



Explanatory Note to ED Decision 2023/011/R

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

Regular update of the air traffic controller licensing rules *Enhanced mobility options and streamlined qualifications for air traffic controllers*

RMT.0668 — SUBTASKS 1 AND 2

EXECUTIVE SUMMARY

This Decision issues amendments to the acceptable means of compliance and guidance material to Commission Regulation (EU) 2015/340 laying down technical requirements and administrative procedures relating to air traffic controllers' licences and certificates, as amended by Commission Implementing Regulation (EU) 2023/893.

The objective is to facilitate the implementation of Commission Implementing Regulation (EU) 2023/893, which provides enhanced mobility options for instructors, assessors and student air traffic controllers, simplifies the structure of ratings and rating endorsements, and updates the initial training requirements, together with the introduction of a controlled mechanism for the conversion of national military air traffic controller licences into student air traffic controller licences issued in accordance with Commission Regulation (EU) 2015/340.

REGULATION(S) TO BE AMENDED/ISSUED
n/a

ED DECISIONS TO BE AMENDED
[ED Decision 2015/010/R](#) — Requirements on Air Traffic Controller licensing

AFFECTED STAKEHOLDERS

ATM/ANS service providers; national competent authorities (NCAs); air traffic controllers (ATCOs); ATCO training organisations (TOs); aero-medical examiners (AMEs); aero-medical centres (AeMCs)

WORKING METHOD(S)

Development	Impact assessment(s)	Consultation
By EASA with external support	Light	NPA — Public

Related documents / information

- [ToR RMT.0668 'Regular update of the air traffic controller licencing rules' \(implementing rules, acceptable means of compliance, guidance material\)](#)
- [NPA 2021-08 'Enhanced mobility options and streamlined qualifications for air traffic controllers'](#)
- [CRD 2021-08 'Enhanced mobility options and streamlined qualifications for air traffic controllers'](#)
- [Opinion No 06/2022 'Enhanced mobility options and streamlined qualifications for air traffic controllers'](#)

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



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1. About this Decision

1.1. How this regulatory material was developed

This rulemaking activity is included in Volume II of the European Plan for Aviation Safety (EPAS) for 2023–2025 under Rulemaking Task (RMT) 0668.

EASA developed the regulatory material in question in line with Regulation (EU) 2018/1139 (the Basic Regulation) and the Rulemaking Procedure, as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR)¹ for this rulemaking task.

This Decision groups Subtasks 1 and 2 of RMT.0668.

The AMC relevant to Subtask 1 ‘Conversion of national military air traffic controller licences into student air traffic controller licences issued in accordance with Commission Regulation (EU) 2015/340’ have been developed by EASA and have been consulted with its Advisory Bodies (ABs) in accordance with Article 16 ‘Special rulemaking procedure: accelerated procedure’ of MB Decision No 18-2015² (in force at that time). EASA had taken the decision to follow the procedure laid down in Article 16 as this regulatory proposal has a negligible impact and affects a limited group of stakeholders. Prior to the consultation with the ABs, EASA also presented the principles to the Member States at the ATM/ANS TeB meeting #2-2019 on 9 and 10 December 2019.

The comments received showed substantial support for the objective of the regulatory proposal, especially with the fact that it provides for a harmonised implementation throughout the EU, which ensures that converted military ATCO licences are issued in accordance with the same safety standards as civil ones.

Regarding Subtask 2 ‘Enhanced mobility options and streamlined qualifications for air traffic controllers’, EASA developed the text of this Decision with the support of EUROCONTROL and a group of subject-matter experts (ATCO focal points) nominated by the ABs, representing NCAs, air navigation service providers (ANSPs), ATCO training organisations, and ATM professional organisations.

The development of this regulatory material was preceded by a survey, prepared in cooperation with EUROCONTROL, which was addressed to the ATM/ANS TeB and TEC members in June 2019 to gain knowledge on the current use of ratings and rating endorsements in the EASA Member States and to ask for the opinion of the stakeholders on their future use. Based on the responses, and on individual consultations with Member States, EASA prepared a proposal on the new structure of ratings and rating endorsements.

A comprehensive review of the existing initial training content was performed upon EASA’s request with the assistance of the EUROCONTROL ATCO CCC Training Task Force, resulting in the removal of the subject objectives and in the modification of some topics and subtopics.

