

Consultation on Proposed Amendment of CAP 168 – Licensing of Aerodromes

Comment Response Document

CAP 168 – Part A Explanatory Note				
No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
1	General	Options	Does this mean that countries must accept all ICAO SARPs and they can no longer file variations to ICAO documents?	Comment Noted: It is the ability of ICAO Contracting States to file differences with ICAO SARPs which is fundamental to the application of the Chicago Convention. UK CAA policy is to remove differences where considered reasonable and practicable.
2	General	Impacts	Any proposals that impact on design and operating requirements will inevitably create an economic impact particularly smaller licensed aerodromes.	Comment Noted: The CAA believes that the adoption of some of the changes outlined in this amendment should be weighed against the intended improvements to safety that the CAA considers these changes will bring.
3	General	Para 4	The statement that the proposed changes will not create an economic impact on licensed aerodromes is incorrect.	Comment Noted: The CAA believes that the adoption of some of the changes outlined in this amendment should be weighed against the intended improvements to safety that the CAA considers these changes will bring.

4	General Comment	Impacts – Economic, Page 4	This states that the proposed changes “will not create an economic impact on licensed aerodromes”. This has been challenged by some of our members who operate in the general aviation market and who feel that compliance with some of the proposed revisions will involve cost impacts.	Comment Noted: The CAA believes that the adoption of some of the changes outlined in this amendment should be weighed against the intended improvements to safety that the CAA considers these changes will bring.
5	General	Explanations	These changes WILL cause costs	Comment Noted: The CAA believes that the adoption of some of the changes outlined in this amendment should be weighed against the intended improvements to safety that the CAA considers these changes will bring.
6	General	Conclusion of the Preliminary Impact Assessment	It would have been helpful to have included these conclusions , who was involved in the impact assessment and what was considered to constitute “a limited economic impact”.	Comment Noted: The CAA believes that the adoption of some of the changes outlined in this amendment should be weighed against the intended improvements to safety that the CAA considers these changes will bring.

PART B – PROPOSED CHANGES

CAP 168 – Introduction

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
7		Para 12	Text begins “Where it is necessary” – Who decides "Where it is necessary" and what does it mean exactly? In what circumstances would it be necessary in the UK for an ICAO SARP that has not been incorporated into CAP168 to be applied? This sentence seems to contradict itself. Greater clarity would be welcome.	Comment Noted: Text has been amended to provide additional clarity.
8		Para 12	Text states “.... will be assessed....” – Who does this and how?	Comment Noted: Text has been amended to provide additional clarity.
9		Para 12	2 nd para. Text states “application for a licence will be assessed are those laid out in ICAO Annex 14” – If all licences are assessed against this document why do we need CAP 168?	Comment Noted: Text has been amended to provide additional clarity.
10		Para 12	“application” – Does this imply that this only concerns airports ‘applying’ for a licence, i.e. first time applicants and does not apply to those already holding a licence ?	Comment Noted: Text has been deleted.
11	General	Para 12	The first paragraph is unclear. Under which circumstances would it be necessary for an aerodrome to apply an ICAO SARP that has not been adopted into CAP 168? The terminology implies initially that implementation of a SARP is ‘necessary’ and then that requirement to implement shall be assessed on a case by case basis. Further clarification is required.	Comment Accepted. Text has been amended to provide additional clarity.

12	General	Para 12	Do we have to adopt ICAO SARPs fully or not? The first sentence that aerodromes will be assessed on a case by case basis. and the second states that it will be assessed against the ICAO SARPs.	Comment Accepted. Text has been amended to provide additional clarity.
13	General Comment	Para 12	The first paragraph of the proposed text is fundamentally illogical and very confusing. If an ICAO SARP has not been implemented (in CAP 168) it has no relevance to airport operators unless that SARP has been adopted by the UK and promulgated via a NOTAL. However there is no mention of the NOTAL process in this proposed wording. Is CAA proposing that all ICAO SARPS will be automatically accepted by the UK? The proposed wording also states that it may be “necessary” for aerodrome operators to implement SARPS on a “case by case basis”, but how will aerodrome operators know that they are required to implement these SARPS? This section needs rethinking to make it absolutely clear how ICAO SARPS will be adopted and promulgated.	Comment Accepted. Text has been amended to provide additional clarity.

CAP 168 – Glossary of Terms

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
14	General	Para N/A Approach definitions	This is good and clarifies the situation regarding Lower than standard Category I operations.	Comment Noted.
15	General		The inclusion of the updated definitions from ICAO Annex 14 and EU Ops is welcome. Pedantic point: please note EU Ops is a publication of the European Commission, 'owned' by the Air Safety Committee of the Commission and not by EASA.	Comment Noted.

CAP 168 – Chapter 1

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
16	General	Para 7.3	How does the CAA consider that these requirements differ from those described in CAP 729? Should CAP 729 be referenced in this paragraph?	Comment Noted: The CAA sees no need to include reference to CAP 729, as these proposals do not differ from the guidance currently noted therein and they are intended to reinforce the licence conditions. However, CAP 729 is due to be republished in order to reflect changes to procedures to be used to notify the CAA of developments on aerodromes, and the new document shall be known as CAP 791 and titled 'Procedures for Changes to Aerodrome Infrastructure'.
17	General	Para 7.3	Add reference to CAP 729	Comment Noted: See response to comment # 1.
18	General	Para 7.3	This paragraph should make reference to CAP 729 regarding procedures for the management of on-aerodrome development and changes to physical characteristics	Comment Noted: See response to comment # 1.
19	General	Para 7.3	The reference to 'procedures that describe processes' – this is tautological.	Comment Noted: The proposed text has been amended accordingly.
20	General	Para 7.3	Why is this necessary – there is a whole CAP on aerodrome development. And the new para 6.1.4 (w) in chapter 2 sums it up more succinctly.	Comment Noted: CAA considers that inclusion supports the licence conditions.
21	General	Para 7.3	This paragraph should reference to CAP 729. Chapter 2 Paragraph 6.1.4 which refers to "procedures for the management of on-aerodrome development and changes to physical characteristics", similarly, should reference CAP 729 – also noted later, see Chapter 2, Para 6.1.4.	Comment Noted: See response to comment # 1.

