



Comment-Response Document (CRD) 2021-08(B)

RELATED NPA: 2021-08(B) — RELATED OPINION: NO 06/2022 — RMT.0668

1.9.2022

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1. Summary of the outcome of the consultation

Please refer to Section 2.4 of the related Opinion No 06/2022.



2. Individual comments and responses

In responding to the comments, the following terminology is applied to attest EASA’s position:

- (a) **Accepted** — EASA agrees with the comment and any proposed change is incorporated into the text.
- (b) **Partially accepted** — EASA either partially agrees with the comment or agrees with it but the proposed change is partially incorporated into the text.
- (c) **Noted** — EASA acknowledges the comment, but no change to the text is considered necessary.
- (d) **Not accepted** — EASA does not agree with the comment or proposed change.

CRD table of comments, responses and resulting text

(General Comments)	-
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comment	1		comment by: <i>LBA</i>
		The LBA has no comments	
response		<i>Noted</i>	

comment	2		comment by: <i>CANSO</i>			
		<table border="1" style="width: 100%;"> <tr> <td style="width: 15%;">BASIC LAWB 1.1.2</td> <td style="width: 10%;">Doc B Page 5</td> <td> <p><i>“Describe the impact that key international and national these organisations have on ATC and their interaction with each other.”</i></p> <p>Previously, we would have to name the organisations in one objective, then describe their impact in the next objective. This inevitably involves listing them again before going on to the description. Merging objectives in cases such as this means less unnecessary repetition, anything that helps condense topics is welcome.</p> <p>We support the removal of objective and merging with the following 1.1.3 (now 1.1.2).</p> </td> </tr> </table>	BASIC LAWB 1.1.2	Doc B Page 5	<p><i>“Describe the impact that key international and national these organisations have on ATC and their interaction with each other.”</i></p> <p>Previously, we would have to name the organisations in one objective, then describe their impact in the next objective. This inevitably involves listing them again before going on to the description. Merging objectives in cases such as this means less unnecessary repetition, anything that helps condense topics is welcome.</p> <p>We support the removal of objective and merging with the following 1.1.3 (now 1.1.2).</p>	
BASIC LAWB 1.1.2	Doc B Page 5	<p><i>“Describe the impact that key international and national these organisations have on ATC and their interaction with each other.”</i></p> <p>Previously, we would have to name the organisations in one objective, then describe their impact in the next objective. This inevitably involves listing them again before going on to the description. Merging objectives in cases such as this means less unnecessary repetition, anything that helps condense topics is welcome.</p> <p>We support the removal of objective and merging with the following 1.1.3 (now 1.1.2).</p>				



response Noted

comment 3

comment by: *CANSO*

BASIC LAWB 5.6.1 Explain the Rules of the Air.	Doc B Page 9	Sensible additions – we cover all this content in this objective, but it is good to have confirmation that we need to cover, for example, Flight over the High seas. We agree with the listing of mandatory content here - Flight over the high seas, Applicability and compliance, General rules and collision avoidance
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response Noted

comment 4

comment by: *CANSO*

BASIC LAWB 5.6.4	Doc B Page 10	The addition of Special VFR here makes sense.
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response Noted

comment 5

comment by: *CANSO*

BASIC LAWB 5.8.4 Describe flight plan submission and distribution processes	Doc B Page 11	Helpful rewording of objective- previously it was a little hard to know what content was required – the rewording helps to clarify.
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response Noted



comment 6 comment by: *CANSO*

BASIC METB 1.3.1 State the basic duties of meteorological offices	Doc B Page 27	This and several other objectives have been simplified – previously the organisation and working methods of MET offices had to be covered which was beyond what was necessary in Basic training. Such simplifications of previously unnecessarily detailed objectives are welcomed by students and instructors.
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response Noted

comment 7 comment by: *CANSO*

BASIC METB 3.2.1 and 3.2.2 Air masses	Doc B Page 29	Another welcome simplification and reduction from L2 to L1.
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response Noted

comment 8 comment by: *CANSO*

BASIC ACFTB 2.2.4 List aircraft design features reducing induced 1 drag.	Doc B Page 41	Both good additions - previously aircraft lights had to be explained in Rules of the Air as it wasn't mentioned anywhere else.
BASIC ACFTB 2.2.5 Explain aircraft lights and their functions.		

