

Selected for WS.	Issue Nr.	Issue Topic	Reference	Summary/Comment	Rationale	Proposed Solution by sponsor of topic	Category: Rule change, interpretation issue or exchange of good practices	Proposed priority
Yes	1	ICAO transposition	N/A	Assess EASA rulemaking process to ensure timely transposition of ICAO provisions, while ensuring industry consultation and capacity of industry's & MS to adapt to change and implement that change.	Common understanding on global harmonisation of rules to be in the interest of safety and global harmonisation of rules. However, C-19 has led to significant financial and HR constraints with regards to developing and implementing of new ADR rules. This should be taken into account.	Continue cooling down in rulemaking for ADRs in principle while ensuring fast transposition of ICAO regs where necessary (e.g. GRF) and/or where rule updates facilitate rule clarification, simplification and greater operational flexibility.	Rule change	High
Yes	2a	RFFS	AMC1 ADR.OPS.B.005(b) AMC3 ADR.OPS.B.010(a)(2)	Clarifications regarding requirements for rescue in water/swampy area.	139/2014: AMC3 ADR.OPS.B.010(a)(2) uses the term “near” when describing the requirement for rescue equipment and services the airport operator should coordinate. CA interprets this to be within a fixed distance and angle (sector) from the airport, not referring to regulations. The term “life-saving flotation equipment...(deployed) as expeditiously as possible” used in the GM gives room for different interpretations.	Prepare requirements with regard to: response time, distance criteria (1,000 meters only perpendicular to RWY?), Fleet capacity (dimensioned only for the aircraft that normally use the airport or for the largest aircraft?). The regulations often use the term "the aircraft normally use the airport". How should this be interpreted?	Rule change	Medium
Yes	2b	RFFS Response Time	EASA AMC.ADR.OPS.B.010(a)(2)	Some national authorities interpret the response time requirement on parts of the movement area other than the operational runway identically as for operational runways, although the EASA regulation does not specify this. According to EASA AMC.ADR.OPS.B.010(a)(2), this time should be “calculated (...) under optimum conditions and included in the Aerodrome Emergency Plan”. In contrast the ICAO Annex 14 recommendation says “The operational objective of the rescue and firefighting service should be to achieve a response time not exceeding three minutes to any other part of the movement area, in optimum visibility and surface conditions.”, similar to the two minutes requirement for the operational runways.	Formulations in EASA AMC.ADR.OPS.B.010 (a) (2) are very unclear and provide a basis for different interpretations.	Rephrase EASA AMC.ADR.OPS.B.010 (a) (2) so that it is unambiguous and does not allow for interpretation. Alternatively, provide clear EASA guidelines for interpretation in a formal SIB to all member states. It is important to take care of all aspects related to response time. For example, if the response time is only related to the arrival of extinguishing agents at the scene of the accident, and not the entire staff in the published category.	Rule change	High
Yes	3	Innovation & interpretation of rules	ADR.OPS.B.037	The methodology of inspecting /assessing runway surface conditions using technological solutions like pavement sensors rather than psycial inspections is not taking into consideration by the CA. Other examples: simulators, LED lights, regulation and monitoring loops, technical standard aircraft, robots etc.	The methodology to perform a runway assessment on a wet RWY to issue a Runway Condition Code, is based on a (subjective) visual inspection performed by a qualified inspector through an undefined tool That is not subject to any calibration or maintenance. The objective should be to reduce avoid subjectivity as much as possible while improving accuracy and allow use of modern technology to make an assessment, e.g. on runway conditions.	AMC to accept and facilitate the utilisation of pavement sensors as an approved methodology to determine contaminant depth, in support of the issue of RCR. Exchange of best practices in order to encourage CAs to support innovative technologies.	Implementation support	High
