

# Management of Change

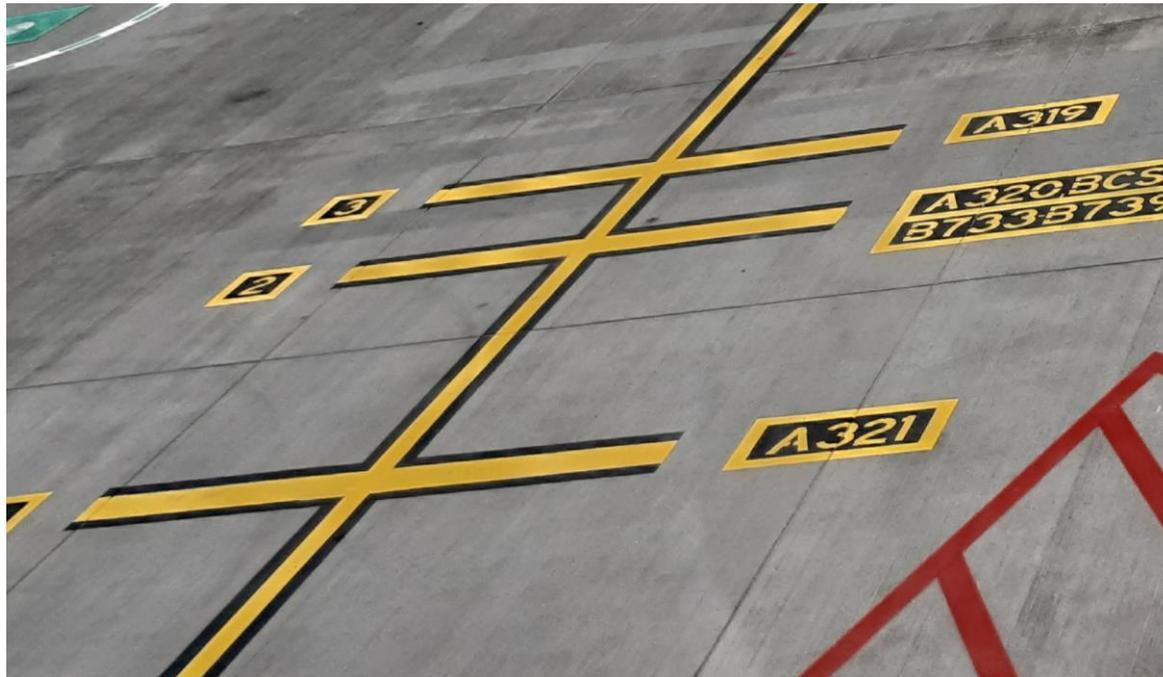
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6th April, Workshop with EASA



# 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

No reference to different change categories

- 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"

