

European Aviation Safety Agency

4-year Rulemaking Programme 2012 – 2015

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1. Executive summary

1.1. Introduction

The 4-year Rulemaking Programme 2012-2015 contains the rules which are expected to be issued in the year 2012 and a plan ahead for the years 2013-2015. It is built on the principle that the tasks planned for finalisation in 2012 constitute the Agency commitment to deliver these tasks during 2012 whilst the planning of the tasks for the following years (2013-2015) is indicative and is subject to annual review taking into account the identified priorities and the resources available.

The planning accuracy for the subsequent years goes down gradually reaching 20% uncertainty in 2015. Emerging priorities and urgent tasks have also to be taken into account. This could lead to a change of the priorities in the year (a task will have to be removed to take on a new one). The 4-year Rulemaking Programme will be reviewed annually.

Each potential rulemaking task is supported by a preliminary Regulatory Impact Assessment (RIA), which makes a baseline assessment of safety, environmental, economic, social risks and takes into account issues of proportionality, regulatory coordination and harmonisation. On the basis of the Pre-RIAs scores and taking into account the resources available, the Agency drafts a Ranking list (listing the degree of priority allocated to every new task), which represents the "queue" of rulemaking tasks planned to start in the following year or later when resources become available.

For the tasks on which the Agency will work, the start and end dates are given, as well as the resources assigned to the task, the driver, the working method and the end deliverable.

The Rulemaking Programme includes also the tasks on which the Agency cannot work (the inventory tasks) because of low priority or limited resources.

1.2. Budget and resources

During preparation of the Rulemaking Programme, the Agency takes also into account the budgetary and staff planning document and information within the limits set in the various adopted Agency's budgetary and staff planning documents for the same period (e.g. BP 2012-2016, MSPP 2012-2014).

At the same time, the Agency follows the discussions in the MB for the development of the Proposed Budget 2012, Draft Budget 2013, Staff Policy Plan 2013-2015, which are expected to be adopted in December 2012, and which might lead to a re-alignment of the rulemaking programme, if required.

The budget and resources are allocated to the different type of activities of Rulemaking activities; Production of technical rules, Coordination of rulemaking process, ICAO, External relations, Analysis/research, Administration, New developments and Handling of exemptions.

1.3. Consultation

Comments during the drafting of the 4-year Rulemaking Programme 2012-2015 have been gathered from the following actors:

- The EC has indicated in the opinion on Agency's Work Programme 2011 to recognise the progress made by the Agency in the prioritisation process with a focus on safety risks and that the rulemaking programme 2011-2014 largely met its objectives. However, the EC made a number of recommendations followed-up by the agency. These recommendations concerned, among others, the following elements: to increase the efficiency of the rulemaking process, to facilitate and accompany stakeholders in the process of a coordinated and efficient application of the adopted rules, to outsource where relevant.

- The ranking list was shared with the consultative bodies AGNA and SSCC in March 2011. The comments received by AGNA and SSCC from the June and May meetings, respectively, have been taken into account to the extent possible for the finalisation of the 4-year Rulemaking Programme 2012-2015.
- Consultation of the EASA relevant services.
- The coordination with the Federal Aviation Administration (FAA) and the Transport Canada Civil Aviation (TCCA) in the context of the rulemaking cooperation arrangement.
- The European Aviation Safety Plan (EASP)

1.4. Basic assumptions

The following elements have been taken into account in setting up priorities and drafting the document:

- the legislative obligations of the Agency in respect to the 1st and 2nd extension of its remit;
- Eurocontrol support to Single European Sky safety related activities in the context of the arrangements between the EU and Eurocontrol;
- ATM developments (SESAR and alike) mainly impacting ATM/Airport Department, but other disciplines as well.
- compliance of rules to ICAO SARPs or identification of differences where these exist;
- outsourcing of selected tasks to Certification and Stakeholder Groups in order to increase output;
- changing priorities and new developments can occur during the year like the implications of volcano eruptions on the aviation transport system;
- changes in the rulemaking process following the review needs to be introduced and will require time and resources from rulemaking staff;

1.5. Areas of activities

In implementing the 4-year planning, the Rulemaking Directorate has identified its areas of activities:

- A. Production of technical rules
- B. Coordination of rulemaking process
- C. ICAO
- D. External relations
- E. Analysis / research
- F. Administration / management
- G. New developments
- H. Handling of exemption
- I. Legal

A detailed list of these areas of activities is given in [Annex 1](#). For each area of activity the actions, deliverables and the average workload is shown.

