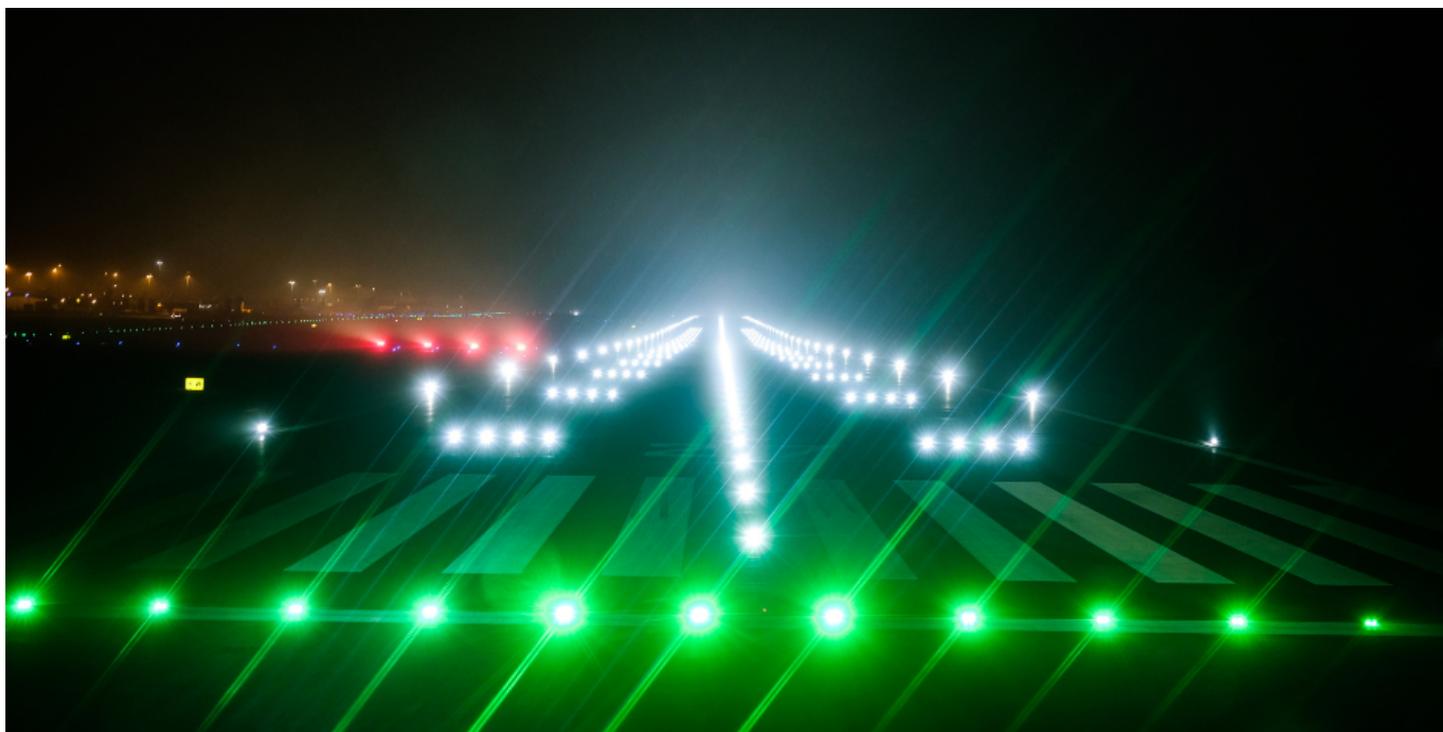


## Introducing these questions and answers.....

These Event Q&A are provided as a follow up from the Runway Safety Webinar on 4 November 2021.



### Question 1 - Winter Ops

**According to EU2020/2148: "“specially prepared winter runway” means a runway with a dry frozen surface of compacted snow or ice, or both, which has been treated with sand or grit or has been mechanically treated to improve runway friction". Does this mean that an airport that does not receive approval for SPWR cannot mechanically treat it's runway, as in no use of snowblowers or plough trucks since by definition it is a mechanical removal of contaminants?**

All answers related to the Global Reporting Format (GRF) and in particular to specially prepared winter runways are available in our webinar from March 2021 on the GRF. The link for this webinar with all presentations and Q&A. is the following [document on the EASA Website](#).

