



Comment-Response Document (CRD) 2023-08 (C)

RELATED NPA: 2023-08 (B) — RELATED OPINION: NO 02/2025 — RMT.0719 (SUBTASK 4B)

Regular update of the air traffic management / air navigation services rules

Implementing rules, acceptable means of compliance and guidance material

Proposed amendments to Regulation (EU) No 923/2012

24.09.2025

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1. Summary of the outcome of the consultation

Please, refer to Section 2.4 of Opinion No 02/2025.



2. Individual comments and responses

In responding to comments, EASA states its position as follows:

- (a) **Accepted** — EASA agrees with the comment and any proposed change is incorporated into the text.
- (b) **Partially accepted** — EASA either partially agrees with the comment or agrees with it but the proposed change is partially incorporated into the text.
- (c) **Noted** — EASA acknowledges the comment, but no change to the text is considered necessary.
- (d) **Not accepted** — EASA does not agree with the comment or proposed change.

(General Comments)

-

comment

15

comment by: *AOPA Sweden*

AOPA Sweden

24-02-01

A general comment from AOPA Sweden is that restricted and dangerous areas can be established with a short notice for instance in NOTAM. The problem is that the areas sometimes can be established during flight. This can be hazardous and AOPA would like to have a limitation in time when above mentioned areas are established by the local authorities.

So we propose that EASA states a rule that restricted and dangerous areas that are to be established, must be done so in a minimum time of at least 24 hours in advance.

AOPA Sweden
Fredrik Brandel
Member of the board

response

Noted

The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145 (prohibited and restricted areas), based on the existing content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.

Please, note that there may be cases where a NOTAM is the only means to promulgate such information, due to unforeseen circumstances, e.g. the need to establish such an area at short notice.

The text has been reworded, and a new GM has been added.



SERA.3215 Lights to be displayed by aircraft

p. 3

comment

6

comment by: French CAA

SERA.3215(f):

The proposed wording implies that the derogation should only be granted when no qualified personnel is on board whereas this possibility should be granted in any case, even with qualified personnel on board in accordance with the aircraft manufacturer's procedures. This would further lower global fuel consumption and noise and emission pollution.

In this matter, we propose the following rewording of the IR :

(f) By way of derogation from points (b)(3) and (d)(1), an aircraft being towed on the movement area of an aerodrome ~~without the presence of qualified personnel in the flight deck~~ may also be clearly illuminated with suitable colours by other means than the aircraft's own lights which as long as they do not create harmful dazzle to other aircraft or outside observers.

response

Accepted

comment

14

comment by: Berlin Brandenburg Airport (BER)

Berlin Airport welcomes this initiative.

response

Noted

comment

18

comment by: LFV Sweden

No comment

response

Noted

comment

40

comment by: AESA

The word "may" is normally used for GM, is not adequate for a requirement. In fact, all previous paragraphs under SERA.3215 use the word "shall". Perhaps a way to solve this could be to introduce in (b)(3) and (d)(1) the exemption for this cases in which there is no qualified personnel in the flight deck, stating the possibility to use other means, and remove proposed (f). Or maybe a GM could be used.

response

Not accepted

An exemption to the rule cannot be made by means of GM.



The purpose of point (f) is to provide another option in case the aircraft is not illuminated by its own lights; therefore, the word 'may' is used.

comment 41 comment by: AESA

The rationale introduces letter (f) for cases where the towing operations occur without flightcrew onboard, in order to avoid running the APU, etc. However, letter (f) proposes an alternative to points (b)(3) and (d)(1) and allows not turning on the lights mentioned in those, e.g. the anti-collision lights by day. It does not however, exempt from points (b)(1) y (b)(2). The first one requires turning on anti-collision lights during nighttime (unless "all aircraft moving on the movement area" is intended to mean moving by their own means) and the second one, requires, to the extent possible, to have lights that indicate the extremities of the structure. Turning on these lights would imply making use of the APU, so it feels like the proposed letter (f) wouldn't be enough to accomplish the rationale's goal.

