moved to a new GM -ADR.OPS.C.005.								
comment	371 comment by: <i>Avinor</i> AMC.ADR.OPS.C.005 (b). Should be deleted to be consistent with ICAO definition. What is the justification?								
response	Accepted Point (b) has been moved to a new GM -ADR.OPS.C.005.								
comment	603 comment by: <i>Flughafen Duesseldorf GmbH</i> (b) should be deleted.								
response	Accepted Point (b) has been moved to a new GM -ADR.OPS.C.005.								
comment	742 comment by: <i>ADP : Aeroports de Paris</i>								
	<table border="1"> <thead> <tr> <th data-bbox="386 1048 817 1120">Référence : AMC-ADR-OPS.C.005</th> <th data-bbox="817 1048 1398 1120">General</th> </tr> </thead> <tbody> <tr> <td data-bbox="386 1120 817 1191">Proposition/commentaire</td> <td data-bbox="817 1120 1398 1191">Il convient de supprimer le (b).</td> </tr> <tr> <td data-bbox="386 1191 817 1335">Justification</td> <td data-bbox="817 1191 1398 1335">Les principes des facteurs humains pour la maintenance d'aérodrome sont encore trop flous pour pouvoir être repris.</td> </tr> <tr> <td data-bbox="386 1335 817 1505">Traduction de courtoisie</td> <td data-bbox="817 1335 1398 1505">It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.</td> </tr> </tbody> </table>	Référence : AMC-ADR-OPS.C.005	General	Proposition/commentaire	Il convient de supprimer le (b).	Justification	Les principes des facteurs humains pour la maintenance d'aérodrome sont encore trop flous pour pouvoir être repris.	Traduction de courtoisie	It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.
Référence : AMC-ADR-OPS.C.005	General								
Proposition/commentaire	Il convient de supprimer le (b).								
Justification	Les principes des facteurs humains pour la maintenance d'aérodrome sont encore trop flous pour pouvoir être repris.								
Traduction de courtoisie	It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.								
response	Accepted Point (b) has been moved to a new GM -ADR.OPS.C.005.								
comment	995 comment by: <i>Cologne/Bonn Airport</i> (b): ? , no justification for this								
response	Accepted Point (b) has been moved to a new GM -ADR.OPS.C.005.								
comment	1001 comment by: <i>Union des Aéroports français - UAF</i> Attachment #225								

	UAF	NPA	2011-20	(B.II)	AMC-ADR-OPS.C.005
	Référence General		:		AMC-ADR-OPS.C.005
	Traduction It is appropriate		de	to delete	the (b). courtoisie The human factors principles for aerodrome maintenance are still too vague to be applied.
response	Accepted				Point (b) has been moved to a new GM -ADR.OPS.C.005.
comment	1395			comment by: <i>Euroairport Bâle-Mulhouse</i>	
	Attachment #226				
	Aéroport Bâle – Mulhouse	NPA 2011-20	(B.II)	AMC-ADR-OPS.C.005	
	Référence General		:		AMC-ADR-OPS.C.005
	Traduction It is appropriate		de	to delete	the (b). courtoisie The human factors principles for aerodrome maintenance are still too vague to be applied.
response	Accepted				Point (b) has been moved to a new GM -ADR.OPS.C.005.
comment	1644			comment by: <i>Assaeroporti - Associazione Italiana Gestori Aeroporti</i>	
	(b) the sentence has to be deleted:				
	(b) the design and application of the maintenance programme should observe human factors principles.				
response	Accepted				Point (b) has been moved to a new GM -ADR.OPS.C.005.
comment	1746			comment by: <i>Aéroport de Marseille - MRS/LFML</i>	
	It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.				
response	Accepted				Point (b) has been moved to a new GM -ADR.OPS.C.005.
comment	1759			comment by: <i>Innsbruck Airport Authority - Tiroler Flughafenbetriebsges. mbH</i>	

	(b) delete
response	<p>Accepted</p> <p>Point (b) has been moved to a new GM -ADR.OPS.C.005.</p>
comment	<p><i>1805</i> comment by: <i>Aéroport Nantes Atlantique - NTE/LFRS</i></p> <p>Attachment #227</p> <p>UAF NPA 2011-20 (B.II) AMC-ADR-OPS.C.005</p> <p>Référence : AMC-ADR-OPS.C.005 General</p> <p>Traduction de courtoisie It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.</p>
response	<p>Accepted</p> <p>Point (b) has been moved to a new GM -ADR.OPS.C.005.</p>
comment	<p><i>1858</i> comment by: <i>ADBM - Aeroport de Bordeaux Merignac - BOD/LFBD</i></p> <p>Attachment #228</p> <p>ADBM - NPA 2011-20 (B.II) AMC-ADR-OPS.C.005</p> <p>Référence : AMC-ADR-OPS.C.005 General</p> <p>Traduction de courtoisie It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.</p>
response	<p>Accepted</p> <p>Point (b) has been moved to a new GM -ADR.OPS.C.005.</p>
comment	<p><i>1861</i> comment by: <i>Pau Pyrénées Airport - PUF/LFBP</i></p> <p>It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.</p>
response	<p>Accepted</p> <p>Point (b) has been moved to a new GM -ADR.OPS.C.005.</p>
comment	<p><i>1978</i> comment by: <i>Turin Airport - TRN/LIMF</i></p> <p>(b) the sentence has to be deleted:</p> <p>(b) the design and application of the maintenance programme should</p>

	observe human factors principles.								
response	Accepted Point (b) has been moved to a new GM -ADR.OPS.C.005.								
comment	2013 comment by: <i>Munich Airport International</i> (b) delete Justification: coming out of the blue - no justification that it is needed								
response	Accepted Point (b) has been moved to a new GM -ADR.OPS.C.005.								
comment	2337 comment by: <i>ACA - Aéroports de la Côte d'Azur - NCE/LFMN</i>								
	<table border="1"> <tr> <td><u>Référence : AMC-ADR-OPS.C.005</u></td> <td>General</td> </tr> <tr> <td>Proposition/commentaire</td> <td>Il convient de supprimer le (b).</td> </tr> <tr> <td>Justification</td> <td>Les principes des facteurs humains pour la maintenance d'aérodrome sont encore trop flous pour pouvoir être repris.</td> </tr> <tr> <td>Traduction de courtoisie</td> <td>It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.</td> </tr> </table>	<u>Référence : AMC-ADR-OPS.C.005</u>	General	Proposition/commentaire	Il convient de supprimer le (b).	Justification	Les principes des facteurs humains pour la maintenance d'aérodrome sont encore trop flous pour pouvoir être repris.	Traduction de courtoisie	It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.
<u>Référence : AMC-ADR-OPS.C.005</u>	General								
Proposition/commentaire	Il convient de supprimer le (b).								
Justification	Les principes des facteurs humains pour la maintenance d'aérodrome sont encore trop flous pour pouvoir être repris.								
Traduction de courtoisie	It is appropriate to delete the (b). The human factors principles for aerodrome maintenance are still too vague to be applied.								
response	Accepted Point (b) has been moved to a new GM -ADR.OPS.C.005.								
comment	2579 comment by: <i>ADV -German Airports Association</i> AMC.ADR.OPS.C.005 (b) delete Justification coming out of the blue - no justification that it is needed								
response	Accepted Point (b) has been moved to a new GM -ADR.OPS.C.005.								
comment	2677 comment by: <i>Fraport AG</i> AMC-ADR-OPS.C.005 — General (b) Editorial								

	Complete paragraph	
	Delete complete paragraph	
	Fraport	AG
	Recognition of human factors is not qualified for AMC.	
response	Accepted	
	Point (b) has been moved to a new GM -ADR.OPS.C.005.	

<p>NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART C – AERODROME MAINTENANCE (ADR.OPS.C) – AMC-ADR-OPS.C.010 – Pavements, other ground surfaces and drainage</p>	p. 175
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comment	152	comment by: CAA-NL
	We suggest to add 'and take immediate corrective maintenance action' after the last word 'runway' of subpart (f), because it is important to take immediate corrective action if the friction is below the minimum friction level value and not to only publish it in a NOTAM.	
response	Accepted	
	Text revised accordingly.	

comment	194	comment by: SWISS AERODROMES ASSOCIATION
	At letter (a), we ask EASA to stick to the ICAO wording (Annex 14, 10.2.8)	
response	Partially accepted	
	Text has been revised according to the proposal. The requirement for removing snow, ice, slush, and standing water has not been included since it has been addressed in AMC - ADR.OPS.B.035 'Operations in winter conditions'.	

comment	1964	comment by: DGAC Direction Générale de l'aviation civile
	<u>1. Affected paragraphs</u>	
	<ul style="list-style-type: none"> BII - AMC-ADR-OPS.C.010 – Pavements, other ground surfaces and drainage (p175) 	
	<u>2. Justification and proposed text / comment</u>	
	Maintenance/checking of drainage systems should be extended to the stormwater collection systems available at the aerodrome.	
	The uncertainty of the measure of CFME, the complexity of these measures systems and the reliance of the measures on the type of device used have justified that States control these devices and their use. Indeed, the determination of a minimum friction level is closely linked to the quality of the device used and its using procedure. The proposition below complies with State Letter 41/11 with which this NPA should comply	

with.

AMC-ADR-OPS.C.010 – Pavements, other ground surfaces and drainage

"[...] (c) Drainage systems and stormwater collection system should be periodically checked and, if necessary cleaned or maintained, to ensure efficient water run-off;

(d) The aerodrome operator should measure the runway surface friction characteristics for maintenance purpose with a self-wetting continuous friction measuring device using self-wetting features calibrated and operated according to the specifications set by the competent authority. The frequency of these measurements should be sufficient to determine the trend of the surface friction characteristics of the runway; [...]"

response

Noted

The comment on (c) is agreed and text revised accordingly

The comments on (d) are not agreed since the Agency has decided to follow only ICAO mature and well established material. However, the issue of the friction measurement equipment will be dealt with in the future rulemaking task on aerodrome equipment.

comment

2158

comment by: Danish Transport Authority

(d) Part of the article "The frequency of these measurements should be sufficient to determine the trend of the surface friction characteristics of the runway;" shall be moved to ADR.OPS.C.010 (b) (3) . See comment ADR.OPS.C.010.

response

Accepted

Text has been moved to ADR.OPS.C.010 (b) (3).

comment

2159

comment by: Danish Transport Authority

e) It should be aligned with ICAO Annex 14, article 10.2.5 regarding a level for preventive maintenance purposes. Suggest to modify item e) to "The aerodrome operator should take corrective maintenance action to prevent the runway surface friction characteristics for either the entire runway or a portion thereof from falling below a maintenance planning level specified by the competent authority".

response

Partially accepted

The proposal has been included as new Guidance Material.

comment

2173

comment by: ECA - European Cockpit Association

Amend (b) as follows:

(b) Taxiways ~~and aprons~~ should be kept clear of pollutants to the extent necessary to enable aircraft to be taxied to and from an operational runway. **Aprons should be kept clear of pollutants to the extent necessary to enable aircraft to manoeuvre safely or, where appropriate, to be towed or pushed.**

response	<p>Justification: Return to the ICAO wording, which is clearer and more precise. Reference: ICAO Annex 14 10.2.9/10</p> <p>Accepted</p> <p>A new point is inserted.</p>
comment	<p>2174 <i>comment by: ECA - European Cockpit Association</i></p> <p>Add the following paragraph under subsection (c): When there is reason to believe that the drainage characteristics of a runway or portions thereof are poor due to slopes or depressions then the runway friction characteristics should be assessed under natural or simulated conditions that are representative of local rain and corrective maintenance action should be taken as necessary.</p> <p>Justification: Missing paragraph from ICAO. We believe this paragraph should be upgraded to IR. Reference: ICAO Annex 14, paragraph 10.2.6; IFALPA Annex 14, paragraph 10.2.6</p>
response	<p>Accepted</p> <p>A new point is inserted.</p>
comment	<p>2175 <i>comment by: ECA - European Cockpit Association</i></p> <p>Comment on (e): This paragraph should be upgraded to IR. Add the following note to this paragraph: Note.— A portion of runway in the order of 100 m long may be considered significant for maintenance or reporting action.</p> <p>Justification: Missing note from ICAO, which gives the operator guidance as to what is a significant portion of runway. Furthermore, this text is a standard in the ICAO Annex 14 and should therefore be in the more binding IR part rather than as AMC. Reference: ICAO Annex 14, paragraph 10.2.4</p>
response	<p>Accepted</p> <p>Paragraph (e) has been upgraded to IR. The proposed note will be transferred to GM.</p>
comment	<p>2177 <i>comment by: ECA - European Cockpit Association</i></p> <p>Add a new paragraph (g) as follows: Whenever the clearance of snow, slush, ice, etc., from the various parts of the movement area cannot be carried out simultaneously, the order of priority should be as follows but may be altered following, as necessary, consultation with the aerodrome users:</p>

	<p>1st — runway(s) in use; 2nd — taxiways serving runway(s) in use; 3rd — apron(s); 4th — holding bays; and 5th — other areas.</p> <p>Justification: Missing paragraph from ICAO ANnex 14. Reference: ICAO Annex 14, paragraph 10.2.11</p>
response	<p>Noted</p> <p>This is addressed in GM1 – ADR.OPS.B.035 (c) (4).</p>
comment	<p>2179 <i>comment by: ECA - European Cockpit Association</i></p> <p>Add new paragraph (h) as follows: Chemicals to remove or to prevent the formation of ice and frost on aerodrome pavements should be used when conditions indicate their use could be effective. Caution should be exercised in the application of the chemicals so as not to create a more slippery condition. In particular runways planned for use by aircraft de-iced or anti-iced by AEA Type II fluids, rubber deposits should be removed prior to operations on runways with freezing contaminants.</p> <p>Justification: The first part is a missing paragraph from ICAO Annex 14. The second part is taken from IFALPA Annex 14. Reference: ICAO Annex 14, paragraph 10.2.12; and IFALPA Annex 14, paragraph 10.2.8.z.</p>
response	<p>Noted</p>

**NPA 2011-20 (B.II) – AMC/GM to ANNEX III – Part-OPS – SUBPART C
– AERODROME MAINTENANCE (ADR.OPS.C) – AMC-ADR-OPS.C.015 – p. 176
Visual Aids and Electrical Systems**

comment	<p>839 ❖ <i>comment by: DGAC Direction Générale de l'aviation civile</i></p> <p><u>1. Affected paragraphs</u></p> <ul style="list-style-type: none">• ANNEX II – Part-OR – ADR.OR.B.040 – Changes (p41-42)• Annex I – Part AR – ADR-AR.C.040 (a) – Changes (p26)• AMC/GM to ANNEX II – Part-OR – GM1-ADR.OR.D.005 (b)(4) – Management - safety assessment for risk management (p74-87)• AMC/GM to ANNEX II – Part-OPS – AMC2-ADR-OPS-B.070 – Runway pavement overlays (p163)• AMC/GM to ANNEX II – Part-OPS – AMC3-ADR-OPS.B.070 – Marking and lighting of Unserviceable areas (p163)• AMC/GM to ANNEX II – Part-OPS – AMC-ADR-OPS.B.080 – Marking and lighting of vehicles and other mobile objects (p173)• AMC/GM to ANNEX II – Part-OPS – AMC-ADR-OPS.C.015 – Visual
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Aids and Electrical Systems (p176)

2. Justification and proposed text / comment

This comment is linked with comment 1087 in book I.

Referencing to the Certification specifications in Book I and Book II is not relevant because CS are referring to essential requirements and are applicable only through the certification basis of the aerodrome which includes: the CS applicable to the given aerodrome, and ELOS and SC where appropriate.

This is already taken into account in AMC1-ADR.AR.C.035(f) — Issuance of certificate – paragraph (b) – page 29 : *"prescribed in the certification specifications included in the certification basis of the aerodrome"*

DGAC thus proposes to adopt the same writing in the following modifications for the provisions of Book I and II that refer to CS, and add the amendment of the certification basis, following a change implying new CS which are applicable, in ADR-AR.C.040 (a) :

ADR-AR.C.040 (a) – Changes

"(a) [...]

(4) *the corresponding amended certification basis, if relevant.*

[...]"

GM1-ADR.OR.D.005 (b)(4) – Management

"SAFETY ASSESSMENT FOR RISK MANAGEMENT

...

(d) Necessity for conducting a safety assessment

(1) A safety assessment is carried out for all safety concerns, including; identified safety hazards, deviations from requirements or certification specifications or certification basis or and identified change or for any other items or circumstances where such an assessment is considered a contribution to safety assurance. A safety assessment is an everyday process at an aerodrome with a functioning management system. It may be applied in different scale depending on the safety concern to be assessed. The list below is not exhaustive but identifies some of the main reasons for a safety assessment to be applied.

..."

AMC2-ADR-OPS-B.070 - Runway pavement overlays

"The aerodrome operator should ensure that:

(a) When a runway is to be returned temporarily to an operational status before resurfacing is complete, the temporary ramp should comply with the applicable specifications included in the aerodrome certification basis of the aerodrome CSs;

(b) Before a runway being overlaid is returned to a temporary operational status, a runway centre line marking conforming to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs should be provided;

(c) The location of any temporary threshold should conform to the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC3-ADR-OPS.B.070 – Marking and lighting of Unserviceable areas

Note: the word "shall" is inappropriately used in this AMC and is to be replaced by "should".

"(a) *The aerodrome operator should ensure that:*

(1) Unserviceability markers are displayed whenever any portion of a taxiway, apron or holding bay is unfit for the movement of aircraft but it is still possible for aircraft to bypass the area safely;
(2) On a movement area used at night, unserviceability lights should be used;
(3) Unserviceability markers and lights are placed at intervals sufficiently close so as to delineate the unserviceable area.
(b) Unserviceability markers ~~shall~~ **should** consist of conspicuous upstanding devices such as flags, cones or marker boards;
(c) Unserviceability markers and lights should meet the applicable specifications included in the aerodrome certification basis of the aerodrome CSs."

AMC-ADR-OPS.B.080 – Marking and lighting of vehicles and other mobile objects

"...
(c) When flags are used to mark mobile objects, they should comply with the applicable specifications included in the aerodrome certification basis of the aerodrome CSs;
..."

AMC-ADR-OPS.C.015 – Visual Aids and Electrical Systems

Note: the word "shall" is inappropriately used in this AMC, in paragraph (a), and is to be replaced by "should".

"(a) The aerodrome operator should establish a system of corrective and preventive maintenance which ensures that a light is deemed unserviceable when the main beam average intensity is less than 50 % of the value specified in the applicable specifications included in the aerodrome certification basis of the aerodrome CSs. For light units where the designed main beam average intensity is above the specified in the applicable specifications included in the aerodrome certification basis of the aerodrome CSs, the 50 % value ~~shall~~ **should** be related to that design value;
..."


response Accepted
Text revised accordingly.


comment 2182 comment by: ECA - European Cockpit Association
Add the following paragraph (c):
(c) During low visibility procedures the appropriate authority should restrict construction or maintenance activities in the proximity of aerodrome electrical systems.


Justification:
Missing paragraph from ICAO Annex 14.
Furthermore, it seems that there is significant guidance in ICAO Annex 14, section 10.4 on low visibility lighting that is missing. Are these paragraphs covered elsewhere in the NPA?
Reference: ICAO Annex 14, paragraph 10.4.13.


response Accepted
The text will be added in AMC-ADR.OPS.B.045 Low Visibility Procedures.


Appendix A
Attachments


 [Comments on ADR-OR Part II German.pdf](#)
Attachment #1 to comment [#583](#)


 [Comments on ADR-AR.pdf](#)
Attachment #2 to comment [#583](#)


 [Comments on ADR-OR Part I.pdf](#)
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 [Comments on ADR-OPS.pdf](#)
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 [EAP NPA 2011-20 \(B.II\) AMC8-ADR-OPS.B.010.pdf](#)
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 [UAF NPA 2011-20 \(B.II\) AMC8-ADR-OPS.B.010.pdf](#)
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 [ADBM NPA 2011-20 B.II AMC8-ADR-OPS.B.010.pdf](#)
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 [NPA 2001 B.II AMC8-ADR-OPS.B.010.pdf](#)
Attachment #161 to comment [#1852](#)


 [NPA 2001 B.II AMC8-ADR-OPS.B.010.pdf](#)
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 [ATB NPA 2011-20 \(B.II\) AMC8-ADR-OPS.B.010.pdf](#)
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 [UAF NPA 2011-20 \(B.II\) GM2-ADR-OPS.B.010.pdf](#)
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 [EAP NPA 2011-20 \(B.II\) GM2-ADR-OPS.B.010.pdf](#)
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 [UAF NPA 2011-20 \(B.II\) AMC-ADR-OPS.B.035.pdf](#)
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 [UAF NPA 2011-20 \(B.II\) GM-ADR-OPS.B.065.pdf](#)
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 [EAP NPA 2011-20 \(B.II\) AMC2-ADR-OPS.B.075.pdf](#)
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 [UAF NPA 2011-20 \(B.II\) AMC-ADR-OPS.B.080.pdf](#)
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 [LRH NPA 2011-20 \(B.II\) AMC-ADR-OPS.B.085.pdf](#)
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 [UAF NPA 2011-20 \(B.II\) AMC-ADR-OPS.C.005.pdf](#)
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 [EAP NPA 2011-20 \(B.II\) AMC-ADR-OPS.C.005.pdf](#)
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Attachment #208 to comment [#1805](#)

 [ADBM NPA 2011-20 B.II AMC-ADR-OPS.C.005.pdf](#)
Attachment #209 to comment [#1858](#)

**COMMENT RESPONSE DOCUMENT (CRD)
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2011-20 (B.II)**

***'Authority, Organisation and Operations Requirements for
Aerodromes'***

CRD to NPA 2011-20 (B.II) – Draft AMC/GM

RESULTING TEXT



**COMMENT RESPONSE DOCUMENT (CRD)
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2011-20 (B.II)**

'Authority, Organisation and Operations Requirements for Aerodromes'

(B.II) CRD to NPA 2011-20 (B.II) — Draft AMC/GM

Terminology

'Guidance Material' (GM) means non-binding material developed by the Agency that helps to illustrate the meaning of a requirement or specification, and is used to support the interpretation of the Basic Regulation, its Implementing Rules, and AMC.

GM to Regulation XXX

GM1 Article 8 Safeguarding of aerodrome surroundings

Other surfaces associated with the aerodrome are surfaces that need to be established when operating in accordance with ICAO PANS-OPS Doc 8168, Volume II, or its equivalent in the national law, when applicable. The term 'surfaces' in this meaning is not used uniformly in different sources of information where also terms 'area' or 'zone' may be used.

AMC/GM to ANNEX I – Part Authority Requirements (Part-AR)

SUBPART A –GENERAL REQUIREMENTS (ADR.AR.A)

GM1 ADR.AR.A.010(b) Oversight documentation

AVAILABILITY OF DOCUMENTATION TO THIRD PARTIES

The legislative acts, standards, rules, technical publications, and similar documents can be made available, in a timely manner, to the aerodrome operators and any other interested party in various ways and formats, such as via its website, the government's official gazette, or any other similar means.

The way for making such material available, including possible application of fees, is for the Competent Authority to decide.

Making such documentation available is without prejudice to the application of rules regarding protection of intellectual property rights, or similar applicable legislation.

AMC1 ADR.AR.A.015(d)(3) Means of compliance

GENERAL

The information to be provided to other Member States following approval of an alternative means of compliance should contain a reference to the Acceptable Means of Compliance (AMC) to which such means of compliance provides an alternative, as well as a reference to the corresponding Implementing Rule, indicating as applicable the subparagraph(s) covered by the alternative means of compliance.

GM1 ADR.AR.A.015 Means of compliance

GENERAL

Alternative means of compliance used by a Competent Authority or by organisations under its oversight may be used by other competent authorities or organisations only if processed again in accordance with ADR.AR.A.015 (d) and (e).

AMC1 ADR.AR.A.25(b) Information to the Agency

SAFETY SIGNIFICANT INFORMATION

(to be provided at a later stage)

AMC1 ADR.AR.A.030(d) Immediate reaction to a safety problem

NOTIFICATION OF MEASURES

When the Competent Authority directs a measure to a provider of apron management services, these measures should also be notified to the aerodrome operator.

GM1 ADR.AR.A.040(b) Safety Directives

FORWARDING OF SAFETY DIRECTIVES

The safety directives that should be forwarded to the Agency under ADR.AR.A.040 include, but are not limited to, cases like the following ones, where the Competent Authority has determined:

- (a) that it is necessary to include additional certification specifications in the certification basis of an aerodrome;
- (b) that aerodrome equipment has presented unusual, or frequent, or otherwise unjustified malfunctions or failures;
- (c) that the certification specifications established by the Agency are such that under given conditions additional action is required to be undertaken in order to maintain the level of safety;
- (d) that there is immediate need to take certain action in order to respond to a safety recommendation or following an accident or serious incident; or
- (e) that this or a similar unsafe condition may be present at other aerodromes of the same Member State.

Member States' competent authorities may issue directives (which may be called operational directives, or otherwise) during its oversight activities, such as an instruction to the aerodrome operator to abstain from a certain activity, or a positive action (e.g. cutting of trees which are found to penetrate the OLS, or the removal of certain object from the aerodrome etc.) needed to maintain the level of safety. Such directives are not meant to be forwarded to the Agency.

SUBPART B – MANAGEMENT (ADR.AR.B)

AMC1 ADR.AR.B.005(a) Management system

GENERAL

- (a) The following should be considered when deciding upon the required organisational structure:
- (1) the number of certificates and approvals to be issued;
 - (2) the number of declared organisations;
 - (3) the number and complexity of aerodromes, aerodrome operators, and providers of apron management services within that Member State;
 - (4) the possible allocation of tasks to third natural or legal persons of resources needed to fulfil the continuing oversight obligations;
 - (5) the level of civil aviation activity;
 - (6) the size of the Member State's aviation industry; and
 - (7) the potential growth of activities in the field of civil aviation.
- (b) The set-up of the organisational structure should ensure that carrying out the various tasks and obligations of the Competent Authority do not rely solely on individuals. That means that a continuous and undisturbed fulfilment of these tasks and obligations of the Competent Authority should also be guaranteed in case of illness, accident, or leave of individual employees.

GM1 ADR.AR.B.005(a) Management system

GENERAL

- (a) The Competent Authority designated by each Member State should be organised in such a way that:
- (1) there is specific and effective management authority in the conduct of all relevant activities;
 - (2) the functions and processes described in the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, and AMCs, CSs, and GM may be properly implemented;
 - (3) the Competent Authority's organisation and operating procedures for the implementation of the applicable requirements of the Regulation (EC) No 216/2008 and its Implementing Rules are properly documented and applied;
 - (4) all competent authority personnel involved in the related activities are provided with training where necessary;
 - (5) specific and effective provision is made for the communication and interface as necessary with the Agency and the competent authorities of other Member States; and
 - (6) all functions related to implementing the applicable requirements are adequately described.

- (b) A general policy, in respect of activities related to the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, including certification specifications, should be developed, promoted, and implemented by the manager at the highest appropriate level; for example the manager at the top of the functional area of the Competent Authority that is responsible for such activities.
- (c) Appropriate steps should be taken to ensure that the policy is known and understood by all personnel involved, and all necessary steps should be taken to implement and maintain the policy.
- (d) The general policy, whilst also satisfying additional national regulatory responsibilities, should in particular take into account:
 - (1) the provisions of Regulation (EC) No 216/2008;
 - (2) the provisions of the applicable Implementing Rules and their Acceptable Means of compliance, Certification Specifications, and Guidance Material;
 - (3) the needs of industry; and
 - (4) the needs of the Agency and of the Competent Authority.
- (e) The policy should define specific objectives for key elements of the organisation and processes for implementing related activities, including the corresponding control procedures and the measurement of the achieved standard.

AMC1 ADR.AR.B.005(a)(1) Management system

DOCUMENTED POLICIES AND PROCEDURES

- (a) The various elements of the organisation involved with the activities related to the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules should be documented in order to establish a reference source for the establishment and maintenance of this organisation.
- (b) The documented policies and procedures should be established in a way that facilitates their use. They should be clearly identified, kept up to date, and made readily available to all personnel involved in the relevant activities.
- (c) The documented policies and procedures should cover, as a minimum, the following aspects:
 - (1) policy and objectives;
 - (2) organisation structure;
 - (3) responsibilities and associated authority;
 - (4) processes and procedures;
 - (5) internal and external interfaces;
 - (6) internal control procedures;
 - (7) training of personnel;
 - (8) cross references to associated documents; and
 - (9) assistance from other competent authorities or the Agency (where required).
- (d) Except for smaller competent authorities, it is likely that the information is held in more than one document, or series of documents, and suitable cross-referencing should be

provided. For example, organisational structure and job descriptions are not usually in the same documentation as the policies and the detailed working procedures. In such cases, it is recommended that the documented procedures include an index of cross references to all such other related information, and the related documentation should be readily available when required.

GM1 ADR.AR.B.005(a)(1) Management system

DOCUMENTED POLICIES AND PROCEDURES

For the procedures meant here see also AMC1 ADR.AR.B.005(d).

AMC1 ADR.AR.B.005(a)(2) Management system

SCOPE AND DURATION OF INITIAL TRAINING OF AERODROME INSPECTORS

Initial training should encompass:

- (a) initial theoretical training;
- (b) practical training; and
- (c) on-the-job training.

(a) Initial theoretical training

The scope of the initial theoretical training is to familiarise the trainee aerodrome inspectors with the finding categorisation, reporting, follow-up procedures, and enforcement. The primary scope of the theoretical training is not the transfer of technical knowledge as the trainees should possess such knowledge, either from previous work experience or through specialised training, prior to attending the theoretical course (for areas of training see AMC3 ADR.AR.B.005(a)(2)). Amongst others, the theoretical training should cover theory of audits and inspections, as well as quality/safety assurance.

(b) Practical training

The scope of practical training is to instruct on audit/inspection techniques and specific areas of attention without interference with the operation of the aerodrome activities.

- (c) The Competent Authority should ensure that trainees have successfully completed the initial theoretical and practical training above by passing a relevant assessment.

(d) On-the-job training

The objective of the on-the-job training is to familiarise the trainees with the particularities of performing an aerodrome audit/inspection in a real, operational environment.

(1) Duration and conduct of the on-the-job training

The duration of the on-the-job training should be customised to the particular training needs of every trainee and cover, as much as possible, the audit/inspection items which the inspector will be privileged to inspect. The on-the-job training should include at least four aerodrome audits/ inspections.

(2) Elements to be covered during the on-the-job training

- (i) Preparation of an audit/inspection:
 - (A) sources of information for preparation of audit/inspection;
 - (B) areas of concern and/or open findings;
 - (C) selection of aerodrome operator(s) to be audited/inspected; and
 - (D) task allocation among members of the audit/inspection team.
- (ii) Administrative issues of the inspection:
 - (A) aerodrome inspector's credentials, rights, and obligations;
 - (B) aerodrome access procedures;
 - (C) safety and security airside procedures; and
 - (D) aerodrome inspector's toolkit (fluorescent vest, checklists, clinometer, distance measurement devices, digital camera, GPS, etc.).
- (iii) Audit/Inspection:
 - (A) introduction – opening meeting;
 - (B) on-site activities (audit/inspection according to the area of expertise of the trainee);
 - (C) findings (identification, categorisation, evidencing, reporting); and
 - (D) corrective actions – enforcement.
- (iv) Closing meeting – debriefing on the audit/inspection conclusions
- (v) Preparation, completion, and delivery of the audit/inspection report
- (vi) Human factors elements:
 - (A) cultural aspects;
 - (B) resolution of disagreements and/or conflicts; and
 - (C) auditee stress.
- (vii) Team leading if required
- (viii) Post-audit/inspection procedures, such as monitoring the status of open audit findings, follow-up audits/inspections, and closing the findings after appropriate action has been taken by the aerodrome operator.

(3) Assessment of trainee aerodrome inspectors

The assessment of the trainee should be done by the aerodrome inspector providing the training. A trainee should be considered to have successfully completed the on-the-job training only after demonstrating to the aerodrome inspector providing the training that he/she possesses the professional competence, knowledge, judgement, and ability to perform aerodrome inspections in an operational environment, in accordance with the applicable requirements.

(e) Aerodrome inspectors appointed to provide training and assessing trainees

The aerodrome inspectors providing the training, and assessing trainee aerodrome inspectors, should be appointed by the Competent Authority and should meet the qualification criteria established by that Competent Authority. These criteria should require that the appointee has been a qualified aerodrome inspector (see GM7

ADR.AR.B.005(a)(2), for the last three years prior to his/her appointment. Additional factors to be considered when nominating aerodrome inspectors to provide training, and assess trainee aerodrome inspectors include: knowledge of training techniques, professionalism, maturity, judgment, integrity, safety awareness, communication skills, and personal standards of performance.

AMC2 ADR.AR.B.005(a)(2) Management system

QUALIFICATION OF AERODROME INSPECTORS AFTER SUCCESSFUL COMPLETION OF TRAINING

- (a) Upon the successful completion of the initial training (initial theoretical training, practical training, and on-the-job training) the Competent Authority should issue a formal qualification statement for each qualified aerodrome inspector listing their privileges. Credentials should also be issued for the aerodrome inspectors, to facilitate their work.
- (b) The background knowledge and/or working experience of the aerodrome inspectors determines their privileges (the scope of their inspection; what they are entitled to inspect). The Competent Authority should determine what the inspector is entitled to inspect taking into account the following considerations:
 - (1) background knowledge; and
 - (2) working experience.
- (c) The inspecting authority should put in place a system that will ensure that their aerodrome inspectors meet at all times the qualification criteria with regard to the eligibility, training, and recent experience.

AMC3 ADR.AR.B.005(a)(2) Management System

TRAINING PROGRAMME AND RECURRENT TRAINING

- (a) The Competent Authority should establish a training programme for its personnel, including its aerodrome inspectors, and a plan for its implementation. The training programme should include, as appropriate to the role, current knowledge, experience and skills, of the personnel, at least the following:
- (1) aviation legislation, organisation, and structure;
 - (2) the Chicago Convention, relevant ICAO Annexes and documents, the applicable requirements of Regulation (EC) No 216/2008, its Implementing Rules and related Acceptable Means of Compliance, Certification Specifications and Guidance Material, as well as assessment methodology of the alternative means of compliance, and the applicable national legislation;
 - (3) the applicable requirements and procedures;
 - (4) areas of particular interest that include, but are not limited to:
 - (i) management systems, including safety management systems, safety assurance principles, and quality and security management systems as applied to aeronautical data and aeronautical information;
 - (ii) acceptability and auditing of safety managements systems;
 - (iii) change management;
 - (iv) aeronautical studies, safety assessments, and reporting techniques;
 - (v) human factors principles;
 - (vi) aerodrome design;
 - (vii) signs, markings, and lighting;
 - (viii) aerodrome maintenance;
 - (ix) aerodrome operations, including:
 - (A) aerodrome safeguarding, including obstacle assessment;
 - (B) rescue and firefighting;
 - (C) emergency planning;
 - (D) disabled aircraft removal;
 - (E) low visibility operations;
 - (F) adverse weather operations;
 - (G) wildlife management;
 - (H) apron management and apron safety management;
 - (I) handling of dangerous goods; and
 - (J) fuel, facilities, storage and handling;
 - (x) evaluation, approval, and review of aerodrome manuals;
 - (xi) other suitable technical training appropriate to the role and tasks of the personnel; and

- (xii) enforcement measures.
- (5) The training programme and plan should be updated, as needed, to reflect, at least, changes in aviation legislation, and industry. The training programme should also cover the specific needs of the personnel and the Competent Authority.
- (6) The Competent Authority should ensure that its personnel, including its aerodrome inspectors, undergo recurrent training at regular intervals defined by the Competent Authority or whenever deemed necessary, in order to be kept up to date.

GM1 ADR.AR.B.005(a)(2) Management system

AERODROME INSPECTORS – DUTIES

- (a) An aerodrome inspector is considered to be any person to whom the Competent Authority has formally assigned tasks related to the safety oversight of aerodromes.
- (b) Apart from the aerodrome oversight tasks, an aerodrome inspector may also undertake other tasks that the Competent Authority finds necessary.

GM2 ADR.AR.B.005(a)(2) Management system

AERODROME INSPECTORS – QUALIFICATION

To require a pilot licence as a prerequisite for aerodrome inspectors would be advantageous.

GM3 ADR.AR.B.005(a)(2) Management System

QUALIFICATION OF PERSONNEL

The term 'qualified' denotes fitness for the purpose. This may be achieved through fulfilment of the necessary conditions, such as completion of required training, or acquisition of a diploma or degree, or through the gaining of suitable experience. It also includes the ability, capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.

Certain posts may by nature be associated with the possession of certain qualifications in a specific field (e.g. rescue and firefighting, civil, mechanical, or electrical engineering, wildlife biology etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or European Union legislation.

GM4 ADR.AR.B.005(a)(2) Management system

QUALIFICATION AND TRAINING – GENERAL

- (a) To ensure personnel remain competent, arrangements should be made for initial and recurrent training as required.
- (b) With regard to sequence of particular components of initial training, the Competent Authority should ensure that on-the-job training is undertaken only by trainees that have successfully completed the initial theoretical and practical training.

- (c) The basic capability of the Competent Authority's personnel is a matter of recruitment, and normal management functions in selection of personnel for particular duties. Moreover, the Competent Authority should provide training in the basic skills, as required for those duties. However, to avoid differences in understanding and interpretation, it is considered important that all personnel be provided with further training specifically related to the applicable requirements of Regulation (EC) No 216/2008, its Implementing Rules and related AMC, CS, and GM, as well as related to the assessment of alternative means of compliance.
- (d) The Competent Authority may provide training through its own training organisation with qualified trainers or through another qualified training source (e.g. training provided by other competent authorities or the Agency).
- (e) When training is not provided through an internal training organisation, adequately experienced and qualified persons may act as trainers, provided their training skills have been assessed. If required, an individual training plan should be established covering specific training skills. Records should be kept of such training and of the assessment, as appropriate.

GM5 ADR.AR.B.005(a)(2) Management System

SUFFICIENT PERSONNEL

- (a) This Guidance Material for the determination of the required personnel is limited to the performance of certification and oversight tasks, excluding personnel required to perform tasks subject to any national regulatory requirements.
- (b) The elements to be considered when determining required personnel and planning their availability, may be divided into quantitative and qualitative elements:
 - (1) Quantitative elements:
 - (i) the number of initial certificates to be issued;
 - (ii) the number of aerodromes and aerodrome operators certified by the Competent Authority;
 - (iii) the number of providers of apron management services having declared their activity to the Competent Authority;
 - (iv) the number of planned aerodrome audits and inspections; and
 - (v) the number of expected changes to the aerodrome infrastructure.
 - (2) Qualitative elements:
 - (i) the size, nature, and complexity of activities of aerodromes and aerodrome operators, as well as providers of apron management services:
 - (A) privileges of the aerodrome operator;
 - (B) type of approval, scope of approval;
 - (C) possible certification to industry standards;
 - (D) types of aerodromes operated;
 - (E) number of personnel; and
 - (F) organisational structure, existence of subsidiaries.

- (ii) results of past oversight activities, including audits, inspections, and reviews, in terms of risks and regulatory compliance:
 - (A) number and level of findings; and
 - (B) implementation of corrective actions.
 - (iii) the size of the Member State's aviation industry, and the potential growth of activities in the field of civil aviation, which may be an indication of the number of new applications and changes to existing certificates to be expected.
- (c) Based on existing data from previous oversight planning cycles, and taking into account the situation within the Member State's aviation industry, the Competent Authority may estimate:
- (1) the standard working time required for processing applications for new certificates;
 - (2) the standard working time required for processing declarations;
 - (3) the number of new declarations, or changed declarations;
 - (4) the number of new certificates to be issued for each planning period; and
 - (5) the number of changes to existing certificates to be processed for each planning period.
- (d) In line with the Competent Authority's oversight policy, the following planning data should be determined specifically for each aerodrome and aerodrome operator, as well as for declared providers of apron management services:
- (1) standard number of audits/inspections to be performed per oversight planning cycle;
 - (2) standard duration of each audit/inspection;
 - (3) standard working time for audit/inspection preparation, on-site audit/inspection, reporting and follow-up, per aerodrome inspector; and
 - (4) minimum number and required qualification of aerodrome inspectors for each audit/inspection.
- (e) Standard working time could be expressed either in working hours per aerodrome inspector, or in working days per aerodrome inspector. All planning calculations should, then, be based on the same unit (hours or working days).
- (f) It is recommended to use a spread sheet application to process data defined under (c) and (d) above, to assist in determining the total number of working hours/days per oversight planning cycle required for certification, oversight, and enforcement activities. This application could also serve as a basis for implementing a system for planning the availability of personnel.
- (g) For each aerodrome, aerodrome operator, and provider of apron management services, the number of working hours/days per planning period for each qualified aerodrome inspector that may be allocated for certification, oversight and enforcement activities should be determined, taking into account:
- (1) purely administrative tasks not directly related to oversight and certification;
 - (2) training;
 - (3) participation in other projects;

- (4) planned absence; and
- (5) the need to include a reserve for unplanned tasks or unforeseeable events.
- (h) The determination of working time available for certification, oversight, and enforcement activities should also consider the possible use of qualified entities.
- (i) Based on the elements listed above, the Competent Authority should be able to:
 - (1) monitor dates when audits and inspections are due, and when they have been carried out;
 - (2) implement a system to plan the availability of its personnel; and
 - (3) identify possible gaps between the number and qualification of its personnel, and the required volume of certification and oversight.

Care should be taken to keep planning data up to date, in line with changes in the underlying planning assumptions, with particular focus on risk-based oversight principles.

GM6 ADR.AR.B.005(a)(2) Management System

TRAINING PROGRAMME AND RECURRENT TRAINING

When preparing the training programme, the Competent Authority should determine the areas for which the training may include realistic training elements.

As an example, the RFFS training could include parts of, or be the same with that of an aerodrome operator's RFFS personnel. If an aerodrome operator provides such training, care should be taken to avoid any possible conflict of interest.

GM7 ADR.AR.B.005(a)(2) Management system

RECENT EXPERIENCE REQUIREMENTS FOR AERODROME INSPECTORS

- (a) An aerodrome inspector will remain qualified if he/she performs a minimum number of two aerodrome audits/inspections during the previous 12 months. In case the minimum number of audits/inspections are not achieved due to the number of aerodromes in a Member State, audits/inspections conducted on other aerodromes which are open to public use, and which, however, do not fall within the scope of Regulation (EC) No 216/2008, may also be taken into account.
- (b) If an aerodrome inspector loses his/her qualification as a result of not reaching the minimum number of inspections mentioned in paragraph (a), he/she may be re-qualified by the Competent Authority by performing the number of the missed audits/inspections under the supervision of a qualified aerodrome inspector. The missed audits/inspections should take place within a maximum period of three months following the end of the period within which he/she should have reached the minimum number of audits/inspections.
- (c) If an aerodrome inspector loses his/her qualification because he/she has not been engaged in performing audits/inspections for a period longer than that established in paragraph (a) but less than 24 months, he/she should be re-qualified by the Competent Authority only after successfully completing the on-the-job-training, and any recurrent training required.

- (d) If an aerodrome inspector loses his/her qualification because he/she has not been engaged in performing audits/inspections for more than 24 months, he/she should be fully re-qualified by the Competent Authority only after successfully completing initial theoretical, practical, and on-the-job training.

GM1 ADR.AR.B.005(a)(3) Management system

FACILITIES AND OFFICE ACCOMODATION

Facilities and office accommodation include but are not limited to:

- (a) adequate offices;
- (b) a technical library available for the competent authority personnel, or another method to ensure receipt, control, and distribution of necessary technical documentation;
- (c) office equipment, including computers and communication means;
- (d) transportation means;
- (e) personnel protective equipment; and
- (f) equipment necessary for auditing/inspecting the aerodrome and its facilities, such as cameras, clinometers, distance measurement devices, GPS etc.

AMC1 ADR.AR.B.005(a)(4) Management system

COMPLIANCE MONITORING MECHANISM

The mechanism to monitor compliance of the management system with the relevant requirements, and the adequacy of the procedures should:

- (a) include a feedback system of audit findings to ensure implementation of corrective actions as necessary; and
- (b) be the responsibility of a person, or group of persons who should be responsible to the senior management of the Competent Authority and who act independently of other managers within the organisation, and with direct access to the senior management of the Competent Authority and to appropriate management for safety matters.

AMC1 ADR.AR.B.005(c) Management System

COORDINATION WITH OTHER AUTHORITIES OF THE MEMBER STATE

The Competent Authority should establish coordination arrangements with other authorities of the Member State. Such coordination arrangements should, in particular, include the following authorities:

- (a) security agencies, in order to ensure:
 - (1) international civil aviation security measures are integrated into the design and construction of aerodromes, and their facilities; and
 - (2) the optimisation of civil aviation security measures.
- (b) environmental protection authorities, for the management of conflicts between safety and environmental requirements;
- (c) local planning and land use authorities.

AMC1 ADR.AR.B.005(d) Management system

PROCEDURES AVAILABLE TO THE AGENCY

- (a) Copies of the procedures in the Competent Authority's management system should be made available to the Agency for the purpose of standardisation. These should include any amendments to the procedures. The procedures should provide, at least, the following information:
 - (1) regarding continuing oversight functions undertaken by the Competent Authority, the Competent Authority's organisational structure with description of the main processes. This information should demonstrate the allocation of responsibilities within the Competent Authority, and that the Competent Authority is capable of carrying out the full range of tasks regarding the size and complexity of the Member State's aerodrome industry. It should, also, consider overall proficiency and authorisation scope of Competent Authority personnel;
 - (2) changes which significantly affect the Competent Authority's oversight capabilities;
 - (3) for personnel involved in oversight activities, the minimum professional qualification requirements and experience, and principles guiding appointment (e.g. assessment);
 - (4) how the following are carried out: assessing applications and evaluating compliance, issuance of certificates, performance of continuing oversight, follow-up of findings, enforcement measures, and resolution of safety concerns;
 - (5) principles of managing exemptions, derogations, cases of equivalent level of safety, and special conditions;
 - (6) systems used to disseminate applicable safety information for timely reaction to a safety problem;
 - (7) criteria for planning continuing oversight (oversight programme), including adequate management of interfaces when conducting continuing oversight (aerodrome operations and ATS operations for example); and
 - (8) outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for continuation training of oversight personnel.

- (b) The requirements of particular domains defined within the copy of the procedures of the Competent Authority's management system (and amendments) should be considered.
- (c) As part of the continuous monitoring of a Competent Authority, the Agency may request details of the working methods used, in addition to the copy of the procedures of the Competent Authority's management system (and amendments). These additional details are the procedures and related Guidance Material describing working methods for Competent Authority personnel conducting oversight.
- (d) Information related to the Competent Authority's management system may be submitted in electronic format.

