



Future Aerodrome Safety Rules – the user's view

Philipp Ahrens - Manager Safety, Capacity, Slots, ATM & SES

22 May 2012, EASA Conference on future Aerodrome Safety Rules, Cologne



→ ACI EUROPE Membership

▪ REGULAR MEMBERS:	180
- Number of Airports operated:	405
- Countries:	46
▪ WORLD BUSINESS PARTNERS:	155
▪ National Airport Associations:	8



→ Development of Aerodrome Rules in EASA



2008

High uncertainty
what EU
airports could
expect of EASA
Rules



2010

Path and goal
are clearer –
collaborative
effort



2011

Rules get shape
and structure –
obstacles are
being reduced
and deviations
considered



2012

Suggestions for
improvements
through the
NPA procedure
- Collaborative
efforts



Original goals of ACI EUROPE

- ICAO Annex 14 as baseline – ensure compability
- Do not reinvent the wheel – no overregulation
- No duplication of audits – to limit additional costs
- Sensitive approach with the operating certificates – should not result in closing of aerodromes
- Need for Flexibility – every airport is different
- High level IR's
- Abolishment of horizontal rule structure (AR GEN & OR GEN)
- Respect historically grown infrastructure – allowing for deviations

Achievements

- ICAO Annex 14 is the baseline
- Horizontal rules have been abolished
- Only IR's when BR is not clear enough
- Flexibility through high level IR's
- Acknowledging ICAO developments in the rulemaking process
- Suggestions for conversion periods

Good cooperation with EASA

- Fruitful discussions and exchange of views during the drafting process
- RM Groups have been consulted and asked for their expertise even after the Rulemaking Groups finished officially their work to prepare good and operationally feasible results
- EASA showed openness to the views of the industry and National Authorities and considered many of them
- Realistic hopes before the publishing of the NPA, that there would not be any major bad surprises
- Development of a trustful relationship with EASA
- All parties followed a common goal: Make a workable set of rules for Aerodromes

Drafting process

- ACI EUROPE and its members were overall happy with the drafting process
- ACI involved its members through a task force to allow wider membership to be involved in the process
- There were still open issues which could not be finally solved prior to the NPA
- ACI EUROPE addressed in a letter to EASA concrete suggestions for improvements
- Main concerns were higher flexibility and more clarity on the rules
- Many issues raised by ACI EUROPE could be accommodated in the drafted rules before the NPA was published

NPA ACI View



- Comments provided by ACI EUROPE represent the **common agreed view of our membership**
- ACI EUROPE is not in a position to address each and every issue raised by our individual airports and or national airport associations in our response due to great diversity in:
 - > Size of the airports
 - > Specific geographic location
 - > Specific local circumstances
 - > Specific national law
- these issues are of crucial importance for the future existence of these airports and we recommend that EASA considers and takes on board as many of these comments as possible

NPA & Status Quo

- Overall we highly appreciate the spirit of cooperation up to the publishing of the NPA and until now
- There are still some comments ACI EUROPE addressed in the NPA since we believe that they are crucial for a successful set of aerodrome rules
- Within these requirements the responsibility of the aerodrome operators are significantly increased for many members
- Many members feel that the administrative workload and administrative costs will increase.
- We suggest to make the Implementing Rules less detailed and more like a framework and transfer many AMCs and CS into Guidance Material.



NPA & ICAO Standards vs. Recommendations



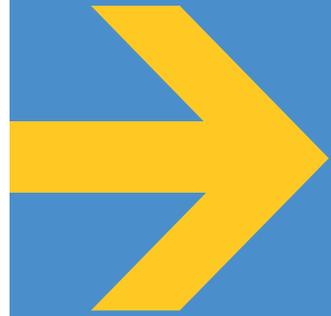
- provisions for flexibility, customised compliance and proportionality given under the existing ICAO system, are in our view not satisfactorily reflected in the NPA documents
- It is notably due to the fact that recommendations have been transposed to the same level as standards (into CSs) which has never been accepted by ACI EUROPE
- **ACI EUROPE membership urges EASA to keep the existing flexible system currently provided for by differentiating between Standards and Recommendations**



Conclusions

- The remaining issues addressed by ACI EUROPE and its individual members are seen as crucial for the future existence of these aerodromes and should be carefully considered
- We fully support the suggested “DAAD” procedure for existing deviations as provided for in Art. 7 of Book 1 in the NPA
- **Yes** the rules will require changes in the existing documentation the creation of the Certificate as well as the administrative modus operandi
- **However**, the working relationship between aerodromes and National Authorities will not change!
- ACI EUROPE and its members will continue to offer their expertise in the future process whenever needed!
- **The rules will be there and we all need to make the best out of it!!!**





THANK YOU

www.aci-europe.org

www.airportcarbonaccreditation.org

