

# Management of Change

Florian Schur

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## Example – Keep in mind for discussion purposes

- Different aircraft need different nose wheel positions
- Management of change: Modification of a marked nose wheel position



# There are two change categories as per Regulation 139/2014



**Significant changes are clearly defined. For minor changes there is an “unspoken” reverse definition.**

## But requirements aimed at airports do not include guidance for differentiation

- IR level - ADR.OR.B.040 (f):
    - > “...the aerodrome operator proposing a change [...] shall...”
    - > four mandatory steps / components
  - AMC / GM level (sub-titles):
    - > “Changes requiring prior approval“
    - > “Changes requiring prior approval“
    - > “Assessment of changes”
    - > “Assessment of changes – LRST”
    - > “Assessment of changes – Runway Safety”
- No reference to different change categories
- Focus on significant changes



**No clear indication for the aerodrome operator on how to differentiate between changes that vary in terms of risk & complexity.**

# And the picture on the authority side is not that clear either

## Procedural steps for the management of significant changes

- > “...assess the application...”<sup>1</sup>
- > “... assess the proposed change in relation to the CB, and the applicable requirements of Part ADR.OR, Part ADR.OPS, as well as any other applicable requirements...”<sup>2</sup>
- > “...shall approve the change when [...] compliant with the requirements in ADR.OR.B.040 and, if applicable with ADR.OR.E.005...”<sup>3</sup>

## Procedural steps for the management of minor changes

- > “...assess the information provided in the notification [...] to verify their appropriate management and verify their compliance with the certification specifications and other appropriate requirements applicable to the change...”<sup>4</sup>
- > “...Criteria to be used include, but are not limited to...”<sup>5</sup>

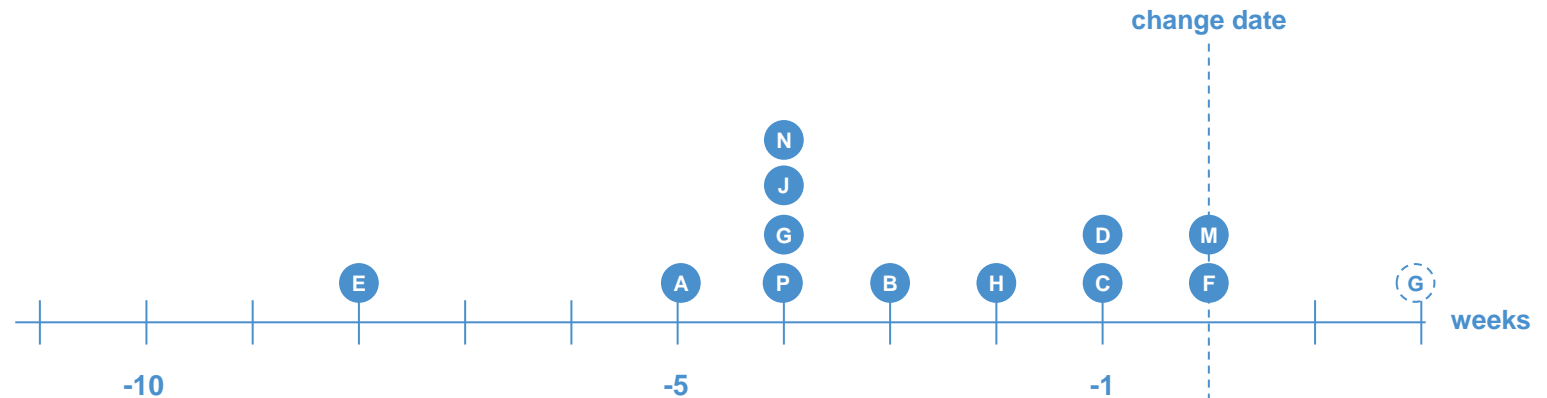


**Check criteria for the handling of significant and minor changes differ not that much from each other.**



# Furthermore, required preparation time may turn minor changes into significant ones

Notification period prior to the implementation of minor changes at different airports.  
(Time for preparation by aerodrome operator not included)



