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Title	Requirements for apron management services at aerodromes
NPA Number	NPA 2013-24

UK CAA (European.Affairs@caa.co.uk) has placed 8 unique comments on this NPA:

Cmt	Segment description	Page	Comment	Attachme
478	(General Comments)	0	Page No: N/A	
			Paragraph No: General	
			Comment: In several places the draft IRs place responsibilities onto the aerodrome operator. At smaller aerodromes these might be carried out directly by the aerodrome operator. However, at larger aerodromes these are routinely carried out by the apron management service provider (AMSP) or another organisation (e.g. handling agent (H/A)). In this case the aerodrome operator sets policies and oversees the AMSP/HA to ensure continuing satisfactory performance.	
			Examples include:	
			 ADR.OPS.D.015 Management of aircraft movement on the apron ADR.OPS.D.050 Aircraft stand allocation ADR.OPS.D.060 Aircraft parking ADR.OPS.D.065 Aircraft departure 	
			Because such tasks would normally be delegated or contracted by the aerodrome operator, attention should be drawn to Recital 8 of the Aerodrome Regulation (Regulation 139/2014), included below:	
			"Specific services referred to in subpart B of Annex IV (Part ADR.OPS) should be provided at an aerodrome. In some cases these services are not directly provided by the aerodrome operator, but by another organisation or State entity, or combination of both. In such cases the aerodrome operator, being responsible for the operation of the aerodrome, should have arrangements and interfaces with these organisations or entities in place to ensure the provision of services according to the requirements stated in Annex IV. When such arrangements and interfaces are in place the aerodrome operator should be considered as having discharged their responsibility and should not be understood to be directly responsible or liable for any noncompliances by another entity involved in the arrangement, provided that it has complied with all applicable requirements and obligations laid down in this Regulation relevant to its responsibility under the arrangement".	

The applicability of this should be extended to include the specific services referred to in Subpart D, to ensure a consistent approach to the AMS activities not directly carried out by the aerodrome operator. Therefore, when the aerodrome regulation is amended to include apron management services, the reference to specific services contained in subpart D should be included.

Justification: Consistency and clarity for the aerodrome operator and Competent Authorities responsible for oversight.

Proposed Text: "Specific services referred to in subparts B and D of Annex IV (Part ADR.OPS) should be provided at an aerodrome. In some cases these services are not directly provided by the aerodrome operator, but by another organisation or State entity, or combination of both. In such cases the aerodrome operator, being responsible for the operation of the aerodrome, should have arrangements and interfaces with these organisations or entities in place to ensure the provision of services according to the requirements stated in Annex IV. When such arrangements and interfaces are in place the aerodrome operator should be considered as having discharged their responsibility and should not be understood to be directly responsible or liable for any noncompliances by another entity involved in the arrangement, provided that it has complied with all applicable requirements and obligations laid down in this Regulation relevant to its responsibility under the arrangement".

479 3. Proposed amendments

— 3.1. Draft
Opinion —
ANNEX 1 —
Annex II —
SUBPART A —
GENERAL
REQUIREMENT
(ADR.AR.A)

ADR.AR.A.005 Competent Authority 12 **Page No:** 12

Paragraph No: ADR.AR.A.005 Competent Authority, sub-paragraph (b)

Comment: Sub-paragraph (b) places the oversight obligation onto two Competent Authorities (CAs). Oversight should remain with one CA, which should be the state where services are provided.

Justification: This would be consistent with the certification and designation requirements.

Proposed Text: "When an apron management services provider provides services in more than one Member State, the Competent Authorities Authority for oversight shall be the Competent Authority who issued the certificate or registered the declaration and the Competent Authority responsible for the oversight of aerodrome related activities in the Member State where the services are provided."