response Accepted

comment 45 comment by: CAA Norway

AMC1 SERA.3215(f) Lights to be displayed by aircraft: Supported.

response Noted

SERA.8005 Operation of air traffic control service

p. 3

comment 19 comment by: LFV Sweden

Agreement whitout comment

response Noted

comment 27 comment by: IFATCA

2023.08 (C) SERA.8005 Operation of air traffic control service page 3	SERA.8005	(c)	Agree
	[...]		

response Noted



AMC1 SERA.3215(f) Lights to be displayed by aircraft

p. 4

comment

7

comment by: French CAA

The sole purpose of position lights is to indicate wingtips and a rear tail tip, but not to illuminate the contours of the aircraft. In the case of lighting from a tow truck, the aim is to illuminate the contours of the aircraft. However, it will be technically impossible to illuminate the rear of the aircraft considering the position of the tow truck. Hence, even if the general objective shall be preserved, the illuminated zones will necessarily be different. As a consequence, we propose the alternative wording of § a) as follows :

(a) The means of illumination used should allow the aircraft wingtips and tail fuselage to be seen as clearly as if the aircraft position lights were turned on

The first part of § b) is useless considering it corresponds to the nominal situation where the aircraft lights are illuminated. In addition, based on what is already experimented and presented in TEB ADR, the conditions of the derogation may consist in an illumination system displayed from the tow truck and whose part of the characteristics (colours, flashing/non-flashing) would be equivalent to the forward position. In this objective, we propose to modify §b) as follows :

(b) appropriate green and red forward position lights should may be displayed either at the wingtips of the aircraft or at from the tow truck to indicate the relative path of the towed aircraft.

response

Partially accepted

The text has been revised to include new point (c), as proposed.

comment

12

comment by: Berlin Brandenburg Airport (BER)

Illuminating the tail of an aircraft from the front (tow truck) is challenging. It would require a second vehicle to follow the towed aircraft.

Illuminating the wings from the front (spot lights on tow truck) might result in glare effects.

Rephrasing should be considered to reflect the safety objective of this requirement, which is good visibility of the towed aircraft as such and a clear indication of the direction in which the aircraft is moving. This can e.g. be achieved by using red and green lights to illuminate the aircraft from the front.

response

Please, see the response to comment #7.

comment

26

comment by: LFV Sweden



response	No comment
	Noted

SERA.8012 Application of wake turbulence separation	p. 4
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comment	20	comment by: <i>LFV Sweden</i>
	Agreement whitout comment	
response	Noted	

comment	28	comment by: <i>IFATCA</i>		
	<table border="1" style="width: 100%;"> <tr> <td style="width: 30%; vertical-align: top;"> 2023.08 (C) SERA.8012 Application of wake turbulence separation <i>page</i> 4 </td> <td style="width: 40%; vertical-align: top;"> The provisions in point (a) shall not apply to: (1) arriving VFR flights; (2) IFR flights that have requested, or have been instructed and have accepted, to maintain own separation from another aircraft. </td> <td style="width: 30%; vertical-align: top;"> <i>propose to amend:</i> (3) departing VFR flights exempt by the EU 2016/1185 SERA article 4 <i>rationale:</i> Missions of rescue and police helicopters are time-critical, serious situations might escalate, human lives might be lost due to delayed departures. These pilots are very experienced they are able and allowed to land anywhere and should also be allowed to depart on own discretion regarding wake turbulence. </td> </tr> </table>		2023.08 (C) SERA.8012 Application of wake turbulence separation <i>page</i> 4	The provisions in point (a) shall not apply to: (1) arriving VFR flights; (2) IFR flights that have requested, or have been instructed and have accepted, to maintain own separation from another aircraft.
2023.08 (C) SERA.8012 Application of wake turbulence separation <i>page</i> 4	The provisions in point (a) shall not apply to: (1) arriving VFR flights; (2) IFR flights that have requested, or have been instructed and have accepted, to maintain own separation from another aircraft.	<i>propose to amend:</i> (3) departing VFR flights exempt by the EU 2016/1185 SERA article 4 <i>rationale:</i> Missions of rescue and police helicopters are time-critical, serious situations might escalate, human lives might be lost due to delayed departures. These pilots are very experienced they are able and allowed to land anywhere and should also be allowed to depart on own discretion regarding wake turbulence.		

