

EASA Reg (EU) 2017/373 IMPLEMENTATION WORKSHOP

11 June 2018

UK IMPLEMENTATION APPROACH

Dave Drake and Nick Thorpe, UK CAA

2017/373 (ATM IR) approach



- Cross-CAA implementation project.
- Each Annex has a Lead
- Leads form a Working Group
- Working Group and Leads overseen by Project Board
- Ensure effective communication with industry on implementation

Project Objective



- Fulfil CAA State duty by implementing EU legislation in a manner that maximises safety and economical benefits for the UK aviation industry, in a proportional manner for each of the +/- 60 ANSPs.
- For UK CAA to be compliant and to facilitate timely compliance of UK industry to 2017/373's provisions under the Authority's remit.
- Ensure the UK aviation industry is appropriately informed of the EU requirements delivering clear, up to date and proportionate documentation to facilitate UK implementation and compliance.
- Minimise economic impact of change.

Project Guiding Principles

- Implement IR using 2017/373 IR/AMC/GM
- Remove, reduce and refine current UK material, including process/procedures
- Create/update remaining UK material (AltMOC/GM) where considered appropriate (only in the absence of material not being available elsewhere)

Deliverables & Outcomes

- Gap analysis & bibliography
- Change Proposals
- Communication Plan
- Relevant ATM-IR material
- Internal Education & Information package
- Project Closure

Industry Consultative Group

- Create mutual CAA/industry awareness and understanding of the changes to requirements and the impacts of these resulting from the implementation of the ATM IR in the UK
- Provide a forum for discussion and informal consultation on changes required by ATM IR implementation to ensure those changes are proportionate and appropriate to the risk posed, and costs are identified and minimised
- Remain transparent to be open and keep regulations simple and user-friendly
- Industry members to represent their sector of the industry and to act as a liaison between the CAA and those whom they represent.

Specific issue 1: ATCO fatigue/rostering/psychoactive substances

- 60+ ANSPs
- Need consistent, cohesive basic approach
- Essentially evolve current provisions into AltMOC/GM
- Doesn't mean ANSPs don't devise policies in accordance with 373, need to provide a common basis
- Also maybe extension to non-ATCOs in the future (under consideration but much work to be done)

Specific issue 2: Compliance matrix approach

- 60+ ANSPs – each will need to demonstrate compliance with the regulation against each of the services they provide
- Matrix demonstrates how this is achieved
- Captures the necessary evidence – i.e. references to how ANSP compliance is claimed
- Oversight activities to know where to look in order to assess whether compliance in fact being achieved
- Exemplar matrices: [Annex III OR](#) and [Change Management](#)
- Happy to share once structure, content, etc, all finalised

Specific issue 3: Change management

- Need to fully understand evolution of change management requirements and how ANSPs of all shapes and sizes can satisfy 373
- Need to determine how the requirements can be satisfied by pragmatic and cost-effective means regardless of the nature of an ANSP
- Need to ensure all ANSPs understand the terminology associated with 373's change management requirements and how to apply these in a proportionate manner
- Identifying changes that require/do not require prior competent authority approval

Specific issue 4: ATSEP

- New to the UK
- Approach to ATSEP compliance under development
- Existing UK 'Personnel Technical Competence' scheme – to be replaced or not?
- Competent authority requirements for limited certificate holder (approximately 45 UK ANSPs expected to be eligible)
- Some technical requirements appear to be missing (e.g. remote tower technology)
- What does good/ compliance look like?

Specific issue 5: Certification/declaration (or not)

- UK service providers will be certificated – declaration possibility (e.g. certain FIS providers) will not be exploited
- Instead, UK will apply a proportionate approach to certification according to the nature of the organisation and the services being provided and risks being managed
- Has the advantage of maintaining one system – organisational benefits for the CAA
- Allows for effective approval/compliance/enforcement processes/procedures
- Provides consistent approach to ensuring continued safety of aviation ‘consumers’, principally the travelling public

Ongoing work

- Following publication of EASA's 'Opinions', CAA will undertake detailed analyses each in order to develop potential implementation options and understand the impacts and costs of these.
- CAA will continue to engage with EASA and European Commission on Parts-ATS, AIS and FPD post-NPA refinements, including:
 - bilateral meetings and participation in EASA-led thematic workshops.
 - further modifications to address issues raised by the CAA.
 - transitional arrangements affecting key UK issues.

Questions?