22	General	Para 7.3	Reference should be made to CAP729	Comment Noted: See response to comment # 1.
23	General	Para 11	Although we welcome this addition, there should be more detail published elsewhere to cover the framework and procedures of how an aerodrome is placed in this category, who is responsible to overseeing this (as we are all aware everyone interprets areas of the CAP's in different ways – inspectors included), and what sort of support will the CAA offer to the aerodrome if placed with these actions?	Comment Accepted. The proposed text has been amended to reflect the comments raised.
24	General	Para 11	The four case scenarios included in NOTAL 2008/12 assist in understanding the On-Notice procedure. It would be beneficial to users understanding if this were to be included in Para 11.	Comment Noted: CAA considers that the explanation provided in Paras 11.3 and 11.4 of the proposed text provides the necessary detail. The NOTAL will be cancelled on publication of the amendment.
25	General	Para 11	The introduction of the definition “requiring “Special Attention” was not included in NOTAL 2008/12 and it is unclear where this fits with the On-Notice process (eg. NOTAL 2008/12 describes Case 1 – Application of normal Oversight and then Case 2 – Application of the On Notice procedure). No reference is made to notification process to Aerodromes that have been identified as “requiring “Special Attention”. We feel that Aerodromes should be notified if they have been identified as an Aerodrome requiring ‘Special Attention’ as they are with the “On Notice” notification process.	Comment Accepted. The proposed text has been amended to reflect the comments raised.
26	General	Para 11	Aerodromes requiring Special Attention - Earlier clarification (and transparency) of this ‘internal’ CAA process would have been appreciated.	Comment Accepted. The proposed text has been amended to reflect the comments raised.
27	General	Para 11	This could this be written more succinctly. Also, the term ‘deliverables’ in 11.5 is jargon, please would you stick to plain English?	Comment Noted: The word ‘deliverable’ is defined as something that can be done, that is a realistic expectation.

28	General	Para 11	The proposed wording should include the four case scenarios detailed in NOTAL 2008/12 and upon which the wording is based. The inclusion of the four scenarios will assist understanding of the process.	Comment Noted: CAA considers that the explanation provided in Paras 11.3 and 11.4 of the proposed text provides the necessary detail. The NOTAL will be cancelled on publication of the amendment.
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CAP 168 – Chapter 2

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
29	General	Para 2.3.4	The imposition of the need to illuminate a windsock is an example of where unnecessary and perhaps considerable expense may be incurred for no gain in safety for non-public transport operation licensed for night operation having a radio. Such a change would only be justified by the provision of accident statistics making the case.	<p>Comment Noted: The CAA adopts the Standards and Recommended Practices (SARPS) contained within Annex 14 Vol 1 (Aerodrome Design and Operations). Chapter 5, Para 5.1.15 of Annex 14 recommends that: “Provision should be made for illuminating at least one wind indicator at an aerodrome intended for use at night”.</p> <p>The CAA considers the provision of an illuminated wind direction indicator to provide an added safety benefit to pilots, whether in-command, under instruction or supervision.</p> <p>In removing prescriptive design and specification requirements for the lighting of wind direction indicators at the same time, the CAA recognises the advent of technological enhancements and innovations (i.e. LED, Solar, Battery powered lighting) that may be considered for illuminating visual aids, which may reduce installation, operating and maintenance costs to aerodrome operators.</p>
30	General	Para 6.1.4	Reference should be made to CAP729	Comment Noted: See response to comment # 1.
31	General	Para 6.1.4	Add reference to CAP 729	Comment Noted: See response to comment # 1.
32	General	Para 6.1.4	This should reference CAP 729.	Comment Noted: See response to comment # 1.
33	General	Para 6.1.4	This should reference CAP 729.	Comment Noted: See response to comment # 1.

34	General	Para 7.1.2	Please clarify the minimum acceptable scale / paper size. Please confirm that the 'aerodrome plan' referred to here should have the same content as that required in CAP 168 Chapter 1 Section 5, or be a copy of the aerodrome plan submitted as part of CAP 232, or something different? Does this need to be resubmitted every year, or just when the physical layout changes?	<p>Comment Noted: The plan referred to in Chapter 1, Section 5 is smaller scale and shows the boundaries of the licensed area.</p> <p>The aerodrome plan should be submitted in hard copy at 1:2500 scale. It enables the CAA to have a more detailed plan of the aerodrome, against which it can assess obstacles etc. The aerodrome plan need not be submitted annually, only when surveys or changes to the aerodrome dictate a need.</p> <p>Details for the submission of aerodrome plans and scaled drawings for the purpose of aerodrome development and treatment of obstacles will be set out in CAP 791 Chapter 2. Additional guidance is also set out in CAP 232 (Aerodrome Survey), Chapter 3, Para 1.</p>
35	General	Para 7.1.2	There is already a provision to supply an aerodrome plan at 1:2500 scale in paper form. Electronic copies often contain more detailed information that can be accommodated in paper form, particularly developments the treatment of obstacles.	<p>Comment Noted: The CAA requires hard copies of the aerodrome plan. Details for the submission of plans for the purpose of aerodrome development and treatment of obstacles will be set out in CAP 791 Chapters 2 and 5. Additional guidance is also set out in CAP 232 (Aerodrome Survey), Chapter 3, Para 1.</p>
36	General	Para 7.1.2	Clarity is required on the minimum scale / size of paper on which the aerodrome plan is to be presented. In addition, clarity is required on the time periods when such aerodrome plans have to be submitted e.g. annually or when the physical layout changes?	<p>Comment Noted: The plan referred to in Chapter 1, Section 5 is smaller scale and shows the boundaries of the licensed area.</p> <p>The aerodrome plan should be submitted in hard copy at 1:2500 scale. It enables the CAA to have a more detailed plan of the aerodrome, against which it can assess obstacles etc. The aerodrome plan need not be submitted annually, only when surveys or changes to the aerodrome dictate a need.</p>