GM2 ADR.AR.B.0010(a)(1) Allocation of tasks to qualified entities

CERTIFICATION TASKS

The tasks that may be performed by a qualified entity on behalf of the competent authority include those related to the initial certification, and continuing oversight of aerodromes, their operators, or providers, or apron management services as defined in this Regulation, with the exclusion of the issuance of certificates or approvals.

AMC2 ADR.AR.B.010(a)(1) Allocation of tasks to qualified entities

QUALIFICATIONS OF PERSONNEL

- (a) A qualified entity, to which tasks related to the initial certification or continuing oversight tasks are to be allocated, should have an adequate number of qualified technical personnel to conduct aerodrome inspections and audits, and to perform any other task needed during the certification and oversight process, as required by the Competent Authority.
- (b) The personnel of a qualified entity, to whom such tasks are allocated, should meet the qualification criteria applicable for competent authorities' aerodrome inspectors prescribed in AMC1 ADR.AR.B.005(a)(2), AMC2 ADR.AR.B.005(a)(2), and AMC3 ADR.AR.B.005(a)(2), (see also GM7 ADR.AR.B.005(a)(2)).

GM1 ADR.AR.B.010 Allocation of tasks to qualified entities

CERTIFICATION TASKS

The tasks that may be performed by qualified entities on behalf of the Competent Authority may include any tasks related to the initial certification and continuing oversight of aerodromes and aerodrome operators, as well as declared providers of apron management services, with the exclusion of the issuance of certificates or approvals.

AMC1 ADR.AR.B.020(a) Record-keeping

GENERAL

- (a) The record-keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a consistent way that ensures traceability and retrievability throughout the required retention period.

- (b) Records should be kept in paper form, or in electronic format, or a combination of both media. Records stored on microfilm or optical disc form are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period starts when the record has been created or last amended.
- (c) Computer systems should have, at least, one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against unauthorised alteration of data.
- (d) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data, and in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken that all necessary data continue to be accessible, at least, through the full period specified in ADR.AR.B.020(c) and (d).

AMC1 ADR.AR.B.020(a)(1);(a)(2);(a)(3) Record-keeping

COMPETENT AUTHORITY MANAGEMENT SYSTEM

Records related to the Competent Authority's management system should include, as a minimum, and as applicable:

- (a) the documented policies and procedures;
- (b) the personnel files of Competent Authority personnel, with supporting documents related to their training and qualifications;
- (c) the results of the Competent Authority's internal compliance monitoring and risk assessment, including audit findings and corrective actions; and
- (d) the contract(s) established with qualified entities to whom tasks have been allocated regarding certification or oversight tasks on behalf of the Competent Authority.

AMC1 ADR.AR.B.020(d) Record keeping

DURATION OF RETENTION PERIOD OF RECORDS

Records related to the training and qualification of the personnel of the Competent Authority should be kept until the end of their employment.

AMC1 ADR.AR.B.020(a)(4);(a)(5) Record keeping

AERODROMES — AERODROME OPERATORS — APRON MANAGEMENT SERVICE PROVIDERS

Records related to a certified aerodrome and its aerodrome operator, or the provider of apron management services having declared its activity to the Competent Authority should include, as appropriate to the type of organisation:

- (a) the application for a certificate, approval, or declaration;
- (b) the documentation based upon which:
 - (1) the certificate or an approval has been granted with amendments; and
 - (2) the declaration has been registered;

- (c) the documentation related to notifications of changes by the applicant and their assessment;
- (d) the certificate or approval issued, including any changes;
- (e) a copy of the continuing oversight programme listing the dates when audits are due and when such audits were carried out;
- (f) continuing oversight records, including all audit and inspection records;
- (g) copies of all relevant correspondence;
- (h) details of any exemption or derogation, and enforcement actions;
- (i) any report from other competent authorities relating to the oversight of the aerodrome, the aerodrome operator, and the provider of apron management services, if applicable; and
- (j) a copy of any other document approved by the Competent Authority.

AMC1 ADR.AR.B.020(c)(1) Record keeping

AERODROMES — AERODROME OPERATORS — PROVIDERS OF APRON MANAGEMENT SERVICES

- (a) Records which are considered to be related to the certification of an aerodrome, and to be maintained for the lifespan of the certificate include, but are not limited to, the following:
 - (1) applications submitted;
 - (2) notifications of the Certification Specifications for an initial certification and any changes thereof, including:
 - (i) any provisions for which an equivalent level of safety has been accepted; and
 - (ii) any special conditions.
 - (3) documentation related to alternative means of compliance used;
 - (4) documentation related to Deviation Acceptance and Action Documents(DAAD) if relevant;
 - (5) documentation related to exemptions or derogations granted;
 - (6) aeronautical studies and safety assessments;
 - (7) designs of the aerodrome;
 - (8) declarations made by the applicant;
 - (9) current version of an aerodrome manual, and evidence of its evaluation; and
 - (10) approvals granted.
- (b) Records for aerodrome equipment, or parts of the aerodrome infrastructure which have been removed from the aerodrome need not be maintained.
- (c) For providers of apron management services, records include, but may not be limited to, the declarations, and the relevant documentation submitted by the providers.

GM1 ADR.AR.B.020 Record keeping

GENERAL

Records are required to document results achieved, or to provide evidence of activities performed. Records become factual when recorded. Therefore, they are not subject to version control. Even when a new record is produced covering the same issue, the previous record remains valid.

GM1 ADR.AR.B.020(a) Record keeping

MICROFILM AND OPTICAL STORAGE

Microfilming or optical storage of records may be carried out at any time. The records should be as legible as the original record, and remain so for the required retention period.

GM2 ADR.AR.B.020(a) Record keeping

AERODROMES — AERODROME OPERATORS — DOCUMENTATION

Documentation to be kept as records in support of the certificate or approval includes the management system documentation, including any technical manuals, such as the aerodrome manual, that have been submitted with the initial application, and any amendments to these documents.

SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C)**AMC1 ADR.AR.C.005 Oversight**

GENERAL

- (a) The Competent Authority should assess the aerodrome operator, and monitor its continued competence to conduct safe operations in compliance with the applicable requirements and the certification basis. Similarly, the Competent Authority should monitor the continued competence of providers of apron management services. The Competent Authority should ensure that accountability for assessing and monitoring aerodrome operators, as well as providers apron management services, is clearly defined. This accountability may be delegated or shared, in whole or in part.
- (b) It is essential that the Competent Authority has the full capability to adequately assess the continued competence of an aerodrome operator, or a provider of apron management services by ensuring that the whole range of activities is assessed by appropriately qualified personnel.

GM1 ADR.AR.C.005 Oversight

GENERAL

- (a) Responsibility for the safe operation of an aerodrome lies with the aerodrome operator. Under these provisions, a positive move is made towards devolving upon the aerodrome operator a share of the responsibility for monitoring the safety of operations. The objective cannot be attained unless aerodrome operators are prepared to accept the implications of this policy, including that of committing the necessary resources to its implementation. Crucial to success of the policy is the content of Part-ADR.OR which requires the establishment of a management system by the aerodrome operator.
- (b) The Competent Authority should continue to assess the aerodrome operator's compliance with the applicable requirements, including the effectiveness of its management system. If the management system is judged to have failed in its effectiveness, then this in itself is a breach of the requirements which may, among others, call into question the validity of the certificate.
- (c) The accountable manager is accountable to the Competent Authority as well as to those who may appoint him/her. It follows that the Competent Authority cannot accept a situation in which the accountable manager is denied sufficient funds, manpower, or influence to rectify deficiencies identified by the management system.

AMC1 ADR.AR.C.010(a) Oversight programme

AUDITS, INSPECTIONS AND OVERSIGHT PROCEDURES

- (a) Each aerodrome operator, and each declared provider of apron management services should have an appropriate focal point specifically assigned to it in the Competent Authority. Where more than one aerodrome inspector is assigned to an aerodrome operator, one of them should be nominated as having overall responsibility for supervision of, and liaison with the aerodrome operator's management, and be responsible for reporting on compliance with the requirements for its operations as a whole.

SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C)

- (b) Inspections, audits, and oversight procedures, on a scale and frequency appropriate to the operation, should include, but not be limited to, items from the following list:
- (1) aerodrome infrastructure and equipment;
 - (2) visual aids and aerodrome electrical systems;
 - (3) obstacle restriction and control;
 - (4) aerodrome data reporting ;
 - (5) aerodrome emergency planning;
 - (6) rescue and firefighting;
 - (7) removal of disabled aircraft;
 - (8) storage facilities and handling of dangerous goods and fuel, including fuel installations, fuel quality, and fuelling equipment;
 - (9) low visibility operations;
 - (10) winter and adverse weather operations;
 - (11) protection of radar, navigation aids, and other aerodrome equipment;
 - (12) apron management;
 - (13) apron safety management;
 - (14) vehicle control on the movement area;
 - (15) wildlife hazard management;
 - (16) inspections of the movement area;
 - (17) maintenance of the aerodrome systems and the movement area;
 - (18) aerodrome works;
 - (19) protection against hazardous activities in the vicinity of the aerodrome;
 - (20) personnel training and records;
 - (21) aerodrome manuals and documentation;
 - (22) operator's management system, including its safety management system and its quality, and security management system for aeronautical data; and
 - (23) operator's oversight of the compliance of the organisations operating, or providing services at the aerodrome (third parties).
- (c) An inspection or an audit should be a 'deep cut' through the items selected, and all findings and observations should be recorded.
- (d) Aerodrome inspectors should analyse and assess the root cause(s) identified by the aerodrome operator, and be satisfied that the corrective actions taken are adequate to correct the non-compliance, and to prevent reoccurrence.
- (e) Inspections and audits may be conducted separately or in combination. Inspections and audits may also be coordinated with inspections and audits conducted by the competent authorities responsible for other areas, to address areas of coordination between aerodrome operator and the providers of other services (e.g. ATM/ANS). Inspections may, at the discretion of the Competent Authority, be conducted with or without prior notice to the aerodrome operator, or the provider of apron management services. Unannounced inspections should not disrupt fluent and safe operations of the aerodrome.

- (f) Where it is apparent to an aerodrome inspector that an aerodrome operator, or a provider of apron management services has permitted a breach of the applicable requirements, with the result that safety has been, or might have been compromised, the inspector should ensure that the responsible person within the Competent Authority is informed without delay.
- (g) In the first few months of a new operation, physical change of the aerodrome or organisational restructure, aerodrome inspectors should be particularly alert to any irregular procedures, evidence of inadequate facilities or equipment, or indications that management control of the operation may be ineffective.

Aerodrome inspectors should take account of any conditions that may indicate a significant deterioration in the operator's financial situation. When any financial difficulties are identified, aerodrome inspectors should increase technical surveillance of the operation with particular emphasis on the upholding of safety standards.

- (h) The number or the magnitude of the non-compliances identified by the Competent Authority will serve to support the Competent Authority's continuing confidence in the aerodrome operator's, or the of apron management services provider's competence, or, alternatively, may lead to an erosion of that confidence. In the latter case, the Competent Authority will need to review any identifiable shortcomings of the management system, and take appropriate action if required.

AMC1 ADR.AR.C.010(b) to (e) Oversight programme

OVERSIGHT PLANNING CYCLE

- (a) The safety performance should be continuously monitored in order to ensure that the oversight programme and the applicable oversight planning cycle remain appropriate.
- (b) The oversight planning cycle and related oversight programme for each aerodrome operator should be reviewed annually.
- (c) The oversight planning cycle and related oversight programme, and their annual review should be determined according to the following elements:
 - (1) the results of past certification and oversight activities;
 - (2) capability to effectively identify aviation safety hazards, and manage the associated risks;
 - (3) effective control over all changes in accordance with ADR.OR.B.040;
 - (4) absence of level 1 findings;
 - (5) response time to implement corrective actions requested by the Competent Authority in accordance with ADR.AR.C.055(d)(2); and
 - (6) risk exposure related to the aerodrome operated, such as traffic volume, type of aircraft or physical characteristics of the aerodrome.
- (d) During each oversight planning cycle, the competent authority should convene meetings with the accountable manager of the aerodrome operator, or his/her delegate.

AMC1 ADR.C.010(b) Oversight programme

OVERSIGHT PLANNING CYCLE

- (a) For each aerodrome operator certified by the Competent Authority all processes should be audited at periods not exceeding the applicable oversight planning cycle. The beginning of the first oversight planning cycle is normally determined by the date of issue of the first certificate. If the Competent Authority wishes to align the oversight planning cycle with the calendar year, it should shorten the first oversight planning cycle accordingly.
- (b) The interval between two audits for a particular process should not exceed the interval of the applicable oversight planning cycle.
- (c) Audits should include at least one on-site audit within each oversight planning cycle at each aerodrome.

AMC2 ADR.AR.C.010(b) Oversight programme

AUDIT

- (a) The oversight programme should indicate which aspects will be covered with each audit.
- (b) Part of an audit should concentrate on the aerodrome operator's compliance monitoring reports to determine if the aerodrome operator is identifying the root causes and correcting its problems.
- (c) At the conclusion of the audit, an audit report should be completed by the auditing aerodrome inspector, including all findings raised.

GM1 ADR.AR.C.010(b);(c) Oversight programme

INDUSTRY STANDARDS

- (a) For aerodrome operators having demonstrated compliance with industry standards, the Competent Authority may adapt its oversight programme in order to avoid duplication of audits.
- (b) Demonstrated compliance with industry standards may not be considered in isolation from the other elements to be considered for the Competent Authority's risk-based oversight.
- (c) In order to be able to credit any audits performed as part of certification in accordance with industry standards, the following should be considered:
 - (1) the demonstration of compliance is based on certification auditing schemes providing for independent and systematic verification;
 - (2) the existence of an accreditation scheme and accreditation body for certification in accordance with the industry standards has been verified;
 - (3) certification audits are relevant to the requirements defined in Part-ADR.OR, Part ADR.OPS, or other regulations as applicable;
 - (4) the scope of such certification audits can easily be mapped against the scope of oversight;
 - (5) audit results are accessible to the Competent Authority; and

- (6) the audit planning intervals are compatible with the oversight planning cycle.

GM2 ADR.AR.C.010(b) Oversight programme

AUDITS, INSPECTIONS AND OVERSIGHT PROCEDURES

Examples of trends which may indicate problems in a new aerodrome operator's financial situation could be:

- (1) significant lay-offs or turnover of personnel; reduced staff resource; increased multi-tasking; changing shift patterns; and increased overtime;
- (2) delays in meeting payroll;
- (3) reduction of safe operating standards;
- (4) decreasing standards of training;
- (5) withdrawal of credit by suppliers;
- (6) inadequate maintenance of the aerodrome; and
- (7) shortage of supplies and spare parts.

GM3 ADR.AR.C.010(b) Oversight programme

AUDITS, INSPECTIONS AND OVERSIGHT PROCEDURES

Normally the inspections that are carried out by the Competent Authority should be with prior notice to the aerodrome operator or the provider apron management services.

Such notice should be given in writing, and in good time before the inspection so that the inspected entity can make all the necessary arrangements and preparations, and to avoid the disruption of normal operations.

In case an inspection is conducted without prior notice (unannounced inspection), the aerodrome inspectors should ensure that the operations are affected to the minimum extent possible.

AMC2 ADR.AR.C.015(a) Initiation of the certification process

PROCESSING OF APPLICATION

Upon receipt of an application, the Competent Authority should acknowledge receipt of that application, in writing, within the period defined in the applicable national legislation.

If the Competent Authority foresees a delay in processing the application, it should notify the applicant as soon as possible, and within the period defined in the applicable national legislation.

The Competent Authority should respond to any request made by the applicant within the period defined in the applicable national legislation.

If an applicant fails to submit all necessary documentation, the Competent Authority should inform him/her in writing, within the period defined in the applicable national legislation.

AMC1 ADR.AR.C.015(b)(1);(2) Initiation of the certification process

NOTIFICATION OF CERTIFICATION BASIS

- (a) Upon receipt of the application, the Competent Authority should examine and assess the content of the application and the related documentation, including the proposed Certification Specifications and any provisions for which compliance is proposed to be demonstrated in a different way that provides for an equivalent level of safety. (See also paragraph 1 (a) of AMC1 ADR.AR.C.035(a);(b)).
- (b) The Competent Authority should establish the certification basis of the aerodrome, which should include:
 - (1) all Certification Specifications that it finds applicable to the aerodrome design and operation;
 - (2) any provision for which the Competent Authority is satisfied with the proposal, and accepts the applicant to demonstrate an equivalent level of safety (ELOS) based on its application; and
 - (3) any special condition prescribed in accordance with ADR.AR.C.025, that the Competent Authority finds necessary to be included in the certification basis.
- (c) The Competent Authority should document and notify the applicant of:
 - (1) the certification basis as established in paragraph (b) above; and
 - (2) any change thereto, as a result of Certification Specifications which became effective after the notification of the certification basis and which the applicant decided to comply with, or that the Competent Authority has found necessary to be complied with, or design changes made, compliance demonstration results, new special conditions that the Competent Authority considers necessary, etc.
- (d) In addition, the Competent Authority should assess the documentation demonstrating the way the applicant is proposing to comply with the applicable requirements of the Regulation (EC) 216/2008, Part-ADR.OR, and Part-ADR.OPS, and any other applicable requirements that are matching the aerodrome design and its operation.
- (e) When notifying the applicant in accordance with paragraph (c), the Competent Authority should also inform him/her of the right of appeal, as exists under the applicable national legislation.

AMC1 ADR.AR.C.015(b)(1) Initiation of the certification process

NOTIFICATION OF CERTIFICATION BASIS — DETERMINATION OF ELEVATION OF AERONAUTICAL BEACONS

If such beacons are operationally necessary, the Competent Authority should ensure that the elevation which is sufficient for the vertical light distribution of an aerodrome beacon or an identification beacon, as described in CS ADR-DSN.M.620, is determined.

GM1 ADR.AR.C.015(c) Initiation of the certification process

CERTIFICATION OF EXISTING AERODROMES

The certification period of an existing aerodrome should not exceed 18 months from the filing of the application by the applicant to the granting of the certificate.

GM1 ADR.AR.C.015 Initiation of the certification process

INITIAL INTEREST

Prior to initiating the application process for a certificate, the Competent Authority should arrange for a meeting with the applicant.

During this meeting, the applicant should present to the authority its plans with regard to the aerodrome. The applicant should also make arrangements so that its key personnel are present during this meeting.

In addition, during this meeting, the Competent Authority should provide general information to the applicant about the applicable requirements for the aerodrome. It should also provide copies of the applicable requirements, application forms, and any other relevant documentation, and describe the procedures that are followed during the certification process.

Such information to be provided by the Competent Authority may also include information about approvals, permits, or clearances that the applicant may need to obtain from other competent authorities (such as security or environmental protection competent authorities, local planning authorities, etc.) of the Member State prior or during the certification process.

The Competent Authority should make arrangements so that representatives of all involved entities of the Competent Authority(ies) are present during this meeting.

GM1 ADR.AR.C.015(b)(1);(2) Initiation of the certification process

CERTIFICATION BASIS – PROPOSALS FOR EQUIVALENT LEVEL OF SAFETY

When the Competent Authority assesses a proposal of an applicant who has requested to demonstrate an equivalent level of safety, the Competent Authority should pay, amongst others, particular attention to:

- (a) the identification of the intent of the Agency's Certification Specification(s) in question, and assess if the proposal satisfies that intent;
- (b) any possible interconnections/relationships between the Agency's Certification Specification(s) which the proposal is related to, with any other Certification Specifications or requirements, in order to:
 - (1) identify any implications of the proposal to other design, operational, human, or other elements of the system; and
 - (2) establish if such interconnections/relationships and implications have been properly and adequately addressed by the applicant.

The applicant's proposal may involve design, technical, procedural, or other suitable means.

The demonstration of an equivalent level of safety may involve various methodologies, quantitative or qualitative, whose magnitude and complexity may vary, depending on each case.

In any case, the applicant should demonstrate to the satisfaction of the Competent Authority that the proposed solution offers a level of safety, which is effectively not lower than that associated with the relevant Agency Certification Specification(s).

AMC1 ADR.AR.C.020 Certification Basis

EFFECTIVE CERTIFICATION SPECIFICATIONS

- (a) The Certification Specifications that the Competent Authority should use to establish and notify the certification basis to the applicant, should be those that were effective during the date of the application.
- (b) Notwithstanding paragraph (a) above, if at any point of the certification process the applicant requests to use Certification Specifications which came into force after the filing of his/her application, or the notification of the certification basis by the Competent Authority, then the Competent Authority should examine if it is necessary to also include in the certification basis other Certification Specifications, which also came into effect after the filling of the initial application and which are, in the opinion of the Competent Authority, directly related to those Certification Specifications that have been proposed by the applicant.
- (c) Notwithstanding paragraph (a) and (b) above, the Competent Authority may at any time, after the filing of the application, decide to include in the certification basis any Certification Specifications that it deems necessary.

GM1 ADR.AR.C.035(a) Issuance of certificate

EVALUATION OF SAFETY ASSESSEMENTS PROVIDED BY THE AERODROME OPERATOR AT THE INITIAL CERTIFICATION OR ACCOMPANYING A REQUEST FOR PRIOR APPROVAL OF A CHANGE IN ACCORDANCE WITH ADR.OR.B.040.

- (a) The Competent Authority should evaluate the conclusion of a submitted safety assessment provided by the aerodrome operator, to ensure compliance with the relevant requirement for the operator on how to assess changes under ADR.OR.B.040(f).
- (b) The Competent Authority should evaluate the safety assessment and, in particular, make sure that:
 - (1) the identified safety concern(s) has (have) have been assessed through the safety assessment process and is (are) adequately documented.
 - (2) an appropriate coordination has been performed between the parties affected by the safety concern(s);
 - (3) the assessment covers the whole system and the interactions of its elements;
 - (4) the hazards have been properly identified and the level of risk assessed;
 - (5) the proposed mitigation measures are adequate and consistent with the objective of reducing the identified level of risk and the safety objectives, if relevant;
 - (6) the timeframes of the planned implementation of the proposed associated actions are appropriate.
- (c) After its evaluation, the Competent Authority should either:
 - (1) agree to the proposed associated actions, such as mitigation measures; or
 - (2) coordinate with the aerodrome operator to reach an agreement on revised mitigation measures if some risks have been underestimated, or have not been identified; or
 - (3) impose additional measures, or reject the proposal if no agreement can be reached.

SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C)

- (d) The Competent Authority should define and undertake oversight actions that ensure that mitigation and/or additional measures are properly implemented so that the measures actually meet the risk reduction objectives, and that the planned timeframes are applied.
- (e) When necessary, the Competent Authority should require the aerodrome operator to promulgate appropriate information, for use by the aerodrome organisation, various stakeholders, and notably by the air navigation service providers and aircraft operators.

GM1 ADR.AR.C.035(b)(1) Issuance of certificate

MODEL FOR THE SINGLE CERTIFICATE

[MEMBER STATE]

A Member of the European Union¹

CERTIFICATE

Certificate reference: [STATE CODE]: xxxxx

Pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council and the Commission Regulation (EC) No .../... for the time being in force and subject to the conditions specified below, [THE COMPETENT AUTHORITY OF THE MEMBER STATE²] hereby certifies that:

[COMPANY NAME AND ADDRESS]

is authorised to operate aerodrome [NAME OF AERODROME], in accordance with the provisions of Regulation (EC) No 216/2008 and its Implementing Rules, the aerodrome certification basis, the terms of the certificate and the aerodrome manual.

This certificate shall remain valid for an unlimited duration, unless it is surrendered or revoked.

Date of original issue:.....

Revision No:.....

Signed:.....

For the Competent Authority[COMPETENT AUTHORITYIDENTIFICATION]

¹ Delete for non-EU Member States.

² Delete for non-EU Member States.

GM2 ADR.AR.C.035 (b) (2) Issuance of certificate

MODEL FOR THE TWO SEPARATE CERTIFICATES – (A) AERODROME OPERATOR CERTIFICATE

[MEMBER STATE]

A Member of the European Union³

AERODROME OPERATOR CERTIFICATE

Certificate reference: [STATE CODE]: xxxxx

Pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council and the Commission Regulation (EC) No .../... for the time being in force and subject to the conditions specified below, [THE COMPETENT AUTHORITY OF THE MEMBER STATE⁴] hereby certifies that:

[COMPANY NAME AND ADDRESS]

is authorised to operate aerodrome [NAME OF AERODROME(S)]⁵, in accordance with the provisions of Regulation (EC) No 216/2008 and its Implementing Rules, the aerodrome certification basis, the terms of the certificate attached to the aerodrome certificate and its aerodrome manual.

Apron management services are provided by [specify name of service provider].
This certificate shall remain valid for an unlimited duration, unless it is surrendered or revoked.

Date of original issue:.....

Revision No:.....

Signed:.....

For the Competent Authority[COMPETENT AUTHORITY IDENTIFICATION]

3 Delete for non-EU Member States.

4 Delete for non-EU Member States.

5 Delete as appropriate. If the operator operates more than one aerodrome, all aerodromes shall be listed.

MODEL FOR THE TWO SEPARATE CERTIFICATES – (B) AERODROME CERTIFICATE

[MEMBER STATE]

A Member of the European Union⁶

AERODROME CERTIFICATE

Certificate reference: [STATE CODE]: xxxxx

Pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council and the Commission Regulation (EC) No .../... for the time being in force and subject to the conditions specified below, [THE COMPETENT AUTHORITY OF THE MEMBER STATE] hereby certifies that:

[NAME OF AERODROME⁷]

is authorised to be operated as an aerodrome by [AERODROME OPERATOR COMPANY NAME AND ADDRESS], in accordance with the provisions of Regulation (EC) No 216/2008 and its Implementing Rules, the aerodrome certification basis, the terms of the certificate attached to this aerodrome certificate and the aerodrome manual.

This certificate shall remain valid for an unlimited duration, unless it is surrendered or revoked.

Date of original issue:.....

Revision No:.....

Signed:.....

For the Competent Authority [COMPETENT AUTHORITY IDENTIFICATION]

⁶ Delete for non-EU Member States.

⁷ Delete as appropriate.

GM3 ADR.AR.C.035(b)(1);(2) Issuance of certificate

MODEL FOR THE TERMS OF THE CERTIFICATE TO BE ATTACHED TO THE CERTIFICATE

TERMS OF THE CERTIFICATE	
Certificate reference: [STATE CODE] ¹:	
Aerodrome name – ICAO location indicator ²:	
Conditions to operate ³:	
Runway – declared distances ⁴:	
Types of approaches ⁵:	
Aerodrome Operating minima ⁶:	
Aerodrome reference code⁷:	
Scope of aircraft operations with a higher aerodrome reference code letter ⁸:	
Provision of apron management services ⁹:	
Rescue and firefighting level of protection ¹⁰:	
Other¹¹	

1. The certificate must be given the State Code [The two-letter ISO code should be used (ISO 3166 alpha-2), except for Greece and the United Kingdom, for which the abbreviations EL and UK are recommended] and a unique ascending number. Example: EL – 001

2. To be specified: the official name of the aerodrome and the ICAO location indicator for the aerodrome.

3. To be specified: day/ night and IFR/ VFR.

4. To be specified: ASDA, LDA, TODA, TORA in metres for each direction of each runway, including intersection take-off if applicable.

5. To be specified: approval of the runway for non-instrument, instrument, non-precision approach. In case of precision approach (-es) it is to be indicated, which of the following precision approach (-es) is (are) approved:

- Standard Category I;
- Lower than Standard Category I;
- Precision Approach Category II;
- Other than Standard Category II;
- Precision Approach Category III-A;
- Precision Approach Category III-B;
- Precision Approach Category III-C.

6. To be specified: the operating minima.

7. To be specified: Aerodrome Reference Code (Code number/Code letter).

8. To be specified: the approved operations of aeroplanes with a higher code letter than indicated in point 7 above.

9. To be specified: the name of service provider if such services are not provided by the aerodrome operator.

10. To be specified: the rescue and firefighting level of protection as per Annex III (PART-ADR.OPS) of this Regulation.

11. To be specified: any other information that the Competent Authority finds necessary to include.

AMC1 ADR.AR.C.035(c) Issuance of certificate

VERIFICATION OF COMPLIANCE

(a) Upon receipt of an application for a certificate, the Competent Authority should:

- (1) nominate an individual, to become the focal point for all aspects of the applicant's certification process, and to coordinate all necessary activities, including the Competent Authority's certification team. The nominated person should be responsible to the responsible person of the Competent Authority for confirming that all appropriate inspections and audits have been carried out. He/she should also ensure that the necessary prior approvals required are issued in due course;
- (2) verify if the application shows compliance with the applicable requirements. The Competent Authority should also arrange for the steps to be followed during the certification process. This would, normally, start with the demonstration of compliance of the aerodrome with the notified certification basis (see AMC1 ADR.AR.C.015(b);(1);(2)) which will require the conduct of technical inspections by the Competent Authority and/or examination of submitted documentation, the participation to demonstrations, or tests conducted by the applicant, as the case may be, and the Competent Authority determines appropriate. This should also include the cases where the certification basis includes provisions for which the Competent Authority has accepted the applicant to demonstrate an equivalent level of safety to, or cases of special conditions, as applicable;

AMC/GM to Annex I – Part-AR

SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C)

If the Competent Authority is not satisfied with the outcome of the demonstration process for any elements of the certification basis, it should notify the applicant in writing. At the end of this phase, the Competent Authority should have documented evidence that the aerodrome meets the notified certification basis;

- (3) review the aerodrome manual, which should be prepared in accordance with ADR.OR.D.005, and any other documentation provided by the applicant; and
 - (4) verify compliance with the applicable requirements of Part-ADR.OR, Part-ADR.OPS, as well as any other applicable requirement. When verifying compliance with such requirements, an audit should be conducted covering the following areas:
 - (i) compliance shown by the applicant with the applicable requirements of Part-ADR.OPS, or any other applicable requirements;
 - (ii) the applicant's management system and its organisation, including: detailed management structure, including names and qualifications of nominated personnel; adequacy of the organisation and management structure, including allocated resources and numbers of personnel allocated by the applicant to key management tasks and other positions. Care should be taken to verify that the system is comprehensive, and is likely to be effective. Of particular importance is a careful review of the qualifications of the applicant's nominated persons. Account should be taken of the relevance of the nominee's previous experience and known record;
 - (iii) safety management and compliance monitoring with applicable requirements;
 - (iv) documentation on which the certificate should be granted (organisation documentation as required by Part-ADR.OR, including technical manuals, such as the aerodrome manual etc.); and
 - (v) adequacy of facilities with regard to the applicant's scope of work.
 - (5) in case of non-compliance, the applicant should be informed, in writing, of the corrections or supplements which are required.
- (b) The Competent Authority should be satisfied with the demonstration of compliance of the aerodrome manual with the requirements referred to in ADR.OR.E.005 and the related AMCs.
 - (c) The Competent Authority should ensure that standardised and approved methods and tools are used by its personnel during the process described in paragraph a.
 - (d) In cases where an application for a certificate is refused, the applicant should be informed of the right of appeal existing under national regulations.
 - (e) Prior to issuing the certificate(s), the Competent Authority may require the conduct of one or more flights at the aerodrome, as well as any other test, or exercise it finds necessary.
 - (f) When the verification process is complete, the Competent Authority should issue the certificate(s) and ensure the publication of the certification status of the aerodrome in the aeronautical information publication (AIP) in section AD.1.5.

GM1 ADR.AR.C.035 Issuance of certificate

VERIFICATION OF COMPLIANCE

The technical inspections of the aerodrome should take place prior to the Competent Authority finding the I aerodrome manual satisfactory in accordance with ADR.OR.E.005.

AMC1 ADR.AR.C.035(a) Issuance of certificate

NOMINATED PERSONS

When an aerodrome operator submits the name of a nominee for the nominated persons mentioned in ADR.OR.D.015, the Competent Authority should assess his/her qualifications and may interview the nominee or call for additional evidence of his/her suitability before deciding upon his/her acceptability.

GM1 ADR.AR.C.035(a)(2) Issuance of certificate

NOMINATED PERSONS

Interview with the Accountable Manager, and other nominated persons mentioned in ADR.OR.D.015.

Possible cases where an interview/ meeting with nominated post holders may be necessary are amongst others:

- (a) start of operations before issuing a first certificate for an aerodrome; and
- (b) change of nominated persons at an aerodrome already certified.

Purpose of the meeting

The aim of the interview and exchange of information between the intended nominated persons and the Competent Authority is, for the latter to acquire information on the intended work areas of the nominated persons and their respective competence level so as to verify their suitability for the posts.

The purpose of the information exchange is to create good contact and understanding between the both parties, and to come to a mutual conclusion on, if necessary, possible solutions for training and personal development over time.

Possible agenda items:

- (a) information from the Competent Authority on organisation and mission of the Competent Authority, the regulatory framework, and specifically Safety Management System requirements;
- (b) information from the nominated person concerning the intended work area;
- (c) enforcement methodology of the Competent Authority;
- (d) the role and responsibility of the accountable manager/chief operating officer/safety coordinator or other nominated post holders;
- (e) expected competence requirement of the nominated person in relation to present personal status and experience presented in a CV or equivalent documentation;
- (f) interview/discussion concerning depth of knowledge, and understanding of the applicable legislation;
- (g) the role and responsibility of the Competent Authority and of the nominated person;

- (h) understanding of aviation in general and for the specific nominated post, how operators/activities at the aerodrome including Air Navigation Service Providers, and other aviation activities can impact aircraft safety; and
- (i) distribution of delegated powers depending on the organisational situation.

AMC1 ADR.AR.C.035(b)(1);(2) Issuance of certificate

ISSUANCE OF SEPARATE CERTIFICATES

- (a) In case that there is a possibility to issue both separate and single certificates, the Competent Authority should act in accordance with the application made by the applicant.
- (b) In case that there is a possibility to issue separate certificates, both certificates should be issued by the same Competent Authority.
- (c) In case that an aerodrome operator operates several aerodromes, these should be listed on the aerodrome operator's certificate.

AMC1 ADR.AR.C.035(d) Issuance of certificate

OPERATING CONDITIONS OR LIMITATIONS

- (a) If, during the certification process, an operating condition or a limitation or has been determined as necessary to be imposed on or implemented at the aerodrome, the Competent Authority should ensure that such limitation or procedure is also included in the aerodrome manual.
- (b) The Competent Authority should also ensure that the aerodrome manual contains all limitations, or any other similar information prescribed in the certification specifications included in the certification basis of the aerodrome.

AMC1 ADR.AR.C.035(g) Issuance of certificate

APPROVAL OF THE PROCEDURE FOR THE MANAGEMENT AND NOTIFICATION OF CHANGES

The Competent Authority should establish and document its process to be followed by the aerodrome inspectors when assessing the scope of the changes in the procedure proposed by the aerodrome operator to be followed for the management and notification of the changes. Criteria to be used include, but are not limited to:

- (a) frequency of changes;
- (b) magnitude of changes;
- (c) complexity of the aerodrome and type of operations;
- (d) density of traffic at the aerodrome;
- (e) time required to assess the documentation of the changes notified by the aerodrome operator;
- (f) reasonable reaction times in relation to types of changes for the competent authority to object to a notification;
- (g) need for the timely publication of the changes and their notification by the AIRAC system;
- (h) previous conduct of the aerodrome operator; and

- (i) effectiveness of the safety management system of the aerodrome operator.

AMC1 ADR.AR.C.040 Changes

EFFECTIVE CERTIFICATION SPECIFICATIONS FOR CHANGES

- (a) The Certification Specifications that the Competent Authority should use to assess the application for or the notification of a change, should be those which were effective during the date of the notification of the change by the aerodrome operator.
- (b) Notwithstanding paragraph (a) above, at any point of the process the aerodrome operator may request to use Certification Specifications that came into force after the filing of the application for, or notification of a change. In such cases, the Competent Authority should examine if it is necessary to also notify the aerodrome operator of other Certification Specifications, which also came into effect after the date of the application for, or the notification of the change by the aerodrome operator, and which are, in the opinion of the Competent Authority, directly related to those already identified as being affected by the change.
- (c) Notwithstanding paragraph (a) and (b) above, the Competent Authority may at any time, after the application or notification of a change by the aerodrome operator, decide to notify the aerodrome operator of any Certification Specifications that it deems necessary for the proposed change.

AMC2 ADR.AR.C.040(a) Changes

CHANGES REQUIRING PRIOR APPROVAL

- (a) Upon receiving an application for a proposed change that requires a prior approval, the Competent Authority should, in due time:
 - (1) assess the proposed change in relation to the certification basis, and the applicable requirements of Part-ADR.OR, Part-ADR.OPS, as well as any other applicable requirements;
 - (2) assess if the aerodrome operator has identified all the applicable Certification Specifications, applicable requirements of Part-ADR.OR, Part-ADR.OPS, or other applicable requirements which are related to or affected by the change, as well as any proposal of the applicant for the demonstration of an equivalent level of safety;
 - (3) assess the actions proposed by the aerodrome operator in order to show compliance with (1) and (2) above;
 - (4) review and assess the content of proposed changes to the aerodrome manual; and
 - (5) evaluate the safety assessment that has been submitted by the aerodrome operator, in accordance with GM1 ADR.AR.C.035(a) and verify its compliance with ADR.OR.B.040(f).
- (b) The Competent Authority should also determine, in due time:
 - (1) if the proposed change is directly related to any other Certification Specification which had been included in the certification basis. If the Competent Authority finds such a relationship, it should include these related Certification Specifications amongst those to be notified to the applicant; and
 - (2) if the proposed change is such that a special condition, or an amendment to an existing special condition is required.

AMC/GM to Annex I – Part-AR

SUBPART C – OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C)

- (c) The Competent Authority should document and notify, in writing, the aerodrome operator, in due time, of:
 - (1) the Certification Specifications that it has identified to be applicable in accordance with the previous paragraphs (a) and (b);
 - (2) any provisions for which the Competent Authority has accepted the applicant to demonstrate an equivalent level of safety; and
 - (3) any special conditions, or amendments to special conditions it finds necessary.
- (d) Any subsequent changes to the items mentioned in paragraph (c), should be documented and notified to the aerodrome operator, in writing, in due time.
- (e) The Competent Authority should, in due time, verify the compliance of the aerodrome operator and, depending on the change, examine the need for prescribing any condition for the operation of the aerodrome during the change.
- (f) When notifying the aerodrome operator in accordance with paragraph (c) or (d), the Competent Authority should also inform him/her of the right of appeal, as exists under the applicable national legislation.

AMC3 ADR.AR.C.040(a);(f) Changes

GENERAL

- (a) Changes in nominated persons: The Competent Authority should be informed of any changes to personnel specified in ADR.OR.D.015 – Personnel requirements that may affect the certificate or the terms of approval attached to it. When an aerodrome operator submits the name of a nominee for the nominated persons mentioned in ADR.OR.D.015, the Competent Authority should assess his/her qualifications, and may interview the nominee, or call for additional evidence of his/her suitability before deciding upon his/her acceptability (see AMC1 ADR.AR.C.035(a)).
- (b) The Competent Authority should receive from the aerodrome operator each management system documentation amendment, including amendments that do not require prior approval by the Competent Authority. A documented systematic approach should be used for maintaining the information on when an amendment was received by the Competent Authority and when it was approved.
- (c) Where the amendment requires the Competent Authority's approval, the Competent Authority, when satisfied, should indicate its approval in writing. Where the amendment does not require prior approval, the Competent Authority should acknowledge receipt in writing within the time limits existing under the relevant national legislation.
- (d) For changes requiring prior approval, in order to verify the aerodrome operator's compliance with the applicable requirements, the Competent Authority should consider the need to conduct an audit of the operator, limited to the extent of the changes. If required for verification, the audit should include additional interviews and inspections carried out at the aerodrome operator's facilities.

GM1 ADR.AR.C.040(c) Changes

AMENDMENT OF THE TERMS OF THE CERTIFICATE INCLUDED IN THE CERTIFICATE

The Competent Authority should amend the certificate for any change that affects the terms of the certificate, irrespectively of their magnitude.

GM1 ADR.AR.C.040 (d) Changes

CONDITIONS UNDER WHICH TO OPERATE DURING A CHANGE

The conditions or limitations under which an aerodrome operator can operate during a change should be approved by the authority but should usually be elaborated between the operator and the authority upon suggestion of the aerodrome operator.

GM1 AR.C.050 Declarations of providers of apron management services

VERIFICATION — DECLARATION

The verification made by the Competent Authority upon receipt of a declaration does not necessarily imply an inspection. The primary aim is to check whether what is declared complies with applicable requirements.

GM1 ADR.AR.C.055 Findings, observations, corrective actions, and enforcement measures

ENFORCEMENT MEASURES — FINANCIAL PENALTIES

The Competent Authority may additionally, and depending on the nature and the repetitiveness of the findings, or the level of implementation of the corrective actions, impose financial penalties as appropriate, which are effective, proportionate, and dissuasive.

GM2 ADR.AR.C.055 Findings, observations, corrective actions, and enforcement measures

TRAINING

For a level 1 finding, it may be necessary for the Competent Authority to ensure that further training by the aerodrome operator, or the provider of the apron management services is carried out, and audited by the Competent Authority before the activity is resumed, dependent upon the nature of the finding.

GM3 ADR.AR.C.055 Findings, corrective actions, and enforcement measures

CATEGORIES OF FINDINGS — DOCUMENTARY EVIDENCE

Examples of documentary evidence include, but are not limited to:

- (a) aerodrome or equipment manuals;
- (b) contracts or other types of arrangements;
- (c) training, qualification, or medical records;
- (d) inspection records;
- (e) test or exercise results;

- (f) internal audit results;
- (g) maintenance records; and
- (h) other similar material required to be maintained by the aerodrome operator, or the provider of apron management services.

**AMC/GM to ANNEX I – Part Organisation Requirements – Aerodrome Operators
(Part-ADR.OR)**

SUBPART A – GENERAL REQUIREMENTS (ADR.OR.A)

AMC1 ADR.OR.A.015 Means of compliance

DEMONSTRATION OF COMPLIANCE

In order to demonstrate that the Implementing Rules are met, a safety assessment should be completed and documented. The result of this risk assessment should demonstrate that an equivalent level of safety to that established by the Acceptable Means of Compliance (AMC) adopted by the Agency is reached.

SUBPART B – CERTIFICATION (ADR.OR.B)

AMC1 ADR.OR.B.015(a) Application for a certificate

APPLICATION

The application should be made in writing, and be signed by the applicant, using a standardised form established by the Competent Authority.

AMC1 ADR.OR.B.015(b)(1);(2);(3);(4) Application for a certificate

INFORMATION TO BE PROVIDED TO THE COMPETENT AUTHORITY

- (a) The applicant should
 - (1) provide its telephone, and fax number, and e-mail address for communication with the Competent Authority;
 - (2) indicate to the authority the names of its employees whom the Competent Authority would contact in order to address any issues that might arise during the evaluation of the application, and the certification process.
- (b) The applicant should provide the Competent Authority with the following:
 - (1) information about the location of the aerodrome: the exact location of the aerodrome should be depicted on a map of a suitable scale acceptable to the Competent Authority;
 - (2) information about the type of operations at the aerodrome, including:
 - (i) operations during the day and/or night, and type of approaches;
 - (ii) landing, and/or take-off operations on each runway;
 - (iii) the aircraft types to be served at the aerodrome, and the aircraft type to be used for the design of the aerodrome; and
 - (iv) any limitations to the operation of the aerodrome.
 - (3) the drawing(s) showing the design of the aerodrome, which should:
 - (i) be in a suitable scale, acceptable to the Competent Authority;
 - (ii) be in an electronic format if this is acceptable to the Competent Authority.
 - (iii) contain all the necessary information, including:
 - (A) runway(s) orientation;
 - (B) the dimensions of the aerodrome's physical characteristics;
 - (C) the visual and non-visual aids;
 - (D) the obstacle limitation surfaces, and any other surfaces applicable; and
 - (E) the aerodrome facilities, installations, and fixed equipment and their location.
 - (5) Description, height, and location of obstacles or objects that could endanger safety, in accordance with the applicable aeronautical data requirements (see ADR.OPS.A.005 and AMC1 ADR.OPS.A.005).
 - (6) A meteorological study of the area, including temperature, visibility, and ceiling and wind conditions, including wind conditions occurring with poor visibility and/or low

cloud base at the aerodrome, and their frequency, as well as the accompanying wind direction and speed.

- (c) The applicant should propose to the Competent Authority the certification specifications which are applicable to the proposed aerodrome. These should consist of a list of:
- (1) the certification specifications that are matching the design and the operation of the aerodrome;
 - (2) if relevant, the Certification Specifications for which the applicant proposes to show compliance in a different manner and demonstrate an equivalent level of safety. Such a proposal has to be acceptable to the Competent Authority. In such cases, the applicant should also propose the method that will be used to demonstrate compliance and achieve an equivalent level of safety, and submit all the necessary documentation to support the proposal;
 - (3) if relevant, any other proposal for which the applicant assumes that the Certification Specifications issued by the Agency are inadequate or inappropriate.
- (d) The applicant should provide the Competent Authority documentation to demonstrate how he/she will comply with the applicable requirements of the Basic Regulation, Part-ADR.OR, and Part-ADR.OPS, and any other applicable requirements that are matching the aerodrome design and its operation.

AMC1 ADR.OR.B.015(b)(4) Application for a certificate

EVIDENCE OF ARRANGEMENTS WITH THIRD PARTIES

The applicant should provide all necessary evidence for arrangements with third parties that provide, or intend to provide services, or undertake activities at the aerodrome, whose activities may have an impact on safety.

AMC1 ADR.OR.B.015(b)(5) Application for a certificate

ADEQUACY OF RESOURCES

(a) General

The applicant should provide all necessary information needed in order to demonstrate to the Competent Authority that its proposed organisation and management are suitable, and properly matched to the scale and scope of the operation.

The aerodrome operator should have the ability to discharge its responsibilities with regard to safety. The accountable manager should have access, as well as the authorisation, to the necessary resources to ensure that operations are carried out in accordance with the applicable requirements. The resources include, but are not limited to, personnel, tools and equipment, as well as financial resources.

(b) Arrangements with other parties

The applicant should indicate those services that are going to be provided directly by himself/herself and those that will be provided by contracted third parties with regard to the adequacy of the resources.

The applicant should also provide evidence of arrangements if third parties are going to be involved in the provision of services. In addition, the applicant should provide any relevant information needed, or requested by the Competent Authority, regarding such third parties.