### Question 2 - ISO and the Rules 1

**AMC1 ADR.OR.D.007(b) talks about ISO17799:2202 and ISO 28000:2007, but the first one is not anymore valid since 2010; additionally our consultant says the ISO 28000 is very difficult to adopt as it is normally meant for different business (supply chain and logistic). they suggest adopting the ISO 27001. Could you confirm?**

ISO 17799:2202 is superseded by ISO/IEC 27002:2013 which may be used.

### **Question 3 - ISO and the Rules 2**

**It is unclear if any ISO certificates are binding or not in order to be compliant with the regulation. We have not agreed yet on a common understanding so far. Please clarify AMC1 ADR.OR.D.007(b) (a)(2).**

The AMC provides one method to comply with the Implementing Rule. Other methods maybe used provided that they meet the objective of the rule, i.e., the use of alternative means of compliance.

### **Question 4 - Aeronautical data**

**The rules on Aeronautical data are clear, although are there examples or standards on how to get compliant with them or acceptable means to use or to implement (software or other)?**

The question is unfortunately not clear to provide an answer.

### **Question 5 - Access to the movement area 1**

**Is it correctly understood that personnel involved in the operation of the aerodrome in ADR.OPS.B.003 a) does not include personnel of other organizations that operate or provide services at the aerodrome, allowed unescorted access to the movement area and other operational areas of the aerodrome which are explicitly addressed in ADR.OPS.B.003 b)?**

ADR.OPS.B.003 refers to aerodrome operator personnel and personnel of organizations which are conducting activities on behalf of aerodrome operator, e.g. maintenance.

### **Question 6 - Access to the movement area 2**

**For persons temporarily acceding to the movement area with a vehicle under an escort is it mandatory for the Aerodrome operator to authorize them in writing to drive in the movement area or is the temporary permit per the person considered compliant?**

According to AMC1 ADR.OPS.B.024(d) the temporary permit should specify the validity period and areas in which the driver is allowed to operate. How this will be implemented is up to the aerodrome operator.

### **Question 7 - Access to the movement area 3**

**Should the second sentence of the ADR.OPS.B.027 c)2) be interpreted literally or it may be interpreted that instead of an entry to a runway or a runway strip a further specific authorisation by the air traffic services is to be required for an entry to an area controlled by a respective air traffic services unit, e.g. before entering areas specified in ADR.OPS.B.027 e) or corresponding to areas established for safeguarding of ILS which need not to coincide with an edge of a runway or runway strip?**

The general rule is that authorization by the air traffic services is required before entering the manoeuvring area. However, entering the runway or a runway strip requires a further authorization. Point (e) is a general prohibition to operate in these areas when the runway is in use.

### **Question 8 - Access to the movement area 4**

**"Q. 1: Was it specifically meant that the ADR.OPS.B.026 e)2) should waive the ADR.OPS.B.080 a) requirement only for vehicles that will be granted a temporary permit? I.e. is it to be understood that other mobile objects on the manoeuvring area shall comply with the marking and lighting requirements of point ADR.OPS.B.080 even when they are granted a temporary permit?"**

**Q. 2: What is the key difference between ADR.OPS.B.027 g)4) and g)6) with respect to the emergency vehicles? Was the g)6) aimed at ensuring that a driver of an unengaged emergency vehicle on the apron shall give way to emergency vehicles responding to an emergency? Which aspect of a driver of an emergency vehicle which is not engaged in an emergency (e.g. due to being unserviceable vis-a-vis ADR.OPS.B.010) is not covered by g)4)?**

**Q. 3: Should the second sentence of the ADR.OPS.B.027 c)2) be interpreted literally or it may be interpreted that instead of an entry to a runway or a runway strip a further specific authorisation by the air traffic services is to be required for an entry to an area controlled by a respective air traffic services unit, e.g. before entering areas specified in ADR.OPS.B.027 e) or corresponding to areas established for safeguarding of ILS which need not to coincide with an edge of a runway or runway strip?"**

In regard to Q1, indeed the vehicles which are granted a temporary permit are exempted from the requirements of ADR.OPS.B.080 provided that the escorting vehicle meets the requirements. Other mobile objects are not exempted.