37	General	Para 7.1.2	Confirmation required on what size of paper the Aerodrome Plan is to be submitted on and what the requirement is for submission i.e. annually or upon physical aerodrome change.	<p>Comment Noted: The plan referred to in Chapter 1, Section 5 is smaller scale and shows the boundaries of the licensed area.</p> <p>The aerodrome plan should be submitted in hard copy at 1:2500 scale. It enables the CAA to have a more detailed plan of the aerodrome, against which it can assess obstacles etc. The aerodrome plan need not be submitted annually, only when surveys or changes to the aerodrome dictate a need.</p>
38	General	Para 7.1.2	Aerodromes often already submit hard copies of plans through the survey submission process and for individual developments also submit scale charts. Is this requirement referring to submission in these circumstances or is this an additional requirement? This requirement is more applicable with relation to aerodrome development situations so consideration should be given to this requirement being incorporated into CAP729 as a required submission for aerodrome developments. This would ensure that scale drawings utilised for assessment during development works are absolutely current.	<p>Comment Noted: The plan referred to in Chapter 1, Section 5 is smaller scale and shows the boundaries of the licensed area.</p> <p>The aerodrome plan should be submitted in hard copy at 1:2500 scale. It enables the CAA to have a more detailed plan of the aerodrome, against which it can assess obstacles etc. The aerodrome plan need not be submitted annually, only when surveys or changes to the aerodrome dictate a need.</p> <p>Details for the submission of aerodrome plans and scaled drawings for the purpose of aerodrome development and treatment of obstacles will be set out in CAP 791 Chapter 2. Additional guidance is also set out in CAP 232 (Aerodrome Survey), Chapter 3, Para 1.</p>
39	General	Appdx 2B Para's 9.4 & 9.5	This is good and clarifies the situation regarding Lower than standard Category I operations.	Comment Noted: No further action required.

40	General	App 2A, para 6.2.5	CAP 168 is not the place to determine whether aircraft operations are safe or not. This accords with the guidance given in the Introductory Note to Chapter 1 of ICAO Annex 14, which states: <i>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 is not intended that these specifications limit or regulate the operation of an aircraft.</i> Any unserviceabilities in ground infrastructure should be reported to pilots, as accurately as possible, to enable pilots-in-command to determine the safest course of action. It will be noted in that regard that EU Ops, Sub Part E, Appendix 1 to Ops 1.430, Table 6a specifically addresses the effect on landing minima of failed or downgraded equipment. Action: Retain existing text	<p>Comment Noted: The removal of observations, when a partial power failure extinguishes 50% of the lights to be counted by aerodrome personnel, has two factors:</p> <ol style="list-style-type: none"> 1. The increased risk of errors at the ROP due to difficulties in identifying which lights can be seen; 2. Non-compliance with CAP 168 Chapter 6 Table 6.1 Minimum Percentage of Serviceable Light Fittings. In that table column 1 CAT I Landing requires 85% of the edge lights to be above 50% luminous intensity.
41	General	App 2B, para 4.7	Replace 'bird' with 'wildlife'	<p>Comment Noted: This is not included in this consultation.</p> <p>The CAA is cognisant of the amendment in Annex 14 from Bird to Wildlife, however, there would need to be a consequent change to the Air Navigation Order prior to a change of wording in subsequent CAPs.</p> <p>CAA proposes no change at this time.</p>

42	General	App 2B, para 4.8	The risk of inadvertent runway incursion by an aircraft, or aircraft misrouting, is increased in low visibility conditions. Wherever possible this risk should be minimised by keeping taxiway routings as simple as is practicable. This can be best achieved by restricting the available taxiway system wherever possible to a single route from the apron to the runway, with intermediate junctions closed, a clearly defined runway entry point, holding point and a separate exit taxiway and return route for landings or rejected takeoffs. Adequate use of taxiway direction and location ground marking as per Figure 7C.6 should be employed.	Comment Noted: This is not included in the consultation.
43	General	App 2A, para 6.2.5	CAP 168 is not the primary place to dictate how aircraft are to be operated. The RVR should continue to be calculated and reported to aircraft as before, together with details of the lighting outage(s). Pilots can then use their operating manuals and procedures to decide the action, if any, to be taken.	<p>Comment Noted: The removal of observations, when a partial power failure extinguishes 50% of the lights to be counted by aerodrome personnel, has two factors:</p> <ol style="list-style-type: none"> 1. The increased risk of errors at the ROP due to difficulties in identifying which lights can be seen; 2. Non-compliance with CAP 168 Chapter 6 Table 6.1 Minimum Percentage of Serviceable Light Fittings. In that table column 1 CAT I Landing requires 85% of the edge lights to be above 50% luminous intensity.
44	General	App 2B, para 7.3	To read "Adequate safeguards against runway incursions should be in place, such as limited taxi routing, surface movement radar assistance and stop-bars, RWY AHEAD markings and/or physical barriers at runway access points.	Comment Noted: This is paragraph is not included in the consultation. The use of "Runway Ahead" is addressed in CAP 168 Appendix 2D, Paragraph 2.2.