Yes	4	Aerodrome surroundings & Limitations of Control of ADR	Essential Requirements & ADR.OPS.B.075 & ADR.OPS.B.020	The requirements for Obstacle Monitoring and control of aerodrome surroundings (including e.g. wildlife hazard management) by the ADR Operator is only feasible to a certain extent. ADR surroundings can include local government plans for land or sea use, garbage dumps, fish plants, agriculture use, environment protection, etc. Mitigation measures can often only be implemented by ADR operators with the full cooperation of other stakeholder. These are in particular other (local) authorities which do not fall under the oversight of NAAs. Without the ability of National Aviation Authority to coordinate aeronautical requirements related to aerodrome surroundings and obstacle monitoring (e.g. for joint responsibility/collaboration btw. National and Local authorities for wildlife and environmental regulations, land-use planning, construction approvals etc.) the ADR could only fulfil its obligation provided that other parties	Obstacle limitation surface areas are frequently outside an ADR's boundaries. Therefore, ADR operators may have no authority over such obstacles. Depending on the MS regulatory framework, ADRs are unlikely to be notified by their CA. German ADR operators are unable to determine whether objects pose a threat to the safe operation of aircraft, as they are not the entity responsible for designing flight procedures and neither is the CA, who needs to rely on the ANSP and its regulatory body. While monitoring obstacle surfaces may be manageable to a limited extent, ADR operators in Germany are often unable to mitigate risks, as they can neither oppose proposed construction nor amend flight procedures.	Good practices should be exchanged on how different entities responsible for aerodrome surroundings, e.g. wildlife or obstacle limitation surfaces can best work together and how ADR operators can reach out to those authorities. It should clearer which entity is responsible for which part of the obstacle monitoring. Where ADR operators are mandated by	Implementation support	Medium

Yes	5	Management of change	ADR.OR.B.040	<p>Management of Change: Clearer explanations of difference between changes that do require prior approval of the CAA and changes that do not.</p> <p>Also, greater clarity on the Change Management process with more onus on the ADRs implementation of the SMS.</p>	<p>ADR.OR.B.040 differentiates between changes that require prior approval of the CAA and those changes that do not. Only few changes are subject to regulatory approval. As a consequence, for most "minor" changes a "light-handed" approach would be sufficient. Experience at several ADRs show that CAAs adopt a one-size-fits all procedure that turns every change into a rather lengthy exercise.</p> <p>Also, ADR.OR.B.040 is sometimes interpreted by local CA with the listing of those items not requiring prior approval being very small. It is not clear what are the assessment criteria to be decide if a significant change requires approval and the Aerodrome managing all remaining changes (subject to CA audit). The current process is considered to be too vague and open to different interpretations.</p> <p>Some ADRs have to apply for each type of change in writing and can only implement a change after having received written confirmation (read: approval) by the CA. Background information / practical <u>example from one ADR</u>: Aircraft stands have several stop markings for the nose landing gear. Due to different aircraft sizes / configurations B737/A320 family aircraft have to stop on marking 1, B747 have to stop on marking 2, and B777/A346/A380 have to stop on marking 3, etc. <u>Problem</u>: Adding the markings for a new aircraft type to a stop line or moving an existing stop line or adding a new stop line requires written approval by the CA. It is ACI's understanding that this type of change should not requires prior approval according to current rules.</p> <p>Additionally, the wording of ADR.AR.C.035, letter h) hints at a simplified procedure for all those changes that do not require prior approval: "...the Competent Authority shall approve a procedure..." But in the end the authority only approved a procedure whose practical implementation resulted in a striking resemblance to the procedure for changes as per ADR.OR.B.040, letter a), comprising the following steps:</p>	<p>Provide additional clarification showing that there are two different change types that should be handled in different ways in order to allow for a quick(er) implementation of "minor" changes.</p> <p>A more mature MoC process should be developed that places more ownership on change at the aerodrome. It should take into account significance assessment (based on novelty, complexity, interdependence etc.). Minor or merely editorial changes should be clearly exempted from requiring prior approvals.</p> <p>Clarify the change management process for changes not requiring prior approval as in ADR.C.040 (f). " For changes not requiring prior approval, the Competent Authority shall assess the information provided in the notification sent by the aerodrome operator in accordance with ADR.OR.B.040(d) to verify their appropriate management and verify their</p>	exchange of good practices	High
