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Change management process at EASA certified Aerodromes

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Document Approval

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1. REVISION HISTORY

Version	Date	Change
1	23 October 2017	Initial issue.
2	04 May 2018	Change in CA address.
3	25 June 2020	Updating of references and general revision of text to include specifics on all changes that require approval.

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2. INTRODUCTION

This document has been developed to provide guidance for Aerodrome Operators on procedures to be used to notify the Civil Aviation Directorate (TM-CAD) of changes at an EASA certified aerodrome, covering both infrastructure and management system changes. This guidance helps in ensuring that changes comply with the certification criteria and safety requirements.

Changes can be divided into four categories, as follows:

- a. Development of new or upgrade of existing infrastructure/equipment (major or minor).
- b. Alterations to existing infrastructure/equipment or physical characteristics.
- c. Upkeep of existing infrastructure/equipment which does not involve changes to integrity.
- d. Management System changes including of nominated persons, services, procedures, and policies.

3. REGULATORY REQUIREMENTS

An EASA certified aerodrome is governed by the Essential Requirements of Commission Regulation EU2018/1139 and its Implementing Rules EU139/2014. Upon receipt of its certificate, the aerodrome operator shall meet the criteria included in the Certification, Operator, and Operations Basis.

The Implementing Rules require that all changes to aerodrome facilities and those procedures and policies that have the potential to affect the aerodrome's certificate, need to be notified to TM-CAD.

Furthermore, this regulation stipulates that some changes require prior approval by TM-CAD, whilst others only require a notification. This document defines this process.

4. INTERRACTION WITH TM-CAD

For changes <u>requiring TM-CAD approval</u>, the aerodrome operator shall submit its request using the form ANSAU_ADR_001_CHNG which can be downloaded from the Authority's website. This should be submitted electronically by email to <u>stephen.j.muscat@transport.gov.mt</u>.

TM-CAD may require a meeting to be held wherein the aerodrome operator would be able to outline the planned changes for the better understanding of all those involved. It would be beneficial if supporting documentation is distributed well in advance of such briefings thus

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ensuring maximum benefit. Further meetings may be expected both whilst preparing for and during the change.

Changes that <u>do not require the approval of TM-CAD</u> shall be processed by the aerodrome operator in accordance with its change management procedures which have been approved by TM-CAD.

5. PROCESS FOR THE SUBMISSION OF CHANGES REQUIRING APPROVAL

Aerodrome operators are expected to comply with the requirements of ADR.OR.B.040 and the respective AMC/GM, which clearly define which changes require approval by the Competent Authority.

a. Changes to Certification Basis (Infrastructure/Equipment):

For changes to infrastructure, the process has been subdivided into three parts as follows:

Part 1: Application.

The proposal for change should be submitted to TM-CAD on the form ANSAU_ADR_001_CHNG.

In attachment there should be; a) an overview of the change; b) demonstration that the project design meets the regulatory requirements; c) a safety risk assessment, and d) scaled drawings or specifications, if applicable.

TM-CAD shall assess the submitted application and if satisfied that change meets regulatory requirements, it will issue an approval accordingly. It is important to note that following this approval, any subsequent changes to the submitted design proposal or any modifications whatsoever shall be notified to TM-CAD.

Part 2: Implementation.

Following receipt of approval for change, the Aerodrome operator shall develop and submit to TM-CAD a thorough project management plan, wherein there are detailed specifics of how it plans to administer the implementation in a safe and coordinated manner. Such a plan shall take into consideration at least the following:

i) Statement of the supervisory structure for the safety management and monitoring of works, including contact details of key duty personnel concerned, for both project and

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aerodrome management. This should include clear responsibilities, including the person with overall accountability for the development;