response	Not accepted The exemption invoked applies in multiple scenarios and a precedent could be created if specifically mentioned in this context. Hence, specific local rules for the operation of State aircraft should be designed according to local requirements. In addition, there is the safety aspect of wake turbulence that needs to be considered regardless of the type of operation.
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comment	29	comment by: <i>IFATCA</i>
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response	2023.08 (C) SERA.8012 Application of wake turbulence separation <i>page 4</i>	(c) In all cases listed in point (b), the air traffic control unit shall issue a caution for wake turbulence.	ICAO wording in 6.5.3.5 is "shall issue a caution of possible wake turbulence" Suggest <u>to copy</u> this word by word.
	Accepted		

1.2. Draft acceptable means of compliance and guidance material (draft EASA decision) p. 4

comment	21 comment by: <i>LFV Sweden</i> No comment
response	Noted

comment	30 comment by: <i>IFATCA</i> <table border="1" style="width: 100%;"> <tr> <td data-bbox="375 1094 1279 1184"> 2023.08 (C) AMC1 SERA.3215(f) Lights to be displayed by aircraft ALTERNATIVE LIGHTING <i>page 4</i> </td> <td data-bbox="1279 1094 1339 1184"> <input type="checkbox"/> [...] </td> <td data-bbox="1339 1094 1421 1184"> <input checked="" type="checkbox"/> Agree </td> </tr> </table>	2023.08 (C) AMC1 SERA.3215(f) Lights to be displayed by aircraft ALTERNATIVE LIGHTING <i>page 4</i>	<input type="checkbox"/> [...]	<input checked="" type="checkbox"/> Agree
2023.08 (C) AMC1 SERA.3215(f) Lights to be displayed by aircraft ALTERNATIVE LIGHTING <i>page 4</i>	<input type="checkbox"/> [...]	<input checked="" type="checkbox"/> Agree		
response	Noted			

AMC1 SERA.3145 (a) Prohibited areas and restricted areas p. 5

comment	1 comment by: <i>Uppsala Flying Club</i> We strongly support this proposed AMC. Pilots without local knowledge (particular GA pilots), are today exposed to the risk of violating defacto restricted areas without having a reasonable means of knowing it and thus without fault of their own possibly face prosecution. It can be noted that a similar problem exists in France (and possibly other countries) which have imposed minimum altitudes in some areas higher than those stipulated by
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response	<p>SERA. GM1 to SERA.3105 Minimum Heights explains that when this is necessary, appropriate "structures" such as restricted areas should be put in place, which has not happened in the case of France. That GM could be promoted to an AMC in order to stress its importance. Also, EASA could initiate action against France for imposing minimum altitudes in conflict with SERA.3105.</p> <p>Noted</p> <p>EASA considers that the AMC is clear and no further GM is required.</p>
comment	<p>2 comment by: Mickey Coggins</p> <p>This looks like a very good rule change. It might be useful to consider how the presentation of the P and R areas will impact paper charts and EFBs like Foreflight and Skydemon.</p>
response	<p>Noted</p> <p>The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145, based on the existing content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.</p> <p>Therefore, this new AMC is not meant to impact on products and services as the ones mentioned in the comment.</p>
comment	<p>3 comment by: Axel-Stéphane Smorgrav</p> <p>AOPA France supports this amendment and the rationale.</p> <p>Following the same reasoning, simply colouring a chart in certain colours with the intent to prohibit or restrict flights over certain areas below a certain height, is not in its own sufficient for aviation purposes, nor in line with the Chicago Convention.</p> <p>The current GM1 SERA.3105 opens up the possibility for the competent authority to implement higher minimal heights than those prescribed by SERA.5005 (f), but is somewhat vague about the means by which to implement increased minimal heights, and does not explicitly state that those need to be "duly published".</p> <p>Back in 1957, France decided to make such restrictions "easily comprehensible" by colour-coding the charts published by one national editor, according to the minimum heights ("<i>Arrêté du 10 octobre 1957 relatif au survol des agglomérations et des rassemblements de personnes ou d'animaux.</i>"). This leaves the lateral extent of such restrictions to the appreciation of that chart provider, excluding any other chart providers from publishing the same restrictions. When SERA was introduced, the competent authority used the wording in GM1 SERA.3105 to justify maintaining the colour-coding scheme.</p>