When developing this Rulemaking Programme, it was necessary to take into account that the core activities and stages of development vary in the different Departments of the Rulemaking Directorate.

Environmental Protection and Product Safety Departments have reached a 'cruising' phase. The Implementing Rules are in place and thus the rulemaking in this domain aims largely at maintaining the rules (review and adapt to new developments such as SMS and OSD). The Flight Standards and ATM/Airport Departments, on the other hand, are in the 'take-off' phase, i.e. Implementing Rules are under development.

The below table list the forthcoming activities for the Environmental Protection (R.2), Flight Standards (R.3), Product Safety (R.4) and ATM/Airport Departments (R.5)

REMIT	ACTIVITY	2012	2013	2014	2015	2016	
ER	Rulemaking - Environmental Protection	Finalise implementation of CAEP/8 Amendments					
			Implementation of CAEP/9 amendments				
						Start of implementation CAEP/10 amendments	
		Start review ENV protection essential requirements (resources permitting)					
	Rulemaking - Product Safety	Maintain the rules taking into account the high regulatory demand from stakeholders, the accident investigation safety recommendations, urgent safety needs (e.g. volcanic ash issues), new technologies developments, business developments					
1st EXT	Rulemaking - Flight Standards	EC adoption of last implementing rules on 1st extension initial package					
		Follow up phase: Rule development for subjects not addressed in the initial rules and Safety priorities	Maintenance of rules and new developments				
2nd EXT	Rulemaking - ATM/Airports	1) Continue the development of implementing rules for ATM/ANS implementing the Basic Regulation in its entirety 2) EC adoption in 2012 and onwards					
				1) Maintenance of rules 2) new developments (e.g. SESAR developments and SES II) 3) ICAO SARPs alignment 4) Safety recommendations			
		Implementing rules for aerodrome safety to be developed and adopted by end 2013 (Requirements for aerodrome operators and competent authorities; aerodrome operations; and aerodrome design)					
			Development of implementing rules on heliports, aerodrome equipment and apron management	Maintenance of rules and new developments			

A short overview of the other Departments is given below:

International Cooperation (R.1) is the interface between the Agency and its foreign non-EU partners. According to its mandate, the Agency has to co-operate with Third countries (outside the EU) bilaterally or within international forums to promote the EU/EASA system. On the other end it is important, via ICAO, to support convergence of regulatory systems at global level and promote Community views in the field of civil aviation safety and environmental protection at all worldwide decision-making levels. In addition, to contribute to the establishment of a high level of civil aviation safety worldwide, the Agency shall promote EASA rules and assist third countries in improving their safety oversight capabilities via cooperation projects. By so doing, the Agency also sets the ground for developing the network of partners with whom it will be possible to conclude working arrangements.

The core activities of the Process Support Department (R.6) are an integral part to the production of technical rules: Regulatory Impact Assessments (RIA); editing, consultation, publication and translations of rules; management of rulemaking and review groups. In addition, the Department provides management oriented services: decentralised financial and procurement tasks; coordination of the business planning process; the AGNA and SSCC secretariat for consultation on the Rulemaking Programme; production of quality documentation for processes managed in the Directorate; management of the Directorate's ICT projects; management of the Publication Framework and stakeholder management support. The workload of the department is directly related to the volume of rules created.

Legal Department (R.7) provides support to Operational Departments within Rulemaking in the Production of technical rules. R.7 plays also a central role acting as a service provider of legal advice to all Directorates in EASA.