GM1 ADR.OR.B.015(b)(5) Application for a certificate

ADEQUACY OF RESOURCES

(a) General

In demonstrating to the Competent Authority the suitability of its organisation and management, the applicant should, amongst others, take into account in his/her analysis the following:

- (1) the size and complexity of the aerodrome;
- (2) the type of traffic;
- (3) the type of operations;
- (4) the level and the density of the traffic;
- (5) the operating hours of the aerodrome;
- (6) the amount of full-time equivalents (FTEs) necessary for each activity;
- (7) human factors principles;
- (8) labour legislation; and
- (9) the degree of subcontracting.

(b) Adequacy of financial resources

The financial resources required are linked to the overall objective for the safe operation and maintenance of the aerodrome, including the aerodrome operator's capability to implement the corrective actions needed, in a timely manner. Information that may be provided to the Competent Authority includes audited accounts of the previous financial year, business plans etc.

AMC1 ADR.OR.B.015(b)(6) Application for a certificate

RELATIONSHIP OF THE APPLICANT WITH THE AERODROME OWNER

The applicant should demonstrate to the Competent Authority, in accordance with the applicable national legislation that he/she is duly authorised to undertake all activities necessary under the provisions of the Basic Regulation, and its Implementing Rules, and any other applicable national or European Union rule.

The applicant should also provide the Competent Authority with all information necessary, under the applicable national legislation, to demonstrate to the Competent Authority his/her relationship with the aerodrome owner, and/or the owner of the land to be used for the aerodrome development.

Such documentation should include, but is not limited to, contracts, lease agreements, authorisations between the persons involved, etc.

AMC1 ADR.OR.B.015(b)(7) Application for a certificate

INFORMATION TO BE PROVIDED FOR MANAGEMENT PERSONNEL

The applicant should provide information regarding the qualifications, and experience of the accountable manager, and the other nominated persons required.

AMC1 ADR.OR.B.015(b)(9) Application for a certificate

AERODROME MANUAL

The aerodrome manual and its amendments may be submitted to the Competent Authority in electronic format if this is acceptable to the Competent Authority. If the aerodrome manual is submitted in electronic format, the format should be such that allows the Competent Authority to review, store, and reproduce it.

GM1 ADR.OR.B.015 Application for a certificate

INITIAL INTEREST

Prior to submitting an application for a certificate to the Competent Authority, an applicant should arrange for a meeting with the Competent Authority.

The applicant should also make arrangements for its key personnel to be present during this meeting.

During this meeting, the applicant should present to the authority its plans with regard to the aerodrome.

During the meeting, the applicant may be:

- (a) provided by the Competent Authority with general information about the applicable requirements for the aerodrome;
- (b) provided with copies of the applicable requirements, and a description of the procedures that are followed during the certification process; and
- (c) informed by the Competent Authority about possible approvals, permits, or clearances that may be needed to be obtained from other competent authorities of the Member State.

GM1 ADR.OR.B.015(b)(2) Application for a certificate

AERODROME BOUNDARIES

The map submitted with the application should indicate the boundary of the aerodrome area. It should include, at least, runways, taxiways, aprons, associated strips, runway end safety areas, stopways, clearways, aerodrome visual aids, fixed aerodrome equipment, other aerodrome operational areas, areas adjacent to the movement area, etc, while maintenance areas may be excluded if acceptable to the Competent Authority.

The above aerodrome boundary should not be confused with the boundaries established for other purposes, such as fences, the land ownership boundaries used by local planning authorities, or those used to designate security restricted zones.

AMC1 ADR.OR.B.025(a)(1) Demonstration of compliance

USE OF THIRD PARTIES TO DEMONSTRATE COMPLIANCE

While performing the necessary actions, inspections, tests, safety assessments, or exercises necessary to demonstrate compliance, the aerodrome operator may also use contracted third parties.

In any case, the responsibility remains with the aerodrome operator.

AMC1 ADR.OR.B.025(a)(1) Demonstration of compliance

FLIGHT PROCEDURES

Evidence that the flight procedures of the aerodrome have been approved, as required by the applicable requirements, is considered to be an Acceptable Means of Compliance.

GM1 ADR.OR.B.025 (a)(3) Demonstration of compliance

MODEL FORM OF DECLARATION OF COMPLIANCE — AERODROME OPERATORS

<p>Declaration of compliance</p> <p>of aerodrome operator</p> <p>in accordance with Commission Regulation (EC) No/..... on aerodrome design and operation</p>
<p>Aerodrome name – Location indicator:</p>
<p>Aerodrome operator</p> <p>Name:</p> <p>Place in which the operator is established or residing:</p> <p>Name and contact details of the accountable manager:</p>
<p>Statements</p> <p>The certification basis is complied with, and the aerodrome, as well as its obstacle limitation and protection surfaces, and other areas associated with the aerodrome, have no features or characteristics making it unsafe for operation.</p> <p>All personnel are qualified, competent, and trained in accordance with the applicable requirements.</p> <p>The management system documentation, including the aerodrome manual, comply with the applicable requirements set out in Part-ADR.OR and Part-ADR.OPS.</p>

The operation and maintenance of the aerodrome will be carried out in accordance with the requirements of Regulation (EC) No 216/2008 and its Implementing Rules, the terms of the certificate, and the procedures and instructions specified in the aerodrome manual.

The aerodrome operator confirms that the information disclosed in this declaration is correct.

Date, name and signature of the accountable manager

AMC1 ADR.OR.B.040(a) Changes

CHANGES REQUIRING PRIOR APPROVAL

The aerodrome operator should ensure that prior to initiating any change to the aerodrome or its operation, which requires prior approval, an application is submitted to the Competent Authority. The applicant should provide documentation containing a description of the proposed change, in which the following are identified:

- (a) the parts of the aerodrome and the aerodrome manual which are affected by the change, including relevant appropriate detailed design drawings;
- (b) the certification specifications with which the proposed change has been designed to comply with, including the certification specifications for which the applicant proposes to show compliance in a different manner in order to demonstrate an equivalent level of safety (for such cases see AMC1 ADR.OR.B.015(b)(1);(2);(3);(4), paragraph (c)(2));
- (c) the requirements of Part-ADR.OR and Part-ADR.OPS, and any other applicable requirements that have to be complied with as a result of the proposed change, including the way in which compliance is intended to be demonstrated; and
- (d) the safety assessment required under ADR.OR.B.040(f).

GM1 ADR.OR.B.040 (a);(b)

CHANGES REQUIRING PRIOR APPROVAL

The following is a list of items requiring prior approval by the Competent Authority, as specified in the applicable Implementing Rules.

- (a) Use of alternative means of compliance as required by ADR.OR.A.015 Means of Compliance.
- (b) Changes to the notification procedure as required by ADR.OR.B.015 Application for a certificate.
- (c) Changes to the certification basis, or the terms of the certificate of the aerodrome, as required by ADR.OR.B.040 Changes.
- (d) Changes to aerodrome equipment including, but not limited to, ILS, MLS, VOR, DME, NDB, Surface Movement Radar, RFFS vehicles, Continuous Friction Measurement Equipment, secondary power supply etc. as required by ADR.OR.B.040 Changes.
- (e) Significant changes to any of the elements of the operator's management system as required by ADR.OR.D.005(b) Management.
- (f) Changes to the training programme as required by ADR.OR.D.017 Training and proficiency check programmes.
- (g) Changes to the proficiency check programme as required by ADR.OR.D.017 Training and proficiency check programmes
- (h) Changes to the level of protection of rescue and firefighting services as required by ADR.OPS.B.010 Rescue and firefighting services.
- (i) Changes to low visibility procedures as required by ADR.OPS.B.045 Low Visibility Operations.
- (j) Major constructions at the aerodrome as required by ADR.OPS.B.070 Aerodrome works safety.
- (k) Operation of aircraft with higher code letter as required by ADR.OPS.B.090 Use of the aerodrome by higher code letter aircraft.
- (l) Changes to the maintenance programme as required by ADR.OPS.C.005 General.
- (m) Major maintenance activities as required by ADR.OPS.C.005 General.

GM1 ADR.OR.B.040(f) Changes

ASSESSMENT OF CHANGES

- (a) Safety assessment for a change

A safety assessment for a change should include:

- (1) identification of the scope of the change;
- (2) identification of hazards;
- (3) determination of the safety criteria applicable to the change;
- (4) risk analysis in relation to the harmful effects or improvements in safety related to the change;

- (5) risk evaluation and, if required, risk mitigation for the change to meet the applicable safety criteria;
- (6) verification that the change conforms to the scope that was subject to safety assessment, and meets the safety criteria, before the change is put into operation; and
- (7) the specification of the monitoring requirements necessary to ensure that the aerodrome and its operation will continue to meet the safety criteria after the change has taken place.

(b) Scope of the safety assessment

The scope of the safety assessment should include the following elements and their interaction:

- (1) the aerodrome, its operation, management, and human elements being changed;
- (2) interfaces and interactions between the elements being changed and the remainder of the system;
- (3) interfaces and interactions between the elements being changed and the environment in which it is intended to operate; and
- (4) the full lifecycle of the change from definition to operations.

(c) Safety criteria

The safety criteria used should be defined in accordance with the procedures for the management of change contained in the aerodrome manual.

The safety criteria used should, depending on the availability of data, be specified with reference to explicit quantitative acceptable safety risk levels, recognised standards, and/or codes of practice, the safety performance of the existing system, or a similar system.

GM1 ADR.OR.B.060 Declaration of providers of apron management services

MODEL FORM OF DECLARATION OF COMPLIANCE — PROVIDERS OF APRON MANAGEMENT SERVICES

Declaration of compliance of provider of Apron Management Services	
In accordance with Commission Regulation (EC) No XXX/2013 laying down requirements and procedures related to aerodromes pursuant to Regulation (EC) No 216/ 2008 of the European Parliament and of the Council	
Provider of apron management services	
Company name and address:	
Name and contact details of the accountable manager:	
Starting date of operation:	
Aerodrome(s) at which the apron management services are provided:	
Applicable requirements set out in Part-ADR.OPS on the provision of apron management services are documented and reflected in the aerodrome manual.	
Attached to this declaration is a list of alternative means of compliance with references to the AMCs they replace, in accordance with ADR.OR.A.015(c).	
The services are provided in accordance with the content of the relevant aerodrome manual.	
Personnel of the apron management services provider have received the necessary initial training, and receive recurrent training to ensure continuing competence.	
(If applicable) The operator has implemented and demonstrated conformance to an officially recognised industry standard.	
Reference of the standard:	Certification body:
Date of the last conformance audit:	
Any change in the operation that affects the information disclosed in this declaration will be notified to the Competent Authority.	
I hereby confirm that the information disclosed in this declaration is correct.	
Date and signature of the accountable manager	

AMC1 ADR.OR.B.065 Termination of operation

TERMINATION OF OPERATION

In case of intended termination of the operation of the aerodrome, the aerodrome operator should notify, in writing, the Competent Authority and the Aeronautical Information Service provider. The notification should be done in such time in advance, so as to allow for the timely publication of the changes, and their notification by the Aeronautical Information Regulation And Control (AIRAC) system in accordance with the related timeframe.

Upon the termination of the operation, the aerodrome operator should apply closed runway markings, as well as any other measure the authority has found appropriate.

SUBPART C – ADDITIONAL RESPONSIBILITIES (ADR.OR.C)

AMC1 ADR.OR.C.005(c) Aerodrome operator Responsibilities

PUBLICATION OF INFORMATION TO THE AERONAUTICAL INFORMATION PUBLICATION

A description of cases involving exemptions, derogations, cases of equivalent level of safety, special conditions, including limitations with regard to the use of the aerodrome, should be published in the Aeronautical Information Publication (AIP), after coordination with the Competent Authority.

AMC1 OR.C.020(b) Findings

GENERAL

The corrective action plan defined by the operator should address the effects of the non-compliance, as well as its root cause.

GM1 OR.C.020 Findings

GENERAL

- (a) Preventive action is the action to eliminate the cause of a potential non-compliance or other undesirable potential situation.
- (b) Corrective action is the action to eliminate or mitigate the root cause(s), and prevent recurrence of an existing detected non-compliance, or other undesirable condition or situation. Proper determination of the root cause is crucial for defining effective corrective actions to prevent recurrence.
- (c) Correction is the action to eliminate a detected non-compliance.

AMC1 ADR.OR.C.030 Occurrence reporting

GENERAL

The aerodrome operator and the provider of provider of apron management services should establish procedures to be used for reporting to the Competent Authority and any other organisation required which include:

- (a) description of the applicable requirements for reporting;
- (b) description of the reporting mechanism, including reporting forms, means, and deadlines;
- (c) personnel responsible for reporting; and
- (d) description of mechanism and personnel responsibilities for identifying root causes, and the actions that may be needed to be taken to prevent similar occurrences in the future, as appropriate.

AMC1 ADR.OR.C.040 Prevention of fire

The aerodrome operator should develop procedures and assign responsibilities for the control of smoking or activities that involve the use of fire hazard.

In addition, these procedures should address the adoption and use of mitigating measures when necessary activities (e.g. maintenance, etc.) which might involve fire hazard need to be authorised.

Such authorised activities may not include smoking within the movement area, other operational areas of the aerodrome, or areas of the aerodrome where fuel or other flammable material are stored.

SUBPART D – MANAGEMENT (ADR.OR.D)**AMC1 ADR.OR.D.005(b)(1) Management system**

SAFETY MANAGEMENT SYSTEM

The safety management system of an aerodrome operator should encompass safety by establishing an organisational structure for the management of safety proportionate and appropriate to the size of the aerodrome operator, and the nature and type of operations. The organisational structure should include a Safety Review Board, and depending on its organisational complexity and structure, a Safety Services Office to assist the work of the safety manager, in accordance with paragraph (a) and (b) below:

(a) Safety Services Office

- (1) The safety manager (see ADR.OR.D.015 and AMC1.ADR.OR.D.015(c)) should be responsible for the operation of the Safety Services Office which should be independent and neutral in terms of the processes and decisions made regarding the delivery of services by the line managers of operational units.
- (2) The function of the Safety Services Office should be to:
 - (i) manage and oversee the hazard identification system;
 - (ii) monitor safety performance of operational units directly involved in aerodrome operations;
 - (iii) advise senior management on safety management matters; and
 - (iv) assist line managers with safety management matters.
- (3) Operators of multiple aerodromes should either establish a central Safety Services Office and appropriate safety departments/functions at all aerodromes or separate Safety Services Office at each aerodrome. Arrangements should be made to ensure continuous flow of information and adequate coordination.

(b) Safety Review Board

- (1) The Safety Review Board should be a high level committee that considers matters of strategic safety in support of the accountable manager's safety accountability.
- (2) The board should be chaired by the accountable manager, and be composed of heads of functional areas.
- (3) The Safety Review Board should monitor:
 - (i) safety performance against the safety policy and objectives;
 - (ii) that any safety action is taken in a timely manner; and
 - (iii) the effectiveness of the organisation's safety management system.
- (4) The Safety Review Board should ensure that appropriate resources are allocated to achieve the established safety performance.
- (5) The safety manager or any other relevant person may attend, as appropriate, Safety Review Board meetings. He/she may communicate to the accountable manager all information, as necessary, to allow decision making based on safety data.
- (6) Operators of multiple aerodromes should either establish a central Safety Review Board, or separate Safety Review Boards for each aerodrome or group of aerodromes. In the case of central or group Safety Review Groups, they should ensure that all aerodromes are represented in the Safety Review Board, at the

appropriate management level. Arrangements should be made to ensure continuous flow of information and adequate coordination.

In less complex aerodrome organisations/operations, the aerodrome operator should nominate a person who fulfils the role of safety manager, and who is responsible for coordinating the safety management system (see ADR.OR.D.015 and AMC1 ADR.OR.D.015(c)).

GM1 ADR.OR. D.005(b)(1) Management system

SAFETY REVIEW BOARD — SAFETY ACTION GROUP

(a) Safety Review Board

Depending on the size of the organisation, the type and complexity of operations, the responsibilities of the Safety Review Board may be included in other high level committees of the organisation.

(b) Safety action group

- (1) A Safety Action Group may be established as a standing group, or as an ad hoc group to assist or act on behalf of the Safety Review Board.
- (2) More than one safety action group may be established depending on the scope of the task and specific expertise required.
- (3) A Safety Action Group should report to, and take strategic direction from the Safety Review Board, and should be comprised of managers, supervisors, and personnel from operational areas.
- (4) The Safety Action Group should:
 - (i) monitor operational safety;
 - (ii) resolve identified risks;
 - (iii) assess the impact on safety of operational services;
 - (iv) ensure that safety actions are implemented within agreed timescales; and
 - (v) review the effectiveness of previous safety recommendations and promotions.

GM2 ADR.OR. D.005(b)(1) Management system

SAFETY SERVICES OFFICE — SAFETY REVIEW BOARD — SAFETY ACTION GROUP

Different titles may also be used for the Safety Services Office, the Safety Review Board, and the Safety Actions Group.

AMC1 ADR.OR. D.005(b)(2) Management system

SAFETY POLICY

(a) The safety policy should:

- (1) be endorsed by the accountable manager;
- (2) clearly identify safety as the highest organisational priority over commercial, operational, environmental, or social pressures;
- (3) reflect organisational commitments regarding safety and its proactive and systematic management;

- (4) be communicated, with visible endorsement, throughout the organisation;
 - (5) include safety reporting principles; and
 - (6) be periodically reviewed to ensure it remains relevant and appropriate to the organisation.
- (b) The safety policy should:
- (1) include a commitment:
 - (i) to improve towards the highest safety standards;
 - (ii) to comply with all applicable legal requirements, meet all applicable standards, and consider best practices;
 - (iii) to provide appropriate resources;
 - (iv) to enforce safety as one primary responsibility of all managers and staff;
 - (2) include the safety reporting procedures;
 - (3) with reference to a just culture, clearly indicate which types of operational behaviours are unacceptable, and include the conditions under which disciplinary action would not apply; and
 - (4) be periodically reviewed to ensure it remains relevant and appropriate.
- (c) Senior management should:
- (1) continually promote the safety policy to all personnel, and demonstrate their commitment to it;
 - (2) provide necessary human and financial resources for its implementation; and
 - (3) establish safety objectives and performance standards.

GM1 ADR.OR. D.005(b)(2) Management system

SAFETY POLICY

(a) Safety policy – General

The safety policy is the means whereby the aerodrome operator states its intention to maintain and, where practicable, improve safety levels in all its activities, and to minimise its contribution to the risk of an aircraft accident as far as reasonably practicable. The safety policy should state that the purpose of safety reporting, and internal investigations is to improve safety, not to apportion blame to individuals.

(b) Safety policy – Just culture

The safety policy should actively encourage effective safety reporting and, by defining the line between acceptable performance (often unintended errors) and unacceptable performance (such as negligence, recklessness, violations, or sabotage), provide fair protection to reporters. A safety or just culture may not, however, preclude the 'criminalisation of error', which is legally, ethically, and morally within the sovereign rights of any Member State, provided European Union law and established international agreements are observed. A judicial investigation, and consequences of some form, may be expected following an accident or serious incident especially if a failure resulted in lives lost or property damaged, even if no negligence or ill intent existed. A potential issue could, therefore, exist if voluntary hazard reports, which relate to latent deficiencies of a system or its performance, are treated in the same way as those concerning accident, and serious incident investigations. The intent of protecting hazard reports should not challenge the legitimacy of a judicial investigation, or

demand undue immunity. However, legal argument does usually take precedence over any technical or safety-related argument.

AMC1 ADR.OR.D.005(b)(3) Management system

HAZARD IDENTIFICATION PROCESS

- (a) Hazard identification should be based on a combination of reactive, proactive, and predictive methods of safety data collection. Reactive, proactive, and predictive schemes for hazard identification should be the formal means of collecting, recording, analysing, acting on, and generating feedback about hazards and the associated risks that affect safety.
- (b) All reporting systems, including confidential reporting schemes, should include an effective feedback process.

GM1 ADR.OR.D.005(b)(3) Management system

HAZARD IDENTIFICATION

- (a) Hazard identification – General
 - (1) Hazard identification may include the following factors and processes:
 - (i) design factors, including equipment and task design;
 - (ii) procedures and operating practices, including their documentation and checklists, and their validation under actual operating conditions;
 - (iii) communications, including means, terminology, and language;
 - (iv) personnel factors, such as company policies for recruitment, training, remuneration, and allocation of resources;
 - (v) organisational factors, such as the compatibility of production and safety goals, the allocation of resources, operating pressures, and the corporate safety culture;
 - (vi) work environment factors, such as ambient noise and vibration, temperature, lighting, and the availability of protective equipment and clothing;
 - (vii) regulatory oversight factors, including the applicability and enforceability of regulations, the certification of equipment, personnel, and procedures, and the adequacy of oversight;
 - (viii) defences, including such factors as the provision of adequate detection and warning systems, the error tolerance of equipment, and the resilience of equipment to errors and failures; and
 - (ix) human performance, restricted to medical conditions and physical limitations.
 - (2) Hazard identification may use internal and external sources:
 - (i) Internal sources:
 - (A) voluntary occurrence reporting schemes;
 - (B) safety surveys;
 - (C) safety audits;
 - (D) normal operations;

- (E) monitoring schemes;
 - (F) trend analysis;
 - (G) feedback from training; and
 - (H) investigation and follow-up of incidents
- (ii) External sources:
- (A) accident reports;
 - (B) state mandatory occurrence reporting system; and
 - (C) state voluntary reporting system.
- (3) The methods used for hazard identification depends on the resources and constraints of each particular aerodrome operator, and on the size and the complexity of the operations. Nevertheless, hazard identification, regardless of implementation, complexity and size, is part of the aerodrome operator's safety documentation. Under mature safety management practices, hazard identification is a continuous, ongoing daily activity. It is an integral part of the aerodrome operator's processes. There are three specific conditions under which special attention to hazard identification should be paid. These three conditions should trigger more in depth and far reaching hazard identification activities and include:
- (i) any time that the aerodrome operator experiences an unexplained increase in safety related events or regulatory infractions;
 - (ii) any time major operational changes are foreseen, including changes to key personnel or other major equipment or systems; and
 - (iii) before and during periods of significant organisational change, including rapid growth of contraction, corporate mergers, acquisitions, or downsizing.
- (4) Hazard identification may use the following tools and techniques:
- (i) brainstorming which is an unbounded but facilitated discussion with a group of experts;
 - (ii) Hazard and Operability (HAZOP) Study which is a systematic and structured approach using parameter and deviation guidewords. This technique relies on a very detailed system description being available for study, and usually involves breaking down the system into well-defined subsystems and functional or process flows between subsystems. Each element of the system is then subject to discussion within a multidisciplinary group of experts, against the various combinations of the guidewords and deviations;
 - (iii) checklists, which are lists of known hazards or hazard causes that have been derived from past experience. The past experience could be previous risk assessments, or similar systems, or operations, or from actual incidents that have occurred in the past. The technique involves the systematic use of an appropriate checklist, and the consideration of each item on the checklist for possible applicability to a particular system. Checklists should always be validated for applicability prior to use;
 - (iv) Failure Modes and Effects Analysis (FMEA), which is a 'bottom up' technique, used to consider ways in which the basic components of a system can fail to perform their design intent. The technique relies on a detailed system description, and considers the ways in which each sub-component of the system could fail to meet its design intent, and what the consequences could

be for the overall system. For each sub-component of a system the FMEA should consider:

- (A) all the potential ways that the component could fail;
- (B) the effects that each of these failures would have on the system behaviour;
- (C) the possible causes of the various failure modes; and
- (D) how the failures might be mitigated within the system or its environment.

The system level at which the analysis is applied can vary, and is determined by the level of detail of the system description used to support the analysis. Depending on the nature and complexity of the system, the analysis could be undertaken by an individual system expert, or by a team of system experts acting in group sessions.

- (v) the Structured What-If Technique (SWIFT) is a simple and effective alternative technique to HAZOP and involves a multidisciplinary team of experts. It is a facilitated brainstorming group activity, but is typically carried out on a higher level system description, having fewer sub-elements, than for HAZOP and with a reduced set of prompts.
- (5) Identified hazards are registered in a hazard log. The nature and format of such log may vary from a simple list of hazards to a more sophisticated relational database linking hazards to mitigations, responsibilities, and actions. The following information may be included in the hazard log:
- (i) unique hazard reference number against each hazard;
 - (ii) hazard description;
 - (iii) indication of the potential causes of the hazard;
 - (iv) qualitative assessment of the possible outcomes and severities of consequences arising from the hazard;
 - (v) qualitative assessment of the risk associated with the possible consequences of the hazard;
 - (vi) description of the risk controls for the hazard; and
 - (vii) indication of responsibilities in relation to the management of risk controls.
- (6) Additionally, the following information may also be included in the log:
- (i) a quantitative assessment of the risk associated with the possible consequences of the hazard;
 - (ii) record of actual incidents or events related to the hazard, or its causes;
 - (iii) risks tolerability statement;
 - (iv) statement of formal system monitoring requirements;
 - (v) indication of how the hazard was identified;
 - (vi) hazard owner;
 - (vii) assumptions; and
 - (viii) third party stakeholders.
- (b) Hazard identification — Indicators
- (1) Reactive (lagging) indicators:

Metrics that measure events that have already occurred and that impact on safety performance.

As reactive indicators only reflect system failures, their use can only result in determining a reactive response. Although they do measure failure to control hazards, they do not normally reveal why the system failed, or if there are any latent hazards.

(2) Proactive (Leading) indicators:

Metrics that measure inputs to the safety system (either within an organisation, a sector, or across the total aviation system) to manage and improve safety performance.

Proactive indicators indicate good safety practices being introduced, developed, and adapted which by their inclusion seek to establish a proactive safety environment that engenders continuous improvement. They provide useful information when accident and incident rates are low to identify latent hazards and potential threats, and consequent opportunities for improvement.

There should always be a connection between a proactive indicator and the unwanted outcomes (or reactive indicators) that their monitoring is intended to warn against.

(3) Predictive indicators (precursor events):

These metrics can be considered as indicators that do not manifest themselves in accidents or serious incidents. They indicate less severe system failures or 'near misses' which when combined with other events may lead to an accident or serious incident.

In a large organisation, a mature safety management system should include all of these measures. Risk management effort, however, should be targeted at leading indicators and precursor events.

AMC1 ADR.OR.D.005(b)(4) Management system

SAFETY RISK ASSESSMENT AND MITIGATION

- (a) A formal safety risk assessment and mitigation process should be developed and maintained that ensures analysis (in terms of probability and severity of occurrence), assessment (in terms of tolerability), and control (in terms of mitigation) of risks.
- (b) The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (a) above, should be specified in the aerodrome manual.

GM1 ADR.OR.D.005(b)(4) Management system

SAFETY RISK ASSESSMENT AND MITIGATION

Safety risk assessment is the analysis of the safety risks of the consequences of the hazards that have been determined. Safety risk analysis breaks down the risks into two components — the probability of occurrence of a damaging event or condition, and the severity of the event or condition, should it occur. Safety risk decision making and acceptance should be specified through a risk tolerability matrix. The definition and final construction of the matrix should be left to the operator to design, be documented in the aerodrome manual, and be subject to an approval by the Competent Authority.

AMC1 ADR.OR.D.005(b)(5) Management system

SAFETY PERFORMANCE MONITORING AND MEASUREMENT

- (a) Safety performance monitoring and measurement should be the process by which the safety performance of the aerodrome operator is verified in comparison to the safety policy and objectives, identified safety risks and the mitigation measures.
- (b) This process should include the setting of safety performance indicators, and measuring the aerodrome operator's safety performance against them.

GM1 ADR.OR.D.005(b)(5) Management system

SAFETY PERFORMANCE MONITORING AND MEASUREMENT

- (a) The performance monitoring and measurement process should include:
 - (1) safety reporting, addressing also the status of compliance with the applicable requirements;
 - (2) safety studies which are rather large analyses encompassing broad safety concerns;
 - (3) safety reviews including trends reviews which are conducted during introduction and deployment of new technologies, change or implementation of procedures, or in situations of structural change in operations, or to explore increase in incidents or safety reports;
 - (4) safety audits which focus in the integrity of the aerodrome operator's management system, and periodically assess the status of safety risk controls;
 - (5) safety surveys, which examine particular elements or procedures of a specific operation, such as problem areas or bottlenecks in daily operations, perceptions and opinions of operational personnel, and areas of dissent or confusion; and
 - (6) internal safety investigations whose scope should extend the scope of occurrences required to be reported to the Competent Authority;
- (b) The following generic aspects/areas could be considered:
 - (1) accountability for management of the operational activities and its ultimate accomplishment;
 - (2) authority to direct, control, or change the procedures, as well as to make key decisions such as safety risk acceptance decisions;
 - (3) procedures for operational activities;
 - (4) controls, including hardware, software, special procedures or procedural steps, and supervisory practices designed to keep operational activities on track;
 - (5) interfaces, including lines of authority between departments, lines of communication between employees, consistency of procedures, and clear delineation of responsibility between organisations, work units, and employees; and
 - (6) process measures to provide feedback to responsible parties that required actions are taking place, required outputs are being produced, and expected outcomes are being achieved.

AMC1 ADR.OR.D.005(b)(6) Management system

THE MANAGEMENT OF CHANGE

The aerodrome operator should manage safety risks related to a change. The management of change should be a documented process to identify external and internal change that may have an adverse effect on safety.

It should make use of the aerodrome operator's existing hazard identification, safety risk assessment, and mitigation processes.

GM1 ADR.OR.D.005(b)(6) Management system

THE MANAGEMENT OF CHANGE

- (a) Change can introduce new hazards, impact the appropriateness and/or effectiveness of existing safety risk mitigation strategies. Changes may be external to the organisation, or internal.
- (b) A formal process for the management of change should take into account the following considerations:
 - (1) criticality of systems and activities;
 - (2) stability of systems and operational environments; and
 - (3) past performance.
- (c) System description is one of the fundamental preliminary activities in the planning of the safety management system, to determine a baseline hazard analysis for the baseline system.

As part of the formal process of the management of change, the system description and the baseline hazard analysis should be reviewed periodically, even if circumstances of change are not present, to determine their continued validity.

When changes to the system are made, and periodically thereafter, the aerodrome operator should go over its system and its actual operational environment, in order to make sure it continues to be fully aware of the circumstances under which the provision of services takes place.

With regard to the management of change and safety assessments related to changes, see also ADR.OR.B.040 and GM1 ADR.OR.B.040(f).

AMC1 ADR.OR.D.005(b)(7) Management system

CONTINUOUS IMPROVEMENT OF THE SAFETY MANAGEMENT SYSTEM

The aerodrome operator should continuously seek to improve its safety performance. The aerodrome operator should develop and maintain a formal process to identify the causes of substandard performance of the safety management system, determine the implications of substandard performance of the safety management system in operations, and eliminate or mitigate such causes. Continuous improvement should be achieved through:

- (a) proactive and reactive evaluation of facilities, equipment, documentation, and procedures;
- (b) proactive evaluation of an individual's performance, to verify the fulfilment of that individual's safety responsibilities; and

- (c) reactive evaluations in order to verify the effectiveness of the system for control and mitigation of safety risks.

GM1 ADR.OR.D.005(b)(7) Management system

CONTINUOUS IMPROVEMENT OF THE SAFETY MANAGEMENT SYSTEM

Continuous improvement of the safety management system, as part of the safety assurance, is achieved through the application of:

- (a) internal evaluations;
- (b) independent audits (both internal and external);
- (c) strict document controls; and
- (d) continuous monitoring of safety controls and mitigation actions.

AMC1 ADR.OR.D.005(b)(8) Management system

SAFETY MANAGEMENT SYSTEM TRAINING

- (a) The aerodrome operator should establish a safety management system training programme for all aerodrome operations, rescue and firefighting, and maintenance personnel, including all management personnel of the aerodrome (e.g. supervisors, managers, senior managers, and the accountable manager), regardless of their level in the aerodrome operator's organisation.
- (b) The amount and level of detail of safety training should be proportionate and appropriate to the individual's responsibility and involvement in the safety management system.
- (c) The safety management system training programme should be developed in accordance with AMC1 ADR.OR.D.017(a), and be incorporated in the training programme foreseen therein.

GM1 ADR.OR.D.005(b)(8) Management system

STAFF SAFETY MANAGEMENT SYSTEM TRAINING REQUIREMENTS

- (a) Operations, rescue and fire-fighting, and maintenance personnel
 - (1) Safety training should address safety responsibilities, including adherence to all operating and safety procedures, and recognising and reporting hazards;
 - (2) The training objectives should include the organisation's safety policy and safety management system fundamentals, and overview;
 - (3) The contents should include:
 - (i) definition of hazards;
 - (ii) consequences and risks;
 - (iii) the safety risk management process, including roles and responsibilities; and
 - (iv) safety reporting and the organisation's safety reporting system(s).
- (b) Managers and supervisors
 - (1) Safety training should address safety responsibilities, including promoting the SMS and engaging operational personnel in hazard reporting;

- (2) In addition to the training objectives established for operational personnel, training objectives for managers and supervisors should include a detailed knowledge of the safety process, hazard identification and safety risk management and mitigation, and change management;
 - (3) In addition to the contents specified for operational personnel, the training contents for supervisors and managers should include safety data analysis.
- (c) Senior managers
- (1) Safety training should include safety responsibilities, including compliance with European Union, national and the organisation's own safety requirements, allocation of resources, ensuring effective inter-departmental safety communication, and active promotion of the safety management system;
 - (2) In addition to the objectives of the two previous employee groups, safety training should include safety assurance and safety promotion, safety roles and responsibilities, and establishing acceptable levels of safety.
- (d) Accountable manager
- The training should provide the accountable manager with a general awareness of the organisation's safety management system, including safety management system roles and responsibilities, safety policy and objectives, safety risk management, and safety assurance.

AMC1 ADR.OR.D.005(b)(9) Management system

SAFETY COMMUNICATION

- (a) The aerodrome operator should communicate safety management system objectives and procedures to all operational personnel, and the safety management system and its application should be evident in all aspects of operations.
- (b) Communication should flow between the safety manager and operational personnel throughout the organisation. The safety manager should communicate the performance of the organisation's safety management system through suitable means. The safety manager should, also, ensure that lessons learned from investigations, safety related events, or other safety related experiences, both internally and from other organisations, are distributed widely.
- (c) Safety communication should aim to:
 - (1) ensure that all staff are fully aware of the safety management system;
 - (2) convey safety-critical information;
 - (3) explain why particular actions are taken; and
 - (4) explain why safety procedures are introduced or changed.

GM1 ADR.OR.D.005(b)(9) Management system

SAFETY COMMUNICATION

- (a) An aerodrome operator, may use the following tools to communicate safety information:
 - (1) Safety Management System Manual;
 - (2) safety processes and procedures;
 - (3) safety newsletters, notices, and bulletins; and
 - (4) websites or emails;
- (b) Regular meetings with personnel where information, actions, and procedures are discussed may be used to communicate safety matters.

AMC1 ADR.OR.D.005(b)(10) Management system

COORDINATION OF THE AERODROME EMERGENCY RESPONSE PLAN

The coordination of the aerodrome emergency response plan, established in accordance with the requirements contained in Part-ADR.OPS, with the safety management system should ensure continuous improvement of the systems and procedures contained within the plan.

GM1 ADR.OR.D.005(b)(10) Management system

COORDINATION OF THE AERODROME EMERGENCY RESPONSE PLAN

Continuous improvement of the systems and procedures contained within the aerodrome emergency response plan may, amongst others, be obtained by:

- (a) conducting a review of the relevant parts of the emergency response plan after a full or partial exercise;
- (b) debriefing and analysing the emergency response operations after an emergency situation; and
- (c) developing new emergency procedures or systems as part of the emergency response plan when new hazards are identified by the safety management system,

to ensure, amongst others, the coordination with the emergency response plans of other interfacing organisations.

AMC1 ADR.OR.D.005(b)(11) Management system

COMPLIANCE MONITORING

- (a) Compliance monitoring
 - (1) The implementation and use of a compliance monitoring process should enable the aerodrome operator to monitor compliance with the relevant requirements of this Part, Part-ADR.OPS, and any other applicable requirements.

The aerodrome operator should specify the basic structure of the compliance monitoring applicable to the activities conducted.

The compliance monitoring should be structured according to the size of organisation and the complexity of the activities to be monitored, including those which have been subcontracted.

Compliance monitoring should include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary.

- (2) An aerodrome operator should monitor compliance with the procedures, it has designed, to ensure safe activities. In doing so, an aerodrome operator should as a minimum, and where appropriate, monitor:
 - (1) organisational structure;
 - (2) plans and objectives;
 - (3) manuals, logs, and records;
 - (4) training standards;
 - (5) required resources; and
 - (6) management system procedures and manuals.
- (b) Organisational set-up
- (1) To ensure that the aerodrome operator continues to meet the requirements of this Part, Part-ADR.OPS and other applicable requirements, a compliance monitoring manager should be nominated (see AMC2-ADR.OR.D.005(11)) by the aerodrome operator. The role of the compliance monitoring manager is to ensure that the activities of the aerodrome operator, are monitored for compliance with the applicable regulatory requirements, and any additional requirements as established by the aerodrome operator, and that these activities are being carried out properly under the supervision of the relevant head of each functional area.
 - (2) The compliance monitoring manager should be responsible for ensuring that the compliance monitoring programme is properly implemented, maintained and continually reviewed and improved.
 - (3) In the case the same person acts as compliance monitoring manager and as safety manager, the accountable manager, with regards to his/her direct accountability for safety, should ensure that sufficient resources are allocated to both functions, taking into account the size of the aerodrome operator, and the nature and complexity of its activities.
 - (4) The independence of the compliance monitoring should be established by ensuring that audits and inspections are carried out by personnel not responsible for the function, procedure, etc. being audited.
- (c) Compliance monitoring documentation
- (1) Relevant documentation should include the relevant part(s) of the aerodrome operator's management system documentation.
 - (2) In addition, relevant documentation should also include the following:
 - (i) terminology;
 - (ii) specified activity standards;
 - (iii) a description of the organisation of the aerodrome operator;
 - (iv) the allocation of duties and responsibilities;
 - (v) procedures to ensure regulatory compliance;
 - (vi) the compliance monitoring programme, reflecting:
 - (A) schedule of the monitoring programme;

- (B) audit procedures;
 - (C) reporting procedures;
 - (D) follow-up and corrective action procedures; and
 - (E) recording system;
- (vii) the training syllabus referred to in (d)(2); and
- (viii) document control.

(d) Training

- (1) Correct and thorough training is essential to optimise compliance in every aerodrome operator. In order to achieve significant outcomes of such training, the operator should ensure that all personnel understand the objectives as laid down in the operator's management system documentation.
- (2) The staff responsible for managing the compliance monitoring mechanism should receive training on this task. Such training should cover the requirements of compliance monitoring, manuals and procedures related to the task, audit techniques, reporting, and recording.
- (3) Time should be provided to train all personnel involved in compliance management, and for briefing the remaining personnel.
- (4) The allocation of time and resources should be governed by the volume and complexity of the activities concerned.

(e) Auditors

Auditors used for compliance monitoring audits and inspections should be able to demonstrate relevant knowledge, background and appropriate experience related to the activities of the aerodrome operator, including knowledge and experience in compliance monitoring.

(f) Compliance monitoring – audit scheduling

- (1) A defined audit schedule and a periodic review cycle for each area should be. The compliance monitoring itself should also be audited according to a defined audit schedule. The schedule should allow for unscheduled audits when trends are identified. Follow-up audits should be scheduled to verify that corrective action was carried out, and that it was effective and completed, in accordance with the policies and procedures specified in the aerodrome manual.
- (2) A schedule of audits to be completed during a specified calendar period should be established. All aspects of the aerodrome and its operation should be audited within the first 12 months since the date of the issuance of the certificate. After that, an audit or a series of audits should be conducted within a maximum period of 36 months, to cover the whole aerodrome and its operation in a manner, and at intervals set out in the aerodrome manual unless the Competent Authority requires further audits.

AMC2 ADR.OR.D.005(b)(11) Management system

COMPLIANCE MONITORING MANAGER

- (a) The compliance monitoring manager should:

- (1) act independently of other managers within the organisation, and should have direct access to the accountable manager and to appropriate management for safety matters. The compliance monitoring manager should be responsible to the accountable manager;
 - (2) not be one of the persons referred to in ADR.OR.D.015(b) or ADR.OR.D.015(c), except that in less complex aerodrome organisation/operations, this task may also be exercised by the accountable manager or the person referred to in ADR.OR.D.015(c), provided he/she has demonstrated having the related competence as defined in paragraph (b); and
 - (3) have access to all parts of the organisation, and as necessary, any contracted organisation.
- (b) The compliance monitoring manager should have:
- (1) adequate practical experience and expertise in aerodrome operations, or maintenance, or similar area;
 - (2) adequate knowledge of safety and quality assurance principles and management;
 - (3) knowledge of the aerodrome manual; and
 - (4) comprehensive knowledge of the applicable requirements in the area of aerodrome.

GM1 ADR.OR.D.005(b)(11) Management system

COMPLIANCE MONITORING – GENERAL

- (a) The organisational set-up of the compliance monitoring should reflect the size of the aerodrome operator, and the nature and complexity of its activities. The compliance monitoring manager may perform all audits and inspections himself/herself, or appoint one or more auditors by choosing personnel having the related competence as defined in paragraph (e) of AMC1 ADR.OR.D.005(b)(11) either from within, or outside the aerodrome operator.
- (b) Regardless of the option chosen, it must be ensured that the independence of the audit function is not affected, in particular, in cases where those performing the audit or inspection are also responsible for other functions for the aerodrome operator.
- (c) In case external personnel are used to perform compliance audits or inspections:
 - (1) any such audits or inspections are performed under the responsibility of the compliance monitoring manager; and
 - (2) the aerodrome operator remains responsible to ensure that the external personnel has relevant knowledge, background, and experience as appropriate to the activities being audited or inspected, including knowledge and experience in compliance monitoring.
- (d) The aerodrome operator retains the ultimate responsibility for the effectiveness of the compliance monitoring, in particular for the effective implementation and follow-up of all corrective actions.

AMC1 ADR.OR.D.005(c) Management system

AERODROME OPERATOR MANAGEMENT SYSTEM DOCUMENTATION

The aerodrome operator should ensure that the documented management system key processes include a process for making personnel aware of their responsibilities, as well as its amendment procedure.

The aerodrome operator's management system documentation should, at least, include the following information:

- (a) a statement signed by the accountable manager to confirm that the aerodrome operator will continuously work in accordance with the applicable requirements and the operator's documentation;
- (b) the aerodrome operator's scope of activities;
- (c) the titles and names of persons referred to in ADR.OR.D.015 and AMC2-ADR.OR.D.005(b)(11);
- (d) an organisation chart showing the lines of responsibility between the nominated persons;
- (e) a general description and location of the facilities;
- (f) procedures specifying how the aerodrome operator ensures compliance with the applicable requirements;
- (g) the amendment procedure for the operator's management system documentation; and
- (h) safety management system outputs.

AMC2 ADR.OR.D.005(c) Management system

AERODROME OPERATOR SAFETY MANAGEMENT MANUAL

- (a) In cases where safety management is set out in a Safety Management Manual, it should be the key instrument for communicating the approach to safety for the aerodrome operator. The Safety Management Manual should document all aspects of safety management, including the safety policy, objectives, procedures, and individual safety responsibilities.
- (b) The contents of the Safety Management Manual should include:
 - (1) scope of the safety management system;
 - (2) safety policy and objectives;
 - (3) safety responsibilities of key safety personnel;
 - (4) documentation control procedures;
 - (5) safety assessment process, including hazard identification and risk management schemes;
 - (6) monitoring of implementation and effectiveness of safety actions, and risk mitigation measures;
 - (7) safety performance monitoring;
 - (8) safety reporting (including hazard reporting) and investigation;
 - (9) coordination of emergency response planning;
 - (10) management of change (including organisational changes with regard to safety responsibilities);

- (11) safety promotion; and
- (12) safety management system outputs.

GM1 ADR.OR.D.005(c) Management system

AERODROME OPERATOR MANAGEMENT SYSTEM DOCUMENTATION

It is not required to duplicate information in several manuals. The Safety Management Manual is considered to be a part of the aerodrome manual.

AMC1 ADR.OR.D.007(a) Management of aeronautical data and aeronautical information

QUALITY MANAGEMENT SYSTEM

- (a) A quality management system supporting the origination, production, storage, handling, processing, transfer, and distribution of aeronautical data and aeronautical information should:
 - (1) define the quality policy in such a way as to meet the needs of different users as closely as possible;
 - (2) set up a quality assurance programme that contains procedures designed to verify that all operations are being conducted in accordance with the applicable requirements, standards and procedures, including the relevant requirements of Part-ADR.OPS;
 - (3) provide evidence of the functioning of the quality system by means of manuals and monitoring documents;
 - (4) appoint management representatives to monitor compliance with, and adequacy of, procedures to ensure safe and efficient operational practices; and
 - (5) perform reviews of the quality system in place, and take remedial actions, as appropriate.
- (b) An EN ISO 9001 certificate, issued by an appropriately accredited organisation, is considered as an Acceptable Means of Compliance.

GM1 ADR.OR.D.007(a) Management of aeronautical data and aeronautical information

An aerodrome operator does not need to duplicate functions and activities in order to discharge the responsibilities related to the management of aeronautical data and aeronautical information provision activities.

In this respect, the compliance monitoring may be used for the purposes of ensuring compliance with the relevant requirements for management of aeronautical data and aeronautical information provision activities.

AMC2 ADR.OR.D.007(b) Management of aeronautical data and aeronautical information

SECURITY MANAGEMENT FOR AERONAUTICAL DATA AND AERONAUTICAL INFORMATION PROVISION ACTIVITIES

- (a) The security management objectives should be:
- (1) to ensure the security of aeronautical data and aeronautical information received, produced, or otherwise employed so that it is protected from interference, and access to it is restricted only to those authorised; and
 - (2) to ensure that the security management measures meet appropriate national, EU, or international requirements for critical infrastructure and business continuity, and international standards for security management, including:
 - (i) ISO/IEC 17799:2005 — Information technology — Security techniques — Code of practice for information security management
 - (ii) ISO 28000:2007: — Specification for security management systems for the supply chain.
- (b) Regarding the ISO standards, the relevant certificates issued by an appropriately accredited organisation, are considered as an Acceptable Means of Compliance.