45	General	App 2B, para 9.4 and elsewhere	There appears to be lack of consistency in the document in referring both to Cat 1 / 2 / 3 and I / II / III. We favour the EU Ops convention of using Roman numerals rather than Arabic numbers.	Comment Accepted: Roman numerals shall be used throughout.
46	General	App 2B, para 9.4 and elsewhere	The document shows a lack of standardization on Cat 1/2/3 and Cat I/II/III. It should reflect whatever the physical signs show on the aerodrome. The font of signage should be of a standard 'non Romanised' type.	Comment Accepted: Roman numerals shall be used throughout.
47	General	Appdx 2 C, Para 1.2	Why is this limited to implementation? The ICAO Safety Management Manual Doc 9859 uses the wording: "It is important that the size and complexity of the SMS be appropriate for each organization" and that wording seems clear.	Comment Accepted: The proposed text shall be re-drafted to remove the term implementation.
48	General	Appendix 2C	This is good and clarifies CAA position.	Commented Noted.
49	General	Appendix 2C	This is rather long considering that there are several other CAPs dealing with SMS aimed at aerodrome operators. Unless CAA is going to get rid of one of those...? One very difficult aspect to writing an SMS is that you have to read so many documents.	Comment Noted. The CAA is currently reviewing its SMS guidance in various CAPs in order to rationalise and standardise the SMS guidance we give.

50	General	Appendix 2C	<p>The clarity of the appendix could be improved. For example: “[An SMS] should be able to display to the aerodrome organisation and prove to the CAA that all activities result in continuous compliance with the safety requirements...”. Activities do not result in compliance, activities are active not passive.</p> <p>How about saying what it says in ICAO Doc 9859 i.e. “Safety is the state in which the risk of harm to persons or of property damage is reduced to, and maintained at or below, an acceptable level through a continuing process of hazard identification and risk management. And a safety management system (SMS) is an organized approach to managing safety, including the necessary organizational structures, accountabilities, policies and procedures.”</p>	Comment Accepted: Appendix 2C has been re-drafted.
51	General	App 2C, para 1	<p>To read "An effective Safety Management System (SMS) forms the primary safety oversight covering the way an aerodrome manages safety. An aerodrome SMS should demonstrate an identifiable and easily audited systematic control of the management of safety at an aerodrome. It should be able to display to the aerodrome organisation and prove to the CAA that all activities result in continuous compliance with the safety requirements and, by applying lessons learned, makes measurable improvements to the overall level of safety".</p>	Comment Accepted: Appendix 2C has been re-drafted.
52	General	Appendix 2C – Para 1.2	<p>It is the entire SMS that should be commensurate with the size and complexity of the aerodrome services provided, not just its implementation. Delete the words “The implementation of..”</p>	Comment Accepted: Appendix 2C has been re-drafted to remove the term ‘implementation’.

53	General	Appendix 2C, para 1.1	<p>“.....prove to the CAA that all activities result in continuous compliance.....”</p> <p>The requirement to prove that all activities result in continuous compliance is a very high standard to set. Further guidance would be welcomed on how CAA will interpret this in practise and how it would view and handle any minor omissions.</p>	<p>Comment Accepted: Appendix 2C has been re-drafted.</p> <p>Minor omissions would normally be subject to the CAA’s regulatory oversight process.</p>
54	General	Appendix 2C, Para 2.12.1	<p>This would indicate that the Aerodrome Authority is solely responsible for the programme of training that Business Partners operate as it does not highlight a specific area. Although the Aerodrome should ensure training standards are met through Operator Licences/Training Audits and Ramp Monitoring, it should not be expected to deliver a physical training plan.</p>	<p>Comment Partially Accepted: All personnel that operate on an aerodrome must have safety training or briefings appropriate to their role and location. This is consistent with Appendices 2E and 2F. To provide additional clarity reference to briefings has been added.</p>
55	General	Appendix 2C – Para 2	<p>Para 1.4 makes reference to the 4 components and 12 elements of the ICAO SMS framework. The layout of Para 2 is confusing and could be improved to split the 12 elements into the 4 components in line with ICAO eg.</p> <p>2.1 – <u>Safety Policy and Objectives</u> 2.2 2.1.1 – Management commitment and responsibility 2.3 2.1.2 – Safety Accountability Etc</p> <p>2.7 2.2 – <u>Safety Risk Management</u> Etc</p> <p>2.9 2.3 – <u>Safety Assurance</u> etc</p> <p>2.12 2.4 – <u>Safety Promotion</u> Etc</p> <p>With this numbering, Para 2. 14 should be a separate point and not listed as if it were one of the elements of an SMS (Renumbered Para 3).</p>	<p>Comment Accepted: Appendix 2C has been re-drafted.</p>