response Noted



comment	<p>9</p> <p style="text-align: right;">comment by: AESA/DSANA</p> <p>AMC1 ATCO.D.010(a)(1) Composition of initial training: Subtopic LAWB 5.1 Units of measurement</p> <p>COMMENT It would be more logical for this first subtopic to include more information than just a simple list of the units of measurement.</p> <p>JUSTIFICATION The verb "describe" has been changed to "list", but later, throughout the syllabus, there are several subtopics in which the units of measurement must be applied with taxonomy 3, which implies using a practical method (ATMB 1.1 "Apply the units of measurement appropriate to ATM", METB 1.1 "Apply the units of measurement appropriate to meteorology", NAVB 1.1 "Apply the units of measurement appropriate to navigation"....)</p>
response	<p>Noted. The verb 'to list' is sufficient because application does not require description.</p>

comment	<p>10</p> <p style="text-align: right;">comment by: Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</p> <p>General Many of the GM's are more like AMC's. Revision of the GM's would be welcomed.</p>
response	<p><i>Noted</i></p>

comment	<p>11</p> <p style="text-align: right;">comment by: ATM-PP</p> <p>Attachment #1</p> <p>Having analysed NPA 2021-08, ATCEUC is deeply concerned with the political agenda of EASA: Instead of being a European Union Aviation <u>Safety</u> Agency, protecting the overall wellbeing of the citizens of the European Union, in the NPA it is blatantly obvious that this Institution is blindly following the Economic agenda of a restricted number of stakeholders and not taking Safety as the top priority of its activities.</p> <p>To support this overall analysis, we urge you to consider the following comments:</p> <p><i>"ATCO training has been claimed to be cumbersome, costly and time-consuming partially also due to the fragmented qualification structure."</i> (Page 9 of document A of NPA 2021-8)</p>
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This claim displays a fundamental failure to appreciate an ATCO's specific expertise. ATCO training duration is affected by the responsibility and dimension of the Safety-related tasks an ATCO executes at work. The perception of it as *"costly and time-consuming"* is deeply flawed and a purely market and profit-based opinion. It is, therefore, distressing to see this statement proposed by the European Union Agency whose mission should be to watch over European Union Aviation Safety.

"The simplification of the rating and rating endorsement system will establish a lean system of qualifications and provide benefits to the ATCO training organisations as regards the time-intensity and cost-efficiency of the training, while ensuring an equivalent level of safety."

(Page 9 of document A of NPA 2021-8)

ATCEUC highlights that this sentence shows that it is EASA's real intention with NPA 2021-8: to promote and ensure the economic interests of the ATCO Training Organisations. Such levels of transparency are welcome, but we can find no technical evidence from EASA to support the second claim made in this sentence. Therefore, ATCEUC asks EASA the following:

Question 1 - Did EASA conduct any detailed studies to support their claim that an *"equivalent level of safety"* will be ensured through the proposed measures in this NPA 2021-8? If so, which stakeholders were involved in that study? What was the ratio of ATCO and ATCO-OJTI qualified professionals in that study?

Moreover, ATCEUC also highlights that no reference is made in this sentence to ANSPs. Changes in the rating and rating endorsement system will have an impact at the Service Providers' level and, therefore, at the Safety levels of the European ATM System.

"On another issue, implementation feedback received from stakeholders has shown that the current regulatory framework is administratively burdensome when it comes to short-term job relations; for example, in the case of freelance instructors and assessors working for different ATCO training organisations in different Member States."