AMC1 ADR.OR.D.010 Contracted activities

RESPONSIBILITY WHEN CONTRACTING ACTIVITIES

- (a) An aerodrome operator may contract certain activities to external organisations.
- (b) A written agreement should exist between the aerodrome operator and the contracted organisation, clearly defining the contracted activities and the applicable requirements.
- (c) The contracted safety related activities relevant to the agreement should be included in the operator's safety management and compliance monitoring programmes.
- (d) The aerodrome operator should ensure that the contracted organisation has the necessary authorisation, declaration, or approval when required, and commands the resources and competence to undertake the task; to this end, a prior audit of the contracted party should be conducted to ensure that the contracted organisation meets the applicable requirements, and the requirements specified by the aerodrome operator's itself.

GM1 ADR.OR.D.010 Contracted activities

CONTRACTING — GENERAL

- (a) Contracted activities to external organisations for the provision of services may include areas such as:
- (1) maintenance of the aerodrome and equipment;
 - (2) surveying for aeronautical data;
 - (3) apron management services;
 - (4) training;
 - (5) rescue and firefighting services;
 - (6) aerodrome design, etc.

- (b) In case of contracted activities, the aerodrome operator should define relevant management responsibilities within its own organisation.
- (c) The ultimate responsibility for the product or service provided by external organisations should always remain with the aerodrome operator.

GM2 ADR.OR.D.010 Contracted activities

RESPONSIBILITY WHEN CONTRACTING ACTIVITIES

- (a) Regardless of the approval status of the contracted organisation, the contracting operator is responsible to ensure that all contracted activities are subject to hazard identification, risk assessment and mitigation, as well as compliance monitoring.
- (b) When the contracted organisation is itself certified to carry out the contracted activities, the aerodrome operator's compliance monitoring should at least check that the approval effectively covers the contracted activities, and that it is still valid.

AMC1 ADR.OR.D.015(a) Personnel requirements

ACCOUNTABLE MANAGER

- (a) Accountable Manager — General
 - (1) The accountable manager should:
 - (i) ensure that all necessary resources are available to operate the aerodrome in accordance with the applicable requirements and the aerodrome manual;
 - (ii) ensure that if there is a reduction in the level of resources or abnormal circumstances which may affect safety, the required reduction in the level of operations at the aerodrome is implemented;
 - (iii) establish, implement, and promote the safety policy; and
 - (iv) ensure compliance with relevant applicable requirements , certification basis, and the organisation's safety management system, as well as its quality management system with regard to aeronautical data and aeronautical information provision activities.
 - (2) The accountable manager should have:
 - (i) an appropriate level of authority within the aerodrome operator's organisation to ensure that activities are financed and carried out to the standard required;
 - (ii) knowledge and understanding of the documents that prescribe relevant aerodrome safety standards;
 - (iii) understanding of the requirements for competence of aerodrome management personnel, so as to ensure that competent persons are in place;
 - (iv) knowledge and understanding of safety, quality, and security management systems related principles and practices, and how these are applied within the organisation;
 - (v) knowledge of the role of the accountable manager; and
 - (vi) knowledge and understanding of the key issues of risk management within the aerodrome.
- (b) Accountable manager — Delegation of responsibilities

- (1) The technical knowledge and understanding expected by an accountable manager is high level, with particular reference to his/her own role in ensuring that standards are maintained.
- (2) During periods of absence, the day-to-day responsibilities of the accountable manager may be delegated; however, the accountability ultimately remains with the accountable manager.
- (3) Depending on the size and the complexity of operations, the accountable manager may delegate his/her responsibilities in the area of training, by nominating a training manager whose responsibilities should be the establishment, coordination, implementation, and relevant record keeping of personnel training, as well as proficiency check programmes.

In any case, the accountability, ultimately, remains with the accountable manager.

GM1 ADR.OR.D.015(a) Personnel requirements

ACCOUNTABLE MANAGER

Depending on the size, structure and complexity of the organisation, the accountable manager may be:

- (a) the chief executive officer (CEO);
- (b) the chief operating officer (COO);
- (c) the chairperson of the board of directors;
- (d) a partner; or
- (e) the proprietor.

The appointment of an accountable manager who is given the required authorities and responsibilities, requires that the individual has the necessary attributes to fulfil the role. The accountable manager may have more than one function in the organisation. Nonetheless, the accountable manager's role is to instil safety as a core organisational value, and to ensure that the safety management system is properly implemented and maintained through the allocation of resources and tasks.

AMC1 ADR.OR.D.015(b) Personnel requirements

NOMINATED PERSONS

- (a) General
 - (1) A description of the functions of the nominated persons, including their names, as well as clearly defined responsibilities and authorisations, should be contained in the aerodrome manual. Nominated persons should have adequate resources available to perform their duties.
 - (2) The aerodrome operator should make arrangements to ensure adequate continuity of supervision in the absence of nominated persons.
 - (3) The person nominated by the aerodrome operator should not be nominated by another aerodrome operator, unless agreed with the Competent Authority.

- (4) Persons nominated should be foreseen to work sufficient hours to fulfil the management functions associated with the scale and complexity of the operation.
 - (5) A nominated person may hold more than one of the nominated posts if such an arrangement is considered suitable and properly matched to the aerodrome operator's organisation, and the complexity of its operations.
- (b) Competence of nominated persons
- The manager of Operational Services and the Maintenance manager should have:
- (1) adequate practical experience and expertise in aerodrome operations or maintenance (or similar area) respectively;
 - (2) comprehensive knowledge of the applicable requirements in the area of aerodromes;
 - (3) appropriate level of knowledge of safety and quality management; and
 - (4) knowledge of the aerodrome manual.

GM1 ADR.OR.D.015(b) Personnel requirements

COMBINATION OF NOMINATED PERSONS RESPONSIBILITIES

- (a) The acceptability of a single person holding more than one post, possibly in combination with being the accountable manager, should depend upon the aerodrome operator's organisation, and the complexity of its operations. The two main areas of concern should be competence, and an individual's capacity to meet his/her responsibilities.
- (b) As regards competence in different areas of responsibility, there should not be any difference from the requirements applicable to persons holding only one post.
- (c) The capacity of an individual to meet his/her responsibilities should primarily be dependent upon the complexity of the aerodrome operator's organisation and its operations. However, the complexity of the aerodrome operator's organisation, or of its operation may prevent, or limit, combinations of posts.

AMC1 ADR.OR.D.015(c) Personnel requirements

SAFETY MANAGER

- (a) The safety manager should be the focal point and responsible for the development, administration, and maintenance of an effective safety management system (see also AMC1-ADR.OR.D.005(b)(1)).
- (b) The role of the safety manager should be to:
 - (1) facilitate hazard identification, risk analysis, and management;
 - (2) monitor the implementation and functioning of the safety management system, including the necessary safety actions;
 - (3) manage the safety reporting system of the aerodrome;
 - (4) provide periodic reports on safety performance;
 - (5) ensure maintenance of safety management documentation;
 - (6) ensure that there is safety management training available, and that it meets acceptable standards;
 - (7) provide advice on safety matters; and

- (8) initiate and participate in internal occurrence/accident investigations.
- (c) The safety manager should have:
- (1) adequate practical experience and expertise in aerodrome operations, or maintenance, or similar area;
 - (2) adequate knowledge of safety and quality management;
 - (3) adequate knowledge of the aerodrome manual; and
 - (4) comprehensive knowledge of the applicable requirements in the area of aerodromes.
- (d) The safety manager should not be one of the persons referred to in ADR.OR.D.015(b) or AMC2 ADR.OR.D.005(b)(11). However, in the case of less complex aerodrome organisations/operations, the safety manager may be the accountable manager, or one of the persons referred to in ADR.OR.D.015(b), or AMC2 ADR.OR.D.005(b)(11), or any other person at appropriate management level, provided that he/she can act independently of other managers within the organisation of the aerodrome operator, and has direct access to the accountable manager and to appropriate management for safety matters.

AMC1 ADR.OR.D.015(d) Personnel requirements

DETERMINATION OF PERSONNEL NEEDS AND QUALIFICATIONS

- (a) The aerodrome operator should determine the required personnel for the planned tasks.
- (b) The aerodrome operator should determine the required personnel qualifications, in accordance with the applicable requirements (and the national and European Union legislation where applicable), and include them in the aerodrome manual. A documented system with defined responsibilities should be in place, in order to identify any needs for changes with regard to personnel qualifications.

GM1 ADR. OR.D.015 (d) Personnel requirements

QUALIFICATION OF PERSONNEL

The term 'qualified' denotes fitness for the purpose. This may be achieved through fulfilment of the necessary conditions such as completion of required training, or acquisition of a diploma or degree, or through the gaining of suitable experience. It, also, includes the ability, capacity, knowledge, or skill that matches or suits an occasion, or makes someone eligible for a duty, office, position, privilege, or status.

Certain posts may, by nature, be associated with the possession of certain qualifications in a specific field (e.g. rescue and firefighting, civil, mechanical or electrical engineering, wildlife biology, etc.). In such cases, the person occupying such a post is expected to possess the necessary qualifications at a level that is in accordance with the applicable national or European Union legislation.

AMC1 ADR.OR.D.017(a) Personnel Requirements

TRAINING PROGRAMME — GENERAL

- (a) The training programme should cover all personnel:

- (1) involved in the operation, rescue and firefighting, maintenance, and management of the aerodrome (supervisors, managers, senior managers, and the accountable manager); and
 - (2) those persons operating unescorted on the movement area, and other operational areas of the aerodrome, related to other organisations which operate or provide services at the aerodrome,
- regardless of their level in the organisation.
- (b) The training of persons mentioned in paragraph (a) should be completed prior to the initial performance of their duties, or allowing them unescorted access on the movement area and other operational areas of the aerodrome, as appropriate.
 - (c) The training programme should include safety management system training whose level of detail should be appropriate to the individual's responsibility and involvement in the safety management system; for persons referred to in paragraph (a)(1), it should also include human and organisational factors; for those persons referred to in paragraph under (a)(2) employed by other organisations operating, or providing services at the aerodrome, the safety management system training may cover only the necessary elements (e.g. relevant procedures, safety reporting system, aerodrome safety programmes, etc.).
 - (d) The training programme should consist of the following:
 - (1) a process to identify training standards, including syllabi, and frequency for each type of training and area of activity for the persons mentioned in paragraph (a), including for instructors and assessors, and track completion of required training;
 - (2) a validation process that measures the effectiveness of training;
 - (3) initial job-specific training;
 - (4) on-the-job training; and
 - (5) recurrent training.
 - (e) The training programme should identify training responsibilities and contain procedures:
 - (1) for training and checking of the trainees;
 - (2) to be applied in the event that personnel do not achieve or maintain the required standards.
 - (f) Training contents and syllabi should comply with the requirements prescribed in Part-ADR.OPS.
 - (g) A training file should be developed for each employee, including management, to assist in identifying and tracking employee training requirements, and verifying that personnel have received the planned training.
 - (h) Information related to paragraphs (d) and (e), including the identified training standards and the related syllabi and frequency, should be included in the aerodrome manual.

GM1 ADR.OR.D.017(a) Personnel requirements

TRAINING PROGRAMME — RECURRENT, REFRESHER, AND DIFFERENCES TRAINING

- (a) Recurrent training
 - (1) The initial training programme should be valid for a period not exceeding 12 months. Thereafter, the aerodrome operator should ensure that the persons mentioned under paragraph (a) of AMC1 ADR.OR.D.017(a) complete recurrent

training at intervals not exceeding 12 months since the initial completion of their training programme.

- (2) If the recurrent training is undertaken within the last 3 calendar months of the 12-month period, the new validity period should be counted from the original expiry date.

(b) Refresher training

When a person mentioned under paragraph (a) of AMC1 ADR.OR.D.017(a) has not performed any duties for a significant period before the expiry date of its initial training programme, or its last recurrent training (as the case may be), the aerodrome operator should ensure that that person completes a relevant refresher training prior to:

- (1) being assigned duties; or
- (2) being allowed unescorted access on the movement area and other operational areas of the aerodrome, as appropriate.

(c) Differences training – same aerodrome operator

The aerodrome operator should ensure that personnel mentioned under paragraph (a)(1) of AMC1 ADR.OR.D.017(a) who have already completed the necessary training programme, and are to be assigned to different duties, complete an appropriate training which covers any differences between their previous and future duties. The differences training should be determined, as necessary, on the basis of a comparison of the required training programme with the training programme already completed by the relevant personnel, taking into account the personnel's previous training as documented in his/her training records.

(d) Differences training – other aerodrome operator

When a person mentioned under paragraph (a)(1) of AMC1 ADR.OR.D.017(a) who has already completed the necessary training programme, is employed by another aerodrome operator, the latter may establish a differences training for that person to complete. Such a differences training should be determined, as necessary, on the basis of a comparison of the training already completed by the relevant person, (taking into account its previous training as documented in his/her training records) with the training programme that is required for the post that the person will cover. In any case, such a differences programme should not give credit for training areas which are aerodrome specific.

AMC2 ADR.OR.D.017(a) Personnel requirements

TRAINING PROGRAMME – CHECKING OF TRAINEES

- (a) Checking required for each training course should be accomplished by the method appropriate to the training element to be checked.
- (b) Training elements that require individual practical participation may be combined with practical checks.

GM2 ADR.OR.D.017(a) Personnel requirements

TRAINING PROGRAMME – CHECKING OF TRAINEES

The methods to be used for the checking of the trainees could include:

- (a) practical demonstration,

- (b) computer-based assessment,
 - (c) oral or written tests,
- or combinations of such methods, as appropriate.

AMC1 ADR.OR.D.017(b) Personnel requirements

INSTRUCTORS – ASSESSORS

- (a) The aerodrome operator should nominate instructors and assessors to be used for the implementation of the training and proficiency check programmes. The personnel to be nominated may also include contracted instructors for individual subjects.
The aerodrome operator may also nominate personnel proposed by organisations operating or providing services at the aerodrome to be used as instructors and assessors for the implementation of the respective part of the training and proficiency check programmes of these organisations' personnel. In any case, the responsibility to ensure the proper implementation of the programme is with the aerodrome operator.
- (b) A person may be qualified and nominated both as an instructor and as an assessor by the aerodrome operator. However, such a person may not provide assessment for own instruction, courses, or material.
- (c) Instructors
 - (1) Theoretical instruction should be given by appropriately qualified instructors. They should have:
 - (i) appropriate level and depth of knowledge in the field where instruction is to be given;
 - (ii) documented ability to use appropriate instructional techniques; and
 - (iii) adequate experience in the subject where instruction is to be given.
 - (2) Instruction on practical skills should be given by appropriately qualified instructors who:
 - (i) meet the theoretical knowledge, and the working experience requirements appropriate to the instruction being given;
 - (ii) have demonstrated the ability to instruct, and to use appropriate instructional techniques;
 - (iii) are proficient in instructional techniques in the areas in which it is intended to provide instruction; and
 - (iv) receive regular refresher training to ensure that the instructional competences are maintained.
- (d) Assessors

The persons who are responsible for assessing the competence and skills of the personnel should:

 - (1) have demonstrated the ability to assess the performance of, and conduct tests and checks in the areas covered by the training;
 - (2) receive regular refresher training to ensure that the assessment standards are maintained up to date; and
 - (3) meet the theoretical knowledge requirements appropriate to the instruction being given and have adequate working experience in the area of instruction.

AMC1 ADR.OR.D.017(c)(1) Personnel requirements

DISTRIBUTION OF RULES AND PROCEDURES

- (a) The aerodrome operator should have a system in place to distribute the rules and procedures to personnel to exercise their duties.
- (b) Proficiency checks should verify that personnel are aware of the rules and procedures relevant to their duties.

GM1 ADR.OR.D.015(c)(1) Personnel requirements

DISTRIBUTION MEANS OF RULES AND PROCEDURES

The aerodrome operator may use electronic means, or conventional means to distribute rules and procedures to personnel. The method used should verify that the information reached the intended recipient.

GM1 ADR.OR.D.017(c)(3) Personnel requirements

PROFICIENCY CHECKS

- (a) Proficiency checks should be conducted by nominated assessors in accordance with AMC1 ADR.OR.D.017(b).
- (b) The maximum interval between two proficiency checks should not exceed:
 - (1) 12 calendar months for rescue and firefighting personnel; and
 - (2) 24 months for all other personnel.

The first proficiency check should be completed within:

- (1) the first year since the completion of the initial training programme, for rescue and firefighting personnel;
- (2) two years since the completion of the initial training programme, for all other personnel.
- (c) The proficiency check programme should include a validation process that measures the effectiveness of the programme.
- (d) The proficiency check programme should identify checking responsibilities and relevant checking methods, including procedures to be applied in the event that personnel do not achieve the required standards.
- (e) Information related to the proficiency check programme should be included in the aerodrome manual.

GM2 ADR.OR.D.017(c)(3) Personnel requirements

PROFICIENCY CHECKS

The purpose of the proficiency check is to establish the ability of an individual to perform satisfactorily, in accordance with applicable requirements and the content of the aerodrome manual. To this end, the elements that each proficiency check should cover should be identified.

A proficiency check does not need to cover all associated elements at the same time; however, all elements of a proficiency check should be covered within the period specified in GM1 ADR.OR.D.017(c)(3).

The person(s) to be checked should be aware about the relevant procedure.

Proficiency checks may be conducted during normal and/or abnormal/emergency conditions depending on the situation and the specialty of the person being checked.

AMC1 ADR.OR.D.017(d) Personnel requirements

PERSONNEL RECORDS

- (a) The aerodrome operator should use its record keeping system (see AMC1 ADR.OR.D.035) to record the following information for each person:
- (1) starting date of employment/ending date of employment (if applicable);
 - (2) area of activity;
 - (3) previous working experience;
 - (4) qualifications;
 - (5) training (before entry and subsequent); and
 - (6) proficiency checks, including language proficiency as appropriate;
- (b) Latest changes should be reflected into personnel records.

GM1 ADR.OR.D.017(d) Personnel requirements

TRAINING RECORDS

- (a) Training programme — general
- The aerodrome operator should maintain records of the training sessions that it has provided, including as a minimum the following:
- (1) area of training and subjects covered;
 - (2) names of participants;
 - (3) date and duration of training; and
 - (4) name of the instructor.
- (b) Training records of individuals
- The training records maintained for each individual should include as a minimum:
- (1) the name of the trainee;
 - (2) the date(s) and the duration of the training;
 - (3) the place where the training was received;
 - (4) the name of the organisation that provided the training;
 - (5) the subjects covered, and the methodology of the course;
 - (6) any comments made by the instructor if applicable;
 - (7) the performance evaluation of the trainee if applicable; and
 - (8) the name and signature of the instructor.

GM2 ADR.OR.D.017(d) Personnel requirements

PROFFICIENCY CHECK RECORDS

The proficiency check records maintained for each individual should include as a minimum:

- (a) the name of the person checked;
- (b) the date(s) and the duration of the proficiency check;
- (c) the methodology of the check conducted;
- (d) any comments made by the assessor;
- (e) the performance evaluation of the person checked; and
- (f) the name and signature of the assessor.

GM1 ADR.OR.D.020(a) Facilities requirements

FACILITIES TO BE PROVIDED

Facilities should be provided to allow the performance of all tasks and activities in accordance with the applicable requirements. This includes, but is not limited to:

- (a) adequate offices, working space, and office equipment;
- (b) personnel protective equipment;
- (c) equipment necessary for inspecting the aerodrome and its facilities, such as clinometers, distance measurement devices, etc.; and
- (d) access to data sources necessary for the development and effective functioning of the safety management system and compliance monitoring of the aerodrome.

AMC1 ADR.OR.D.020(b) Facilities requirements

Designated areas may vary and include facilities such as cargo areas, or even open-air areas.

Aircraft stands should also be designated for aircrafts that carry dangerous goods.

GM1 ADR.OR.D.025 Coordination with other organisations

COORDINATION OF SAFETY PROCEDURES

Coordination and interface with the safety procedures of other relevant organisations that are active at the aerodrome include, but is not limited to the following: aircraft operators, air navigation service providers, providers of apron management services, ground handling service providers, providers of services to persons with reduced mobility, aircraft maintenance organisations, flying training organisations, public authorities that operate on the movement area, as well as other organisations that perform activities independently at the aerodrome.

GM2 ADR.OR.D.025 Coordination with other organisations

COMPLIANCE OF OTHER ORGANISATIONS

In order to ensure compliance of the organisations operating or providing services at the aerodrome, with the requirements of Regulation (EC) No 216/2008 and its Implementing Rules

that are applicable to aerodromes and their operators, as well as with the content of the aerodrome manual, the aerodrome operator should:

- (a) conduct audits and inspections of such organisations through its compliance monitoring ; and
- (b) establish procedures for the monitoring of related activities at the aerodrome.

AMC1 ADR.OR.D.027 Safety programmes

SAFETY PROGRAMMES – AERODROME SAFETY COMMITTEES

- (a) The aerodrome operator should:
 - (1) organise, coordinate and implement programmes to promote safety at the aerodrome. Such programmes include, but are not limited to:
 - (i) runway safety;
 - (ii) apron safety; and
 - (iii) FOD prevention;
 - (2) coordinate and promote the exchange of information, and the joint investigation of occurrences, serious incidents, and accidents.
- (b) The aerodrome operator should establish, coordinate, and lead local safety committees , including a Local Runway Safety Team, dealing in particular with runway safety, apron safety, and the safety of the operations at the aerodrome in general. All relevant organisations operating or providing services at the aerodrome should participate to such safety committees.

The local safety committees should convene regularly, identify and review local safety issues, and examine possible solutions, and need for action. Minutes of such meetings should be kept. Procedures relevant to the functioning of local safety committees should be included in the aerodrome manual.

AMC2 ADR.OR.D.027 Safety programmes

HOT SPOTS

Once hot spots have been identified at an aerodrome, suitable strategies should be implemented to remove the hazard and, when this is not immediately possible, to manage and mitigate the risk, including the publication of HOT SPOT charts in the Aeronautical Information Publication.

GM1 ADR.OR.D.027 Safety programmes

AERODROME SAFETY COMMITTEES

- (a) Manoeuvring area/Apron Safety Committee
 - (1) The aerodrome operator should establish (a) Manoeuvring area/Apron Safety Committee(s);
 - (2) The Manoeuvring area/Apron Safety Committee(s) should have an advisory role to the aerodrome operator;
- (b) Management of Manoeuvring area /Apron Safety Committee(s)

- (1) The Manoeuvring area /Apron Safety Committee(s) should be chaired by an aerodrome operator's official, responsible for aerodrome operations; and
- (2) The aerodrome operator's safety manager should act as the secretary of the Committee(s).

(c) Composition of Manoeuvring area /Apron Safety Committee(s)

Participation should include, but not limited to representatives of:

- (1) aerodrome users active in flight operations;
- (2) aircraft ground handling services providers;
- (3) aerodrome rescue and firefighting services;
- (4) aerodrome operations;
- (5) aerodrome wildlife management;
- (6) aerodrome maintenance; and
- (7) air navigation service provider(s).

(d) Tasks

The tasks of the Manoeuvring area /Apron Safety Committee(s) should be:

- (1) to receive and evaluate reports on operational safety issues;
- (2) to receive reports and statistical information on accidents and incidents, and propose solutions;
- (3) to advise on movement area/apron safety issues such as:
 - (i) promotion of apron safety discipline;
 - (ii) FOD prevention;
 - (iii) developing measures for safety operations;
 - (iv) considering actions to resolve movement area safety problems;
 - (v) apron equipment issues;
 - (vi) adherence to vehicle traffic issues;
 - (vii) new and/or updated safety instructions;
 - (viii) personal protective clothing/equipment issues;
 - (ix) methods to develop and promote apron safety awareness initiatives,
 - (x) snow and ice clearance issues;
 - (xi) proposed aerodrome works;
 - (xii) proposed changes/developments to the movement area;
 - (xiii) standard operating procedures, etc.

GM2 ADR.OR.D.027 Safety programmes

LOCAL RUNWAY SAFETY TEAM

(a) Context

As part of its runway safety programme, the aerodrome operator should establish and lead a Local Runway Safety Team and act on local runway safety issues, including runway incursion prevention.

A runway incursion is defined as '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.'

(b) Local Runway Safety Team composition

Participation should include representatives from all interested parties with direct involvement in runway operations at the aerodrome, including, but is not limited, to:

- (1) aerodrome operations;
- (2) aerodrome engineering and maintenance;
- (3) air navigation service providers;
- (4) aircraft operators that operate of the aerodrome;
- (5) aerodrome rescue and firefighting services;
- (6) drivers having access on the manoeuvring area.

(c) Role

The role of the Local Runway Safety Team should be to advise the appropriate management on potential runway safety issues, and to recommend mitigating measures.

(d) Tasks

The Local Runway Safety Team may have the following tasks:

- (1) identification of potential runway safety issues, including the need for establishment of hot spots or other problem areas at the aerodrome and the review of the relevant entries of the AIP;
- (2) developing and running local awareness campaigns that focus on local issues, for example, producing and distributing local hot spot maps, or other guidance material considered as necessary;
- (3) assisting in verifying that communications between air traffic controllers, or other Air Traffic Services personnel, pilots, and vehicle drivers are satisfactory;
- (4) making observations on a regular basis in different weather and light conditions to assess whether all visual aids are adequate and understandable by all parties concerned, or identify potential aerodrome design issues;
- (5) understanding the operating difficulties of personnel working in other areas, and recommending areas for improvement;
- (6) development of joint training programmes on runway incursion prevention; and
- (7) provide advice prior to the implementation of changes to the aerodrome to identify potential for runway incursion.

GM3 ADR.OR.D.027 Safety programmes

HOT SPOTS

A hot spot is defined as 'a location on an aerodrome movement area with a history, or potential risk of collision, or runway incursion, and where heightened attention by pilots/drivers is necessary.'

Strategies to manage and mitigate the risk from hot spots, depending on the case, may include, but are not limited to:

- (a) awareness campaigns;
- (b) additional visual aids (signs, markings, and lighting);
- (c) establishment of alternative routings;
- (d) introducing changes to the design of parts of the aerodrome; and
- (e) the mitigation of blind spots in the aerodrome control tower.

Aerodrome charts showing hot spots should be produced locally, checked regularly for accuracy, revised as needed, distributed locally, and published in the AIP. The criteria used to establish and chart a hot spot are contained in the PANS-ATM (Chapter 7) and Annex 4 – Aeronautical Charts (Chapters 13, 14 and 15).

Examples of how hot spots are shown on charts are provided in Figures 1, 2, and 3 below.

CRD to NPA 2011-20 (B.II)
 AMC/GM to Annex II – Part-OR
 SUBPART D – MANAGEMENT (ADR.OR.D)

26 Nov 2012

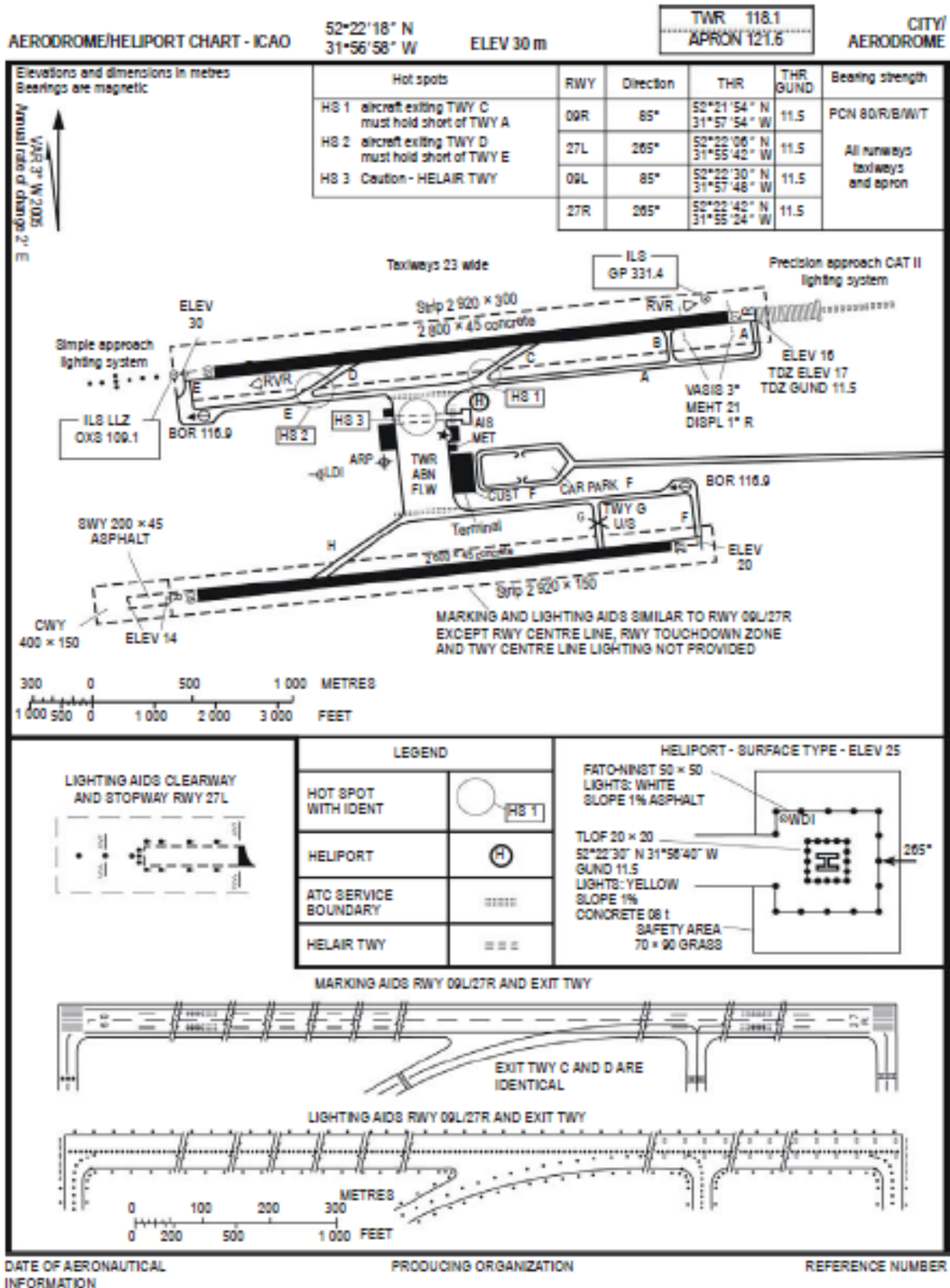


Figure 1

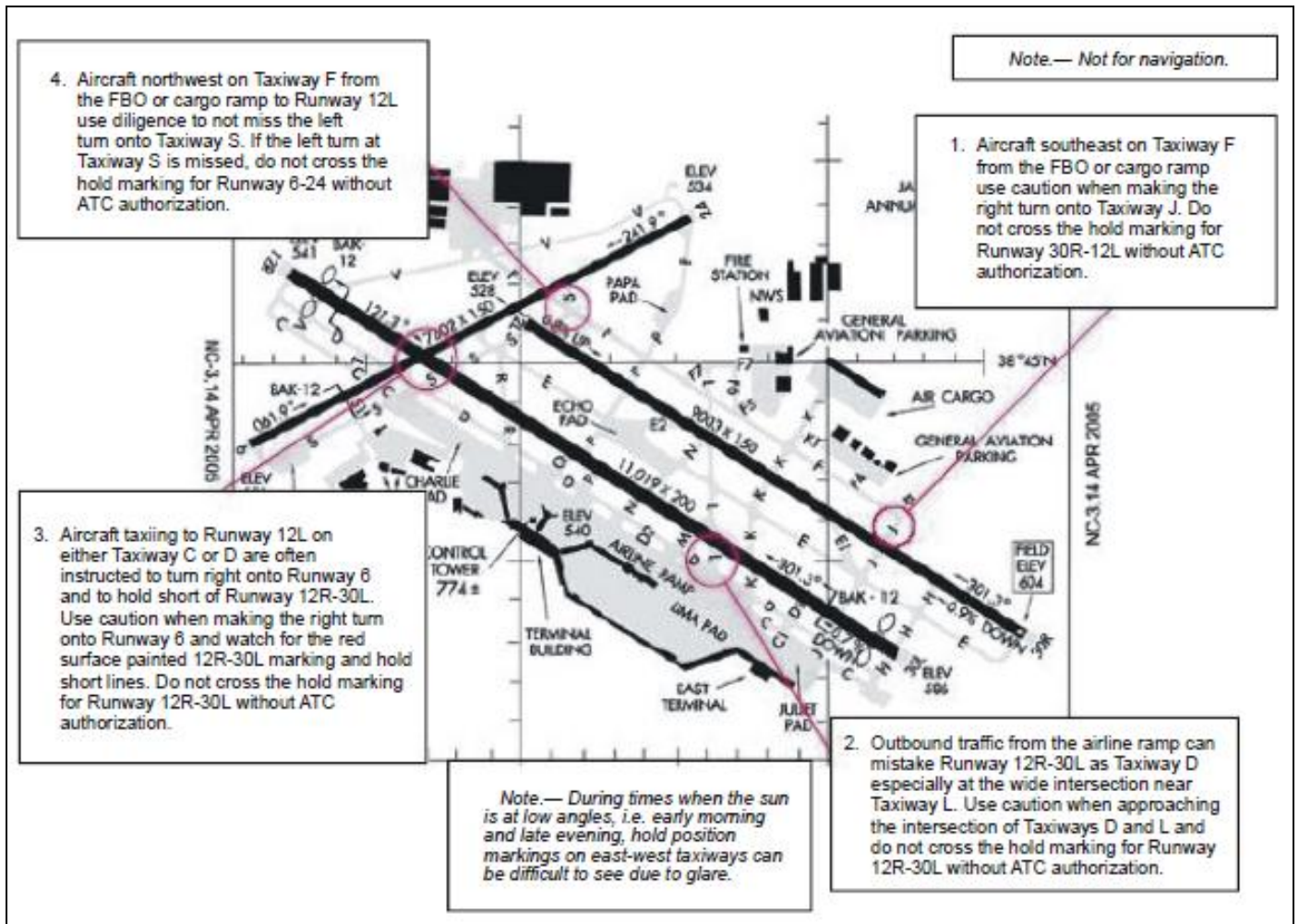


Figure 2

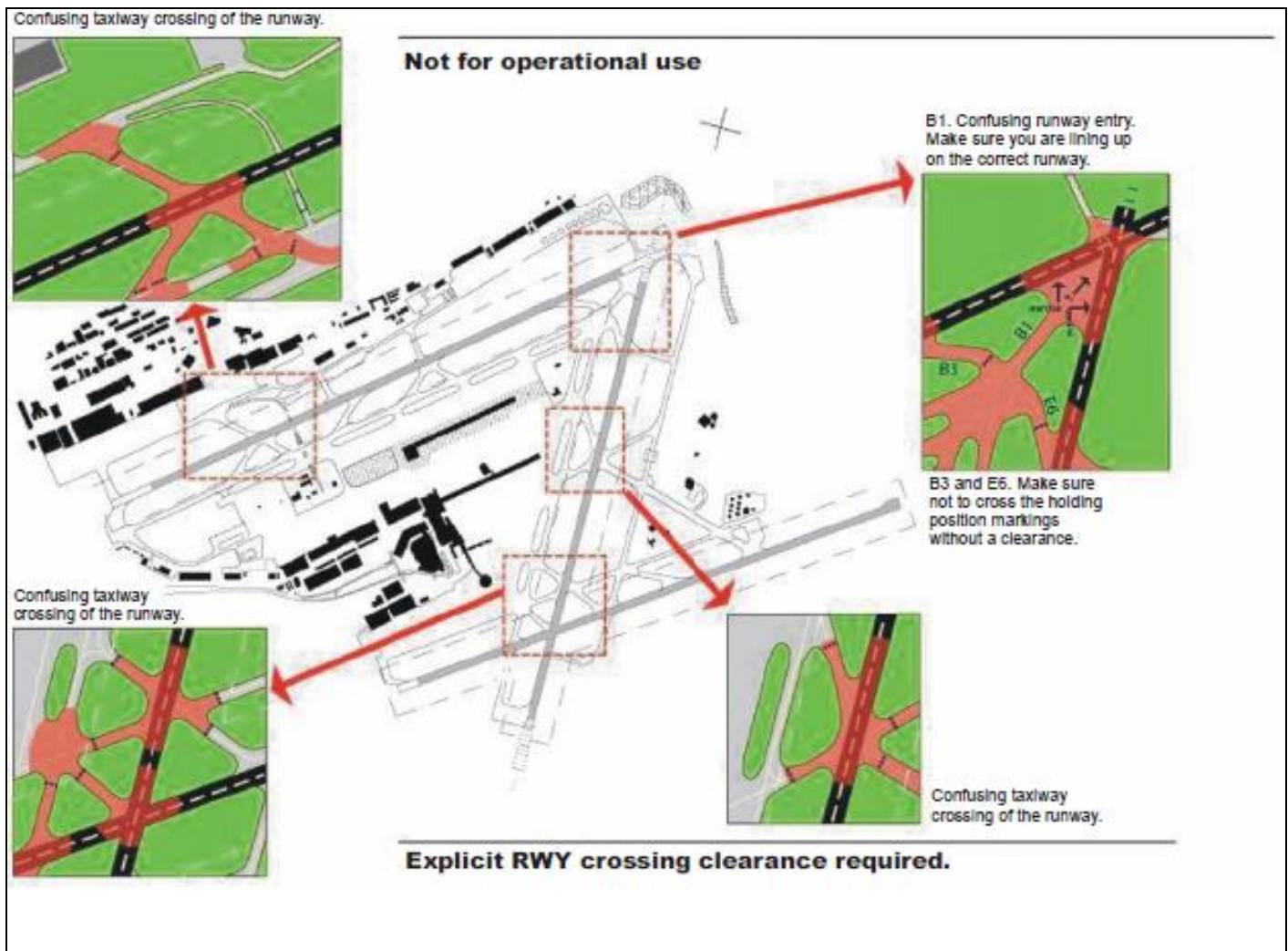


Figure 3

AMC1 ADR.OR.D.030 Safety reporting system

SAFETY REPORTING SYSTEM

(a) Safety reporting system – General

- (1) An effective safety reporting system should include, apart from aerodrome operator's personnel, aircraft operators, ground handling service providers, air navigation service providers, and any other organisation operating on the aerodrome, or providing services at the aerodrome.
- (2) The safety reporting system should include voluntary reporting possibilities intended for safety hazards identified by the reporter, and that may have potential safety consequences.
- (3) The aerodrome operator should identify which events are mandatory to be reported.
- (4) The aerodrome operator should provide the means and the format for reporting which should be such that meets the existing reporting requirements foreseen in the applicable legislation in terms of time, format, and required information to be reported.
- (5) The safety reporting system should include an acknowledgement to the reporter for the submission of the report.
- (6) The reporting process should be as simple as possible, and well documented, including details as to what, how, where, whom, and when to report;
- (7) Regardless of the source or method of submission, once the information is received, it should be stored in a manner suitable for easy retrieval and analysis;
- (8) Access to the submitted reports should be restricted to persons responsible for storing and analysing them;
- (9) Protection of the identity of the reporter should be ensured, and the procedures established by the aerodrome operator to gather additional information for analyses, or investigations should respect this principle;
- (10) The safety reporting system should include a feedback system to the reporting person, on the outcome of the occurrence analysis.

(b) Wildlife hazard reporting

- (1) The aerodrome operator should ensure that its safety reporting system specifically addresses the requirement for all third parties (aircraft operators, aircraft mechanics, air traffic controllers, and other Air Traffic Services personnel, etc.) and all aerodrome personnel, to report to the aerodrome operator related to wildlife strikes, and relevant identified hazards.
- (2) The reporting of such third parties should be done irrespectively of any other requirements according to which they have to report to the Competent Authority of the aerodrome, or the state of registry of the aircraft involved, or any other Competent Authority in the context of the national occurrence reporting programme.

GM1 ADR.OR.D.030(a);(c);(d) Safety reporting system

NEED FOR SAFETYREPORTING

- (a) The overall purpose of the safety reporting system is to use reported information to improve the level of safety performance of the aerodrome, and not to attribute blame.
- (b) The objectives of the safety reporting system should be:
 - (1) to enable an assessment to be made of the safety implications of each relevant occurrence, serious incident and accident, including previous similar events, so that any necessary action can be initiated; and
 - (2) to ensure that knowledge of relevant occurrences, serious incidents and accidents is disseminated, so that other persons and organisations may learn from them.

AMC1 ADR.OR.D.035 Record keeping

DOCUMENTATION TO BE RETAINED

- (a) The system employed by the aerodrome operator for record keeping should provide for adequate procedures, storage facilities, and reliable traceability of the records related to the activities of the aerodrome operator that are subject to the Basic Regulation and its Implementing Rules.
- (b) Records should be kept in paper form, or in electronic format, or a combination of both. Records stored on microfilm or optical disc format are also acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record has been created or last amended.
- (c) Paper systems should use robust material which can withstand normal handling and filing.
- (d) Computer systems should have at least one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against the ability of unauthorised personnel to alter the data.
- (e) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data, and in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken that all necessary data continues to be accessible, at least, through the full retention period. In the absence of any indication, all records should be kept for a minimum period of five years.

AMC2 ADR.OR.D.035 Record keeping

RECORDING OF AIRCRAFT MOVEMENTS

- (a) The aerodrome operator should employ a system to be used for recording the aircraft movements at the aerodrome.
- (b) Such a system should allow the aerodrome operator to record:
 - (1) the number of movements of each aircraft type using the aerodrome;
 - (2) the type of each aircraft movement (commercial air transportation, cargo, etc.);
 - (3) the date of each movement; and
 - (4) the number of passengers.

- (c) The system used should also satisfy the provisions of AMC1 ADR.OR.D.035.

GM1 ADR.OR.D.035 Record keeping

GENERAL

Microfilming or optical storage of records may be carried out at any time. The records should be as legible as the original record, and remain so for the required retention period.

SUBPART E – AERODROME MANUAL (ADR.OR.E)

AMC1 ADR.OR.E.005 Aerodrome manual

GENERAL

- (a) The aerodrome manual may vary in detail according to the complexity of the operation, and of the type of the aerodrome.
- (b) The aerodrome manual or parts of it may be presented in any form, including electronic form. In all cases, the accessibility, usability, and reliability should be assured.
- (c) The aerodrome manual should be such that:
 - (1) all parts of the manual are consistent and compatible in form and content;
 - (2) the manual can be readily amended; and
 - (3) the content and amendment status of the manual is controlled and clearly indicated.
- (d) The aerodrome manual should include a description of its amendment and revision process specifying:
 - (1) the person(s) who may approve amendments or revisions;
 - (2) the conditions for temporary revisions and/or immediate amendments, or revision required in the interest of safety; and
 - (3) the methods by which all personnel and organisations are advised of changes to the aerodrome manual.
- (e) The aerodrome manual may contain parts of, or refer to other controlled documents, such as aerodrome equipment manual, which are available at the aerodrome for use by the personnel.

AMC2 ADR.OR.E.005(i)(2) Aerodrome manual

LANGUAGE OF THE AERODROME MANUAL

A translated version of the relevant parts of the aerodrome manual is an acceptable means to comply with the relevant requirement. In any case, the persons who are going to use the manual should be able to read and understand it.

AMC3 ADR.OR.E.005 Aerodrome manual

AERODROME MANUAL

- (a) The aerodrome manual should have the following structure, and include, at least, the following information; if an item is not applicable, the indication 'Not applicable' or 'Intentionally blank' should be inserted, along with the relevant reason:

A. PART A – GENERAL

- 0. Administration and control of the aerodrome manual including the following:

- 0.1. Introduction:

- 0.1.1 a statement signed by the accountable manager that the aerodrome manual complies with all applicable requirements, and with the terms of the certificate;

- 0.1.2 a statement signed by the accountable manager that the aerodrome manual contains operational instructions that are to be complied with by the relevant personnel;
- 0.1.3 a list and brief description of the various parts, their contents, applicability, and use;
- 0.1.4 explanations, abbreviations, and definitions of terms needed for the use of the manual;
- 0.2 System of amendment and revision:
 - 0.2.1 details of the person(s) responsible for the issuance and insertion of amendments and revisions;
 - 0.2.2 a record of amendments and revisions with insertion dates, and effective dates;
 - 0.2.3 a statement that handwritten amendments and revisions are not permitted, except in situations requiring immediate amendment, or revision in the interest of safety;
 - 0.2.4 a description of the system for the annotation of pages, or paragraphs and their effective dates;
 - 0.2.5 a list of effective pages or paragraphs;
 - 0.2.6 annotation of changes (in the text and, as far as practicable, on charts and diagrams);
 - 0.2.7 temporary revisions; and
 - 0.2.8 description of the distribution system and a distribution list for the aerodrome manual, its amendments, and revisions.

1. General information

General information including the following:

- 1.1 purpose and scope of the aerodrome manual;
- 1.2 legal requirements for an aerodrome certificate and the aerodrome manual as prescribed in Part-ADR.OR;
- 1.3 conditions for use of the aerodrome by its users;
- 1.4 the obligations of the aerodrome operator; rights of the Competent Authority and guidance to staff on how to facilitate audits/inspections by Competent Authority personnel.

B. PART B — AERODROME MANAGEMENT SYSTEM, QUALIFICATION AND TRAINING REQUIREMENTS;

2. A description of the management system, including the following:

- 2.1 Aerodrome organisation and responsibilities including the following: a description of the organisational structure, including the general organogram and other departments' organograms. The organogram should depict the relationship between the departments. Subordination and reporting lines of all levels of organisational structure (Departments, Sections, etc.) related to safety should be shown.

Names, authorities, responsibilities, and duties of management and nominated persons; responsibilities and duties of other operational, maintenance personnel should also be included.

- 2.2. A description of the safety management system, including:
 - 2.2.1 scope of the safety management system;
 - 2.2.2 safety policy and objectives;
 - 2.2.3 safety responsibilities of key safety personnel;
 - 2.2.4 documentation control procedures;
 - 2.2.5 safety risk management process, including hazard identification and risk assessment schemes;
 - 2.2.6 monitoring of implementation and effectiveness of safety actions, and risk mitigation measures;
 - 2.2.7 safety performance monitoring;
 - 2.2.8 safety reporting (including hazard reporting) and investigation;
 - 2.2.9 emergency response planning;
 - 2.2.10 management of change (including organisational changes with regard to safety responsibilities);
 - 2.2.11 safety promotion; and
 - 2.2.12 safety management system outputs.
- 2.3 A description of the compliance monitoring and related procedures.
- 2.4 A description of the quality management system for aeronautical data and aeronautical information provision activities and related procedures, including those for meeting the relevant safety, and security management objectives.
- 2.5 Procedures for reporting to the Competent Authority including handling, notifying and reporting accidents, serious incidents, and occurrences. This section should include, at least, the following:
 - (a) definition of accident, serious incident and occurrence and of the relevant responsibilities of all persons involved;
 - (b) illustrations of forms to be used (or copies of the forms themselves), instructions on how they are to be completed, the addresses to which they should be sent and the time allowed for this to be done;
 - (c) procedures and arrangements for the preservation of evidence, including recordings, following a reportable event;
- 2.6 Policy and procedures related to the use of alcohol, psychoactive substances and medicines.
- 2.7 Procedures for:
 - 2.7.1 complying with safety directives;
 - 2.7.2 reaction to safety problems; and
 - 2.7.3 handling of safety recommendations issued by Safety Investigation Authorities.
- 2.8 A description of the method for recording aircraft movements, including movement and aircraft type, dates, and number of passengers.