response	<p>For consistent application of the principle that such restrictions need to be <i>duly published</i>, GM1 SERA.3105 should be modified, or replaced by an AMC, to clarify the nature of the "appropriate structures" as being "controlled, restricted or prohibited airspace". Then those minimal heights would need to be "duly published" in accordance with AMC1 SERA.3145 (a).</p> <p>Noted</p>
comment	<p>4 comment by: <i>DFS Deutsche Flugsicherung GmbH</i></p> <p>Suggested change: "A prohibited area or restricted area is duly published only when it is published in the aeronautical information publication (AIP) of the responsible Member State and or, when necessary, a relevant NOTAM has been issued in this respect."</p> <p>Considering ED-R that have to be established and published on short notice, the necessary lead time to publish them in AIP would make it impossible to establish such ED-R. Therefore, the two parts of the sentence need to be connected by the word OR, as indicated above.</p>
response	<p>Partially accepted</p> <p>The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145, based on the existing content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.</p> <p>The text has been reworded and GM has been added.</p>
comment	<p>9 comment by: <i>DSNA</i></p> <p>This AMC is in relation wit the promulgation of P,D,R areas. It should be better placed in Reg. 2017/373 as amended (Part FPD, AIS, Airspace change process,...), not in SERA which ie mainly meant for pilot/controller relation.</p>
response	<p>Noted</p> <p>The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained exclusively in point SERA.3145 (prohibited and restricted areas), given that it has been reported as not been uniformly understood/applied in the EU.</p>
comment	<p>10 comment by: <i>DSNA</i></p> <p>"when necessary" means that a NOTAM should always be preceded by an AIP. However, there are many cases where a (temporary) P,D,R area is promulgated ONLY by NOTAM</p>



response	<p>Partially accepted</p> <p>The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145, based on the existing content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.</p> <p>The text has been reworded and GM has been added.</p>
comment	<p>11 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i></p> <p>AMC1 SERA.3145 (a) Prohibited areas and restricted areas, page 5</p> <p>The AIP Supplement is missing as means for duly publication of prohibited or restricted areas and is proposed to be added. AIP Supplement is used for temporary changes of long duration and information which contains extensive text and/or graphics, which often is the case for these area types.</p>
response	<p>Partially accepted</p> <p>The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145, based on the existing content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.</p> <p>The text has been reworded and GM has been added.</p>
comment	<p>17 comment by: <i>FOCA Switzerland</i></p> <p>We propose to add a sentence. The final text would read:</p> <p>"Existing text should be amended as follows: A prohibited area or restricted area is duly published only when it is published in the aeronautical information publication (AIP) of the responsible Member State and, when necessary, a relevant NOTAM has been issued in this respect. <u>Temporary prohibited and restricted areas which need to be published on short notice, can be published via NOTAM only.</u> "</p> <p>Rationale:</p> <p>For certain events where a prohibited or restricted area is established the AIRAC cycle for an AIP publication cannot be complied with as the areas are established on short notice (e.g. aircraft accident). Moreover, certain areas are activated only for a short duration (e.g. for aircraft displays). In such cases a publication via NOTAM should suffice.</p>
response	<p>Partially accepted</p> <p>The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145, based on the existing</p>



content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.