(Page 9 of document A of NPA 2021-8)

With this statement, once again, EASA is transparent enough to show everyone which interests are behind this proposed amendment. ATCEUC does not oppose the facilitation of ATCO's mobility between Member States but stating that *"the current regulatory framework is administratively burdensome"* highlights a deliberate ignorance about the rationale of the current framework, which is based on competence and proficiency evidence to guarantee the highest Safety standards. The same applies to the unpopularity of the short-term relations in the ATM Sector: Short-term contracts of employment are rarely used for ATCOs in Europe and ATCEUC does not foresee that to increase significantly in the next decade. Competence and proficiency (even for instructors providing initial training) require time to adapt and master the procedures before applying (or teaching) them. ATCEUC advocates that fostering short-term employments in ATM has a direct impact on the Safety levels (and on the quality of the initial training provided to prospective ATCOs) in the medium term and urges EASA to perform a Human Performance based study on this subject.

"This NPA contains proposals to remove several of the current rating endorsements to simplify the European system and further align with ICAO."

(Page 11 of document A of NPA 2021-8)



ATCEUC follows the intention of alignment with ICAO but highlights that the current rating endorsements' system has a Safety-based rationale behind. Therefore, removing any rating endorsement should be made with the guarantee that the required training associated with that rating endorsement will remain mandatory for the ATCO rating to which such rating endorsement was related. Besides that, deleting the rating ADV has implications in some Member States that have air traffic controllers with this rating solely.

"The general objective of RMT.0668 is to ensure a high and uniform level of safety in air traffic management (ATM)/air navigation services (ANS) (...)"

(Page 11 of document A of NPA 2021-8)

ATCEUC supports the general objective of RMT.0668 but underlines that, unfortunately, the current NPA has an obvious goal that is far from the stated one in this sentence. In fact:

"The specific objectives of this proposal are to simplify the system of ratings and rating endorsements, to facilitate the mobility of instructors, assessors and student ATCOs, to facilitate the licensing of ATCOs in cases of dynamic cross-border sectorisation, and to update and streamline the initial training content to be in line with the latest developments."

(Page 11 of document A of NPA 2021-8)

The specific objectives stated are unrealistic, cannot be implemented and have nothing to do with Safety. It is ATCEUC's belief that the simplifications suggested in this Amendment will endanger the European Skies in the medium term. EASA is suggesting changes in the rating and rating endorsements' system and in the initial training content just to reduce the costs of the initial training and, therefore, creating a market-based training system for ATCOs at European Level. ATCEUC has no information on any Safety Impact assessment study on the proposed changes, and we strongly suggest EASA, in line with its mission as a Safety Agency, to conduct a thorough one before proposing such an Amendment as this to the European Commission. Needless to say that ATCO representatives must be involved in such a fundamental study.

"2.4.1. Simplify the system of ratings and rating endorsements"

(Page 11 of document A of NPA 2021-8)

ATCEUC supports the rationale of merging the ADI and ADV ratings into a single ADC rating since it is a desired alignment with ICAO. Regarding rating endorsements, ATCEUC also supports merging rating endorsements privileges of TWR, AIR and GMC into the new ADC rating privileges. However, none of this merging processes should decrease the overall objectives of the initial, basic and unit training. To make it clear: ATCEUC accepts the administrative reform of some of the ratings and rating endorsements but condemns any initiative to reduce the duration, goals and/or standards of the current ATCO training framework, since it would most probably affect the current Safety standards observed in the European ATM infrastructure.

"2.4.1.1 Air traffic controller ratings"

(Page 12 of document A of NPA 2021-8)