In regard to Q2 RFFS vehicles are normally positioned in the fire station and are meant to move for operational reasons either to respond to an emergency or to safeguard a refuelling, if requested. For these reasons the RFFS vehicles should be given priority over all vehicular traffic. The objective of the regulation is to ensure that RFFS vehicles are given priority when they are moving for operational reasons. All other cases may be covered through local procedures.

In regard to Q3 the general rule is that authorization by the air traffic services is required before entering the manoeuvring area. However, entering the runway or a runway strip requires a further authorization. Point (e) is a general prohibition to operate in these areas when the runway is in use.

### **Question 9 - Access for vehicles**

**Was it specifically meant that the ADR.OPS.B.026 e)2) should waive the ADR.OPS.B.080 a) requirement only for vehicles that will be granted a temporary permit? I.e. is it to be understood that other mobile objects on the manoeuvring area shall comply with the marking and lighting requirements of point ADR.OPS.B.080 even when they are granted a temporary permit?**

ADR.OPS.B.026 refers to vehicles only. ADR.OPS.B.080 has a wider scope and covers all the mobile objects.

### **Question 10 - Markings for vehicles**

**Does ADR.OPS.B.026 e)1) imply that any vehicle regularly used on aprons (e.g. tow tractor) should be marked by colors or flags whenever escorted on the maneuvering area?**

The referenced rule for the marking of vehicles is ADR.OPS.B.080 where the rule requires the vehicles to be marked either by use of conspicuous colours, or display at suitable locations, flags of appropriate size, chequered pattern and contrasting colours. So, the use of flags may not be appropriate for tow tractors and one of the other methods may be used.

### **Question 11 - Escorted vehicles in LVP**

**OPS.B.026 : for escorted vehicles with LVP in force (snow removal trucks) and not equipped with transponder, the radio need to ensure coms with ATS or with the convoyer in com himself with ATS?**

The rule does not allow the operation of vehicles on the manoeuvring area which are not fitted with transponder, if the aerodrome uses a surveillance system that requires the use of transponder or without radio during LVP. It is acknowledged that in many cases snow removal is conducted under LVP, however the rule does not address satisfactorily this case which is based on a clear operational need to keep the runway(s) open to the traffic. EASA will review the issue.

### **Question 12 - Temporary vehicles under LVP**

**Under ADR.OPS.B.026 it is no longer possible to allow temporary vehicles under LVP conditions, even when escorted. How are we supposed to allow external service providers (eg. external company working on the airfield lighting systems) during LVP even when they are escorted?**

Construction or maintenance activities are not allowed to take place in the proximity of aerodrome electrical systems when low-visibility procedures are in effect at the aerodrome (see ADR.OPS.C.015 point (e)).

### **Question 13 - Emergency Vehicles**

**What is the key difference between ADR.OPS.B.027 g)4) and g)6) with respect to the emergency vehicles? Was the g)6) aimed at ensuring that a driver of an unengaged emergency vehicle on the apron shall give way to emergency vehicles responding to an emergency? Which aspect of a driver of an emergency vehicle which is not engaged in an emergency (e.g. due to being unserviceable vis-a-vis ADR.OPS.B.010) is not covered by g)4)?**

RFFS vehicles are normally positioned in the fire station and are meant to move for operational reasons either to respond to an emergency or to safeguard a refuelling, if requested. For these reasons the RFFS vehicles should be given priority over all vehicular traffic. The objective of the regulation is to ensure that RFFS vehicles are given priority when they are moving for operational reasons. All other cases may be covered through local procedures.

### **Question 14 - Authorisation of drivers 1**

**Concerning "Authorisation of vehicle drivers" ADR.OPS.B.024 could you confirm if the driving license is meant to be released by the Training Manager, by the Operation Nominated Person (responsible for the airside activities), or it is acceptable any of them ?**

The rule requires the aerodrome operator to issue the driving authorization, however the decision on who is responsible to sign the authorization is on the aerodrome operator. The important thing is to ensure that the conditions for the issuance of the driving authorization included in ADR.OPS>b.024 are met.