- ii) Airfield operating procedures during the development, including contingencies such as low visibility procedures;
- iii) Arrangements for liaison meetings/briefings between the aerodrome management and the contractors;
- iv) Appropriate plans and diagrams relating to the construction process;
- v) Control of contractors;
- vi) Day and night start, control and completion of work procedures;
- vii) Communications procedures between the aerodrome operating units and construction teams;
- viii) Method of working;
- ix) Plans of site and diagrams of works;
- x) Site access plan;
- xi) Site safeguarding and marking;
- xii) Weather minima that will affect the works;
- xiii) The general layout of the aerodrome including airside access points;
- xiv) The location and limits of works area;
- xv) The specific security access points to be used and the location and marking of the access routes to be used to reach airside sites;
- xvi) Methods of control and access for works sites within the Apron and Maneuvering Area including arrangements for crossing taxiways and runways (if applicable);
- xvii) The methods and equipment to be used for protecting, marking and lighting the boundaries of works sites and for protecting normal aerodrome operations in the vicinity of the site. Also, the requirement to control site lighting to prevent distraction of aircraft crews, drivers and ATC;
- xviii) The strict timing for setting up of work sites, the start of work, daily permitted working hours at the site and procedures to be followed for starting and stopping work;
- xix) Aerodrome emergency procedures, including response times during periods of WIP, should not be compromised;
- xx) Vehicle and equipment requirements, operating rules and the requirements for staff discipline;
- xxi) Calculating and communicating amended runway declared distances;
- xxii) Maintaining appropriate pavement friction characteristics;
- xxiii) Information on special safety requirements for aircraft operations in the vicinity of works and the methods of control available on the maneuvering area, including R/T procedures if appropriate;
- xxiv) Requirements for the operation of cranes and other tall structures;
- xxv) Arrangements for the receipt and movement of heavy or bulky loads;

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xxvi) Requirements of vehicle and area cleanliness, also the implications of FOD and loose material hazards for aircraft operations;

- xxvii) Arrangements for the disposal of waste;
- xxviii) Information on the safety implications for the site and staff of special aircraft hazards including blast, vibration, fumes and noise;
- xxix) Information on the effects of strong winds at the aerodrome;
- xxx) Site safety, including personnel protection;
- xxxi) Rules and guidance on control of work in progress is given in AMCs and GM to ADR.OPS.B.070.
- xxxii) Aerodrome operators should ensure that projects are pre-emptively coordinated with all stakeholders, with emphasis on ATM/ANSPs. Communications should continue through the project and may include Safety Alerts, AICs, and NOTAMs.

When the TM-CAD has been assured that the aerodrome can continue to operate safely during the project, approval will be given to commence work.

Part 3: Commissioning.

On completion of the project, the Aerodrome Operator shall apply the necessary procedures to ensure that the change is introduced safely and seamlessly. Such procedures should include, testing, simulations, inspections, and auditing involving all stakeholders.

The Aerodrome Operator should confirm to TM-CAD that the completed project meets the agreed design criteria and its intended use. Furthermore, if the changes impact the contents of the Aerodrome Manual, these shall be immediately incorporated, and a revised version submitted to TM-CAD.

Finally, the Aerodrome Operator should resubmit the amended CB reflecting the changes. TM-CAD will sign the CB to confirm its approval.

b. Changes to the Management System

The EASA Aerodrome Regulation specifies that changes significantly affecting elements of the aerodrome operator's management system listed in ADR.OR.D.005, require the approval of TM-CAD before implementation.

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TM-CAD considers the following management system changes as requiring its approval:

- i) Changes in nominated persons;
- ii) Changes involving organizational structure;
- iii) Changes to policies or safety culture of the management system;
- iv) Changes to management system procedures.

Application with TM-CAD should be done on the form ANSAU_ADR_001_CHNG and is to include a safety risk assessment which should demonstrate how the aerodrome operator would be ensuring that these changes are effectively managed, guaranteeing safe operation of the aerodrome, in accordance with regulatory requirements.

Following receipt of such an application, TM-CAD may require a meeting to discuss the changes and request further information as necessary. In case of changes to nominated persons, TM-CAD may assess his/her qualifications and interview the nominee to evaluate his/her suitability for the post. In this regard, the Aerodrome Operator shall forward to TM-CAD a copy of the prospective employee's Curriculum Vitae together with a copy of the proposed employment contract redacted of financial details.