¹ [ToR RMT.0668 - Regular update of the air traffic controller licencing rules \(implementing rules, acceptable means of compliance, guidance material\) | EASA \(europa.eu\)](#)

² See MB Decision No 18-2015 of 15 December 2015 replacing Decision 01/2012 concerning the procedure to be applied by EASA for the issuing of opinions, certification specifications and guidance material (<http://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-18-2015-rulemaking-procedure>).

The result of that comprehensive review was publicly consulted through Notice of Proposed Amendment (NPA) 2021-08³ from 24 June to 8 October 2021.

EASA published Opinion No 06/2022⁴ on 2 September 2022, proposing amendments to Regulation (EU) 2015/340⁵, based on which the European Commission adopted amending Implementing Regulation (EU) 2023/893⁶ on 21 April 2023.

Following the adoption of Implementing Regulation (EU) 2023/893, EASA finalised and issued the corresponding amendments to the related AMC and GM.

³ [NPA 2021-08 - Enhanced mobility options and streamlined qualifications for air traffic controllers | EASA \(europa.eu\)](#)

⁴ Opinion No 06/2022 'Enhanced mobility options and streamlined qualifications for air traffic controllers' (<https://www.easa.europa.eu/en/document-library/opinions/opinion-no-062022>).

⁵ Commission Regulation (EU) 2015/340 of 20 February 2015 laying down technical requirements and administrative procedures relating to air traffic controllers' licences and certificates pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council, amending Commission Implementing Regulation (EU) No 923/2012 and repealing Commission Regulation (EU) No 805/2011 Text with EEA relevance (OJ L 63, 6.3.2015, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32015R0340&qid=1685974244431>).

⁶ Commission Implementing Regulation (EU) 2023/893 of 21 April 2023 amending Regulation (EU) 2015/340 laying down technical requirements and administrative procedures relating to air traffic controllers' licences and certificates (OJ L 118, 4.5.2023, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R0893&qid=1685974896848>).

2. In summary — why and what

2.1. Why we need to act — issue/rationale

2.1.1. Conversion of national military air traffic controller licences into student air traffic controller licences issued in accordance with the ATCO Regulation

The availability of ATCOs in the European Union (EU) has been identified as one of the factors that restricts the capacity of the European ATM system. Another identified factor that hampers scalability and sustainability of the European ATM system is the limited flexibility in the use of the available ATCO resources.

The possibility to credit the training of military ATCOs received during their military service for the purpose of obtaining an EU student ATCO licence is now foreseen in the ATCO Regulation, similarly to the aircrew domain. Obtaining an EU student ATCO licence will enable applicants to further undertake a unit endorsement course, including on-the-job training, within a specific air traffic services unit for the purposes of the issuance of an EU ATCO licence.

For this purpose, Member States shall establish conversion reports according to which prior training of military ATCOs may be credited for the purpose of issuing EU student ATCO licences. In order to achieve a harmonised approach within the EU, the minimum content of such national conversion reports is specified in the related new AMC.

2.1.2. Enhanced mobility options and streamlined qualifications for air traffic controllers

With the aviation industry rapidly evolving, the ATCO Regulation needed to be updated to ensure that it is fit for purpose, cost-effective and is in line with the globally applicable standards and practices, as well as with the evolving related EU regulatory framework. The feedback from EASA's standardisation activities regarding the implementation of the requirements, as well as issues raised by the stakeholders, also call for enhancements to the regulatory framework.

Further improvements to the system of ratings and rating endorsements, being judged by the stakeholders too complex or not suitable for the local situations, were already highlighted in EASA Opinion No 11/2013⁷ of 2 December 2013, which led to the preparation and adoption of the ATCO Regulation. Furthermore, the results of the rating survey (see Section 1.1) indicated a need for simplification of the system, especially when it comes to rating endorsements. The present simplification is a thorough reconsideration of the system merging overlapping privileges and without losing specific qualifications.

Implementation feedback received from stakeholders has shown that the current ATCO licencing 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. The solution with the amended Regulation and the related AMC and GM is to provide more flexibility concerning the exchange of the licence when exercising the licence privileges in a Member State other than the one that issued the licence. Furthermore, it is considered beneficial to align the licence exchange process with that of the other aviation domains,

⁷ [Opinion 11/2013 - Licensing and medical certification of air traffic controllers | EASA \(europa.eu\)](#)

notably aircrew, in order to facilitate the work of the NCAs, since many of them have licensing departments dealing with licences of all aviation domains.