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>

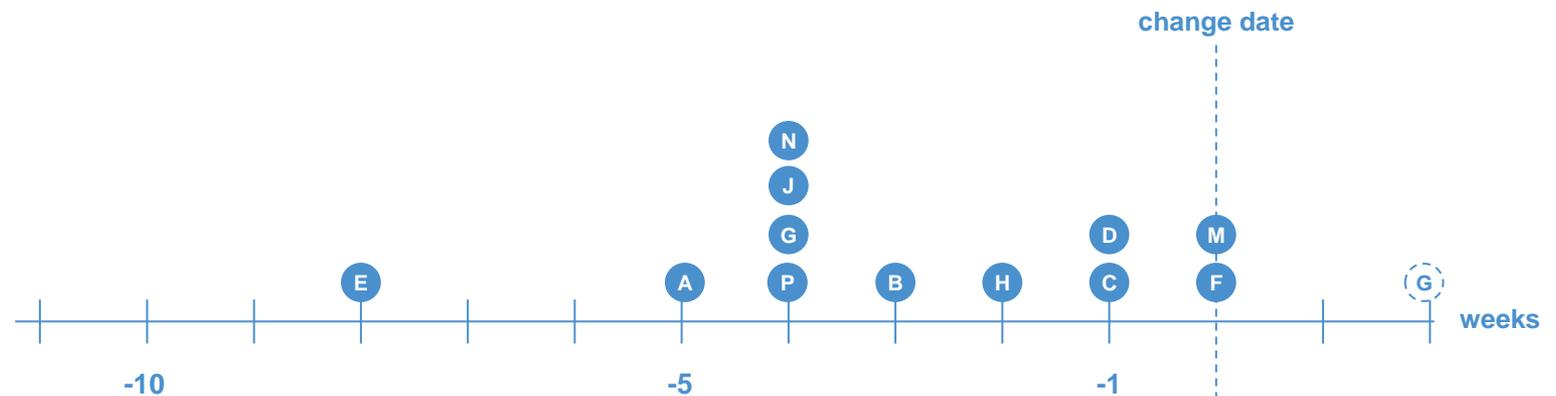


**Check criteria for the handling of significant and minor changes differ not that much from each other.**



# 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)



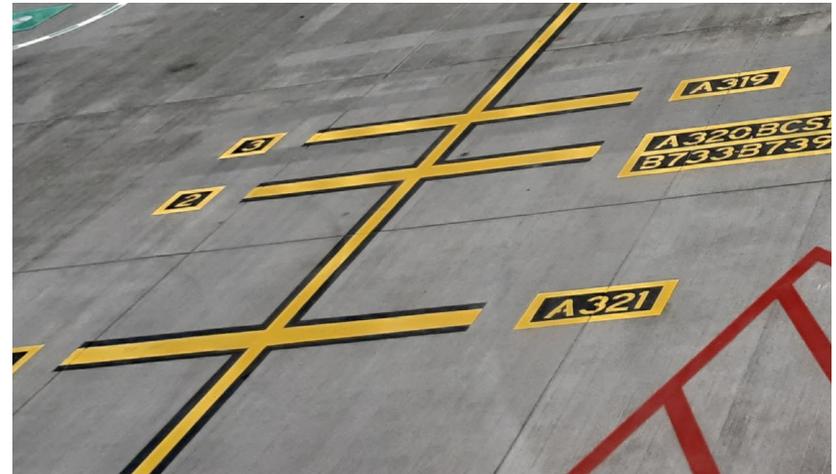
- Preparation of a “full scale” safety assessment by ADR operator



- 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.

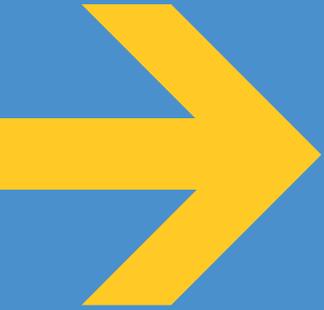


# Our plead: Encourage to differentiate

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

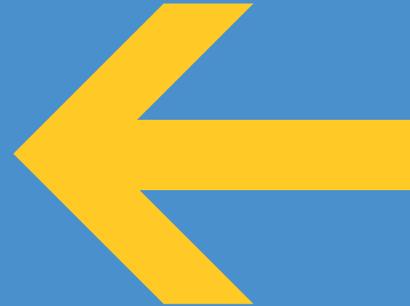




# THANK YOU

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

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# → Annex: Changes that require prior approval

ADR.OR.B.040 / Changes		
(a)(1)	(a)(2)	(b)
<p><b><u>„terms of the certificate“</u></b></p> <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>	<p><b><u>Certification Basis</u></b></p> <ul style="list-style-type: none"> <li>▪ Applicable Certification Specifications issued by the Agency</li> <li>▪ EloS</li> <li>▪ Special Condition</li> </ul> <p><b><u>Safety critical ADR equipment</u></b></p>	<p><b><u>„other changes requiring prior approval“</u></b></p> <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>