3. Required aerodrome personnel qualifications. Moreover, procedures related to:
 - 3.1 the training programme, including the following:
 - 3.1.1 responsibilities, frequencies, syllabi, and the identified training standards for all personnel involved in the operation, rescue and firefighting maintenance and management of the aerodrome, and those persons operating unescorted on the movement area and other operational areas of the aerodrome.
 - 3.1.2 procedures:
 - 3.1.2.1 for training and checking of the trainees;
 - 3.1.2.2 to be applied in the event that personnel do not achieve the required standards.
 - 3.1.3 description of documentation to be stored and storage periods.
 - 3.2 the proficiency check programme, including responsibilities and frequencies;
 - 3.2.1 procedures to be applied in the event that personnel do not achieve the required standards.
 - 3.2.3 description of documentation to be stored and storage periods.
- C. PART C — PARTICULARS OF THE AERODROME SITE
4. A description of the aerodrome site including in particular, the following information:
 - 4.1 a plan showing the distance of the aerodrome from the nearest city, town, or other populous area;
 - 4.2 detailed maps and charts of the aerodrome showing the aerodrome's location (longitude and latitude) and boundaries, major facilities, aerodrome reference point, layout of runways, taxiways and aprons, aerodrome visual and non-visual aids, and wind direction indicators;
 - 4.3 a plan showing the location of any aerodrome facilities and equipment outside the boundaries of the aerodrome;
 - 4.4 description of the physical characteristics of the aerodrome, elevations, visual and non-visual aids, as well as the information regarding the aerodrome reference temperature, strength of pavements, rescue and firefighting level of protection, ground aids and main obstacles;
 - 4.5 description of any cases of exemptions or derogations, equivalent level of safety, special conditions, and operating limitations; and
 - 4.6 description of the types of operations that the aerodrome is approved to conduct.
- D. PART D — PARTICULARS OF THE AERODROME REQUIRED TO BE REPORTED TO THE AERONAUTICAL INFORMATION SERVICE
5. The aeronautical information services available and the procedures for the promulgation of general information, including the following:
 - 5.1 the name of the aerodrome;

- 5.2 the location of the aerodrome;
 - 5.3 the geographical coordinates of the aerodrome reference point determined in terms of the World Geodetic System – 1984 (WGS-84) reference datum;
 - 5.4 the aerodrome elevation and geoid undulation;
 - 5.5 the elevation of each threshold and geoid undulation, the elevation of the runway end, and any significant high and low points along the runway, and the highest elevation of the touchdown zone of a precision approach runway;
 - 5.6 the aerodrome reference temperature;
 - 5.7 details of the aerodrome beacon; and
 - 5.8 the name of the aerodrome operator and contact details (including telephone numbers) of the aerodrome operator at which may be contacted at all times.
6. Aerodrome dimensions and related information, including the following:
- 6.1 runway – true bearing, designation number, length, width, displaced threshold location, slope, surface type, type of runway and, for a precision approach runway, the existence of an obstacle free zone;
 - 6.2 length, width and surface type of strip, runway end safety areas, stopways; length, width and surface type of taxiways; apron surface type and aircraft stands; clearway length and ground profile;
 - 6.3 visual aids for approach procedures, approach lighting type and visual approach slope indicator system; marking and lighting of runways, taxiways, and aprons; other visual guidance and control aids on taxiways and aprons, location and type of visual docking guidance system; availability of standby power for lighting;
 - 6.4 the location and radio frequency of VOR aerodrome checkpoints;
 - 6.5 the location and designation of standard taxi routes;
 - 6.6 the geographical coordinates of each threshold, appropriate taxiway centre line points, and aircraft stands;
 - 6.7 the geographical coordinates, and the top elevation of significant obstacles in the approach and take-off areas, in the circling area and in the surroundings of the aerodrome (in the form of charts);
 - 6.8 pavement surface type and bearing strength using the Aircraft Classification Number – Pavement Classification Number (ACN-PCN) method;
 - 6.9 pre-flight altimeter check locations established and their elevation;
 - 6.10 declared distances;
 - 6.11 contact details (telephone/telex/fax numbers and e-mail address) of the aerodrome coordinator for the removal of disabled aircraft, and information on the capability to remove disabled aircraft, expressed in terms of the largest aircraft type;
 - 6.12 rescue and firefighting level of protection; types and amounts of extinguishing agents normally available at the aerodrome; and
 - 6.13 exemptions or derogations from the applicable requirements, cases of equivalent level of safety, special conditions, and limitations.

E. PART E — PARTICULARS OF OPERATING PROCEDURES OF THE AERODROME, ITS EQUIPMENT, AND SAFETY MEASURES

7. Aerodrome reporting, including:
 - 7.1 arrangements and procedures for reporting changes to the aerodrome information set out in the AIP and requesting the issue of NOTAM, including reporting changes to the Competent Authority and recording of the reporting of changes;
8. Procedures for accessing the aerodrome movement area, including:
 - 8.1 coordination with the security agencies;
 - 8.2 prevention of unauthorised entry into the movement area;
9. Procedures and responsible personnel for the inspection, assessment and reporting of the condition of the aerodrome movement area and other operational areas and facilities, (including runway surface friction characteristics assessments and water-depth measurements), including:
 - 9.1 arrangements and means of communicating with the air traffic services unit during inspections;
 - 9.2 inspection checklists, logbook, and record-keeping; and
 - 9.3 inspection intervals and times; reporting results and follow-up actions.
10. Procedures for the inspection, and routine and emergency maintenance of visual and non-visual aids, as appropriate, and the aerodrome electrical systems, including:
 - 10.1 inspection checklists, logbook, and record keeping; and
 - 10.2 inspection intervals and times; reporting results and follow-up actions.
11. Operating, maintenance and repair instructions, servicing information, troubleshooting and inspection procedures of aerodrome equipment.
12. Procedures for maintenance of the movement area, including paved areas; unpaved runways and taxiways; runways and runway strips and aerodrome drainage.
13. Procedures for aerodrome works, including:
 - 13.1 coordinating, planning, and carrying out construction and maintenance work; and
 - 13.2 arrangements and means of communicating with air traffic services unit during the progress of such work.
14. Procedures for apron management, including:
 - 14.1 transfer of the aircraft between air traffic services unit, and the apron management unit;
 - 14.2 allocation of aircraft parking positions;
 - 14.3 engine start and aircraft push-back; and
 - 14.4 marshalling and 'follow-me' service.
15. Procedures for apron safety management, including:
 - 15.1 protection from jet blasts;
 - 15.2 enforcement of safety precautions during aircraft refuelling operations;
 - 15.3 apron cleaning/sweeping; and
 - 15.4 monitoring compliance of personnel on the apron with safety procedures.

16. Procedures for the control of vehicles operating on or in the vicinity, or the movement area, including traffic rules, speed limits, and method for issuing driving permits, and enforcement means.
17. Procedures for wildlife hazard management, including assessing wildlife hazards and arrangements for implementation of the wildlife control programme, and promulgation of the relevant information to the AIS; wildlife strike form.
18. Procedures for obstacle control and monitoring within and outside of the aerodrome boundaries, and notification to the Competent Authority, of the nature and location of obstacles, and any subsequent addition, or removal of obstacles for action as necessary, including amendment of the AIS publications; inspection checklists, logbook, and record keeping; inspection intervals and times; reporting results and follow-up actions.
19. Aerodrome emergency plan including:
 - 19.1 dealing with emergencies at the aerodrome or in its surroundings;
 - 19.2 tests for aerodrome facilities and equipment to be used in emergencies, including their frequency; and
 - 19.3 exercises to test emergency plans, including their frequency.
20. Rescue and firefighting, including description of facilities, equipment, personnel and procedures for meeting the firefighting requirements.
21. Removal plan of disabled aircraft, including relevant arrangements, equipment, and procedures for its implementation.
22. Procedures for ensuring the safe handling and storage of fuel and dangerous goods in the aerodrome, including:
 - 22.1 equipment, storage areas, delivery, dispensing, handling, and safety measures;
 - 22.2 quality and correct specification of aviation fuel; audit and inspection intervals, checklists, sampling and record keeping.
23. Low visibility operations: description of operational procedures, including coordination with air traffic services unit and apron management unit, standard taxiing routes, control of activities, and measurement and reporting of runway visual range.
24. Procedures for winter operations.
25. Snow removal plan and procedures for its implementation, including a description of the available means and relevant arrangements.
26. Procedures for operations in adverse weather conditions.
27. Procedures for night operations.
28. Procedures for the protection of radar and other navigational aids, control of activities, and ground maintenance in the vicinity of these installations.
29. Procedures and measures for the prevention of fire at the aerodrome.
- (b) All procedures contained in the aerodrome manual should include and clearly define the roles, responsibilities, and contact details of responsible aerodrome personnel, other persons or organisations, including the Competent Authority and other state agencies involved, as appropriate, and take into account the need for establishing direct communication during non-working hours.

GM1 ADR.OR.E.005 Aerodrome manual

AERODROME MANUAL

(a) Form of the aerodrome manual

The aerodrome manual is a key document both for the aerodrome operator and the Competent Authority. The manual is the source document describing how the aerodrome infrastructure, facilities, and operational procedures will operate safely.

As well as the operational procedures, the Competent Authority will expect the aerodrome manual to be an accurate reflection of the day-to-day functioning of the aerodrome's safety management system, and its safety culture. It will need to show how the aerodrome intends to measure its performance against safety targets and objectives. The reader of an aerodrome manual should be given a clear statement of how safety is developed, managed, and maintained on the aerodrome. All safety policies, operational procedures and instructions should be contained in detail when relevant or cross-referenced to other controlled, formally accepted or recognised, publications.

At larger aerodromes, the size and complexity of operations, and related procedures may dictate that these procedures could not easily be included in a single document. In such circumstances, it is acceptable to identify and reference within the aerodrome manual the procedures which are not included within it. If this system is to be successful, it is essential that any referenced information, documentation, and procedures are made available as necessary to all operational staff in a similar way as the aerodrome manual itself. For that purpose, a computerised database containing the referenced procedures and information could be suitable. For many small aerodromes, the aerodrome manual can be both simple and brief as long as it covers procedures essential for satisfactory day-to-day operations. Nevertheless, it is possible to adopt a common format embracing the essential elements that define a safety management system.

(b) Purpose of the aerodrome manual

An efficient management structure and a systematic approach to aerodrome operation is essential. The aerodrome manual should contain all the relevant information to describe this structure satisfactorily. It is one of the means by which all relevant operating staff can be informed as to their duties and responsibilities with regard to safety. It should describe the aerodrome infrastructure, services and facilities, all operating procedures, and any restrictions on aerodrome availability.

Accountability for safety must start at the very top of any organisation. One of the key elements in establishing safe working practices is the 'top down' approach where all staff should understand the safety aims of the organisation, the chain of command, and their own responsibilities and accountabilities. As safety management principles are applied, the aerodrome manual should be expanded to describe clearly how the safety of operations is to be managed. To a reader or user of the aerodrome manual, there should never be any doubt in terms of 'safety accountability' for each domain or activity described. Each section should define who is accountable, who is responsible, who has the authority, who has the expertise, and who actually carries out the tasks described in any section.

The principle objective of an aerodrome manual should be to show how management will accomplish its safety responsibilities. The aerodrome manual will set out the policy and expected standards of performance, and the procedures by which they will be achieved.

The aerodrome operator should ensure that:

- (1) the responsibilities of the aerodrome operator are clearly described;

- (2) the tasks and activities that are to be performed by the aerodrome operator or its subcontractors are listed; and
- (3) the means and procedures in order to complete these tasks and activities are described or appended, together with the necessary details on their frequencies and operating modes.

Where responsibilities are attributed to other stakeholders, the aerodrome manual should clearly identify them.

GM2 ADR.OR.E.005 Aerodrome manual

CONTENTS

The numbering system described in AMC3 ADR.OR.E.005 should be maintained even if there are sections that, because of the nature of the aerodrome or the types of operation, are not applicable.

GM1 ADR.OR.E.005 (j) Aerodrome manual

HUMAN FACTORS PRINCIPLES

Guidance material on the application of human factors principles may be found in the ICAO Human Factors Training Manual (Doc 9683).

AMC/GM to ANNEX III – Part Operations Requirements (Part-OPS)

SUBPART A – AERODROME DATA (ADR.OPS.A)

AMC1 ADR.OPS.A.005 Aerodrome Data

- (a) Data relevant to the aerodrome and available services should include, but may not be limited to, items in the following list:
 - (1) aerodrome reference point;
 - (2) aerodrome and runway elevations;
 - (3) aerodrome reference temperature;
 - (4) aerodrome dimensions and related information;
 - (5) strength of pavements;
 - (6) pre-flight altimeter check location;
 - (7) declared distances;
 - (8) condition of the movement area and related facilities;
 - (9) disabled aircraft removal;
 - (10) rescue and firefighting; and
 - (11) visual approach slope indicator systems.
- (b) The aerodrome operator should measure and report to the aeronautical information services obstacles and terrain data in Area 3, and in Area 2 (the part within the aerodrome boundary) in degrees, minutes, seconds and tenths of seconds. In addition, the top elevation, type, marking and lighting (if any) of obstacles should be reported to the aeronautical information services.
- (c) Electronic obstacle data for all obstacles in Area 2 (the part within the aerodrome boundary) that are assessed as being a hazard to air navigation should be provided.
- (d) Electronic terrain and obstacle data should be provided for:
 - (1) Area 2a, for those that penetrate the relevant obstacle data collection surface;
 - (2) penetrations of the take-off flight path area obstacle identification surfaces; and
 - (3) penetrations of the aerodrome obstacle limitation surfaces.
- (e) Electronic terrain and obstacle data should be provided for Area 4 for terrain and obstacles that penetrate the relevant obstacle data collection surface, for all runways where precision approach Category II or III operations have been established and where detailed terrain information is required by operators to enable them to assess the effect of terrain on decision height determination by use of radio altimeters.
- (f) The aerodrome operator should establish arrangements with the Air Traffic Services providers and the Competent Authority for the provision of obstacles and terrain data outside of the aerodrome boundary.

GM1 ADR.OPS.A.005 Aerodrome data

AERODROME REFERENCE POINT

- (a) The aerodrome reference point should be located near the initial or planned geometric centre of the aerodrome and normally should remain where first established.
- (b) The aerodrome reference point should be reported to the aeronautical information services in degrees, minutes, and seconds.

AERODROME AND RUNWAY ELEVATIONS

The following should be measured and reported to the aeronautical information services:

- (a) The aerodrome elevation and geoid undulation at the aerodrome elevation position to the accuracy of one-half metre or foot;
- (b) For non-precision approaches, the elevation and geoid undulation of each threshold, the elevation of the runway end and any significant high and low points along the runway, to the accuracy of one-half metre or foot;
- (c) For precision approach runway, the elevation and geoid undulation of the threshold, the elevation of the runway end and the highest elevation of the touchdown zone, to the accuracy of one-quarter metre or foot.

AERODROME REFERENCE TEMPERATURE

- (a) The aerodrome reference temperature should be determined in degrees Celsius.
- (b) The aerodrome reference temperature should be the monthly mean of the daily maximum temperatures for the hottest month of the year (the hottest month being that which has the highest monthly mean temperature), averaged over a period of five (5) years.

AERODROME DIMENSIONS AND RELATED INFORMATION

The following data are measured or described, as appropriate, for each facility provided on the aerodrome:

- (a) Runway
 - (1) true bearing to one-hundredth of a degree;
 - (2) designation number;
 - (3) length;
 - (4) width;
 - (5) displaced threshold location to the nearest metre or foot;
 - (6) longitudinal slope;
 - (7) surface type;
 - (8) type of runway; and
 - (9) for a precision approach runway category I, the existence of an obstacle free zone when provided.
- (b) Strip/Runway End Safety Area/Stopway

AMC/GM to Annex III – Part-OPS

SUBPART A – AERODROME DATA (ADR.OPS.A)

- (1) Length, width to the nearest metre or foot; and
- (2) Surface type.
- (c) Taxiway
 - (1) Designation;
 - (2) Width; and
 - (3) Surface type.
- (d) Apron
 - (1) Surface type; and
 - (2) Aircraft stands.
- (e) The boundaries of the air traffic control service;
- (f) Clearway
 - (1) length to the nearest metre or foot; and
 - (2) ground profile.
- (g) Visual aids for approach procedures, marking and lighting of runways, taxiways and aprons, other visual guidance and control aids on taxiways and aprons, including runway holding positions, intermediate holding positions and stopbars, and location and type of visual docking guidance systems;
- (h) Location and radio frequency of any VOR aerodrome checkpoint;
- (i) Location and designation of standard taxi-routes;
- (j) Distances to the nearest metre or foot of localiser and glide path elements comprising an instrument landing system (ILS) or azimuth and elevation antenna of a microwave landing system (MLS) in relation to the associated runway extremities;
- (k) The geographical coordinates of:
 - (1) each threshold;
 - (2) appropriate taxiway centre line points; and
 - (3) each aircraft stand;

are measured and reported to the aeronautical information services in degrees, minutes, seconds and hundredths of seconds.

STRENGTH OF PAVEMENTS

- (a) The bearing strength of a pavement intended for aircraft of apron (ramp) mass greater than 5 700 kg should be made available using the aircraft classification – pavement classification number (ACN-PCN) method, by reporting all of the following information:
 - (1) the pavement classification number (PCN);
 - (2) pavement type for ACN-PCN determination;
 - (3) subgrade strength category;
 - (4) maximum allowable tire pressure category or maximum allowable tire pressure value; and
 - (5) evaluation method.

AMC/GM to Annex III – Part-OPS

SUBPART A – AERODROME DATA (ADR.OPS.A)

- (b) For the purposes of determining the ACN, the behaviour of a pavement should be classified as equivalent to a rigid or flexible construction;
- (c) Information on pavement type for ACN-PCN determination, subgrade strength category, maximum allowable tire pressure category and evaluation method, should be reported using the following codes:
- (1) Pavement type for ACN-PCN determination:
 - (i) Rigid pavement: Code R;
 - (ii) Flexible pavement: Code F;
 - (2) Subgrade strength category:
 - (i) High strength: characterised by $K = 150 \text{ MN/m}^3$ and representing all K values above 120 MN/m^3 for rigid pavements, and by $\text{CBR} = 15$ and representing all CBR values above 13 for flexible pavements – Code A;
 - (ii) Medium strength: characterised by $K = 80 \text{ MN/m}^3$ and representing a range in K of 60 to 120 MN/m^3 for rigid pavements, and by $\text{CBR} = 10$ and representing a range in CBR of 8 to 13 for flexible pavements – Code B;
 - (iii) Low strength: characterised by $K = 40 \text{ MN/m}^3$ and representing a range in K of 25 to 60 MN/m^3 for rigid pavements, and by $\text{CBR} = 6$ and representing a range in CBR of 4 to 8 for flexible pavements – Code C;
 - (iv) Ultra low strength: characterised by $K = 20 \text{ MN/m}^3$ and representing all K values below 25 MN/m^3 for rigid pavements, and by $\text{CBR} = 3$ and representing all CBR values below 4 for flexible pavements – Code D;
 - (3) Maximum allowable tire pressure category:
 - (i) High: no pressure limit – Code W;
 - (ii) Medium: pressure limited to 1.50 MPa – Code X;
 - (iii) Low: pressure limited to 1.00 MPa – Code Y;
 - (iv) Very low: pressure limited to 0.50 MPa – Code Z;
 - (4) Evaluation method:
 - (i) Technical evaluation: representing a specific study of the pavement characteristics and application of pavement behaviour technology – Code T;
 - (ii) Using aircraft experience: representing a knowledge of the specific type and mass of aircraft satisfactorily being supported under regular use – Code U;
- (d) The bearing strength of a pavement intended for aircraft of apron (ramp) mass equal to or less than 5 700 kg, should be reported by reporting the following information:
- (1) maximum allowable aircraft mass; and
 - (2) maximum allowable tire pressure.

PRE-FLIGHT ALTIMETER CHECK LOCATION

- (a) One or more pre-flight altimeter check locations should be established.
- (b) The elevation of a pre-flight altimeter check location should be given as the average elevation, rounded to the nearest metre or foot, of the area on which it is located. The elevation of any portion of a pre-flight altimeter check location should be within 3 m (10 ft) of the average elevation for that location.
- (c) Pre-flight check location could be located on an apron. Locating a pre-flight altimeter check location on an apron enables an altimeter check to be made prior to obtaining taxi clearance and eliminates the need for stopping for that purpose after leaving the apron. Normally an entire apron could serve as a satisfactory altimeter check location.

DECLARED DISTANCES

- (a) The following distances should be calculated to the nearest metre or foot for a runway and reported to the aeronautical information services and Air Traffic Services:
 - (1) Take-off run available (TORA);
 - (2) Take-off distance available (TODA);
 - (3) Accelerate stop distance available (ASDA); and
 - (4) Landing distance available (LDA).
- (b) The take-off run available (TORA), take-off distance available (TODA), accelerate stop distance available (ASDA) and landing distance available (LDA) should be calculated according to the following (all declared distances are illustrated for operations from left to right):
 - (1) Where a runway is not provided with a stopway or a clearway and the threshold is located at the extremity of the runway, the four declared distances should normally be equal to the length of the runway

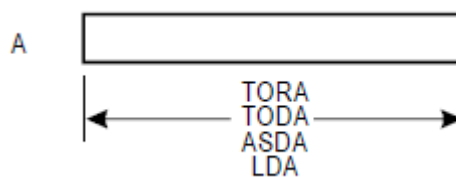


Figure 1

- (2) When a runway is provided with a clearway (CWY), then the TODA will include the length of clearway.

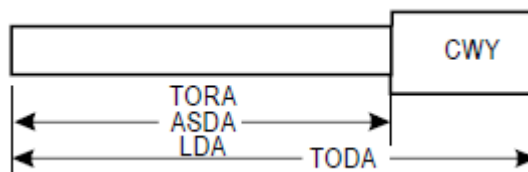


Figure 2

- (3) Where a runway is provided with a stopway (SWY), then the ASDA will include the length of stopway.

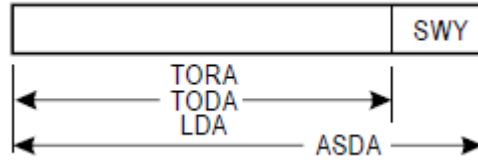


Figure 3

- (4) Where a runway has a displaced threshold, then the LDA will be reduced by the distance the threshold is displaced. A displaced threshold affects only the LDA for approaches made to that threshold; all declared distances for operations in the reciprocal direction are unaffected.

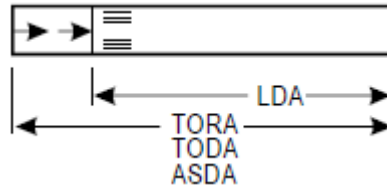


Figure 4

- (5) Where a runway is provided with more than one of the clearway, stopway, or having a displaced threshold, then more than one of the declared distances will be modified. The modification will follow the same principle as in (1)–(4)

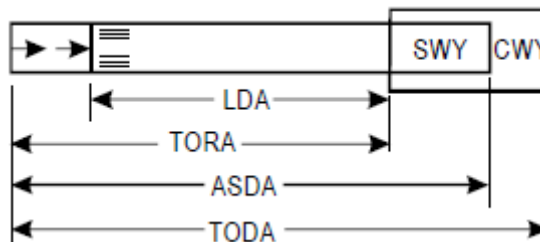


Figure 5

(c) The information on declared distances should be provided according to the following table:

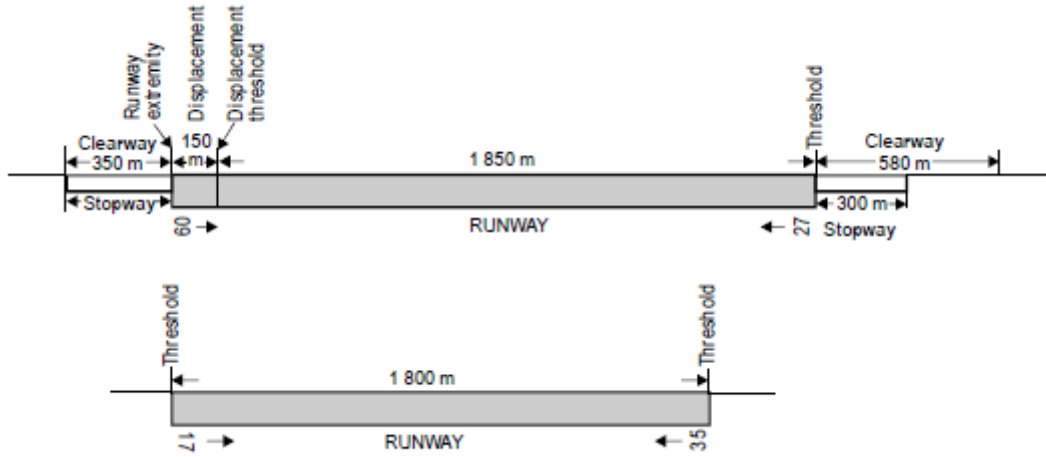


Figure 6

RUNWAY	TORA	ASDA	TODA	LDA
	m	m	m	m
09	2 000	2 300	2 580	1 850
27	2 000	2 350	2 350	2 000
17	NU	NU	NU	1 800
35	1 800	1 800	1 800	NU

Table 1

If a runway direction cannot be used for take-off or landing, or both because it is operationally forbidden, then this should be declared and the words 'not usable' or the abbreviation 'NU' entered.

(d) When intersection take-offs are performed, the datum line from which the reduced runway declared distances for take-off are determined, should be defined by the intersection of the downwind edge as shown in the figure below:

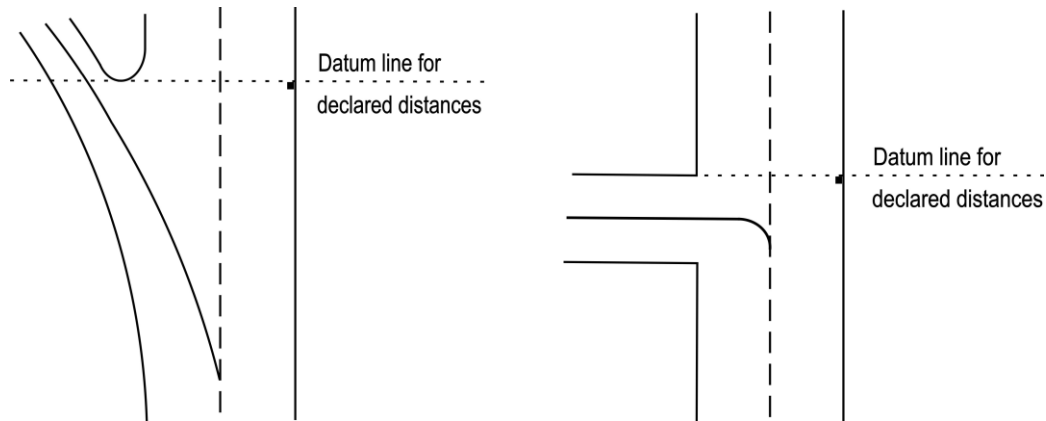


Figure 7

CONDITION OF THE MOVEMENT AREA AND RELATED FACILITIES

The condition of the movement area and the operational status of related facilities should be monitored and reported, on matters of operational significance or affecting aircraft performance, particularly in respect of the following:

- (a) construction or maintenance work;
- (b) rough or broken surfaces on a runway, a taxiway or an apron;
- (c) snow, slush, or ice on a runway, a taxiway or an apron;
- (d) water on a runway, a taxiway or an apron;
- (e) snow banks or drifts adjacent to a runway, a taxiway or an apron;
- (f) anti-icing or de-icing liquid chemicals on a runway or a taxiway;
- (g) other temporary hazards, including parked aircraft;
- (h) failure or irregular operation of part or all of the aerodrome visual aids; and
- (i) failure of the normal or secondary power supply.

Water on a runway

Whenever water is present on a runway, a description of the runway surface conditions on the centre half of the width of the runway, including the possible assessment of water depth, where applicable, should be made available using the following terms:

- (a) DAMP — the surface shows a change of colour due to moisture;
- (b) WET — the surface is soaked but there is no standing water;
- (c) WATER PATCHES — significant patches of standing water are visible; and
- (d) FLOODED — extensive standing water is visible;

Information that a runway or portion thereof maybe slippery when wet, should be made available to the aerodrome users.

Snow, slush or ice on a runway

- (a) Whenever a runway is affected by snow, slush, or ice, and it has not been possible to clear the precipitant fully, the condition of the runway should be assessed, and the friction coefficient measured. Runway condition assessment and friction coefficient measurement should be repeated as conditions change.
- (b) Friction measurements and/or braking action assessments on surfaces other than runways should be made when an unsatisfactory friction condition can be expected on such surfaces.
- (c) The contaminant type, distribution, and for loose contaminants, depth for each third of the runway, should be assessed.
- (d) Assessment of the friction of a runway should be made in descriptive terms of 'estimated' braking action. The estimated braking action should be categorised as good, medium to good, medium, medium to poor, and poor, and promulgated in SNOWTAM format as well as using appropriate RTF phraseologies.
- (e) The estimated braking action, based on the measured coefficient, when the runway is covered by compacted snow or ice only, should be reported according to the following table (indicative):

Measured Coefficient (μ)	Estimated braking action	Code
0.40 and above	Good	5
0.39 to 0.36	Medium to good	4
0.35 to 0.30	Medium	3
0.29 to 0.26	Medium to poor	2
0.25 and below	Poor	1

Table 2

- (f) Assessed surface condition information, including estimated braking action, should be reported for each third of a runway. The thirds are called A, B and C;
- (1) For the purpose of reporting information to aeronautical service units, Section A should always be the section associated with the lower runway designation number;
 - (2) When giving landing information to a pilot before landing, the sections should be referred to as first, second or third part of the runway. The first part should always mean the first third of the runway as seen in the direction of landing;
 - (3) Assessments should be made along two lines parallel to the runway, i.e. along a line on each side of the centreline approximately 3 m, or that distance from the centreline at which most operations take place.

- (4) In cases where a continuous friction measuring device is used, the mean values are obtained from the friction values recorded for each section;
- (g) Whenever dry snow, wet snow or slush is present on a runway, the mean depth over each third of the runway is assessed to an accuracy of approximately 2 cm for dry snow, 1 cm for wet snow and 0.3 cm for slush.

DISABLED AIRCRAFT REMOVAL

- (a) The contact details (telephone/telex number(s), email address, etc.) of the office of the aerodrome coordinator of operations for the removal of an aircraft disabled on or adjacent to the movement area should be made available on request to aircraft operators.
- (b) Information concerning the capability to remove an aircraft disabled on or adjacent to the movement area should be made available.
- (c) The capability to remove a disabled aircraft may be expressed in terms of the largest type of aircraft which the aerodrome is equipped to remove.

RESCUE AND FIREFIGHTING

- (a) Information concerning the level of protection provided at an aerodrome for aircraft rescue and firefighting purposes during the hours of operation should be made available.
- (b) The level of protection normally available at the aerodrome should be expressed in terms of the category of the rescue and firefighting services and in accordance with the types and amounts of extinguishing agents normally available at the aerodrome.
- (c) Changes in the level of protection normally available at the aerodrome for rescue and firefighting should be notified to the appropriate air traffic services units and aeronautical information services units to enable those units to provide the necessary information to arriving and departing aircraft. When such a change has been corrected, the above units should be advised accordingly.
- (d) Changes in the level of protection from that normally available at the aerodrome could result from a change in the availability of extinguishing agents, equipment to deliver the agents or personnel to operate the equipment, etc.
- (e) A change in the level of protection is expressed in terms of the new category of the rescue and firefighting services available at the aerodrome.

VISUAL APPROACH SLOPE INDICATOR SYSTEMS

The following information concerning a visual approach indicator system is made available:

- (a) associated runway designation number;
- (b) type of system; for a PAPI or APAPI installation, the side of the runway on which the lights are installed, i.e. left or right, is given;
- (c) where the axis of the system is not parallel to the runway centre line, the angle of displacement and the direction of displacement, i.e. left or right, is indicated;

- (d) nominal approach slope angle(s); and
- (e) minimum eye height(s) over the threshold of the on-slope signal(s).

GM2 ADR.OPS.A.005 (a) Aerodrome data

SURVEYING REQUIREMENTS FOR RUNWAY THRESHOLDS, TAXIWAYS AND AIRCRAFT STANDS

(a) Thresholds

- (1) For surveying purposes, threshold positions must be taken as being at the geometric centre of the runway and at the beginning of the paved surface, i.e. the beginning of that portion of the runway usable for landing. Where thresholds are marked by appropriate threshold markings (e.g. displaced thresholds), these must be taken as the threshold points. Where threshold lighting is surveyed, the locations must be described on the diagram accompanying the report. Where there is no threshold lighting, an appropriate point for survey in accordance with the following figures must be selected.

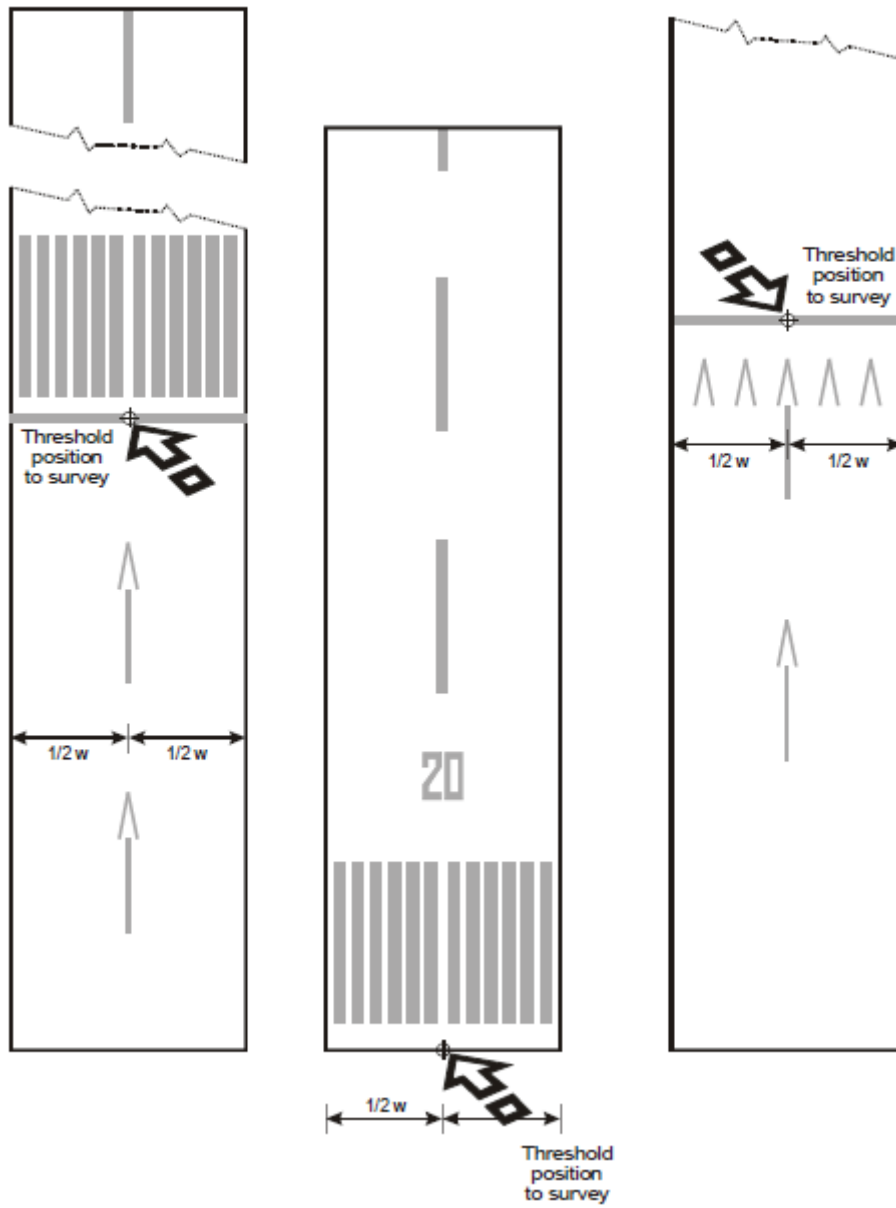


Figure 1

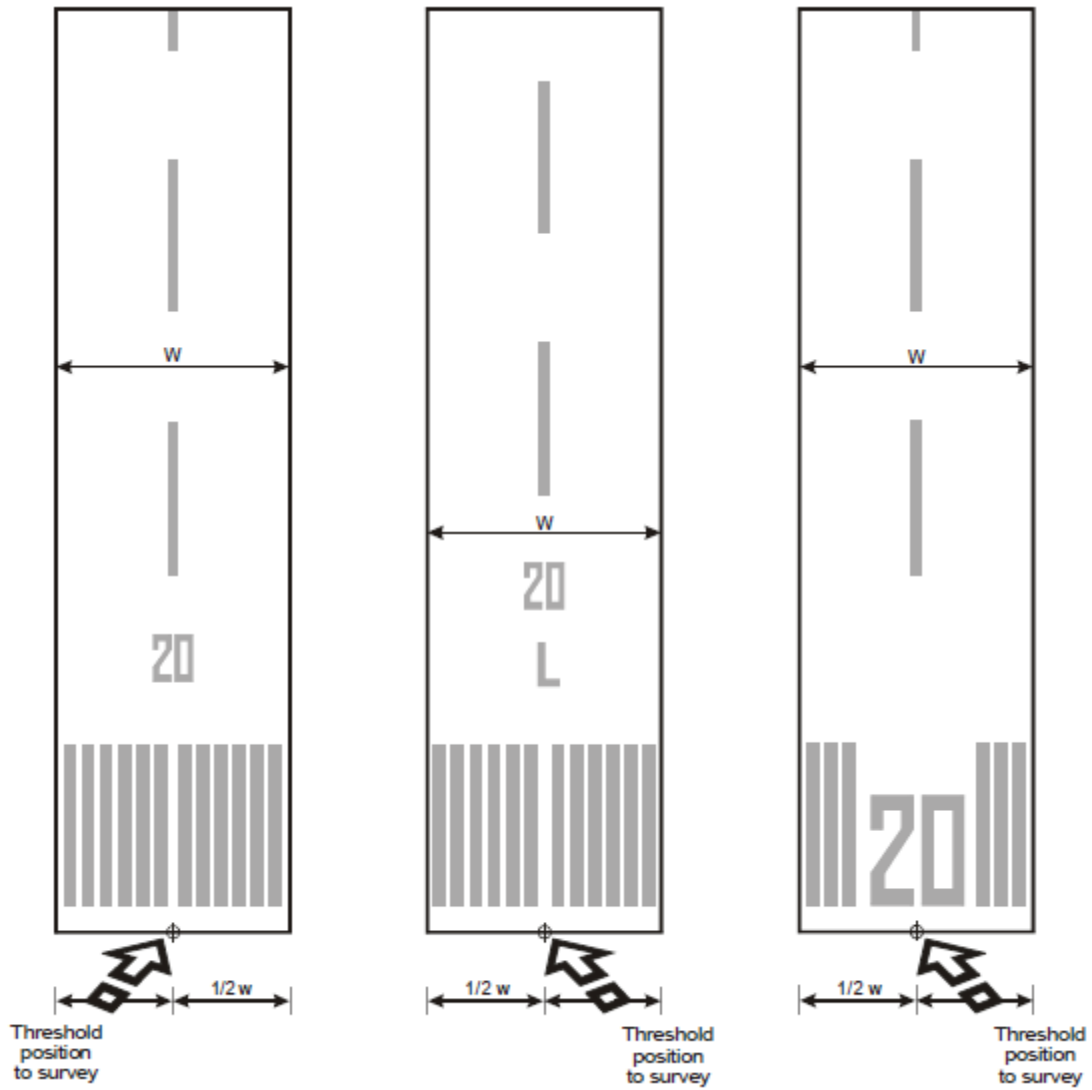


Figure 2

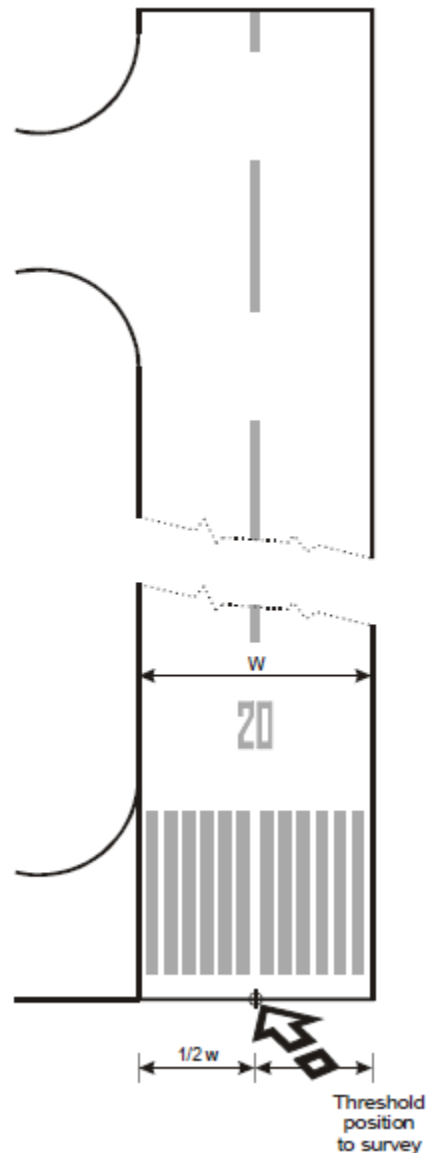


Figure 3

- (2) If the runway has only one threshold certified for landing, the runway end position must be surveyed. For surveying purposes, the runway end position (flight path alignment point) must be taken as being at the geometric centre of the runway and at the end of the paved surface, i.e. the end of that portion of the runway usable for landing.
- (b) Taxiways and stand/checkpoints — General
- (1) Except as provided in (c) (1) below, for surveying purposes the centre (mid-width) of the taxiway centre line marking, apron taxilane marking or the aircraft stand guide line marking must be taken as the reference data.
- (2) The points of commencement and ends of straight sections of taxiways, apron taxilanes and aircraft stand point guidance lines markings must be surveyed. Sufficient additional points must be surveyed to maintain the required accuracy along the lines.

- (3) For curved sections of taxiways, apron taxilanes and aircraft stand guide line markings, the commencement and end of the curved section centre line must be surveyed together with the position of the centre point of the arc and its radius. In the case of a compound curve, the centre and radius of each arc and the commencement and end of each of the arcs must be surveyed. Where this is impracticable in the field, a series of sequential points must be surveyed along the curved section of the centre line with a maximum arc to chord distance not exceeding 0.25 m for taxiways and 0.10 m for apron taxilanes and aircraft stand guide line markings. Sufficient points must be surveyed to maintain the required accuracy along the lines. The surveyor must, in processing the data, conduct a graphical inspection of the survey points to ensure collinearity.

(c) Taxiways

- (1) To permit uninterrupted transition from the actual runway centre line to the taxiway centre line and to provide the required continuity of guidance for the aircraft navigation data base, differentiation must be made between the surface markings and the actual path the aircraft must follow. Therefore, for the guidance of aircraft entering or exiting the runway for take-off or landing, the following must be surveyed:

- (i) the point at which the radius of turn, prescribed by the appropriate authority for each taxiway, is tangential to the runway centre line, and the point at which that radius of turn joins the taxiway centre line marking at a tangent;
- (ii) the point that prescribes the centre of the arc; and
- (iii) the radius of the arc.

Where this is impracticable in the field, a series of sequential points must be surveyed along the curved section of the centre line of taxiways.

- (2) Where taxiway centre line marking is provided on a runway that is part of a standard taxi route, or a taxiway centre line is not coincident with runway centre line, the following points must be surveyed:

- (i) the point on the taxiway marking at which the taxiway enters the runway;
- (ii) the points at which the taxiway deviates from a straight line;
- (iii) the intersection of the taxiway centre line marking and boundary of each 'block' that has been published as part of the airport movement and guidance control system; and
- (iv) the point on the taxiway marking at which the taxiway exits the runway.

