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Title	Rescue and Firefighting Services (RFFS) at aerodromes
NPA Number	NPA 2015-09

UK CAA (European.Affairs@caa.co.uk) has placed **15** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
48	3. Proposed amendments - GM1 ADR.OPS.B.010(a) Rescue and firefighting services	7	<p>Page No: 7</p> <p>Paragraph No: GM1 ADR.OPS.B.010(a)(1)</p> <p>Comment: Additional text is recommended after the word "aid" to align with ICAO Annex 14 paragraph 9.2 General – Introductory Note, as shown below</p> <p>Justification: Consistency with ICAO SARP</p> <p>Proposed Text: After the word 'aid' add:</p> <p><i>"The rescue may require the use of equipment and personnel other than those assessed primarily for rescue and firefighting purposes"</i></p>	
49	3. Proposed amendments - AMC2 ADR.OPS.B.010(a) Rescue and firefighting services	7 - 9	<p>Page No: 7</p> <p>Paragraph No: AMC2 ADR.OPS.B.010(a)(2)</p> <p>Comment" UK CAA does not support remission in the context of aircraft being used for the public transportation of passengers.</p> <p>Justification: The UK CAA has adopted this position because it recognises that the level of RFFS at an aerodrome is based on media and equipment related to the dimensions of the aircraft (critical area), whilst the minimum number of RFFS personnel at an aerodrome is based on a critical analysis of firefighting and rescue requirements in a credible worst case scenario (Task and Resource Analysis). Both these concepts are based on detailed, justifiable analysis. It appears illogical to then further reduce the RFFS level of protection on the basis of an arbitrary number of movements of the reference aircraft and which offers no safety benefit. Whilst we acknowledge that EASA has an intention to align, wherever possible, to ICAO SARPS, UK CAA recommends that EASA establishes communication with ICAO to remove remission in the context of aircraft being used for the public transportation of passengers, in the future.</p>	
50	3. Proposed amendments - AMC2 ADR.OPS.B.010(a) Rescue and firefighting services	7 - 9	<p>Page No: 7</p> <p>Paragraph No: AMC2 ADR.OPS.B.010(a)(2)</p> <p>Comment: Notwithstanding the UK CAA's previous comment on AMC2 ADR.OPS.B.010(a)(2), it is suggested that EASA should include a definition of remission at the start of this section. If the suggested definition is accepted, the terms 'Remission' and 'Remission Factor' should be used more frequently in appropriate areas of the AMC and GM.</p>	

			<p>as proposed below. Justification: The term ‘remission’ is currently only used once within the NPA (see NPA page 12 – Example 3). Including a definition, and using the terms ‘remission’ and ‘remission factor’ more widely in appropriate areas of the AMC and GM will create consistency of understanding, and eliminate misapplication of RFFS category reduction.</p> <p>Proposed Text: Add the following definition at the start of section AMC2 ADR.OPS.B.010(a)(2):</p> <p><i>“Remission – In the context of RFFS, ‘remission’ is defined as a risk based re-calculation of the minimum scale of RFFS services provided at an aerodrome for a particular aircraft movement, when compared to the minimum scale of RFFS that would normally be required in respect of the same aircraft when being used for passenger transportation. ‘Remission’ can be applied to other aeroplane operations (e.g. all cargo, mail, ferry, training, test and end of life aeroplane operations including those carrying dangerous goods) where the persons on board are limited in number, and/or located in known areas of the aircraft, or to aircraft where the number of movements (take off-or landing) is relatively low. Where ‘Remission’ is applied a ‘Remission Factor’ will determine the degree of reduction in the scale of RFFS and is normally expressed as a number of categories.”</i></p>	
51	3. Proposed amendments - AMC2 ADR.OPS.B.010(a) Rescue and firefighting services	7 - 9	<p>Page No: 7</p> <p>Paragraph No: AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (a)(1)</p> <p>Comment: In the context of passenger transportation, the current text and worked examples make it clear that remission can only be applied against the largest aircraft expected to use the aerodrome (i.e. remission can only be taken advantage of once in this context). However, it is not made clear whether the application of remission to passenger transportation flights, and ‘other’ types of flight, should be considered separately. e.g. a Category 10 passenger flight could operate at a Category 9 aerodrome (depending on number of movements), however the same aerodrome could also accept a Category 10 cargo aircraft by providing Category 7 (as per table 2).</p> <p>EASA are requested to provide clarification regarding the above.</p> <p>Justification: To provide flexibility for aerodrome operators where there is a mixture of aircraft movement types.</p>	
52	3. Proposed amendments - AMC2 ADR.OPS.B.010(a) Rescue and firefighting services	7 - 9	<p>Page No: 7-8</p> <p>Paragraph No: AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (a)(2)</p> <p>Comment: UK CAA has reviewed the NPA regarding RFFS ‘remission’, and the calculation of RFFS category taking into account the 700 movements (as proposed in AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (a)(2)) We have identified 2 differing interpretations relating to the practical application of this AMC as follows:</p> <p>- Interpretation 1 The one category reduction can only be applied during the busiest consecutive 3 months that were used to calculate the aerodrome’s RFFS category. In practice this would mean that, if the aerodrome’s busiest consecutive 3 months are June, July, and</p>	