The ATCO initial training content was first issued with ED Decision 2015/010/R on 16 March 2015⁸. The main reason for the amendment is the introduction of newly published EU Regulations on areas that affect the ATCO training objectives, and in particular those concerning ATS requirements included in Regulation (EU) 2020/469⁹. The removal of the Aerodrome Control Visual (ADV) rating called for the removal of the ADV syllabus from the initial training content. In addition, this amendment includes changes of subjects, topics and subtopics that are mainly intended to make the ATCO training more effective.

Since the ATCO Regulation and the related AMC & GM have become applicable, EASA has been collecting implementation feedback from various sources, notably from the standardisation inspections of the competent authorities and from the EASA Advisory Bodies. After an evaluation of the issues raised with the focal points (see Section 1.1), several amendments of non-complex nature and editorial changes have been introduced to enhance the clarity of the rule and thus contribute to its harmonised interpretation and implementation at EU level.

Another stream of implementation feedback was the received alternative means of compliance (AltMoC), addressing experience requirements for the surveillance radar approach (SRA) rating endorsement (regulatory reference: point ATCO.D.055(b)), and proposing to conduct a portion of the required 25 surveillance radar approaches through the use of an approved synthetic training device.

The amendments related to Part ATCO.OR will support training organisations in implementing the requirements of Regulation (EU) No 376/2014 as part of their management system, rather than through the establishment of a separate system.

2.2. Description of the issue

2.2.1. Conversion of national military air traffic controller licences into student air traffic controller licences issued in accordance with the ATCO Regulation

The possibility to credit the training of military ATCOs received during their military service for the purpose of obtaining an EU student ATCO licence was not foreseen in the ATCO Regulation. Contrary to this, in the aircrew domain, Article 10 ‘Credit for pilot licences obtained during military service’ of Commission Regulation (EU) No 1178/2011 laying down technical requirements and administrative procedures to civil aviation aircrew establishes a specific mechanism for the crediting of knowledge, experience and skills of military pilots for the purpose of obtaining an EU pilot licence.

Member States have proposed to EASA that a similar system should be established within the ATCO Regulation in order to enable military ATCOs to obtain credit for the training received during their military service for the purpose of demonstrating compliance with the training requirements that apply to civil ATCOs. Member States believe that the military ATCO training in Europe provides for a high level of safety that is comparable to the civil ATCO training according to the ATCO Regulation,

⁸ [ED Decision 2015/010/R - Requirements on Air Traffic Controller licensing | EASA \(europa.eu\)](#)

⁹ Commission Implementing Regulation (EU) 2020/469 of 14 February 2020 amending Regulation (EU) No 923/2012, Regulation (EU) No 139/2014 and Regulation (EU) 2017/373 as regards requirements for air traffic management/air navigation services, design of airspace structures and data quality, runway safety and repealing Regulation (EC) No 73/2010 (OJ L 104, 3.4.2020, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020R0469&qid=1620636709837>).

and that it should be possible to take account of the national military ATCO training systems for the purpose of issuing EU ATCO licences. EASA agreed with this proposal and proposed provisions for this purpose.

2.2.2. Enhanced mobility options and streamlined qualifications for air traffic controllers

The results of the ratings survey (see Section 1.1) indicated a need for simplification of the system of ratings and rating endorsements, especially with regard to rating endorsements.

Implementation feedback received from stakeholders has shown that the current ATCO licensing regulatory framework is administratively burdensome when it comes to short-term job relations, as exchange of licence is required when exercising the privileges of the licence in a State other than the one that issued the licence.

Removal of the Aerodrome Control Visual (ADV) rating called for the removal of the ADV syllabus from the initial training content. The syllabi for basic training and training for the rest of the ratings needed to be amended to take into account the newly published ATM/ANS rules.

2.3. Assessment of the issue

It is necessary to amend the AMC and GM to the ATCO Regulation to facilitate the implementation of Commission Implementing Regulation (EU) 2023/893.

2.4. Who is affected by the issue

ATCO training organisations, ATM/ANS service providers, NCAs and air traffic controllers.

2.5. How could the issue evolve

If the AMC and GM to the ATCO Regulation are not updated, this may negatively impact the implementation of the amendments to the ATCO Regulation introduced by amending Commission Implementing Regulation (EU) 2023/893.

2.6. 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 issue(s) described in Section 2.1.

More specifically, with the regulatory material presented here, EASA intends to:

- facilitate the conversion of national military ATCO licences into civil student ATCO licences issued in accordance with the ATCO Regulation providing means to draw up the national conversion report for the purpose of crediting military experience;
- introduce simplifications resulting from the survey on ratings/rating endorsements conducted by EASA in 2019, and clarify the existing rules based on implementation feedback;
- provide enhanced mobility options for instructors, assessors and student ATCOs, and facilitate dynamic cross-border sectorisation;
- simplify and update the initial training requirements resulting from the work of the EUROCONTROL ATCO Common Core Content Task Force coordination.