### **Question 15 - Authorisation of drivers 2**

**Last question about "AMC1 ADR.OPS.B.024(b) Authorisation of vehicle drivers" , could you specify what is meant with the words " ..if relevant" night practical training ?**

This covers the case where the aerodrome is not operating at night, therefore a practical training during the night may not be appropriate.

### **Question 15 - Authorisation of drivers 3**

**According to AMC1 ADR.OPS.B.024(b) Authorisation of vehicle drivers a drivers authorisation can only be handed out after completion of the practical training. This implies that temporary authorisations need to be handed out?**

The question is not clear, however authorization of the vehicle driver is issued upon completion of the relevant training programme and has demonstrated competence.

### **Question 16 - Pedestrians and call-signs**

**Shall pedestrians have a call-sign too? It seems logical when they are into the maneuvering area?**

Normally call signs are related to aircraft and vehicles.

### **Question 17 - Signs and markings**

**Is EASA investigating potential regulatory measures to develop detailed rules for the maintenance of manoeuvring area signs (and for markings as well) that allow aerodrome operators to accomplish ADR.OPS.C.015(d), and additionally AMC1 ADR.OPS.C.015(d);(f) and GM1 ADR.OPS.C.015(d); and accomplish as well the GAPPRE recommendation ADR3 b) “An appropriate method for the inspection and assessment of markings deterioration should be implemented”, also mentioned in APPENDIX E GUIDANCE AND EXPLANATORY MATERIAL FO**

The Regulation sets the objectives of the maintenance programme and the related AMC and GM refer to the frequency of inspections and what is expected to be checked. EASA does not intend to provide specific methods which are used for the inspections.

### **Question 18 - Towing of aircraft**

**With regards to ADR.OPS.B.028 Towing of aircraft it is correct in saying that ACL always need to be shown day and night (as stated in SERA.3215)?**

This is correct.

### **Question 19 - Lights for towed aircraft**

**About ADR.OPS.B.028 - "ensure that towed aircraft display lights during towing operations, in accordance with the provisions of point SERA.3215 of the Annex to Commission Implementing Regulation (EU) No 923/2012;" how the aerodrome operator could ensure that?**

This could be done through the towing procedure and could also be published in the AIP.

### **Question 20 - SERA**

**About Reg UE 923/2012 "SERA" is it possible to know which SERA requirements are to be adopted by ADR ?**

The question is not clear; however the aerodrome operator should review Reg (EU) 923/2012 and identify the rules which are applicable to them.

### **Question 21 - Applicability for pilots**

**Does the ADR.OPS.B.033 article applies to pilots ? In other words, could you tell us if pilots making their plane check before leaving the airport have to be trained according to point (2) (a) ADR.OPS.B.033 which is making reference to ADR.OR.017 ? It seems quite hard to put this part in place especially for pilots who are not based on the airport.**

Flight crews, when exercising their duties, which includes also the walk-around are not subject to ADR.OPS.B.033.

### **Question 22 - Private pilots**

**For areas which are isolated from the commercial part (example given : an area dedicated to private pilots), does the ADR.OPS.B.033 article applies to pilots operating from the area or to personnel working in this area ?**

The rule applies to any part of the movement area and does not differentiate between the commercial and business or general aviation. The rule applies to personnel working on these areas and it is not reasonable to apply this requirement to pilots.

### **Question 23 - Application of the regulations**

**Has EASA considered to give more time to MS, respectively airports, in order to implement the huge runway safety regulation in regard to the heavy consequences of the pandemic airports are facing now (human & financial) ? I would rather have more time to implement the rules than to "loose" time to do AltMoc.**

EASA does not decide on when the regulation will apply. The applicability dates have been set by European Commission in agreement with the States.

### **Question 24 - Training/ Airside safety courses**

**For the Airside Safety courses (allowing people to operate unescorted in airside), which kind of practical training has to be performed?**

The practical training depends on the subject and needs to complement the theoretical training.

