EASA

Comment Response Tool

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Title	Development of Acceptable Means of Compliance and Guidance Material for the implementation and measurement of Safety Key Performance Indicators (SKPIs) (ATM performance IR)
NPA Number	NPA 2011-18

UK CAA (European.Affairs@caa.co.uk) has placed **7** unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachm
18	(General Comments)	0	**Page No:** N/A **Paragraph No:** General **Comment:** Notwithstanding the similarities of the proposed questionnaires, with the EUROCONTROL Safety Maturity Survey Framework and the assertion from EASA that these changes are a 'modest approach' (para 68), no Regulatory Impact Assessment has been conducted and insufficient time has been granted to states to conduct a full appraisal of the proposals. There is likely to be significant regulatory burden imposed on NSAs by these changes, especially if the scope is widened to units with 50,000 commercial air traffic movements per year, and there may yet be unforeseen difficulties with both the questionnaires, particularly the new NSA element and the RAT methodology. It is therefore essential that the EC and EASA remain receptive to proposals to amend, modify or evolve the questionnaires and KPIs in the light of experience that will be gained during RP1 and the UK CAA wishes to continue to work with and support EASA on this matter **Justification:** Short period for consultation, no RIA and immature state of the NSA questionnaire.	
19	A. Explanatory Note — IV. Content of the draft Decision — a) Background and regulatory framework	5 - 7	**Page No:** 6 **Paragraph No:** 13 **Comment:** There is some confusion arising here due to the proposed amendment of Regulation 691/2010 regarding traffic levels. Do the KPIs apply to units with more than 50,000 or 150,000 movements per annum? **Justification:** It is necessary to know as soon as possible the scope of what units the regulation applies to.	
20	A. Explanatory Note — IV. Content of the draft Decision — a) Background and	5 - 7	**Page No:** 7 **Paragraph No:** 21 **Comment:** The CAA supports this paragraph in the light of the limited consultation period and accepts that the RAT methodology should be GM.	

Cmt	Segment description	Pag	Comment	Attachm
	regulatory framework			
21	A. Explanatory Note — IV. Content of the draft Decision — b) Content of AMC/GM — ii. Effectiveness of Safety Management (EoSM) (36)	10 - 11	**Page No:** 10 **Paragraph No:** 36 **Comment:** We recommend that the original ICAO based statement should stand as we have not had sight of CANSO's submission which leads to an inconsistency with ICAO. **Justification:** Inconsistency with ICAO	
22	A. Explanatory Note — IV. Content of the draft Decision — b) Content of AMC/GM — iii. Severity classification based on the Risk Analysis Tool Methodology	11	**Page No:** General Comment **Paragraph No:** 47 illustrates **Comment:** The AMC, GM and regulation numbering should be aligned in common with other EASA regulations. **Justification:** To align with other EASA documentation and ease of reference.	
23	A. Explanatory Note — IV. Content of the draft Decision — b) Content of AMC/GM — iii. Severity classification based on the Risk Analysis Tool Methodology (60)	13 - 14	**Page No:** 14 **Paragraph No:** 66 **Comment:** Ambiguity in this paragraph. Should the statement require **all incidents** to be verified, rather than **a sample**, then this could impose an unacceptable burden on NSAs as detailed in the UK CAA's main comment above. Clarification of the meaning of this paragraph is required. **Justification:** Verification of all incidents would create a significant regulatory burden. The UK CAA processes in the order of 14-15,000 mandatory occurrence reports a year.	
24	B. Draft Annex (v0.4) AMC & GM SKPIs — III Severity Classification Based on the Risk Analysis Tool Methodology — AMC 7 SKPI — Severity Classification Based on the Risk Analysis Tool Methodology —	48 - 49	**Page No:** 48 **Paragraph No:** D **Comment:** The concept of the RAT appears sound; however there are concerns that the level of data required to answer the RAT questions might not be available for many occurrences that come within the scope of the Regulation. This will result in low 'Reliability Factor' scores, in which case the relevant AMC material instructs the occurrences to be categorised as 'Not Determined', regardless of the severity indicated by the application of the RAT methodology. The concern is that there could be a high proportion of occurrences categorised as 'Not Determined', which would have limited usefulness for analysis purposes. Experience gained throughout RP1 will show what proportion of relevant occurrences are	

Cmt	Segment description	Pag	Comment	Attachm
	Methodology for Separation Minima Infringements — D. Reliability Factor		categorised as 'Not Determined' and the results could then inform future 'goals' to improve data collection/quality. **Justification:** There could be a high proportion of occurrences categorised as 'Not Determined'.	

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