56	General	Appendix 2D Para 2.2	The use of runway ahead markings in addition to runway designators could be potentially confusing when located before CAT II/ III hold.	Commented Accepted. The CAA will include a note that the actual position of the Runway Ahead marking will depend on the aerodrome's particular circumstances and layout and should be decided in consultation with the aerodrome's Local Runway Safety Team, where appropriate.
57	General	App 2D, para 2.2	We are unsure how the proposed positions of the 'RUNWAY AHEAD' marking before the Cat II/III holding position and '21-03' prior to the Cat I holding position will work at aerodromes where it is the practice to use Cat II/III holding positions at all times, even when a Cat I holding position exists. We are in favour of both types of marking being co-located. BALPA's view is that 'RUNWAY AHEAD' signage should be used only at specific 'hotspots' identified by the local runway safety Team or equivalent.	Commented Accepted. The CAA will include a note that the actual position of the runway ahead marking will depend on the aerodrome's particular circumstances and layout and should be decided in consultation with the aerodrome's Local Runway Safety Team where appropriate.
58	General	Appendix 2D Para 2.2	The use of runway ahead markings in addition to runway designators could be potentially confusing when located before CAT II/ III hold.	Commented Accepted. The CAA will include a note that the actual position of the runway ahead marking will depend on the aerodrome's particular circumstances and layout and should be decided in consultation with the aerodrome's Local Runway Safety Team where appropriate.
59	General	App 2D, para 2.2	Large painted areas, such as 'RUNWAY AHEAD' on runways and taxiways should be non-slip, especially on RETs and other high speed exits.	Comment Noted: CAP 168, Chapter 7, Para 4.1.3 states "All markings on paved runways should have friction values not less than the friction assessment Minimum Friction Level for the surrounding runway. Markings on aprons and taxiways should be made with materials having similar wet friction qualities to those of the surrounding paved surfaces". No further action required.
60	General	App 2D, para 2.2	We welcome the addition of this guidance material.	Comment Noted.

61	General	App 2D para 2.2	As long as the wording remains “should be considered wherever....required” and it is not interpreted as “are required”. Otherwise these measures would have an economic impact on smaller aerodromes.	Comment Noted.
62	General	Appendix 2D, Para 2.2	Guidance should be provided on physical dimensions for Runway Ahead markings much like those shown for runway designators in Figure 7.30 (Ch 7). There is also no indication of the required location of the rwy ahead markings with relation to the runway designators when Fig 2D.1 is the scenario.	Comment Noted: The dimensions of markings are provided in Chapter 7, with the location as shown in Fig 2D.1. The CAA considers the detail to be sufficient. Such markings should be agreed with the Aerodrome Inspector.
63	General	Appendix 2C – Para 2.5	This refers to an “emergency response plan”. Whilst this ties in with ICAO document 9859 it conflicts with the 'Aerodrome Emergency Plan' (CAP 168 Chapter 9 refers) which, in turn complies with the Civil Contingencies Act. One example of such conflict is the requirement for the provision of Friends & Family Assistance Centres (detailed within the emergency response plan), whereas the Civil Contingencies Act sets this out as a responsibility of the Local Resilience Forum. In effect adopting the 'emergency response plan' could make aerodromes non-compliant with existing UK legislation. Also, the proposed amendment refers to planning for ' <i>return to normal ops</i> ' which is not included in chapter 9 nor does it include any guidance on what is required and how it is to be achieved. Therefore by the inclusion of these <i>four words</i> , a whole new section (with associated workload) would be required to be added to the existing Aerodrome Emergency Plan. The remainder of the new (Chapter 2) Appendix 2C is considered a welcome addition.	Comment Partially Accepted: Chapter 9 acknowledges that the guidance is drawn from both ICAO and the Civil Contingencies Act (CCA). It also acknowledges that within the UK devolved administrations there are different arrangements but all draw on common principles. One of these is that whatever requirements exist they must be developed with partner agencies through the local planning arrangements. Another principle is that an incident passes through phases from initial response to recovery and return to normal operations. The emergency response phase leads to the return phase and both should be seamless. Chapter 9, section 2 does refer to national guidance and should ensure that there is not a conflict. A cross-reference to Chapter 9 will be added.
64	General	Appendix 2C, para 2.5	The proposed amendment refers to planning for ' <i>return to normal ops</i> ' which is not included in chapter 9 nor does it include any guidance on what is required and how it is to be achieved.	Comment Not Accepted. Chapter 9 references the Civil Contingencies Act arrangements, which includes recovery arrangements. Guidance in the CCA is comprehensive on recovery.

65	General	Appendix 2C, para 2.6	The term “smaller and less complex aerodrome” needs further clarification and understanding of how applied in terms of scope.	Comment Accepted: Appendix 2C has been re-drafted.
66	General	Appendix 2C, para 2.6	“...safety management systems manual...” It is felt that it should be acceptable for all aerodromes, not just smaller and less complex aerodromes, to be able to incorporate the SMS documentation into the Aerodrome Manual. The introduction of a separate document will overly complicate matters and place additional workload on staff resources purely to separate the 2 issues where they currently exist in one manual.	Comment Accepted: Appendix 2C has been re-drafted.
67	General	Appendix 2C Paras 2.7.1 & 2.8	What is meant by “formal process”? If this intended to mean an “effective” process then use that word. If not, an explanation of what constitutes a “formal process” is required.	Comment Accepted: Appendix 2C has been re-drafted.
68	General	Appendix 2C, paras 2.7.1 and 2.8	What is meant by “Formal Process”?	Comment Accepted: Appendix 2C has been re-drafted.
69	General	Appendix 2C Paras 2.7.1 & 2.8	What is meant by “formal process”? If this is intended to mean an “effective” or a “documented” system then this should be stated.	Comment Accepted: Appendix 2C has been re-drafted.
70	General	Appendix C, para 2.8	".....an acceptable level of safety". ‘Acceptable’ as defined by whom?	Comment Accepted: Appendix 2C has been re-drafted.
71	General	Appendix 2C, para 2.9.1	“.....and compared to agreed safety levels...” – Does this mean agreed locally at each aerodrome or does it refer to an agreement between the aerodrome and CAA?	Comment Accepted: Appendix 2C has been re-drafted.
72	General	Appendix 2C, Para 2.9.1	The reference to “agreed” safety levels and performance is confusing. It is suggested that “defined” is a preferable term to use.	Comment Accepted: Appendix 2C has been re-drafted.