2. Highlights on ATM Master Plan and ADR activities

The safety advisory role of the Agency in the Single European Sky (SES) effects the Agency's workload in 2012, as the Agency is responsible for ensuring that the safety objective to establish and maintain a high uniform level of aviation safety is properly addressed also in the implementation of the SES. However, as required by the Basic Regulation, the Agency has also to meet objectives such as: ensure a high uniform of environmental protection, facilitate the free movement of goods, persons and services, promote cost-efficiency in the regulatory and certification processes and avoid duplication at national and European level, provide a level playing field for all actors in the internal aviation market including the application of rule resulting from SES implementation. Implementation of SES during this period will most likely necessitate the Agency to assist the European Commission by conducting certain rulemaking tasks, which unfortunately cannot be fully identified or quantified at this stage in the Rulemaking Programme. However the Agency has identified 52 potential projects where rulemaking action is probable. In addition the SES ATM Master Plan- and the deployment of SESAR technology will have a direct impact on the current 4-year Rulemaking Programme. Not only the ATM Rulemaking Programme will be subject to changes during 2011 and 2012 but most likely also the Flight Standards and Product Safety related rulemaking tasks. This is to accommodate timely the necessary Rulemaking tasks to enable the deployment of ATM Master Plan as off 2013. Whatever form or structure will be put in place for the deployment phase, the Agency's Rulemaking function will be an essential element to make it succeeding.

The Agency continuously supports the Commission in finding a Europe wide solution that will maximise available airspace, while ensuring the safety of the operation. Airworthiness, Operations and ATM requirements will need to be addressed for future actions in the field of airspace contamination with volcanic ash. The Agency will work with ICAO, Member States, manufacturers, ANSPs and Aerodromes to find the most appropriate and cost effective way to reduce future impact of volcano eruptions on the aviation transport system, while ensuring at the same time the safety of aircraft operations. Finally, the identified need for EU leadership in the event of airspace management crisis has led to a recommendation to accelerate the implementation of the Single European Sky II package (SES II). The SES II package aims at redesigning the European sky according to traffic flows rather than national borders in order to put in place a single European system for air traffic. The Commission has proposed to fast track many elements of the Single European Sky package, including the appointment of a European network manager. A more harmonised and co-ordinated approach to risk and flow/capacity assessment, and the ability to formulate quickly proposals for solutions are needed. The implementation of the SES II package is impacting directly the Agency rulemaking activities at least in the field of ATM/ANS and therefore it welcomes the development of a coherent EASA/SES Rulemaking Roadmap.

In the Terms of Reference for the aerodrome rulemaking tasks ADR.001, ADR.002 and ADR.003 it was mentioned in footnotes that the "Implementing measures for heliports (Annex 14, Volume II, Heliports) both in terms of stand-alone Instrument Flight Rule (IFR) heliports as well as Visual Flight Rules (VFR) heliports collocated at certified aerodromes will be done at a later stage". Until these implementing rules are in place, the respective national regulations will be applicable, to the extent they do not conflict with applicable community rules. It is planned to start such a task in accordance with the rulemaking procedure during the course of 2012. Furthermore, for the subject of aerodrome equipment it was mentioned that: "...the requirements for aerodrome equipment, as well as for the oversight over designers and producers of safety-critical aerodrome equipment will follow at a later stage possibly jointly with the work to be done for specific ATM systems and constituents". This task has already been started by the department and is named ATM.005.

3. Content and format overview

3.1. Content overview

The tasks of the 4-year Rulemaking Programme are grouped per discipline (Environmental Protection, Flight Standards, Product Safety, ATM/Airports) and include tasks leading to:

- **Opinions** of the Agency on amendments of the Basic Regulation and its Implementing Rules; and
- **Decisions** of the Executive Director of the Agency issuing Certifications Specifications, including Airworthiness Codes and Acceptable Means of Compliance, as well as Guidance Material, it recommends to be used to ensure compliance with the Basic Regulation and its Implementing Rules.

The Inventory list of tasks on which the Rulemaking Directorate cannot initiate work with the currently available resources can be found in [Annex 2](#). The inventory tasks are also shown per field (Environmental Protection, Flight Standards, Product Safety, and ATM/Airports).

