

Common Requirements & Safety Oversight IR

EASA 11th June 2018

The NATS logo is displayed in white, italicized, sans-serif capital letters. It is positioned on the right side of the slide, above the 'NATS Private' text. The background of the slide is dark blue with two thick, orange, curved lines that sweep across the lower half of the image, creating a dynamic, abstract design.

Peter Fielding – Regulatory Compliance

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The story so far...

- Involved in the various NPA's that led to the formation of this IR and supporting Annexes
- Through CANSO have had representatives on some Working Groups
- Currently hold a series of matrices which are available to all staff on our Intranet which detail our compliance
- They generally point to processes which are undertaken to satisfy the requirements in (EU) No 1035/2011 (as amended) and are updated as significant change occurs
- As the Rule took shape we recognised that my local management of those responses would no longer cope with the scope and scale of the rule (move from c27 pages to c265), particularly through it's development and implementation process
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The story so far...

- We formed a 'Common Requirements Steering Group' chaired by Directors of the company and with sponsorship from across the various areas to ensure sufficient coverage.
- Treated it as a Project forming a Plan to identify all the activities required
- Identified Sponsors, generally at Director level to support the work to be undertaken and to agree Focal Points
- Focal Points were identified for each topic area, generally this aligned with one per Annex, but some were further divided
- Most of those Focal Points led, or were involved in the consultation process
- Support to the various phases of the project formed by Subject Matter Experts

The story so far...

- Consultation work was managed by our International Affairs department who look after emerging legislation
- Responsibility handed over to my department when (EU) No 2017/373 was published
- Acted as Coordinator for these activities, supported by administration and Project Planner
- We have a Project Plan which takes us through to the 2nd January 2020
- After which it becomes a 'maintenance activity'

The story so far...

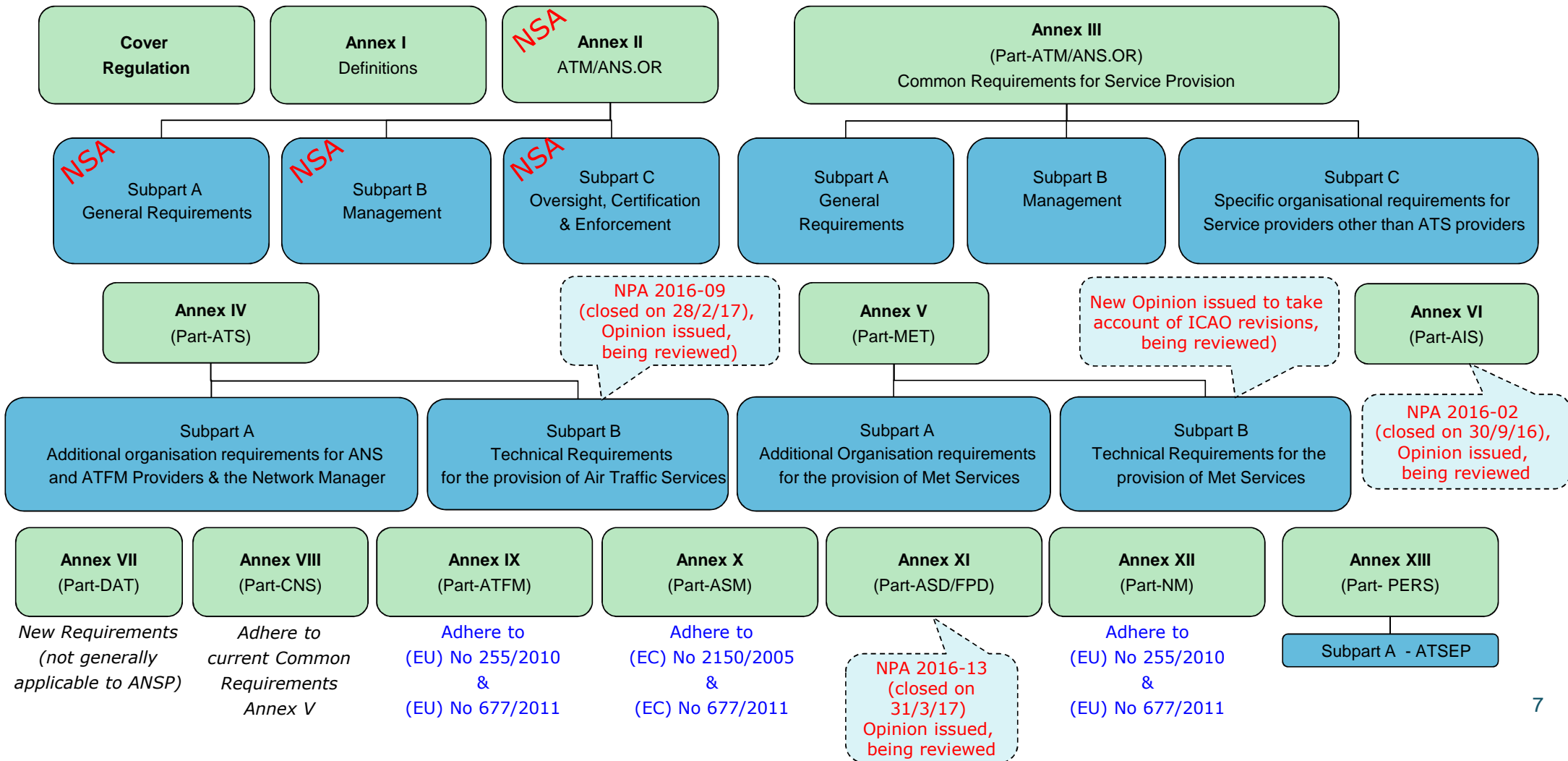
- Project Plan phases are:
 - Engagement with Regulatory bodies
 - CAA's ATM-IR Industry Consultative Group & Bi-lateral meetings
 - Through CANSO with EASA
 - Consultation/Influencing
 - Review drafts, assess impact and comment as appropriate
 - Consolidation of those comments also fed into CANSO
 - Review of EASA Comments Response Documents
 - Participation in Rule Making Groups (Initial and maintenance)
- Key aspect is liaison with our Regulator
 - Ensure interpretations match, another Workshop planned
 - Ideally establish common compliance matrices templates (for all)
- Communications is a key issue