### **Question 25 - Training for RFFS and maintenance personnel**

**Training program and proficiency check programs: How do we deal with personnel that are both RFFS personnel and maintenance personnel? Is it 12 months for RFFS and 24 months for the rest of the duty.**

Aerodrome personnel needs to be trained and competent on the tasks they perform. The frequency of the different trainings is established in ADR.OPS.D.017 point (f) and the frequency of the proficiency checks in point (g) of the same rule. In general, recurrent training is taking place every 24 months for all personnel, however for RFFS the period between two consecutive proficiency checks is 12 months.

### **Question 26 - Training marshallers and drivers**

**ADR.OPS.D.080 Training and proficiency check programmes of marshallers and "FOLLOW-ME" drivers is there a reason why the proficiency element is every 12 months? and also where Marshalling is delegated to Ground Handling providers, is the aerodrome operator required to provide the training and monitor their compliance/competency?**

FOLLOW ME drivers and marshallers are providing directly instructions to the flight crew, therefore they have a direct effect on the flight safety. Due to this criticality, proficiency checks have been set to every 12 months. In regard to their training, the aerodrome operator is responsible to ensure that the requirements are met, i.e., training syllabus, frequency, qualification of instructors and assessors. This does not necessarily mean that the training must be provided by the aerodrome operator.

### **Question 27 - Flight checks 1**

**"Regarding AMC1 ADR.OPS.C.015(b);(f) it is stated that: ""FLIGHT CHECKS**

**(d) As part of the maintenance programme of the lighting systems, flight check of the approach, runway and taxiway lighting systems, VASIS, aerodrome beacon....."". We are confused by the need and scope of flight checks for TWY lightning. are we only speaking about some particular TWYs? usually TWYs are not overflown, do this refer to on-ground, taxiing checks from the cockpit?. thanks in advance for the clarification**

Flight checks of taxiway lighting system are conducted to ensure that the pattern has not changed.

## **Question 28 - Flight checks 2**

**"AMC1 ADR.OPS.C.015 (b);(f), par. (d) - FLIGHT CHECKS#:**

**„As part of the maintenance programme of the lighting systems, flight check of the approach, runway and taxiway lighting systems, VASIS, aerodrome beacon, and the light intensity control system should be carried out at regular intervals, at least on a yearly basis, to ensure that the pattern is correct and that lights are operating properly....“**

**Q. 1: It is not clear to me the reason for inclusion of TWY lighting system flight check. Also the feasibility of such flight check may be difficult in some areas close to the terminals etc. The requirement for taxiway lighting system to be checked from the air was included neither in the NPA, nor in related CRD."**

The purpose of the flight checks of the taxiway system is to ensure that the pattern has not been changed.

## **Question 29 - Security programme**

**OPS.A.010 Data quality: dose it put further requirements for the security program for the Airport Operator than it is now? what is the difference from existing requirements?**

The updated ADR.OPS.A.010 and introduces in the regulation the data quality requirements in accordance with the aeronautical data catalogue.

## **Question 30 - Taxiway control**

**Please let me know why NPA 2018-14 does not include the provision on the control of taxiways from the air. However, the publication contained this provision.**

Question is not clear

## **Question 31 - Transponder requirements for police vehicles**

**Transponder requirement according to point (a) (4) of ADR.OPS.B.026: do police vehicles operating on the manoeuvring area fall under the scope of this provision? I assume that in most Member States, the CAA is not the Competent Authority for police forces.**

The rule applies to all vehicles operating regularly on the manoeuvring area of the aerodrome where surveillance requires the use of a transponder. If the vehicle is not fitted with a transponder or any other equipment supporting surveillance, then point (e) of ADR.OPS.B.026 applies.

## **Question 32 - FOD1 Analysis**

**The AMC states that all FOD identified and collected on the aerodrome should be recorded, analysed and evaluated. Is there any way to reduce the requirement from "all" to where practicable?**

Refer to definition of the FOD, which FOD are limited to objects that have the potential to be a hazard to aircraft operator. In our view the first step is to define the FOD. In this way not everything that is collected needs to be assessed.

