



## Comment-Response Document 2015-09

# Rescue and firefighting services — remission factor, cargo flights, etc.

CRD TO NPA 2015-09 — RMT.0589 — 23.5.2016

Related Decision 2016/009/R

### EXECUTIVE SUMMARY

This Comment-Response Document (CRD) contains the comments received on notice of proposed amendment (NPA) 2015-09 (published on 9 July 2015) and the responses, or a summary thereof, provided thereto by the Agency.

Based on the comments and responses, Decision 2016/009/R was developed.

Applicability		Process map	
Affected regulations and decisions:	ED Decision 2014/012/R	Terms of reference (ToR), Issue 1:	10.4.2014
Affected stakeholders:	Aerodrome operators	Concept paper (CP):	No
Driver/origin:	Safety/proportionality and cost-effectiveness	Rulemaking group (RMG):	Yes
Reference:	N/a	Regulatory impact assessment (RIA) type:	Light
		Technical consultation during notice of proposed amendment (NPA) drafting:	Yes
		NPA publication date:	9.7.2015
		NPA consultation duration:	3 months
		Review group (RG):	No
		Focused consultation:	No
		Decision publication date:	23.5.2016



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## 1. Procedural information

### 1.1. The rule development procedure

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed this CRD in line with Regulation (EC) No 216/2008<sup>1</sup> (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure<sup>2</sup>.

The rulemaking activity is included in the Agency's [5-year Rulemaking Programme](#) under RMT.0589. The scope and timescales of the task were defined in the related [ToR](#).

The draft acceptable means of compliance (AMC) and guidance material (GM) have been developed by the Agency based on the input of RG RMT.0589. All interested parties were consulted through [NPA 2015-09](#)<sup>3</sup>, which was published on 9 July 2015. The Agency received a total of 111 comments from interested parties, including national aviation authorities (NAAs), aerodrome operators and aerodrome associations, aircraft operators and aircraft operators' associations, as well as social partners and General Aviation (GA) associations.

The text of this CRD has been developed by the Agency.

The process map on the title page contains the major milestones of this rulemaking activity.

### 1.2. The structure of this CRD and related documents

This CRD provides a summary of comments and responses as well as the full set of individual comments (and responses thereto) received on NPA 2015-09. The resulting rule text is annexed to ED Decision 2016/009/R.

### 1.3. The next steps in the procedure

The Decision containing the associated AMC and GM will be published by the Agency concurrently with this CRD.

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<sup>1</sup> Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1).

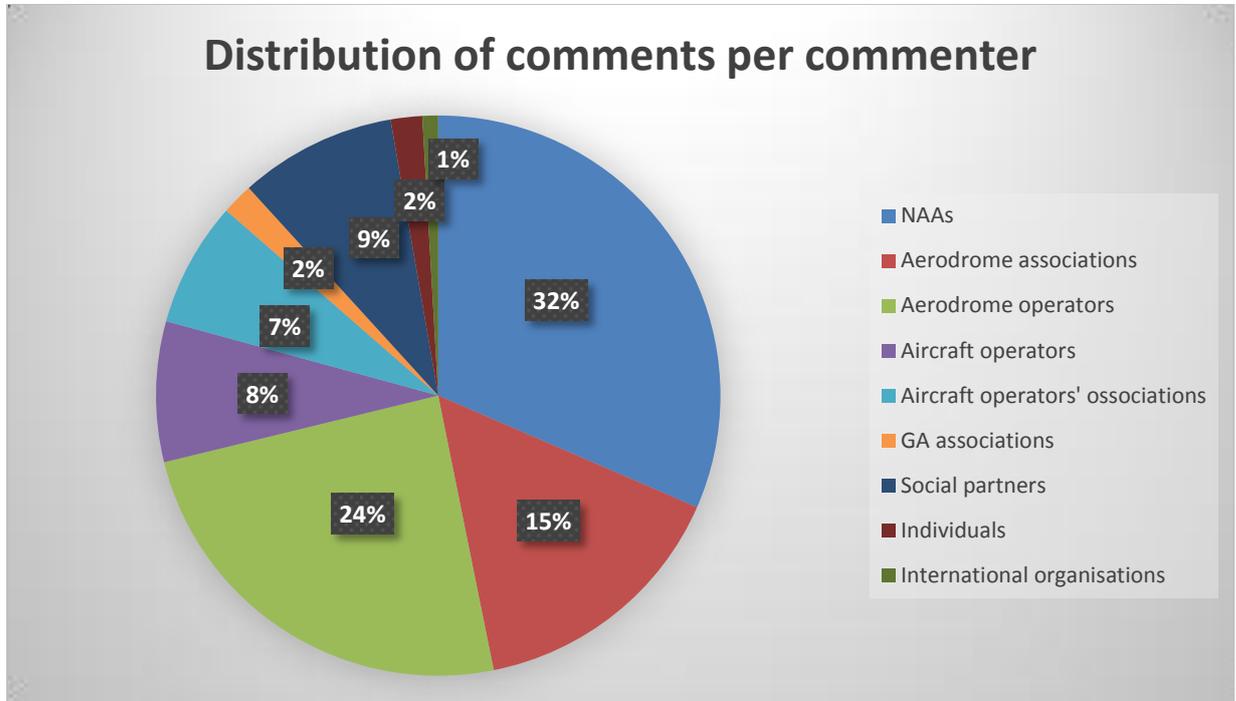
<sup>2</sup> The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'. See Management Board Decision 01-2012 of 13 March 2012 concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material (Rulemaking Procedure).

<sup>3</sup> In accordance with Article 2 of the Basic Regulation and Articles 5(3) and 6 of the Rulemaking Procedure.

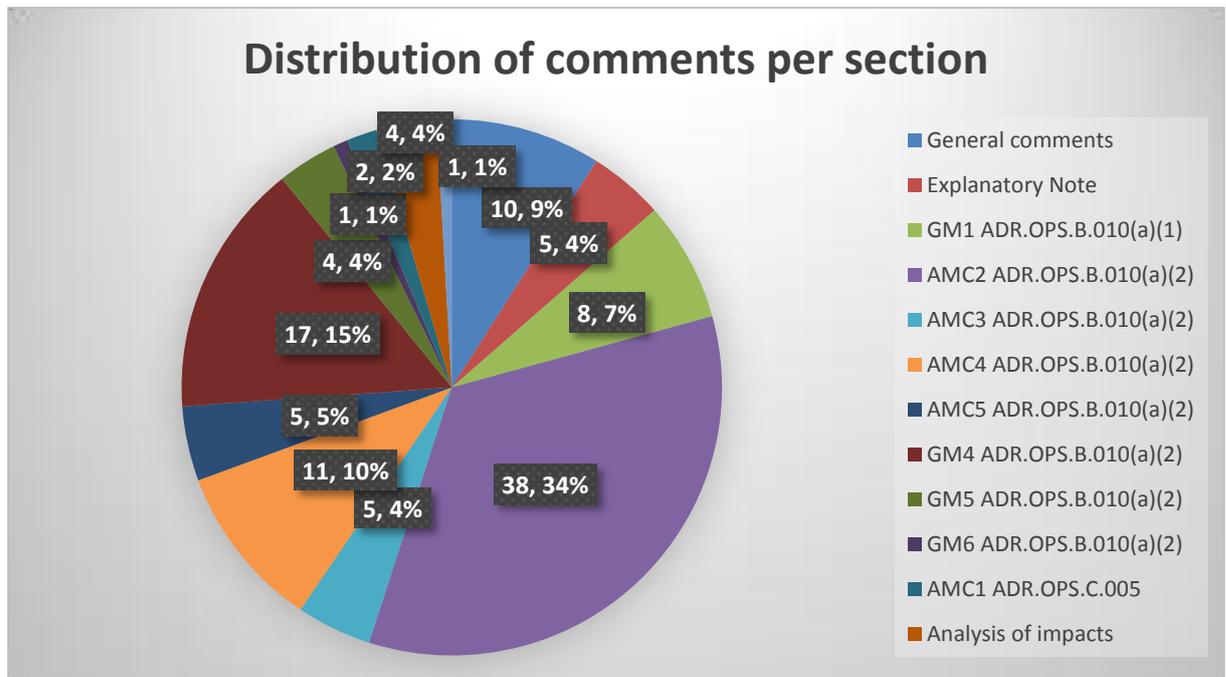


## 2. Summary of comments and responses

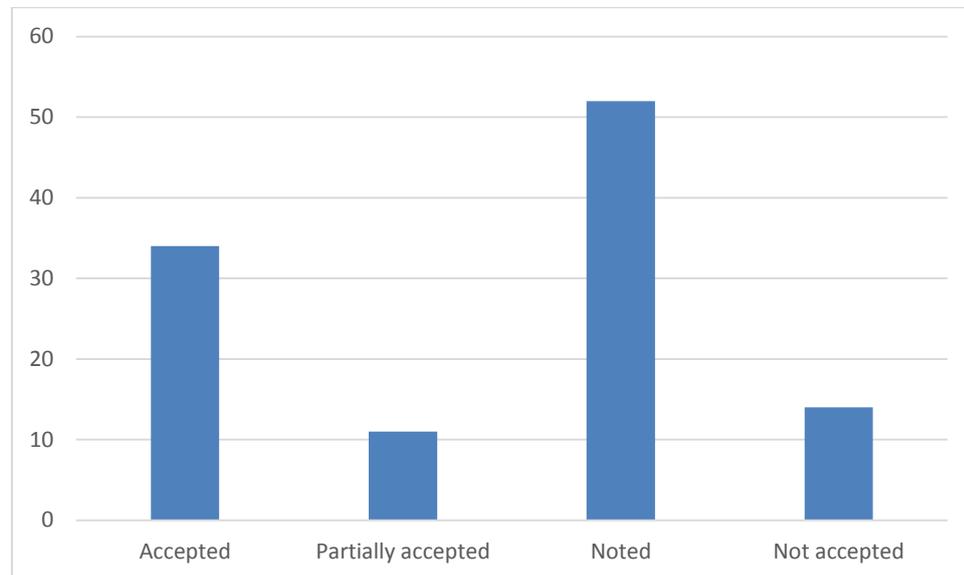
A distribution of the comments received by each category of commentators is shown in the following graph:



Additionally, a distribution of the comments received per section of the NPA is shown in the following graph:



All the comments were responded to using one of the following options: 'Accepted', 'Partially accepted', 'Noted' and 'Not accepted' with the below distribution:



The majority of the comments received were supportive of the proposed changes and most of the commentators were asking for clarifications.

The most commented part was AMC4 ADR.OPS.B.010(a)(2) that dealt with the RFF level of protection that has to be provided at an aerodrome. This was expected since this AMC is the core of the NPA. The proposed text received a wide acceptance by aerodrome operators and NAAs because it proposes a more pragmatic approach to determine the level of protection of rescue and firefighting services (RFFS) at aerodromes based on the traffic levels and the type of flights without degrading the level of safety, but allowing an optimisation of the use of available resources.

Aeroplane operators were concerned that the amended text will regulate flight operations, and requested the Agency to follow the same principle as the International Civil Aviation Organization (ICAO) which states that the requirements of Annex 14 for aerodromes do not regulate flight operations. The Agency is of the opinion that the already existing and the proposed text do not change the allocation of responsibilities between the aeroplane operator and the aircraft operator. Nevertheless, in case the RFF level of protection provided at an aerodrome is lower than the aircraft category, it is the responsibility of the aeroplane operator to coordinate with the aerodrome operator (in line with ICAO Annex 6, Part I, Attachment J, 3.1.1.1).

Another issue that triggered some comments on the same AMC was the Agency's proposal that an aerodrome operator should always accept an aeroplane being in an emergency situation irrespective of the RFF level of protection and the aircraft category. The intention of the Agency was to ensure that the aircraft will not be denied the use of the aerodrome, considering also the fact that it is the responsibility of the pilot-in-command to decide which aerodrome will be used. In that respect, some aeroplane operators expressed their concern that the proposed text could lead to cases where aerodrome operators may refuse to accept an aeroplane being in an emergency situation. Obviously, this is not the intention of the Agency, and the text has been revised to provide more clarity.



The Agency's proposal includes also a new table for the categorisation of RFFS of aeroplanes used for all-cargo, training, ferry, maintenance, etc. and, generally speaking, those aircraft where the only occupants are associated with flight duties. ICAO, in the latest edition of Doc 9137, Part I, Rescue & Fire-Fighting, provided a table for such type of flights where the aeroplane RFF category is lower compared with the category of the same type of aeroplane operating on a passenger flight. Some aeroplane operators requested the Agency to further downgrade the aeroplane category; however, the Agency decided to follow the ICAO proposal.



### 3. Draft AMC/GM

The newly developed or amended AMC/GM are annexed to ED Decision 2016/XXX/R.



## 4. Individual comments and responses

In responding to comments, a standard terminology has been applied to attest the Agency's position. This terminology is as follows:

- (a) **Accepted** — The Agency agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — The Agency either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — The Agency acknowledges the comment but no change to the existing text is considered necessary.
- (d) **Not accepted** — The comment or proposed amendment is not shared by the Agency.

### (General comments)

-

comment

1

comment by: *British Airways Flight Operations*

British Airways welcomes the review of the RFFS material intended for aerodrome operators. However, we wish to sound something of a cautionary note. It should be borne in mind that the level of risk is different for the aerodrome operator from that of an aircraft operator, particularly when an aircraft operator only has few movements to a particular aerodrome. Moreover, RFFS provisions make no direct contribution to the safety of an individual flight, being provided to rescue persons and property in the event of an accident. It is, consequently, the responsibility of an aircraft operator to ensure that RFFS provision is adequate for a flight; and an aircraft operator's assessment of adequacy may be different - probably will be different in fact - from an aerodrome operator's.

In that context, we note once more the most important statement contained right at the beginning of ICAO Annex 14:

#### **CHAPTER 1. GENERAL**

*Introductory Note.— This Annex contains Standards and Recommended Practices (specifications) that prescribe the physical characteristics and obstacle limitation surfaces to be provided for at aerodromes, and certain facilities and technical services normally provided at an aerodrome. It also contains specifications dealing with obstacles outside those limitation surfaces. **It is not intended that these specifications limit or regulate the operation of an aircraft.***

My emphasis of the last sentence. Consequently, nothing in the material published should imply directly or indirectly that an aerodrome operator should be able to deny an aircraft operator permission to operate based solely on RFFS levels.

response

*Partially accepted*

The requirements for RFFS at aerodromes are described in ICAO Annex 14. The aerodrome RFF category is based on the longest aeroplane using the aerodrome. The level of protection provided could be one level below that of the aerodrome category when the number of aeroplanes' movements normally using the aerodrome is less than 700 during the three busiest consecutive months, or equal to the aeroplane RFF category during periods of anticipated low traffic.

ICAO Annex 6, Point 4.1.4 requires that an operator shall, as part of its safety management system, assess the level of RFFS protection available at any aerodrome intended to be specified in the operational flight plan in order to ensure that an acceptable level of protection is available for the aeroplane intended to be used. This information shall be contained in the operations manual.

ICAO Annex 6, Attachment J, provides guidance to the operators on how to determine the required level of protection. The main principle in the guidance is that the published RFFS aerodrome category should be at least equal to or greater than the aeroplane RFFS category. Nevertheless, it is also acceptable to use an aerodrome where the aerodrome RFFS category is one level below the aeroplane RFFS category.