**A** Airport location



**Long(er) notification periods and internal preparation reduce the ability to quickly implement minor changes.**



# Remember? Modification of a nose wheel position (per definition a minor change)



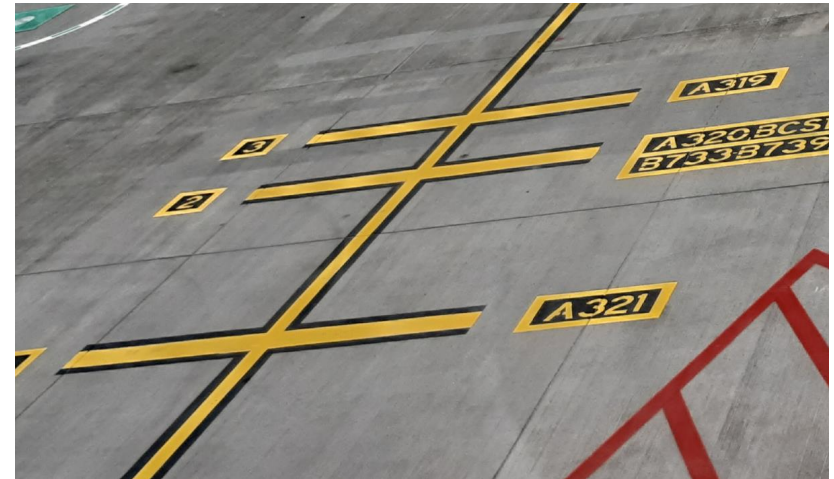
- Preparation of a “full scale” safety assessment by ADR operator



- Notification period: up to several weeks (depending on CA / local procedure)



- Additional checking obligations for the CA



Implementation of minor changes can be a major issue.

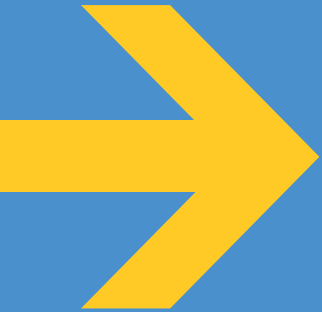
# Our plead: Encourage to differentiate

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- Practical differentiation between change categories
- Consider risk & complexity of the change
- Foster a safe & proportionate approach







# THANK YOU

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

[www.airportcarbonaccreditation.org](http://www.airportcarbonaccreditation.org)



# → Annex: Changes that require prior approval

| ADR.OR.B.040 / Changes  |  |  |  |
|---|--|--|--|
| (a)(1)  |  | (a)(2)   | (b)  |
| <u>„terms of the certificate“</u> <ul style="list-style-type: none"> <li>ICAO Location Indicators,</li> <li>conditions to operate (VFR/IFR, day/night),</li> <li>aeroplane operations on specially prepared winter runways,</li> <li>runway declared distances,</li> <li>runway types and approaches provided,</li> <li>aerodrome reference code,</li> <li>scope of aircraft operations with higher aerodrome reference code letter,</li> <li>provision of apron management services (yes/no),</li> <li>rescue and firefighting level of protection;</li> </ul> |  | <u>significantly affecting elements of the aerodrome operator's management system as required in ADR.OR.D.005(b)</u> | <u>„other changes requiring prior approval“</u> <ul style="list-style-type: none"> <li>Low-visibility procedures, and any changes thereto (ADR.OPS.B.045)</li> <li>Implementation of Alternative means of compliance (ADR.OR.A.015)</li> <li>Procedure for managing changes not requiring prior approval (ADR.OR.B.015)</li> </ul> |
| <u>Certification Basis</u> <ul style="list-style-type: none"> <li>Applicable Certification Specifications issued by the Agency</li> <li>EloS</li> <li>Special Condition</li> </ul>  |  |  |  |
| <u>Safety critical ADR equipment</u>  |  |  |  |