			<p>August, and within this period they are expecting 690 Cat 7 movements, they can accept these movements whilst providing RFFS Category 6. However, if the Category 7 movements continue after the 3 month period, from the first day of the following month (September) the aerodrome would have to provide Category 7. In summary, this interpretation indicates that remission can only be applied during the busiest consecutive three months.</p> <p>-</p> <p>Interpretation 2 – The 700 movements in the busiest consecutive 3 months is a method for calculating the aerodrome’s RFFS category and the one category reduction can be applied continuously until there is a change to the expected number of aircraft movements in the highest category. In practice this would mean that, if the aerodrome’s busiest consecutive 3 months are June, July, and August, and within this period they are expecting 690 Cat 7 movements, they can accept these movements whilst providing RFFS Category 6. If the Category 7 movements continue after the 3 month period (i.e. September onwards), they can continue to accept them whilst providing RFFS Category 6, but the aerodrome should continue to monitor the expected number of movements* in order to remove remission if they go above 700 in the busiest consecutive three months, or the aerodrome expects movements by larger aircraft (e.g. Category 8). In summary, this interpretation indicates that remission, once calculated (based on the busiest consecutive three months), can be continuously applied throughout the other months of the year or until the number of movements, or size of the largest aircraft, changes.</p> <p>* See also UK CAA comments regarding AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (d).</p> <p>EASA are requested to confirm which is the correct interpretation and that this should then be built in to AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (a) (2).</p> <p>Justification: To ensure clarity and consistency of understanding/application of remission.</p>	
53	3. Proposed amendments - AMC2 ADR.OPS.B.010(a) Rescue and firefighting services	7 - 9	<p>Page No: 8</p> <p>Paragraph No: AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (c)</p> <p>Comment: The examples of aircraft movement types do not include ‘positioning aircraft’. It is suggested that EASA should add ‘positioning flights’ in line 2 of the paragraph and provide a definition of ‘Ferry’ and ‘positioning flights’.</p> <p>Justification: To include a type of aircraft flight that frequently generates questions regarding the provision of RFFS.</p>	
54	3. Proposed amendments - AMC2 ADR.OPS.B.010(a) Rescue and firefighting services	7 - 9	<p>Page No: 8</p> <p>Paragraph No: AMC2 ADR.OPS.B.010(a)(2) Table 2</p> <p>Comment: There appears to be is an inconsistency between the way that remission is applied for passenger transportation flights, and for other flights (e.g. all-cargo, training etc) this is most evident at the lower categories (1 – 5). For example, if an aerodrome has less than 700 Category 5 passenger transportation movements in the busiest consecutive 3 months, it could accept the flight whilst providing RFFS Category 4. If the aircraft were an all-cargo flight (or other), if the guidance in Table 2 were followed, it would have to</p>	