The Agency would also like to refer to ICAO Annex 6, Attachment J, Point 3.1.1.1 where it is stated that intended operations to aerodromes with RFFS categories below the levels specified in ICAO Annex 14, Volume I, Chapter 9.2 should be coordinated between the aeroplane operator and the aerodrome operator.

comment	3	comment by: <i>EUROCONTROL</i>
	The EUROCONTROL Agency does not have comments on NPA 2015-09.	
response	<i>Noted</i>	
comment	27	comment by: <i>CAA-NL</i>
	CAA The Netherlands welcomes this EASA proposal as it provides clarifying and adequate guidance on the provision on RFFS. The introduction of a new method of determining the RFFS level of protection for aeroplane operations without passengers on board reflects the current practice in The Netherlands.	
response	<i>Accepted</i>	
	The Agency appreciates the support of CAA The Netherlands.	
comment	29	comment by: <i>Federal Office of Civil Aviation (FOCA), Switzerland</i>
	The Federal Office of Civil Aviation (FOCA) appreciates the opportunity to comment on this	



	NPA. The FOCA supports the clarification of RFFS level of protection at less than 700 movements in the busiest consecutive three months, all-cargo, mail, ferry, training, test operations, number of RFFS vehicles and rescue equipment, extinguishing agents, response time and unforeseen reduction of RFFS level of protection.
response	<i>Accepted</i>  The Agency appreciates the support of the Federal Office of Civil Aviation (FOCA).
comment	36 <span style="float: right;">comment by: <i>Swedish Transport Agency</i></span>  Please be advised that the Swedish CAA have no comments on the NPA.
response	<i>Noted</i>
comment	67 <span style="float: right;">comment by: <i>ACI EUROPE</i></span>  ACI EUROPE is firmly supportive of this document and looks forward to seeing the amendments it contains adopted as part of the Aerodrome Rules. The comments that follow are derived from our member's comments and aim at clarifying the text to render its implementation easier and more effective.
response	<i>Accepted</i>  The Agency appreciates the support of ACI EUROPE.
comment	85 <span style="float: right;">comment by: <i>CAA Norway</i></span>  CAA-Norway do not have any comments to the NPA 2015-09.
response	<i>Noted</i>
comment	106 <span style="float: right;">comment by: <i>Estonian Civil Aviation Administration</i></span>  It would help to have information about the minimum amount of rescuers aerodrome has to have according to the aerodrome category
response	<i>Noted</i>  GM2 ADR.OPS.B.010(a)(2) provides guidance on the number of personnel required to provide RFFS. The number of personnel depends on the types of aircraft operating at the aerodrome, the available RFF vehicles and equipment, as well as the duties of RFFS personnel. The Agency follows the same approach as ICAO, by introducing the 'Task and



Resource Analysis' to determine the required resources. Further information on how to conduct a 'Task and Resource Analysis' is contained in ICAO Doc 9137, Part 1, Fourth Edition, 2014.

comment 107

comment by: *Urząd Lotnictwa Cywilnego Poland*

In order to ensure consistent application of the provisions of EU regulations to all Member States, having in mind difficulties concerning application of soft-law in some UE countries we would like to point out that in the part that concerns the RFFS issues in our opinion it is necessary to up-grade following provisions from GM to AMC:

**GM4 ADR.OPS.B.005(a)**

**GM2 ADR.OPS.B.005(c)**

**GM4 ADR.OPS.B.010(a)(2)**

**GM5 ADR.OPS.B.010(a)(2)**

**GM1 ADR.OPS.B.010(a)(3)**

The aforementioned amendments shall provide consistent application of EU regulations.

response *Noted*

GM4 ADR.OPS.B.005(a) and GM2 ADR.OPS.B.005(c) deal with aerodrome emergency planning issues which were out of the scope of this NPA. Nevertheless, the Agency takes note of this proposal and, in the future, will assess whether or not is required to upgrade these two GM to AMC level.

GM4 ADR.OPS.B.010(a)(2) has been revised, and the part related to the application of the 'remission' factor has been moved to AMC2 ADR.OPS.B.010(a)(2). We consider that the remaining text provides guidance, therefore, we propose to retain it as GM.

GM5 ADR.OPS.B.010(a)(2) provides practical examples on how to calculate the level of protection required at an aerodrome considering the dimensions of the aircraft using the aerodrome and the number of movements.

GM1 ADR.OPS.B.010(a)(3) that deals with the training of RFF personnel was out of the scope of this NPA. Nevertheless, the Agency takes note of this proposal and, in the future, will assess whether or not is required to upgrade this GM to AMC level.

comment 113

comment by: *Carl Norgren, Swiss Int Air Lines*

We have taken note of NPA 2015-09 and support it without further comments.

response *Accepted*

The Agency appreciates the support of Swiss International Airlines.



2. Explanatory Note		p. 5
comment	38	comment by: ACV TRANSCOM / CSC TRANSCOM <p>How the NSA's and "experts" were designated? Only the industry was also invited and the representatives from the workers side were excluded. Why? The implications of the propositions have or can have important effects on the working conditions of the concerned workers. Furthermore we state that the industry is – like unions – a concerned party which was involved to make proposition and adapt regulation directly applicable on them... In this case or you involve industry and workers or you don't. In this dossier, the workers' representatives/workers organizations and workers were clearly discriminated.</p>
response	<i>Not accepted</i>	<p>The Agency has a detailed procedure on how to determine the composition of the rulemaking groups. The members of those groups are selected based on proposals by our Advisory Bodies, e.g. the Rulemaking Advisory Group (RAG) composed by representatives of the EU Member States, and the Safety Standards Consultative Committee (SSCC) composed by industry stakeholders. The European Transport Workers' Federation (ETF) is a member of the SSCC, and unfortunately, we have not received any nomination from them for this rulemaking task as it was the case many times in the past.</p>

2.1. Overview of the issues to be addressed		p. 5-6
comment	98	comment by: FAA <p>The remission factor is not to reduce the level of the RFF, but if there is an airport receiving a certain category of aircraft (1-10) and they are not receiving enough of that category based on operations, then the airport can use the RFF category for the next lower level based on the aircraft movement.</p>
response	<i>Noted</i>	<p>The Agency is of the opinion that there are two different issues. The first issue is the aerodrome category for RFFS which is determined based on paragraphs 9.2.5 and 9.2.6 of ICAO Annex 14. The second issue is the level of protection which is either equal to the aerodrome category or one level below if the number of movements during the busiest three consecutive months is less than 700. The latter is what we consider as 'remission'. Nevertheless, since the term 'remission' is not an ICAO official term, the Agency will not make use of this term either.</p>



<b>2.2. Objectives</b>	p. 6
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comment	39	comment by: <i>ACV TRANSCOM / CSC TRANSCOM</i>
		What is meant by “promote efficiency in the regulatory process”? Which are the additional objectives concrete?
response	<i>Noted</i>	The objectives of the EASA system are described in the Basic Regulation, where further information is included.
comment	99	comment by: <i>FAA</i>
		Comment: Again, I am not sure you understand the meaning of the remission factor as it is applied. It is not intended to be able to reduce the RFF capabilities; it is used to operate at a reduced category based on movements.
response	<i>Noted</i>	See response to Comment No 98 above.
comment	114	comment by: <i>AOPA Finland</i>
		RFF level of protection should be applied <b>only</b> for all aerodromes serving all-cargo, mail and commercial air transport operations performing passenger transportation.
response	<i>Noted</i>	Commission Regulation (EU) No 139/2014 and its associated AMC and GM are applicable to aerodromes open to public use which serve commercial air transport (CAT) and where operations using instrument approach or departure operations are provided, and: <ul style="list-style-type: none"> <li>— have a paved runway of 800 metres or above; or</li> <li>— exclusively serve helicopters.</li> </ul>

<b>3. Proposed amendments — GM1 ADR.OPS.B.010(a)(1) Rescue and firefighting services</b>	p. 7
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comment	7	comment by: <i>safe-runway.GmbH</i>
		“The scope of the rescue and firefighting services is to <b>save lives</b> in the event of an aircraft accident or incident occurring at, or in the immediate surroundings of, the aerodrome.”
		CONCLUSION



The scope clearly addresses severity reduction, but only related to saving human lives. Saving lives is good, but not complete. The scope does not include the desire to reduce the chances of (further) (severe) injuries. Nor does it address saving aircraft, equipment or property.

e.g. when taken literally, it would be OK when an aircraft with 100 passengers and 6 crew, the RFFS would ONLY save the lives, but would accept that (severe) injuries would occur after the accident or incident. It would also be accepted that a fire after the passengers and crew have been vacated the aircraft, would fully destroy the aircraft, the surrounding buildings and that the environment would be spoiled by toxic fumes, oil and fuel, etc. That cannot be the scope of this document; therefore it should be altered.

Probably it is meant that whenever possible the intention should be to save human lives, prevent further injuries; reduce the chance of further damage to aircraft, equipment, property and also save the lives of life stock carried on board, in this priority.

Related to injuries might, as a background, the Automotive Injury Scale prove to be useful. As a policy one could take that the number of 6's should become 5, the 5's to 4, the 4's to 3, the 3's to 2 and the 2's to 1.

#### RECOMMENDATION

The scope of the rescue and firefighting services is to save lives, reduce injuries and safeguard equipment and property (in this order) in the event of an aircraft accident or incident occurring at, or in the immediate surroundings of, the aerodrome.

-or- even better

The scope of the rescue and firefighting services is to reduce the risk to human lives, injuries, equipment and property (in this order) in the event of an aircraft accident or incident occurring at, or in the immediate surroundings of, the aerodrome.

response *Partially accepted*

The introductory note to Chapter 9.2 — Rescue and firefighting (ICAO Annex 14) states that the principal objective of RFFS is to save lives. The way that this note is transposed into GM excludes any other objective. For this reason, the text is proposed to be changed as follows in order to be in line with ICAO Annex 14:

'The ~~scope of the~~ principal objective of rescue and firefighting services is to save lives in the event of an aircraft accident or incident occurring at, or in the immediate surroundings of, the aerodrome. The ~~operational objective~~ rescue and firefighting service is provided is to create and maintain survivable conditions, to provide egress routes for occupants ,and to initiate the rescue of those occupants unable to make their escape without direct aid.'

comment 15

comment by: AENA

We think that the proposed change is confusing and not clear because it doesn't define what "provisions" have to be included in the Emergency Plan. It would be better to include the



reference of the AMC, GM, etc that have to be included in the Emergency Plan, and not leave it as "relevant". Moreover, the wording is not clear whether "their role" refers to the role played by the RFFS or the "Ambulance / Medical services". We suggest to clarify this point is modifying the wording.

response *Accepted*

Text is revised as follows:

'Ambulance and medical services are out of the scope of rescue and firefighting services as described in ADR.OPS.B.010. The role and responsibilities of ambulance and medical services during an emergency should be included in the Aerodrome Emergency Plan (AEP) according to GM3 ADR.OPS.B.005(a).'

comment

33

comment by: *DGAC France*

DGAC supports the exclusion of ambulance/medical services from the scope of RFF services. Ambulance/medical services shall not be regulated in IR-ADR.

This does not prevent an aerodrome operator from having its own ambulance service on the aerodrome if it so decides, for example in case of unavailability of such services in the area of the aerodrome.

response

*Accepted*

Ambulance and medical services are not under the scope of Regulation (EU) No 139/2014. It is a decision of the aerodrome operator how to arrange the presence of ambulance and/or medical services in case of an accident.

comment

37

comment by: *LHR Airports Limited*

Heathrow Airport welcomes the proposed amendments to RFFS at Aerodromes and feels that the proposals are a positive move for RFFS regulation throughout Europe. Heathrow Airport has no opposition to the proposed amendments.

response

*Accepted*

The Agency appreciates the support of Heathrow Airport.

comment

40

comment by: *ACV TRANSCOM / CSC TRANSCOM*

Why additional tasks aren't included for the airport rescue and firefighting services. For us, they also have the task to is to create and maintain survivable conditions, to provide egress routes for occupants, and to initiate the rescue of those occupants unable to make their escape without direct aid in the event or incident occurring in or on the aerodrome



response	<p>infrastructure and not only in the event of an aircraft incident/accident at or in the immediate surroundings of the aerodrome. This is to flew and not clear enough as definition.</p> <p><i>Not accepted</i></p> <p>Please refer to GM1 ADR.OPS.B.010(a)(1).</p>
comment	<p>48 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No: 7</b></p> <p><b>Paragraph No: GM1 ADR.OPS.B.010(a)(1)</b></p> <p><b>Comment:</b> Additional text is recommended after the word “aid” to align with ICAO Annex 14 paragraph 9.2 General – Introductory Note, as shown below</p> <p><b>Justification:</b> Consistency with ICAO SARP</p> <p><b>Proposed Text:</b> After the word ‘aid’ add:</p> <p><i>“The rescue may require the use of equipment and personnel other than those assessed primarily for rescue and firefighting purposes”</i></p>
response	<p><i>Accepted</i></p> <p>Text has been added as proposed.</p>
comment	<p>77 <span style="float: right;">comment by: Union des Aéroports français - UAF</span></p> <p>No comment from UAF</p>
response	<p><i>Noted</i></p>
comment	<p>78 <span style="float: right;">comment by: HIA - Highlands and Islands Airports Limited</span></p> <p>Accept</p>
response	<p><i>Noted</i></p>

### 3. Proposed amendments — AMC2 ADR.OPS.B.010(a)(2) Rescue and firefighting services

p. 7-9

comment	<p>2 <span style="float: right;">comment by: British Airways Flight Operations</span></p> <p>This material seems to imply that an aerodrome operator could deny an aircraft operator permission to operate if the aerodrome RFFS levels are lower than N - 1 (where N is the aircraft RFFS category). Such modus operandi is inappropriate and contrary to the provisions</p>
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	<p>of ICAO Annex 14 (see earlier comment). It is not for an aerodrome operator to approve or deny operations based solely on RFFS provision.</p>
response	<p><i>Noted</i></p> <p>Please refer to the response to Comment No 1 above, where it is explained, also in line with ICAO Annex 6, how this issue should be coordinated between the aerodrome operator and the air operator.</p> <p>Point (f) does not limit the use of the aerodrome, but it clarifies that an aerodrome operator cannot deny any aircraft when this aircraft is in an emergency situation, or when the pilot-in-command considers that a continuation of the flight may create a more significant hazard. For this reason, Point (f) has been revised (see also response to Comment No 8 below).</p>

comment	<p>8 <span style="float: right;">comment by: <i>safe-runway.GmbH</i></span></p>
	<p>“Exceptionally, the aerodrome operator may accept aeroplanes, whose required category is higher than the level of protection provided by the aerodrome, when declaring an emergency situation or when the pilot-in-command considers that diversion to another aerodrome might adversely affect flight safety. “</p> <p>CONCLUSION</p> <p>“Exceptionally” and “May accept” implies that an aerodrome operator might also not accept, thus <b>refuse</b> an aircraft in an emergency situation. This is the other side of the coin of the chosen wording. The uncertainty if aircraft would be allowed to use an (alternate) aerodrome in emergency situations has considerable effects to flight planning and operation of aircraft. E.g. when an aircraft, carrying 350 passengers would have an uncontrollable cargo fire, the pilot in command might decide that landing at an airport with a short runway and even very limited RFFS might be safer than continue the flight for one hour to the nearest aerodrome. When the PIC is than confronted with an aerodrome operator not accepting this flight and would have to continue, the chances of an inflight catastrophe would be increased. This cannot be the intention of this article.</p> <p>You might be aware that aircraft operators use the words suitable</p> <p>Probably what is intended is that aerodrome operators should not use the “emergency” provision to structurally lower their level of protection. This is fully acceptable.</p> <p>RECOMMENDATION</p> <p><del>Exceptionally, the aerodrome operator may accept aeroplanes, whose required category is higher than the level of protection provided by the aerodrome, when</del> When declaring an emergency situation or when the pilot-in-command considers that diversion to another aerodrome might adversely affect flight safety, the aerodrome operator will accept the aeroplane even when the required category is higher than the level of protection provided by the aerodrome.</p>



response

*Accepted*

The Agency acknowledges the fact that the proposed wording may create different interpretations, therefore, it has been rephrased as follows:

'(f) For emergency landings and occasions when in the pilot's-in-command opinion, a diversion or hold may create a more significant hazard, operation of aeroplanes whose required category is higher than the level of protection provided by the aerodrome should be permitted regardless of the rescue and firefighting level of protection available.'

comment

9

comment by: *Brussels Airport*

How should 'reduced activity' be understood ? Is it possible to provide additional guidance material on this subject. E.g. an aerodrome using 3 runways, when it reduces its activities to the use of 1 runway, is this also considered as 'reduced activity' ?

