



Explanatory Note to Decision 2019/023/R

AMC to Annex I (Part ATCO) to Commission Regulation (EU) 2015/340

Update of the air traffic controllers' initial training content

RMT.0668

EXECUTIVE SUMMARY

The objective of this Decision is to maintain a high and uniform level of safety by providing a set of harmonised measures for the initial training of air traffic controllers (ATCOs). This will be achieved through continued alignment of the qualification scheme for ATCOs with the evolution of the regulatory framework, the state of the art and the recognised best practices in aviation.

This Decision proposes an update of the training objectives in the ATCO basic and rating training syllabi in order to ensure maintenance and improvement of the harmonised initial training content by aligning it with EU regulations and ICAO provisions. Most of the amendments are of editorial nature and updates of regulatory references.

More precisely, this Decision proposes amendments to the set of the acceptable means of compliance (AMC) to Annex I (Part ATCO) to Commission Regulation (EU) 2015/340. It will facilitate the ATCO training organisations to align the training content with EU regulations that have been published after the first issue of the AMC in 2015.

Action area:	Regular updates		
Affected rules:	AMC to Annex I (Part ATCO) 'Requirements for the licensing of air traffic controllers'		
Affected stakeholders:	ATCO training organisations; competent authorities		
Driver:	Efficiency/proportionality	Rulemaking group:	No
Impact assessment:	No	Rulemaking Procedure:	Accelerated procedure

EASA special rulemaking procedure milestones

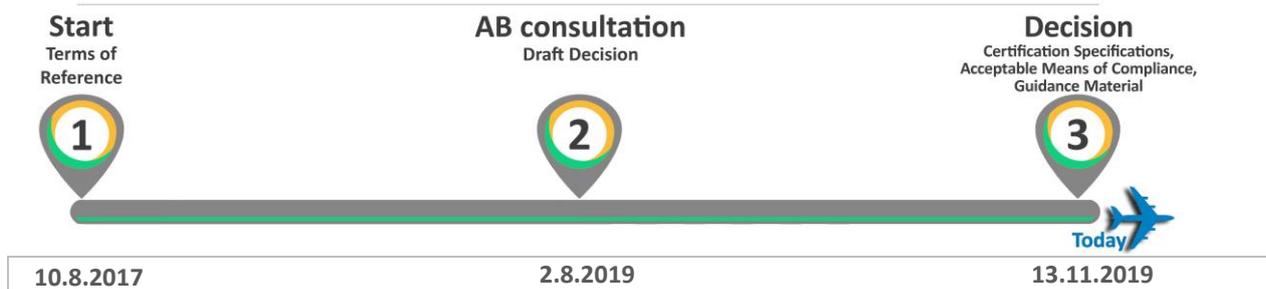


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1. About this Decision

The European Union Aviation Safety Agency (EASA) developed this Decision in line with Regulation (EU) 2018/1139¹ (the ‘Basic Regulation’) and the Rulemaking Procedure². This rulemaking activity is included in the European Plan for Aviation Safety (EPAS) for 2019–2023³ under rulemaking task (RMT).0668⁴. The scope and timescales of the task were defined in the related Terms of Reference⁵.

The draft text of this Decision has been developed by EASA with the support of EUROCONTROL. It has undergone consultation with the Advisory Bodies (ABs) in accordance with Article 16 ‘Special rulemaking procedure: accelerated procedure’ of MB Decision No 18-2015. EASA reviewed the comments received during the AB consultation, and they are summarised in Section 2.4.

¹ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139>).

² EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the ‘Rulemaking Procedure’. 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>).

³ https://www.easa.europa.eu/document-library/general-publications?publication_type%5B%5D=2467

⁴ https://www.easa.europa.eu/sites/default/files/dfu/EPAS_2019-2023%20final.pdf

⁵ <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0668>



2. In summary — why and what

2.1. Why we need to change the AMC — issue/rationale

The aviation industry is complex and rapidly evolving. The corresponding rules need to be updated regularly to ensure that they are fit for purpose, cost-effective, can be implemented, and are in line with the latest International Civil Aviation Organization (ICAO) Standards and Recommended Practices (SARPs) and with the EU regulatory framework. Regular updates are issued when relevant data is available following an update of industry standards or feedback from certification activities or minor issues raised by the stakeholders.

The ATCO initial training content was first issued with ED Decision 2015/010/R on 16 March 2015⁶. The main reason for this amendment (Amendment 3) is the introduction of newly published EU rules on areas that affect the ATCO training objectives. In addition, minor changes of non-controversial nature are required to amend the terminology in order to ensure consistency with ICAO Annex 1 ‘Personnel Licensing’ Amendment 175, and to improve the wording.

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. This proposal will contribute to the achievement of the overall objectives by addressing the issues outlined in Section 2.1.

The specific objective of this proposal is to maintain a high and uniform level of safety by providing a set of harmonised measures for the initial training of ATCOs. This will be achieved through continued alignment of the qualifications scheme for ATCOs with the evolution of the regulatory framework, the state of the art and the recognised best practices in aviation.