Yes	6	Implementation Plans for new requirements (rules IR and AMC/GM) and Transposition of new Certification Specifications CS	ADR.AR.C.020(a)(2) ADR.OR.C.005 Aerodrome Operator Responsibilities (a)(1) ADR.OR.B.050 Continuing compliance with the Agency's certification specifications.	The regulation 139/2014 and EASA AMC, GM and CS have change regularly since the target date for the conversion of certificates. Most of the new requirements entered in to force without a reasonable time for implementation. This creates a legal uncertainty for operators and NCA. + Changing infrastructure to accommodate new CS	<p>Some authorities have adopted a system using a implementation plan for regulatory changes. When regulation is changed, an updated certification basis (CB) and demonstration of compliance with IR (DoCIR) is provided to the operators. They are requested to report their compliance in this CB and DoCIR and provide a implementation plan for the not or partially compliant CS and IR. The implementation plan is subjected to acceptance by the competent authority. The implementation plan is considered during the inspections organized to verify implementation of the amended regulation.</p> <p>There is a need to clarify the authorities' responsibility for guidance on the implementation of new requirements as well as clarification of the authorities' responsibility for ensuring the implementation of new CSs as the process is not clear particularly with regards to other flexibility tools.</p>	<p>Clarification of the authorities' responsibility for guidance on the implementation of new requirements as well as clarification of the authorities' responsibility for ensuring the implementation of new CSs.</p> <p>Could be linked with potential usage of flexibility tools in WS.</p>	Implementation support	High
No	7	Technological Change / Change LED lights replacement cycle	ADR.OPS.C.015	The current implemented regulation given in ADR.OPS.C.015 and relating AMC1 and CS ADR-DSN.S.895 (a) as well as service indications given in ICAO Doc. 9137 Airport Service Manual Part 9 –Airport Maintenance Practices are based on the classic halogen technology. Many airports however, now have installed to LED lights with longer life cycles and better luminosity.	New LED lights have a much longer lifespan and deterioration cycle compared to traditional glow wired lamps. Taking into account their higher quality and longer life cycles reduces cost while at the same time improving sustainability.	The servicing and replacement cycle of LED lights should be in line with the extended requirements proposed by the manufacturers. EASA should define an additional regulation framework for servicing LED lights reflecting their longer life cycle and higher quality and based on manufacturers' product recommendations.	Rule change	High Problem will be solved by ADOP/4 WP08 CLARIFY THE USE OF DESIGN VALUE FOR MAINTENANCE OF VISUAL AIDS
No	8	Psychoactive substances definition	ADR.OR.C.045	Use of alcohol, psychoactive substances and medicines Alignment with SERA rules to ensure consistency of regulations.	This IR should align with SERA description, as SERA requirements: a) Gives more precise and detailed definitions of "psychoactive substances" (Article 2 § 104) that are not found in the aerodrome regulations; b) provides additional information on " 'safety-sensitive personnel " (Article 2 / point #116) to those found in ADR.OR.C.045; c) Makes each person individually responsible for not carrying out their duties under the influence of these substances.	Align IR requirements to those of SERA rules.	Rule change	Medium
No	9	RFFS		Modification of requirements related to dry powder, as today better extinguishing agents are available.	<ul style="list-style-type: none"> - Dry powder will damage aircraft engines and all electrical equipment. - Large clouds of dry powder can reduce visibility to incident management teams and/or flight crew. - Large clouds of dry powder can harm passengers and/or could cause panic. - Dry powder is not generally used in a real fire (analyse accident data). - Difficult for training with dry powder larger then 50 kg. - Dry powder is used as complementary agent. The types of the complementary agents are at AMC level. However, the issue of extinguishing agents needs to be addressed in a holistic manner, taking also into account the use of fluorine free foams. 	Adjust regulation This item could be merged with other extinguishing agents linked to environment and/or electrified equipment.	Rule change	Medium