Proposition to change : AMC2 ADR.OPS.B.010(a)(2)(b) : propose to replace the word 'aerodrome' by 'runway' in the first sentence:

"Notwithstanding (a) the aerodrome operator may during anticipated periods of reduced activity (e.g. ...), reduce the rescue and firefighting level of protection available **at a runway in use**. In this case ...."

Example : a situation of 2 or more (parallel) runways

1 runway is continuously in use for cat 9 passenger traffic.

During night time the other parallel runway is only in use for cargo flights.

Is it necessary to maintain cat 9 also for the parallel runway (cargo flights), or may the level of protection (during that period when only cargo flights are making use of that runway) be reduced accordingly ? In other words, is a reduction in level of protection applicable to the aerodrome as a whole, or can it be considered per runway on its specific usage.

response

*Noted*

The Agency does not provide a definition of the 'reduced activity' because this depends on many variables, for example seasonal flight schedules, curfew hours, etc. The Agency is of the opinion that aerodromes with more than one runway need to conduct a detailed assessment of their requirements for RFFS, e.g. location of fire stations to meet the response times, type of aircraft and type of traffic, etc.

comment

10

comment by: *KLM*

the change from 'normally using' to 'expected to use' is not correct.

any aircraft type may be expected but is not reflecting the actual situation at the aerodrome.

no provision has to be made for what is expected over 10years, unless it is certain that a larger than the normal users will come. Only when such an aircraft arrives actually then the



	<p>RFF category has to be upgraded and then if this type will remain to operate only. for a one time operation a one-time solution may be applied.</p> <p>no indication is specified what expected can be; within one year, or one week. the words are vague and not realistic.</p> <p>Therefore the words 'normally using' shall be retained.</p>
response	<p><i>Accepted</i></p> <p>The words 'normally using' have been retained.</p>
comment	<p>12 <span style="float: right;">comment by: <i>KLM</i></span></p> <p>(e) says unforeseen circumstances are always unplanned events and what is stated here is unclear.</p> <p>explanation is required or the whole part to be skipped.</p> <p>(f) an aircraft with a higher category than the aerodrome category shall always be accepted even without declaring an emergency, it shall not be possible that an aerodrome operator is allowed to refuse an aircraft as this may lead to a more dangerous situation for the aircraft than landing on an aerodrome with less RFFS than the aircraft category.</p> <p>therefore no restriction shall be imposed on aircraft by an aerodrome operator.</p>
response	<p><i>Partially accepted</i></p> <p>On Point (e), GM4 ADR.OPS.B.010(a)(2) provides more explanation. A planned change to the level of protection always requires prior approval by the competent authority (CA). Nevertheless, this could not be the case if, for example, an RFF vehicle breaks down despite of the existence of a maintenance program for these vehicles. This is an unforeseen event that may require a temporary reduction in the level of protection without the need to wait for the approval by the CA.</p> <p>Point (f) has been rephrased as follows:</p> <p>'(f) For emergency landings and occasions when in the pilot's-in-command opinion, a diversion or hold may create a more significant hazard, operation of aeroplanes whose required category is higher than the level of protection provided by the aerodrome should be permitted regardless of the rescue and firefighting level of protection available.'</p>
comment	<p>16 <span style="float: right;">comment by: <i>AENA</i></span></p> <p>According to paragraph 2, the "remission factor" can only be done to "airplanes performing passenger transportation", and paragraph c above, says that in the case of all-cargo aeroplane operations the level of protection can be reduced according to the table 2, independent of the number of movements, but says nothing about the "remission factor".</p>



	<p>How do we have to calculate the level of protection when we have an airport with operations of passenger and all-cargo? For example, an airport with 300 operations of passenger RFF category 7 and 50 operations of all.-cargo RFF category 7 (after applying the reduction), what level of protection should have the airport? , 7 because there are all-cargo operations with that RFF category or 6 because the total operations of RFF category 7 are less than 700 movements? We suggest to clarify this with an example in the NPA proposed.</p>
response	<p><i>Noted</i></p> <p>For aerodromes having mixed type of traffic, the required level of protection shall always be the one for the more demanding type of traffic.</p>
comment	<p>17 <span style="float: right;">comment by: AENA</span></p> <p>How far in advance is necessary to define the period of reduced activity? Do these periods of reduced activity must be approved by the competent authority? On the one hand the level of protection is one of the "terms of the certificate", the amendment, as the ADR.OR.B.040 requires prior approval by the competent authority, but as indicated here these periods may be published by NOTAM, so we might think that it should not be defined well in advance. We request to clarify this point.</p> <p>On the other hand, if what you want is to raise the level of protection sporadically (because an aircraft requires it to operate in your airport and you can do it), is it necessary to be approved previously by the competent authority? Should it be published by NOTAM, AIP ..? We think that the legislation should also reflect the possibility of increasing the level of protection in a timely manner and include the necessary requirements.</p>
response	<p><i>Noted</i></p> <p>The required level of protection is based on the aerodrome RFFS category, considering the dimensions of the longest aeroplane normally using the aerodrome. The level of protection could be one category below if the number of aeroplane movements in the highest category is less than 700 during the three busiest consecutive months. This is the level of protection that in our opinion should be included in the terms of the certificate.</p> <p>The definition of the periods of reduced activity needs to be determined by the aerodrome operator and then, the level of protection should be adjusted accordingly. According to GM1 ADR.OR.B.040(a)(b), changes to the RFFS level of protection should be approved by the CA. The publication of the periods with reduced level of protection should be done through the issuance of notices to airmen (NOTAMs).</p> <p>The current requirements ensure the minimum level of protection. This does not prevent an aerodrome operator to raise the level of protection sporadically. From a safety point of view, a reduction in the level of protection is more critical. Nevertheless, changes should be</p>



approved by the CA and published via NOTAM.

comment 18

comment by: AENA

We consider as reliable data for "planning aircraft movements" the authorized programming data (slots), according to the request made by the airlines. We have this data just before the start of each winter / summer season and respond only for the winter / summer season mentioned. In this way is, in March we will have the planning data for the summer season that begins in March-April and in October we will have the planning data for the winter season that begins in October-November. If that planning implies to upgrade the level of protection we wouldn't have enough time to make it effective before operating the aircraft in that category, because sometimes it involves the acquisition of a vehicle, or the recruitment and training of specialized personnel, or even the approval of the competent authority of the new SEI level of protection, issues that cannot be achieved in such a short timeframe.

Taking into account the above, and considering that since ICAO Annex 6 stipulates that operators must plan their flights based on the level of airport and thus go to airports as much with a level less than its category (except in cases of low blood unforeseen or emergency protection), we consider that this requirement should be rethought in order to upgrade the level of protection when that need is maintained over time (eg because it occurs in two following seasons summer or winter) and not in a single season.

response *Accepted*

The text has been revised as follows:

'(...) should, at least annually, forecast the aeroplane traffic expected to operate at the aerodrome for the next twelve-month period. Upon knowledge of planned changes to traffic volume and structure, additional assessments might be necessary. In doing so, (...)'

comment 20

comment by: AENA

We consider necessary to reword this point in a different manner. As stated above airports can have operations with more category than the level of protection given ("remission factor"), so it makes no sense that this section says that only in exceptional cases (emergency) may occur.

Additionally the UE 139/2015 regulation allows the possibility of operations of airplanes with higher aerodrome reference code letter, with no obligation of providing the level of protection of the airplane mentioned (based on a safety study).

Therefore, we propose to amend the wording in order to reflect that this will happen where the law already allows ("Remission factor higher aerodrome reference code letter,...) and in the exceptional emergencies mentioned in this paragraph.



response	<p><i>Noted</i></p> <p>Point (f) has been rephrased as follows:</p> <p>'(f) For emergency landings and occasions when in the pilot's-in-command opinion, a diversion or hold may create a more significant hazard, operation of aeroplanes whose required rescue and firefighting category is higher than the level of protection provided by the aerodrome should be permitted regardless of the rescue and firefighting level of protection available.'</p>
comment	<p>23 <span style="float: right;">comment by: <i>Flughafen Berlin Brandenburg GmbH</i></span></p> <p>Sections (a)(1) and (a)(2) use the wording "aeroplanes expected to use the aerodrome" while in section (b)(1) uses the wording "aeroplane planned to use the aerodrome".</p> <p>Does this difference in wording also imply a different meaning - e.g. a difference of the aerodrome operator's degree of certainty in relation to the airline's flight intentions to that specific aerodrome?</p>
response	<p><i>Accepted</i></p> <p>The wording in both paragraphs has been changed to 'normally using'.</p>
comment	<p>24 <span style="float: right;">comment by: <i>Flughafen Berlin Brandenburg GmbH</i></span></p> <p>For better cross-referencing this table might be numbered.</p>
response	<p><i>Accepted</i></p>
comment	<p>25 <span style="float: right;">comment by: <i>Flughafen Berlin Brandenburg GmbH</i></span></p> <p>Section (d) requires the aerodrome operator to perform at least semi-annual assessments.</p> <p>While the proposed maximum interval of six months may relate to the changes between winter and summer schedule(s), this specific combination of rather short update intervals and a forecast period might not necessarily generate additional gain of knowledge on the side of the aerodrome operator: The validity of the forecast period's second half might be limited by the chronological sequence of the planning procedures the on the side of the airline community.</p> <p>Hence, the following text might be more suitable:</p> <p>"... The aerodrome operator, in order to assess the rescue and firefighting services level of protection to be provided at the aerodrome is appropriate to the aerodrome rescue and firefighting category, should, at least annually, forecast the aeroplane traffic expected to operate at the aerodrome for the next twelve month period. Upon knowledge of planned changes of traffic volume and structure additional assessments might be necessary. In doing</p>



response	<p>so, the aerodrome operator may..."</p> <p>This wording leans towards evidence triggered assessments while still covering potential traffic changes and subsequent amendments of RFFS requirements during the year.</p> <p><i>Accepted</i></p> <p>The text has been revised as proposed.</p>
comment	<p>26 <span style="float: right;">comment by: <i>Amsterdam Airport Schiphol - AMS/EHAM (and D.A.A)</i></span></p> <p>Our proposal is to do the forecast for aeroplane traffic once a year instead of every 6 months.</p> <p>In our opinion there is no necessity for the majority of airports to do a forecast every 6 months due to the fact that the numbers will not differ a lot from a yearly forecast. 6 months should be optional for those airports who want to.</p>
response	<p><i>Accepted</i></p> <p>The text has been revised as follows:</p> <p>'(...) should, at least annually, forecast the aeroplane traffic expected to operate at the aerodrome for the next twelve-month period. Upon knowledge of planned changes to traffic volume and structure, additional assessments might be necessary. In doing so, (...).'</p>
comment	<p>34 <span style="float: right;">comment by: <i>DGAC France</i></span></p> <p><u>In response to (a)(1)</u></p> <p>The Agency provides a definition of the aerodrome category. The criteria taken into account are aeroplane's length and width, expected to use the aerodrome.</p> <p>We would like the Agency to confirm that each MS has the freedom to introduce an additional criterion related to the number of movements in order to define "expected to use the aerodrome" in a more precise way.</p> <p>Guidance with examples intended to illustrate the issue, in terms of minimum traffic frequency, could be useful.</p> <p><u>In response to (c)</u></p> <p>In accordance with (c), the heading of the right column of Table 2 should be : "Rescue and firefighting services level of protection required for all-cargo aeroplanes".</p> <p>Using the word "category" could be wrongly understood as a possibility to further reduce the level of protection if the number of movements in the highest category is less than 700.</p> <p><u>In response to (f)</u></p>



	<p>DGAC France considers this comment as a fundamental one.</p> <p>An emergency landing decision regardless of level of protection rests in the hands of the pilot and not of the aerodrome operator.</p> <p>(f) contradicts the provision of attachment J of ICAO Annex 6 part 1 concerning emergency operations.</p> <p>Therefore, the provision (f) should be repealed.</p> <p>Furthermore, it has to be noted that even for regular operations, both Annex 14 and Annex 6 allow aircraft operators to use aerodromes whose level of protection is lower than the aircraft category (see in particular Annex 6 Standard 4.1.4 and attachment J).</p>
response	<p><i>Noted</i></p> <p>The Agency initially proposed to delete Point (a)(1). Nevertheless, following some comments, it was decided to retain it because it provides a good definition of the level of protection. Furthermore, the Agency decided to maintain the wording ‘normally using’ instead of ‘expected to operate’ in order to be in line with ICAO Annex 14.</p> <p>Concerning the comment on Point (c), the Agency agrees; hence, the heading of the right column of Table 2 has been replaced with ‘RFFS level of protection required’.</p> <p>As for Point (f), the Agency is of the opinion that it does not limit the use of the aerodrome, but it clarifies that an aerodrome operator cannot deny any aircraft when this aircraft is in an emergency situation, or when the pilot-in-command considers that a continuation of the flight may create a more significant hazard. For this reason, Point (f) has been revised (see also response to Comment No 8).</p>
comment	<p>41 <span style="float: right;">comment by: <i>ACV TRANSCOM / CSC TRANSCOM</i></span></p> <p>Notwithstanding (a), the aerodrome operator may during anticipated periods of reduced activity (e.g. specific periods of the year or day), reduce the rescue and firefighting level of protection available at the aerodrome. This isn’t acceptable because if you should provide as aerodrome a continuous and fully operational fire- and rescue service a permanent and complete team should be available with workers that have trust, team spirit and total confidence in each other to assure their work in crisis situations. This is essential. The explanation “e.g. specific periods of the year or day” makes introduction of split shifts and a “flexible planning” possible f rescue- and fire services. The consequences this can have on the social life of the concerned workers and the consequences on the effective level of the quality and intervention possibilities, for us SAFETY AND SECURITY are at stake, certainly if the aerodrome is in the hands of a private company which objective is to make a profit...</p> <p>We don’t see anywhere that the aerodrome must negotiate this either with the staff representatives. The social aspects and social dialogue that is needed isn’t mentioned anywhere.</p>