Once this change is approved by TM-CAD and implemented by the aerodrome operator, the latter should confirm that it meets any agreed criteria and is fit for purpose. The aerodrome operator should resubmit the amended Operator & Operations Basis (O&OB) and Aerodrome Manual reflecting the change. TM-CAD will sign the O&OB to confirm its approval and forward this to the aerodrome operator.

c. Changes to the Terms of the Certificate

Changes to the operation that might alter the terms of the certificate which is attached to the aerodrome certificate require prior approval of TM-CAD. These changes include the following:

- i) Changes to the permanent level of protection of RFFS;
- ii) Changes to the Higher Code Aircraft;
- iii) Changes to the aerodrome coding;
- iv) Changes to the declared distances;
- v) Changes to Low Visibility Procedures.

Application with TM-CAD shall be done on the form ANSAU_ADR_001_CHNG and is to include a safety risk assessment which needs to demonstrate how the aerodrome operator would be ensuring that these alterations will be effectively managed, guaranteeing safe operation of the aerodrome in accordance with regulatory requirements.

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Upon receipt of this application, TM-CAD may call a meeting to discuss the changes and request further information as necessary.

Once this change is approved by TM-CAD and implemented by the aerodrome operator, the latter should confirm that it meets any agreed criteria. The aerodrome operator should resubmit the amended Terms of Certificate, Certification Basis, and Aerodrome Manual reflecting the change. TM-CAD will sign the Terms of Certificate and Certification Basis to confirm its approval and forward this to the aerodrome operator.

d. Changes that make use of Alternative Means of Compliance (AltMOC)

Should the Aerodrome Operator determine that it is conducive to use Alternative Means of Compliance to those Acceptable Means of Compliance adopted by EASA, it shall provide TM-CAD the following:

- i) Full description of the AltMOC including revisions to manuals/procedures;
- ii) A Safety Risk Assessment.

TM-CAD may require further information to assess the suitability of this application and to ensure that compliance with EU2018/1139 and EU139/2014 is guaranteed. The Aerodrome Operator shall implement the relevant AltMOC only after approval from TM-CAD is secured.

e. Changes to Aerodrome Operator's change management procedures.

The Aerodrome Operator shall, as part of its management system, develop a procedure by which it implements the change management process within the organization. Such procedures shall include the processes prescribed by EU139/2014 and follows the guidelines established by TM-CAD within this Advisory Document.

The procedure to manage these changes should be developed taking into consideration the aerodrome's policies and processes, and shall include as a minimum:

- i) Accountabilities for changes;
- ii) A policy statement on those changes that require prior approval;
- iii) Inclusion in the Aerodrome Manual;
- iv) The process for undertaking safety assessments, including hazard analysis;

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- v) A list of projects that do/do not require prior approval; and
- vi) The process, agreed with TM-CAD, on how changes not requiring approval shall be notified

Such procedure shall be approved by TM-CAD prior to implementation.

6. CHANGES NOT REQUIRING PRIOR APPROVAL

Some changes do not require approval from the Competent Authority prior to introduction. Notwithstanding, TM-CAD requires that it is notified with such alterations and the Aerodrome Operator is expected to process these in accordance with the approved procedure referred to in Para 5(e) of this document.

These changes shall be notified via email to the designated TM-CAD Aerodrome Inspector and shall include:

- i) Full description of the change including revisions to manuals/procedures;
- ii) Copy of the relevant Safety Risk Assessment.

7. REFERENCES

EU 2018/1139 New Basic Regulation

EU 139/2014 Aerodrome Regulation

EASA AMC/GM to the Aerodrome Regulation

ICAO Annex 14 Vol I Aerodromes

ICAO Annex 19 Safety Management

ICAO Doc 9859 Safety Management Manual

ICAO Doc 9981 PANS Aerodromes