- (3) In defining taxiways, the following points must be surveyed at the centre of the centre line marking of each taxiway, as appropriate:

- (i) intermediate holding positions and runway holding positions (including those associated with the intersection of a runway with another runway when the former runway is part of a standard taxi route) and for points established for the protection of sensitive areas for radio navigation aids;
- (ii) taxiway intersection markings;

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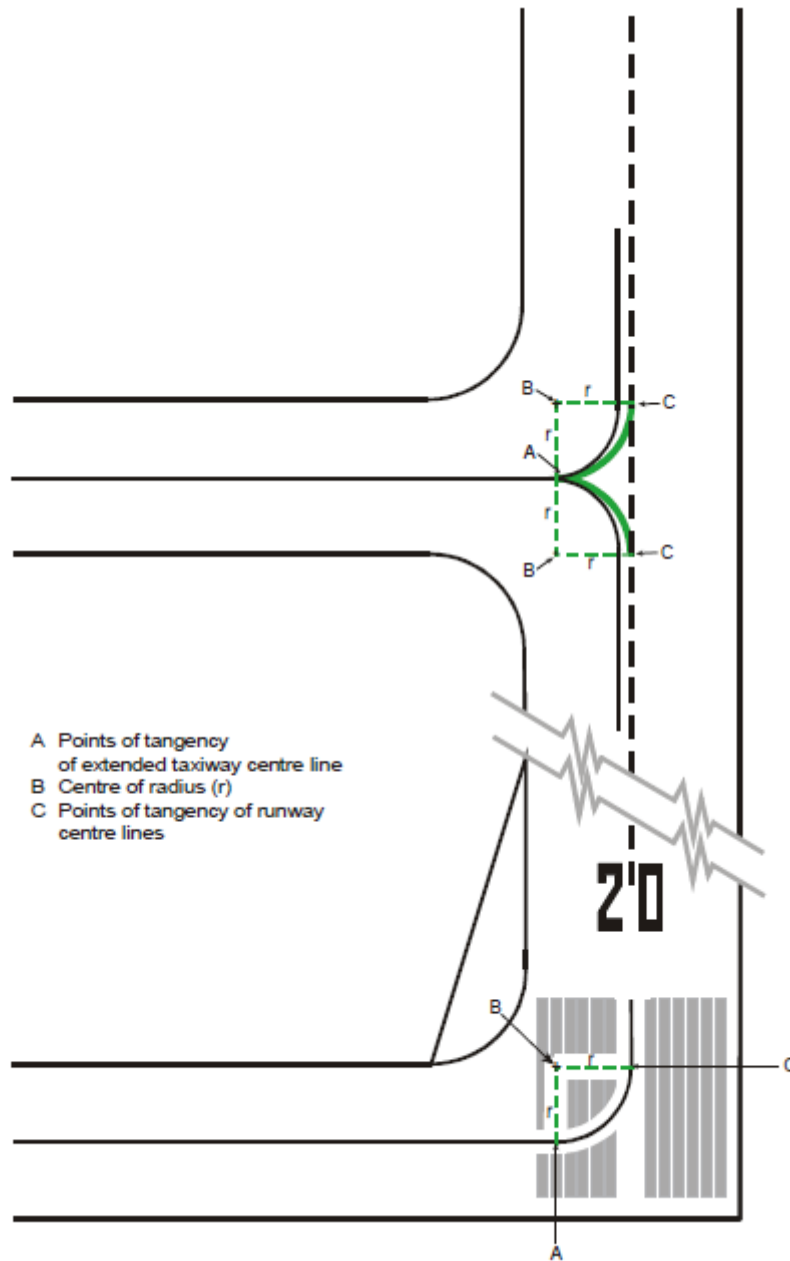
SUBPART A – AERODROME DATA (ADR.OPS.A)

- (iii) intersection of other taxiways, including taxiways described in point (c) (2) above;
- (iv) intersections of 'blocks' defined for surface movement, guidance and control systems;
- (v) commencement and end of selectable taxiway lighting systems provided as part of the surface movement, guidance and control systems, where different from subparagraph (iv) above; and

(d) Aircraft stand points

- (1) In defining the aircraft stands, the following points must be surveyed at the centre of the guide line marking of the aircraft stands, as appropriate:
 - (i) taxilane centre lines;
 - (ii) lead-in line(s);
 - (iii) turning line;
 - (iv) straight section of the turning line;
 - (v) nose wheel stopping position;
 - (vi) true heading of the alignment bar; and
 - (vii) lead-out line(s).
- (2) Where aircraft stands are utilized by more than one aircraft type and different guide line markings exist, a diagram must be prepared by the surveyor showing the arrangement of the markings in use, together with an indication of the points surveyed. Where all the stands at an aerodrome/heliport are marked uniformly, only a single diagram needs to be prepared.

The points that should be surveyed for a taxiway or an aircraft stand, are shown in the following diagrams:



Runway and taxiway intersections to be surveyed

Figure 4

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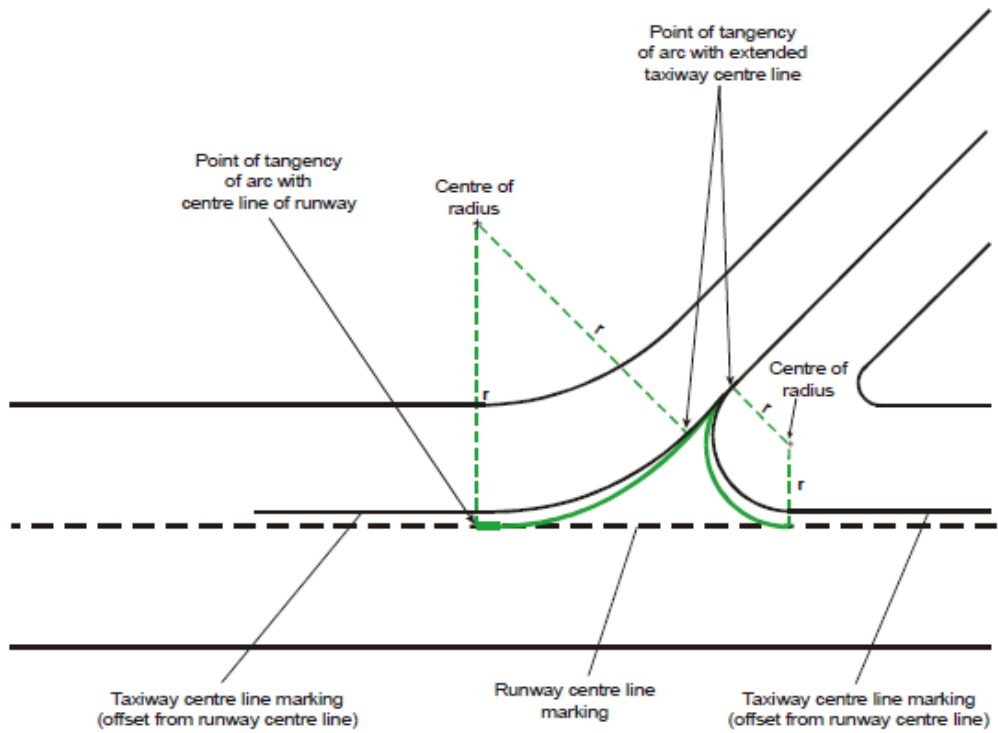


Figure 5 - Runway and taxiway intersections to be surveyed

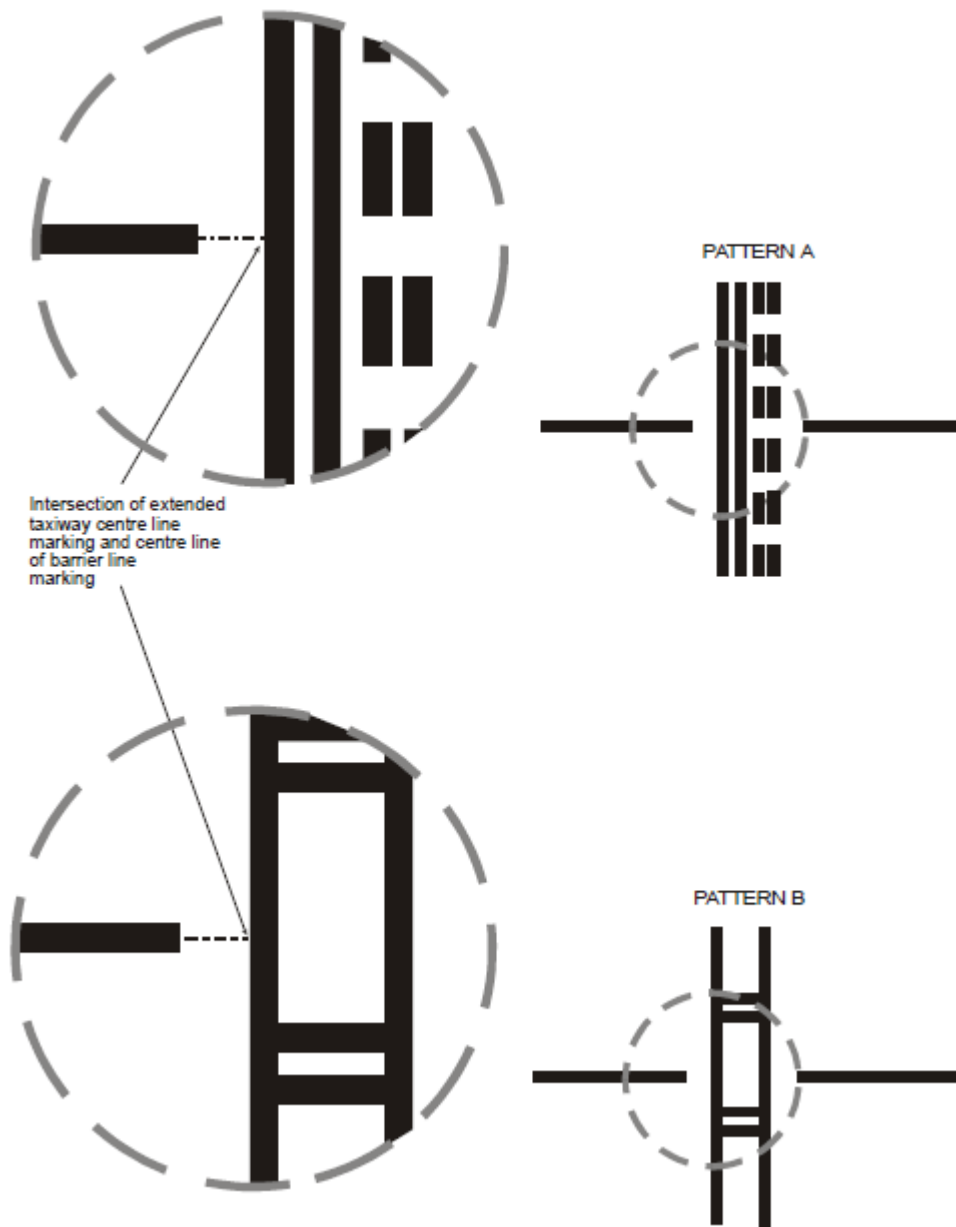


Figure 6 - Runway holding positions to be surveyed

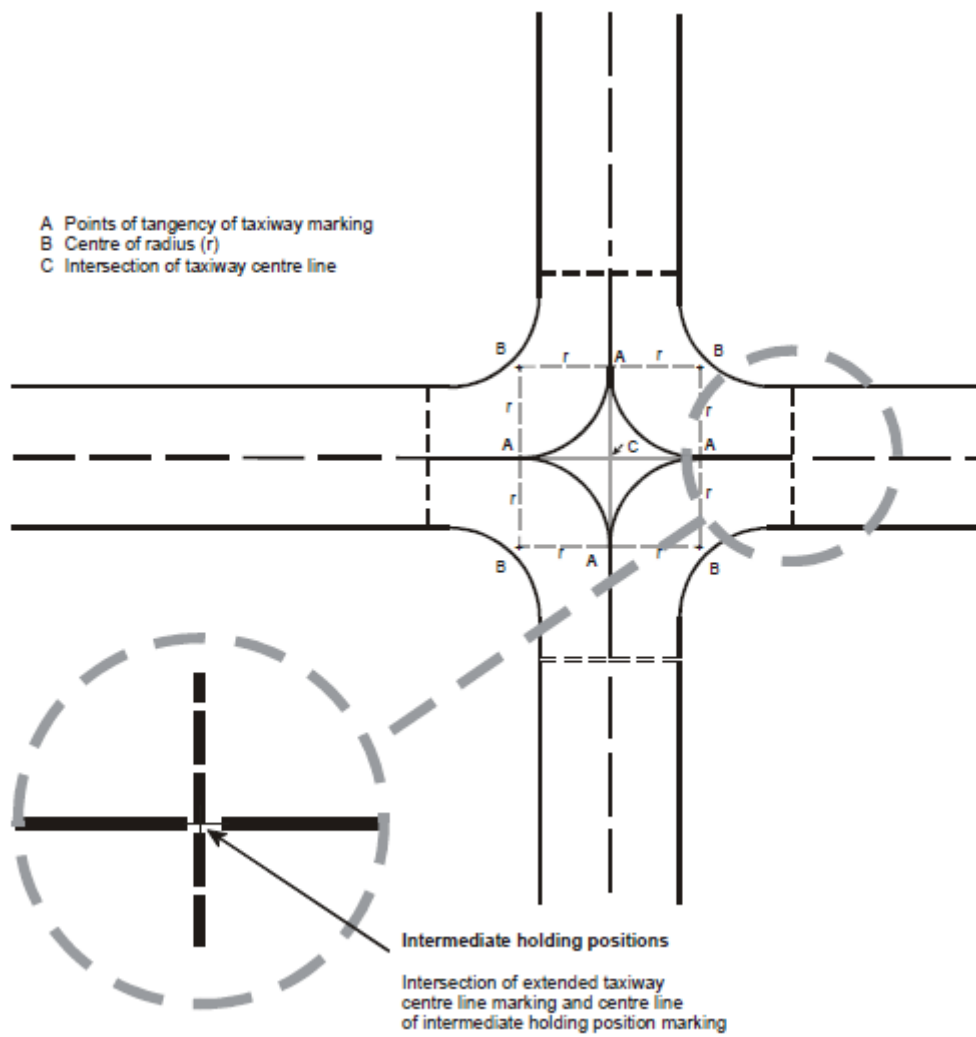


Figure 7 - Taxiway intersections to be surveyed

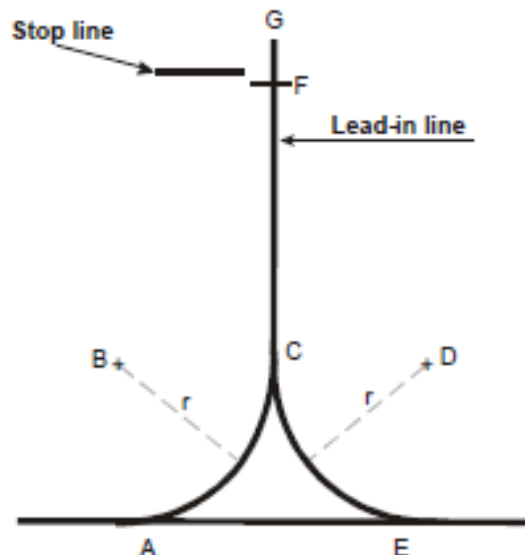


Figure 8 - Simple nose wheel lead-in line

Position	Description of point to be surveyed
A	Point of tangency of centre of lead-in marking with centre of taxilane marking
B	Centre of arc of lead-in line and radius
C	Point of tangency with centre of lead-in line marking
D	Centre of arc of lead-in line and radius
E	Point of tangency of centre of lead-in marking with centre of taxilane marking
F	Nose wheel position of parked aircraft
G	End of lead-in line marking

Table 1

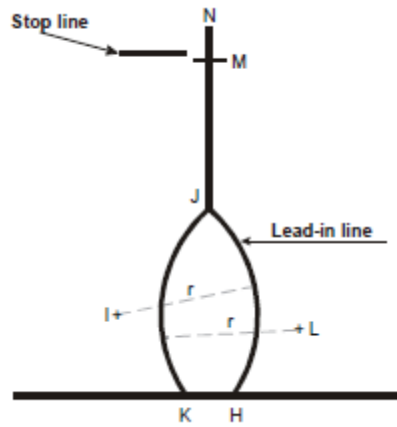


Figure 9 - Offset nose wheel lead-in line

Position	Description of point to be surveyed
H	Intersection of centre of lead-in line marking and centre of taxilane marking
I	Centre of arc of lead-in line and radius
J	Centre of commencement of straight section of lead-in line
K	Intersection of centre of lead-in line marking and centre of taxilane marking
L	Centre of arc of lead-in line and radius
M	Nosewheel position of parked aircraft
N	End of lead-in line marking

Table 2

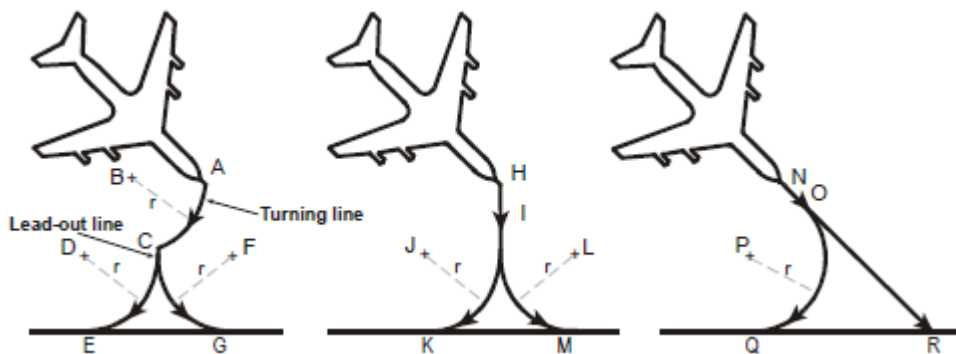


Figure 10 - Simple nose wheel lead-out lines

Position	Description of point to be surveyed
A	Centre of commencement of turning line marking
B	Centre of arc of turning line and radius

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C	Centre of intersection of turning line marking and lead-out line marking
D	Centre of arc of lead-out line and radius
E	Point of tangency of centre of lead-out line marking and taxilane marking
F	Centre of arc of lead-out line and radius
G	Point of tangency of centre of lead-out line marking and taxilane marking
H	Commencement of lead-out line
I	Centre of commencement of curved section of lead-out line
J	Centre of arc of lead-out line and radius
K	Point of tangency of centre of lead-out line marking and taxilane marking
L	Centre of arc of lead-out line and radius
M	Point of tangency of centre of lead-out line marking and taxilane marking
N	Point of tangency of centre of lead-out line marking and taxilane marking
O	Centre of commencement of curved section of lead-out line
P	Centre of arc of lead-out line and radius
Q	Point of tangency of centre of lead-out line marking and taxilane marking
R	Intersection of centre of lead-out line marking and taxilane marking

Table 3

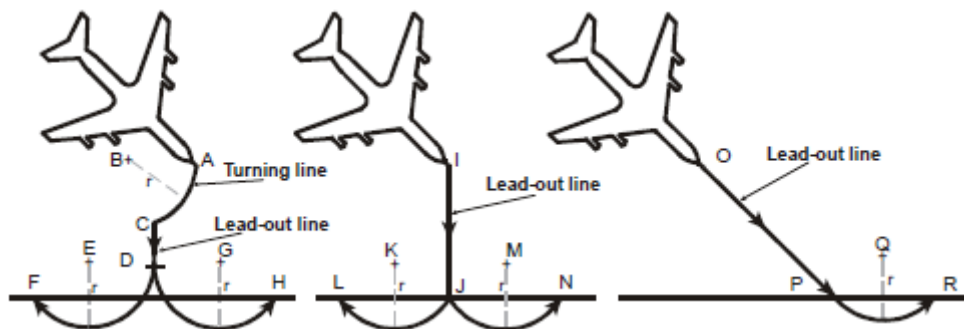


Figure 11 - Offset nose wheel lead-out lines

Position	Description of point to be surveyed
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SUBPART A – AERODROME DATA (ADR.OPS.A)

A	Centre of commencement of turning line marking
B	Centre of arc of turning line and radius
C	Centre of intersection of turning line marking and lead-out line marking
D	Centre of end of straight section of lead-out line marking
E	Centre of arc of lead-out line and radius
F	Intersection of centre of lead-out line marking and taxilane marking
G	Centre of arc of lead-out line and radius
H	Intersection of centre of lead-out line marking and taxilane marking
I	Commencement of lead-out line
J	Centre of commencement of curved section of lead-out line
K	Centre of arc of lead-out line and radius
L	Intersection of centre of lead-out line marking and taxilane marking
M	Centre of arc of lead-out line and radius
N	Intersection of centre of lead-out line marking and taxilane marking
O	Commencement of lead-out line
P	Centre of commencement of curved section of lead-out line
Q	Centre of arc of lead-out line and radius
R	Intersection of centre of lead-out line marking and taxilane marking

Table 4

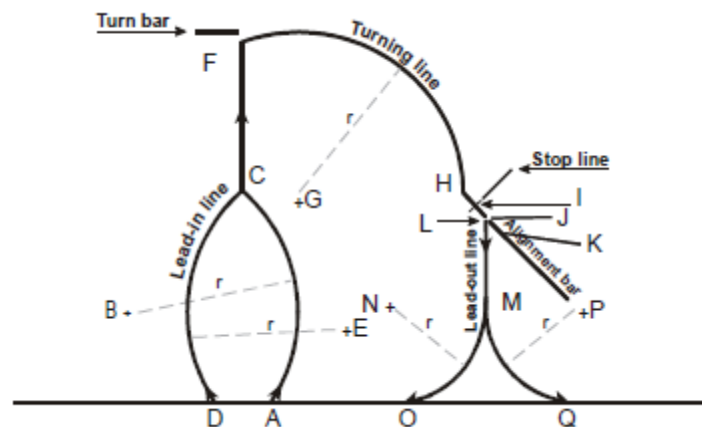


Figure 12 - Turning lines

Position	Description of point to be surveyed
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A	Intersection of centre of lead-in line marking and centre of taxilane marking
B	Centre of arc of lead-in line and radius
C	Centre of commencement of straight section of lead-in line
D	Intersection of centre of lead-in line marking and centre of taxilane marking
E	Centre of arc of lead-in line and radius
F	End of straight section of lead-in line marking/commencement of turning line marking
G	Centre of arc of turning line and radius
H	Centre of commencement of straight section of turning line marking
I	Nose wheel position of parked aircraft
J	Centre of end of straight section or turning line marking
K	True bearing of alignment bar
L	Commencement of lead-out line
M	Centre of commencement of curved section of lead-out line
N	Centre of arc of lead-out line and radius
O	Point of tangency of centre of lead-out line marking and taxilane marking
P	Centre of arc of lead-out line and radius
Q	Point of tangency of centre of lead-out line marking and taxilane marking

Table 5

GM3 ADR.OPS.A.005 (a) Aerodrome data

FRICTION MEASURING DEVICES

A continuous friction measuring device (e.g. Skiddometer, Surface Friction Tester, Mu-meter, Runway Friction Tester or GripTester), can be used for measuring the friction values for compacted snow- and ice-covered runways. A decelerometer (e.g. Tapley Meter or Brakemeter – Dynometer) may be used on certain surface conditions, e.g. compacted snow, ice and very thin layers of dry snow. Other friction measuring devices can be used, provided they have been correlated with, at least, one of the types mentioned above. A decelerometer should not be used in loose snow or slush, as it can give misleading friction values. Other friction measuring devices can also give misleading friction values under certain combinations of contaminants and air/pavement temperature.

GM4 ADR.OPS.A.005(a) Aerodrome data

COVERAGE AREAS FOR TERRAIN AND OBSTACLE DATA PROVISION

- (a) The coverage areas for sets of electronic and obstacle data should be specified as follows:
- (1) Area 1: the entire territory of the State;
 - (2) Area 2: within the vicinity of an aerodrome, sub-divided as follows:
 - (i) Area 2a: a rectangular area around a runway that comprises the runway strip plus any clearway that exists;
 - (ii) Area 2b: an area extending from the ends of Area 2a in the direction of departure, with a length of 10 km and a splay of 15 per cent to each side;
 - (iii) Area 2c: an area extending outside Area 2a and Area 2b at a distance of not more than 10 km from the boundary of Area 2a; and
 - (iv) Area 2d: an area outside the Areas 2a, 2b and 2c up to a distance of 45 km from the aerodrome reference point, or to an existing TMA boundary, whichever is nearest.
 - (3) Area 3: the area bordering an aerodrome movement area that extends horizontally from the edge of a runway to 90 m from the runway centre line, and 50 m from the edge of all other parts of the aerodrome movement area
 - (4) The area extending 900 m prior to the runway threshold, and 60 m each side of the extended runway centre line in the direction of the approach on a precision approach runway, Category II or III;
- (b) A graphical representation of the terrain data collection surfaces for Areas 1 and 2 is shown in the following figure:

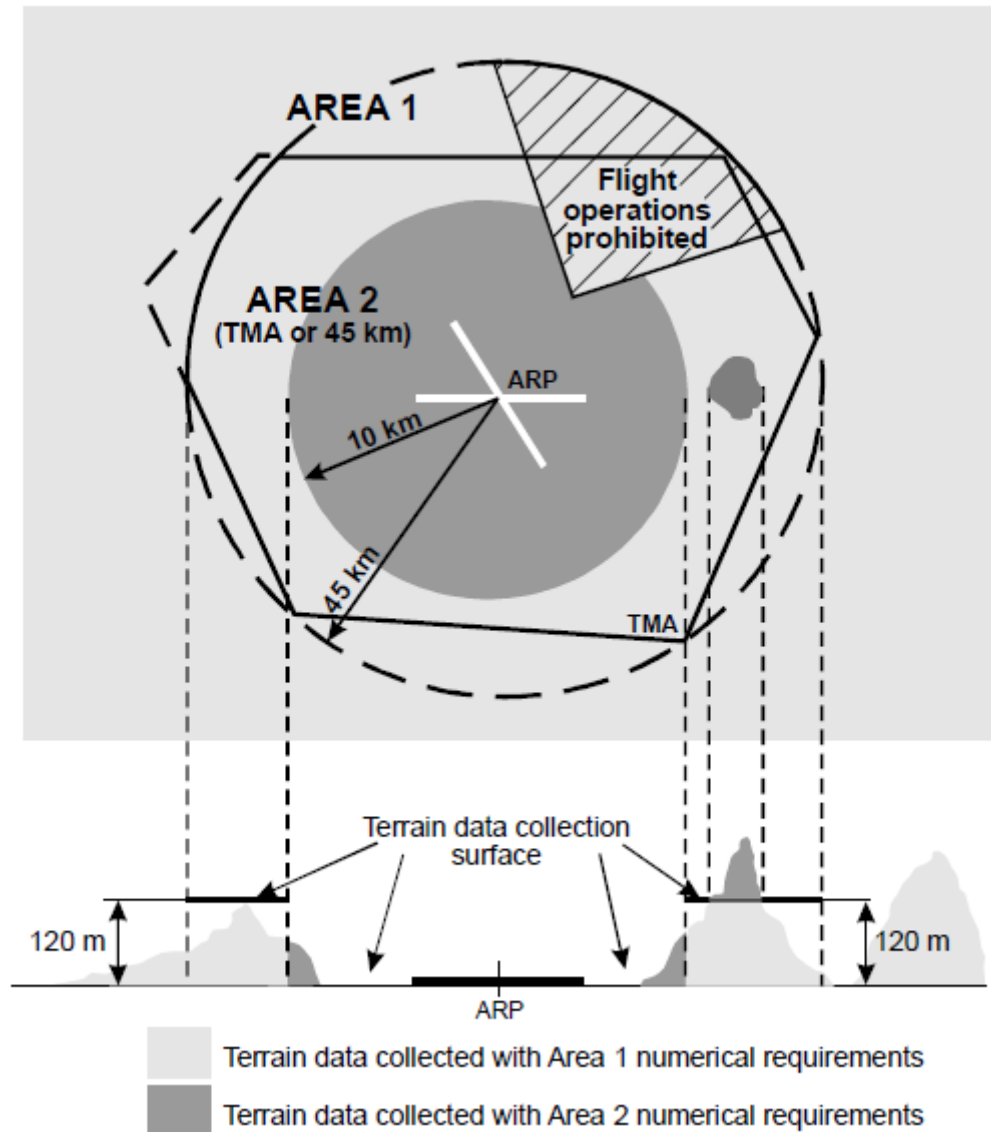


Figure 1 - Terrain data collection surfaces — Area 1 and Area 2

- (1) Within the area covered by a 10-km radius from the ARP, terrain data should comply with the Area 2 numerical requirements;
- (2) In the area between 10 km and the TMA boundary or 45-km radius (whichever is smaller), data on terrain that penetrates the horizontal plane 120 m above the lowest runway elevation, should comply with the Area 2 numerical requirements;
- (3) In the area between 10 km and the TMA boundary or 45-km radius (whichever is smaller), data on terrain that does not penetrate the horizontal plane 120 m above the lowest runway elevation, should comply with the Area 1 numerical requirements;

- (4) In those portions of Area 2 where flight operations are prohibited due to very high terrain or other local restrictions and/or regulations, terrain data should comply with the Area 1 numerical requirements.
- (c) A graphical representation of the obstacle data collection surfaces for Areas 1 and 2 is shown in the following figure:

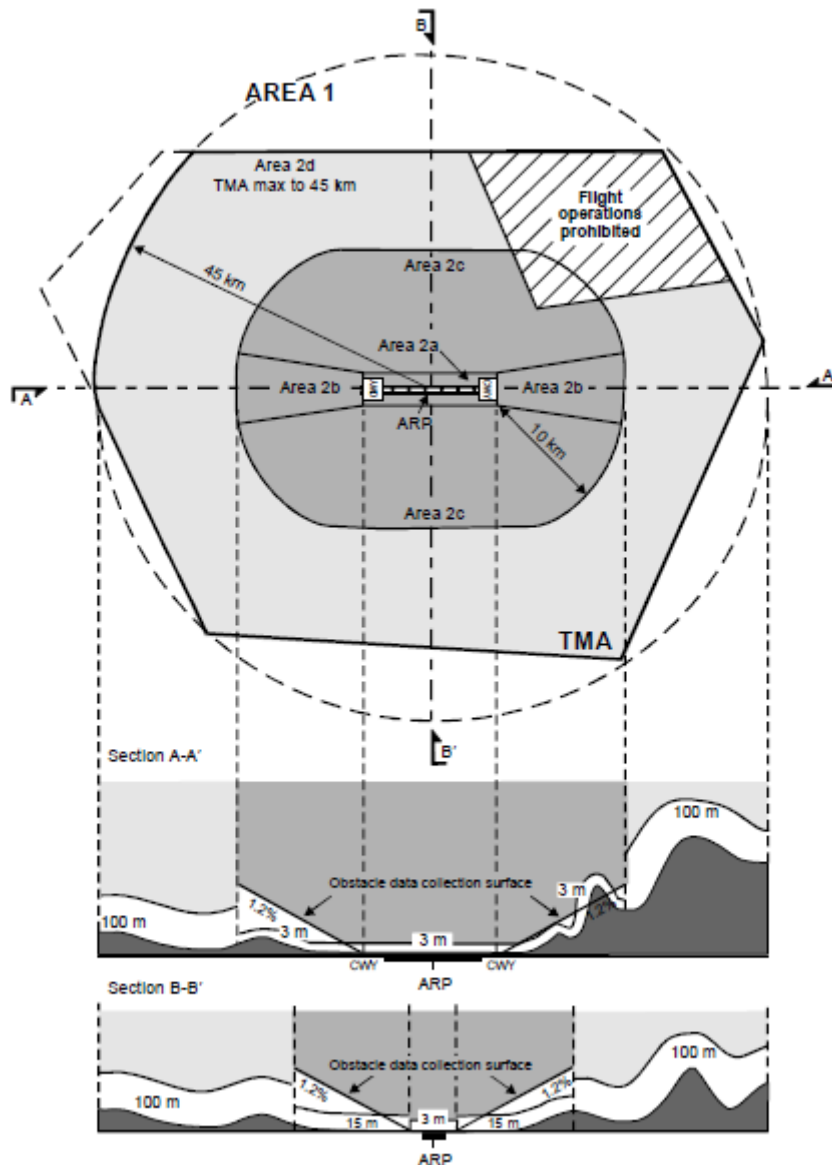


Figure 2 - Obstacle data collection surfaces — Area 1 and Area 2

- (1) Obstacle data should be collected and recorded in accordance with the Area 2 numerical requirements;

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SUBPART A – AERODROME DATA (ADR.OPS.A)

- (i) The Area 2a obstacle collection surface should have a height of 3 m above the nearest runway elevation measured along the runway centre line, and for those portions related to a clearway, if one exists, at the elevation of the nearest runway end;
 - (ii) The Area 2b obstacle collection surface has an 1.2 % slope extending from the ends of Area 2a at the elevation of the runway end in the direction of departure, with a length of 10 km and a splay of 15 % to each side;
 - (iii) The Area 2c collection surface has an 1.2 % slope extending outside Area 2a and Area 2b at a distance of not more than 10 km from the boundary of Area 2a. The initial elevation of Area 2c should be the elevation of the point of Area 2a at which it commences; and
 - (iv) The Area 2d obstacle collection surface has a height of 100 m above ground.
- (2) In those portions of Area 2 where flight operations are prohibited due to very high terrain or other local restrictions and/or regulations, obstacle data should be collected and recorded in accordance with the Area 1 requirements;
 - (3) Data on every obstacle within Area 1 whose height above the ground is 100 m or higher should be collected and recorded in the database in accordance with the Area 1 numerical requirements specified in Table 2.
- (d) A graphical representation of the terrain and obstacle data collection surfaces for Area 3 is shown in the following figure:

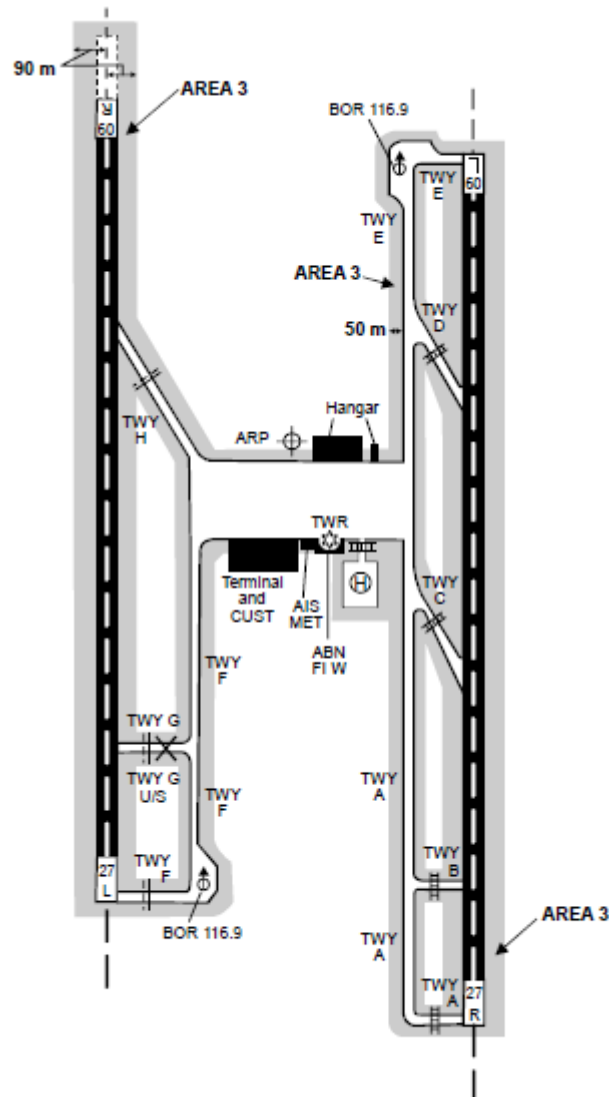


Figure 3 - Terrain and obstacle data collection surface — Area 3

- (1) The data collection surface for terrain and obstacles extends a half metre (0.5 m) above the horizontal plane passing through the nearest point on the aerodrome movement area;
 - (2) Terrain and obstacle data in Area 3 should comply with the numerical requirements specified in Tables 1 and 2, respectively;
- (e) A graphical representation of the obstacle data collection surfaces for Areas 4 is shown in the following figure:

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SUBPART A – AERODROME DATA (ADR.OPS.A)

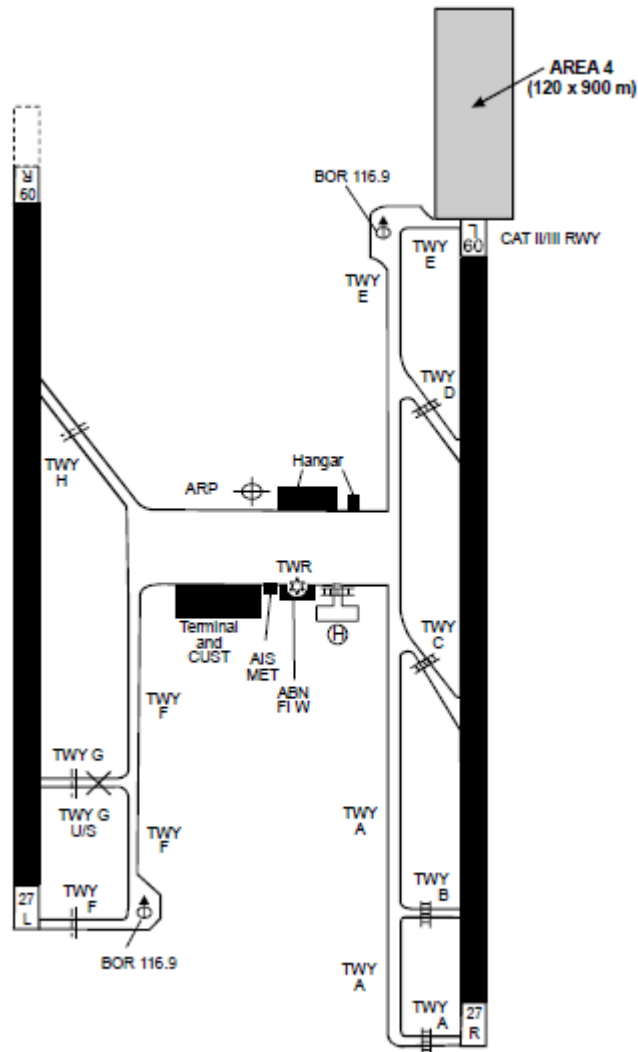


Figure 4 - Terrain and obstacle data collection surface — Area 4

- (1) Terrain data in Area 4 should comply with the numerical requirements specified in Table 1;
- (2) The horizontal extent of Area 2 covers Area 4. More detailed obstacle data may be collected in Area 4 in accordance with Area 4 numerical requirements for obstacle data specified in Table 2.
- (3) Where the terrain at a distance greater than 900 m (3000 ft) from the runway threshold is mountainous or otherwise significant, the length of Area 4 should be extended to a distance not exceeding 2000 m (6500 ft) from the runway threshold.

	Area 1	Area 2	Area 3	Area 4
Post spacing	3 arc seconds (approx. 90 m)	1 arc seconds (approx. 30 m)	0.6 arc seconds (approx. 20 m)	0.3 arc seconds (approx. 9 m)

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SUBPART A – AERODROME DATA (ADR.OPS.A)

Vertical accuracy	30 m	3 m	0.5 m	1 m
Vertical resolution	1 m	0.1 m	0.01 m	0.1 m
Horizontal accuracy	50 m	5 m	0.5 m	2.5 m
Confidence level	90 %	90 %	90 %	90 %
Data classification	Routine	Essential	Essential	Essential
Integrity level	1×10^{-3}	1×10^{-5}	1×10^{-5}	1×10^{-5}
Maintenance period	as required	as required	as required	as required

Table 1 - Terrain data numerical requirements

	Area 1	Area 2	Area 3	Area 4
Vertical accuracy	30 m	3 m	0.5 m	1 m
Vertical resolution	1 m	0.1 m	0.01 m	0.1 m
Horizontal accuracy	50 m	5 m	0.5 m	2.5 m
Confidence level	90 %	90 %	90 %	90 %
Data classification	Routine	Essential	Essential	Essential
Integrity level	1×10^{-3}	1×10^{-5}	1×10^{-5}	1×10^{-5}
Maintenance period	as required	as required	as required	as required

Table 2 - Obstacle data numerical requirements

AMC1 ADR.OPS.A.010 Data quality requirements

GENERAL REQUIREMENTS

- (a) Aeronautical data integrity requirements should be based upon the potential risk resulting from the corruption of data and upon the use to which the data item is put. Consequently, the following classifications and data integrity levels should apply:
- (1) critical data, integrity level 1×10^{-8} : there is a high probability when using corrupted critical data that the continued safe flight and landing of an aircraft would be severely at risk with the potential for catastrophe;
 - (2) essential data, integrity level 1×10^{-5} : there is a low probability when using corrupted essential data that the continued safe flight and landing of an aircraft would be severely at risk with the potential for catastrophe; and
 - (3) routine data, integrity level 1×10^{-3} : there is a very low probability when using corrupted routine data that the continued safe flight and landing of an aircraft would be severely at risk with the potential for catastrophe.
- (b) The aerodrome operator should determine and report aerodrome-related aeronautical data in accordance with the accuracy and integrity requirements set in the following tables:

Latitude and longitude	Accuracy Data Type	Integrity Classification
Aerodrome reference point	30 m surveyed/calculated	1×10^{-3} routine
Nav aids located at the aerodrome	3 m surveyed	1×10^{-5} essential
Obstacles in Area 3	0.5 m surveyed	1×10^{-5} essential
Obstacles in Area 2 (the part within the aerodrome boundary)	5 m surveyed	1×10^{-5} essential
Runway thresholds	1 m surveyed	1×10^{-8} critical
Runway end (flight path alignment point)	1 m surveyed	1×10^{-8} critical
Runway centre line points	1 m surveyed	1×10^{-8} critical
Runway-holding position	0.5 m surveyed	1×10^{-8} critical
Taxiway centre line/parking guidance line points	0.5 m surveyed	1×10^{-5} essential
Taxiway intersection marking line	0.5 m surveyed	1×10^{-5} essential
Exit guidance line	0.5 m surveyed	1×10^{-5} essential
Apron boundaries (polygon)	1 m surveyed	1×10^{-3} Routine
De-icing/anti-icing facility (polygon)	1 m surveyed	1×10^{-3} Routine
Aircraft stand points/INS checkpoints	0.5 m surveyed	1×10^{-3} Routine

Table 1 – Latitude and longitude

Elevation/altitude/height	Accuracy data type	Integrity classification
Aerodrome elevation	0.5 m surveyed	1×10^{-5} essential
WGS-84 geoid undulation at aerodrome elevation position	0.5 m surveyed	1×10^{-5} essential
Runway threshold, non-precision approaches	0.5 m surveyed	1×10^{-5} essential
WGS-84 geoid undulation at runway threshold, non-precision approaches	0.5 m surveyed	1×10^{-5} essential
Runway threshold, precision approaches	0.25 m surveyed	1×10^{-8} critical
WGS-84 geoid undulation at runway threshold, precision approaches	0.25 m surveyed	1×10^{-8} critical
Runway centre line points	0.25 m surveyed	1×10^{-8} critical
Taxiway centre line/parking guidance line points	1 m surveyed	1×10^{-5} essential
Obstacles in Area 2 (the part within the aerodrome boundary)	3 m surveyed	1×10^{-5} essential
Obstacles in Area 3	0.5 m surveyed	1×10^{-5} essential
Distance measuring equipment/precision (DME/P)	3 m surveyed	1×10^{-5} essential

Table 2 – Elevation/Altitude/Height

Declination/variation	Accuracy data type	Integrity classification
Aerodrome magnetic variation	1 degree surveyed	1×10^{-5} essential
ILS localizer antenna magnetic variation	1 degree surveyed	1×10^{-5} essential
MLS azimuth antenna magnetic variation	1 degree surveyed	1×10^{-5} essential

Table 3 – Declination and magnetic variation

Bearing	Accuracy data type	Integrity classification
ILS localizer alignment	1/100 degree surveyed	1×10^{-5} essential
MLS zero azimuth alignment	1/100 degree surveyed	1×10^{-5} essential
Runway bearing (True)	1/100 degree surveyed	1×10^{-3} routine

Table 4 - Bearing

Length/distance/dimension	Accuracy data type	Integrity classification
Runway length	1 m surveyed	1×10^{-8} critical
Runway width	1 m surveyed	1×10^{-5} essential
Displaced threshold distance	1 m surveyed	1×10^{-3} routine
Stopway length and width	1 m surveyed	1×10^{-8} critical
Clearway length and width	1 m surveyed	1×10^{-5} essential
Landing distance available	1 m surveyed	1×10^{-8} critical
Take-off run available	1 m surveyed	1×10^{-8} critical

Take-off distance available	1 m surveyed	1×10^{-8} critical
Accelerate-stop distance available	1 m surveyed	1×10^{-8} critical
Runway shoulder width	1 m surveyed	1×10^{-5} essential
Taxiway width	1 m surveyed	1×10^{-5} essential
Taxiway shoulder width	1 m surveyed	1×10^{-5} essential
ILS localizer antenna-runway end, distance	3 m calculated	1×10^{-3} routine
ILS glide slope antenna-threshold, distance along centre line	3 m calculated	1×10^{-3} routine
ILS marker-threshold distance	3 m calculated	1×10^{-5} essential
ILS DME antenna-threshold, distance along centre line	3 m calculated	1×10^{-5} essential
MLS azimuth antenna-runway end, distance	3 m calculated	1×10^{-3} routine
MLS elevation antenna-threshold, distance along centre line	3 m calculated	1×10^{-3} routine
MLS DME/P antenna-threshold, distance along centre line	3 m calculated	1×10^{-5} essential

Table 5 – Length/distance/dimension

- (c) Accuracy requirements for aeronautical data should be based upon a 95 % confidence level and, in that respect, three types of positional data should be identified: surveyed points (e.g. runway threshold), calculated points (mathematical calculations from the known surveyed points of points in space, fixes) and declared points (e.g. flight information region boundary points).
- (d) Geographical coordinates indicating latitude and longitude should be determined and reported to the aeronautical information services in terms of the World Geodetic System — 1984 (WGS-84) geodetic reference datum, identifying those geographical coordinates which have been transformed into WGS-84 coordinates by mathematical means, and whose accuracy of original field work does not meet the requirements in Table 3.

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- (e) The order of accuracy of the field work should be such that the resulting operational navigation data for the phases of flight will be within the maximum deviations, with respect to an appropriate reference frame, as indicated in the Tables 3–7.
- (f) In addition to the elevation (referenced to mean sea level) of the specific surveyed ground positions at aerodromes, geoid undulation (referenced to the WGS-84 ellipsoid) for those positions as indicated in Tables 3–7, should be determined and reported to the aeronautical information services authority.
- (g) Protection of electronic aeronautical data while stored or in transit, should be totally monitored by the cyclic redundancy check (CRC). To achieve protection of the integrity level of critical, and essential aeronautical data as classified in (a)(1) and (a)(2) above, a 32- or 24-bit CRC algorithm should apply respectively.
- (h) To achieve protection of the integrity level of routine aeronautical data as classified in (a)(3) above, a 16-bit CRC algorithm should apply.
- (i) The aerodrome operator should implement the procedures to:
 - (1) monitor data relevant to the aerodrome and available services originating from the aerodrome operator, and promulgated by the relevant air traffic services providers;
 - (2) notify the relevant aeronautical information services, and air traffic services providers of any changes necessary to ensure correct and complete data relevant to the aerodrome, and available services.

AMC2 ADR.OPS.A.010 Data quality requirement

FORMAL ARRANGEMENTS

(a) Organisations concerned

The aerodrome operator should have formal arrangements with public or private entities providing:

- (1) air navigation services;
- (2) services for the origination and provision of survey data;
- (3) procedure design services;
- (4) electronic terrain data; and
- (5) electronic obstacle data,

with which it exchanges aeronautical data and/or aeronautical information.