	<p>Reclassification from category 10 to 7 isn't safe à to low (should remain 10).</p> <p>Reclassification from category 9 to 7 isn't safe à to low (should remain 9).</p> <p>Reclassification from category 8 to 6 isn't safe à to low (should be 7).</p> <p>And assessment every 6 months on rescue and firefighting services in a sector that everyone acknowledge that isn't predictable and volatile is too long. This should be on weekly bases if reduced periods are defined. The definition of these periods is also essential. On day-based reductions (specific periods of the day) isn't acceptable and unsafe!</p> <p>In case of emergency of course an airplane should have the possibility to land anywhere, even if the category doesn't correspondent. But, to put it like in (f), we make reduced services more easy and flexible. In the same regulation you also make it more easy to use the aerodrome in case of emergency. This isn't logical. In all times deviation airports must be operational. On the other hand, according to aviation rules, the pilot in command is responsible on his/her airplane and her/his decision should be respected. In this matter, the pilot must have all information on the status of the rescue- and fire services level. Rephrasing is needed.</p>
response	<p><i>Not accepted</i></p> <p>The aerodrome RFF category is determined based on the overall length and fuselage width of the aeroplanes normally using the aerodrome. The Agency, following the ICAO standards, accepts that the level of protection is one category below the aerodrome category based on the number of movements.</p> <p>The way in which staff rostering will be implemented at each aerodrome is the responsibility of the aerodrome operator and does not fall under the scope of Regulation (EU) No 139/2014.</p> <p>Concerning the level of protection for all-cargo flights, ICAO lately provided additional GM in Doc 9137, Part 1, considering the fact that these flights do not carry passengers, and that the primary objective of RFFS is to save the lives of the crew which are normally located in the forward part of the aeroplane. The Agency's proposal is in line with the ICAO proposal.</p> <p>A weekly assessment of the traffic levels is not feasible since an upgrade of the level of protection requires additional equipment and staff. The proposal aims to ensure that the aerodrome operators assess the future traffic levels in order to start the preparation for upgrading the level of protection.</p>
comment	<p>49 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No: 7</b></p> <p><b>Paragraph No: AMC2 ADR.OPS.B.010(a)(2)</b></p> <p><b>Comment"</b> UK CAA does not support remission in the context of aircraft being used for the public transportation of passengers.</p>



**Justification:** The UK CAA has adopted this position because it recognises that the level of RFFS at an aerodrome is based on media and equipment related to the dimensions of the aircraft (critical area), whilst the minimum number of RFFS personnel at an aerodrome is based on a critical analysis of firefighting and rescue requirements in a credible worst case scenario (Task and Resource Analysis). Both these concepts are based on detailed, justifiable analysis. It appears illogical to then further reduce the RFFS level of protection on the basis of an arbitrary number of movements of the reference aircraft and which offers no safety benefit. Whilst we acknowledge that EASA has an intention to align, wherever possible, to ICAO SARPS, UK CAA recommends that EASA establishes communication with ICAO to remove remission in the context of aircraft being used for the public transportation of passengers, in the future.

response *Noted*

comment

50

comment by: UK CAA

**Page No:** 7

**Paragraph No:** AMC2 ADR.OPS.B.010(a)(2)

**Comment:** Notwithstanding the UK CAA's previous comment on **AMC2 ADR.OPS.B.010(a)(2)**, it is suggested that EASA should include a definition of remission at the start of this section. If the suggested definition is accepted, the terms 'Remission' and 'Remission Factor' should be used more frequently in appropriate areas of the AMC and GM. as proposed below.

**Justification:** The term 'remission' is currently only used once within the NPA (see NPA page 12 – Example 3). Including a definition, and using the terms 'remission' and 'remission factor' more widely in appropriate areas of the AMC and GM will create consistency of understanding, and eliminate misapplication of RFFS category reduction.

**Proposed Text:** Add the following definition at the start of section **AMC2 ADR.OPS.B.010(a)(2)**:

*“Remission – In the context of RFFS, ‘remission’ is defined as a risk based re-calculation of the minimum scale of RFFS services provided at an aerodrome for a particular aircraft movement, when compared to the minimum scale of RFFS that would normally be required in respect of the same aircraft when being used for passenger transportation. ‘Remission’ can be applied to other aeroplane operations (e.g. all cargo, mail, ferry, training, test and end of life aeroplane operations including those carrying dangerous goods) where the persons on board are limited in number, and/or located in known areas of the aircraft, or to aircraft where the number of movements (take off-or landing) is relatively low. Where ‘Remission’ is applied a ‘Remission Factor’ will determine the degree of reduction in the scale of RFFS and is normally expressed as a number of categories.”*

response *Not accepted*



For RFFS, ICAO uses the terms ‘aerodrome category’ and ‘level of protection’. The aerodrome category is based on the longest aeroplanes normally using the aerodrome and on their fuselage width. On the other hand, the level of protection should be equal to or lower than the aerodrome category. In this case, the remission factor is applied.

In order to avoid creating another term, which is also not used in ICAO Annex 14, it is preferable to delete the term ‘remission’ from the proposed text and explicitly use the terms ‘aerodrome category’ and ‘level of protection’ for RFFS.

comment

51

comment by: UK CAA

**Page No:** 7**Paragraph No:** AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (a)(1)

**Comment:** In the context of passenger transportation, the current text and worked examples make it clear that remission can only be applied against the largest aircraft expected to use the aerodrome (i.e. remission can only be taken advantage of once in this context). However, it is not made clear whether the application of remission to passenger transportation flights, and ‘other’ types of flight, should be considered separately. e.g. a Category 10 passenger flight could operate at a Category 9 aerodrome (depending on number of movements), however the same aerodrome could also accept a Category 10 cargo aircraft by providing Category 7 (as per table 2).

EASA are requested to provide clarification regarding the above.

**Justification:** To provide flexibility for aerodrome operators where there is a mixture of aircraft movement types.

response

*Noted*

The Agency is of the opinion that when an aerodrome receives both passenger flights and all-cargo, mail, etc. flights, the aerodrome operator should determine the required level of protection for each different type of operations, and then determine the most demanding among them as the level of protection of the aerodrome (see also response to Comment No 16 above).

comment

52

comment by: UK CAA

**Page No:** 7-8**Paragraph No:** AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (a)(2)

**Comment:** UK CAA has reviewed the NPA regarding RFFS ‘remission’, and the calculation of RFFS category taking into account the 700 movements (as proposed in AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (a)(2)) We have identified 2 differing interpretations relating to the practical application of this AMC as follows:



**Interpretation 1** The one category reduction can only be applied during the busiest consecutive 3 months that were used to calculate the aerodrome's RFFS category. In practice this would mean that, if the aerodrome's busiest consecutive 3 months are June, July, and August, and within this period they are expecting 690 Cat 7 movements, they can accept these movements whilst providing RFFS Category 6. However, if the Category 7 movements continue after the 3 month period, from the first day of the following month (September) the aerodrome would have to provide Category 7. In summary, this interpretation indicates that remission can only be applied during the busiest consecutive three months.

**Interpretation 2** – The 700 movements in the busiest consecutive 3 months is a method for calculating the aerodrome's RFFS category and the one category reduction can be applied continuously until there is a change to the expected number of aircraft movements in the highest category. In practice this would mean that, if the aerodrome's busiest consecutive 3 months are June, July, and August, and within this period they are expecting 690 Cat 7 movements, they can accept these movements whilst providing RFFS Category 6. If the Category 7 movements continue after the 3 month period (i.e. September onwards), they can continue to accept them whilst providing RFFS Category 6, but the aerodrome should continue to monitor the expected number of movements\* in order to remove remission if they go above 700 in the busiest consecutive three months, or the aerodrome expects movements by larger aircraft (e.g. Category 8). In summary, this interpretation indicates that remission, once calculated (based on the busiest consecutive three months), can be continuously applied throughout the other months of the year or until the number of movements, or size of the largest aircraft, changes.

\* See also UK CAA comments regarding AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (d).

EASA are requested to confirm which is the correct interpretation and that this should then be built in to AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (a) (2).

**Justification:** To ensure clarity and consistency of understanding/application of remission.

response *Noted*

The Agency is of the opinion that Interpretation 2 reflects the ICAO, and consequently, its own intention.

comment 53

comment by: UK CAA

**Page No:** 8

**Paragraph No:** AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (c)

**Comment:** The examples of aircraft movement types do not include 'positioning aircraft'. It is suggested that EASA should add 'positioning flights' in line 2 of the paragraph and provide a definition of 'Ferry' and 'positioning flights'.

**Justification:** To include a type of aircraft flight that frequently generates questions



response	<p>regarding the provision of RFFS.</p> <p><i>Accepted</i></p> <p>Positioning flights have been included in Point (c).</p>
comment	<p>54 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 8</p> <p><b>Paragraph No:</b> AMC2 ADR.OPS.B.010(a)(2) Table 2</p> <p><b>Comment:</b> There appears to be is an inconsistency between the way that remission is applied for passenger transportation flights, and for other flights (e.g. all-cargo, training etc) this is most evident at the lower categories (1 – 5). For example, if an aerodrome has less than 700 Category 5 passenger transportation movements in the busiest consecutive 3 months, it could accept the flight whilst providing RFFS Category 4. If the aircraft were an all-cargo flight (or other), if the guidance in Table 2 were followed, it would have to provide Category 5.</p> <p><b>Justification:</b> To resolve an inconsistency where a greater level of RFFS could be required for aircraft with very low numbers of people onboard.</p>
response	<p><i>Noted</i></p> <p>The Agency acknowledges the fact described above, and will contact ICAO for further clarifications.</p>
comment	<p>55 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 8-9</p> <p><b>Paragraph No:</b> AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (d)</p> <p><b>Comment:</b> It is recommended that the change proposed below is made in order to avoid overburdening an aerodrome, and to allow a decision on how frequently monitoring and forecasting should take place to be based on aerodrome circumstances.</p> <p><b>Justification:</b> <b>It is considered that</b> requiring an aerodrome to monitor and forecast aircraft movements at least every 6 months is unnecessarily burdensome.</p> <p><b>Proposed Text:</b> – Amend sub-paragraph (d) as follows:</p> <p>“The aerodrome operator, in order to assess <b>that</b> the rescue and firefighting services level of protection to be provided at the aerodrome is appropriate to the aerodrome rescue and firefighting category, should, <del>at least once every six months,</del> <b>periodically monitor and</b> forecast the aeroplane traffic expected to operate at the aerodrome. <del>for the next twelve month period.</del> In doing so, the aerodrome operator may use all information available from aeroplane operators as well as statistics of aeroplane movements during the year preceding</p>



	the day of review.”
response	<p><i>Partially accepted</i></p> <p>The Agency is of the opinion that forecasting of aircraft movements every six months will be a burden on the aerodrome operators. Nevertheless, leaving this period open would lead to different approaches, therefore, the Agency proposes to have this exercise once a year. The resulting text is the following:</p> <p>‘(...) should, at least annually, forecast the aeroplane traffic expected to operate at the aerodrome for the next twelve-month period. Upon knowledge of planned changes to traffic volume and structure, additional assessments might be necessary. In doing so, (...)’.</p>
comment	<p>63 <span style="float: right;">comment by: ACI EUROPE</span></p> <p>AMC2 ADR.OPS.B.010 (a) (2)</p> <p>Deleting (1) implies deleting the level protection definition. ACI EUROPE proposes to maintain the paragraph (1) as the definition is not to be found elsewhere in the document.</p> <p>(a) (1)(new) It is preferable to revert to ICAO's "normally using" wording. The wording "expected to use" refers to flight planning and is therefore forward looking, introducing an element of uncertainty from the operator's perspective.</p> <p>(c) To avoid confusion for aerodromes serving two different types of traffic - commercial and cargo - it could be useful to state that that the level of reduction is equally applicable to them. ACI EUROPE proposes to begin the paragraph with: "For all aerodromes the level of protection...".</p> <p>In the same paragraph, ACI EUROPE also proposes to clarify that the reclassification of category also applies to delivery and maintenance flights.</p>
response	<p><i>Accepted</i></p> <p>The Agency agrees with the proposal to maintain Point (1) because it provides a definition of the level of protection.</p> <p>The Agency agrees to delete the wording ‘expected to use’ and revert to ICAO’s wording ‘normally using’.</p> <p>Concerning the comment on Point (c), the Agency considers that for aerodromes receiving both passenger and cargo traffic, the level of protection required should be the more demanding.</p> <p>As for the last comment, the Agency is of the opinion that these types of flights could be regarded as ferry flights.</p>



comment

65

comment by: KLM

**(1) The aerodrome category for rescue and firefighting is determined according to Table 1, based on the longest aeroplanes expected to use the aerodrome and their fuselage width. If, after selecting the category appropriate to the longest...etc etc**

Comment:

- This is contradictory to (2) as there is a requirement for a number of movements being at least 700 in the busiest months. The word " normally" should remain to be used instead of expected. By using the word 'expected', this implies that for a one time operation with the longest aeroplane that will never reach the 700 movement figure, the aerodrome would be required to provide RFF services according to table 1 minus one category for such one time operation. This is not realistic.

For example it is expected that 1x per year a 747 will use the airport, it can not be the requirement to provide RFFS (minus 1) for that aircraft type during the whole year. Therefore the word normally has to remain as is in ICAO.

**(c) The level of protection required for all-cargo, mail, ferry, training, test, and end-of-life aeroplane operations, including those carrying dangerous goods, irrespective of the number of movements, may be reduced in accordance with Table 2 as follows:**

Comment:

The table is showing an increase in RFF level. However, the requirement is about saving lives and therefore the safeguarding of the cockpit for these flights is all that should be required. The realistic category for such aircraft is Category 3.

The table is exaggerating the requirement and has to be skipped and replaced by RFF category 3 for all these aeroplanes.

**(e) Unforeseen circumstances leading to temporary reduction of the level of protection of the aerodrome rescue and firefighting services are considered as unplanned events that lead to unavailability of facilities, equipment and resources.**

Comment:

Unforeseen circumstances are always unplanned. The meaning of this text is unclear and should be rephrased or deleted.

**(f) Exceptionally, the aerodrome operator may accept aeroplanes, whose required category is higher than the level of protection provided by the aerodrome, when declaring an emergency situation or when the pilot-in-command considers that diversion to another aerodrome might adversely affect flight safety.**

Comment:

Contradictory with the 700 movements rule; there has to be always the possibility for an aircraft to operate to an aerodrome with a lower RFFS category. That is the operators responsibility and not for an aerodrome to decide. Therefore an aerodrome should base its



response	<p>RFF services on aircraft types normally using the aerodrome.</p> <p><i>Partially accepted</i></p> <p>The Agency wishes to draw attention to the fact that the aerodrome category should not be confused with the level of protection of RFF. The aerodrome category is based on the longest aeroplane ‘normally using’ the aerodrome whereas the level of protection can be lower than the aerodrome category if the number of movements is taken into consideration. The Agency decided also to revert to the term ‘normally using’ to be in line with ICAO.</p> <p>Concerning the comment on Point (c), Table 2 has been derived from ICAO Doc 9137, Part 1, Fourth Edition, 2014.</p> <p>On Point (e), GM4 ADR.OPS.B.010(a)(2) provides more information.</p> <p>As for Point (f), the Agency is of the opinion that it does not limit the use of the aerodrome, but it clarifies that an aerodrome operator cannot deny any aircraft when this aircraft is in an emergency situation, or when the pilot-in-command considers that a continuation of the flight may create a more significant hazard. For this reason, Point (f) has been revised (see also response to Comment No 8 above).</p>
comment	<p>68 <span style="float: right;">comment by: IACA International Air Carrier Association</span></p> <p>AMC2 ADR.OPS.B.010(a)(2) paragraph (f)</p> <p>Some IACA carriers are of the opinion that the proposed amendment seems to contradict the procedure they are currently using of Fire Category -1 (or -2 in some cases) when planning alternates on the Operational Flight Plan.</p> <p>The amendment seems to suggest that it is only acceptable to use an aerodrome with less than the normal aircraft fire category in emergency situations.</p> <p>If this is the case, then many pilots (and NAAs) may not accept planning alternates with lower than the normal fire category, which IACA believes is not the intent?</p>
response	<p><i>Accepted</i></p> <p>The intention of the Agency is not to regulate aeroplane operations through aerodrome operations. Please refer to the response to comment No 1 above for a detailed explanation.</p> <p>Furthermore, Point (f) has been redrafted as follows:</p> <p>‘(f) For emergency landings and occasions when in the pilot’s-in-command opinion, a diversion or hold may create a more significant hazard, operation of aeroplanes whose required category is higher than the level of protection provided by the aerodrome should be permitted regardless of the rescue and firefighting level of protection available.’</p>



comment

69

comment by: *Union des Aéroports français - UAF*UAF comments

AMC2 ADR.OPS.B.010 (a) (1) et (a) (2)

(a) (1)

La suppression du (1) comme prévu par la modification supprime la définition du niveau de protection. L'UAF propose de maintenir le (1).