Regarding Question 1 from EASA, ATCEUC highlights that ACP is needed to guarantee the necessary training to provide Safe Procedural Area Control in a portion of Airspace. Although the vast majority of the European Airspace might be under surveillance in the few years to come, to convert the current ACP privileges into an ACS add-on to cover only contingency situations would only be acceptable if those contingency procedures were to “empty the sky” and not to accept any additional traffic into the portion of Airspace where surveillance systems are unavailable. Regarding this statement ATCEUC highlights that the “empty the sky” rationale was mentioned by EASA representatives in a previous ATM/ANS.TEC meeting. Furthermore, ATCEUC also highlights that the new surveillance systems that are behind such rationale are outsourced (e.g. space-based ADS-B) and its providers follow a market-based philosophy in their operations. By deleting ACP and accepting that the sudden unavailability of the surveillance service provision means emptying the European Skies for as long as the external company needs to resume its normal operations, EASA is taking a high stakes gamble on a seamless service provision by private entities whose core mission and technical approaches are drastically different from the ANSPs’ proven infrastructural philosophy. Therefore, ATCEUC sees ACP will be needed from 2023 and beyond, until such time as the newcomers in the ADSP Sector become as resilient, competent and safe as the current ANSP-based systems and share the same basic goals.

“2.4.1.2. Air traffic controller rating endorsements”

“Additional comments addressed the identification of AIR or GMC as limitation in case of the expiry of the unit endorsement and following an exchange of licence. EASA considers however that this is covered by the current requirements on record-keeping and on the exchange of information between competent authorities.”

(Page 13 of document A of NPA 2021-8)

In this consideration EASA contradicts the goal of “simplification” mentioned in this NPA 2021-8 since it adds administrative burden in exchanging details of record-keeping between competent authorities. If the proposed rating system still requires record-keeping and exchange of information between competent authorities in cases of mobility between Member States, then it is obvious that the proposed rating system is over-simplified.

“The ground movement surveillance (GMS) and aerodrome radar (RAD) rating endorsements are proposed to be merged into one rating endorsement that is called ‘aerodrome control surveillance’ (SUR).”

(Page 13 of document A of NPA 2021-8)

ATCEUC does not agree with the merging of surveillance rating endorsements GMS and RAD into a single SUR, since using Surveillance systems to support ATCOs’ tasks is substantially different when applied at Ground level or Airborne traffic. Therefore, ATCEUC advocates that under the new ADC rating the GMS and SUR rating endorsements shall remain, with the second one referring to the Surveillance competence regarding airborne traffic only.

Regarding Question 2 from EASA, ATCEUC considers that the pressure on airport capacity during the next decade might cause military aerodromes to be converted into civil airports with a military apron. In these cases, military aircraft will be subject to the service provided by civil ATCOs and, therefore, PAR rating should be maintained. Moreover, as mentioned before, ATCEUC supports the alignment of the



EASA rating system with the ICAO rating system as far as possible. Having in mind that ICAO maintains such a rating, the same shall occur at EASA level.

“The proposal is that the ICAO location indicator should indicate the unit that manages the ATCO’s competence maintenance. The sectors, airspace or working positions, where the ATCO is competent to provide services, can be further specified in the unit endorsement by using other abbreviations.”

(Page 14 of document A of NPA 2021-8)

ATCEUC is aware of the FINEST project and its potential. However, ATCEUC would expect to see EASA focused on the Safety side of the project rather than the “flexible resource management” that the FINEST project aims at. Having this in mind, ATCEUC urges EASA to conduct a proper Human Performance based study on how Safety is affected by the variety of sectors that an ATCO may provide service to within the very same Unit. In the end, with this clarification, EASA might be fostering a project that contradicts the Safety goals of the very own Agency.

“In summary, the TF anticipates that the introduced changes (4 % reduction of Basic training objectives and downgrading to a lower taxonomy level) will contribute to a slight reduction of the duration of the Basic training.”

(Page 16 of document A of NPA 2021-8)

ATCEUC is shocked with the fact that EASA supports the reduction of Basic training objectives and a downgrade to lower taxonomy levels to reduce the duration of Basic training. Again: EASA is not focused on the Safety part of the system. Instead, EASA appears simply to be following an economic agenda of a few stakeholders, disregarding the Safety impact of its proposals. ATCEUC urges EASA to conduct a proper Safety Impact assessment on the mentioned “reduction of Basic training objectives and downgrading to a lower taxonomy level”.

