



Explanatory Note to ED Decision 2024/004/R

in accordance with Article 4(2) of MB Decision 01-2022

Regular update of the aerodrome rules *Aerodrome safety and change of aerodrome operator*

RMT.0591 (SUBTASK 3)

Occurrence reporting

RMT.0681

EXECUTIVE SUMMARY

This Decision amends the Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Regulation (EU) No 139/2014 (the Aerodrome Regulation) to support stakeholders in implementing the recent amendments to the Regulation introduced through Implementing Regulation (EU) 2024/894 and Delegated Regulation (EU) 2024/1400. As regards the operation and organisation of aerodromes, the new AMC and GM include the following highlights:

- clarification of the role of the **aerodrome safety-reporting system** to enable a holistic system based on sharing of information on occurrences between different organisations using the aerodrome;
- means to **remove disabled aircraft** from the aerodrome;
- organisational and safety aspects related to **maintenance works** performed at the aerodrome;
- organisation of a **change from one aerodrome operator to another aerodrome operator**;
- **combination** of the safety-related aerodrome functions of **safety management** and **compliance monitoring**; and
- organisation of training of aerodrome personnel by **combining** the roles of the **instructor** and the **assessor**.

The objectives of this Decision are to increase the level of safety, ensure harmonisation between the practices of the EASA Member States, ensure consistency between the requirements of Regulation (EU) 2018/1139 and the EASA regulatory material, and reflect the industry state of the art and best practices.

REGULATION(S) TO BE AMENDED

N/A

ED DECISION(S) TO BE AMENDED

[ED Decision 2014/012/R](#) – AMC & GM to Authority, Organisation and Operations Requirements for Aerodromes

AFFECTED STAKEHOLDERS: Aerodrome operators; national competent authorities

WORKING METHODS

Development	Impact assessment(s)	Consultation
By EASA	Light	NPA — Public Focused — ABs

RELATED DOCUMENTS / INFORMATION

- [ToR RMT.0591 - Issue 3](#), issued on 6.3.2017;
- [NPA 2020-10](#)
- [CRD 2020-10 \(Part 2\)](#)
- [ToR RMT.0681 - Issue 1](#), issued on 30.9.2015
- [NPA 2016-19](#)
- [CRD 2016-19](#)
- [Opinion No 04/2023](#), issued on 1.9.2023

PLANNING MILESTONES: Refer to the latest edition of the EPAS *Volume II*.



Table of contents

1.	About this Decision.....	3
2.	In summary — why and what	6
2.1.	Why we need to act.....	6
2.2.	What we want to achieve — objectives.....	6
2.3.	How we want to achieve it — overview of the amendments.....	6
2.4.	What are the stakeholders’ views	12
2.4.1.	Regular update of the aerodrome rules (RMT.0591).....	12
2.4.2.	Alignment of the aerodrome rules with Regulation (EU) No 376/2014 on the reporting, analysis and follow-up of occurrences in aviation (RMT.0681)	13
2.4.3.	Additional items for which a focused consultation was performed with the Advisory Bodies for Aerodromes (ADR TeB and TEC) (8-23 November 2022).....	13
2.4.4.	Additional items for which a focused consultation was performed with the Advisory Bodies for Aerodromes (ADR TeB and ADR.CSTG) (11-25 April 2024)....	14
3.	What are the expected benefits and drawbacks of the regulatory material	15
4.	Monitoring and evaluation	16
5.	Proposed actions to support implementation	17
6.	References.....	18



1. About this Decision

The European Union Aviation Safety Agency (EASA) developed this Decision in line with Regulation (EU) 2018/1139¹ (the Basic Regulation) and the Rulemaking Procedure².

The Terms of Reference (ToR) for rulemaking task (RMT).0681³ 'Alignment of implementing rules and acceptable means of compliance/guidance material with Regulation (EU) No 376/2014 — Occurrence reporting' (Issue 1) were issued in September 2015 and covered all aviation domains within the remit of the Basic Regulation. This RMT is currently included in Volume II of the European Plan for Aviation Safety (EPAS) for 2023–2025⁴. Following the publication of the ToR, Notice of Proposed Amendment (NPA) 2016-19⁵ 'Alignment of implementing rules and acceptable means of compliance/guidance material with Regulation (EU) No 376/2014 — Occurrence reporting' was submitted for public consultation in December 2016. The corresponding Comment-Response Document (CRD) 2016-19⁶ was published in May 2019. Considering the interdependencies between this RMT and a number of concurrent EASA RMTs and with a view to limiting the number of Opinions issued in 2018, the Agency decided not to issue a stand-alone Opinion for this RMT, but instead to hand over the rulemaking deliverables for each affected EU aviation regulation 'Part' to the domain-specific rulemaking units through existing RMTs. For the Aerodromes domain this is RMT.0591.

