



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

'Authority, Organisation and Operations Requirements for Aerodromes'

'CRD to NPA 2011-20 (D) – Regulatory Impact Assessment'

IV. CRD table of comments, responses and resulting text**(General Comments)**

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comment

1 comment by: *CAA-NL*Transition period for Member States and competent authority:

For aerodrome operators there is a transition period of 48 months to comply with the new organisation and operations requirements for aerodromes. The Member State and competent authority also need a transition period to comply with the requirements and to adjust national legislation and the management system.

response

Noted

It is proposed that the transition period of 48 months also applies to Member States and Competent Authority.

NOTICE OF PROPOSED AMENDMENT NPA 2011-20 (D) – Regulatory Impact Assessment

p. 1-131

comment

3 comment by: *SWISS AERODROMES ASSOCIATION*

We refer to the general comments filed under NPA 2011-20 (A) and regret that EASA did not assess the impact of the options of possible rulemaking approaches - including "option 0" - before entering into the rulemaking process.

The RIA conducted in this domain rather assessed some selected examples of the present implementation of ICAO SARPs.

One of the interesting issues would have been to assess the existence or not of a gain in Safety by ruling in this matter further than BRs and ERs do.

response

Not accepted

The Option 0 was assessed as indicated in the NPA-2011-20 (D) document, section 4.2.1., page 22. The NPA does not rule further than the BRs and ERs do.

comment

4 comment by: *Zürich Airport*

We do consider the Regulatory Impact Assessment just as a pre-regulating safety study and we do strongly suggest the Agency to repeat and consolidate

	<p>this study in a new pre-implementing safety survey - taking in consideration all of accepted changes during this comment-response process.</p>
response	<p>Noted</p> <p>'We do consider the Regulatory Impact Assessment just as a pre-regulating safety study '</p> <p>Not accepted. This Regulatory Impact Assessment assessed all the impacts listed in the RIA methodology with the support of detailed information from case studies.</p> <p>'we do strongly suggest the Agency to repeat and consolidate this study...'</p> <p>Noted. There is not usually a new Regulatory Impact Assessment with the EASA Opinion unless there were significant changes which would change the impacts already identified.</p>
comment	<p>5 comment by: <i>MWEBWV Ministerium für Wirtschaft, Energie, Bauen, Wohnen und Verkehr des Landes Nordrhein-Westfalen</i></p> <p>Comprehension question:</p> <p>With reference to article 6 the question is to be answered, how is to be dealt with existing aerodromes, which could not demonstrate compliance (completely or partly) with the elements of the "Basic Regulation" and/or the "ADR-Certification-Basis" in the given period (e.g. 48 months)?</p> <p>The answering of this question has a special meaning, because there is no distinction in the current NPAs and CSs between ICAO-Recommendations and ICAO-Standards. This causes an enormous (time- and cost-intensively) expenditure to investigate existing aerodromes.</p> <p>The period of 48 months, specified in article 6, is not justified and possibly too short in many cases (existing airports).</p>
response	<p>Not accepted</p> <p>The NPA proposes flexibility to justify deviations versus the draft Certification Specifications using either :</p> <ul style="list-style-type: none"> • ELoS ; • Special Condition; or • a specific mechanism available up to 2019: NPA 2011-20 (B.I) Article 7 'Deviations from Certification Specifications' <p>The 48-month transitional period was decided with the inputs from Member States, competent authorities, and the airport industry.</p>

comment	6 <p>In the section "Taxiway markings and taxiway width", bottom of page 697 of the NPA, there is a link made between "adequate clearance between taxiing and parked aeroplanes" and "appropriate taxiway width". This link is not clear and clarification should be provided.</p>	comment by: AIRBUS
response	<p>Noted</p> <p>The next sentence of the accident narration reads: 'This accident shows that the provision of the appropriate taxiway width, as well as the appropriate taxiway markings are important for aviation safety, especially considering the fact that in most modern large jet aircraft the wingtips are not visible from the flight crew position'.</p>	