(a) (2)

(a) Le terme *Expected to use* à l'avantage de renvoyer à une intention de calcul dans le cadre de la planification des vols, alors que le terme *normaly* est lié à un trafic passé qui peut évoluer. Néanmoins il n'apparaît pas suffisamment clair.

L'UAF propose de remplacer *Expected to use* par *normaly planned to use* et définir le terme *normaly*, qui correspondrait à un trafic dont le nombre serait supérieur à 24 pendant 3 mois consécutifs.

(b) l'emploi du terme *may* au lieu de *shall ensure* est préférable.

Par ailleurs, dans le (1) il a été utilisé le terme *planned to used* au lieu de *expected to used*. Ce premier terme conviendrait mieux à la rédaction du (a).

(c) Pour les aéroports ayant 2 types de trafic différents commercial et cargo il serait souhaitable de préciser que la réduction de niveau ne s'applique que pour les vols tout cargo, courrier, etc..

L'UAF propose de compléter le paragraphe par : ***For all aerodromes the level of protection...***

L'UAF propose également de compléter le paragraphe (c) en y précisant pour les vols de tests, les vols de livraison ou de maintenance. L'UAF propose la rédaction suivante : *test flight should include delivery and maintenance flight*".

(f) L'UAF soutient pleinement cet article.

Courtesy translation

AMC2 ADR.OPS.B.010 (a) (1) and (a) (2)

(a) (1)

Delete (1) imply deleting the level protection definition. L'UAF proposes to maintain the paragraph (1).

(a) (2)

(a) Wording *Expected to use* has the advantage to refer to calculation in a framework of flight planification while *normaly* term is related to a past traffic that can evolve. However it does not appear clear enough. Nevertheless, it seems to be not clear enough.

L'UAF proposes to replace *expected to use* by *normaly planned to used* and define it.



In this case, normally planned to used wording should be applicable for a number of flights more than 24 during 3 consecutive months.

(b) Change *may* instead of *shall ensure* is better. UAF support this change. In the paragph (1) working planned to use is use instead of de expected to use. First wording is preferable to parapraph (a) wording.

(c) For aerodromes having two different types of traffic, both commercial and cargo flights it shall be preferable to specify that the level of reduction is only applicable to all-cargo flights, mail ...

L'UAF proposes to complete the paragraphe by: **For all aerodromes** the level of protection...

(f) UAF fully supports this article.

response *Noted*

The Agency agrees with the proposal to maintain Point (a)(1) because it provides a definition of the level of protection.

On Point (a)(2), the Agency decided to revert to the previous wording 'normally using' in order to remain aligned with ICAO.

On Point (b), the proposal to replace the word 'may' with 'shall' is not supported. The decision whether or not to reduce the level of protection during anticipated periods of reduced activity lies with the aerodrome operator, therefore, the use of word 'may' is more appropriate.

Concerning the level of protection of aerodromes having a mix of traffic, the Agency is of the opinion that the most demanding one should apply.

As for Point (f), the Agency is of the opinion that it clarifies that an aerodrome operator cannot deny any aircraft when this aircraft is in an emergency situation, or when the pilot-in-command considers that a continuation of the flight may create a more significant hazard. For this reason, Point (f) has been revised (see also response to Comment No 8 above).

comment

79

comment by: *HIA - Highlands and Islands Airports Limited*

**AMC2 ADR.OPS.B.010(a)2**

Amendments on page 7 - Accepted.

Amendment on page 8

**AMC2 ADR.OPS.B.010(a)2 (c)** - The level of protection required for all-cargo,mail,ferry,training,test and end of life aeroplane operations, including those carrying dangerous goods, irrespective of the number of movements, may be reduced in accordance with Table 2.

**Disagree** - A risk based training risk assessment/needs analysis is required.



response	<p>All other amendments on page 8 - Accepted.</p> <p>Amendments on page 9 - Accepted.</p> <p><i>Noted</i></p> <p>The comment is not understood. However, the Agency follows ICAO Doc 9137, Part 1.</p>
comment	<p>86 <span style="float: right;">comment by: IATA</span></p> <p><b>General IATA comment 1:</b></p> <p>The published EASA NPA GM and AMC material on RFFS implies that, in the case where the largest aeroplane using an aerodrome does not have more than 700 movements in the busiest 3 months of a year, the maximum remission of RFFS level to be applied by the Airport Operator is N – 1 (N is the aeroplane RFFS category). This is a requirement from the Airport Operator.</p> <p>However, ICAO Annex 14 (Standards and Recommended Practices) last sentence of the Introductory Note reads: <i>“It is not intended that these SARPS limit or regulate the operations of an aircraft”</i>.</p> <p>The GM and AMC material implies that an Airport Operator could refuse permission for an aircraft operator to take-off or land if an (<u>alternate</u>) aerodrome RFFS level is less than N-1, but such an approach is not in alignment with the ICAO Annex 14 note. The aircraft operator is responsible for ensuring satisfactory RFFS levels are available for the route planned.</p> <p>EASA is requested to copy the Annex 14 introductory sentence in the GM and AMC material to clarify the responsibility of the aircraft operator which is governed by ICAO Annex 6 and in this way clearly will balance the responsibility of the airport operator with the responsibility of the aircraft operator.</p>
response	<p><i>Accepted</i></p> <p>Please refer to the response to Comment No 1 for a detailed explanation. Furthermore, for emergency situations, Point (f) has been redrafted as follows:</p> <p>‘(f) For emergency landings and occasions when in the pilot’s-in-command opinion, a diversion or hold may create a more significant hazard, operation of aeroplanes whose required category is higher than the level of protection provided by the aerodrome should be permitted regardless of the rescue and firefighting level of protection available.’</p>
comment	<p>87 <span style="float: right;">comment by: ISAVIA ohf.</span></p> <p>This comment is for item f), which in the opinion of Isavia breaks the fundamental principle of aerodrome regulation which is to regulate aerodromes but not other domains such as air operations in this case, as air operations is and should be solemnly regulated in the air</p>



operations regulations. Aerodromes furthermore do not accept aeroplanes for landing although they may accept/make an agreement for certain operations or intentions for certain operations. Therefore Isavia recommends the following change in the text:

f) ~~These provisions do not exclude~~ ~~Exceptionally, the aerodrome operator may accept movements of aeroplanes, whose required category is higher than the level of protection provided by the aerodrome, when the pilot-in-command has considered appropriate regulation for the flight operation when declaring an,~~ ~~or when the pilot-in-command considers that diversion to another aerodrome might adversely affect flight safety, or when emergency situation requires the use of the aerodrome.~~ ~~or when the pilot-in-command considers that diversion to another aerodrome might adversely affect flight safety.~~

response *Partially accepted*

The intention of the Agency is not to regulate aeroplane operations through aerodrome operations. Please refer to the response to comment No 1 for a detailed explanation.

Furthermore, Point (f) has been redrafted as follows:

'(f) For emergency landings and occasions when in the pilot's-in-command opinion, a diversion or hold may create a more significant hazard, operation of aeroplanes whose required category is higher than the level of protection provided by the aerodrome should be permitted regardless of the rescue and firefighting level of protection available.'

comment 90

comment by: IATA

**AMC2 ADR.OPS.B.010(a)(2) Rescue and firefighting services**

**RFFS LEVEL OF PROTECTION para (c):**

**IATA Comment 2:**

RFFS is meant in the first place for rescue of lives (persons) and in the second place the rescue of the aircraft. For concerned aircraft (all-cargo, mail etc.) the number of persons on board is in most of the aircraft operations not exceeding the members of the cockpit.

Therefore IATA finds it difficult to understand the rationale why such a high RFFS Cat of 7 (delivering 18.200 l; 2 RFFS vehicles, which is normally coping with approx. 180 pax, A320 type of aircraft) to cover a RFFS Cat 10 aircraft which is used as cargo or ferry aircraft.

It would make more sense to require minimal RFFS Cat 4 (ATR type of aircraft – approx. 70 pax) for such aircraft which counts on maximum 3.600 l of water and 1 RFFS vehicle and which is deemed sufficient to save the lives of the cockpit crew.

response *Not accepted*

The RFF category of each aircraft is based on two parameters, firstly the overall length of the aircraft and secondly the fuselage width. For cargo aircraft, the category is primarily based



on the fuselage width, and considering that the main objective is to save the flight crew seated in the forward part of the aircraft, a reduction in the level of protection is allowed.

comment

91

comment by: IATA

**On Page 9: AMC2 ADR.OPS.B.010(a)(2) Rescue and firefighting services  
para (e)**

**IATA Comment 3:**

Add after “resources” .... “and must be promulgated by NOTAM”.

response

Noted

The issue is already addressed in AMC1 ADR.OPS.A.005(a)(11) and in GM1 ADR.OPS.A.005.

comment

92

comment by: IATA

**On Page 9 AMC2 ADR.OPS.B.010(a)(2) Rescue and firefighting services**

**RFFS LEVEL OF PROTECTION para (f)**

**IATA Comment 4:**

This paragraph allows the aerodrome operator to accept aircraft with a higher RFFS category than the level of protection provided by the aerodrome when declaring an emergency or when the PiC considers that diversion to another aerodrome might adversely affect flight safety.

Par(f) seems not aligned with time periods of reduced aircraft operations at an aerodrome. During such periods the aerodrome operator may decide to lower the RFFS Cat of the aerodrome.

An aircraft with a higher RFSS Cat which is in distress during such time periods has to declare an emergency or can be refused to land according to par(f). Such situations must be avoided.

At the same time this could lead to a conflict of interest between the airport operator and the airline/pilot at the moment when the request for diversion is made. In fact, ad hoc negotiations via R/T in such distress situations must be avoided at all times and the aerodrome needs to be clear about this in the AIP.

IATA would recommend to provide additional guidance for Aerodrome Operators and to delete “when declaring an emergency” and extend the phrase: i.e.: .... “the aerodrome operator may accept aeroplanes with a higher RFFS category than the level of protection provided by the aerodrome ~~when declaring an emergency or~~ when the PiC considers that diversion to another aerodrome might adversely affect flight safety” with the text “which information must be promulgated in the AIP”



response

*Noted*

On Point (f), the Agency is of the opinion that it clarifies that an aerodrome operator cannot deny any aircraft when this aircraft is in an emergency situation, or when the pilot-in-command considers that a continuation of the flight may create a more significant hazard. For this reason, Point (f) has been revised (see also response to Comment No 8 above).

comment

96

comment by: *Belgian CAA*

We don't believe the following text should be taken up in the ADR regulation : "exceptionally, the aerodrome operator may accept aircraft, whose required level of protection for rescue and firefighting is higher than the level provided by the aerodrome, when declaring an emergency situation or when the pilot-in-command considers that diversion to another aerodrome might adversely affect flight safety".

This is more an OPS rule (pilot's discretion in case of emergency or whether diversion to another aerodrome might adversely affect flight safety), and doesn't belong in the ADR rules. Moreover, by putting such "OPS rule" in ADR regulation, there is a risk of non consistency with OPS regulation.

response

*Accepted*

On point (f), the Agency is of the opinion that it clarifies that an aerodrome operator cannot deny any aircraft when this aircraft is in an emergency situation, or when the pilot-in-command considers that a continuation of the flight may create a more significant hazard. For this reason, Point (f) has been revised (see also response to Comment No 8 above).

comment

97

comment by: *ISAVIA ohf.*

Isavia is of the opinion that the text in Chapter **AMC2 ADR.OPS.B.010(a)(2) Rescue and firefighting services, paragraph 2 (d)** is too burdensome for the aerodrome operator and suggests the following changes to the paragraph:

The aerodrome operator, in order to assess if the rescue and firefighting services level of protection to be provided at the aerodrome is appropriate to the required aerodrome rescue and firefighting category, should, monitor changes in airtraffic which may affect the rescue and firefighting category at the aerodrome. ~~at least once every six months, forecast the aeroplane traffic expected to operate at the aerodrome for the next twelve month period.~~ In doing so, the aerodrome operator may use all information available from aeroplane aircraft operators as well as statistics of aeroplane aircraft movements during the year preceding the day of review.

response

*Partially accepted*

The Agency is of the opinion that forecasting of aircraft movements every six months will be



a burden on the aerodrome operators. Nevertheless, leaving this period open would lead to different approaches, therefore, the Agency proposes to have this exercise once a year. The resulting text is the following:

'(...) should, at least annually, forecast the aeroplane traffic expected to operate at the aerodrome for the next twelve-month period. Upon knowledge of planned changes to traffic volume and structure, additional assessments might be necessary. In doing so, (...)'

comment	100	comment by: FAA
	This paragraph is the remission factor as it is intended for use.	
response	<i>Noted</i>	

comment	103	comment by: TRANSPORT AUTHORITY, Slovak republic
	AMC2ADR.OPS.B.010(a)(2) Rescue and firefighting services	
	(c)	
	We would suggest to add definitions of all-cargo, mail and end-of-life aeroplane operations as this terms are not specified in reg. 216/2008, 139/2014. With no definition there could be some misunderstandings	
	for us all-cargo means: no passengers only cargo on board	
	mail: only mail and cargo on board no passengers	
	end-of life aeroplane operations: please specify what are the specifications for this type of operation	
	(d)	
	From our point of view based on knowledge of amount of traffic at some Slovakian airports making forecasts every six months for the next twelve month period will not be possible (or will not provide any effect) because most of the aerodrome are dependent only on charter flights not regular one. In this case it can be problematic to forecast anything.	
response	<i>Partially accepted</i>	
	The Agency will consider in the future the necessity of adding definitions of these types of flight. Point (c) refers to those type of flights that do not carry passengers.	
	Concerning Point (d), the Agency is of the opinion that forecasting of aircraft movements every six months will be a burden on the aerodrome operators. Nevertheless, leaving this period open would lead to different approaches, therefore, the Agency proposes to have this exercise once a year. The resulting text is the following:	
	'(...) should, at least annually, forecast the aeroplane traffic expected to operate at the	



aerodrome for the next twelve-month period. Upon knowledge of planned changes to traffic volume and structure, additional assessments might be necessary. In doing so, (...)’.

comment

108

comment by: *Flughafenverband ADV*

(a)

(1) und (2)

Die ADV merkt an, dass die Änderung von „normally use“ zu „expected to use“ die Wahrscheinlichkeit erhöht, dass ein erwartetes Luftfahrzeuge einer höheren Brandschutzkategorie in die Festlegung der Brandschutzkategorie mit eingerechnet werden müsste. Es wirft die Frage auf: Was ist mit erwartet gemeint?

Nicht alle Luftfahrzeuge, die im Rahmen einer z.B. saisonalen Flugplanung angekündigt und koordiniert sind, fliegen tatsächlich einen Flughafen an. Die Absichten, Zusagen und Pläne der Luftverkehrsgesellschaften gegenüber Flughäfen ändern sich häufig bis zum eigentlichen Ereignistag. Flüge und/oder Streckenkontingente werden annulliert, falls eindeutig ist, dass diese nicht rentabel operieren.