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

Commission Implementing Regulation (EU) 2023/893 amending Regulation (EU) 2015/340 laying down technical requirements and administrative procedures relating to air traffic controllers' licences and certificates will become applicable on 4 August 2024. To assist its implementation, the AMC and GM are amended as follows.

2.7.1 Conversion of national military licences

The above objectives can be achieved by introducing the possibility of converting national military ATCO licences into civil student ATCO licences issued in accordance with the ATCO Regulation, based on a conversion report developed by the Member State, under which the training accomplished during military service could be credited.

This conversion report should address certain common elements, which are further detailed in an AMC. For the purpose of effective standardisation, and similarly to the case of military pilots, Member States shall notify EASA of the national conversion report issued. The report is not supposed to be individualised, but it shall be generic enough to cover the existing national military qualifications and privileges and to demonstrate the gap between those and the requirements of the ATCO Regulation, so that it can serve as the basis and justify the individual decision on the further training needs.

Individual experience shall be taken into consideration when designing the unit training course for the person in question following the issue of the student ATCO licence.

2.7.2 Simplify the system of ratings and rating endorsements

With the adoption of amending Implementing Regulation (EU) 2023/893, the number of ratings is reduced from six to five, and the number of rating endorsements from nine to three. This reduction is coupled with a thorough reconsideration of the system and of the fact that in the current system some privileges are 'overlapping'. Guidance is provided to the competent authorities explaining how the privileges of the licence holders will be adapted to and/or converted into the air traffic controller licences. New GM has been provided on the ADV rating and each of the removed rating endorsements to explain what the privileges of these have included. This is because the former ratings and rating endorsements may remain as entries in the licence but are not anymore explained in Part-ATCO.

There was a proposal to possibly abandon the Area Control Procedural (ACP) training module and replace it with a contingency module. The results of the rating survey however showed that 12 out of 45 respondents wished to maintain the ACP syllabus and therefore the only proposed amendment is the introduction of guidance explaining that the procedural rating (ACP or APP) rating is not required for holders of the corresponding surveillance rating (ACS or APS) when dealing with surveillance fall-back and contingency situations.

As for the rating endorsements, an AMC on the use of the converted SUR rating endorsement, referring to the provisions of the ATM/ANS Regulation on functions of ATS surveillance systems in the aerodrome control service, is provided.

The application form (GM) for the issue, revalidation and renewal of licences, ratings and endorsements has been updated to reflect the changes in ratings and rating endorsements.

Relating to unit endorsements a new AMC is introduced to indicate that if a unit endorsement course contains operational procedures only for air control or ground control, the unit endorsement should

reflect the limitation in relation to the rating privileges. New AMC's are also introduced to indicate that the training for ground movement surveillance and terminal control provision should be included in the unit endorsement courses.

2.7.3 Facilitate the mobility of instructors, assessors and student air traffic controllers

The provisions relating to exchange of licence in point ATCO.A.010 have been amended to facilitate the free movement of instructors and assessors, as well as for ATCOs who exercise student ATCO privileges, as they are not any more required to exchange their licence when exercising the privileges in a Member State other than the one that issued the licence, provided that they are not at the same time exercising the privileges of a unit endorsement. This in turn required also some amendments to the related GM.

The name of the process of exchanging the licence has been changed to 'change of competent authority' in order to align with the aircrew domain, and the need for a transfer of medical records to the receiving competent authority has been clarified. A licence verification form, the list of medical files to be transferred and a form for the transfer of ATCO medical records are provided as AMC.

2.7.4 Facilitate the licensing of ATCOs in cases of dynamic cross-border sectorisation

There are ongoing projects within the EASA Member States whereby dynamic cross-border sectorisation aimed at qualifying all ATCOs for all sectors within both FIRs is being introduced, thus enabling a more flexible resource management. EASA is of the opinion that the current rule is flexible enough to allow such multiple qualification. However, as the use of the ICAO location indicator in the unit endorsement has been identified as one of the potential problem areas, GM is introduced to clarify which ATS unit the ICAO location indicator should refer to.

2.7.5 Update the initial training requirements

At the time of publication of the initial issue of the AMC and GM to the ATCO Regulation in 2015, EASA was already aware of the need for continuous maintenance of the ATCO initial training provisions.