73	General	Appendix 2C Para 2.9.1	The reference to “agreed” safety levels and performance is confusing. Agreed with whom – internally within the organisation, with CAA, with....? Is “defined” not a better word as it places clear responsibility on the aerodrome to define these? If agreement of such safety levels and performance with CAA is required then such a requirement should be stated.	Comment Accepted: Appendix 2C has been re-drafted.
74	General	Appendix 2C Para 2.12.1	The reference to “personnel” needs clarification. Is this the aerodrome’s own staff – assumed to be the case – or is the intent to make this remit much wider? Clarify please.	Comment Noted: The term ‘personnel’ refers to the aerodrome operator’s staff. Each organisation should ensure that their staff are trained and competent as part of their own SMS.
75	General	Appendix 2C, para 2.12.1	“Training and Education “...personnel...” Does this mean the Aerodrome Operator’s own staff, Airside Operations staff, 3 rd parties staff that work airside, or all staff?	Comment Noted: The term ‘personnel’ refers to the aerodrome operator’s staff. Each organisation should ensure that their staff are trained and competent as part of their own SMS.
76	General	Appendix 2C, Para 2.12.1 & 2.13.1	The references to “personnel” is ambiguous. Is training and safety communication applicable to both airport staff and other airfield users? It is assumed to be the former with relation to training however it is unclear with respect to the latter.	Comment Noted: The term ‘personnel’ refers to the aerodrome operator’s staff. Each organisation should ensure that their staff are trained and competent as part of their own SMS..
77	General	Appendix 2C Para 2.12.1	How is the term “personnel” defined. Does this mean and assumed - employees of the aerodrome authority - or is its intention to cover a wider base?	Comment Noted: The term ‘personnel’ refers to the aerodrome operator’s staff. Each organisation should ensure that their staff are trained and competent as part of their own SMS.

78	General	Appendix 2C, para 2.13	<p>“...ensure all personnel...explain why particular safety actions are taken...safety procedures are introduced...”</p> <p>Is it really necessary to do this for all staff? See response to 2.12.1 above - the same question applies here too. The reasons behind specific safety actions and safety procedures can be far less important than the procedures themselves if these are to be explained to all staff.</p>	<p>Comment Noted: The term ‘personnel’ refers to the aerodrome operators staff; the aerodrome operator is also required to ensure adequate oversight of third party operators on the aerodrome, so the scope of personnel extends beyond those employed by the aerodrome operator.</p> <p>In many cases the communication of safety information is already cascaded to personnel, via existing communication channels, such as OSIs, MDI etc.</p>
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CAP 168 – Chapter 3

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
79	General	Para 3.6.2	This is good and allows for a more flexible runway design.	Comments Noted.
80	General	Para 3.7.3	The final sentence of this paragraph requires review. The AACG 2002 Common Agreement allows for use of non-paved outer shoulders for A380 operations if agreed between national regulator and an individual aerodrome operator. CAP 168 should reflect this and as SRG were signatories to AACG that position should be stated clearly.	Comment Noted. The interim requirements for A380 operations, derived from the work of the AACG, were published in NOTAL 2/2003, which aimed to facilitate A380 operations where the ability to upgrade to code F in the short term was deemed to be prohibitively costly and disruptive. The A380 requirements and operations have been in place for several years, and the CAA deems that interim requirements are no longer necessary. Deviation from licensing requirements is addressed in CAP 168, paragraph 4 of the Introduction and Chapter 1.
81	General	Para 3.7.3	Changes are not applicable to HIAL airports.	Comment Noted.
82	General	Para 3.7.3	The term 'normally' is ambiguous and implies that in some circumstances unpaved shoulders may be acceptable. A suitable definition of acceptable circumstances should be added (eg. where suitable mitigation has been agreed with ASD)..	Comment Noted: The syntax " normally " is used extensively throughout CAP 168, and means 'where practicable, under normal circumstances', thus providing for variations or differences, due to operational limitations or certain circumstances, which are agreed between CAA and the aerodrome operator or licence holder.
83	General	Paras 7.7.1 & 7.7.2	No comments.	Comment Noted.
84	General	Para 11.3.1.2	No comments.	Comment Noted.

CAP 168 – Chapter 4

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
85	General	Para 4.2	This may affect smaller aerodromes particularly where the glide slope angles are specifically set to avoid obstacles.	Comment Noted.
86	General	Para 9.3.1	This is good and clarifies CAA position.	Comment Noted.

CAP 168 – Chapter 6

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
87	General	Para 1.1.3	No comments	Comment Noted
88	General	Para 1.1.3	<p>The removal of the stipulation that a wind sleeve was necessary where public transport takes place at night is significant. Our windsock is nearly 200 metres away from the nearest source of electricity. If it was required to be illuminated we would have to dig a 200m trench and lay 200m of cable and install a lighting system. This would run into many thousands of pounds. For decades past wind information has been passed to pilots satisfactorily by radio. It seems to me that this expense is unnecessary and unjustified. The proviso where public transport takes place at night should be retained.</p>	<p>Comment Noted: The CAA adopts the Standards and Recommended Practices (SARPS) contained within Annex 14 Vol 1 (Aerodrome Design and Operations). Chapter 5, Para 5.1.15 of Annex 14 recommends that: “Provision should be made for illuminating at least one wind indicator at an aerodrome intended for use at night”.</p> <p>The CAA considers the provision of an illuminated wind direction indicator to provide an added safety benefit to pilots, whether in-command or under instruction/supervision.</p> <p>The CAA is aware of recent technological enhancements and innovations (i.e. LED, Solar and Battery powered lighting) for the provision of illuminated wind direction indicators, such that the installation and running costs to provide illumination has reduced considerably. Noting that, the CAA has consequently withdrawn the prescriptive design and performance requirements (to provide illuminated windsleeves).</p>

