

The Regulatory Experience

EASA GRF webinar

01 March 2023

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GRF implementation

The ATM perspective

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GRF implementation - the ATM perspective

- Initially, Appendix 3 to Part AIS of Reg. 2017/373 was replaced by Commission Implementing Regulation (EU) [2021/1338](#), to address certain inconsistencies
 - (*items F, G, J, N, P, R, S*) between SNOWTAM format and instructions were addressed
- In parallel, GRF initial implementation review and feedback showed:
 - inconsistencies between PANS-AIM and PANS-AGA, resulting in non-issuance of SNOWTAM despite an operational need
 - inconsistent approach, at ICAO level, towards PANS-AIM and other GRF-related ICAO Annexes as to AIP structure/content to support GRF implementation
 - excessive SNOWTAM origination/issuance in initial implementation phase
 - the need for further review of ICAO Annex 11 and PANS-ATM to fully align certain terminology with regards to GRF

GRF implementation - the ATM perspective

- To address these issues EASA initially issued 3 SIB
 - [SIB 2021-11](#) – AIP content
 - AD 1.2, AD 1.2.2 and AD 2.7
 - [SIB 2021-12](#) – ATIS use
 - GRF-related ATIS messages: including meaning of “*significant runway surface conditions*”; non provision of “*braking action*” or “*friction measurements*”
 - [SIB 2021-15](#) – SNOWTAM
 - reminder of the need to meet certain conditions for legally originating / issuing a SNOWTAM; impact on the NOTAM system

GRF implementation - the ATM perspective

- EASA also proposed the amendment of:
 - Regulation 2017/373 regarding the AIP content
 - Regulation [2022/938](#) amended: AIP sections AD 1.2, AD 1.2.2 and AD 2.7; SNOWTAM instructions item E and item J5
 - the SERA Regulation, through [NPA 2022-04](#)
 - *SERA.9010 ATIS; SERA.12020 Exchange of air-reports; Appendix 5 Technical specification related to aircraft observations and reports by voice communications*
 - *need for further guidance of the content of the ATIS message to be kept as short as possible*
- ?  ?
- Considering the relevant regulatory framework, one of our ANSPs is proposing to provide - when disseminating the information via voice communication - only the RWYCC whereas the other items of RCR (e.g. contaminant coverage, type, depth ...) are disseminated only upon request. As far as we know a similar approach has been adopted by other ANSPs in Europe and accepted by the relevant NAAs.

In this respect we would like to know if, from EASA's viewpoint, the above mentioned approach is considered to be acceptable.

EASA answer was 'YES'

GRF implementation - the ATM perspective

- EASA has also reviewed the ATS rules to ensure consistency of the terms used in various regulatory material and the need for certain amendments
 - GM2 ATS.TR.210(a)(3)
 - AMC1 ATS.TR.210(c)(2) ii
 - GM2 to AMC16 ATS.TR.210(a)(3)
 - AMC9 ATS.TR.210(c)(2)(i)
 - AMC1 ATS.TR.305

Internal consultation with OPS/ADR completed; next step to follow the rulemaking procedure

- EASA is also aware of other issues / discussions concerning:
 - item T of the SNOWTAM format (work in progress in this area)
 - impact of non-updated RCR by aerodrome operators (EASA found no need for rule review)
 - clarity as to the applicability of the ATM/ANS GRF-related rules, considering the scope of the EU ADR and Air-OPS rules (EASA does not consider there is a need for additional regulatory material)

GRF implementation - the ATM perspective

→ Conclusions

- From an ATM/ANS view point, EASA has provided implementation support whenever necessary, following a holistic approach
 - implementation challenges found in both the AIS and ATS domains
- EASA has tried to address identified issues at the regulatory level
 - regulatory challenges resulting directly from ICAO material, showing that not all necessary regulatory changes had been identified during the ICAO GRF concept development
 - unlike the EU, certain issues have not yet been fully resolved at the ICAO level
 - upcoming regulatory changes envisaged to fully address all pending issues at the EU level
- Certain issues may not be dealt with only at the EU regulatory level
 - close cooperation between all actors is required at the State level to ensure proper implementation of the GRF concept

Aerodrome survey regarding GRF implementation

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Implementation of GRF, a complex task

- System (cross-domain) effort
 - Coordination between different domains
 - ATM/ANS, ADR, OPS
- NCAs' management of change
 - need for cross-domain approach
 - promotion and support (meetings, webinars, trials)
 - training of personnel
 - update of oversight programmes (and documents)
 - assessment of changes proposed by operators
 - update of aeronautical information (AIP AD 1.2)

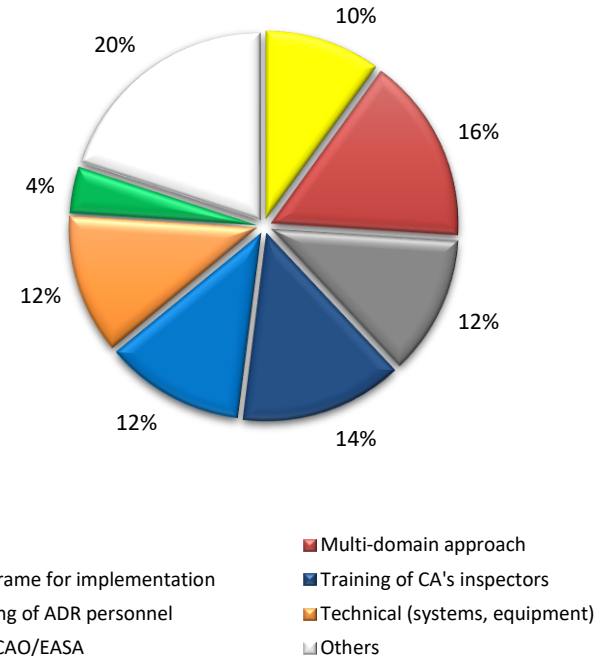
Survey on implementation of GRF

- Survey launched in Sep. 2022
- All (27+3) MS replied
- overview of the state-of-the-art of implementation
- Outcome of the survey
 - (timely) implementation achieved by all MS
 - consistent implementation reported by most NCAs
 - although with some challenges
 - overall positive feedback gained