3.1.1. R.2 – Environmental Protection in 2012-2015

See "[R.2 Environ Protection RMP 2012-2015.pdf](#)"

3.1.2. R.3 – Flight Standards Department in 2012-2015

See "[R.3 Flight Standards - RMP 2012-2015.pdf](#)"

3.1.3. R.4 – Product Safety Department in 2012-2015

See "[R.4 Product Safety - RMP 2012-2015.pdf](#)"

The workload for 2013-2015 needs still to be reviewed to take into account the tasks coming from the development of SES, SESAR and EASP and at the same time to ensure that the programme is completely realistic and achievable.

3.1.4. R.5 – ATM/Airport Safety Department in 2012-2015

See "[R.5 ATM-Airport - RMP 2012-2015.pdf](#)"

3.2. Format overview

The Rulemaking Programme 2012-2015 is provided with the following information per task (see **Picture 1**) – The text in bold indicates a new field:

- **Task number (new numbering and old numbering)**
- Task title
- **Task description**
- **Related EASA rules**
- Changes from the adopted Rulemaking Programme 2011-2014 (including consultation)¹
- Pre-RIA score²
- Driver

¹ This column includes the changes done to the adopted 4-year Rulemaking Programme 2011-2014 for addressing the AGNA and SSCC comments received in March and April 2011 as well as any internal consideration (e.g. updating on resources available).

² Only tasks which have received a pre-RIA according to the new format have a pre-RIA score. This is just for the transition period. In the following years most of the tasks will have a pre-RIA score.

- Discipline (and related Department)
- Work method (Agency³ or Group)
- Deliverable (task leading to: Opinion or Decision)
- Start and end date (year and quarter)
- Planned FTEs per year

Current rulemaking program	Task No. (old no.)	Old numbering	Title	Description	Changes from RMP 2011-2014 to RMP 2012-2015	Driver	Related EASA rules	Comments for ranking/Pre-RIA score	FC Environmental Protection R3 Flight standards R4 Product Safety R5 ATM/Airports	Work method	Task leading to	Start date		End date		2012 FTE	2013 FTE	2014 FTE	2015 FTE
												Year	Quarter	Year	Quarter				
2012-2015	RMT.0184 (FCL.008 a)	FCL.005 (a)	Extension of competency-based training to all licensees and ratings and extension of TEM principle to all licensees and ratings	(IR)		Industry Request		B18	FS	Group	Opinion	2014	02	2017	02			0,093	0,125
2012-2015	RMT.0185 (FCL.008 b)	FCL.005 (b)	Extension of competency-based training to all licensees and ratings and extension of TEM principle to all licensees and ratings	(AMC/GM)		Industry Request		B18	FS	Group	Decision	2014	02	2018	02			0,093	0,125
2012-2015	RMT.0187 (FCL.007 b)	FCL.007 (b)	FSTDs	Review of CS/AMC/GM to assure alignment with the new ICAO doc. 9625, 3rd edition as a new technical basis for all international standards for new fidelity levels of Flight Simulation Training Devices (FSTDs) required to support each of the required training tasks	Title changed	ICAO alignment		B18	FS	Group	Decision	2012	03	2018	03	0,063	0,125	0,125	0,125

Picture 1

The Inventory includes the following information (see **Picture 2**) – The text in bold indicates a new field:

- **Task number (new numbering and old numbering)**
- Task title
- **Task description**
- **Related EASA rules**
- Changes from the adopted Rulemaking Programme 2011-2014 (including consultation)
- Pre-RIA scores (where available)
- Driver
- Discipline (and related Department)
- Possible Work method (Agency or Group)
- Possible Deliverable (Task leading to: Opinion or Decision)

Current rulemaking program	Task No. (old no.)	Old numbering	Title	Description	Changes from RMP 2011-2014 to RMP 2012-2015	Driver	Related EASA rules	Comments for ranking/Pre-RIA score	R2 Environmental Protection R3 Flight standards R4 Product Safety R5 ATM/Airports	Work method	Task leading to
inv.	RMT.0193 (FCL.005 b)	FCL.005 (b)	NPA on "Non-technical skills assessment system" for JAR-FCL 1 and 2	Transfer of JAA NPA-FCL 27 in AMC/GM.		JAA Transfer	B6		FS		Decision
inv.	RMT.0200 (FCL.009 a)	FCL.009 (a)	Training for flying by sole reference to standby instruments	Development of IR addressing safety recommendation UNKG-2007-062.		Air Accident Investigation recommendation	B7		FS	Group	Opinion
inv.	RMT.0201 (FCL.009 b)	FCL.009 (b)	Training for flying by sole reference to standby instruments	Development of AMC/GM addressing safety recommendation UNKG-2007-062.		Air Accident Investigation recommendation	B7		FS	Group	Decision