### **Question 33 - FOD 2 Analysis**

**"FOD Prevention – AMC1 ADR.OPS.B.016(c) FOD ANALYSIS – CONTINUOUS IMPROVEMENT: "All FOD" identified and collected on the ADR should be recorded, analysed and evaluated". What does this mean for the use of Sweepers on aerodrome with very large surfaces. Is it necessary to analyze the contents of a sweeper to analyze found objects between absorbed dirt, dust, etc. ?**

Refer to definition of the FOD, which FOD are limited to objects that have the potential to be a hazard to aircraft operator. In our view the first step is to define the FOD. In this way not everything that is collected needs to be assessed.

### **Question 34 - FOD 3 Analysis**

**The query regarding FOD analysis is particularly pertinent with regards to the wording "all FOD". Some CA interpret this to mean that literally all FOD needs to be analysed which is logistically a big challenge and might lead to avoidance of placing FOD in dedicated bins.**

Refer to definition of the FOD, which FOD are limited to objects that have the potential to be a hazard to aircraft operator. In our view the first step is to define the FOD. In this way not everything that is collected needs to be assessed.

### **Question 35 - FOD 4 Analysis**

**When you use big sweepers you will definitely "collect" things that are considered FOD. It is virtually impossible to analyse these items.**

Refer to definition of the FOD, in which FOD are limited to objects that have the potential to be a hazard to aircraft operator. In our view the first step is to define the FOD. In this way not everything that is collected needs to be assessed. However, a reasonable approach should be followed i.e., if there are FOD of the same type in an area there is no need to analyze each piece of FOD.

### **Question 36 - FOD 5 Inspections in LVP**

**Pedestrians might be needed, including when LVP are in force, to proceed to inspections or to collect FOD. Indeed, not all of the concerned areas within the Manoeuvring Area might be accessible to vehicles (read, most of the non-paved areas)... shall we assume it is OK for personnel, even when LVP are in force, to reach a suitable point of access to the Manoeuvring Area by car, park it, and access the Manoeuvring Area by walking? It is all about the notion of what a pedestrian is...**

When LVPs are in force, access to the manoeuvring area must be limited to the essential minimum. Ad hoc inspections for urgent operational reasons may not be discontinued. In such cases the provisions of point (b) in ADR.OPS.B.033 in combination with ADR.OPS.B.027 apply.

### **Question 37 - FOD 6 Training and awareness**

**AMC1 ADR.OPS.B.016(b)(1) about "Foreign object debris control programme" talks about "personnel awareness" and "personnel training". Can we understand that some airside personnel "just" need "awareness" and some other should go up to a "training".**

Point (b)(1) in ADR.OPS.B.016 requires personnel training and demonstration of competence together with awareness. The latter is normally one of the objectives of the training, however awareness can also be increased with other means as well, e.g. safety campaigns.

### **Question 38 - FOD 7 inspections**

**"AMC1 ADR.OPS.B.016(b)(3) Foreign object debris control programme**

**Q1. What is the meaning of "periodic" inspection?**

**Q2 How do you expect the implementation of FOD inspection on "foot" on such large airport movement areas?**

**AMC1 ADR.OPS.B.016(c) Foreign object debris control programme**

**Q1. Would the expectation here be, that all FOD bins are analyzed for the FODs mentioned in the GM1 ADR.OPS.B.016(c)?**

**We wonder what an analysis of pet bottles and pens will achieve.**

**ADR.OPS.028 «aircraft towing» / SERA.3215 «Lights to be displayed by aircraft»:**

**The SERA.3215 article has caused some confusion.**

**Q1. Can you please summarise how towed aircraft must be lighted at day and night?"**

The term 'periodic' means at regular intervals. EASA does not specify how often inspections should be conducted. It is the responsibility of the aerodrome operator to decide on the frequency based on different parameters, for example traffic density, weather conditions, size of the aprons ,etc. The inspection on foot is very common for grass areas or areas which are not accessible by car.