89	General	Para 1.1.3	<p>This is a matter of concern to many smaller aerodromes. If the requirement to illuminate wind sleeves only at aerodromes which have scheduled public transport operations is removed and thereby making illumination a requirement at all aerodromes this will potentially involve some smaller aerodromes in significant cost e.g. cable running over significant distances. Many smaller aerodromes have successfully passed wind information by radio over many years and as such a requirement to illuminate wind sleeves appears unjustified.</p>	<p>Comment Noted: See CAA response to comment above.</p> <p>For clarification, the requirement is to provide an illuminated wind direction indicator, at aerodromes licensed for night use – therefore this does not apply to <i>all</i> aerodromes.</p>
90	General	Para 5.7.1	<p>Which “available distance” is being referred to in this amendment. Is it TORA/ASDA or TORA/LDA? The rationale states TORA/ASDA but the text refers to TORA/LDA. This is inconsistent.</p> <p>Clarification is required on how this amendment would affect factors like starter strips, stopways, clearways, displaced thresholds and areas of hard surface unfit for aircraft use but forming part of the “runway”. Also how will this amendment apply to aerodromes operating without red centreline lights to the end of the paved surface?</p>	<p>Comment Accepted: The rationale should read “TORA/LDA” and the text will be revised. The requirement has been introduced to take account of where the declared distances do not coincide with the end of runway and the red lights that mark it. The issue is how to deal with the lighting from the end of the 900m RCLL to this further point, with a pragmatic solution being to continue with red centreline lights to infill the gap.</p>
91	General	Para 5.7.1	<p>This could be confusing when there are differing positions for LDA and TORA on a runway. Examples of how this is to be applied would be useful.</p>	<p>Comment Noted: The rationale should read “TORA/LDA” and the text will be revised. The requirement has been introduced to take account of where the declared distances do not coincide with the end of runway and the red lights that mark it. The issue is how to deal with the lighting from the end of the 900m RCLL to this further point, with a pragmatic solution being to continue with red centreline lights to infill the gap.</p>

92	General	Para 5.7.1	<p>The proposed text for para 5.7.1 seems to suggest the colour coded centreline (reds) should extend to the runway end where this is beyond the end of LDA/TORA (though TORA/ASDA is mentioned in the rationale.) Either way it sounds wrong, there will be a red Runway End Bar at the end of TORA/LDA, denoting the end of the available runway, so why would you want to entice pilots through these reds into a Stopway or starter extension? The red Runway End Bar is the end of the runway, it is assumed that this refers to the end of the pavement, when describing the runway end, but this has no relevance to a departing or arriving pilot unless it's declared as Stopway, when it's lit accordingly.</p> <p>5.7.1 – Request clarification of how this amendment affects various scenarios, e.g. starter strips, stopways, clearways made up of hard surfaces, areas of hard surface deemed unfit for aircraft use but forming part of 'runway', displaced thresholds etc., position of taxiways, RETs and RATs etc.</p> <p>Also, when is this amendment considered applicable to aerodromes operating without red c/l lights to the end of the 'hard surface'?</p> <p>If the TORA/TODA ceases before the physical end of the runway the proposal as described seems counter-intuitive.</p>	<p>Comment Accepted: The rationale should read "TORA/LDA" and the text will be revised. The requirement has been introduced to take account of where the declared distances do not coincide with the end of runway and the red lights that mark it. The issue is how to deal with the lighting from the end of the 900m RCLL to this further point, with pragmatic solution being to continue with red centreline lights to infill the gap.</p>
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CAP 168 – Chapter 7

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
93	General	Para 2.3.4	No comments	Comment Noted.
94	General	Para 2.3.4	Is there an official definition of 'Glare'.	Comment Noted: The CAA does not provide an official definition of glare. Reports from pilots reporting glare from AGL may be all that needs to be considered in this respect.

95	General	Para 2.3.4	<p>The removal of the stipulation that a wind sleeve was necessary where public transport takes place at night is significant. Our windsock is nearly 200 metres away from the nearest source of electricity. If it was required to be illuminated we would have to dig a 200m trench and lay 200m of cable and install a lighting system. This would run into many thousands of pounds. For decades past wind information has been passed to pilots satisfactorily by radio. It seems to me that this expense is unnecessary and unjustified. The proviso where public transport takes place at night should be retained.</p>	<p>Comment Noted: The CAA adopts the Standards and Recommended Practices (SARPS) contained within Annex 14 Vol 1 (Aerodrome Design and Operations). Chapter 5, Para 5.1.15 of Annex 14 recommends that: “Provision should be made for illuminating at least one wind indicator at an aerodrome intended for use at night”.</p> <p>The CAA is cognisant of this recommendation, and in preparation for EASA Aerodrome Regulation, is seeking to remove, as far as is practicable, differences to Annex 14 (on which EASA regulations might be based).</p> <p>The CAA is aware of recent technological enhancements and innovations (i.e. LED, Solar and battery powered lighting) for the provision of illuminated wind direction indicators, such that the installation and running costs to provide illumination has reduced. Noting that the CAA has also withdrawn prescriptive design and performance requirements (for illumination). Overall, the CAA considers the provision of an illuminated wind direction indicator to provide an added safety benefit to pilots, whether in-command or under instruction/supervision.</p> <p>No further action required.</p>
96	General	---	<p>Figure 7.29 is not in colour for some reason.</p>	<p>Comment Noted: Not all figures are reproduced in colour. This graphic is reproduced courtesy of ICAO, and was not able to be reproduced in colour.</p>