The text has been reworded and GM has been added.

comment

32

comment by: CAA-Denmark

The proposed new AMC1 to clarify what is meant by duly published is not supported by DCARA.

Throughout a year there are numerous situations that require the establishment with a very short notice of a restricted area of a temporary nature, at times only a day or two, which for that very reason cannot undergo the normal AIP publication process.

In situations where safety requires the establishment of a P/R/D area with very short notice, e.g. due to accidents, terrorist attacks or other situations where the police or the military request the establishment of a P/R/D area, this must take place without undue delay. For that reason the normal AIP publication process cannot be adhered to, and instead a NOTAM will be issued.

Editorial comment: The "title-reference" should be changed to AMC1 SERA.3145. Point (a) do not exist in SERA.3145.

response

Partially accepted

The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145, based on the existing content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.

The text has been reworded and GM has been added.

The numbering of the AMC has been amended.

comment

35

comment by: FLCH Aviation Consult

The proposed "AMC1 SERA.3145 (a)" is not supported.

Rationale: Quite often situations require the establishment of a restricted area of a temporary nature with a very short notice - at times only a day or two. In such situations the normal AIP publication process is not possible, and for that reason the issuance of a NOTAM shall be permitted.

"Situations" include e.g. accidents, terrorist attacks or other situations where the police or the military request the establishment of a P/R/D area.

Editorial note: SERA.3145 does not contain a subpoint (a).

response

Partially accepted



The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145, based on the existing content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.

The text has been reworded and GM has been added.

The numbering of the AMC has been amended.

comment

38

comment by: *skyguide Compliance Management*

A strict reading of the proposed amendment could give the impression that danger, prohibited, restricted areas can only be established through publication in the AIP. However, in urgent cases, the only means of establishing such areas may be by NOTAM alone. It would be appropriate to clearly reflect this point in the amendment.

response

Partially accepted

The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145, based on the existing content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.

The text has been reworded and GM has been added.

comment

42

comment by: *AESA*

The Rationale reads in the third paragraph "...needs to also be published in the en-route section of the AIP of the responsible State, but also the respective aeronautical charts". However, the text of the AMC1 only states explicitly the need for publishing in AIP, omitting the aeronautical charts. For the sake of clarity, maybe charts should also be mentioned.

response

Accepted

The text has been reworded and GM has been added.

comment

43

comment by: *AESA*

Point (3) in Rationale reads "all necessary information relevant to such areas is published in section 'ENR 5.1 Prohibited, restricted and danger areas' of the AIP and the relevant aeronautical charts". Again, aeronautical charts are mentioned, but they are not mentioned in the text of the proposed AMC.

response

Accepted

The text has been reworded and GM has been added.



comment	44	comment by: <i>Norwegian Air Traffic Controller Association</i>
	In regards to "duly published, prohibited and restricted areas", where it is stated that the area needs to be published in the AIP. How will that effect the need for emergency areas to be published via NOTAM, for instance in relation to accidents etc. where police will need to create a non-premanent prohibited or restricted area? Are those kinds of areas excluded from the need to be "duly published" ?	
response	Partially accepted	
	The purpose of the proposed AMC is to facilitate the common understanding of the phrase 'duly published' which is contained in point SERA.3145, based on the existing content of the relevant requirements regulating the various aeronautical products, including NOTAM, and which remain unaffected.	
	The text has been reworded and GM has been added.	