The ToR for RMT.0591⁷ 'Regular update of aerodrome rules' (Issue 3) were issued in March 2017, and the RMT is currently included in Volume II of the EPAS 2023-2025 edition as Subtask 3. Based on the ToR, EASA developed NPA 2020-10⁸ 'Regular update of aerodrome rules' which included proposed amendments to Regulation (EU) No 139/2014⁹ and the related acceptable means of compliance (AMC) and guidance material (GM), as well as to the Certification Specifications and Guidance Material for

¹ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<http://data.europa.eu/eli/reg/2018/1139/oj>).

² EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 replacing Decision No 18-2015 of 15 December 2015 concerning the procedure to be applied by EASA for the issuing of opinions, certification specifications and guidance material ([EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 \(by written procedure\) | EASA \(europa.eu\)](https://easa.europa.eu/decision/01-2022-on-the-rulemaking-procedure-repealing-mb-decision-18-2015-by-written-procedure)).

³ [ToR RMT.0681 - Occurrence Reporting | EASA \(europa.eu\)](https://easa.europa.eu/to-r/rmt-0681-occurrence-reporting)

⁴ [EPAS Volume II 2024 edition](https://easa.europa.eu/epas-volume-ii-2024-edition)

⁵ [NPA 2016-19 - Alignment of implementing rules and acceptable means of compliance/guidance material with Regulation \(EU\) No 376/2014 - Occurrence reporting | EASA \(europa.eu\)](https://easa.europa.eu/npa-2016-19-alignment-of-implementing-rules-and-acceptable-means-of-compliance-guidance-material-with-regulation-eu-no-376-2014-occurrence-reporting)

⁶ [CRD 2016-19 - Alignment of EASA Basic Regulation \(Regulation \(EU\) 2018/1139\) with the specific obligations stemming from Regulation \(EU\) No 376/2014 | EASA \(europa.eu\)](https://easa.europa.eu/crd-2016-19-alignment-of-easa-basic-regulation-regulation-eu-2018-1139-with-the-specific-obligations-stemming-from-regulation-eu-no-376-2014)

⁷ [ToR RMT.0591 - Regular update of aerodromes rules | EASA \(europa.eu\)](https://easa.europa.eu/to-r/rmt-0591-regular-update-of-aerodromes-rules)

⁸ [NPA 2020-10 - Regular update of aerodromes rules | EASA \(europa.eu\)](https://easa.europa.eu/npa-2020-10-regular-update-of-aerodromes-rules)

⁹ Commission Regulation (EU) No 139/2014 of 12 February 2014 laying down requirements and administrative procedures related to aerodromes pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 44, 14.2.2014, p. 1) (<https://eur-lex.europa.eu/eli/reg/2014/139/oj>).

Aerodrome Design (CS-ADR-DSN) and the related GM and submitted it for consultation in November 2020. The corresponding Comment-Response Document (CRD) 2020-10¹⁰ was published in two parts.

- Part 1 of the CRD, published in March 2022, was related only to the proposed amendments to CS-ADR-DSN and led to the adoption of Issue 6 of CS-ADR-DSN¹¹ in the same month.
- Part 2 of the CRD was published in August 2023 and addressed the comments submitted on the proposed amendments to the implementing rules (IRs), AMC & GM related to the IRs and a small number of CSs & GM related to the AMC & GM proposed for amendment.

Within this period — and specifically between 8 and 23 November 2022 — a focused written consultation with the Advisory Bodies for Aerodromes (ADR TeB and TEC) took place on additional items to those included in NPA 2020-10. This consultation round led to additional proposals for amendments to the IRs. One of these amendments is related to AMC that are included in the present Decision.

EASA published Opinion No 04/2023 on 1 September 2023, proposing amendments to Regulation (EU) No 139/2014. Based on this, the European Commission adopted Implementing Regulation (EU) 2024/894, published on 20 March 2024¹², and Delegated Regulation (EU) 2024/1400, published on 24 May 2024¹³, amending Regulation (EU) No 139/2014.

Due to the changes introduced in relation to Opinion No 04/2023 and a small number of new comments received by the Member States regarding specific points of the AMC and GM already in force, a second round of focused written consultation with the ABs took place between 11 and 25 April 2024 and the Agency duly considered the comments received.