CAP 168 – Chapter 8

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
97	General	Para 6.9	This should not apply to Cat Special aerodromes. At Cat Special aerodromes the RFFS responders are not analogous to the national incident command system. Also, the staff are part-time and do not have their own equipment but have to share so it is not possible to permanently attach some kind of tabard. The essential thing is that they should put on properly the protective clothing and respond asap. It would be time consuming also to put on an additional tabard. And they should not put flammable clothing on over their protective clothing.	Noted. This Chapter 8 does not apply to Category Special aerodromes. The requirements for them are set out in NOTAL 2008/04.
98	General	Para 6.9	Remove proposed sentence and reference to coloured tunic or tabard. If the RFFS adopt the National Incident Command System they would be adopting the ICS tabard colour scheme.	Comment Noted: The guidance in the Fire Service Manual recognises that there is no national standard but illustrates some examples in common use. It is this lack of a standard that requires the RFFS Incident Commander to be identified.
99	General	Para 6.9	The Aerodrome RFFS Incident Commander and Sector Commanders should wear conspicuous tunics or tabards	Noted. In principle this is correct; however many RFFS units could not provide sector commanders due to limited numbers. The priority is seen as being to identify the aerodrome RFFS Incident Commander.
100	General	Para 6.9	There are so many conspicuous colour schemes throughout the emergency services should the Aerodrome RFFS agree a Nationally recognised colour scheme with the LFB	Noted. The comment highlights that there is no national scheme; therefore to be prescriptive for the RFFS would cause problems locally when dealing with other responders. The key requirement is to coordinate arrangements with other local emergency responders.

101	General	Para 6.9	Is not the NICS being reviewed at the present time? Would not it be prudent to consult, prior to publication of amendment	Noted. The Incident Command System is under constant review. The CAA and AOA RFF Working Group regularly consult with the authors. The intention is for the Information Paper IP-1 to be incorporated into the national manual in due course.
102	General	Para 6.9	The requirement for the Officer in Charge of the aerodrome RFFS at smaller aerodromes to wear a "conspicuous coloured tunic or tabard" is questioned.	Comment Not Accepted. It is important that at all incidents the RFFS Incident Commander is identified.

CAP 168 – General Comments

No.	Type of Comment (general, technical, editorial)	Part/Section/ Para/Sub-para	Comment	CAA Comment
103	General Comment	Other	Expense is important, whether it is new expenses or cumulative increases. Our aerodrome licence fee rose by 43% in 2008 and by another 65% in 2009. A new fee was introduced in 2008 in the form of the ANSP fee which rose by 109% in 2009. Yesterday I read a consultation saying that Ofcom wants to increase our aerodrome radio fee from £100 to £2600 p.a., and the small print of the consultation admitted that "...the impact on smaller airports becomes proportionately larger". Aerodromes cannot pass on all the increases that have been thrust upon them and are operating in a very difficult environment.	Comment Noted.
104	General	Other	There is an error in table 6A.1 in the notes section that states guidance for Follow Me beacons is found on diagram 6A.19, but is in fact at 6A.21.	Comment Noted: Action to correct to this reference shall be incorporated into the amendment.
105	General	Other	The 'pre-threshold' runway edge markings issue. Notal 2008/14 (issued 28.11.2008) states "To differentiate further between a starter extension and pre-threshold runway, runway edge markings for the pre-threshold runway are to be consistent with those of the post –threshold runway i.e solid white lines". This conflicts with detail currently contained in Chapter 7 Paragraph 4.2.4 and figure 7.23 (a). This NPA is an opportunity for the situation to be clarified.	Comment Noted: Figure 7.23 is designed to show how the starter extension should be marked, which distinguishes it from pre-threshold marking. Pre-threshold marking is merely an extension of the runway edge lines and, therefore, does not need to be shown on the same diagram, particularly as this may cause confusion when an aerodrome may make use of a starter extension.

106	General	Other	Unless there is a proven safety risk, we advocate proportionality and the avoidance of any expense at a time when small airfields are under grave economic pressure.	Comment Noted.
107	General	NOTAL 2008/14	<p>The details of if and how this NOTAL will be incorporated in CAP 168 are not specified in the NPA 02/2009. However if the original NOTAL is incorporated in toto we believe this could cause a significant flight safety hazard. The NOTAL specifies that full width pavement before the runway threshold that may be used for departures shall be marked with solid edge lines. This could cause (possibly inexperienced) pilots to perceive that this is part of the runway available for landing causing them to descend below the approach path and collide with a near in obstruction which is the reason for the displaced threshold.</p> <p>The current markings shown in CAP 168 specify that the edge lines under these circumstances are dashed and thus clearly differentiate between the landing area and pre-threshold runway. Such mis perceptions can occur as is demonstrated by an article in the latest edition of GASIL where a pilot misinterpreted runway lights and touched down short of the threshold. Many airports in the UK use the existing markings including Birmingham International so why change an established practice and add a possible accident risk? I have repeatedly requested a copy of the risk analysis completed by CAA SRG before the publication of NOTAL 2008/14 but if it exists it has not been made available.</p>	<p>Comment Noted: The change was introduced to define the dimensions of a starter extension and to illustrate how it differs from pre-threshold runway in terms of length, width and strip protection. Additionally, ICAO Annex 14 recommends that the edge of the pre-threshold runway be defined as shown. Therefore, runway edge lines should be included if that part of the runway is included in the TORA or ASDA. Should the area not be suitable for use, it is marked with crosses and does not have the runway edge lines. The question on whether an aerodrome needs to mark the edge of the runway is described in CAP 168 Para 4.2.2.</p>