(b) Content of formal arrangements

Such formal arrangements should include the following minimum content:

- (1) the scope of aeronautical data or aeronautical information to be provided;
- (2) the accuracy, resolution, and integrity requirements for each data item supplied;
- (3) the required methods for demonstrating that the data provided conforms with the specified requirements;
- (4) the nature of action to be taken in the event of discovery of a data error, or inconsistency in any data provided;

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SUBPART A – AERODROME DATA (ADR.OPS.A)

- (5) the following minimum criteria for notification of data changes:
 - (i) criteria for determining the timeliness of data provision based on the operational or safety significance of the change;
 - (ii) any prior notice of expected changes;
 - (iii) the means to be adopted for notification;
- (6) the party responsible for documenting data changes;
- (7) the means to resolve any potential ambiguities caused where different formats are used to exchange aeronautical data or aeronautical information;
- (8) any limitations on the use of data;
- (9) requirements for the production of quality reports by data providers to facilitate verification of data quality by the data users;
- (10) metadata requirements; and
- (11) contingency requirements concerning the continuity of data provision.

AMC1 ADR.OPS.A.015 Coordination between aeronautical information services , air traffic services

REPORTING

- (a) The aerodrome operator should report on matters of operational significance or affecting aircraft and aerodrome operations in order to take appropriate action, particularly in respect of the following:
 - (1) construction or maintenance work;
 - (2) rough or broken surfaces on a runway, a taxiway, or an apron;
 - (3) snow, slush, ice, wet ice, wet snow on ice, or frost on a runway, a taxiway, or an apron;
 - (4) water on a runway, a taxiway, or an apron;
 - (5) snow banks or drifts adjacent to a runway, a taxiway, or an apron;
 - (6) anti-icing or de-icing liquid chemicals, or other contaminants on a runway, a taxiway, or an apron;
 - (7) other temporary hazards, including parked aircraft;
 - (8) failure or irregular operation of part or all of the aerodrome visual aids; and
 - (9) failure of the normal or secondary power supply.
- (b) A change in the level of protection normally available at an aerodrome for rescue and firefighting should be expressed in terms of the new category available at the aerodrome. When such a change has been corrected, the air traffic services provider and the aeronautical information services providers should be advised accordingly.
- (c) The aerodrome operator should observe the predetermined, internationally agreed AIRAC effective dates in addition to 14-day postage time when submitting the raw information/data to aeronautical information services that affect charts and/or computer-

based navigation systems which qualify to be notified by the aeronautical information regulation and control (AIRAC) system.

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SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B)

**SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT, AND
INSTALLATIONS**

GM1 ADR.OPS.B.001 Provision of operational services

SERVICES

The services included in Part B of this Annex, need to be provided at an aerodrome. In some cases, these services are not directly provided by the aerodrome operator, but by another organisation or State entity. However, the aerodrome operator, being responsible for the operation of the aerodrome should have arrangements and interfaces with these organisations or entities to ensure the provision of services according to the legal requirements. The method described above meets with the intention of an integrated Safety Management System that helps the aerodrome operator to ensure the safety objective of the service provision.

AMC1 ADR.OPS.B.005 Aerodrome Emergency Planning

GENERAL

- (a) The aerodrome operator should ensure that the plan includes the ready availability of, and coordination with, appropriate specialist rescue services to be able to respond to emergencies where an aerodrome is located close to water and/or swampy areas, and where a significant portion of approach or departure operations takes place over these areas.
- (b) The aerodrome operator should ensure that an assessment of the approach and departure areas within 1000 m of the runway threshold is carried out to determine the options available for intervention.

AMC2 ADR.OPS.B.005 Aerodrome Emergency Planning

AERODROME EMERGENCY PLAN DOCUMENT

The aerodrome operator should include, at least, the following in the aerodrome emergency plan document:

- (a) Types of emergencies planned for;
- (b) Agencies involved in the plan, and details of the aerodrome and local emergency planning arrangements and forums;
- (c) Responsibility and role of each agency, the emergency operations centre, and the command post for each type of emergency;
- (d) Information on names and telephone numbers of offices or people to be contacted in the case of a particular emergency; and
- (e) A grid map of the aerodrome and its immediate surroundings, approximately at a distance of 5 nautical miles (8 km) from the centre of the aerodrome.

AMC/GM to Annex III – Part-OPS

SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B)**AMC3 ADR.OPS.B.005 Aerodrome emergency planning**

AERODROME EMERGENCY EXERCISE

The aerodrome operator should ensure that the emergency plan is tested with:

- (a) a full-scale aerodrome emergency exercise at intervals not exceeding two years; and
- (b) partial emergency exercises in the intervening year to ensure that any deficiencies found during the full-scale aerodrome emergency exercise have been corrected

and reviewed thereafter, or after an actual emergency, so as to correct any deficiency found during such exercises or actual emergency.

GM1 ADR.OPS.B.005 Aerodrome emergency planning

PURPOSE OF THE AERODROME EMERGENCY PLAN

- (a) In many cases the aerodrome emergency plan is part of a National or Local Emergency Plan, and the responsibility for its development is assigned to another entity, different from the aerodrome operator. However, this does not prevent the aerodrome operator from preparing its own plan describing the actions that should be taken during an emergency, in cooperation with the authorities which are responsible for the National or Local Emergency Plan.
- (b) The aerodrome emergency plan should cover an area of approximately 5 nautical miles (8 km) from the centre of the aerodrome.
- (c) Irrespective of whose responsibility is the establishment and implementation of an emergency plan covering emergencies at or in the surroundings of an aerodrome, the emergency plan should ensure that there are provisions for:
 - (1) orderly and efficient transition from normal to emergency operations;
 - (2) delegation of authority;
 - (3) assignment of emergency responsibilities;
 - (4) authorising key personnel for actions contained in the plan;
 - (5) coordination of efforts to cope with the emergency; and
 - (6) safe continuation of aircraft operations or return to normal operations as soon as possible.

GM2 ADR.OPS.B.005 Aerodrome emergency planning

COORDINATION WITH OTHER AGENCIES/ORGANISATIONS

- (a) The aerodrome emergency plan should describe the procedures for coordinating the response of different aerodrome agencies/organisations or services (e.g. ground handlers, airlines, security services) and those agencies in the surrounding community that could be of assistance in responding to an emergency.

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SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
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- (b) If the aerodrome emergency plan is not part of a National or Local Emergency Plan, then it should be coordinated as required.
- (c) Emergency mutual aid agreements should be established to define responsibilities and/or liabilities of each external agency responding to an emergency. These agreements should include the following:
 - (1) clarification of the political and jurisdictional responsibilities of the several agencies (e.g. police, local fire fighting services, local authorities, accident investigation bodies, etc.) that could be involved in order to avoid problems when an emergency occurs;
 - (2) establishment of the command authority; i.e. a single on-the-scene commander (with designated alternates if necessary);
 - (3) designation of communication priorities at the accident site;
 - (4) organisation of emergency transportation facilities under (a) pre-designated coordinator(s);
 - (5) predetermination of the legal authorities and liabilities of all cooperating emergency personnel; and
 - (6) pre-arrangements for use of portable and heavy rescue equipment from available sources.
- (d) The aerodrome emergency plan should be implemented similarly whether it is an on-airport or an off-airport aircraft accident/incident.
- (e) Rendezvous signs and directional arrows should be consistent, and conform to national standards.
- (f) The aerodrome operator should assess the level of medical supplies to be held on the aerodrome for emergency purposes.

GM3 ADR.OPS.B.005 Aerodrome emergency planning

AERODROME EMERGENCY PLAN DOCUMENT

- (a) The aerodrome emergency plan of the aerodrome operator should observe human factors principles to ensure optimum response in emergency operations.
- (b) In order to ensure that the aerodrome emergency plan document fully serves its purpose, it should include the following:
 - (1) plans for dealing with emergencies occurring at the aerodrome or in its surroundings, including the malfunction of aircraft in flight; structural fires; sabotage, including bomb threats (aircraft or structure); unlawful seizure of aircraft; and incidents on the airport covering 'during the emergency' and 'after the emergency' considerations;
 - (2) details of tests for aerodrome facilities and equipment to be used in emergencies such as emergency operations centre, mobile command post, fire fighting vehicles

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SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
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and equipment, communication means, first aid medical supplies, etc., including the frequency of those tests;

- (3) details of exercises to test emergency plans, including the frequency of those exercises;
- (4) a list of organisations, agencies, and persons of authority, both on and off-airport, for site roles; their telephone and fax numbers, e-mail and SITA addresses, and the radio frequencies of their offices;
- (5) the establishment of an aerodrome emergency committee to organise training and other preparations for dealing with emergencies;
- (6) the appointment of an on-the-scene commander for the overall emergency operation; and
- (7) Details of the off aerodrome areas for which the aerodrome RFFS will provide a response, and the size and nature of the response.

GM4 ADR.OPS.B.005 Aerodrome emergency planning

CONTENTS OF AN AERODROME EMERGENCY PLAN DOCUMENT

The purpose of the aerodrome Emergency Plan Document is to provide all the required information to agencies and staff involved in an emergency. The document should be structured in such a manner, that the required information is easily identifiable. For that purpose, the structure of the aerodrome emergency plan should be as follows:

Section 1 – Emergency telephone numbers

This section should be limited to essential telephone, numbers according to the aerodrome needs, including:

- (a) air traffic services unit;
- (b) rescue and firefighting services (fire departments);
- (c) airfield operations department;
- (d) police and security;
- (e) medical services:
 - (1) hospitals;
 - (2) ambulances; and
 - (3) doctors – business/residence;
- (f) aircraft operators;
- (g) ground handling agencies;
- (h) government authorities;
- (i) civil defence; and

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- (j) others.

Section 2 – Aircraft accident on the airport

- (a) Action by air traffic services unit;
- (b) Action by rescue and firefighting services;
- (c) Action by police and security services;
- (d) Action by the aerodrome operator:
 - (1) vehicle escort; and
 - (2) maintenance;
- (e) Action by medical services:
 - (1) hospitals;
 - (2) ambulances;
 - (3) doctors; and
 - (4) medical personnel.
- (f) Action by aircraft operator involved;
- (g) Action by emergency operations centre and mobile command post;
- (h) Action by government authorities;
- (i) Communication network (emergency operations centre and mobile command post);
- (j) Action by agencies organisations involved in mutual aid emergency agreements;
- (k) Action by transportation authorities (land, sea, air);
- (l) Action by public information officer(s);
- (m) Action by local fire departments when structures involved; and
- (n) Action by all other agencies.

Section 3 – Aircraft accident off the airport

- (a) Action by air traffic services unit;
- (b) Action by rescue and firefighting services;
- (c) Action by local fire departments;
- (d) Action by police and security services;
- (e) Action by aerodrome operator;
- (f) Action by medical services:
 - (i) hospitals;
 - (ii) ambulances;

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- (iii) doctors; and
- (iv) medical personnel.
- (g) Action by agencies involved in mutual aid emergency agreements;
- (h) Action by aircraft operator involved;
- (i) Action by emergency operations centre and mobile command post;
- (j) Action by government authorities;
- (k) Action by communication networks (emergency operations centre and mobile command post);
- (l) Action by transportation authorities (land, sea, air);
- (m) Action by public information officer; and
- (n) Action by all other agencies.

Section 4 – Malfunction of aircraft in flight (Full emergency or local standby)

- (a) Action by air traffic services unit;
- (b) Action by airport rescue and firefighting services;
- (c) Action by police and security services;
- (d) Action by the aerodrome operator;
- (e) Action by medical services:
 - (1) hospitals;
 - (2) ambulances;
 - (3) doctors; and
 - (4) medical personnel.
- (f) Action by aircraft operator involved;
- (g) Action by emergency operations centre and mobile command post; and
- (h) Action by all other agencies.

Section 5 – Structural fires

- (a) Action by air traffic services unit;
- (b) Action by rescue and firefighting services (local fire department);
- (c) Action by police and security services;
- (d) Action by airport authority;
- (e) Evacuation of structure;
- (f) Action by medical services:

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- (1) hospitals;
 - (2) ambulances;
 - (3) doctors; and
 - (4) medical personnel.
- (g) Action by emergency operations centre and mobile command post;
 - (h) Action by public information officer; and
 - (i) Action by all other agencies.

Section 6 – Sabotage including bomb threat (aircraft or structure)

- (a) Action by air traffic services unit;
- (b) Action by emergency operations centre and mobile command post;
- (c) Action by police and security services;
- (d) Action by the aerodrome operator;
- (e) Action by rescue and firefighting services;
- (f) Action by medical services:
 - (1) hospitals;
 - (2) ambulances;
 - (3) doctors; and
 - (4) medical personnel.
- (g) Action by aircraft operator involved;
- (h) Action by government authorities;
- (i) Isolated aircraft parking position;
- (j) Evacuation;
- (k) Searches by dogs and trained personnel;
- (l) Handling and identification of luggage and cargo on board aircraft;
- (m) Handling and disposal of suspected bomb;
- (n) Action by public information officer; and
- (o) Action by all other agencies.

Section 7 – Unlawful seizure of aircraft

- (a) Action by air traffic services unit;
- (b) Action by rescue and firefighting services;
- (c) Action by police and security services;

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- (d) Action by the aerodrome operator;
- (e) Action by medical services;
 - (1) hospitals;
 - (2) ambulances;
 - (3) doctors; and
 - (4) medical personnel.
- (f) Action by aircraft operator involved;
- (g) Action by government authorities;
- (h) Action by emergency operations centre and mobile command post;
- (i) Isolated aircraft parking position;
- (j) Action by public information officer; and
- (k) Action by all other agencies.

Section 8 – Incident on the airport

An incident on the airport could require any, or all of the actions detailed in Section 2, 'Aircraft accident on the airport'. Examples of incidents the aerodrome operator should consider to include: fuel spills at the ramp, passenger loading bridge, and fuel storage area; dangerous goods occurrences at freight handling areas; collapse of structures; vehicle/aircraft collisions; etc.

Section 9 – Persons of authority – site roles

To include, but not limited to, the following, according to local requirements:

- (a) On-airport:
 - (1) Aerodrome chief fire officer;
 - (2) Airport authority;
 - (3) Police and security – Officer-in-charge; and
 - (4) Medical coordinator.
- (b) Off-airport:
 - (1) Local chief fire officer;
 - (2) Government authority; and
 - (3) Police and security – officer-in-charge.

The on-the-scene commander will be designated as required from within the pre-arranged mutual aid emergency agreement.

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SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
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GM5 ADR.OPS.B.005 Aerodrome Emergency Planning

TYPES OF EMERGENCIES

- (a) At least the following types of emergencies may be included in the aerodrome emergency plan:
- (1) Aircraft emergencies;
 - (2) Aircraft ground incidents, where an aircraft on the ground is known to have an emergency situation other than an accident, requiring the attendance of emergency services;
 - (3) Sabotage, including bomb threats;
 - (4) Unlawfully seized aircraft;
 - (5) Dangerous goods occurrences;
 - (6) Building fires;
 - (7) Natural disasters; and
 - (8) Public health emergencies.
- (b) The aircraft emergencies for which services may be required are generally classified as:
- (1) 'aircraft accident': an aircraft accident which has occurred on or in the vicinity of the airport;
 - (2) 'full emergency': an aircraft approaching the airport is, or is suspected to be, in such trouble that there is imminent danger of an accident; and
 - (3) 'local standby': an aircraft approaching the airport is known, or is suspected to have developed some defect, but the trouble is not such as would normally involve any serious difficulty in effecting a safe landing.

GM6 ADR.OPS.B.005 Aerodrome emergency planning

INVOLVED AGENCIES IN EMERGENCIES

The following agencies could participate in response to an emergency, depending on the type of emergency and local arrangements:

- (a) On the aerodrome:
- (1) Air Traffic Control Unit;
 - (2) Rescue and firefighting services;
 - (3) Aerodrome administration;
 - (4) Medical and ambulance services;
 - (5) Aircraft operators;
 - (6) Ground handling agencies;
 - (7) Security services; and

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- (8) Police.
- (b) Off the aerodrome:
 - (1) Fire departments;
 - (2) Police;
 - (3) Health authorities (including medical, ambulance, hospital and public health services);
 - (4) Military; and
 - (5) Harbour or coast guard, if applicable.

GM7 ADR.OPS.B.005 Aerodrome emergency planning

EMERGENCY OPERATIONS CENTRE

- (a) The practice had shown that emergencies are handled more efficiently centrally through an emergency operations centre and a command post.
- (b) The emergency operations centre could be a part of the aerodrome facilities, and responsible for the overall coordination and general direction of the response to an emergency. Depending on the size of the aerodrome and local procedures, more than one emergency centres could be established, but within the aerodrome emergency plan should be identified which of them has the overall responsibility for coordination.
- (c) A person should be assigned to assume control of the emergency operations centre and, when appropriate, another person the command post.
- (d) The role of the emergency operations centre should be to support the on-the-scene commander in the mobile command post for aircraft accidents/incidents.
- (e) The emergency operations centre, depending on relevant security plans and local procedures could be the command, coordination, and communication centre for unlawful seizure of aircraft and bomb threats.
- (f) The emergency operations centre should be operationally available 24 hours a day, or during the aerodrome's hours of operation, and procedures should be established for notifying its staff.
- (g) The location of the emergency operation centre is very important for its efficiency. Consideration should be given to establish its location having a clear view of the movement area and isolated aircraft parking position, wherever possible.
- (h) Adequate equipment and personnel should be available in order to communicate with the appropriate agencies involved in the emergency, including the mobile post, when this is deployed. The communication and electronic devices should be checked regularly, to identify any malfunctions.

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GM8 ADR.OPS.B.005 Aerodrome emergency planning

MOBILE COMMAND POST

- (a) The command post should be a facility capable of being moved rapidly to the site of an emergency, when required, and should undertake the local coordination of those agencies responding to the emergency.
- (b) The mobile command post, when established, should contain the necessary equipment and personnel to communicate with all agencies involved in the emergency, including the emergency operations centre. The communication and electronic devices should be checked regularly, in order to identify any malfunctions.
- (c) Maps, charts, and other relevant equipment and information should be available at the mobile command post.

GM9 ADR.OPS.B.005 Aerodrome emergency planning

COMMUNICATION SYSTEMS USED FOR EMERGENCIES

- (a) When established, adequate communication systems linking the command post and the emergency operations centre with each other and with the participating agencies should be provided in accordance with the plan, and consistent with the particular requirements of the aerodrome.
- (b) The communication systems used should include a sufficient number of radio transceivers, telephones, and other communication devices to establish and maintain a primary, and a secondary means of communication;
- (c) The role of the communication systems is to provide a primary, and, where necessary, an alternate means for effective direct communications between the following, as applicable:
 - (1) the alerting authority and the rescue and firefighting (RFF) units serving the airport;
 - (2) air traffic services unit, the appropriate fire department alarm room/dispatch centre(s) and the firefighting and rescue crews en route to an aircraft emergency and at the accident/incident site;
 - (3) appropriate mutual aid agencies located on or off the airport, including an alert procedure for all auxiliary personnel expected to respond; and
 - (4) the RFF vehicles, including a communication capability between crew members on each RFF vehicle.
- (d) A communications system should be established in order to provide rapid response of the emergency equipment to accidents and incidents occurring in the terminal areas, and at the apron. Apron accidents include aircraft cabin fires, refuelling spills and fires, aircraft and vehicle collisions, and medical emergencies.
- (e) Communication systems used during emergencies should be tested regularly to verify the operability of all radio and telephone networks.

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- (f) A complete and current list of interagency telephone numbers should be available to all agencies and to personnel responsible for the aerodrome emergency plan, to ensure rapid notification in case of emergencies. These phone numbers should be verified frequently to ensure they are correct. Updated lists should be distributed to all emergency plan participants on a continual basis.

GM10 ADR.OPS.B.005 Aerodrome emergency planning

EMERGENCIES IN DIFFICULT ENVIRONMENT

At those aerodromes located close to water and/or swampy areas, or difficult terrain, the aerodrome emergency plan should include the establishment, testing, and assessment at regular intervals of a predetermined response for the specialist rescue services.

GM11 ADR.OPS.B.005 Aerodrome emergency planning

EMERGENCY EXERCISES

- (a) Full-scale exercises
- (1) The purpose of a full-scale exercise is to ensure the adequacy of the plan to cope with different types of emergencies.
 - (2) Full-scale emergency exercises should be supported by all aerodrome and community authorities concerned.
 - (3) Objectives of the exercise should be defined.
 - (4) Involved departments and agencies should be thoroughly familiar with the airport emergency plan, and develop individual plans in coordination with the general plan.
 - (5) The emergency exercises should be held in locations which will provide maximum realism while ensuring minimum disruption of the airport operations. Different scenarios, as described in the aerodrome emergency plan document, should be used. The exercise could be held either during the day or at night on the airport, and at different times of the year when seasonal changes may present additional challenges. Exercises may take place both on or near the aerodrome to test different scenarios.
 - (6) In order to obtain the maximum benefit from a full-scale emergency exercise, the entire proceedings should be reviewed. An observer critique team should be organised, comprised of members who are familiar with mass casualty accident proceedings. Each member of the critique team should observe the entire exercise, and complete the appropriate emergency drill critique forms. As soon as convenient after the exercise, a critique meeting should be held so members of the team can present their observations and recommendations for improvement of the airport emergency plan procedures and associated airport emergency plan document.
 - (7) The exercise should be followed by a full debriefing, critique, and analysis. It is important that representatives of all organisations which participate in the exercise actively participate in the critique.

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(b) Partial emergency exercises

- (1) The purpose of a partial exercise is to ensure the adequacy of the response to individual participating agencies and components of the plan.
- (2) Partial emergency exercises should involve, at least, one unit, such as rescue and firefighting services, or medical, or combination of several units, as appropriate.
- (3) Partial emergency exercises should ensure that any deficiencies found during the full-scale airport emergency exercise have been corrected.

(c) Tabletop exercises

Tabletop exercises should be held at regular intervals. The aim of these exercises should be to verify that roles and procedures are clear and understood. These exercises offer a good opportunity to test new or revised procedures, before implementation, or preparation for a full-scale emergency exercise.

GM12 ADR.OPS.B.005 Aerodrome emergency planning

DISABLED AIRCRAFT REMOVAL

- (a) The aerodrome operator should establish a plan for the removal of an aircraft disabled on, or adjacent to, the movement area, and a coordinator designated to implement the plan, when necessary.
- (b) The disabled aircraft removal plan should be based on the characteristics of the aircraft that may normally be expected to operate at the aerodrome, and include among other things:
 - (1) a list of equipment and personnel on, or in the vicinity of, the aerodrome which would be available for such purpose; and
 - (2) arrangements for the rapid receipt of aircraft recovery equipment kits available from other aerodromes;

AMC1 ADR.OPS.B.010 Rescue and fire fighting services

COMMUNICATION AND ALERTING SYSTEMS

The aerodrome operator should ensure that:

- (a) a discrete communication system is provided linking a fire station with the control tower, any other fire station on the aerodrome, and the rescue and firefighting vehicles;
- (b) an alerting system for rescue and firefighting personnel, capable of being operated from that station, is provided at the fire station, any other fire station on the aerodrome, and the aerodrome control tower;
- (c) communication means are provided for direct communication between the rescue and firefighting service and the flight crew of an aircraft in emergency;
- (d) communication means are provided to ensure the immediate summoning of designated personnel not on standby duty;

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- (e) communication means are provided to ensure two-way communication with the rescue and firefighting vehicles in attendance at an aircraft accident or incident.
- (f) communications during emergencies should be recorded;
- (g) communication means are provided between rescue and firefighting crew members; and
- (h) a system for monitoring the movement area for incidents is provided.

AMC2 ADR.OPS.B.010 Rescue and fire-fighting services

RFFS LEVEL OF PROTECTION

- (a) The aerodrome operator should ensure that:
 - (1) the level of protection normally available at an aerodrome is determined and expressed in terms of the category of the rescue and firefighting services (RFF aerodrome category) as described in (2), (3), and (4) below and in accordance with the types, amounts, and discharge rates of extinguishing agents normally available at the aerodrome; and
 - (2) the RFF aerodrome category is determined according to the Table 1, based on the longest aeroplanes normally using the aerodrome and their fuselage width. If, after selecting the category appropriate to the longest aeroplane's overall length, that aeroplane's fuselage width is greater than the maximum width in Table 1, column 3, for that category, then the category for that aeroplane should actually be one category higher.

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Aerodrome category for rescue and fire fighting		
Aerodrome Category (1)	Aeroplane overall length (2)	Maximum fuselage width (3)
1	0 m up to but not including 9 m	2 m
2	9 m up to but not including 12 m	2 m
3	12 m up to but not including 18 m	3 m
4	18 m up to but not including 24 m	4 m
5	24 m up to but not including 28 m	4 m
6	28 m up to but not including 39 m	5 m
7	39 m up to but not including 49 m	5 m
8	49 m up to but not including 61 m	7 m
9	61 m up to but not including 76 m	7 m
10	76 m up to but not including 90 m	8 m

Table 1

- (b) The aerodrome operator should ensure that during anticipated periods of reduced activity, the level of protection available is no less than that needed for the highest category of aeroplane planned to use the aerodrome during that time, irrespective of the number of movements.

AMC3 ADR.OPS.B.010 Rescue and fire fighting services

NUMBER OF RFFS VEHICLES AND RESCUE EQUIPMENT

- (a) The aerodrome operator should ensure that:
- (1) the minimum number of rescue and firefighting vehicles at the aerodrome will be in accordance with the following table; and

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Aerodrome category	Rescue and firefighting vehicles
1	1
2	1
3	1
4	1
5	1
6	2
7	2
8	3
9	3
10	3

Table 1

- (2) rescue equipment commensurate with the level of aircraft operations is provided on the rescue and firefighting vehicles.
- (b) If the aerodrome is located near a water/swampy area, or other difficult environment, or a significant portion of the approach/departure operations takes over these areas, the aerodrome operator should coordinate the availability of suitable rescue equipment and services.

AMC4 ADR.OPS.B.010 Rescue and fire fighting services

EXTINGUISHING AGENTS

The aerodrome operator should ensure that:

- (a) both principal and complementary extinguishing agents are provided at the aerodrome;
- (b) principal extinguishing agent includes:
- (1) a foam meeting the minimum performance level A; or
 - (2) a foam meeting the minimum performance level B; or
 - (3) a combination of these agents;

except for aerodromes in categories 1 to 3, where it should preferably meet the minimum performance level B;

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- (c) the complementary extinguishing agent is a dry chemical powder suitable for extinguishing hydrocarbon fires, or any other alternate agent having equivalent firefighting capability;
- (d) the amounts of water for foam production, and of the complementary agents provided on the rescue and firefighting vehicles are in accordance with the determined aerodrome category and Table 1,

Aerodrome category (1)	Foam meeting performance level A		Foam meeting performance level B		Complementary agents	
	Water (L) (2)	Discharge rate foam solution/minute (L) (3)	Water (L) (4)	Discharge rate foam solution/minute (L) (5)	Dry chemical powders (kg) (8)	Discharge Rate (kg/sec) (9)
1	350	350	230	230	45	2.25
2	1 000	800	670	550	90	2.25
3	1 800	1 300	1 200	900	135	2.25
4	3 600	2 600	2 400	1800	135	2.25
5	8 100	4 500	5 400	3 000	180	2.25
6	11 800	6 000	7 900	4 000	225	2.25
7	18 200	7 900	12 100	5 300	225	2.25
8	27 300	10 800	18 200	7 200	450	4.5
9	36 400	13 500	24 300	9 000	450	4.5
10	48 200	16 600	32 300	11 200	450	4.5

Table 1

except that for aerodrome categories 1 and 2, up to 100 % of the water may be replaced by complementary agent, or for aerodrome categories 3 to 10 when a foam meeting performance level A is used, up to 30 % of the water may be replaced by complementary agent.

For the purpose of agent substitution, 1 kg of complementary agent is equivalent if to 1 L of water for production of a foam meeting performance level A and 0.66 L of water for production of a foam meeting performance level B.

Note 1: The amounts of water specified for foam production are predicated on an application rate of 8.2 L/min/m² for a foam meeting performance level A, or 5.5 L/min/m² for a foam meeting performance level B.

Note 2: When any other complementary agent is used, the substitution ratios need to be checked.

- (e) the amount of foam concentrate provided on a vehicle should be sufficient to produce, at least, two loads of foam solution;

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- (f) when different performance level foams are provided at an aerodrome, the conversion ratio should be calculated, documented for each rescue and firefighting vehicle and applied to the overall rescue and firefighting requirement;
- (g) the discharge rate of the foam solution is not less than the rates shown in Table 3;
- (h) the complementary agents comply with the appropriate specifications of the International Organisation for Standardisation (ISO);
- (i) the discharge rate of complementary agents is not less than the values shown in Table 1;
- (j) a reserve supply of foam concentrate and complementary agent, equivalent to 200 % of the quantities of these agents to be provided in the rescue and fire fighting vehicles, is maintained on the aerodrome for vehicle replenishment purposes. Where a major delay in the replenishment of this supply is anticipated, the amount of reserve supply should be increased;
- (k) a water need analysis is conducted to determine the availability of sufficient quantities of water for fire fighting;
- (l) quantities of water are recalculated and the amount of water for foam production and the discharge rates for foam solution are increased accordingly, where operations by aeroplanes larger than the average size in a given category are planned; and
- (m) arrangements are in place to manage extinguishing agents in terms of selection, storage, maintenance, and testing.

AMC5 ADR.OPS.B.010 Rescue and fire fighting services

RESPONSE TIME

The aerodrome operator should ensure that:

- (a) rescue and firefighting service achieves a response time not exceeding three minutes with an operational objective of not exceeding two minutes, to any point of each operational runway, in optimum visibility and surface conditions, and be in a position to apply foam at a rate of, at least, 50 % of the discharge rate specified in AMC4 ADR.OPS.B.010 Table 3;
- (b) response times to any other part of the movement area, in optimum visibility and surface conditions, are calculated and included in the Aerodrome Emergency Plan;
- (c) any vehicle, other than the first responding vehicle(s), required to achieve continuous agent application of the amount of extinguishing agents specified in Table 1 of AMC4 ADR.OPS.B.010 arrives one minute after the first responding vehicle(s); and
- (d) suitable guidance, equipment and/or procedures for rescue and firefighting services are provided, to meet the operational objective, as nearly as possible, in less than optimum conditions of visibility, especially during low visibility operations.

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AMC6 ADR.OPS.B.010 Rescue and fire fighting services

PERSONNEL

The aerodrome operator should ensure that:

- (a) during flight operations and, at least, 15 minutes after the departure of last flight, sufficient trained personnel is detailed and readily available to ride the rescue and firefighting vehicles, and to operate the equipment at maximum capacity;
- (b) personnel is deployed in a way that ensures the minimum response times can be achieved, and continuous agent application at the appropriate rate can be fully maintained considering also the use of hand lines, ladders, and other rescue and firefighting equipment normally associated with aircraft rescue and firefighting operations;
- (c) all responding rescue and firefighting personnel are provided with protective clothing and respiratory equipment to enable them to perform their duties in an effective manner; and
- (d) any other duties carried out by rescue and firefighting personnel do not compromise the response, or their safety.

AMC7 ADR.OPS.B.010 Rescue and fire fighting services

TRAINING OF RFFS PERSONNEL

The aerodrome operator should ensure that:

- (a) the rescue and firefighting personnel are properly trained to perform their duties in an efficient manner, and actively participate in live fire drills commensurate with the types of aircraft, and type of rescue and firefighting equipment in use at the aerodrome, including pressure-fed fuel fires drills; and
- (b) the rescue and firefighting personnel training programme includes training in human performance, including team coordination.

AMC8 ADR.OPS.B.010 Rescue and fire fighting services

MEDICAL STANDARDS FOR RFFS PERSONNEL

The aerodrome operator should ensure that appropriate medical standards are met by RFFS personnel.

GM1 ADR.OPS.B.010 Rescue and fire fighting services

AVAILABILITY AND SCOPE OF RESCUE AND FIRE FIGHTING SERVICES

Public or private organisations, suitably located and equipped, could be designated to provide the rescue and firefighting service. The fire station housing these organisations should normally be located on the aerodrome, although an off-aerodrome location is not precluded, provided that the response time can be met. The scope of the rescue and fire fighting services is to save lives in the event of an aircraft accident or incident occurring at, or in the immediate

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surroundings of, the aerodrome. The operational objective is to create and maintain survivable conditions, to provide egress routes for occupants, and to initiate the rescue of those occupants unable to make their escape without direct aid.

GM2 ADR.OPS.B.010 Rescue and fire fighting services

NUMBER OF RFFS PERSONNEL

In determining the number of personnel required to provide for rescue and fire fighting, a Task and Resource Analysis should be performed, taking into consideration the types of aircraft operating at the aerodrome, the available rescue and fire fighting vehicles and equipment, any other duties required from RFFS personnel, etc.

GM3 ADR.OPS.B.010 Rescue and fire fighting services

TRAINING OF RESCUE AND FIRE FIGHTING PERSONNEL

The training of rescue and firefighting personnel may include initial and recurrent training in, at least, the following areas:

- (a) airport familiarisation;
- (b) aircraft familiarisation;
- (c) rescue and firefighting personnel safety;
- (d) emergency communications systems on the aerodrome, including aircraft fire-related alarms;
- (e) use of the fire hoses, nozzles, turrets, and other appliances;
- (f) application of the types of extinguishing agents required;
- (g) emergency aircraft evacuation assistance;
- (h) firefighting operations;
- (i) adaptation and use of structural rescue and firefighting equipment for aircraft rescue and firefighting;
- (j) dangerous goods;
- (k) familiarisation with fire fighters' duties under the aerodrome emergency plan;
- (l) low visibility procedures;
- (m) human performance, including team coordination;
- (n) protective clothing and respiratory protection;
- (o) composite materials; and
- (p) recognition of aircraft ballistic parachute systems during emergency operations.

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INSTALLATIONS (ADR.OPS.B)**GM4 ADR.OPS.B.010 Rescue and firefighting services**

NUMBER OF RFFS VEHICLES AND RESCUE EQUIPMENT

Special fire fighting equipment may not be provided for water areas; this does not prevent the provision of such equipment if it would be of practical use, such as when the areas concerned include reefs or islands. The objective should be to plan and deploy the necessary life-saving flotation equipment, as expeditiously as possible, in a number commensurate with the largest aeroplane normally using the aerodrome.

GM5 ADR.OPS.B.010 Rescue and fire fighting services**REDUCTION OF RFFS AERODROME CATEGORY**

- (a) The level of protection could be one category below the determined category if the number of movements of the aeroplanes in the highest RFF aerodrome category normally using the aerodrome is less than 700 in the busiest consecutive three months.
- (b) The level of protection should be equal to the determined category if the number of movements of the aeroplanes in the highest RFF aerodrome category normally using the aerodrome is equal or above 700 in the busiest consecutive three months.
- (c) For aerodromes serving exclusively all-cargo aircraft operations, the RFF aerodrome category could be adjusted to a category lower than the one for passenger aircraft operations, provided that the principal objective, to save lives in the event of an aircraft accident or incident, is met and such reduction is approved by the Competent Authority.
- (d) Unforeseen circumstances leading to temporary reduction of the level of protection of the aerodrome rescue and fire fighting services are considered any unplanned events that lead to unavailability of facilities, equipment, and resources, such as:
 - (1) breakdown of RFFS vehicles;
 - (2) staff shortage;
 - (3) unavailability of extinguishing agents;
 - (4) RFFS response to an accident;
 - (5) Etc.

AMC1 ADR.OPS.B.015 Monitoring and Inspection of movement area and related facilities

GENERAL

- (a) The aerodrome operator should establish a monitoring and inspection program of the movement area which is commensurate with the traffic expected at the aerodrome in order to identify any default or potential hazards to the safety of aircraft or aerodrome operations.
- (b) Inspections of the movement area covering items such as the presence of FOD, the status of visual aids, wildlife and current surface conditions, should be carried out each

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day, at least, once where the code number is 1 or 2, and, at least, twice where the code number is 3 or 4.

- (c) Inspections covering other items such as other lighting systems required for the safety of aerodrome operations, pavements and adjacent ground surfaces, drainage and storm water collection systems, fencing and other access control devices, the movement area environment inside the aerodrome boundary and outside the aerodrome boundary within line of sight, should be carried out, at least, weekly.
- (d) The aerodrome operator, during excessive weather events (excessive heat, freeze and thaw periods, following a significant storm, etc.) should be conducting extra inspections of paved areas to check for pavement blow-ups and debris that could damage aircraft, or cause pilots to lose directional control.
- (e) The aerodrome operator should keep a log for all routine and non-routine inspections of the movement area and related facilities.

AMC2 ADR.OPS.B.015 Monitoring and inspection of movement area and related facilities

PERSONNEL REQUIREMENTS FOR MOVEMENT AREA INSPECTIONS

- (a) The aerodrome operator should designate the personnel responsible for carrying out movement area inspections.
- (b) The aerodrome operator should ensure that personnel conducting movement area inspections receive training in, at least, the following areas:
 - (1) aerodrome familiarisation, including aerodrome markings, signs, and lighting;
 - (2) Aerodrome Manual;
 - (3) Aerodrome Emergency Plan;
 - (4) Notice to Airmen (NOTAM) notification procedures;
 - (5) aerodrome driving rules;
 - (6) procedures of radiotelephony;
 - (7) aerodrome inspection procedures and techniques; and
 - (8) procedures for reporting inspection results and observations;

GM1 ADR.OPS.B.015 Monitoring and inspection of movement area and related facilities

PAVEMENTS AND ADJACENT GROUND SURFACES INSPECTION

- (a) Paved Areas Inspection

The following should be observed during an inspection of paved areas:

- (1) general cleanliness with particular attention to material which could cause engine ingestion damage. This may include debris from runway maintenance operations, or excessive grit remaining after runway gritting;

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- (2) presence of contaminants such as snow, slush, ice, wet ice, wet snow on ice or frost, water, anti-icing or de-icing chemicals, mud, dust, sand, volcanic ash, oil, rubber deposits which may impair the runway surface friction characteristics; particular attention should be given to the simultaneous presence of snow, slush, ice, wet ice, wet snow on ice with anti-icing or de-icing chemicals;
 - (3) signs of damage to the pavement surface including cracking and spall of concrete, condition of joint sealing, cracking and looseness of aggregate in asphalt surfaces, or break-up of friction courses;
 - (4) after rain, flooded areas should be identified and marked, if possible, to facilitate later resurfacing;
 - (5) damage of light fittings;
 - (6) cleanliness of runway markings;
 - (7) the condition and fit of pit covers; and
 - (8) the extremities of the runway should be inspected for early touchdown marks; blast damage to approach lights, marker cones and threshold lights; cleanliness and obstacles in the runway end safety area.
- (b) Adjacent ground surfaces inspection

The following may be observed during the inspection:

- (1) the general state of ground cover vegetation ensuring, in particular, that excessive length is not obscuring lights, signs, markers, etc.;
- (2) any developing depressions should be noted and plotted;
- (3) any unreported aircraft wheel tracks should be carefully plotted and reported;
- (4) the condition of signs and markers;
- (5) the general bearing strength of grass areas, particularly those close to aircraft pavement surface;
- (6) waterlogged grass areas; and
- (7) FOD and wildlife.

GM2 ADR.OPS.B.015 Monitoring and inspection of movement area and related facilities

VISUAL AIDS INSPECTION

- (a) Flight checks of visual aids

Flight checks of approach and runway lighting systems should be carried out to ensure the pattern is correct and the lights are working, whenever a new system is commissioned, or after a major maintenance, and at least annually. The opportunity should also be taken to identify any confusing, or misleading lights in the vicinity of the aerodrome.

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(b) Ground checks of visual aids

Photometric testing of runway lighting and approach lighting that is accessible with the equipment to be used, should be carried out in a targeted manner aimed at maintaining high levels of serviceability. The regularity of testing should be adjusted to achieve the target level of serviceability applicable to the service being tested.

GM3 ADR.OPS.B.015 Monitoring and inspection of movement area and related facilities

OBSTACLES

- (a) All authorised obstacles should be checked for proper lighting and marking.
- (b) Any unauthorised obstacles should be reported to the designated persons or organisations immediately.

GM4 ADR.OPS.B.015 Monitoring and inspection of movement area and related facilities

INSPECTION LOG

The inspection log should include:

- (a) details of inspection intervals and times;
- (b) names of persons carrying out the inspection; and
- (c) results and observations if any.

GM5 ADR.OPS.B.015 Monitoring and inspection of movement area and related facilities

FOLLOW-UP OF INSPECTIONS

Arrangements should exist for reporting the results of inspections, and for taking prompt follow-up actions to ensure correction of unsafe conditions. These arrangements could include, depending on the result or observation, notification to air traffic services and aeronautical information services, removal of FODs, wildlife control, recording of events for further analysis according to the aerodrome operator's SMS requirements, etc.

GM6 ADR.OPS.B.015 Monitoring and inspection of movement area and related facilities

- (a) PERSONNEL REQUIREMENTS FOR MOVEMENT AREA INSPECTIONS Inspectors should use checklists covering the various inspection areas. A sketch of the aerodrome should accompany the checklist so that the location of problems can be marked for easy identification.

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- (b) Inspectors should review the most recently completed checklist from the previous inspection cycle prior to beginning the inspection.
- (c) If construction or works are in progress, inspectors should be familiar with the safety plan of the construction or works.

AMC1 ADR.OPS.B.020 Wildlife strike hazard reduction

GENERAL

The aerodrome operator should:

- (a) participate in the national wildlife strike hazard reduction programme;
- (b) establish procedures to record and report to the appropriate authority wildlife strikes to aircraft occurred at the aerodrome, in close cooperation with organisations operating, or providing services at the aerodrome;
- (c) ensure that wildlife hazard assessments are made by competent personnel; and
- (d) establish, implement and maintain a wildlife risk management programme.

GM1 ADR.OPS.B.020 Wildlife strike hazard reduction

WILDLIFE RISK ASSESSMENT

- (a) The aerodrome operator should:
 - (1) conduct a risk assessment using strike data for each species, as well as information on the presence of species, the number of individuals, and their biology, and update this regularly;
 - (2) take into account the number of strikes for each species and the severity of damage arising from those strikes; and
 - (3) target actions on those species which are present with the highest frequency and create the greatest damage.
- (b) Wildlife risk assessments should be made by qualified personnel.

GM2 ADR.OPS.B.020 Wildlife strike hazard reduction

WILDLIFE RISK MANAGEMENT PROGRAM

The wildlife risk management program may cover an area of approximately 13 km (7 NM) from the aerodrome reference point, and should include, at least, the following elements:

- (a) assignment of personnel:
 - (1) a person who is accountable for developing and implementing the wildlife risk programme;

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- (2) a person who oversees the daily wildlife control activities, and analyses the collected data and carries out risk assessments in order to develop and implement the wildlife risk management programme; and
- (3) trained and qualified staff who detect and record the birds/wildlife, and assess the bird/wildlife hazard, and expel hazardous birds/wildlife;
- (b) a process to report, collect, and record data of struck and living birds/wildlife;
- (c) a process to analyse the data and to assess the bird/wildlife hazard to develop mitigation, proactive, and reactive measures. This should include a risk assessment methodology;
- (d) a process of habitat and land management both on, and in its surroundings, whenever possible, in order to reduce the attractiveness of the area to birds/wildlife;
- (e) a process to remove hazardous birds/wildlife;
- (f) a process for liaison with non-airport agencies and local landowners, etc. to ensure the airport is aware of developments that may contribute to creating additional bird hazards within the airport vicinity's infrastructure, vegetation, land use and activities (for example crop harvesting, seed planting, ploughing, establishment of land or water features, hunting, etc. that might attract birds/wildlife).

GM3 ADR.OPS.B.020 Wildlife strike hazard reduction

TRAINING FOR WILDLIFE CONTROL

- (a) The aerodrome wildlife control personnel should receive formal training prior to their initial engagement as wildlife controllers.
- (b) Training for aerodrome wildlife control should be documented and records of it should be retained to satisfy periodic reviews, audits, and competence checks;
- (c) Training of airport wildlife control personnel should be conducted by qualified aerodrome wildlife control personnel, or specialists with proven experience in this field.
- (d) Wildlife control initial training should, at least, address the following general areas:
 - (1) an understanding of the nature and extent of the aviation wildlife management problem, and local hazard identification;
 - (2) an understanding of the national and local regulations, standards, and guidance material related to airport wildlife management programs (use of best-practice models);
 - (3) appreciation of the local wildlife ecology and biology, including (where applicable) the importance of good airfield grass management policies, and the benefits they can deliver to wildlife control;
 - (4) the importance of accurate wildlife identification and observations, including the use of field guides;

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- (5) local and national laws and regulations relating to rare and endangered species, and species of special concern, and the aerodrome operators policies relating to them;
 - (6) wildlife strike remains collection, and identification policies and procedures;
 - (7) long-term (passive) control measures, including on and off airport habitat management, including identification of wildlife attractions, vegetation policies, air navigation aids protection, and drainage system, and water body management practicalities;
 - (8) short-term (active) tactical measures, using well established effective wildlife removal, dispersal, and control techniques;
 - (9) documentation of wildlife activities and control measures, and reporting procedures (the aerodrome wildlife management plan);
 - (10) firearms and field safety, including the use of personal protective equipment; and
 - (11) wildlife strike risk assessment and risk management principles, and how these programs integrate with the aerodrome's safety management system.
- (e) Wildlife control staff should be fully aware of the conditions and terms of the operations of the aerodrome environment. Where this is not relevant, the wildlife control personnel should receive appropriate training, including:
- (1) aerodrome airside driver training, including aerodrome familiarisation, air traffic control communications, signs and marking, navigational aids, aerodrome operations, and safety and other matters the aerodrome operator deems appropriate; and
 - (2) aircraft familiarisation, including aircraft identification, aircraft engine design, and impact of wildlife strikes on aircraft systems.
- (f) It should be ensured that wildlife control staff maintains competence in the role. This could be achieved either by regular refresher training or another system of monitoring, acceptable to the appropriate authority. The maintenance of competence should include the areas in (d) and (e) above, and also include:
- (1) reviewing firearms safety;
 - (2) changes in the local environment;
 - (3) changes in risk management policy;
 - (4) recent wildlife events at the aerodrome;
 - (5) improvements in active and passive measures; and
 - (6) any other matters the airport operator deems appropriate.

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GM4 ADR.OPS.B.020 Wildlife strike hazard reduction

RECORDING AND REPORTING OF WILDLIFE STRIKES AND OBSERVED WILDLIFE

- (a) It is necessary to maintain a record of all wildlife activity or 'bird/wildlife log'. The log should include, at least, the following information:
 - (1) numbers, species, and location of birds/wildlife seen; and
 - (2) actions taken to disperse birds/wildlife, and the results of these actions.
- (b) The log should be completed at regular intervals by the wildlife control staff.
- (c) The log should be analysed to identify which species represent a hazard, at which times of day or year, or under which weather conditions, etc.
- (d) The aerodrome operator should have a system in place to collect bird/wildlife strike reports in close cooperation with data owners, like aircraft operators, air navigation service providers, aircraft engine maintenance departments, etc.