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

With the publication of the initial issue of the AMC & GM to Commission Regulation (EU) 2015/340 in 2015, EASA was already aware of the need to maintain the ATCO initial training requirements. Therefore, the subject RMT.0668 was established through which the affected stakeholders (authorities, air navigation service providers (ANSPs), ATCO training organisations, professional organisations and other relevant international organisations) will play a major role in defining and drafting the necessary amendments.

This ‘maintenance’ task takes into account the amended legal framework of the ATCO initial training content and, therefore, an appropriate mechanism was deployed to collect implementation feedback on the updated training material that also allows identifying the possible needs for updates, as well as any new area that needs to be covered by the training material. Furthermore, concrete proposals from stakeholders via the EASA ABs are also a key contributor to the identification of such needs.

In this context, and also based on the working arrangements between EASA and EUROCONTROL, a phased approach for the review and maintenance of the ATCO initial training syllabi was agreed. During Phase 1, EASA and EUROCONTROL analysed the elements identified during the initial consultation process that were of non-controversial nature and for which a proposed amendment was desired at a suitable time, and developed appropriate regulatory proposals. In practice, the work

⁶ <https://www.easa.europa.eu/document-library/agency-decisions/ed-decision-2015010r>

related primarily to the general review of the initial training requirements versus the rules that have been introduced since 2015, with the aim of updating the references in the training objectives, amending the terminology as necessary, and removing typos and inconsistencies (if any). Changes of a more substantial nature that could lead to amendments to Commission Regulation (EU) 2015/340 will be addressed during Phase 2 (beyond 2020).

In November 2018, EUROCONTROL reactivated the ATCO CCC Training Task Force (TF) consisting of 12 training experts and regulators from 6 Member States, EUROCONTROL and EASA. The TF reviewed nearly 300 change requests received by EASA or EUROCONTROL and proposed amendments accordingly.

2.4. What are the stakeholders' views

The AB consultation of the draft text resulted in 233 comments from 7 different stakeholders. Only 74 of the comments were on the proposed text changes and the rest were either general statements, questions or amendment proposals. A large number (53) of the comments were on editorial errors and formatting, and a major part of them on the list of abbreviations, which were corrected.

Another large number of comments addressed the optional versus mandatory content of the training objectives, and the placement of the objectives in the training structure.

As regards the comments on the optional versus mandatory content of the training objectives, most of these comments were not accepted as they were not considered justified.

As regards the comments on the placement of the objectives, it was considered that the order of the syllabi is non-binding and it is up to the training organisations to provide the training in the preferred order. Consequently, it was not considered necessary to introduce changes in the structure of the training objectives.

The TF proposed the introduction of the references to the future Part-ATS by referring to Commission Implementing Regulation (EU) 2017/373⁷ in the content of the objectives. However, as Part-ATS has not been adopted by the Commission at the time of publication of this Decision, the references are removed and the ones to ICAO Doc 4444 and Annex 11 are instead kept.

The comments that did not address this amendment (Amendment 3) and that were not within the scope of this update, and whose purpose was to update regulatory references and improve the wording shall be considered during Phase 2 (as indicated in Section 2.3 above).

2.5. What are the expected benefits and drawbacks of the proposals

When amending the content of the initial training in the AMC, it was necessary to carefully assess the EU legislation that is already in place or will become applicable in the near future against the content of the training objectives. In doing so, only the necessary adjustments have been made by associating the requirements with the rules laid down in Commission Implementing Regulation (EU) 2017/373 without detriment to the principles preserved.

Consequently, the impact of the proposal is considered to be low, and for this reason no impact assessment (IA) has been developed.

⁷ Commission Implementing Regulation (EU) 2017/373 of 1 March 2017 laying down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight, repealing Regulation (EC) No 482/2008, Implementing Regulations (EU) No 1034/2011, (EU) No 1035/2011 and (EU) 2016/1377 and amending Regulation (EU) No 677/2011 (OJ L 62, 8.3.2017, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1570803245118&uri=CELEX:32017R0373>).

EASA has already performed an IA on the licensing and medical certification of air traffic controllers. Please refer to Section 2.4 ‘Summary of the Regulatory Impact Assessment’ of Opinion No 11/2013 of 2 December 2013⁸.

⁸ <https://www.easa.europa.eu/document-library/opinions/opinion-112013>



3. How do we monitor and evaluate the rules

The impact assessment (IA) conducted for RMT.0153 (ATM.003(a)) & RMT.0154 (ATM.003(b)) was presented in NPA 2012-18 'Licensing and medical certification of air traffic controllers', published on 12 November 2012⁹. EASA will monitor and evaluate the implementation of the AMC and GM through regular standardisation activities. In addition, the monitoring of the proposed changes will be carried out through regular feedback received from the EASA Advisory Bodies. Through this input, it will be assessed how efficiently the adopted AMC have been or are currently applied.

Note: With this Decision, EASA proposes mainly updates of regulatory references to reflect the current status quo.

⁹ <https://www.easa.europa.eu/document-library/notices-of-proposed-amendments/npa-2012-18>



4. References

4.1. Related regulations

- 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 (OJ L 63, 6.3.2015, p. 1)

4.2. Affected decisions

- Executive Director Decision 2015/010/R of the Executive Director of the Agency of 13 March 2015 adopting Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) 2015/340

4.3. Other reference documents

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