Auf reine Absichtserklärungen und Planangaben der Airlines die 700 Bewegungen für mögliche „higher categorie aeroplanes“ hochzurechnen, könnte zu massiven Mehrkosten und zu einem zusätzlichen Planungsaufwand führen, ohne dass dadurch in irgend einer Form sichergestellt ist, dass dies wirklich benötigt wird oder gar ein Zusatz an Sicherheit erzielt wird.

Extreme Mehrkosten können z.B. für kleinere und mittelgroße Flughäfen entstehen, für deren Standardverkehr niedrigere protection levels (7, 8) ausreichend sind, jedoch aufgrund punktueller Sondersituationen Luftfahrzeuge der ICAO- Luftfahrzeugklasse E im Gelegenheits- und Ausweichverkehr verkehren können. Ein Beispiel sind große Hubflughäfen, die auf Grund Schlechtwetters geschlossen werden. In Folge müssen aus Sicht der ADV bei der Flughafenfeuerwehr entsprechend mehr Personal, Geräte, Fahrzeuge und Löschmittel, für einen Zustand, der keinen Mehrwehrt an Sicherheit bietet, vorgehalten werden.

Die heute geltende Formulierung ist dagegen viel eindeutiger.

Die Forderung der ADV lautet somit: Die bisherige Formulierung muss beibehalten werden.

(c)

The level of protection required for all-cargo, mail, ferry, training, test, and end-of-life aeroplane operations, including those carrying dangerous goods, irrespective of the number of movements, may be reduced in accordance with Table 2 as follows:

Aerodrome category	Reclassification of aerodrome category required for all-cargo and mail aeroplanes
1	1
2	2



3	3
4	4
5	5
6	5
7	6
8	6
9	7
10	7

Die im einleitenden Satz genannten Flüge "all-cargo, mail, ferry, training, test, and end-of-life aeroplane operations" müssen auch konsequent in der Tabelle wieder aufgeführt werden, um die bereits formulierte Absicht in der Tabelle nicht wieder auf „Cargo und mail“ einzuschränken.

response *Accepted*

The Agency decided to use the wording 'normally using' instead of 'expected to use'.  
Table 2 refers to these type of flights under Paragraph (c).

comment *109*

comment by: *Flughafenverband ADV*

(d) (e) (f)

Eine Vorausplanung des Flughafenbetriebes über 12 Monate ist aufgrund der saisonalen Planungsintervalle (Sommer-/Winterflugplan) und der dadurch sehr variablen Verkehrsentwicklungen generell für die bedarfsgerechte Planung von infrastrukturellen Ressourcen aus Sicht der ADV nicht aussagekräftig. Eine Abschätzung über Art und Häufigkeit von Flugzeugmustern zu treffen, wird von der ADV als sehr kritisch angesehen.

Die Ausrichtung der Größe und Leistungsfähigkeit einer Flughafenfeuerwehr kann nicht alle sechs Monate geändert bzw. angepasst werden. Notwendige personelle Maßnahmen unter der Vorgabe der Ausbildungsvorschriften von Feuerwehrpersonal und Ausrüstungen für kurzfristige Aufstockungen sind in dieser Sequenz sind nach Meinung der ADV nicht darstellbar. Die Beschaffung von Gerät und ausgebildetem Personal ist ohne Vorlauf nicht möglich. Ebenfalls bedarf es einer (Ausnahme-) Regelung für den Fall von einmaligen Flugaufkommen, über 700 Bewegungen. Eine Investition in Personal und Gerät muss nachhaltig wirtschaftlich sein.

Auch die jeweilige Erstellung der damit verbundenen und notwendigen



Änderungen/Anpassungen der behördlichen Auflagen und Genehmigungen durch die Aufsichtsbehörde sind in diesen Intervallen schwer vorstellbar. Das „Level of Protection“ ist aus Sicht der ADV als Teil der infrastrukturellen Einrichtung eines Flughafens zu sehen. Ein Flughafen und dessen Aufsichtsbehörde entscheiden sich bewusst für eine Brandschutzkategorie, basierend auf dem regulären (nicht saisonal geplanten!) Flugbetrieb und den entsprechenden Luftfahrzeugkategorien. Analog anderer Infrastruktureinrichtungen ist diese auf eine bestimmte Kategorie an Luftfahrzeugtypen ausgelegt

Das erwähnte Vorgehen würde bedeuten, dass bereits bei Planungen oder Anfragen von Luftverkehrsgesellschaften für Bewegungen mit Luftfahrzeugen eines höheren „ICAO Code Letter“ die Feuerwehrkategorie erhöht werden muss. Die Infrastruktur sollte sich also nach den Vorstellungen der EASA dem Bedarf saisonal anpassen. Dies macht im Bereich der Flughafenfeuerwehr keinen Sinn, insbesondere wenn man saisonale Flugplanänderungen in Betracht zieht. Als Beispiel führt die ADV an, dass ein Flughafen, der im Winterflugplan mehr Flugbewegungen mit Luftfahrzeugen einer höheren Kategorie hat, in der Sommerflugplanperiode Personal und Geräte reduzieren soll. Diese muss der Flughafen im Winter wieder einstellen bzw. aktivieren. Nach Feststellung der Kategorieerhöhung ist ein Umsetzungszeitraum notwendig.

Es wirft die Frage auf, wie in diesem Fall die Vorgaben der EASA zu Ausbildung und Recurrent Trainings eingehalten werden können?

Es besteht zudem die Gefahr der Herabstufung hochqualifizierter Feuerwehrleute zu Saisonarbeitern

Der Beruf eines Feuerwehrmannes an einem Flughafen verliert dadurch an hoher Attraktivität. Diese Entscheidung, die weitaus mehr Faktoren berücksichtigt, als die geplanten Luftfahrzeugtypen, muss weiterhin von den verantwortlichen Personen des Flughafenbetreibers in Abstimmung mit der Aufsichtsbehörde getroffen werden, nachhaltig ausgelegt sein. Sie soll nicht an von Luftverkehrsgesellschaften geplante Bewegungen gekettet werden.

Die ICAO hat weltweit bindende und seit Jahren bewährte Vorgaben zur Berechnung und Auslegung der Brandschutzkategorie und damit der Größe und Auslegung einer Flughafenfeuerwehr in Kraft.

Die durch die EASA geforderte, saisonale Anpassung der Flughafenfeuerwehr würde dazu beitragen, den Aufwand und die Kosten in Planung und Betrieb zu erhöhen. Gefestigte und sichere Strukturen werden dadurch aufgeweicht. Dies würde ein Risiko für die Betriebssicherheit darstellen. Der Nutzen wäre gering. Das bisherige Verfahren erzielt hier einen größeren Nutzen. Dabei handelt es sich um die Bewertung der Kategorie durch den Flughafenbetreiber aufgrund der Ausrichtung des Flughafens und eventuell konkreter Flugpläne und Entwicklungskonzepte der Luftverkehrsgesellschaften und Genehmigung dieser durch die Aufsichtsbehörde).

Die Bedingungen im Rahmen der Sicherheit und der EU-VO 139/2014 werden mit den bisherigen Vorgaben bereits umgesetzt.

Die ADV ist der Meinung, dass die weiteren Vorgaben dieses NPAs primär nichts mit dem



„Rescue and Firefighting Service“ eines Flughafens zu tun haben, da die Schutzkategorie ohnehin mit bereits existierenden Vorgaben der EASA Reglementierung genau definiert ist. Das gilt auch für die Bedingungen im Zuge der 700 Bewegungen größerer Luftfahrzeugtypen. An dieser Stelle wird kein höherer Sicherheitslevel durch die Art und Weise oder den Zeitraum, in dem ein Flughafen diese Analysen durchführen muss, generiert. Jeder Flughafen ist betrieblich unterschiedlich ausgerichtet, betreibt eine größtenteils gewachsene und mit anderen Flughäfen nicht vergleichbare Infrastruktur. Außerdem werden neben den expliziten Vorgaben die unterschiedlichen Faktoren in der Ausrichtung des Lösch- und Rettungswesens berücksichtigt. Die ADV fordert, dass das auch weiterhin so bleiben können sollte.

response *Noted*

The proposed Point (d) makes sure that the aerodrome operator monitors the aeroplane movements at the aerodrome in order to ensure that the level of protection provided corresponds to the traffic levels and the aerodrome category for RFFS. This is only a part of the process that is followed by additional assessments in order to decide whether an upgrade of the aerodrome category is really required. The Agency acknowledges the fact that an upgrade requires time and resources, which is not easily achievable in a very short period of time.

The text has been revised as follows:

‘(...) should, at least annually, forecast the aeroplane traffic expected to operate at the aerodrome for the next twelve-month period. Upon knowledge of planned changes to traffic volume and structure, additional assessments might be necessary. In doing so, (...)’.

### 3. Proposed amendments — AMC3 ADR.OPS.B.010(a)(2) Rescue and firefighting services

p. 9

comment 11

comment by: *Brussels Airport*

We believe that some extra information is required on the proposed amended text of AMC3 ADR.OPS.B.010(a)(2) (a)(1).

The original text is pretty clear. For instance for a category 9 aerodrome, the minimum required number of rescue & fire fighting vehicles is 3.

Where it states (in the amended text) that the reason for the minimum number of RFF vehicles is to effectively deliver and deploy the agents specified for the aerodrome category, this gives room for (different) interpretations.

We’d like to illustrate this with an example.

Let’s consider a cat 9 aerodrome.

According to table 1 of AMC3 ADR.OPS.B.010(a)(2) it requires 3 RFF vehicles.

If with 2 vehicles of 12.500l) it is possible to deliver & deploy effectively 24300 l at a discharge rate of at least 9000 l/min, what is then the use of having a 3<sup>rd</sup> vehicle, unless of



course each fire should be attacked from 3 different suppressing sources simultaneously ?

So, looking at the example of 2 vehicles, could that be considered as an equal level of safety on the subject of delivering and deploying effectively, compared to the requirement of 3 vehicles to reach the same deploying & delivering rate ?

Since in ICAO Annex 14 § 9.2.41 it is not a standard but a recommendation to have 3 RFF vehicles for a category 9 aerodrome in the above mentioned example, 2 vehicles is sufficient and compliant.

Suggest to change the text AMC3 ADR.OPS.B.010(a)(2) (a) as follows : “ the minimum number of RFF vehicles at the aerodrome will be in accordance with the following table; [table]. The minimum number of RFF vehicles responding to an incident **in relation to a runway** should be sufficient to effectively deliver and deploy the agents specified for the aerodrome category.”

Questions : Within 3 minutes we are able to deliver at least 50 % with the 1<sup>st</sup> vehicle and within 1 minute later the other 50%, with the 2<sup>nd</sup> vehicle. Question 1 : In case the solution with 2 vehicles is not acceptable, is it acceptable to have the 3<sup>rd</sup> vehicle on stand-by at the fire station, or is the 3<sup>rd</sup> vehicle required to proceed to the incident site as well. Question 2 : in case this 3<sup>rd</sup> vehicle is required to join the intervention site as well, does that vehicle have to arrive as well within the 1 minute following the 3 minutes.

response *Not accepted*

Table 1 specifies the minimum number of RFF vehicles, in line with ICAO. The purpose of this addition is to ensure that other vehicles, such as the incident commander’s vehicles, are not included in this number.

This Table provided by the Agency is one way to comply with the requirements of the related Regulation. Alternative means of compliance may be used provided that they achieve an equivalent level of safety and are accepted by the CA.

comment 42

comment by: ACV TRANSCOM / CSC TRANSCOM

The minimum number of rescue and firefighting vehicles are known, but on the European level negotiations are needed in the social dialogue committee how many agents (extinguishing and rescue) are minimum required for each category. In the meantime, these minima must be negotiated with the staff representatives on national level. Every month a report of the aerodrome safety committees should be brought on the well-being committees of the staff representatives at the aerodrome. The current ‘staff numbers definition’ isn’t enough.

response *Not accepted*

The minimum amount of extinguishing agents and vehicles is proposed by the Agency in the related AMC whereas the staffing levels are calculated based on a ‘Task and Resource



Analysis' conducted by the aerodrome operator.

comment	70	comment by: <i>Union des Aéroports français - UAF</i>
	No comment from UAF	
response	<i>Noted</i>	

comment	80	comment by: <i>HIA - Highlands and Islands Airports Limited</i>
	Agree	
response	<i>Noted</i>	

comment	111	comment by: <i>Flughafenverband ADV</i>
	<p>Es sollte nach Meinung der ADV die Aussage zu der nun in der Tabelle vorgegebenen Anzahl an Löschfahrzeugen (FLF) geklärt werden.</p> <p>Es stellt sich die Frage, ob man gemäß der neuen Vorgabe künftig 4 Löschfahrzeuge benötigt, um ein defektes ersetzten zu können, um den vorgegebenen Einsatz von 3 Löschfahrzeugen immer gewährleisten zu können. Oder ist das neue, 3. FLF bereits als Redundanz zu sehen?</p> <p>Sofern die Vorgabe darauf abzielt, 3 FLF an der Schadenstelle einzusetzen: warum muss man 3 Fahrzeuge einsetzen, wenn die Einhaltung der vorgegebenen Zeit und der Ausbringrate von Löschmittel technisch auch mit 2 Fahrzeugen möglich ist. Ein Vorteil dieser Vorgabenänderung ist nicht nachvollziehbar.</p> <p>Oder kann die Vorgabe dahingehend ausgelegt werden, dass es ausreichend ist, weiterhin ein Ersatzlöschfahrzeug am Flughafen vorzuhalten? Sollte dies der Fall sein, könnte dann unter Bezug auf die Vorgabe „Contingency“ in GM4 ADR.OPS.B.010(a)(2) darauf verzichtet werden?</p> <p>Bei Neueinführung von Vorgaben, sollte eine genaue Erläuterung des Inhaltes stattfinden.</p>	
response	<i>Noted</i>	

### 3. Proposed amendments — AMC4 ADR.OPS.B.010(a)(2) Rescue and firefighting services

p. 9-10

comment	6	comment by: <i>Aéroports de Lyon</i>
	<p>Article (oa): recalculation of quantities of extinguishing agents</p> <p>As recommended in page 18, recalculation of quantities of extinguishing agents should be based on ICAO Doc 9137.</p> <p>Will EASA provide a table similar to Table 2-4 in ICAO Doc 9137 with maximum quantities of</p>	



	<p>extinguishing agents based on largest dimensions of an aeroplane for all types of foam level (particularly for foam meeting performance level B)?</p>
response	<p><i>Noted</i></p> <p>Table 1 in the related AMC provides the minimum useable amounts of extinguishing agents based on the average overall length of the aeroplane in a given category. Furthermore, GM6 ADR.OPS.B.010(a)(2) provides a method for calculating the required water quantities, using the ICAO critical-area concept. For these reasons, the Agency considers that the information provided is adequate to support the aerodrome operators in calculating the required quantities.</p>
comment	<p>13 <span style="float: right;">comment by: <i>KLM</i></span></p> <p>(ob) for cargo/mail etc aircraft it will mean that category 7 will be applicable, which is way too much. considering only that the cockpit is occupied with thwese aircraft a category of 3 or 4 would be sufficient. only the cockpit area can be covered with one fire fighting vehicle only.</p>
response	<p><i>Not accepted</i></p> <p>The RFF category for each aircraft is based on two parameters, firstly the overall length of the aircraft and secondly the fuselage width. For cargo aircraft, considering the fact that the primary objective is to save the flight crew located in the front part of the aircraft, the decisive factor is not the fuselage length but the fuselage width. Nevertheless, the calculation allows, due to decreased fuselage length, a reduction in the level of protection required (therefore, an RFFS Category 7 is allowed for a Category 10 cargo aircraft).</p>
comment	<p>32 <span style="float: right;">comment by: <i>DGAC France</i></span></p> <p>The Agency should introduce the definition and/or technical characteristics of the performance levels A, B and C foams in the regulation (as included in ICAO doc 9137, fourth edition, Part 1, Chapter 8).</p> <p><u>In response to (da)</u></p> <p>(da) has been added from standard OACI 9.2.14 (Annex 14) whose wording is unsatisfactory.</p> <p>DGAC proposes a new wording :</p> <p>(da) The quantity of foam concentrates separately provided on vehicles for foam production is in proportion to the quantity of water provided, depending on the characteristics of the foam concentrate selected.</p>
response	<p><i>Partially accepted</i></p>