EASA developed the final text of the AMC and GM based on the above-mentioned public consultations (CRD 2016-19 and Part 2 of CRD 2020-10), the focused consultations (08-23 November 2022 and 11-25 April 2024) and after taking into account that:

- the adoption of International Civil Aviation Organization (ICAO)'s new Pavement Classification Rating (PCR) methodology for expressing and calculating the pavement bearing strength within Regulation (EU) 2017/373¹⁴ through the ongoing RMT.0719 (Subtask 4b), as described in the related NPA 2023-08(B)¹⁵, must first be completed, before the PCR methodology can be included within Part-ADR;

¹⁰ [CRD 2020-10 - Certification Specifications and Guidance Material for Aerodrome Design \(CS-ADR-DSN\) | EASA \(europa.eu\)](#)

¹¹ [ED Decision 2022/006/R - Certification Specifications and Guidance Material for Aerodrome Design \(CS-ADR-DSN\) | EASA \(europa.eu\)](#)

¹² Commission Implementing Regulation (EU) 2024/894 of 13 March 2024 amending Regulation (EU) No 139/2014 as regards occurrence reporting (OJ L, 2024/894, 20.3.2024) (http://data.europa.eu/eli/reg_impl/2024/894/oj).

¹³ Commission Delegated Regulation (EU) 2024/1400 of 13 March 2024 amending Regulation (EU) No 139/2014 as regards aerodrome safety, change of aerodrome operator and occurrence reporting (OJ L, 2024/1400, 24.5.2024) (http://data.europa.eu/eli/reg_del/2024/1400/oj).

¹⁴ Commission Implementing Regulation (EU) 2017/373 of 1 March 2017 laying down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight, repealing Regulation (EC) No 482/2008, Implementing Regulations (EU) No 1034/2011, (EU) No 1035/2011 and (EU) 2016/1377 and amending Regulation (EU) No 677/2011 (OJ L 62, 8.3.2017, p. 1) (http://data.europa.eu/eli/reg_impl/2017/373/oj).

¹⁵ [NPA 2023-08 - Regular update of the air traffic management / air navigation services rules | EASA \(europa.eu\)](#)

- Delegated Regulation (EU) 2024/1400 — linked to the deletion of a number of CS & GM — must first be applicable before a new issue of the CS & GM is published;
- the proposed amendments to the aeronautical data regulatory material should be dealt with through a separate rulemaking task (RMT.0722)¹⁶ due to their extent and relation with the ATM/ANS domain.

¹⁶ [ToR RMT.0722 - Provision of aeronautical data by the aerodrome operator | EASA \(europa.eu\)](#)



2. In summary — why and what

2.1. Why we need to act

Implementing Regulation (EU) 2024/894 and Delegated Regulation (EU) 2024/1400 have amended Regulation (EU) No 139/2014 in several aspects. The underlying issues for the adoption of these Regulations have been described in the corresponding RMTs (NPA 2020-10 and NPA 2016-19) and in Opinion No 04/2023, where more details can be found. Additionally, as far as the provisions developed through the focused consultation are concerned, they were triggered by the need of the stakeholders for provisions related to:

- situations where a certified aerodrome operator ceases its operations and a new aerodrome operator takes over;
- the possibility to combine the functions of the safety management and the compliance monitoring under a single person as already described in Regulation (EU) 2017/373; and
- the possibility to combine the roles of the instructor and the assessor into a single person.

Therefore, so as to support the stakeholders in applying the newly adopted IRs, several AMC & GM to Part-ADR needed to be either adopted or amended.

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. The regulatory material presented here is expected to contribute to achieving these overall objectives by addressing the issues described in Section 2.1.

More specifically, with the regulatory material presented here, EASA intends to support the application of the amendments to Regulation (EU) No 139/2014, the detailed objectives of which are explained in Section 2.2 of NPAs 2020-10 and 2016-19.

Additional objectives, related to the comments received during the consultation periods, are to:

- increase the level of safety;
- ensure harmonisation between the practices of the EASA Member States; and
- reflect the industry state of the art and best practices.

2.3. How we want to achieve it — overview of the amendments

The amendments to Regulation (EU) No 139/2014 are accompanied with the necessary regulatory material (AMC and GM) that will enable:

- the aerodrome operators and the apron management service providers to show compliance with the new IRs; and
- the competent authorities of the Member States to verify this compliance.

The present ED Decision introduces or amends a series of AMC and GM, as follows:

GM1 4a [Aerodrome] traffic density

This GM contains the categories of the [aerodrome] traffic density ('light', 'medium' and 'heavy'). These terms could not be included in the main definition of the [aerodrome] traffic density that was introduced as point (4a) in Annex I ('Definitions') to Regulation (EU) No 139/2014 through Delegated Regulation (EU) 2024/1400, because they do not appear explicitly within the text of Regulation (EU) No 139/2014.