AMC1 OPS.B.025 Operation of vehicles

TRAINING PROGRAMME

- (a) Depending upon the scale and complexity of the aerodrome and the individual requirements of the driver, the training programme should take into account the following main areas:
 - (1) a generic airside vehicle driver training programme which covers operational safety of operating vehicles and equipment in close proximity to aircraft on the movement, such as runways, taxiways, aprons, stands, airside roads, and areas adjacent to the movement area;
 - (2) specific training on the vehicle or equipment, e.g. car, tug, high loader, coach;
 - (3) additional training on the hazards associated with runways and taxiways, and in the correct use of RTF and standard phraseology should be received by drivers required to operate on the manoeuvring area.
- (b) An aerodrome operator should establish a system for issuing movement area driving authorisations, and the conditions of their renewal.

AMC2 ADR.OPS.B.025 Operation of vehicles

MOVEMENT AREA DRIVING TRAINING

The training for driving on the movement area should include the following:

- (a) the geography of the aerodrome;
- (b) aerodrome signs, markings and lights; and

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- (c) radiotelephone operating procedures if the duties require to drive on the manoeuvring area;
- (d) terms and phrases used in aerodrome control, including the ICAO spelling alphabet, if the duties require interaction with aerodrome control;
- (e) rules of air traffic services as they relate to ground operations;
- (f) airport rules and procedures;
- (g) low visibility procedures; and
- (h) specialist functions as required, for example, in rescue and firefighting.

GM1 ADR.OPS.B.025 Operation of vehicles

GRANT, SUSPENSION OR REVOCATION OF AN AIRSIDE DRIVING AUTHORISATION

- (a) The aerodrome operator should grant an airside driving authorisation to persons provided that:
 - (1) their tasks involve driving on the movement area;
 - (2) they hold a State driving license or any other driving license recognised by the State;
 - (3) they hold a special State driving license if their duties involve the operation of a specialised vehicle;
 - (4) they meet the medical criteria according to the National Legislation;
 - (5) they hold a State Radiotelephony Operating License, or have a specific training on radiotelephony if their duties involve driving on the manoeuvring area;
 - (6) they have successfully completed an airside driving theoretical course, and passed the written exams;
 - (7) they have successfully demonstrated competency, as appropriate, in:
 - (i) the operation, or use of vehicle transmit/receive equipment;
 - (ii) understanding and complying with air traffic control and local procedures;
 - (iii) vehicle navigation on the aerodrome; and
 - (iv) special skills required for the particular function.
- (b) The airside driving authorisation should be valid for a limited period of time, and renewed thereafter, provided that the driver has successfully completed a refresher training course, and meets the requirements (a)(1)–(a)(4) above;
- (c) The aerodrome operator could suspend or revoke an airside driving authorisation when the person:
 - (1) does not fulfil the requirements stated in (a)(1)–(a)(4);
 - (2) has repeatedly been reported to violate movement area driving rules; and
 - (3) has been proved to drive under the effect of alcohol or drugs.

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- (d) It is not necessary that all operators be trained at the same level. For example, operators whose functions are restricted to the apron. For the same reason, the aerodrome operator could establish different types of driving authorisations, e.g. one class for driving at the apron, and another one for the manoeuvring area which may also have different validity periods.

GM2 ADR.OPS.B.025 Operation of vehicles

DEVELOPMENT OF A FRAMEWORK FOR A VEHICLE DRIVER TRAINING PROGRAMME

AIRSIDE VEHICLE DRIVER

The following elements could be considered when developing programs and knowledge requirements for an airside vehicle driver training programme:

- (a) Airside driving permit (ADP)
- (1) the issuing authority, the validity of the permit in terms of time, conditions of use, and its transferability;
 - (2) ownership of the permit and control, and audit of permit issue;
 - (3) local enforcement, and driving offence procedures; and
 - (4) relationship to State driver licensing system.
- (b) National legislation and regulation
- (1) government/State regulations related to general vehicle driving licenses;
 - (2) State/regional/local government requirements; and
 - (3) national aviation safety authority requirements/guidance for driving airside.
- (c) Aerodrome regulations and requirements
- (1) rules of the air, and ATC procedures applicable to aerodromes as they relate to vehicles, particularly rights of way;
 - (2) specific aerodrome regulations, requirements, and local instructions;
 - (3) local methods used to disseminate general information, and instructions to drivers; and
 - (4) local methods used to disseminate information regarding works in progress.
- (d) Personal responsibilities
- (1) agreed national or airport requirements concerning fitness to drive (medical and health standards);
 - (2) issue and use of personal protective equipment, such as high visibility clothing and hearing protection;
 - (3) general driving standards;
 - (4) no-smoking/no-drinking requirements airside;
 - (5) responsibilities with respect to foreign object debris and fuel/oil spillage; and
 - (6) the responsibility to ensure that a vehicle is suitable for the task, and is used correctly.

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- (e) Vehicle standards
 - (1) condition and maintenance standards agreed at the aerodrome, and/or national level;
 - (2) the requirement to display obstruction lights and company insignia;
 - (3) the requirement for, and content of, daily vehicle inspections;
 - (4) agreed standards of aerodrome and company vehicle fault reporting and rectification; and
 - (5) local requirements for the issue and display of airside vehicle permits.
- (f) General aerodrome layout
 - (1) the general geography of the local aerodrome;
 - (2) aviation terminology used such as runway, taxiway, apron, roads, crossings, runway-holding points;
 - (3) all aerodrome signs, markings and lighting for vehicles and aircraft;
 - (4) specific reference to signs, markings and lighting used to guard runways, and critical areas; and
 - (5) specific reference to any controlled/uncontrolled taxiway crossing procedures.
- (g) Hazards of general airside driving
 - (1) speed limits, prohibited areas, and no parking regulations;
 - (2) the danger zones around aircraft;
 - (3) engine suction/ingestion and blast, propellers, and helicopters;
 - (4) aircraft refuelling;
 - (5) foreign object debris and spillages;
 - (6) vehicle reversing;
 - (7) staff and passengers walking across aprons;
 - (8) air bridges and other services such as fixed electrical ground power;
 - (9) the general aircraft turnaround process;
 - (10) aircraft emergency stop and fuel cut-off procedures;
 - (11) hazardous cargo;
 - (12) local vehicle towing requirements;
 - (13) requirements for driving at night; and
 - (14) requirements for driving in adverse weather conditions, particularly low visibility.
- (h) Local organisations
 - (1) the role of the aerodrome operator in setting and maintaining standards;
 - (2) the national aviation safety authority and its responsibilities;
 - (3) the national and/or local police, and their involvement with airside driving; and
 - (4) other enforcement authorities dealing with vehicles, driving, health, and safety.

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- (i) Emergency procedures
 - (1) actions and responsibilities in a crisis situation (any accident or significant incident occurring on the airport);
 - (2) action in the event of a vehicle accident;
 - (3) specific action in the event of a vehicle striking an aircraft;
 - (4) action in the event of fire;
 - (5) action in the event of an aircraft accident/incident; and
 - (6) action in the event of personal injury.
- (j) Communications
 - (1) radio procedures and phraseologies to be used if applicable;
 - (2) light signals used by ATC;
 - (3) procedures to be used by vehicle drivers if lost or unsure of position;
 - (4) local emergency telephone numbers; and
 - (5) how to contact the local aerodrome safety unit.
- (k) Practical training (visual familiarisation)
 - (1) airside service roads, taxiway crossings, and any restrictions during low visibility;
 - (2) aprons and stands;
 - (3) surface paint markings for vehicles and aircraft;
 - (4) surface paint markings that delineate the boundary between aprons and taxiways;
 - (5) signs, markings and lighting used on the taxiway that indicate the runways ahead;
 - (6) parking areas and restrictions;
 - (7) speed limits and regulations; and
 - (8) hazards during aircraft turnarounds and aircraft movements.

MANOEUVRING AREA VEHICLE DRIVER

- (a) All drivers expected to operate on the manoeuvring area of the aerodrome should obtain an ADP covering the programme above. Any driver expected to drive on the manoeuvring area should, also, obtain an agreed period of experience in general airside driving before training to operate on the manoeuvring area.
- (b) All drivers should be trained initially and be provided with refresher training regularly, with particular additional emphasis on the following areas:
 - (1) Aerodrome regulations and requirements
 - (i) air traffic control rules, right of way of aircraft;
 - (ii) the definition of movement areas, manoeuvring areas, aprons, stands; and
 - (iii) methods used to disseminate information regarding works in progress.
 - (2) Air traffic control
 - (i) the aerodrome control function and area of responsibility;

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- (ii) the ground movement control function and area of responsibility;
 - (iii) normal and emergency procedures used by ATC relating to aircraft;
 - (iv) ATC frequencies used and normal handover/transfer points for vehicles;
 - (v) ATC call signs, vehicle call signs, phonetic alphabet, and standard phraseology; and
 - (vi) demarcation of responsibilities between ATC and apron control if applicable.
- (3) Personal responsibilities
- (i) fitness to drive with particular emphasis on eyesight and colour perception;
 - (ii) correct use of personal protective equipment;
 - (iii) responsibilities with respect to foreign object debris; and
 - (iv) responsibilities with respect to escorting other vehicles on the manoeuvring area.
- (4) Vehicle standards
- (i) responsibility for ensuring the vehicle used is fit for the purpose and task;
 - (ii) requirements for daily inspection prior to operating on the manoeuvring area;
 - (iii) particular attention to the display of obstruction and general lights; and
 - (iv) serviceability of all essential communications systems with ATC and base operations.
- (5) Aerodrome layout
- (i) particular emphasis on signs, markings and lighting used on the manoeuvring area;
 - (ii) special emphasis on signs, markings and lighting used to protect the runway;
 - (iii) description of equipment essential to air navigation such as instrument landing systems (ILS);
 - (iv) description of protected zones related to ILS antenna;
 - (v) description of ILS protected areas, and their relation to runway-holding points;
 - (vi) description of runway instrument/visual strip, cleared and graded area; and
 - (vii) description of lighting used on the manoeuvring area with particular emphasis on those related to low visibility operations.
- (6) Hazards of manoeuvring area driving
- (i) engine suction/ingestion and blast, vortex, propellers, and helicopter operations;
 - (ii) requirements for driving at night;
 - (iii) requirements for operations in low visibility and other adverse weather conditions;
 - (iv) procedures in the event of a vehicle or radio becoming unserviceable while on the manoeuvring area; and

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- (v) right of way of aircraft, towed aircraft, and rescue and fire fighting vehicles in an emergency.
- (7) Emergency procedures
 - (i) actions to be taken in the event of a vehicle accident/incident;
 - (ii) actions to be taken in the event of an aircraft accident/incident;
 - (iii) actions to be taken if foreign object debris or other debris is found on runways and taxiways;
 - (iv) procedures to be used by vehicle drivers if lost or unsure of their position; and
 - (v) local emergency telephone numbers.
- (8) Aircraft familiarisation
 - (i) knowledge of aircraft types and ability to identify all types normally operating at the aerodrome;
 - (ii) knowledge of airline call signs; and
 - (iii) knowledge of aircraft terminology relating to engines, fuselage, control surfaces, undercarriage, lights, vents, etc.
- (9) Practical training (visual familiarisation)
 - (i) all runways (including access and exit routes), holding areas, taxiways and aprons;
 - (ii) all signs, surface markings and lighting associated with runways, holding positions, CAT I, II, and III operations;
 - (iii) all signs, surface markings and lighting associated with taxiways;
 - (iv) specific markings that demarcate the boundary between aprons and manoeuvring areas;
 - (v) navigation aids such as ILS, protected area, antenna, RVR equipment, and other meteorological equipment;
 - (vi) hazards of operating around aircraft landing, taking off or taxiing; and
 - (vii) any locally used naming convention for particular areas or routes.

RADIOTELEPHONY

All drivers of vehicles operating on the manoeuvring area should be expected to display a high degree of competence with respect to the use of RTF phraseology and ICAO language requirements for air ground radiotelephony communications. Emphasis should be placed on the following areas:

- (a) Hierarchy of message priority
Message priorities, an understanding of distress, alerting, control and information messages.
- (b) Phonetic alphabet
Correct pronunciation of letters, words, and numbers.

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- (c) Standard phraseology
 - (1) emphasis on the need for drivers to use standard phraseology; and
 - (2) the need for caution with certain phrases such as 'cleared' and 'go ahead'.
- (d) Call signs for aircraft, ATC, and vehicles
 - (1) an understanding of terminology and acronyms used by ATC and pilots;
 - (2) knowledge of the airline call signs used at the aerodrome; and
 - (3) knowledge of vehicle call signs, and that they should be appropriate to their function (e.g. 'Operations', 'Fire', 'Engineer') and numbered when more than one vehicle is used (e.g. 'Fire 2').
- (e) Read back procedures

The need for vehicle drivers to use standard readback, in the same manner as pilots, for instructions such as 'enter/cross the runway', and if conditional clearances are used.
- (f) Readability scale

Understanding and use of the readability scale from 1 to 5.
- (g) Lost or uncertain of position

Understanding of local procedures for vehicle drivers lost or uncertain of their position on the manoeuvring area.
- (h) Vehicle breakdown
 - (1) local procedure for vehicle breakdown on runways and taxiways; and
 - (2) procedure for notifying ATC of vehicle failure.
- (i) Radio failure
 - (1) understanding of the local procedure if radio failure occurs while on the runway or taxiway; and
 - (2) understanding of the light signals that can be used by ATC to pass instructions to vehicles.
- (j) Transmitting techniques and use of RTF
 - (1) understanding the reasons for listening out prior to transmitting;
 - (2) use of standard phraseology and ICAO air-ground radiotelephony communications procedures;
 - (3) words and sounds to be avoided;
 - (4) correct positioning of microphones to avoid voice distortion;
 - (5) avoidance of 'clipped' transmissions;
 - (6) awareness of regional accents and variations of speech; and
 - (7) speed of delivery of RTF phraseology.
- (k) Portable radios
 - (1) correct use of radios;
 - (2) effective range and battery life;
 - (3) screening/shielding effects on the aerodrome; and

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- (4) use of correct call signs, either related to a vehicle or a person.
- (l) Safety while using radios
 - (1) local instructions regarding the use of portable radios and hand-held microphones while driving a vehicle; and
 - (2) local instructions on the use of mobile telephones while operating airside.

GENERAL CONSIDERATIONS

- (a) All three training programmes should consist of two main parts, the first being the theoretical part which should include the use of prepared presentations, maps, diagrams, videos, booklets and checklists as appropriate. The second part should involve practical training and visual familiarisation on the aerodrome with a suitably trained person. This practical tuition will take time depending upon the complexity of the aerodrome.
- (b) Where the responsibility for vehicle driver training (apron and manoeuvring area) and RTF training is delegated to a third-party provider, the aerodrome management should institute a programme of audits, as part of its safety management system, to ensure that agreed standards are being maintained.
- (c) The framework for a vehicle driver training programme outlined above is intended only as a guide, and is based on current 'good practice'. It is incumbent on aerodrome operators to regularly review their vehicle driver training programmes against programmes and documentation available across the industry.

AMC1 ADR.OPS.B.030 Surface movement guidance and control system

GENERAL

- (a) The aerodrome operator should develop a surface movement guidance and control system taking into account:
 - (1) the density of air traffic;
 - (2) the visibility conditions under which operations are intended;
 - (3) the need for pilot orientation;
 - (4) the complexity of the aerodrome layout; and
 - (5) movements of vehicles.
- (b) The surface movement guidance and control system should be designed to assist in the prevention of inadvertent incursions of aircraft and vehicles onto an active runway;
- (c) The system should be designed to assist in the prevention of collisions between aircraft, and between aircraft and vehicles or objects, on any part of the movement area.
- (d) Where a surface movement guidance and control system is provided by selective switching of stop bars and taxiway centre line lights, the following requirements are met:
 - (1) taxiway routes which are indicated by illuminated taxiway centre line lights should be capable of being terminated by an illuminated stop bar;

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- (2) the control circuits should be so arranged that when a stop bar located ahead of an aircraft is illuminated, the appropriate section of taxiway centre line lights beyond it is suppressed; and
 - (3) the taxiway centre line lights are activated ahead of an aircraft when the stop bar is suppressed.
- (e) The aerodrome operator should develop the surface movement guidance and control system (SMGCS) procedures in cooperation with the aerodrome air traffic services provider.

GM1 ADR.OPS.B.030 Surface movement guidance and control system

GENERAL

- (a) The SMGCS system should comprise an appropriate combination of visual aids, non-visual aids, procedures, control, regulation, management and information facilities. Systems range from the very simple at small aerodromes, with light traffic operating in good visibility conditions, to the complex systems necessary at large aerodromes with heavy traffic operating in low visibility conditions. The system selected for an aerodrome will be appropriate to the operational environment in which that aerodrome will operate.
- (b) Surface movement radar for the manoeuvring area could be provided at an aerodrome intended for use in runway visual range conditions less than a value of 350 m.
- (c) Surface movement radar for the manoeuvring area could be provided at an aerodrome other than that in (b) above when traffic density and operating conditions are such that regularity of traffic flow cannot be maintained by alternative procedures and facilities.

AMC1 ADR.OPS.B.035 Operations in winter conditions

GENERAL

- (a) The aerodrome operator should prepare, in collaboration with air traffic services provider and other relevant parties, procedures for winter maintenance (snow plan). The procedures should include requirements for inspections, criteria for snow-clearing, priorities for snow-clearing, criteria for preparation of operational surfaces, requirements for marking of snow-covered operational surfaces, and methods for assessing and reporting the surface conditions. The criteria specified in the winter maintenance procedures should be minimum criteria for maintaining safe aerodrome operations, including criteria for suspension of runway operation.
- (b) The aerodrome operator should ensure that snow, slush, ice, standing water, and other contaminants are removed from the surface of a paved runway, as rapidly and completely as possible, to minimise accumulation.
- (c) The aerodrome operator, whenever possible, should avoid using chemicals which may have harmful effects on aircraft or pavements.

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GM1 ADR.OPS.B.035 Operations in winter conditions

AERODROME SNOW PLAN

- (a) The aerodrome snow plan should be published and made available to all concerned in snow clearance.
- (b) Details of the equipment available at the aerodrome should be published in the Aeronautical Information Publication (AIP).
- (c) The aerodrome snow plan should include the following:
 - (1) the Snow Committee members and the person in charge of the snow clearance operation, with a chain of command giving a breakdown in duties;
 - (2) methods of communication between aerodrome operations, air traffic control, and the Meteorological Office;
 - (3) the equipment available for snow clearance. This should include equipment for ploughing, sweeping, and blowing snow;
 - (4) priority of surfaces to be cleared, and clearance limits for aircraft using the aerodrome;
 - (5) collection of information for SNOWTAM and dissemination of this information;
 - (6) designated snow dumping or melting areas to avoid confusion during the actual clearance operations;
 - (7) an alerting system in order that sufficient warning is given to all bodies concerned;
 - (8) the manpower available, including staff for equipment maintenance arrangements for shifts, and call out procedures;
 - (9) deployment of equipment and tactical approaches to be used;
 - (10) general principles to be followed in deciding when to close runways for snow clearance and designation of management personnel authorised to make the decision;
 - (11) methods of assessing and reporting the surface conditions; and
 - (12) criteria for the suspension of runway operations.

AMC1 ADR.OPS.B.040 Night Operations

GENERAL

The aerodrome operator for aerodromes operated at night should, in collaboration with air traffic services provider, ensure that visual aids are installed, operated, and maintained to permit aircraft operations to be performed safely.

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SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B)**AMC1 ADR.OPS.B.045 Low Visibility Operations**

GENERAL

- (a) The aerodrome operator should, in collaboration with air traffic services provider and the provider of apron management services, if applicable, establish procedures for low visibility operations if movement of aircraft is permitted when the RVR is less than 550 m.
- (b) When low visibility procedures (LVP) are in effect, the aerodrome operator should make available to aeronautical information services and/or air traffic services, as appropriate, information on the status of the aerodrome facilities.
- (c) The aerodrome operator should establish and implement procedures to ensure that when low visibility procedures (LVP) are in effect, persons and vehicles operating on an apron are restricted to the essential minimum.
- (d) The procedures to be established by the aerodrome operator to ensure safe aerodrome operations during low visibility conditions should cover the following subjects:
 - (1) physical characteristics of the runway environment, including pre-threshold, approach and departure areas;
 - (2) obstacle limitation surfaces;
 - (3) surveillance and maintenance of visual aids;
 - (4) safeguarding of non-visual aids essential to low visibility procedures;
 - (5) secondary power supplies;
 - (6) movement area safety;
 - (7) RFFS.

AMC1 ADR.OPS.B.050 Operations in adverse weather conditions

PROCEDURES

The aerodrome operator should, together with the air traffic services and other relevant parties operating at the aerodrome, establish and implement procedures required to mitigate the risk of operation of the aerodrome under adverse weather conditions such as strong winds, heavy rain, and thunderstorms, including the suspension of operations on the runway(s) if deemed necessary.

AMC1 ADR.OPS.B.055 Fuel quality

GENERAL

The aerodrome operator should verify, either by itself or through formal arrangements with third parties, that organisations involved in storing and dispensing of fuel to aircraft, implement procedures to:

- (a) maintain the installations and equipment for storing and dispensing the fuel in such condition so as not to render unfit for use in aircraft;

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- (b) mark such installations and equipment in a manner appropriate to the grade of the fuel;
- (c) take fuel samples at appropriate stages during the storing and dispensing of fuel to aircraft, and maintain records of such samples; and
- (d) use adequately qualified and trained staff in storing, dispensing, and otherwise handling fuel on the aerodrome.

GM1 ADR.OPS.B.055 Fuel quality

COMPLIANCE

The aerodrome operator, in order to ensure compliance, could use:

- (a) audit reports to organisations involved in storing and dispensing of fuel to aircraft, or
- (b) relevant national procedures providing for the assurance of fuel quality.

AMC1 ADR.OPS.B.060 Access to the movement area

GENERAL

The aerodrome operator should:

- (a) Establish a system for issuing movement area access authorisations and the conditions of their renewal;
- (b) Define the training syllabus for persons operating at the apron, and on the movement area or other operational areas appropriate to the functions performed;

GM1 ADR.OPS.B.060 Access to the movement area

GENERAL

- (a) Access to the movement area may be granted to persons, provided that:
 - (1) their duties require access to the movement area; and
 - (2) they have successfully completed a movement area safety training course.
- (b) Access authorisations to persons may be renewed provided that:
 - (1) their duties require access to the movement area; and
 - (2) they have successfully completed a refresher movement area safety training course.
- (c) The movement area safety training should include the following:
 - (1) aerodrome familiarisation;
 - (2) privileges of the access authorisations;
 - (3) apron markings and signs;
 - (4) safety measures; and

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- (5) emergency procedures.
- (d) Access authorisations to persons may be suspended or revoked when:
 - (1) their duties do not require access to the movement area anymore; or
 - (2) they change employer; or
 - (3) they have repeatedly violated the privileges of the access authorisations; or
 - (4) they have repeatedly violated the safety rules on the movement area.
- (e) Temporary movement area access authorisations may be granted to persons for a limited period of time provided that:
 - (1) their duties require access to the movement area for a limited period of time; and
 - (2) they are escorted by persons holding movement area access authorisations.

AMC1 ADR.OPS.B.065 Visual Aids and Aerodrome Electrical Systems

GENERAL

- (a) The aerodrome operator should establish a monitoring system of aerodrome ground lights so as to automatically inform the air traffic services provider when safe operation is no longer possible.
- (b) The aerodrome operator should establish procedures for the operation of visual aids.
- (c) The aerodrome operator should establish procedures for the provision and removal of temporary markings, lights and signs.

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SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
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AMC1 ADR.OPS.B.070 Aerodrome works safety

GENERAL

- (a) The procedures should be appropriate to the volume and nature of operations at the aerodrome.
- (b) Construction or maintenance work on the movement area, or work affecting aerodrome operations should be planned, established, implemented, or approved by the aerodrome operator.
- (c) The scope of work, physical extent, and time period should be notified to concerned relevant parties. If such work will render limitations to the use of a particular runway, additional measures should be implemented to ensure safety.
- (d) Roles and responsibilities for operations and tasks associated with the reduction of runway length available and the work in progress (WIP) are clearly understood and complied with.
- (e) The aerodrome operator should put in place appropriate measures to monitor the safety of the aerodrome and aircraft operations during aerodrome works such that timely corrective action is taken when necessary to assure continued safe operations.
- (f) The aerodrome operator should ensure the works site is returned to operational use in a safe and timely manner by ensuring:
 - (1) the works site is cleared of personnel, vehicles, and plant in a safe and timely manner;
 - (2) The works-affected area is inspected for operational serviceability in accordance with the hand-back procedures; and
 - (3) relevant authorities or organisations are notified of the restoration of aerodrome serviceability in accordance with procedures, using suitable means of communication.

AMC2 ADR.OPS.B.070 Aerodrome works safety

RUNWAY PAVEMENT OVERLAYS

The aerodrome operator should ensure that:

- (a) when a runway is to be returned temporarily to an operational status before resurfacing is complete, the longitudinal slope of the temporary ramp, measured with reference to the existing runway surface or previous overlay course, should be:
 - (1) 0.5 to 1.0 % for overlays up to and including 5 cm in thickness; and
 - (2) not more than 0.5 % for overlays more than 5 cm in thickness.
- (b) Before a runway being overlaid is returned to a temporary operational status, a runway centre line marking, conforming to the applicable specifications included in the aerodrome certification basis of the aerodrome, should be provided.

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- (c) The location of any temporary threshold should be identified by a 3.6 m wide transverse stripe.

AMC3 ADR.OPS.B.070 Aerodrome works safety

MARKING AND LIGHTING OF UNSERVICEABLE AREAS

- (a) The aerodrome operator should ensure that:
 - (1) unserviceability markers are displayed whenever any portion of a taxiway, apron, or holding bay is unfit for the movement of aircraft but it is still possible for aircraft to bypass the area safely;
 - (2) on a movement area used at night, unserviceability lights should be used; and
 - (3) Unserviceability markers and lights are placed at intervals sufficiently close so as to delineate the unserviceable area.
- (b) Unserviceability markers should consist of conspicuous upstanding devices such as flags, cones, or marker boards.
- (c) Unserviceability markers and lights should meet the specifications described in CS ADR.DSN.R.870.

GM1 ADR.OPS.B.070 Aerodrome works safety

MAINTENANCE WORKS

- (a) Persons or sections entering the movement area to perform maintenance should have a written approval by the aerodrome operator.
- (b) Entrance to the movement area should be subject to clearance by the unit responsible for that area (ATC, apron management, aerodrome operator, etc.) using appropriate means (R/T, telephone, etc.).
- (c) Individuals carrying out maintenance works should comply with local rules concerning the control and operation of vehicles in the movement area.

GM2 ADR.OPS.B.070 Aerodrome works safety

MINOR CONSTRUCTION/MAINTENANCE WORK

- (a) A system of work permits should be established for minor works on the movement area.
- (b) The objectives of the work permits should be such that:
 - (1) no work is taking place on the movement area without the knowledge of aerodrome operator's staff and air traffic services;
 - (2) permitted times of work are strictly followed; and
 - (3) all individuals taking part in the work are briefed in detail on the following:
 - (i) precise areas in which work may be done;
 - (ii) the routes to be followed to and from the working area;

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- (iii) the R/T procedures to be used;
 - (iv) the safety precautions to be observed , the maintenance of a listening watch and the use of look-outs; and
 - (v) the reporting procedure to be followed on completion of work.
- (c) At the conclusion of work, aerodrome operator's staff, or other appropriate staff, should inspect the working area to ensure that it has been left in a satisfactory condition.

GM3 ADR.OPS.B.070 Aerodrome works safety

MAJOR CONSTRUCTION/MAINTENANCE WORK

- (a) Examples of major construction activities which may have an impact on safety, and require a prior approval by the Competent Authority, include, but are not limited to, the following:
- (1) development/alteration/extension of aerodrome terminals;
 - (2) development/alteration/extension of hangars;
 - (3) development of new aerodrome control tower;
 - (4) development of any other structure that may have an impact on safety;
 - (5) Etc.
- (b) Before the commencement of any substantial work on the movement area, a liaison group comprising representatives from the aerodrome operator, air traffic services, apron management services, if applicable, and subcontractors' agents should be established.
- (c) The group could meet, as often as considered necessary, to review progress, and consider the need for any change in working practices to meet operational requirements.
- (d) As far as practicable, working areas should be blocked off from the active parts of the movement area by the erection of physical barriers.
- (e) Consideration should be given to the marking and lighting of barriers.
- (f) The lights of taxiways leading into working areas should be permanently 'off'.
- (g) Before works commence, the following should be established:
- (1) the hours of work;
 - (2) the authorised routes;
 - (3) the communications facilities to be used;
 - (4) the permitted heights of vehicles and equipment, and the limitations to be placed on operating heights of cranes; and
 - (5) any limitation to be placed on use of electrical equipment which might cause interference with navigational facilities or aircraft communications.
- (h) Contractors should be briefed for possible hazards to personnel working on aerodromes, in particular the jet blast problem and noise.

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- (i) Where contractors work on or traverse aircraft pavement areas, these areas should be inspected thoroughly before they are opened again for aircraft use, with particular attention to the presence of debris and the general cleanliness of the surface.
- (j) Where aircraft are constantly using areas open to contractors, inspections at frequent intervals are required to ensure the continuing operational safety of the aerodrome.
- (k) Adequate marking arrangements should be provided for crane jibs when extra conspicuity is considered desirable.
- (l) If work is of prolonged duration, a constant watch is required to ensure that the marking and lighting of obstacles and unserviceable areas does not degrade below acceptable limits.
- (m) The effect of tall cranes on ILS and radar, in conjunction with those responsible for electronic landing aids and steps taken to reduce limitations to the minimum, should be considered.

GM4 ADR.OPS.B.070 Aerodromes works safety

USE OF UNSERVICEABILITY LIGHTS

When lights are used to mark temporary unserviceable areas at night or during reduced visibility conditions, these lights mark the most potentially dangerous extremities of the area. A minimum of four such lights could be used, except where the area is triangular in shape where a minimum of three lights may be employed. The number of lights may be increased when the area is large or of unusual configuration. At least one light should be installed for each 7.5 m of peripheral distance of the area. If the lights are directional, they should be orientated so that, as far as possible, their beams are aligned in the direction from which aircraft or vehicles will approach. Where aircraft or vehicles will normally approach from several directions, consideration should be given to adding extra lights or using omnidirectional lights to show the area from these directions. Unserviceable area lights should be frangible. Their height should be sufficiently low to preserve clearance for propellers and for engine pods of jet aircraft.

GM5 ADR.OPS.B.070 Aerodrome works safety

WORKS REQUIRING PRIOR COMPETENT AUTHORITY APPROVAL

Examples of works which require an approval are: the construction of new buildings or the expansion of existing buildings at the aerodrome, the construction or relocation of a control tower, etc.

AMC1 ADR.OPS.B.075 Safeguarding of aerodromes

GENERAL

- (a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting, and in human activities or land use on the aerodrome

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and the areas around the aerodrome, as defined in coordination with the Competent Authority. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant air traffic services providers, and with the Competent Authority and other relevant authorities.

- (b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the Competent Authority and should include the areas that can be visually monitored during the inspections of the manoeuvring area.
- (c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks, and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant air traffic services providers, and with the Competent Authority and other relevant authorities.
- (d) The risks caused by human activities and land use which should be assessed and mitigated should include:
 - (1) obstacles and the possibility of induced turbulence;
 - (2) the use of hazardous, confusing, and misleading lights;
 - (3) the dazzling caused by large and highly reflective surfaces;
 - (4) sources of non-visible radiation, or the presence of moving, or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems; and
 - (5) non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened, or otherwise modified so as to eliminate the source of danger.

GM1 ADR.OPS.B.075 (a) (1) Safeguarding of aerodromes

OTHER SURFACES TO BE MONITORED

Other surfaces associated with the aerodrome are surfaces that need to be monitored when operating in accordance with ICAO PANS-OPS Doc 8168, Volume II or its equivalent in the national law, when applicable.

GM2 ADR.OPS,B.075 (a) (1) Safeguarding of aerodromes

OTHER AREAS TO BE MONITORED AND PROTECTED

Aeronautical communications, navigation and surveillance systems should be established and protected in accordance with the requirements of ICAO Annex 10.

AMC1 ADR.OPS.B.080 Marking and lighting of vehicles and other mobile objects

GENERAL

AMC/GM to Annex III – Part-OPS

SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B)

- (a) The aerodrome operator should ensure that all vehicles operating on the manoeuvring area are marked by colours or display flags.
- (b) When mobile objects are marked by colour, a single conspicuous colour, preferably red or yellowish green for emergency vehicles, and yellow for service vehicles, should be used;
- (c) When flags are used to mark mobile objects, they should comply with the applicable CSs;
- (d) Low-intensity obstacle lights, Type C, should be displayed on vehicles and other mobile objects excluding aircraft;
- (e) Low-intensity obstacle lights, Type D, should be displayed on follow-me vehicles.

AMC1 ADR.OPS.B.090 Use of the aerodrome by higher code letter aircraft

ELEMENTS TO BE ASSESSED

When assessing the possibility of operation of aircraft whose code letter is higher than the code letter of the aerodrome reference code, the aerodrome operator should, amongst other issues, assess the impact of the characteristics of the aircraft on the aerodrome, its facilities, equipment and its operation, and vice versa.

Aircraft characteristics to be assessed include, but are not limited to:

- (a) fuselage length;
- (b) fuselage width;
- (c) fuselage height;
- (d) tail height;
- (e) wingspan;
- (f) wing tip vertical clearance;
- (g) cockpit view;
- (h) distance from the pilot's eye position to the nose landing gear and to the main landing gear;
- (i) landing gear design;
- (j) outer main gear wheel span;
- (k) wheelbase;
- (l) main gear steering system;
- (m) landing gear geometry;
- (n) engine data;
- (o) flight performance; and
- (p) technology evolution.

GM1 ADR.OPS.B.090 Use of the aerodrome by higher code letter aircraft

ELEMENTS TO BE ASSESSED

AMC/GM to Annex III – Part-OPS

*SUBPART B – AERODROME OPERATIONAL SERVICES, EQUIPMENT AND
INSTALLATIONS (ADR.OPS.B)*

Further guidance on this issue is contained in ICAO Circular 305-AN/177 and ICAO Circular 301-AN/174.

In any case, the elements that have to be taken into account for the safety assessment are, without prejudice to other assessments that may have to be conducted, in accordance with other applicable requirements contained in Part ADR.OPS.

Such assessments should include, but are not limited to:

- (a) the aircraft mass, tire pressure and ACN values — with regard to overload operations; and
- (b) maximum passenger and fuel carrying capacity — with regard to level of RFFS protection to be provided and the aerodrome emergency planning.

SUBPART C – AERODROME MAINTENANCE

AMC1 ADR.OPS.C.005 General

MAINTENANCE PROGRAMME

The aerodrome operator should ensure that a maintenance programme is established and implemented, including preventive maintenance where appropriate, to maintain aerodrome facilities in a condition which does not impair the safety of aeronautical operations. The scope of the maintenance programme should include, but may not be limited to, the following items:

- (a) visual aids and other lighting systems required for the safety of aerodrome operations;
- (b) power supply and other electrical systems;
- (c) pavements, other ground surfaces, and drainage systems;
- (d) fencing and other access control devices;
- (e) equipment and vehicles which are necessary for the safety of aerodrome operations; and
- (f) buildings which are necessary for the safety of aerodrome operations.

GM1 ADR.OPS.C.005 General

HUMAN FACTORS

The design and application of the maintenance programme should observe human factors principles.

GM2 ADR.OPS.C.005 General

MAJOR MAINTENANCE ACTIVITIES

Examples of major maintenance activities that require a prior approval by the Competent Authority include, but are not limited to, the following:

- (a) runway and taxiway resurfacing;
- (b) replacement of the aeronautical ground lighting systems; and
- (c) other maintenance activities that may require the temporary closure of a runway, or a taxiway, or otherwise may disrupt, or have significant effects on aerodrome operation.

AMC1 ADR.OPS.C.010 Pavements, other ground surfaces, and drainage

GENERAL

- (a) The aerodrome operator should maintain the surface of a paved runway in a condition so as to provide good friction characteristics and low rolling resistance. Mud, dust, sand, oil, rubber deposits, and other pollutants should be removed, as rapidly and completely as possible, to minimise accumulation.
- (b) Taxiways and aprons should be kept clear of pollutants to the extent necessary to enable aircraft to be taxied to and from an operational runway.

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SUBPART C – AERODROME MAINTENANCE (ADR.OPS.C)

- (c) Drainage systems and storm water collection systems should be periodically checked and, if necessary cleaned or maintained, to ensure efficient water run-off.
- (d) The aerodrome operator should measure the runway surface friction characteristics for maintenance purpose with a continuous friction measuring device using self-wetting features. The frequency of these measurements should be sufficient to determine the trend of the surface friction characteristics of the runway.
- (e) The aerodrome operator should take corrective maintenance action to prevent the runway surface friction characteristics for either the entire runway, or a portion thereof from falling below the minimum friction level specified by the State.
- (f) When the friction of a significant portion of a runway is found to be below the minimum friction level value, the aerodrome operator should report such information in order to promulgate it in a NOTAM specifying which portion of the runway is below the minimum friction level and its location on the runway, and take immediate corrective action.

GM1 ADR.OPS.C.010(b)(3) Pavements, other ground surfaces and drainage

DETERMINATION OF FRICTION CHARACTERISTICS OF WET PAVED SURFACES

- (a) The friction of a wet paved runway should be measured to:
 - (1) verify the friction characteristics of new or resurfaced paved runways when wet;
 - (2) assess periodically the slipperiness of paved runways when wet;
 - (3) determine the effect on friction when drainage characteristics are poor; and
 - (4) determine the friction of paved runways that become slippery under unusual conditions.
- (b) Runways should be evaluated when first constructed or after resurfacing, to determine the wet runway surface friction characteristics. Although it is recognised that friction reduces with use, this value will represent the friction of the relatively long central portion of the runway that is uncontaminated by rubber deposits from aircraft operations, and is, therefore, of operational value. Evaluation tests should be made on clean surfaces. If it is not possible to clean a surface before testing, then for purposes of preparing an initial report, a test could be made on a portion of clean surface in the central part of the runway.
- (c) Friction tests of existing surface conditions should be taken periodically in order to identify runways with low friction when wet. When the friction of a runway is found to be below the minimum friction level, then such information should be promulgated by NOTAM. When the friction characteristics for either the entire runway or a portion thereof are below the minimum friction level, corrective maintenance action must be taken without delay. Friction measurements should be taken at intervals that will ensure identification of runways in need of maintenance or special surface treatment before the condition becomes serious. The time interval between measurements will depend on factors such as: aircraft type and frequency of usage, climatic conditions, pavement type, and pavement service and maintenance requirements.

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SUBPART C – AERODROME MAINTENANCE (ADR.OPS.C)

- (d) For uniformity and to permit comparison with other runways, friction tests of existing, new, or resurfaced runways should be made with a continuous friction measuring device provided with a smooth tread tire. The device should have a capability of using self-wetting features to enable measurements of the friction characteristics of the surface to be made at a water depth of, at least, 1 mm.
- (e) When it is suspected that the friction characteristics of a runway may be reduced because of poor drainage, owing to inadequate slopes or depressions, then an additional test should be made, but this time under natural conditions representative of a local rain. This test differs from the previous one in that water depths in the poorly cleared areas are normally greater in a local rain condition. The test results are, thus, more apt to identify problem areas having low friction values that could induce aquaplaning than the previous test. If circumstances do not permit tests to be conducted during natural conditions representative of a rain, then this condition may be simulated.
- (f) Even when the friction has been found to be above the minimum friction level defining a slippery runway, it may be known that under unusual conditions, such as after a long dry period, the runway may have become slippery. When such a condition is known to exist, then a friction measurement should be made as soon as it is suspected that the runway may have become slippery.
- (g) When the results of any of the measurements identified in (c) through (f) above indicate that only a particular portion of a runway surface is slippery, then action to promulgate this information and, if appropriate, take corrective action is equally important.
- (h) When conducting friction tests on wet runways, it is important to note that, unlike compacted snow and ice conditions, in which there is very limited variation of the friction coefficient with speed, a wet runway produces a drop in friction with an increase in speed. However, as the speed increases, the rate at which the friction is reduced becomes less. Among the factors affecting the friction coefficient between the tire and the runway surface, texture is particularly important. If the runway has a good macro-texture allowing the water to escape beneath the tire, then the friction value will be less affected by speed. Conversely, a low macro-texture surface will produce a larger drop in friction with increase in speed. Accordingly, when testing runways to determine their friction characteristics and whether maintenance action is necessary to improve it, a speed high enough to reveal these friction/speed variations should be used.
- (i) The design objective for new runway surfaces and maintenance planning, and minimum friction levels for runway surface in use, should be according to the following table:

Test equipment	Test tire		Test speed (km/h)	Test water depth (mm)	Design objective for new surface	Maintenance planning level	Minimum friction level
	Type	Pressure (kPa)					
Mu-meter Trailer	A	70	65	1.0	0.72	0.52	0.42
	A	70	95	1.0	0.66	0.38	0.26
Skiddometer	B	210	65	1.0	0.82	0.60	0.50

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SUBPART C – AERODROME MAINTENANCE (ADR.OPS.C)

Trailer	B	210	95	1.0	0.74	0.47	0.34
Surface Friction Tester Vehicle	B	210	65	1.0	0.82	0.60	0.50
	B	210	95	1.0	0.74	0.47	0.34
Runway Friction Tester Vehicle	B	210	65	1.0	0.82	0.60	0.50
	B	210	95	1.0	0.74	0.54	0.41
TATRA Friction Tester Vehicle	B	210	65	1.0	0.76	0.57	0.48
	B	210	95	1.0	0.67	0.52	0.42
Grip Tester Trailer	B	140	65	1.0	0.74	0.53	0.43
	B	140	95	1.0	0.64	0.36	0.24

Table 1

- (j) Other friction measuring devices can be used, provided they have been correlated with, at least, one test equipment mentioned in the table above.

GM2 ADR.OPS.C.010 (b) (1) Pavements, other ground surfaces, and drainage

OVERLOAD OPERATIONS

- (a) Overloading of pavements can result either from loads too large, or from a substantially increased application rate, or both. Loads larger than the defined (design or evaluation) load shorten the design life, whilst smaller loads extend it. With the exception of massive overloading, pavements in their structural behaviour are not subject to a particular limiting load above which they suddenly or catastrophically fail. Behaviour is such that a pavement can sustain a definable load for an expected number of repetitions during its design life. As a result, occasional minor overloading is acceptable, when expedient, with only limited loss in pavement life expectancy, and relatively small acceleration of pavement deterioration. For those operations in which magnitude of overload and/or the frequency of use do not justify a detailed analysis, the following criteria are suggested:
- (1) for flexible pavements, occasional movements by aircraft with ACN not exceeding 10 % above the reported PCN should not adversely affect the pavement;
 - (2) for rigid or composite pavements, in which a rigid pavement layer provides a primary element of the structure, occasional movements by aircraft with ACN not exceeding 5 % above the reported PCN should not adversely affect the pavement;
 - (3) if the pavement structure is unknown, the 5 % limitation should apply; and
 - (4) the annual number of overload movements should not exceed approximately 5 % of the total annual aircraft movements.
- (b) Such overload movements should not normally be permitted on pavements exhibiting signs of distress or failure. Furthermore, overloading should be avoided during any periods of thaw following frost penetration, or when the strength of the pavement or its subgrade could be weakened by water. Where overload operations are conducted, the aerodrome operator should review the relevant pavement condition regularly, and should also review the criteria for overload operations periodically since excessive repetition of

overloads can cause severe shortening of pavement life, or require major rehabilitation of pavement.

GM3 ADR.OPS.C.010 (b) (2) Pavements, other ground surfaces, and drainage

RUNWAY SURFACE EVENNESS

- (a) The operation of aircraft and differential settlement of surface foundations will eventually lead to increases in surface irregularities. Small deviations in the above tolerances will not seriously hamper aircraft operations. In general, isolated irregularities of the order of 2.5 cm to 3 cm over a 45 m-distance are tolerable. Although maximum acceptable deviations vary with the type and speed of an aircraft, the limits of acceptable surface irregularities can be estimated to a reasonable extent. The following table describes maximum and temporarily acceptable limits.

Surface Irregularity	Minimum acceptable length of irregularity (m)								
	3	6	9	12	15	20	30	45	60
Maximum surface irregularity height (or depth) (cm)	3	3.5	4	5	5.5	6	6.5	8	10
Temporary acceptable surface irregularity height (or depth) (cm)	3.5	5.5	6.5	7.5	8	9	11	13	15

Table 1

If the maximum limits are exceeded, corrective action should be undertaken, as soon as reasonably practicable, to improve the ride quality. If the temporarily acceptable limits are exceeded, the portions of the runway that exhibit such roughness should have corrective measures taken immediately if aircraft operations are to be continued.

- (b) The term 'surface irregularity' is defined herein to mean isolated surface elevation deviations that do not lie along a uniform slope through any given section of a runway. For the purposes of this concern, a 'section of a runway' is defined herein to mean a segment of a runway throughout which a continuing general uphill, downhill, or flat slope is prevalent. The length of this section is generally between 30 and 60 m, and can be greater, depending on the longitudinal profile and the condition of the pavement.

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SUBPART C – AERODROME MAINTENANCE (ADR.OPS.C)

- (c) Deformation of the runway with time may also increase the possibility of the formation of water pools. Pools as shallow as approximately 3 mm in depth, particularly if they are located where they are likely to be encountered at high speed by landing aeroplanes, can induce aquaplaning which can then be sustained on a wet runway by a much shallower depth of water. Improved guidance regarding the significant length and depth of pools relative to aquaplaning is the subject of further research. It is, of course, especially necessary to prevent pools from forming whenever there is a possibility that they might become frozen.
- (d) Macrottexture and microtexture are taken into consideration in order to provide the required surface friction characteristics. This normally requires some form of special surface treatment.

AMC1 ADR.OPS.C.015 Visual aids and electrical systems

GENERAL

- (a) The aerodrome operator should establish a system of corrective and preventive maintenance which ensures that a light is deemed unserviceable when the main beam average intensity is less than 50 % of the value specified in the applicable CSs. For light units where the designed main beam average intensity is above the specified in the applicable CSs, the 50 % value should be related to that design value.
- (b) The aerodrome operator should establish a system of preventive maintenance of visual aids to ensure lighting and marking system reliability and serviceability as required for the intended operations.