Point (da) has been revised as follows:

‘(da) the quantity of foam concentrates separately provided on vehicles for foam production is in proportion to the quantity of water provided and the foam concentrate selected;’

comment	43	comment by: ACV TRANSCOM / CSC TRANSCOM
	<p>The minimum number of rescue and firefighting vehicles are known, but on the European level negotiations are needed in the social dialogue committee how many agents (extinguishing and rescue) are minimum required for each category. In the meantime, these minima must be negotiated with the staff representatives on national level. Every month a report of the aerodrome safety committees should be brought on the well-being committees of the staff representatives at the aerodrome. The current ‘staff numbers definition’ isn’t enough.</p>	
response	<i>Not accepted</i>	
	<p>The minimum amount of extinguishing agents accepted by the Agency is included in AMC4 ADR.OPS.B.010(a)(2), and the staffing levels are calculated based on a ‘Task and Resource Analysis’ conducted by the aerodrome operator.</p>	
comment	56	comment by: UK CAA
	<p><b>Page No:</b> 10</p> <p><b>Paragraph No:</b> AMC4 ADR.OPS.B.010(a)(2) sub-paragraphs (oa) and (ob)</p> <p><b>Comment:</b> It is recommended that the word ‘computed’ is removed.</p> <p><b>Justification:</b> To avoid introducing a new word (and therefore confusion) that has not been used elsewhere and is not considered necessary.</p>	
response	<i>Accepted</i>	
	<p>The word ‘computed’ has been deleted.</p>	
comment	57	comment by: UK CAA
	<p><b>Page No:</b> 10</p> <p><b>Paragraph No:</b> AMC4 ADR.OPS.B.010(a)(2) sub-paragraph (ob)</p> <p><b>Comment:</b> It is recommended that sub-paragraph (ob) is amended to include examples of ‘other aircraft flight types’ that feature in paragraph AMC2 ADR.OPS.B.010(a)(2) paragraph (c)</p> <p><b>Justification:</b> To improve the consistency of information contained in the text.</p>	



response

*Accepted*

The text has been revised.

comment

71

comment by: *Union des Aéroports français - UAF*

No comment from UAF

response

*Noted*

comment

81

comment by: *HIA - Highlands and Islands Airports Limited*

Agree

response

*Noted*

comment

101

comment by: *FAA*

This does not tell me how much water or foam concentrate is actually needed. This needs to be in the document because there are other factors which you need the information for.

response

*Noted*

The Agency does not provide figures for every case. Instead, GM6 ADR.OPS.B.010(a)(2) provides a method for calculating the required water quantities.

comment

104

comment by: *TRANSPORT AUTHORITY, Slovak republic*

AMC 4 ADR.OPS.B.010(a)(2) Rescue and firefighting services

(da)

During audits we have experienced that some RFF vehicles are able to carry more water than is required based on Table 1 or based on critical area calculation but it is able to carry foam concentrate only for needed amount of water based on Table 1 or based on critical area calculation. So when the foam concentrate tank is empty, there is still some hundreds of liters of water left.

Example (figures are not based on real operation data, they were just set for the purpose of the example):

Let's suppose that requirements for aerodrome RFF category are as follows:

Water 15 000 L

Foam concentrate 1 000 L



	<p>Vehicle parameters:</p> <p>Water 20 000 L</p> <p>Foam concentrate 1 000 L</p> <p>Conclusion: foam concentrate requirements are met (the requirement AMC4 ADR.OPS.B.010(a)(2)(e) - two loads of foam solution is met as well), but amount of water in vehicle is higher than needed for foam production by 5 000 L in this example.</p> <p>Is it non compliance or not? If it is not acceptable, our aerodrome operator suggested not to fill the water tank to its maximum volume. But from our point of view this suggestion is really not "safety friendly".</p>
response	<p><i>Noted</i></p> <p>The Agency, similarly to ICAO, proposes the minimum quantities of water and foam concentrate.</p>
comment	<p><i>110</i> <span style="float: right;">comment by: <i>Flughafenverband ADV</i></span></p> <p>(oa) und (ab)</p> <p>Unterhalb der Schwelle von 700 Flugbewegungen in den drei verkehrstärksten Monaten war bisher kein Sonderverfahren definiert. Die Vorgabe, dass die RFF-Kategorie maximal eine Kategorie darunter liegen durfte, war bereits in den Vorgaben der ICAO maßgeblich. Dass jedoch, sollte ein Luftfahrzeugtyp, welcher unter die „700-Bewegungsregel“ fällt, auch nur einen Flug durchführen, in Folge dessen die darunterliegende Kategorie dann auf das größte Luftfahrzeug dieser Kategorie bemessen werden sollte, ist neu und aus Safety-Sicht nicht nachvollziehbar.</p> <p>Die heutige Praxis ist die, dass bei über 700 Bewegungen (innerhalb der drei verkehrstärksten Monate) von „Higher Code Letter Aircraft“ die Brandschutzkategorie erhöht wird. Wenn die bisherige Kategorie bei unter 700 Bewegungen „Higher Code Letter Aircraft“ beibehalten wird, findet eine Reduzierung der Kategorie somit nicht statt. Die Annahme von „Higher Code Letter Aircraft“ ist gemäß ICAO und der EU-VO 139/2014 zulässig und wird vielerorts so problemlos praktiziert.</p> <p>Wenn diese Änderung dazu führen sollte, dass die vorgehaltenen Löschmittelmengen auf das größte Luftfahrzeug der darunterliegenden Kategorie aufgestockt werden müssten, obwohl das Luftfahrzeug der höherliegenden Kategorie beispielsweise nur einmal in den 3 verkehrstärksten Monaten verkehrt, steht das Verhältnis des notwendigen finanziellen Aufwands (Beschaffung zusätzlicher Löschmittel, ggf. Fahrzeuge zur Bevorratung dieser Löschmittel und Feuerwehrpersonal, etc.) in keinem Verhältnis zum generierten Ertrag dieser einen Flugbewegung.</p> <p>Die dadurch vermeintlich generierte Erhöhung der Sicherheit ist äußerst kritisch zu betrachten.</p>



response *Noted*

The '700 movements' rule for the three consecutive busiest months applies to those aeroplanes normally using the aerodrome. The Agency follows the same principle as ICAO and, therefore, considers that no new requirements are imposed.

### 3. Proposed amendments — AMC5 ADR.OPS.B.010(a)(2) Rescue and firefighting services

p. 10

comment 45

comment by: ACV TRANSCOM / CSC TRANSCOM

Furthermore the number of agents isn't the only determining factor. There is also the standby situation of these agents that is important. To meet the global demands, is the presence of these agents at the aerodrome is enough or should be in constant standby to intervene? Often aerodromes (mis)use these agents to do other tasks (PRM, maintenance of the aerodrome (non rescue and fire services equipment), ...). Are these agents then accountable or aren't they? Is this an unforeseen event?

response *Noted*

Please refer to AMC6 ADR.OPS.B.010(a)(2)(d) where it is mentioned that 'any other duties carried out by rescue and firefighting personnel do not compromise the response, or their safety.'

comment 58

comment by: UK CAA

**Page No:** 10

**Paragraph No:** AMC5 ADR.OPS.B.010(a)(2)

**Comment :** It is recommended that paragraph (a) is amended as proposed below

**Justification:** To establish the exact start point from which 'response time' can be measured.

**Proposed Text:** Amend as follows:

*"(a) rescue and firefighting service achieves a response time not exceeding three minutes with an operational objective of not exceeding two minutes from the **time of the** initial call to the rescue and firefighting services, to any point of each operational runway, in optimum visibility and surface conditions, and be in a position to apply foam at a rate of, at least, 50 % of the discharge rate specified in AMC4 ADR.OPS.B.010 Table 1";*

response *Accepted*

The text has been amended as proposed.



comment	<p data-bbox="363 241 395 271">72</p> <p data-bbox="890 241 1477 271">comment by: <i>Union des Aéroports français - UAF</i></p> <p data-bbox="363 300 549 329"><u>UAF Comments</u></p> <p data-bbox="363 356 1477 470">(a) L'UAF demande la suppression des 2 mn dans le texte car la formulation de l'AMC prête à interprétation. De plus, l'objectif d'atteindre des 2 mn demande des investissements disproportionnés</p> <p data-bbox="363 497 1477 651">L'UAF propose de reformuler le paragraphe (a) de la façon suivante : « (a) rescue and firefighting service achieves a response time not exceeding three minutes <del>with an operational objective of not exceeding two minutes</del> from the initial call to the rescue and fire fighting services.</p> <p data-bbox="363 678 1038 707">L'UAF soutient pleinement l'ajout de « <i>from initial call</i> ».</p> <p data-bbox="363 734 608 763"><u>Courtesy translation</u></p> <p data-bbox="363 790 1477 864">(a)UAF requests to delete the 2 minutes in the text because the actual AMC wording is open to interpretation.</p> <p data-bbox="363 891 1477 1046">Moreover, the objective to reach the 2 min implies disproportionate investment. L'UAF proposes to reformulate paragraph (a) as follow : « (a) rescue and firefighting service achieves a response time not exceeding three minutes <del>with an operational objective of not exceeding two minutes</del> from the initial call to the rescue and firefighting services.</p> <p data-bbox="363 1072 975 1102">L'UAF fully supports addition of « <i>from initial call</i> ».</p>
response	<p data-bbox="363 1155 523 1184"><i>Not accepted</i></p> <p data-bbox="363 1229 1477 1303">The response time is not one of the topics of this NPA consultation. The proposed change aims to clarify the starting point when measuring the response time.</p>
comment	<p data-bbox="363 1393 395 1422">82</p> <p data-bbox="783 1393 1477 1422">comment by: <i>HIA - Highlands and Islands Airports Limited</i></p> <p data-bbox="363 1449 448 1478">Accept</p>
response	<p data-bbox="363 1532 437 1561"><i>Noted</i></p>
comment	<p data-bbox="363 1648 411 1677">105</p> <p data-bbox="842 1648 1477 1677">comment by: <i>Estonian Civil Aviation Administration</i></p> <p data-bbox="363 1700 1477 1774">After discussing response time requirements with our RFFS experts, they consider that the 2 minutes and 50% of the discharge rate is not realistic.</p>
response	<p data-bbox="363 1832 437 1861"><i>Noted</i></p> <p data-bbox="363 1901 1477 1975">The response time is not one of the topics of this NPA consultation. The proposed change aims to clarify the starting point when measuring the response time.</p>



**3. Proposed amendments — GM4 ADR.OPS.B.010(a)(2) Rescue and firefighting services**

p. 10-11

comment	<p>5 <span style="float: right;">comment by: <i>Aéroports de Lyon</i></span></p> <p>Is the term “contingency plan” different from “emergency plan” ?</p> <p>If yes, what are the precise differences between these two plans?</p>
response	<p><i>Accepted</i></p> <p>In order to avoid any misinterpretation, the term ‘contingency plan’ has been replaced by the term ‘contingency arrangements.</p>
comment	<p>14 <span style="float: right;">comment by: <i>KLM</i></span></p> <p>Proper maintenance has to be performed in times when no activity is applicable and breakdown of vehicules has to be unlikely when equipment is maintained well.</p> <p>unavailability of extinguishing agents I would not call that an unforeseen circumstance but bad planning.</p> <p>this has to be removed here</p> <p>(e) etc?</p> <p>either this has to be defined or deleted as it may mean anything and if not defined it does not mean anything.</p> <p>reduction in level ahs to be planned for reasons like heavy maintenance to vehicules making them unusable and a notam has to be issued for that. the timing to be in coordination with the aerodrome management and ops manager.</p>
response	<p><i>Noted</i></p> <p>The requirement for proper maintenance is included in AMC1 ADR.OPS.C.005. The Agency agrees that a well-maintained vehicle is unlikely to break down, however, this scenario cannot be excluded.</p> <p>The availability of extinguishing agents indeed requires good planning, however, the timely supply depends also on the supplier’s performance, which is often beyond the aerodrome operator’s control.</p> <p>Point (e) has been deleted.</p>
comment	<p>19 <span style="float: right;">comment by: <i>AENA</i></span></p> <p>What "facilities, equipment and resources" should be considered to reduce the level of protection temporarily? We consider necessary to clarify this point. The term "etc." is interpretable, and there are many references in the regulations that according to one</p>



category or another the airport should have some resources (vehicles, personnel,... but also reserve levels of extinguishing agents, rescue equipment, etc.). This might seem that if some of this resource is not available the level of protection should be reduced. For example, not having the required reserves of extinguishing agents, water refueling capability, special equipment for difficult environments ... implies to downgrade the level of protection? We consider that the legislation should analyze this and establish the aspects that imply to downgrade the level of protection. Thus, in the example above, although depending on the level of protection the airport should have a reserve of extinguishing agents, we consider that, if the airport have enough agents to cover the "minimum usable amounts of extinguishing agents", not having the reserve doesn't imply to downgrade the level of protection. The amounts of reserve are necessary to ensure sufficient foam for operations after occurring an accident, while obtaining more extinguishing agents, and therefore, the operations should be ensured with sufficient extinguishing agents.

response

*Noted*

The terms 'facilities, equipment and resources' are proposed to be deleted. Points (a) to (d) give an indication of the reasons for which a reduction in the level of protection may be required.

comment

21

comment by: AENA

What "equipment" should be included in the maintenance plan to include in the contingency plan to avoid unforeseen reduction of the level of protection? We suggest to detail more this equipment in order to clarify this point and not to have misunderstandings.

response

*Accepted*

The text has been revised to clarify that reference is made to equipment and vehicles for RFFS.

comment

22

comment by: AENA

We considered that the previous paragraph should be reworded because it relates a temporary reduction of the level of protection with resources that don't depend on the level of protection. Does an airport have to reduce the level of protection if there is a temporary incidence with the specialist rescue equipment for difficult environs? And what level will have this airport if as the requirement says, these resources are not used to calculate the level of protection? We propose to modify or delete the wording "Where the temporary reduction involves resources not used to calculate the aerodrome RFF category (eg specialist rescue equipment for difficult environs) Should be Notified details in the same way", because it doesn't imply a reduction of the level of protection.



response

*Noted*

The related GM provides information on factors that may affect the level of protection of RFFS provided at an aerodrome. The list is not exhaustive, and it is expected that the aerodrome operator will be able to determine the effect on the level of protection based on the available resources.

comment

44

comment by: ACV TRANSCOM / CSC TRANSCOM

The minimum number of rescue and firefighting vehicles are known, but on the European level negotiations are needed in the social dialogue committee how many agents (extinguishing and rescue) are minimum required for each category. In the meantime, these minima must be negotiated with the staff representatives on national level. Every month a report of the aerodrome safety committees should be brought on the well-being committees of the staff representatives at the aerodrome. The current ‘staff numbers definition’ isn’t enough.