AMC1 ADR.AR.A.025(b) Information to the Agency

This AMC introduces a means by which the competent authorities could satisfy their obligation to ensure an efficient exchange of safety-significant information with the Agency.

AMC1 ADR.AR.C.015(b) Initiation of the certification process

This AMC is added to cover the cases when a new aerodrome comes under the scope of the Basic Regulation.

*AMC1 ADR.OR.C.030 and AMC1 ADR.OR.C.030(a) Occurrence reporting**AMC1 ADR.OR.D.030, AMC1 ADR.OR.D.030(b);(c)(1) Safety reporting system*

The AMC to ADR.OR.C.030 and ADR.OR.D.030 have been reviewed to:

- better clarify the link between the operator's own safety-reporting system and the mandatory/voluntary reporting to the competent authority as required by Regulation (EU) No 376/2014¹⁷; and
- highlight the importance of reporting between organisations.

AMC1 ADR.OR.D.005(b)(2), GM1 ADR.OR.D.005(b)(2), AMC1 ADR.OR.F.045(b)(2) and GM1 ADR.OR.F.045(b)(2) Management system

These amendments introduce and broadly explain the 'just culture' concept and provide a reference to Regulation (EU) No 376/2014, where more information and guidance can be found.

*AMC1 ADR.OR.D.005(b)(11) and AMC2 ADR.OR.D.005(b)(11) Management system**AMC1 ADR.OR.D.015(c) Personnel requirements*

These amendments were adopted in order to:

- increase the understanding of the industry stakeholders about the expected structure of their management system in relation to compliance monitoring;
- remove a part of the AMC text that is now part of an IR;
- allow for the function of the compliance monitoring to be assigned to the same person that is assigned with the management of the safety management system, in line with requests from several stakeholders and in order to align with point (b)(1) within AMC1 ADR.OR.D.005(b)(11), where the combination is allowed under certain conditions.

¹⁷ Regulation (EU) No 376/2014 of the European Parliament and of the Council of 3 April 2014 on the reporting, analysis and follow-up of occurrences in civil aviation, amending Regulation (EU) No 996/2010 of the European Parliament and of the Council and repealing Directive 2003/42/EC of the European Parliament and of the Council and Commission Regulations (EC) No 1321/2007 and (EC) No 1330/2007 (OJ L 122, 24.4.2014, p. 18) (<http://data.europa.eu/eli/reg/2014/376/oj>).

AMC1 ADR.OR.D.017(h) and GM1 ADR.OR.D.017(h) Training and proficiency check programmes

The amendment of the AMC was adopted in order to allow for the assessment of own instruction, courses or material under specific conditions. This amendment is based on requests from several stakeholders and on the fact that at the time the amendment was proposed the Agency had received and positively assessed 11 alternative means of compliance (AltMoC) regarding the combination of the roles of instructor and assessor for own training. The new GM proposes a method to ensure that these conditions are satisfied.

*AMC1 ADR.OR.D.027(a);(b)(2), AMC2 ADR.OR.D.027(a);(b)(2), AMC1 ADR.OR.D.027(d)(1);(d)(2), AMC2 ADR.OR.D.027(d)(1);(d)(2) Safety programmes and aerodrome safety committees**AMC1 ADR.OR.D.027, GM1 ADR.OR.D.027 and GM2 ADR.OR.D.027 Safety programmes*

The Manoeuvring Area/Apron Safety Committee and the Local Runway Safety Team (LRST) are important tools for the aerodrome operator to enhance operational safety and specifically runway safety. The compositions and the tasks of the Committee and the LRST have been transferred from GM to AMC, so as to ensure that they are taken into consideration.

Furthermore, the current AMC1 ADR.OR.D.027 is deleted because part of its text has been transferred to the revised point ADR.OR.D.027 and to other AMC.

*AMC1 ADR.OPS.B.011(a), AMC1 ADR.OPS.B.011(b), GM1 ADR.OPS.B.011, GM2 ADR.OPS.B.011 and GM3 ADR.OPS.B.011 Removal of disabled aircraft**GM5 ADR.OPS.B.005(a) Aerodrome emergency planning*

During the ICAO Universal Safety Oversight Audit Programme (USOAP) to EASA it was identified that there was no regulatory requirement for the removal of disabled aircraft, in accordance with the recommendation contained in Chapter 9 of ICAO Annex 14. Although the removal of disabled aircraft is not a safety-critical issue, the absence of any related arrangements has an impact on the regularity of operations at the aerodrome. The new AMC refer to the obligation of the aerodrome operator to take into account the characteristics of the aircraft normally expected to operate at the aerodrome, when compiling the removal plan, and define the means through which the involvement and coordination of all necessary stakeholders and the availability of equipment and personnel is achieved.