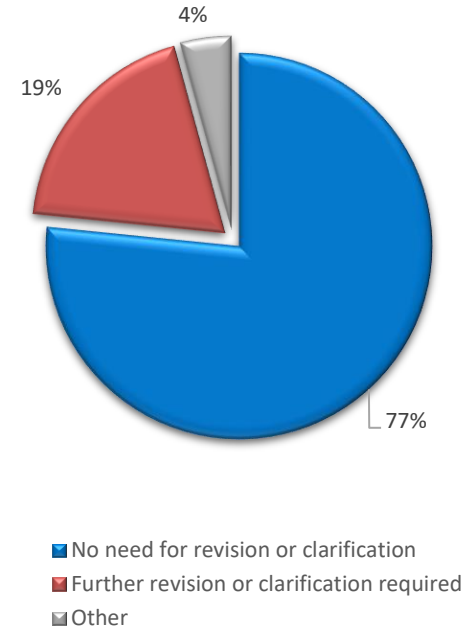
Implementation challenges

- NCAs reported implementation challenges, rel. to
 - effort for multi-domain approach
 - coordination with different stakeholders
 - training
 - NCA's personnel
 - Aerodrome personnel
 - technical issues
 - systems, equipment
 - timeframe for implementation
 - covid-related issues



NCAs' opinion ...

- NCAs' opinion about GRF rules (EASA Survey)
 - most NCAs satisfied with the rules (> 75%)
 - no need for clarification and/or
 - no need for change
 - comments received by some NCAs (approx. 20%)
 - further revision or clarification proposed



NCAs' opinion ...

→ Main comments received

→ RCR

- max validity of RCR (when not issued via SNOWTAM)
- excessive amount of information included in the RCR
- Integration of RCR into ATIS

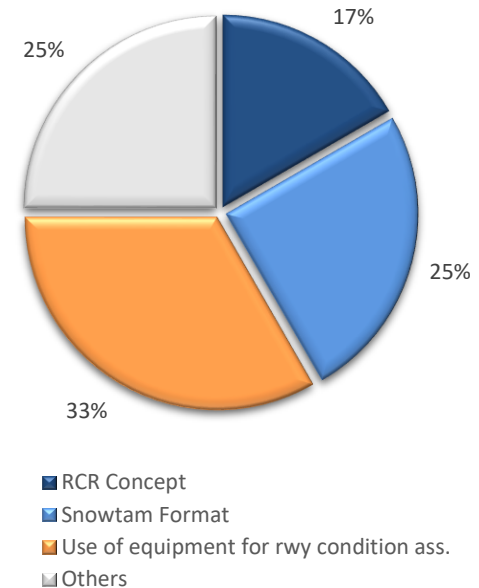
→ SNOWTAM

- use of NOTAM/SNOWTAM for slippery wet RWYs (clar.)
- further guidance on the two sections of SNOWTAM
- cancellation of SNOWTAM for dry runways

→ Tools and Equipment

- e.g. tools for water depth measurement,
- use of Data Link for transmission of SNOWTAM

Comments per topic / area

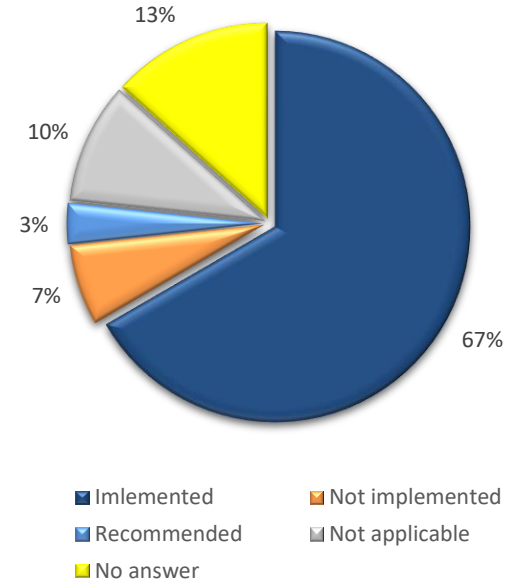


GRF implementation at exempted ADRs

- GRF implementation status at exempted ADRs (and ADRs out of the scope)
- Different approach among MS
 - Most MS apply GRF at exempted ADRs and, in some cases, also at ADRs out of scope*
 - through adoption of specific regulatory acts or
 - by direct implementation (without formal framework)
 - Some MS recommend adoption of GRF for such ADRs
 - Very few cases where GRF is not implemented

* Subject to certain conditions, e.g.: certification, provision of ATS, CAT, etc.

Implementation at exempted ADRs
(and ADRs out of the scope)



GRF implementation

The OPS perspective

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GRF implementation - The OPS perspective

- Entry into force **12.08.2021**
 - LDTA assessment based on the RCR
 - Use of specific LDTA performance data
 - Pilot reports (AIREP) of braking action

- Feedback received from **Operators and CAs**
 - Generally positive
 - Availability of LDTA performance data for old designs or specific cases
 - The reporting format is not always applied consistently in all countries/airports

Questions?

easa.europa.eu/connect



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