AMC2 SERA.3215(f) Lights to be displayed by aircraft

p. 5

comment	8	comment by: <i>French CAA</i>
	<i>In AMC2 reference is made to CS 25. Yet this provision applies to aircraft lights which answer to different characteristics and have a different purpose than tow truck lights. In the case of lighting from a tow truck, the aim is to illuminate the contours of the aircraft and not to indicate the position of its extremities. As the means of illumination are different, the characteristics of the lights will as well be different. Therefore, referring to CS.25 to define the characteristics of a tow truck lights won't be appropriate and the demonstration of compliance will be technically impossible. Since the colour requirement is already mentioned in AMC1 SERA.3215(f), AMC2 is neither necessary nor appropriate. As a consequence, we propose to remove AMC2.</i>	
response	Accepted	
	The AMC will be deleted.	
comment	13	comment by: <i>Berlin Brandenburg Airport (BER)</i>
	The wording of AMC2 SERA.3215(f) should be rephrased due to several reasons:	
	Applicability: While the intention is understood to ensure that the exterior illumination of aircraft resembles the one when the aircraft's lights are switched on, it must be noted that CS 25.1385 is only applicable to large aeroplanes. Hence, it should be clarified which specification applies for aircraft not subject to CS-25.	



Feasibility:
 With the reference to CS 25.1385 the draft AMC subsequently requires that towed aircraft display rear position lights within dihedral angle A (aft) which is formed by two intersecting vertical planes making angles of 70 degrees to the right and to the left, respectively, to a vertical plane passing through the longitudinal axis, as viewed when looking aft along the longitudinal axis.

Considering that a towbar-less tow truck is positioned at the front of and partly below an aircraft, there is the risk that wings and nacelle of the towed aircraft obstruct any light beam meant to replace the rear position light / meant to illuminate the tail. Hence, additional escorting vehicles at the aft of the aircraft would be required to meet the requirements of CS 25.1387. This in turn would induce additional fuel consumption, and noise and emission pollution which the draft AMC intends to reduce in the first place.

Finally, it should be taken into account that the underlying rationale for the specification of lights is to prevent collisions during flight - i.e. the most demanding situation. (see ICAO Annex 08, section 8.4: "The lights required by Annex 2 [...] to be displayed by aeroplanes in flight or operating in the movement area of an aerodrome shall have intensities, colours, fields of coverage and other characteristics such that they furnish the pilot of another aircraft or personnel on the ground with as much time as possible for interpretation and for subsequent manoeuvre necessary to avoid a collision. In the design of such lights, due account shall be taken of the conditions under which they may reasonably be expected to perform these functions." Note 1: "It is likely that lights will be viewed against a variety of backgrounds, such as typical city lighting, clear starry sky, moonlit water and daytime conditions of low background luminance. Furthermore, collision risk situations are most likely to arise in terminal control areas in which aircraft are manoeuvring in the intermediate and lower flight levels at closing speeds that are unlikely to exceed 900km/h (500kt).

For the separation of taxiing aircraft and towed aircraft other specifications (e.g. similar to vehicular standards) may be equally sufficient.

response	Noted The AMC will be deleted.
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comment	23	comment by: <i>LFV Sweden</i>
	No comment	

response	Noted
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comment	39	comment by: <i>AESA</i>
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	This AMC states that "Specifications of lights should be in accordance with CS 25.1385 of ED Decision 2020/006/R". This implies that, effectively, this alternative lightning systems will have to comply with the same requirements as the position lights already in use, thus giving little margin for alternative lightning systems that require a power source other than the APU.
response	Noted The AMC will be deleted.

GM1 SERA.8012(b)(2) Application of wake turbulence separation

p. 6

comment	5 comment by: <i>British Helicopter Association</i> Correct spelling mistake in IFR FLIGHTS MAINTAING OWN SEPARATION. Remove the G on MAINTAING
response	Partially accepted Spelling has been checked and corrected accordingly.

comment	16 comment by: <i>FOCA Switzerland</i> We propose to publish this text as an AMC and not as a GM.
response	Accepted The initial proposal has been reconsidered, and a new AMC to point SERA.8005(c) has been introduced instead.