Key Milestone activities

- Initial Assessment of IR
- Distribution of all published IR material to Focal Points & Subject Matter Experts (Cover Regulation, Annexes, Easy Access Rules and comparison to existing requirements/responses)
- Assessment of published content (Cover Regulation and Annexes) by SME's
- Collation of responses by Focal Points (ensuring consistency)
- Agreement with CAA Focal Points on interpretation of requirements (*Legislative Baseline*)
- Agreement between NATS and CAA on compliance format for the Cover regulation and each Annex or part thereof (i.e. Compliance matrices drafted)
- Submission of evidence, and agreement from CAA that it meets the requirements (*Compliance Baseline*)
- Issue of new Certificates by CAA to NATS (NERL & NSL)



New Common Requirements & Oversight IR



Notification of Change

‘Notification of ANSP, TO and ITO changes to the CAA’

UK CAA is implementing a formal process for the notification of changes to Air Navigational Service Provision and the training of Air Traffic Controllers.

The purpose is to ensure continued compliance with the current EU regulations 1035/2011 and 2015/340 and prepare in advance for the forthcoming regulation 2017/373. This process will also affect the way Supplementary Instructions and Temporary Operating Instructions are notified to the CAA.

Brings ‘notification of change’ responses into a common format for all UK ANSPs and move towards meeting some aspects of (EU) No 2017/373

Safety Support Assessment – Work in Progress



- Needed to understand the difference in requirements for the two types of provision: ATS and non-ATS
- As both types of provision are covered by NATS, we need to find a solution that is effective for the company
- For ATS the 4-part Safety Case well established in NATS (*continues to evolve*)
- Needed to recognise that the output from a 'Safety Support Assessment' is assurance that it meets a Specification
 - The non-ATS provider states and provides evidence that it does all that is captured in their specification, or
 - The ATS Provider goes out to market and says we want something that meets the following specification
 - *Still likely to be a Safety Case format (See Easy Access Rules)*
- ATS Providers are responsible for it's incorporation and utilisation in an operational environment, and it is they who need to consider Risk

Safety Support Assessment



- Need to ascertain what a good 'Argument' looks like to help guide practitioners
- Need to address Success Cases not just Failure Cases in support of Safety Goals and trace to safety criteria (workshops in Nov 18 & Jan 19 will address)
 - (EU) No 2017/373 doesn't talk about success cases explicitly but you need to set a goal, either for staying the same or for improvement
 - Setting out a safety goal will help us develop the safety criteria
- In time we will need to assess how the movement of traditional boundaries from physical assets towards supplied services will be treated by this IR
 - E.g. Handling of changes being made by third party service providers, does it require a safety support assessment to be carried out?
 - Particularly where we are one of the customers, not the customer
 - Need to agree an assurance envelope that they stay within
 - National Network providers have been considered out of scope for ATSEP, but are they out of scope here?

Questions?

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