The related GM offers guidance, by providing more information on the purpose of the removal plan, its outline and the ways it can be tested.

AMC1 ADR.OPS.B.070, AMC2 ADR.OPS.B.070, AMC3 ADR.OPS.B.070, AMC4 ADR.OPS.B.070, GM1 ADR.OPS.B.070, GM2 ADR.OPS.B.070, GM3 ADR.OPS.B.070, GM4 ADR.OPS.B.070, GM5 ADR.OPS.B.070, GM6 ADR.OPS.B.070, AMC1 ADR.OPS.B.070(c)(1), AMC1 ADR.OPS.B.070(c)(2), AMC1 ADR.OPS.B.070(c)(3), GM1 ADR.OPS.B.070(c)(3), AMC1 ADR.OPS.B.070(c)(5), AMC1 ADR.OPS.B.070(c)(6), AMC1 ADR.OPS.B.070(d), GM1 ADR.OPS.B.070(d) and GM2 ADR.OPS.B.070(d) Aerodromes works safety

The AMC are based on provisions contained in Chapter 4 (Work in progress) of ICAO Doc 9981 'PANS-Aerodromes' and its Appendix 1.

Furthermore point (b) of AMC1 ADR.OPS.B.070(c)(2) clarifies that regular maintenance works may be covered by a general safety assessment pertaining to the respective maintenance activity.

AMC1 ADR.OPS.B.070(c)(5) consolidates the previously adopted AMC2 ADR.OPS.B.070, AMC3 ADR.OPS.B.070 and AMC4 ADR.OPS.B.070. In addition, it elaborates further on the content of the procedure for worksite establishment and return to operational use.

The previously adopted GM5 ADR.OPS.B.070 is renumbered as GM1 ADR.OPS.070(c)(5) offering more clarity as to which part of the implementing rule it is related, and GM1 ADR.OPS.B.070(d) and GM2 ADR.OPS.B.070(d) are introduced that provide guidance to the aerodrome operators regarding the risks and the geometrical characteristics of the safety zone during reduced runway length operations.

The previously adopted AMC1 ADR.OPS.B.070, AMC2 ADR.OPS.B.070, AMC3 ADR.OPS.B.070, AMC4 ADR.OPS.B.070, GM1 ADR.OPS.B.070, GM2 ADR.OPS.B.070, GM3 ADR.OPS.B.070, GM4 ADR.OPS.B.070, GM6 ADR.OPS.B.070 are deleted, since their content has been either shifted to the IR and the currently adopted AMC or rearranged among the current GM.

AMC1 ADR.OPS.B.071(a), GM1 ADR.OPS.B.071(a)(2), AMC1 ADR.OPS.B.071(d) Closed runways and taxiways, or parts thereof

The provisions contained in the AMC and GM to the newly adopted point ADR.OPS.B.071 were previously part of CS-ADR-DSN. However, it was determined that they contained regulatory material related to the aerodrome operation rather than the aerodrome design. In order to achieve consistency between the regulatory material issued by the Agency, these provisions were shifted from CS-ADR-DSN to the above-mentioned AMC and GM.

AMC1 ADR.OPS.B.090(b), GM1 ADR.OPS.B.090, GM2 ADR.OPS.B.090 and GM3 ADR.OPS.B.090 Use of the aerodrome by aircraft exceeding the certified design characteristics of the aerodrome

AMC3 ADR.OR.E.005 Aerodrome manual

AMC2 ADR.OR.F.095 Management system manual

GM1 ADR.AR.C.035(d) and GM1 ADR.AR.C.035(e) Issuance of certificates

GM1 ADR.OR.B.040(a);(b) Changes

After the adoption by ICAO of the new definition of the code letter component of the reference code, the outer main gear wheel span (OMGWS) was not taken into account in defining the code letter of an aeroplane. Under specific circumstances this could lead to the use of an aerodrome by an aircraft exceeding the certified design characteristics of that aerodrome. With the adoption of Delegated Regulation (EU) 2024/1400 the wording of point ADR.OR.B.090 was amended in order to include all the certified design characteristics of the aircraft that use or are planned to use any specific aerodrome. The AMC and GM to point ADR.OPS.B.090 provide the means and the guidance necessary to the aerodrome operators to identify such cases and assess the use of their aerodrome by an aircraft having design characteristics exceeding the certified design characteristics of the aerodrome.

The AMC related to points ADR.OR.E.005 and ADR.OR.F.095 were amended as a result of the above-mentioned amendment, in order for the aerodrome manual and the manual of the apron management service provider to make use of the updated wording.