			<p>provide Category 5.</p> <p>Justification: To resolve an inconsistency where a greater level of RFFS could be required for aircraft with very low numbers of people onboard.</p>	
55	3. Proposed amendments - AMC2 ADR.OPS.B.010(a) Rescue and firefighting services	7 - 9	<p>Page No: 8-9</p> <p>Paragraph No: AMC2 ADR.OPS.B.010(a)(2) sub-paragraph (d)</p> <p>Comment: It is recommended that the change proposed below is made in order to avoid overburdening an aerodrome, and to allow a decision on how frequently monitoring and forecasting should take place to be based on aerodrome circumstances.</p> <p>Justification: It is considered that requiring an aerodrome to monitor and forecast aircraft movements at least every 6 months is unnecessarily burdensome.</p> <p>Proposed Text: – Amend sub-paragraph (d) as follows:</p> <p>“The aerodrome operator, in order to assess that the rescue and firefighting services level of protection to be provided at the aerodrome is appropriate to the aerodrome rescue and firefighting category, should, at least once every six months, periodically monitor and forecast the aeroplane traffic expected to operate at the aerodrome. for the next twelve month period. In doing so, the aerodrome operator may use all information available from aeroplane operators as well as statistics of aeroplane movements during the year preceding the day of review.”</p>	
56	3. Proposed amendments - AMC4 ADR.OPS.B.010(a) Rescue and firefighting services	9 - 10	<p>Page No: 10</p> <p>Paragraph No: AMC4 ADR.OPS.B.010(a)(2) sub-paragraphs (oa) and (ob)</p> <p>Comment: It is recommended that the word ‘computed’ is removed.</p> <p>Justification: To avoid introducing a new word (and therefore confusion) that has not been used elsewhere and is not considered necessary.</p>	
57	3. Proposed amendments - AMC4 ADR.OPS.B.010(a) Rescue and firefighting services	9 - 10	<p>Page No: 10</p> <p>Paragraph No: AMC4 ADR.OPS.B.010(a)(2) sub-paragraph (ob)</p> <p>Comment: It is recommended that sub-paragraph (ob) is amended to include examples of ‘other aircraft flight types’ that feature in paragraph AMC2 ADR.OPS.B.010(a)(2) paragraph (c)</p> <p>Justification: To improve the consistency of information contained in the text.</p>	
58	3. Proposed amendments - AMC5 ADR.OPS.B.010(a) Rescue and firefighting services	10	<p>Page No: 10</p> <p>Paragraph No: AMC5 ADR.OPS.B.010(a)(2)</p> <p>Comment : It is recommended that paragraph (a) is amended as proposed below</p> <p>Justification: To establish the exact start point from which ‘response time’ can be measured.</p>	

			<p>Proposed Text: Amend as follows:</p> <p>.</p> <p><i>“(a) rescue and firefighting service achieves a response time not exceeding three minutes with an operational objective of not exceeding two minutes from the time of the initial call to the rescue and firefighting services, to any point of each operational runway, in optimum visibility and surface conditions, and be in a position to apply foam at a rate of, at least, 50 % of the discharge rate specified in AMC4 ADR.OPS.B.010 Table 1”;</i></p>	
59	3. Proposed amendments - GM4 ADR.OPS.B.010(a) Rescue and firefighting services	10 - 11	<p>Page No: 10</p> <p>Paragraph No: GM4 ADR.OPS.B.010(a)(2) 1st paragraph</p> <p>Comment: It is recommended that the words ‘contingency plan’ be changed to ‘contingency arrangements’.</p> <p>Justification: To Promote actively putting in place contingencies.</p>	
60	3. Proposed amendments - GM4 ADR.OPS.B.010(a) Rescue and firefighting services	10 - 11	<p>Page No: 11</p> <p>Paragraph No: GM4 ADR.OPS.B.010(a)(2) sub-paragraph (e)</p> <p>Comment: Sub-paragraph “(e) ‘Etc’ should e removed.</p> <p>Justification: To correct a typographical error - this point adds no value</p>	
61	3. Proposed amendments - GM4 ADR.OPS.B.010(a) Rescue and firefighting services	10 - 11	<p>Page No: 11</p> <p>Paragraph No: GM4 ADR.OPS.B.010(a)(2) 2nd full paragraph</p> <p>Comment: In the paragraph starting ‘A temporary reduction...’ it is recommended that the words ‘in the same way’ are removed.</p> <p>Justification: Promulgating a reduction in resources that are not used to calculate the aircraft category is not a requirement but would be good practice. How it is promulgated should be decided by the aerodrome operator to meet local circumstances.</p>	
62	3. Proposed amendments - GM5A DR.OPS.B.010(a) Rescue and firefighting services	11 - 14	<p>Page No: 12</p> <p>Paragraph No: GM5 ADR.OPS.B.010(a)(2) Example 3</p> <p>Comment: In the subtitle ‘Example 3’ it is recommended that the words ‘in the busiest consecutive 3 months’ are added.</p> <p>Justification: To be clear what is meant by the heading ‘movements’ in each of the tables.</p> <p>Proposed Text: Amend to read:</p> <p>“Example 3 — Less than 700 movements (remission) in the busiest consecutive 3 months”</p>	