

# Future Aerodrome Safety Rules – the user's view

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## → ACI EUROPE Membership

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



# → Development of Aerodrome Rules in EASA



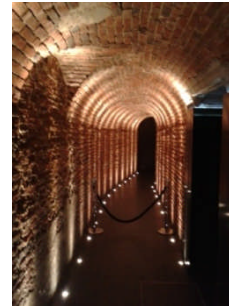
2008

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

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- 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

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- 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**

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- 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

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- 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

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- 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

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- 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

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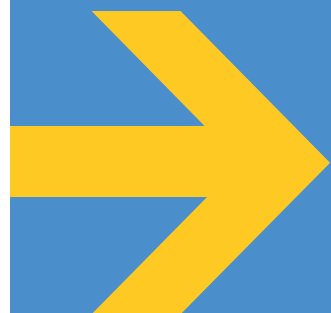
- provisions for flexibility, customised compliance and proportionality given under the existing ICAO system, are in our view not satisfactorily reflected in the NPA documents
- It is notably due to the fact that recommendations have been transposed to the same level as standards (into CSs) which has 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

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- 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](http://www.aci-europe.org)

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