This update was undertaken with the support of Eurocontrol and has been accomplished in two phases. The results of the first phase resulted in the amendments to AMC and GM that were published in 2019. The results of the second phase II, included in this Decision, concern the removal of the subject objectives, editorial changes, objective relocation, objective corpus or/and content change, merging/branching of objectives, the introduction of new objective(s) and the removal of any obsolete/unnecessary objective(s). The amendments also include the modification of certain topics and subtopics, where necessary.

The amendments also concern the removal of some of the human factor's objectives from the initial training content, which are now included in an AMC related to unit training.

2.7.6 Align with other EU regulations and ICAO SARPs, correct errors and improve clarity

The AMC and GM related to the requirements for competent authorities (Part ATCO.AR) and for ATCO training organisations (Part ATCO.OR) have been aligned with similar provisions in the ATM/ANS Regulation and the related AMC and GM, for consistency. Similarly, the initial training content has been updated to take into account of the evolution of the ATM/ANS Regulation. Further alignment with ICAO SARPs is achieved, in addition to the alignment of the ratings, by updating the AMC relating to training for surveillance radar approach (SRA) rating endorsement. Furthermore, some changes have been introduced that aim at clarifying the intent of the rule more clearly.

The amendments referred to above include the following:

- A new GM has been added to facilitate the selection of the ICAO location indicator in the unit endorsement in cases of dynamic cross-border sectorisation.
- A new GM on assessment of previous competence clarifies that the word ‘assessment’ is used here in its general meaning thus also including examination of theoretical knowledge.
- A new GM recognising that completion of the on-the-job training phase may not be possible in cases of establishment of a new ATC unit or sector, new rating or rating endorsement put into operation at an ATC unit or reopening of a temporary ATC unit has been added.
- The AMC and GM relating to practical skills assessment for revalidation of unit endorsements and the commencement of the unit endorsement validity have been amended for the cases of continuous assessment to clarify how to define the validity period.
- The new AMC, stating that 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 endorsement, is based on the many findings raised during the standardisation inspections, indicating that there is not sufficient assurance that the ATCOs maintain their competence for all positions they are entitled to work at.
- The AMC relating to the establishment of the first validity period for English language endorsement level 6 holders has been removed as obsolete.
- A new GM has been provided on what the competent authorities should take into account if shortening the experience requirement for the STDI endorsement issue from 2 years to 1.
- The AMC related to the duration of unit training courses has been amended to include the following:
 - the possibility to shorten the on-the-job training (reduce experience requirements) in accordance with ICAO Annex 1, 4.5.2.2.3; this possibility is already provided for in point ATCO.D.055(b)(7), but has been included also here for clarity;
 - the training requirements for the SRA duties in ICAO Annex 1, 4.5.2.2.1(c);
 - the possibility to partly substitute the on-the-job training for SRA duties by utilising a simulator, as performing the required amount of SRAs with live traffic is not always possible.
- A new GM is provided to further illustrate the possibilities to shorten the unit endorsement course(s);

- The AMC and GM to Part-ATCO.AR related to information to the Agency have been aligned with Regulation (EU) No 376/2014 on occurrence reporting.
- A new GM is provided to further clarify what the necessary information to be exchanged between the competent authorities should include.
- The GM on allocation of tasks to qualified entities has been amended to be in line with Article 69 of the Basic Regulation.
- The GM on the certification procedure for training organisations and the issue of certificates has been aligned with the ATM/ANS Regulation.
- A new GM has been introduced to provide additional guidance on what information the competent authorities may include in the attachment to the training organisation certificate.
- The AMC and GM on the corrective action implementation period have been deleted as experience has shown that 3 months may not be long enough to implement comprehensive actions, and the requirement may just lead to numerous extensions being applied.
- A new AMC on findings and corrective actions has been introduced to align with the ATM/ANS Regulation.

Lastly, the legal references have been amended as necessary to ensure regulatory consistency, and both erroneous text and references have been corrected.