The GM related to points ADR.AR.C.035(d) and (e) and ADR.OR.B.040 was amended, in order to align the terms used within (a) the terms of the certificate and (b) the changes requiring prior approval with

the new wording used for the approval of operations of aircraft exceeding the certified design characteristics of an aerodrome.

GM1 ADR.OPS.B.095(b) and GM2 ADR.OPS.B.095(b) Hot spots

AMC2 ADR.OR.D.027 and GM3 ADR.OR.D.027 Safety Programmes

AMC2 and GM3 to point ADR.OR.D.027 are deleted, because the AMC text has been transferred to the new point ADR.OR.B.095, increasing its visibility and ensuring its enforcement, whereas the GM has been split between: (a) the newly adopted definition of ‘hot spot’ in the Delegated Regulation (EU) 2024/1400, (b) GM1 ADR.OPS.B.095(b) and (c) GM2 ADR.OPS.B.095(b).

GM1 ADR.OPS.B.100(a), GM2 ADR.OPS.B.100(a) and AMC1 ADR.OPS.B.100(b)(5) Suspension of runway operations and runway closure

After the adoption of the new point ADR.OPS.B.100 through Delegated Regulation (EU) 2024/1400, the above-mentioned AMC and GM are adopted. Similarly to the IR, all three are based on Attachment C to Chapter 8 (Runway Safety) of ICAO Doc 9981 ‘PANS-Aerodromes’ and ensure harmonisation of the EASA regulatory material with that of ICAO.

AMC1 ADR.OPS.C.011 and GM1 ADR.OPS.C.011 Overload operations

The AMC is based on the content of Attachment A, Section 20 in ICAO Annex 14 Volume I and on part of the already existing GM under point ADR.OPS.C.011. In particular, the overload criteria previously contained in the GM are transposed to AMC level, so as to ensure their application.

The amendments to the regulatory material are intended to become applicable as follows:

On the day following the publication of the ED Decision

- GM1 ADR.AR.B.010 Allocation of tasks to qualified entities
- AMC1 ADR.AR.C.015(b) Initiation of the certification process
- AMC1 ADR.OR.D.005(b)(11) and AMC2 ADR.OR.D.005(b)(11) Management system
- AMC1 ADR.OR.D.015(c) Personnel requirements
- AMC1 ADR.OR.D.017(h) and GM1 ADR.OR.D.017(h) Training and proficiency check programmes
- AMC3 ADR.OR.E.005 Aerodrome manual (Part related to Section 6.2.)
- AMC1 ADR.OPS.D.080(a)(2);(b)(2)(i) Training and proficiency check programme of marshallers and ‘FOLLOW-ME’ drivers

On the day Implementing Regulation (EU) 2024/894 becomes applicable (20 March 2025)

- AMC1 ADR.AR.A.025(b) Information to the Agency

On the day Delegated Regulation (EU) 2024/1400 becomes applicable (24 May 2025)

- GM1 4a [Aerodrome] traffic density
- GM1 ADR.AR.C.035(d) and GM1 ADR.AR.C.035(e) Issuance of certificates
- GM1 ADR.OR.B.040(a);(b) Changes
- AMC1 ADR.OR.C.030 and AMC2 ADR.OR.C.030(a) Occurrence reporting

- AMC1 ADR.OR.D.005(b)(2), GM1 ADR.OR.D.005(b)(2), AMC1 ADR.OR.F.045(b)(2) and GM1 ADR.OR.F.045(b)(2) Management system
- All the AMC & GM related to point ADR.OR.D.027 Safety programmes and point ADR.OR.D.030 Safety-reporting system
- AMC3 ADR.OR.E.005 Aerodrome manual (Parts related to (Sub)Sections 2.2.8, 2.5 and 28)
- AMC2 ADR.OR.F.095 Management system manual
- GM5 ADR.OPS.B.005(a) Aerodrome emergency planning
- All the AMC & GM related to point ADR.OPS.B.011 Removal of disabled aircraft
- GM1 ADR.OPS.B.030(a) Surface movement guidance and control system
- All the AMC & GM related to point ADR.OPS.B.070 Aerodrome works safety
- All the AMC & GM related to point ADR.OPS.B.071 Closed runways and taxiways, or parts thereof
- All the AMC & GM related to point ADR.OPS.B.090 Use of the aerodrome by aircraft exceeding the certified design characteristics of the aerodrome
- All GM related to point ADR.OPS.B.095 Hot spots
- All the AMC & GM related to point ADR.OPS.B.100 Suspension of runway operations and runway closure
- All the AMC & GM related to point ADR.OPS.C.011 Overload operations

It must be noted at this point that the present Decision does not contain part of the rulemaking material that was proposed through NPA 2020-10. In particular:

- The material related to the aeronautical data (AMC1 ADR.OPS.A.005 and all the AMC & GM to points ADR.OPS.A.080 till ADR.OPS.A.115) are to be addressed by a separate rulemaking task (RMT.0722). All the submitted comments on the proposed amendments have been noted and will be taken into account in this future RMT.
- The material related to the deletion of parts of the CS & GM (CS ADR-DSN.R.855, CS ADR-DSN.R.870 and GM ADR-DSN.R.870), based on their inclusion in Part-ADR.OPS and related AMC & GM will be published after the applicability date of Delegated Regulation 2024/1400, in a new Issue of the CS-ADR-DSN under RMT.0591. At the same time, a small number of secondary amendments proposed in NPA 2020-10 and during the second focused consultation will also be published.
- The material related to the Pavement Classification Number will be included in a future amendment of the regulatory material, at the same time with the adoption of the corresponding amendments to Regulation (EU) 2017/373 through the ongoing RMT.0719 in order to ensure legal certainty, to avoid contradicting information between Regulation (EU) 2017/373 and Regulation (EU) No 139/2014, and to harmonise the applicability dates.

2.4. What are the stakeholders' views

The comments received and the EASA responses to them are presented in Comment-Response Document (CRD) 2020-10 Part 2 (RMT.0591), and in CRD 2016-19 'Alignment of EASA Basic Regulation (Regulation (EU) 2018/1139) with the specific obligations stemming from Regulation (EU) No 376/2014' (RMT.0681), and the main ones are summarised below. Additionally, the comments received during the focused consultation are also presented.

2.4.1. Regular update of the aerodrome rules (RMT.0591)

During the public consultation of NPA 2020-10 'Regular update of aerodromes rules' (RMT.0591), 108 comments were submitted via the Comment-Response Tool (CRT) on the proposed amendments to AMC and GM. Regarding the AMC & GM to Part-ADR.AR and Part-ADR.OR, the majority of the comments (64 %) was submitted by national competent authorities (NCAs), whereas organisations representing aerodromes and aerodrome operators submitted most of the comments (63 %) regarding the AMC & GM to the Part-ADR.OPS.

A mixture of comments has been submitted to all parts of NPA 2020-10 'Regular update of aerodromes rules' supporting the proposed amendments or proposing improvements or changes to them. No comments expressing disagreement with the proposals have been recorded. The individual responses to the comments that are related to the present Decision are provided in Part 2 of CRD 2020-10.

The comments submitted during the public consultation of NPA 2020-10 focused mainly on the following topics:

Safety programmes and aerodrome safety committees (related to point ADR.OR.D.027)

Several comments were related to the composition of the safety committees and the LRST. In particular, the comments expressed the need for the wildlife management team to be included also in the composition of the LRST through an AMC — rather through GM — and for the removal of the vehicle drivers, based on the argument that their number within the LRST would be too large. Both comments were accepted, and the initial AMC were amended.

Aerodrome works safety (related to point ADR.OPS.B.070)

The largest number of comments was received in relation to the AMC and GM to point ADR.OPS.B.070, which is extensively rewritten. About 43 % of these (9 out of 21) are explicit comments that the amendments and additions are supported. In the rest 12 of them, no disagreement has been expressed, however improvements of the texts were suggested and a number of them was accepted fully or partially.

Use of the aerodrome by aircraft exceeding the certified design characteristics of the aerodrome (related to point ADR.OPS.B.090)

Several comments were received regarding the new regulatory material on the use of the aerodrome by aircraft exceeding the certified design characteristics of the aerodrome. No stakeholder expressed opposition to the new regulatory material. Most of the comments proposed amendments improving the text and its coherence with related ICAO material. More than half of them were accepted or partially accepted and the AMC and GM were amended accordingly.

Hot spots (related to point ADR.OPS.B.095)

The proposals for the AMC & GM about the designation of hot spots has been supported. EASA received only two comments on this issue regarding improvements of the proposed texts, one of which was accepted.

2.4.2. Alignment of the aerodrome rules with Regulation (EU) No 376/2014 on the reporting, analysis and follow-up of occurrences in aviation (RMT.0681)

In relation to NPA 2016-19 'Alignment of implementing rules and acceptable means of compliance/guidance material with Regulation (EU) No 376/2014 — Occurrence reporting' (RMT.0681), EASA received via the CRT a total of 52 comments on the proposed amendments to the AMC and GM to the Part-ADR.AR and Part-ADR.OR from interested parties, including NCAs, organisations representing aerodromes and aerodrome operators. As far as the AMC and GM to Part-ADR.OR are concerned, almost all comments (8 out of 9) were submitted by NCAs, whereas 58 % of the comments related to the AMC & GM to Part-ADR.OR were submitted by organisations representing aerodrome operators.