“2.5. What are the expected benefits and drawbacks of the proposal”

“The proposed merging of GMS and RAD rating endorsements into one new rating endorsement called SUR corrects the identified deficiency in the regulation not enabling a holder of AIR and RAD endorsements to use aerodrome surface movement guidance systems.”

(Page 18 of document A of NPA 2021-8)

ATCEUC fully disagrees with this EASA statement. GMS and RAD rating endorsements do exist to differentiate two tasks that, although semantically similar, are extremely different to execute. Ground Movement Control aided by Surveillance systems is significantly different from Airborne Traffic Control with similar technological support. Moreover, many European airports have just one of the Surveillance systems available. ATCEUC advocates that GMS and RAD (converted into SUR) shall be maintained.

Regarding the expected benefits of this proposal (Page 19 of document A of NPA 2021-8), ATCEUC highlights the focus on the training organisation benefits and questions the ANSPs benefits. ATCEUC does not believe that “potential employment shortage being handled more easily thanks to the higher mobility of student ATCOs” will be observed, since EASA is lowering the Basic training standards to reduce the duration of the Basic training (for no good reason other than protecting training organisations’ bottom line).



Reducing these standards will result in an increased duration of the later Unit training as well as a reduction in the success rate of the Unit training process. Experience shows this will increase the overall training time and an ATCO shortage will still be a problem in the future, since it will always be down to the Human who will need time to acquire the necessary skills and to learn how to handle Air Traffic safely in any Air Traffic Control environment.

Changes in the administrative process at Basic training level will affect the Unit training level. ATCEUC urges EASA to look at the bigger picture when addressing ATCO training and to see the full cycle “from applicant to a qualified ATCO” and its interdependencies.

Regarding the benefits for ATCOs, ATCEUC urges EASA to consider that increased mobility might foster social dumping in the ATM Sector. ATCEUC is not against the increased mobility between Member States but urges EASA to conduct a proper Social Impact assessment on the increased ATCO mobility at European level.

“Considering that this proposal would not have major impacts and/or controversial items, a brief analysis of the main benefits and drawbacks has been included in this section and no detailed impact assessment (IA) has been performed, in accordance with the proportionality principle.”

(Page 19 of document A of NPA 2021-8)

ATCEUC does not agree with EASA's statement that the current NPA 2021-8 has no major impacts and/or controversial items. As one can read in ATCEUC's comments, many proposals may have major impacts, and many more are controversial items. Therefore, a detailed impact assessment shall be performed, with a proper PSO representativity in such study.

AMC 1 ATCO.B.025(a)(3) Unit competence scheme

“The minimum number of hours should be defined in a manner which ensures that the privileges are exercised in all sectors and/or positions covered by the unit endorsements.”

(Page 44 of document A of NPA 2021-8)

ATCEUC is concerned with the various implications of this AMC because it implies a different number of hours depending on the number of sectors of the specific centre. Moreover, during night shift for instance, the number of hours in the combined sectors shall be counted as total or divided by the partial sectors combined at each moment? Still, ATCEUC questions: why change something that is already working properly and creating complex problems for both ATCOs and Authorities? Finally: How shall this be applied in cases like the FINEST project?

Taking into consideration the overall comments, ATCEUC considers this NPA 2021-08 dangerous to the European Aviation Safety Standards. EASA is following a political path that doesn't serve the purpose of the European Citizens. Although some of the initiatives included in this NPA might be applicable, ATCEUC does not agree with the current proposed amendments since they aren't mature enough. Moreover, ATCEUC's main goal is to maintain Safety as the highest priority in the ATM System and it's regulatory framework, and we cannot accept any controversial changes like those suggested in the NPA 2021-08 to be implemented without a proper Safety Impact Assessment.



response

Noted

Please refer to the response provided to comment #255.



3. Attachments

 [20211007 ATCEUC Comments to EASA NPA 2021_ 8 final.pdf](#)

Attachment #1 to comment [#11](#)

