

Report SSCC meeting 2-2012

Cologne, 11 & 12 December 2012

- Review SSCC structure

EASA wants to ensure that all sectors of the European Industry and Professional Organisations are involved in rulemaking, and that the representing organisations organize an adequate feed-back process in their constituency by a communication tool; The scope of rulemaking activities has grown substantially: in the beginning only aircraft certification, first extension including licensing and certification (not only flight crew, but also engineering and maintenance) and second extension also air traffic management and aerodromes. Therefore the amount of interested organisations has also grown substantially and EASA needs them to advice on new rules.

But the size of the full SSCC should also remain workable, and thus the role of the (actually) 5 subcommittees will become more important (Flight Standards, Aerodromes, ATM, Design & Manufacturing, Engineering & Maintenance).

This will mirror the new working practices of the reorganised AGNA (former Member States committee) into RAG and different TAG's (overviewing regulatory group and technical working groups).

To have closer contacts with all parties involved in General Aviation, a new SSCC subcommittee will be started up dealing with all aspects in GA.

The new SSCC will be reduced to max 35 full members (actually around 45) and the subcommittees to 25 members. The SSCC itself will only deal with overview and "horizontal" tasks, assessing technical work prepared by different subcommittees and on cross links between different rulemaking areas.

ESAM has actually 1 full seat in the SSCC, and since we are the only pan-European Organisation dealing with aero-medical matters we will retain that seat. This position gives us the right to nominate experts in the different rulemaking groups where we think aero-medical specialists should be involved in (certification, human factors,...). This is very important to have an impact on rulemaking!!

The ESAM representative must be active in one subcommittee but has also the right to nominate a representative in each other subcommittee: actually I'm in the full SSCC but also in the Flight Standards and in the ATM subcommittee, and dr Walter Gaber from FRAPORT in Aerodromes, and it will be necessary to appoint another colleague in the new General Aviation subcommittee!

Because ESAM works in different subcommittees, we are already considered as working "horizontally" and this empowers our position in the full SSCC.

Therefore we are sure now that ESAM has an accredited position within the EASA rulemaking activities: it is upon us to play actively our role in all different rulemaking groups by sending the right experts to them!

- General Aviation

The EU Commission and EASA have published a working paper on a roadmap for simplification of regulation of general aviation which will lead to a GA Safety Strategy. The basis of the idea is that one size of rules does not fit all, and that for GA the safety rules can be less stringent than for other users such as airlines, or ATC providers.

- revised Rulemaking procedures

Based on : 1) programme (what), and 2) rule development (how), with the aim to simplify the whole system and improve performance;

-a new pre RIA (Rule Impact Assessment) template has been developed (necessary before starting any rulemaking activity), taking into account the complexity of the task, -and a new TOR (Terms of Reference) template has been developed, including the profile of drafting group members and planning beforehand the number of needed meetings.

There will be “concept papers” for consultation about controversial issues, the use of “optional technical consultation” with workshops and meetings between TAG’s and SSCC subcommittees on difficult issues, and more focused consultation in certain cases.

EASA is also fine-tuning the work instructions for outsourcing some rulemaking tasks to CAA’s and Industry, and wants to integrate Standardisation experts in Rulemaking as well as participation of Rulemaking staff to Standardisation visits, which may have an impact on amendments of rules.

The Rulemaking program 2013-2016 has been published on the EASA website since 4/9/12, and EASA expects about 25 pre-RIA’s before February 2013 with as result about 30 items for Rulemaking.

- implementation Aircrew Regulation

in 27 Member States + 3 EFTA members:

- 10 Member States have introduced conversion reports,
- 16 Member States have asked for derogations, 2 MS for exemptions
- 9 requests for Alternative Means of Compliance came from UK (6 MED and 3 FCL)

the Opinion about FTL (flight time limitations) for CAT (commercial air transport) was published on 1/10/12 and followed by a discussion in the EASA Committee; a workshop to prepare the Decision will be held in February, but half of the involved partners are pro, half against...

new tasks in 2013 will deal with passengers seating & debriefing, and CO detectors on piston engines powered aircraft

- update 2th extension (ATM and Aerodromes)

the NPA (Notice of Proposed Amendment) on licensing and medical certification of ATCO's has been published, and ESAM has the possibility to comment;

there is also a CDR (Comment Response Document) on Aerodrome Rules :

OR = Organisational Requirements, AR = Authority Requirements, and Operations Requirements,

And a draft Decision on Aerodrome Design Specification, a RMT (Rulemaking Task) on APRON (approach navigation devices), work on aerodrome equipments and an ATM performance scheme (runway excursions, near misses,...)

- Standardisation

will be more risk targeted, and under continuous monitoring, with focus on the competence of EASA inspectors, a flexible minimum size and giving pro-active information to NAA's ;

NAA Standardisation seminars/workshops will be introduced to come to a reduced level of inspections;

Issues relate often to the NAA or the Organisational aspects : high level Standardisation meetings will be started, not related to the individual's domain. Some States over-regulate which is impairing flexibility.

- communication platform

will be set up for SSCC members (not alternates), observers and all subcommittee members at the end of 2013 on CIRCA

- alternative means of compliance process

they must demonstrate compliance with the Rules, have no negative effect on safety and be transparent and supporting harmonisation

- operators must have prior approval of the CAA with full description of the AltMC

- the CAA has to have a system in place to evaluate compliance with the Rules (analysis of documentation, notification of the application, notification of EASA with documentation, information of Member States)

- CAA approval must be available to all organisations and persons, and notified to the Agency with full description and revisions, and compliance to the Rules

- EASA will involve Standardisation (risk based) and Rulemaking (new developments? new AMC ? to include in recurrent tasks ? simplified procedure for acceptance ?), will publish information in a database and in the quarterly review procedures, with identification of significant AltMC's
- internally EASA will nominate focal points (internal database, internal list of experts)
- externally EASA will create a dedicated mailbox (AltMoc@easa.eu) and pages on the website with information

- approval by one CAA does not mean automatic approval by another CAA, it will be case by case

Roland Vermeiren
ESAM representative
Full member of the SSCC
Subcommittee member in Flight Standards and ATM