comment	25 comment by: <i>LFV Sweden</i> Agreement whitout comment
response	Noted

comment	33 comment by: <i>EASA Focal Point for AustroControl ANSP-issues</i> GM1 SERA.8012(b)(2): In point (b) of the proposed GM1 ATS.TR.220(b)(2) and GM1 SERA.8012(b)(2) the word "and" between (1) and (2) should be replaced with "or" as there is no requirement that both points are fulfilled at the same time.
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response	Accepted
comment	<p>36 comment by: <i>Austrian CA for ATM/ANS oversight</i></p> <p>Ref. (b):</p> <p>Comment: Replace “and” between sub-paragraphs (1) and (2) by “or”.</p> <p>Justification: To avoid the interpretation that sub-paragraphs (1) and (2) of paragraph (b) should both be fulfilled in order to apply own separation.</p> <p>Proposal/Proposed Text: N/A.</p>
response	Accepted
comment	<p>48 comment by: <i>IATA</i></p> <p>Unclear how this is guidance material to ensure wake turbulence separation when the flight is maintaining own separation.</p> <p>It rather looks like GM on when own separation could be acceptable, but it does not address at all the wake turbulence issue...</p> <p>See related comment in document B of the NPA.</p>
response	Noted

AMC1 SERA.8012 Application of wake turbulence separation	p. 6
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comment	<p>24 comment by: <i>LFV Sweden</i></p> <p>Agreement whitout comment</p>
response	Noted
comment	<p>31 comment by: <i>IFATCA</i></p>



<p>2023.08 (C) AMC1 SERA.8012 Application of wake turbulence separation CATEGORISATION OF AIRCRAFT FOR THE PURPOSES OF WAKE TURBULENCE SEPARATION MINIMA <i>page 6</i></p>	<p>(a) [...] to protect for potential wake encounters.</p>	<p>(a) [...] to protect against / of / from or to prevent potential wake encounters</p>
<p>response</p>	<p>Accepted</p>	
<p>comment</p>	<p>34 comment by: EASA Focal Point for AustroControl ANSP-issues AMC1 SERA.8012: We are not aware of an AMC1 SERA.8012, therefore, in our opinion, it cannot be amended.</p>	
<p>response</p>	<p>Noted AMC1 SERA.8012 was initially introduced with NPA 2022-04 and the proposal was to amend this newly introduced AMC with a new point (a) and to keep the existing text as point (b). After re-evaluation, it has been decided to introduce the text as GM due to its nature.</p>	
<p>comment</p>	<p>37 comment by: Austrian CA for ATM/ANS oversight We are not aware of an AMC1 SERA.8012, therefore, in our opinion, it cannot be amended.</p>	
<p>response</p>	<p>Noted AMC1 SERA.8012 was initially introduced with NPA 2022-04 and the proposal was to amend this newly introduced AMC with a new point (a) and to keep the existing text as point (b). After re-evaluation, it has been decided to introduce the text as GM due to its nature.</p>	
<p>comment</p>	<p>46 comment by: IATA Proposed to leave it as "Wake turbulence separation minima are defined for scenarios and pairs of aircraft". Rationale: the second part of the sentence makes little sense, as ATC objectives are not fulfilled if protection for wake encounters is insufficient, as it can be a safety hazard... However it is acknowledged that better information can always help.</p>	



response	<p>There is insufficient guidance material on how wake turbulence separation minima can be ensured in the case of own separation</p>
	<p>Not accepted</p> <p>After re-evaluation, it has been decided to introduce the text as GM due to its nature.</p>
comment	<p>47 comment by: IATA</p> <p>Not clear what are the proposed contents for (b), is there any missing piece of information? please clarify</p>
response	<p>Noted</p> <p>AMC1 SERA.8012 was initially introduced with NPA 2022-04 and the proposal was to amend this newly introduced AMC with a new point (a) and to keep the existing text as point (b).</p> <p>After re-evaluation, it has been decided to introduce the text as GM due to its nature.</p>