No	10	Heliports	ICAO Annex 14, Vol. 2	Include criteria to determine RFFS category of helicopters and associated requirements (chapter 6 Annex 14, Vol 2).	Although some requirements for helicopter facilities inside airports are being developed, the part of RFFS is not completely developed	Adjust regulation as and when ICAO Annex 14, Vol. 2 is transcribed in to European legislation.	Rule change	Low
No	11	CS ADR.DSN.T.915	CS ADR-DSN.T.915	(d) and (e): it makes no sense to talk about 240 m on a code 1 or 2 runway.	Remove inconsistency.	Request ICAO to make a change to remove the inconsistency.	Rule change	Medium

No	12	RWY configuration	Proposed new regulation	Management of RWY configurations where the beginning of one RWY is not the same that the end of the other. RWY end lightning (see corresponding document from AENA).	Develop specific regulation to deal with this particular situation.	Develop specific regulation to deal with this particular situation.	Rule change	Medium
No	13	RFFS / electrification of vehicles, aircraft, equipment	Proposed new regulation	RFFS requirements for electrical and hydrogen airplanes. In the short-to medium term for equipment (vehicles & ADR equipment). In the longer run for aircraft.	Current RFFS requirements (quantities of water, foam, number of vehicles, etc) are based on kerosine based jet airplanes. With new types of airplanes based on other technologies such electrical or hydrogen, it becomes necessary to review and if required adapt current RFFS requirements to take account of electrification of aircraft and ground vehicles. The tactical approach and the means to deal with accidents, fires and emergencies might be different. Increasing electrification of aircraft and ground equipment requires adaptation of regulations in the medium term.	It is necessary to study this item in a expert group involving airports, authorities and airplane manufacturers in order to clarify any potential adaptation of RFFS fire fighting preparedness related to electrified machinery.	Rule change	Medium
No	14	Aerodrome Maintenance (proposed by email on 10.02.22)	AMC1 ADR.OPS.C.015(d) Maintenance of visual aids and electrical systems "In no case should a non-needed marking be painted over" ED Decision 2021/003/R REMOVAL OF MARKINGS	The requirements given in the AMC remove any flexibility in executing marking works and finally will enlarge the timeframe e.g. to achieve conformity.	Remarking devices/machines are not available with all marking companies. The larger equipment is used by the third party contractors all over Europe and even beyond. Planning and executing marking works is dependent not just on the availability of marking / marking removal equipment but also on weather conditions. Works can only be scheduled during non-operational hours. Scheduled works often need to be postponed / interrupted because of equipment breakdown or adverse weather conditions which leads in additional coordination works. Hence, coordinating marking works (small or large) which need to be carried out during non-operational hours and often involving more than one company is highly challenging. When taking into account weather conditions as well it becomes clear that marking and marking removal works cannot be carried out at short notice.	Specify the coverage of this regulatory framework to RWYs and TWYs within the maneuvering area.	Rule change	
No	15	Width of runway strip (proposed by email on 22.02.22)	CS ADR-DSN.B.160	The minimum width of the RWY strip for code number 3 is currently the same as for code number 4, namely 75m. To our knowledge, it has already been considered to reduce the minimum width for code 3 by 5m to 70m.	This could be justified by the improved technical equipment of the aircraft. Such a reduction and consequently an adjustment of the value (8)C of Table D-1 from 93m to 88m would mean a massive relief of the very narrow conditions and non-conformities between RWY and TWY K (DAAD004 - CS.ADR-DSN.D.260) as well as the positioning of holding bays TWY B,D,E (DAAD008 - CS.ADR-DSN.D.340) for LSZB.	To reduce the minimum width for code 3 by 5m to 70m.	Rule change	Is already solved by ADOP/4 by DP3 presented by CH, was accepted. SL awaited. Email to Prado 4.3.22 by SPO