In regard to AMC1 ADR.OPS.B.016(c), please refer to definition of the FOD, in which FOD are limited to objects that have the potential to be a hazard to aircraft operator. In our view the first step is to define the FOD. In this way not everything that is collected needs to be assessed.

In regard to SERA.3215 all aircraft during tow shall display anti-collision lights during day and night and additionally lights to indicate the extremities of the aircraft during night.

### **Question 39 - FOD 8 Programme**

**"AMC1 ADR.OPS.B.016 (c) Foreign object debris control programme**

**The AMC states that all FOD identified and collected on the aerodrome should be recorded, analysed and evaluated. A grid map should be used to record the location of the FOD.**

**The word "all" leaves no room for discussion according to our CA.**

**The practical implication is, that Frankfurt Airport has to develop a procedure of how to make sure that all FOD is assessed / counted / evaluated. This would mean that the content of the FOD bins on the apron has to be screened and documented. Furthermore, the swiping machines have to be checked for its collected FOD. All personnel working on the apron would have to be requested to not only dispose FOD but also to record its exact finding spot.**

**This would result in a very huge effort and high cost, whereas the benefit seems rather low. We also see a potential risk, that the need for documentation of collected FOD leads to the situation that FOD is not disposed at all by ops staff, because the documentation process is too time consuming.**

**This cannot be the purpose of this regulation.**

**Q1. Please suggest a way to dissolve some part of the regulations and elaborate on this.**

Please refer to the definition of the FOD, in which FOD are limited to objects that have the potential to be a hazard to aircraft operator. In our view the first step is to define the FOD. In this way not everything that is collected needs to be assessed. However, a reasonable approach should be followed i.e., if there are FOD of the same type in an area there is no need to analyze each piece of FOD.

### **Question 40 - Language proficiency 1**

**Which is the level of language proficiency required?**

At least operational level.

### **Question 41 - Language proficiency 2**

**Is it mandatory to have proficiency check of local language?**

Language proficiency needs to be demonstrated even for the local language. The criteria are described in point (b) of ADR.OPS.B.029. If a person has demonstrated language proficiency at expert level then there is not any need for re-assessment.

### **Question 42 - Language proficiency 3**

**Good afternoon. Regarding the language proficiency derogation in accordance with ADR.OPS.B.29 (g) - is such derogation/ exemption granted for a specific airport operator or for all airports in the Member State?**

In accordance with point (g) in ADR.OPS.B.029 the exemption may cover one or several aerodromes.

### **Question 43 - Language proficiency 4**

**Is an English language proficiency also required for personnel where English is their first language? Also is the Aerodrome Operator required to monitor the language proficiency of Aircraft Tow operators using Radiotelephony on the aerodrome.?**

Demonstration of language proficiency in English is also required for native English speakers. The criteria are described in point (b) of ADR.OPS.B.029. Once a person has demonstrated competence at expert level then re-assessment is not required.

### **Question 44 - Language proficiency 4**

**Language proficiency: is it mandatory even if the operators don't have to speak on the same radiofrequency of the Pilots, but they have a dedicated frequency with TWR**

Language proficiency is required irrespective of the use of frequencies. Exemption from the English language proficiency requirements is granted upon decision of the State.

### **Question 45 - Runway inspections**

**"AMC2 ADR.OPS.B.015 (c): ... Runway inspections should be conducted in the opposite direction to that being used for landing or taking off and without interruption, unless it is operationally impossible..."**

**Q1. Do You have any examples of conditions making it "operationally impossible" to conduct runway inspections in the opposite direction?**

**Q2. What is the intention of the sentence?**

**Q3. Is the scope of the requirement only the daily routine inspections or all routine and non-routine inspections of the runway, i.e. including inspections of visual aids, surface conditions following snow sweeping, FOD search after bird collisions etc?"**

The term 'operationally impossible' refers to cases for example when the inspection needs to be interrupted due to a landing or take-off or not being conducted in the opposite direction of landing or take-off since runway exits are occupied by aircraft.

The intention of the sentence is to ensure that the inspector has always in site arriving or departing traffic.

The intention is to move, wherever operationally possible, to a direction opposite to landing or take-off.