Furthermore the number of agents isn’t the only determining factor. There is also the standby situation of these agents that is important. To meet the global demands, is the presence of these agents at the aerodrome is enough or should be in constant standby to intervene? Often aerodromes (mis)use these agents to do other tasks (PRM, maintenance of the aerodrome (non rescue and fire services equipment), ...). Are these agents then accountable or aren’t they? Is this an unforeseen event?

What are “unforeseen circumstances” that can lead to temporary reductions? Also industrial action? For us – in case of industrial action – an aerodrome can’t use the system of temporary reduction of the level of protection. In this case, closure of the aerodrome is the only safe and secure decision to take for the safety and security of passengers and workers.

The point “etc.” to use temporary reduction of the safety level is unsafe! You can’t give in this issue a carte blanche to the aerodromes. The NSA should decide for the concerned aerodrome if – in case of another circumstance than those that are defined – the level of protection is reduced. In case of this reduction is applicable, in any case the NSA should be informed in detail by the aerodrome.

response

*Noted*

The minimum number of RFF vehicles proposed by the Agency is included in AMC3 ADR.OPS.B.010(a)(2), and this number is according to ICAO Annex 14 recommendations.

The Agency does not specify the exact number of RFF personnel. It is the responsibility of the aerodrome operator to conduct a ‘Task And Resource Analysis’ in order to determine the exact number (see also AMC6 ADR.OPS.B.010(a)(2) and GM2 ADR.OPS.B.010(a)(2)).

Point (e) has been deleted.



comment	<p>59 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 10</p> <p><b>Paragraph No:</b> GM4 ADR.OPS.B.010(a)(2) 1<sup>st</sup> paragraph</p> <p><b>Comment:</b> It is recommended that the words ‘contingency plan’ be changed to ‘contingency arrangements’.</p> <p><b>Justification:</b> To Promote actively putting in place contingencies.</p>
response	<p><i>Accepted</i></p> <p>The text has been revised as proposed.</p>
comment	<p>60 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 11</p> <p><b>Paragraph No:</b> GM4 ADR.OPS.B.010(a)(2) sub-paragraph (e)</p> <p><b>Comment:</b> Sub-paragraph “(e) ‘Etc’ should e removed.</p> <p><b>Justification:</b> To correct a typographical error - this point adds no value</p>
response	<p><i>Accepted</i></p> <p>Point (e) has been deleted.</p>
comment	<p>61 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 11</p> <p><b>Paragraph No:</b> GM4 ADR.OPS.B.010(a)(2) 2<sup>nd</sup> full paragraph</p> <p><b>Comment:</b> In the paragraph starting ‘A temporary reduction...’ it is recommended that the words ‘in the same way’ are removed.</p> <p><b>Justification:</b> Promulgating a reduction in resources that are not used to calculate the aircraft category is not a requirement but would be good practice. How it is promulgated should be decided by the aerodrome operator to meet local circumstances.</p>
response	<p><i>Accepted</i></p> <p>The text has been revised as proposed.</p>



comment	<p>64 <span style="float: right;">comment by: <i>ACI EUROPE</i></span></p> <p>Point (e) "etc." we would prefer to see deleted as it would be problematic to interpret.</p> <p>As the list of circumstances by its nature cannot be exhaustive, the Agency could instead expand on the concept of unforeseen circumstances. One option could be to use reasoning akin to that of EU Regulation 261/2004 Article 5(3) and ECJ case-law on "extraordinary circumstances"</p>
response	<p><i>Accepted</i></p> <p>Point (e) has been deleted.</p>
comment	<p>66 <span style="float: right;">comment by: <i>KLM</i></span></p> <p><b>UNFORESEEN REDUCTION OF RFFS AERODROME CATEGORY LEVEL OF PROTECTION</b></p> <p>Comment:</p> <p>The word unforeseen should be deleted. The subject is reduction of level of protection and whether this is foreseen or not is not of importance as it has to be covered by a contingency plan.</p> <p><b>The following could be considered as unforeseen circumstances leading to temporary reduction of..</b></p> <p>Comment:</p> <p>Here also the word unforeseen is wrong to use the text should be:</p> <p>The following could be considered as circumstances leading to temporary reduction of ..</p> <p><b><del>(5)</del>(e) Etc.</b></p> <p>Comment:</p> <p>This has to be taken out or has to be specified.</p>
response	<p><i>Accepted</i></p> <p>Both proposals have been accepted and the text has been revised accordingly.</p>
comment	<p>73 <span style="float: right;">comment by: <i>Union des Aéroports français - UAF</i></span></p> <p><u>UAF comments</u></p> <p>Le plan de contingence doit être défini d'autant que l'on retrouve ce terme dans un texte relatif au droit des passagers qui sort du domaine de la sécurité.</p> <p>L'UAF propose soit de le supprimer où soit de le définir.</p>



	<p><u>Courtesy translation</u></p> <p>The contingency plan should be defined especially because we find this term in a text on passengers rights out of the field of safety.</p> <p>L'UAF proposes to delete it or to define it.</p>
response	<p><i>Accepted</i></p> <p>The term 'contingency plan' has been replaced with 'contingency arrangements' to avoid any misinterpretation.</p>
comment	<p><b>83</b> <span style="float: right;">comment by: <i>HIA - Highlands and Islands Airports Limited</i></span></p> <p>Accept</p>
response	<p><i>Noted</i></p>
comment	<p><b>88</b> <span style="float: right;">comment by: <i>ISAVIA ohf.</i></span></p> <p>Isavia suggests this part of the article (see the two paragraphs below) to be made an AMC instead of GM. The article is based on an Annex 14 standard and should at minimum be an AMC.</p> <p>(e) Etc.</p> <p>Such changes, including estimated time of the reduction, should be notified without delay to the appropriate Air Traffic Services (ATS) units and Aeronautical Information Services (AIS) units (see GM1 ADR.OPS.A.005 Aerodrome Data) to enable those units to provide the necessary information to arriving and departing aircraft.</p> <p>A temporary reduction should be expressed in terms of the new category of the rescue and firefighting service available at the aerodrome. Where the temporary reduction involves resources not used to calculate the aerodrome RFF category (e.g. specialist rescue equipment for difficult environs), details should be notified in the same way. When such a temporary reduction no longer applies, the above units should be advised accordingly.</p>
response	<p><i>Not accepted</i></p> <p>GM4 ADR.OPS.B.010(a)(2) provides further information and clarifications, therefore, it is not necessary to upgrade this GM to AMC level.</p> <p>Concerning the notification to be given when a reduced level of protection is applied, this is dealt in AMC1 ADR.OPS.A.005 and GM1 ADR.OPS.A.005.</p>



comment	<p data-bbox="359 271 395 309">89</p> <p data-bbox="1161 271 1477 309" style="text-align: right;">comment by: <i>Belgian CAA</i></p> <p data-bbox="359 331 1485 651">-The proposed amendment tries to clarify what an "unforeseen circumstance" is. However, the non-limitative ("etc...") list of events that could be considered as "unforeseen circumstances" does not add any clarification since every element of RFFS (vehicles, staff, extinguishing agents) is mentioned. The judgement whether this is unforeseeable depends on the specific circumstances. Moreover some elements are to be covered by a contingency plan (equipment and vehicles, staff,...) while unavailability of RFFS due to response to an (another) accident is really a case of "force majeure". Therefore we suggest to delete this non-limitative list.</p> <p data-bbox="359 674 1485 790">-We believe it is indeed important to limit the need for changes to the RFFS level of protection. We think therefore that the "contingency plan" requirement should be upgraded to AMC.</p>
response	<p data-bbox="359 835 440 869"><i>Noted</i></p> <p data-bbox="359 913 687 947">Point (e) has been deleted.</p> <p data-bbox="359 969 1485 1126">The use of the term 'contingency plan' has been interpreted by some commentators as another plan similar to the aerodrome emergency plan. In order to avoid this misunderstanding, the term 'contingency plan' has been replaced by 'contingency arrangements'.</p>
comment	<p data-bbox="359 1193 395 1232">93</p> <p data-bbox="1249 1193 1477 1232" style="text-align: right;">comment by: <i>IATA</i></p> <p data-bbox="359 1254 1230 1305"><b>On Page 11: GM4 ADR.OPS.B.010(a)(2) Rescue and firefighting services</b></p> <p data-bbox="359 1328 1362 1361"><b>UNFORESEEN REDUCTION OF RFFS AERODROME CATEGORY LEVEL OF PROTECTION</b></p> <p data-bbox="359 1384 1273 1417">With respect to the paragraph that starts with: <i>Such changes, i.e. see below.</i></p> <p data-bbox="359 1440 579 1473"><b>IATA Comment 5:</b></p> <p data-bbox="359 1496 1485 1574">The guidance material should be phrased wider and it is recommended to extend the sentence with: "<i>and to Operational Control Centers of airspace users</i>".</p>
response	<p data-bbox="359 1619 523 1653"><i>Not accepted</i></p> <p data-bbox="359 1697 1485 1854">It is not practical for the aerodrome operator to provide this information to the operational control centres of the airspace users. This is normally done by aeronautical information services (AIS) through publication of NOTAMs. The responsibility to collect preflight information lies always with the aircraft operator.</p>



comment	<p>112</p> <p>(e)</p> <p>Das „Etc.“ am Ende des Absatz „e“ ist völlig unbestimmt. Durch das „Etc.“ wird eine offene Aufzählung, anstelle einzelner, bestimmter Situationen, geschaffen.</p> <p>Der Absatz „e“ ist ersatzlos zu streichen.</p> <p>Der unbestimmte Begriff unterliegt einer unterschiedlich strengen Auslegung.</p>	comment by: <i>Flughafenverband ADV</i>
response	<p><i>Accepted</i></p> <p>Point (e) has been deleted.</p>	

**3. Proposed amendments — GM5A DR.OPS.B.010(a)(2) Rescue and firefighting services**

p. 11-14

comment	<p>62</p> <p><b>Page No:</b> 12</p> <p><b>Paragraph No:</b> GM5 ADR.OPS.B.010(a)(2) Example 3</p> <p><b>Comment:</b> In the subtitle ‘Example 3’ it is recommended that the words ‘in the busiest consecutive 3 months’ are added.</p> <p><b>Justification:</b> To be clear what is meant by the heading ‘movements’ in each of the tables.</p> <p><b>Proposed Text:</b> Amend to read:</p> <p>“Example 3 — Less than 700 movements (remission) <b>in the busiest consecutive 3 months</b>”</p>	comment by: <i>UK CAA</i>
response	<p><i>Accepted</i></p> <p>The text has been revised as proposed.</p>	
comment	<p>74</p> <p>No comment from UAF</p>	comment by: <i>Union des Aéroports français - UAF</i>
response	<p><i>Noted</i></p>	
comment	<p>84</p> <p>Nothing further to add</p>	comment by: <i>HIA - Highlands and Islands Airports Limited</i>
response	<p><i>Noted</i></p>	



comment	<p>94</p> <p>comment by: IATA</p> <p><b>On Page 13: Last example of Example 3 last paragraph:</b></p> <p><b>IATA Comment 6:</b></p> <p>This example is misleading and seems not consistent with <b>AMC2 ADR.OPS.B.010(a)(2) Rescue and firefighting services RFFS LEVEL OF PROTECTION (f)</b>. The question can be raised whether pilots of A321 aircraft (Cat 7) have to file an emergency and ask permission to land on the aerodrome due to the fact that the aerodrome is RFFS Cat 6? With other words: following the example it is allowed to accept a higher RFFS Cat aircraft, but according to par(f) the aircraft has to declare an emergency.</p> <p>IATA recommends to review the text in para (f) as proposed in our comment 4.</p>
response	<p><i>Noted</i></p> <p>Please refer to the response to Comment No 92 above.</p>

<b>3. Proposed amendments — GM6 ADR.OPS.B.010(a)(2) Rescue and firefighting services</b>	p. 14-16
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comment	<p>75</p> <p>comment by: <i>Union des Aéroports français - UAF</i></p> <p>No comment from UAF</p>
response	<p><i>Noted</i></p>

<b>3. Proposed amendments — AMC1 ADR.OPS.C.005 General</b>	p. 16
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comment	<p>28</p> <p>comment by: <i>CAA-NL</i></p> <p>It is not necessary to explicit mention RFF vehicles in this paragraph, because they are already part of the general context of vehicles which are necessary for the safety of aerodrome operations. CAA The Netherlands suggests to delete the inserted text.</p>
response	<p><i>Partially accepted</i></p> <p>The Agency prefers to keep the reference to the RFF vehicles and equipment in order to highlight their importance.</p>
comment	<p>76</p> <p>comment by: <i>Union des Aéroports français - UAF</i></p> <p><u>UAF Comments</u></p>



Le complément « *including those used by rescue and firefighting services* » n'apporte rien à l'AMC.

L'UAF demande sa suppression.

Courtesy translation

Complement of wording: « *including those used by rescue and firefighting services* » add nothing to the AMC.

L'UAF proposes to delete it.

response *Partially accepted*

The Agency prefers to keep the reference to the RFF vehicles and equipment in order to highlight their importance.

**4. RIA, 4.3. Analysis of impacts**

p. 20-23

comment

46

comment by: *ACV TRANSCOM / CSC TRANSCOM*

There is in any option and change where this kind of flexibility is defined a serious impact on the staff of the rescue- and fire services. Therefore negotiations should be organized on the European, national a company level. Also – by introducing this flexibility – safety and security on the aerodromes is also affected in the negative way! If changes are made on the regulation, it should be to increase safety levels instead of decrease it!

This exercise is only to introduce more flexibility in staffing and planning of the staff in these services, on the pressure of the industry.

response

*Not accepted*

The proposals are based on ICAO provisions.

comment

95

comment by: *IATA*

**On Page 22:**

***Concerning : Question to stakeholders — Economic impacts***

*Stakeholders are invited to provide quantified justification elements on the possible economic impacts of the options proposed, or, alternatively, propose another justified solution to the issue*

**IATA Comment 7:**

It is impossible to comment on the **economic impact** (additional costs) if these costs are largely unknown.



	To our opinion this is unfeasible. IATA is requesting EASA to provide more substance on the costs to better assess the economic impact.
response	<i>Noted</i>  The proposed AMC and GM do not introduce new requirements. They better clarify the existing text and align it with ICAO provisions, therefore, the economic impact is considered to be very low.
comment	102 <span style="float: right;">comment by: FAA</span>  I understand this, but a comment here may be added about the pilot making a determination based on the length of the runway and the airplane's ability to stop on the runway.
response	<i>Noted</i>  The proposal deals with RFFS. All the issues related to flight operations are dealt in Regulation (EU) No 965/2012.
comment	115 <span style="float: right;">comment by: AOPA Finland</span>  4.3.5. RFF level of protection should be applied <b>only</b> for all aerodromes serving all-cargo, mail and commercial air transport operations performing passenger transportation.
response	<i>Noted</i>  The provisions apply to aerodromes falling under the scope of the Basic Regulation.

**4. RIA, 4.4. Comparison and conclusion**

p. 23

comment	47 <span style="float: right;">comment by: ACV TRANSCOM / CSC TRANSCOM</span>  This exercise is only to introduce more flexibility in staffing and planning of the staff in these services, on the pressure of the industry.
response	<i>Not accepted</i>  The proposal better clarifies the existing text and aligns it with ICAO provisions.