2.7.7 Differences of the final AMC and GM compared to the draft ones consulted in NPA 2021-08(A)

The comments received during the consultation led to amendments to the following proposed AMC and GM:

GM1 Article 7(2)	transposed into AMC
GM1 Article 8	additional guidance provided
GM1 ATCO.A.010	wording changed
GM1 ATCO.A.010(b)	new GM added
GM1 ATCO.A.010(b);(c)	new GM added
GM1 ATCO.A.015(b);(c)	merged with previous GM1 ATCOA.015(b)
GM1 ATCO.B.001(a)(d)	new GM added
GM1 ATCO.B.001(d)	wording changed
GM1 ATCO.B.005(e)	wording changed
GM1 ATCO.B.010(a)(2);(3)	transposed into AMC and text added
GM1 ATCO.B.010(a)(4);(5)	transposed into AMC and text added
GM1 ATCO.B.010(b)	wording changed
AMC1 ATCO.B.015(a)	amended
GM1 ATCO.B.020(a)	removed
GM1 ATCO.B.025(a)(3)	transposed into AMC
GM2 ATCO.B.025(a)(3)	removed
AMC2 ATCO.D.045(c)(4)	new AMC added
AMC1 ATCO.D.055(b)(6)	text added
GM1 ATCO.D.055(b)(7)	wording changed
AMC1 ATCO.D.060(c)	new AMC added
AMC2 ATCO.D.060(c)	new AMC added
GM1 AMC1 ATCO.D.080(b)(3)	new GM added
AMC1 ATCO.AR.E.001(e)	wording changed

AMC1 ATCO.AR.E.010(a) wording changed
GM1 Appendix 1 to Annex II new GM added

2.8. What are the stakeholders' views

Comments were received from interested parties, including Advisory Bodies, ANSPs and training organisations, NCAs, and social partners, as well as stakeholder groupings.

Regarding Subtask 1, the comments received on the regulatory text to enable the conversion of military ATCO licences showed substantial support with the aim of the proposal, especially with providing a harmonised implementation throughout the EU, which ensures that converted military ATCO licences are issued in accordance with the same safety standards as civil ones. No particular feedback was received on the proposed AMC during the AB consultation.

Concerning Subtask 2, NPA 2021-08 'Enhanced mobility options and streamlined qualifications for air traffic controllers' was structured in seven files, titled from A to G as follows: NPA 2021-08(A) included proposed amendments to the ATCO Regulation and associated AMC and GM, while NPAs 2021-08(B) to (G) included proposed amendments to the AMC and GM related to initial training requirements. In total, 233 comments were received on NPA 2021-08(A). Almost half of the comments on NPA 2021-08(A) were submitted by 15 NCAs, including one from a non-EU Member State. ANSPs and training organisations provided altogether 102 comments, resulting to around 44 per cent of the total, but it must be noted that 35 of these comments were repetition of individual comments by a stakeholder grouping. The rest of the comments were received from social partners and one individual. Most of the comments on NPA 2021-08(A) concerned the amendments of the Regulation and only a small part (approximately 30) of the comments were on the AMC and GM.

Besides of receiving supporting comments, the feedback received allowed EASA to identify subjects of the NPA proposal for which further consideration and, in certain cases, further elaboration or amendments were necessary. 44 of the comments were accepted, 40 were partially accepted, 22 not accepted, and the rest were noted¹⁰.

As for the NPAs on initial training content, 11 comments were received on NPA 2021-08(B) on basic training, 7 on NPA 2021-08(C) on ADC training, 5 on NPA 2021-08(D) on APP training, 3 on NPA 2021-08(E) on ACP training, 4 on NPA 2021-08(F) on APS training, and 4 on NPA 2021-08(G) on ACS training. Three of the comments on each of the NPAs were the same and they were of general nature, not addressing any specific point of the proposed AMCs in question. Other comments on the amended initial training content were mainly of supporting nature. Three of the comments were accepted and led to amendment of the content of training objectives in the ADC and APP syllabi.

¹⁰ [CRD 2021-08 - Enhanced mobility options and streamlined qualifications for air traffic controllers | EASA \(europa.eu\)](#)

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

The impact assessment on the enhanced mobility options and streamlined qualifications for air traffic controllers included in the respective Opinion No 06/2022 is still valid. Compared to that impact assessment, the AMC and GM issued with this Decision are not expected to bring about additional impact while they are expected to confirm the beneficial effects.



4. Monitoring and evaluation

EASA will monitor the effectiveness of both new and amended AMC and GM through regular standardisation activities, as already foreseen in the related Opinion¹¹.

¹¹ [Opinion No 06/2022 - Enhanced mobility options and streamlined qualifications for air traffic controllers | EASA \(europa.eu\)](#)



5. Proposed actions to support implementation

- Focused communication for Advisory Body meeting(s) (MAB/SAB/TeB/TEC)
- Dedicated meetings with stakeholder groups, as required



6. References

- Annex 1 'Personnel Licensing' to the Convention on International Civil Aviation (Chicago Convention)