No	16	RFFS & Limitations of Control of ADR & Cross-Domaine alignment of rules	N/A	Emergency Exercises: Obligation for the national aeronautical authorities to coordinate aeronautical requirements, related to response in case of emergency, with Civil Protection Authorities (national and or local), to ensure both rules are compatible. National/Regional Civil Protection systems and their requirements, must be taken into account and integrated into aeronautical regulation. Improvement of coordination between airlines and airports in aeronautical emergencies treatment. Main coordination points should be specified, not only for airports, but also in regulations for airlines including airlines from third countries if they operate in Europe.	Civil protection units as well as airports have to meet requirements drafted for ADRs (in full or in part) in the event of an emergency. ADRs often do not have the power to make third parties fulfil their obligations. Coordination between authorities and other stakeholders (e.g. civil protection units, law enforcement, RFFS, airlines etc.). Airport and airlines often have their own requirements relating to emergency procedures which may not be coordinated. For airports, regulation specifies that emergency procedures must be coordinated with every party involved. This coordination is based on general specifications which have to be interpreted by each National Authority. This causes divergence within the EU. Airports must demonstrate emergency coordination with airlines. However, ADRs often do not have access to airline emergency procedures because of restricted content and/or airlines do not have personnel at the airport (charter airline or has few operations). These problems are compounded with third country operators.	The responsibility to achieve the involvement of civil protection units to fulfil aeronautical requirements, should remain on the National Aeronautical Authority, and the regulation should include it. Regulations for emergency responses between different actors (airports, airlines but where applicable also other authorities) should be aligned.	exchange of good practices	Medium
No	17	Hierarchy of Rules & Role/Purpose of SIBs and SD	N/A	Clarify rule hierarchy: ADRs and some CAs have sometimes different interpretation on role of guidance material (GM) and safety information (SIB). In addition, the content of SIBs, how they are assessed and implemented should be clarified as they are frequently used as basis for audits by CAs.	CA have been auditing GM as part of their oversight role. This involves significant additional admin and resource burden on ADRs.	Clarify hierarchy of rules, their roles and purposes including purpose of GM as means for clarification and explanation of IRs and AMCs. ALSO explain the purpose of SIBs and how they should be used. Note: ACI fully agree that GM and SIBs are different. Both should not be treated in the same way as IRs or AMCs. However, some CA do use GM and SIBs as mandatory and auditable materials in the same way as IR/AMC rather than as material for consideration/information. Clarification on hierarchy of rules with clear explanations of roles, purpose and requirements following the issuing of SIBs would therefore be welcome. Such clarification could	Implementation support	High

No	18	Flexibility provisions (Art 70, DAAD, ELOS, SC, AltMoC etc)	Flexibility Tools	Flexibility tools and when and how to use them. Management of airport non-compliances because of ADR regulation updates. Use of tools, such as: AltMoC, ELoS, DAAD, Special Condition etc.	Tools to manage non-compliances that may appear due to regulation updates should be developed. At least, some issues, such as: adaptation period, the possibility to exempt from the fulfilment of requirement (under certain circumstances).	Establish common understanding to apply flexibility provisions and to use them appropriately. Can flexibility provisions be used to manage non-compliances due to regulation (IR,AMC,GM, CS) updates? There are two aspects to consider, i.e. Flexibility Tools or Transition Periods depending on the issue. Changes in regulation (particularly concerning infrastructure) can easily lead to non-compliances. Where such a non-compliances, depending on the situation, take more time to address, different options exist (i.e. change mangement or flexibilty tools). Differenes exist in the Member States on how to deal with such changes. In some MS, CAs agree with longer-term change plans, but are hesitant to consider flexibilty tools. While this approach is pragmatic and can work well, it is not clear to what extent such long-term remedial plans are in compliance with EASA regulations. Therefore, a clarification of how	Implementation support	High