Picture 2

³ When the working method is 'Agency', it is specified if the working approach includes cooperation with FAA or support from the Industry.
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4. Annex 1 - Areas of activity

#	Area of activity	Actions	Deliverables	Average workload/year
A	Production of technical rules	Implementation of rulemaking programmes, including drafting, regulatory impact assessment, editorial work, consultation, translation and publication of rules. Management of rulemaking groups and review groups (where applicable)	Terms of Reference and Group Composition (where applicable), NPAs including RIA; CRDs; Opinions; Decisions. RIA review	2 tasks per Rulemaking officer (this includes on the average 5 Group meetings per task taking 5 days each incl. preparation and follow-up, and 10 days for developing NPA, CRD or Opinion/Decision) N.B. The Workload on rulemakings related to the extension depends on the number of comments received on the NPAs and the adoption of the IR
B	Coordination of rulemaking process	Development of rulemaking programme, including planning of cooperation with foreign partner authorities; performance monitoring	4-year rulemaking programme for year N;	1/year
		AGNA and SSCC meetings	Agenda and papers; Meeting; Notes/actions opened; Administrative support to members	AGNA: 3/year SSCC: 2/year
		Coordination with other Directorates	Interpretations/policy formulation; Standardisation visits	continuous
		Preparation and participation to workshops/seminars	Logistics and presentations	10 workshops per Department
		Answering letters and e-mails	Interpretation/policy formulation	continuous
		Communication with stakeholders	Information; Meetings; Press release/articles; Newsletter; Value-added publications (VAP); Rulemaking e-Handbook	continuous
C	ICAO	Participation into ICAO activities e.g. secretariat, panels, committees and conferences (Airworthiness, OPS, Licensing panels and Committee on Aviation Environmental Protection, meeting with representatives in ICAO)	Working papers and presentations	continuous
		Participation to EASA audit	Contribution to SAAQ; checklists and protocols; Follow up on audits	1 every three years
		Contribution to Member States audits	USOAP checklists, briefings, draft replies etc.	ad-hoc depending on ICAO programme
		Meeting with NSOC	Presentations	1/year

#	Area of activity	Actions	Deliverables	Average workload/year
		State letters	Draft reply to R1 and final reply to Commission by R1	ad-hoc depending on ICAO programme
D	External relations	Drafting Bilateral agreements/working arrangements and support to their implementation	Drafting; Interpretations/policy formulation	depending on third countries and Council
		Technical cooperation	Programme formulation; Monitoring; Execution; Administrative support: Conferences; Training courses; Bilateral meetings on the spot	continuous
		Liaison with Institutions e.g. Commission, Third Country NAAs (FAA, TCCA, etc.), EUROCONTROL, and with stakeholders organisations such as ETF, AEA, IATA, ECA, ESA, EUROCAE, etc. EASA representation abroad	Information papers and presentations; Memorandum of understanding	continuous
		Internal co-ordination of international co-operation	Intranet communication; Internal meetings	continuous
E	Analysis / research	Accident Investigation Boards	Draft reply to recommendation; Working papers and presentations	continuous but with 6 internal accident investigation committee meetings per year
		Preparation and contribution to internal safety committee meetings	Safety policies	10 meetings per year
		Safety Initiatives e.g. ESSI, EASAC and the European Aviation Safety programme	tbd	three pillars ECAST, EGAST, EHAST: each has 4 meetings per year EASAC: 6 meetings per year
		Studies	Procurement and contract management; Support to Safety and Analysis Department	3 studies/year; Support to Safety and Analysis Department: 3 studies/year
		Research	Advise to FP consortium and Commission (meetings with DG RTD, review of EC work programme)	2 meetings/year with DG RTD
F	Administration / management	Day to Day Management e.g. financial and resources	Appraisal; Objectives; Coaching and guidance on RM Mission	continuous
		Quality	Contribution to procedures; Compliance e.g. exemption; Contribution to internal audits	Quality: continuous Internal audit: 1 every two years