Safety reporting system (related to point ADR.OR.D.030)

A significant number of comments were made by the aerodromes community regarding AMC1 ADR.OR.D.030 'Safety reporting system'. In response to specific comments, EASA reviewed the AMC provision specifying that aerodrome operators should establish arrangements with all organisations operating or providing services at the aerodrome that define their reporting obligations under the safety-reporting system of the aerodrome operator. In particular, the need for written arrangements was removed, as this was found too stringent and creating unnecessary administrative burden in particular to operators of large aerodromes.

Occurrence reporting (related to point ADR.OR.C.030)

A small number of comments was received also in relation to AMC1 ADR.OR.C.030. In particular, the comments were related to the need: (a) to amend also AMC3 ADR.OR.E.005 so that the Aerodrome Manual includes the proposed amendments and (b) to add an explicit reference to Regulation (EU) 2015/1018¹⁸. Both sets of comments were accepted and adopted into the final regulatory material.

2.4.3. Additional items for which a focused consultation was performed with the Advisory Bodies for Aerodromes (ADR TeB and TEC) (8-23 November 2022)

During the focused written consultation with the ADR TeB and TEC members on the additional items to those included in NPA 2020-10 'Regular update of aerodromes rules' (RMT.0591), EASA received a total of 25 comments on the AMC and GM. The majority of the comments (76 %) was submitted by NCAs, while the rest (24 %) was submitted by organisations representing aerodromes.

¹⁸ Commission Implementing Regulation (EU) 2015/1018 of 29 June 2015 laying down a list classifying occurrences in civil aviation to be mandatorily reported according to Regulation (EU) No 376/2014 of the European Parliament and of the Council (OJ L 163, 30.6.2015, p. 1) (http://data.europa.eu/eli/reg_impl/2015/1018/oj).

Combination of the roles of the safety manager and the compliance monitoring manager

In general, all comments received on this issue were positive and only a small number of rephrasing requests were made that were accepted apart from one rephrasing proposal that would alter the meaning of the relevant AMCs and was not accepted.

Combination of the roles of the instructor and assessor

All comments received on this issue were positive and only a small number of rephrasing requests were made that were accepted.

2.4.4. Additional items for which a focused consultation was performed with the Advisory Bodies for Aerodromes (ADR TeB and ADR.CSTG) (11-25 April 2024)

During the focused written consultation with the ADR TeB and ADR.CSTG members on the additional items that were requested, the Agency received one comment that was partially accepted and will be taken into account in future RMTs.

3. What are the expected benefits and drawbacks of the regulatory material

The expected benefits and drawbacks of the regulatory material that is related to the IRs proposed with Opinion No 04/2023 are identical to the ones presented in Section 2.5 of that Opinion.

In addition, the amendments to the AMC and GM that are not related to the IRs allow for the combination of: (a) the functions of the safety management and compliance management and (b) the roles of aerodrome operator instructor and assessor into one person, under specific conditions. This will allow for a more efficient use of the aerodrome operators' (personnel) resources and eliminate the need for the submission of AltMoC in relation to these issues, as has been the case till now. No drawbacks are expected.

Finally, the amendments that were put under discussion during the second round of focused consultation, are primarily related to corrections of the previously adopted regulatory material and secondarily to the addition of GM to a newly adopted definition. In this way, the benefits are expected to be the increased consistency and clarity of the regulatory material and no drawbacks are identified.



4. Monitoring and evaluation

The regulatory material presented here will support the application of the amendments to Regulation (EU) No 139/2014. EASA will monitor whether the objectives of it will be achieved as part of the monitoring and evaluation actions described in Chapter 3 of EASA Opinion No 04/2023.



5. Proposed actions to support implementation

The regulatory material adopted through this Decision will support the application of the amendments to Regulation (EU) No 139/2014.

EASA will support the implementation of the regulatory material contained in the Decision through the following actions:

- Focused communication in preparation for and during Advisory Body meetings (MAB/SAB/TeB/ADR.COMM)
- Clarifications via electronic communication tools between EASA and NCAs
- Detailed explanations / clarifications on the EASA website through the FAQ webpage, if considered necessary for specific provisions



6. References

- ICAO Annex 14 to the Convention on International Civil Aviation, Aerodromes, Volume I 'Aerodrome Design and Operations', 9th Edition, July 2022, Amendment 17
- ICAO Doc 9981, Procedures for Air Navigation Services — Aerodromes', 3rd Edition, 2020, Amendment 4
- EASA SIB 2020-17 'Higher Code Letter Operations', issued on 25 September 2020