480 3. Proposed amendments

— 3.1. Draft Opinion —

5 **Page No**: 15

Paragraph No: Appendix 1 - AMS Certificate

	ANNEX 1 — Annex II — SUBPART C — OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ADR.AR.C) — APPENDIX I		Comment: This Appendix appears to suggest that either the state in which the apron management service provider (AMSP) resides or the state in which it is operating can issue the certificate. This could mean that a Competent Authority can give an organisational approval to an AMSP to operate at aerodromes in a different country. The UK suggests another state can approve an AMSP but not to operate at a specific airport outside its boundary, and that the Competent Authority should issue any certificate to operate at an aerodrome within its state should such a certificate be required. This is consistent with the two-certificate principle in the Aerodrome Regulation (139/2014). It may be that it would be better that the Certificate be changed to remove the reference to a specific aerodrome. Some clarification is required about who conducts the oversight – this could be achieved by AMC or GM detailing the responsibilities for the Competent Authorities (as well as for organisations at the aerodrome). Justification: The CA in the state which the AMSP operates should be the authoriser and overseer.	
481	3. Proposed amendments — 3.1. Draft Opinion — ANNEX 1 — Annex III — SUBPART A — GENERAL REQUIREMENT (ADR.OR.A) — ADR.OR.A.010 Competent Authority		Page No: 16 Paragraph No: ADR.OR.A.010 Competent Authority, sub-paragraphs (a) and (b) Comment: UK CAA suggests these paragraphs create potential conflict for oversight responsibility between two Competent Authorities. It is suggested that guidance material is needed to indicate the scope and level of oversight that each Competent Authority is expected to undertake. (UK CAA comment against Appendix 1 on page 15 also refers)	
482	3. Proposed amendments — 3.1. Draft Opinion — ANNEX 1 — ANNEX 1 — SUBPART F — OPERATIONS MANUAL AND DOCUMENTATI OF PROVIDER OF APRON MANAGEMENT SERVICES — ADR.OR.F.005 Operations Manual	23 - 24	Page No: 23 Paragraph No: ADR.OR.F.005 Operations Manual Comment: It is assumed that when the Aerodrome Operator has direct responsibility for Apron Management, the Aerodrome Manual is seen to cover the requirements of this article. Justification: It would add additional burden on the Aerodrome Operator, for no identifiable gain, if they are required to develop a separate Operations Manual over and above the Aerodrome Manual. It is assumed that the Aerodrome Manual would be updated with the appropriate material to cover the additional requirements described in this NPA.	
483	3. Proposed amendments — 3.1. Draft Opinion — ANNEX 1 —	25	Page No: 25 Paragraph No: ADR.OPS.D.015 Management of aircraft movement on the apron	

	Annex IV — Part Operations Requirements — Aerodromes (Part ADR.OPS) — SUBPART D — APRON MANAGEMENT SERVICES (ADR.OPS.D) — ADR.OPS.D.01 Management of aircraft movement on the apron		Comment: The text should also include prevention of collision with vehicles or persons. Justification: Consistency with Commission Regulation (EU) No. 923/2012 SERA.3210(d)(4). Proposed Text: "The aerodrome operator shall ensure that means and procedures are in place for the management of aircraft movement on the apron, to prevent collisions between aircraft, and between aircraft, obstacles, vehicles and persons."	
484	3. Proposed amendments — 3.1. Draft Opinion — ANNEX 1 — Annex IV — Part Operations Requirements — Aerodromes (Part ADR.OPS) — SUBPART D — APRON MANAGEMENT SERVICES (ADR.OPS.D) — ADR.OPS.D.040 Right of way on the apron	25	Page No: 25 Paragraph No: ADR.OPS.D.040 Right of way on the apron Comment: The text should be reviewed in the light of the SERA regulation. Justification: To ensure consistency with Commission Regulation (EU) No. 923/2012 SERA.3210(d)(4)(iv). Proposed Text: Replace current text with the following: "(a) Emergency vehicles proceeding to the assistance of an aircraft in distress shall be afforded priority over all other surface movement traffic. (b) Subject to the provisions in (a), vehicles on the apron shall be required to comply with the following rules: (1) vehicles shall give way to aircraft which are taxiing or being towed; (2) vehicles shall give way to other vehicles towing aircraft; (3) vehicles shall give way to other vehicles in accordance with the rules established by the aerodrome operator; (4) notwithstanding the provisions of (1), (2) and (3), vehicles and vehicles towing aircraft shall comply with instructions issued by the aerodrome control tower."	
485	3. Proposed amendments — 3.1. Draft Opinion — ANNEX 1 — Annex IV — Part Operations Requirements — Aerodromes (Part ADR.OPS) — SUBPART D — APRON	25	Page No: 25 Paragraph No: ADR.OPS.D.045 Management of apron safety Comment: This paragraph would be more appropriately placed as ADR.OPS.D.015, with current ADR.OPS.D.015 moved to ADR.OPS.D.040 and renumbered accordingly. Supporting AMC and GM would also need to be renumbered. Justification: To provide a more logical running order.	

MANAGEMENT	
SERVICES	
(ADR.OPS.D)	
-	
ADR.OPS.D.04	
Management	
of apron	
safety	

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