#	Area of activity	Actions	Deliverables	Average workload/year
		IT related issues	ERP; DMS; BPM; SMIS; CRT enhancements; CQB; Rulemaking deliverables DB; interface of EASA data warehouse; deployment and testing of Legiwrite; tools in the context of RM review process; elicitation of new business requirements	continuous
		Training	Training maps; Contribution and participation to courses	6 days per staff member
		Recruitment	Interview preparation, contribution to report; Briefing of newcomers	depending on recruitment programme
		Secretariat	General support to day to day business (management of travel & sick leave, filling, mail management, social activities); Support to EASA representatives	continuous
		Business Planning	Contribution to Business Plan, Work programme, monthly reports, Activity report, ED report to MB, ad-hoc reports	continuous
		Budget management	Commitments; Payments; Recovery orders; Carry-over, etc.	continuous
		Staff Committee	Meetings, personal cases, etc.	0.1 FTE/year
G	Handling of exemption	Implementation of article 8 of Regulation 3922/1991;	Assessment of MS exemptions (draft, peer review, etc.)	ad-hoc (20 days per exemption; 8 days per derogation)
		Implementation of article 14 of BR 216/2008;	Letters and opinions	continuous (15 days per case)
H	New developments	Develop concepts, studies, new international material, papers, action plans and similar for satellite based systems and services (e.g. EGNOS, Galileo, Iris, sub-orbital aeroplane operations, UAS)	Letters; Papers for international events; Regulatory Agency's deliverables or preparatory material	continuous
		Set-up, maintaining of Community Safety Programme	CSP manual	continuous
		Project on consolidated version of IR 1702/2003 and 2042/2003	Revised consolidated versions	start in 2009 end in 2010

#	Area of activity	Actions	Deliverables	Average workload/year
I	Legal	Legal advice	Legal opinions Legal notes and discussion papers Legal review of all Agency's deliverables/measures/decisions Drafting support Participating in internal meetings with and without externals, external meetings, work groups, work shops, conferences	As requested or required
		Coordination and support to the Directorates	Internal meetings Concept discussions Reviewed documents etc. Providing legal training to staff	Regular meetings & ad-hoc meetings
		Public access to documents	Processing initial and confirmatory requests for public access to documents from the public Give advice on access to documents and confidentiality issues Internal training Management of the process	As requested or required
		Data protection	Processing data protection tasks Give advice on data protection Handling data protection situations/cases	As requested or required
		Defensive legal measures incl. litigation	Processing of complaints against EASA: <ul style="list-style-type: none"> ○ General/any ○ Code of Good Administrative Practice ○ SR art. 90 ○ Ombudsman Appeals against EASA's decisions: <ul style="list-style-type: none"> ○ Technical ○ Fees & Charges Any other challenge against EASA in court, before other tribunal or bodies Dispute resolution and litigation under Contracts	As requested or required

5. Annex 2 - Inventory tasks

5.1. R.2 – Environmental Protection Department - Inventory tasks

The inventory list in this field will be established in the subsequent years. So far, only two tasks have been foreseen for the inventory.

See "[Annex 2 - Inventory 2012-2015.pdf](#)"

5.2. R.3 – Flight Standards Department – Inventory tasks

See "[Annex 2 - Inventory 2012-2015.pdf](#)"

5.3. R.4 – Product Safety Department – Inventory tasks

See "[Annex 2 - Inventory 2012-2015.pdf](#)"

5.4. R.5 – ATM/Airport Safety Department – Inventory tasks

The inventory list in this field will be established in the subsequent years. The safety regulatory coordination with the SESAR JU programme and the safety advisory role of the Agency in the Single European Sky (SES) may in fact identify the need for additional rulemaking tasks. The few tasks already included in the Inventory are available in "[Annex 2 - Inventory 2012-2015.pdf](#)".