

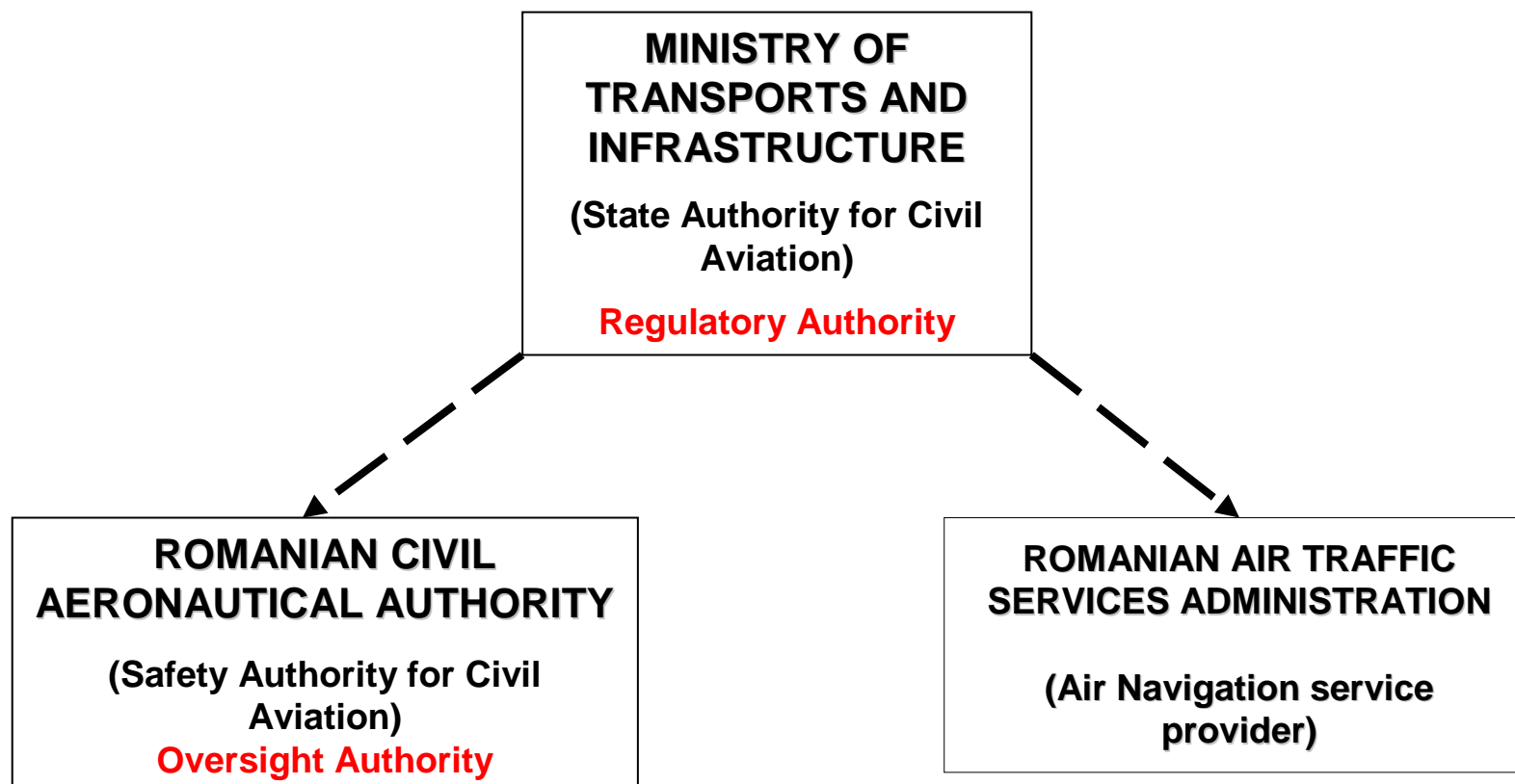
Experiences and practices on the ANSP/NSA interface within FAB – Relevance of impact assessment of (new) regulatory requirements

Presented by
Claudia VÎRLAN, Director general

Content

- National environment;
- Global and regional rulemaking processes;
- DANUBE FAB environment;
- Conclusions.

National environment



Separated and autonomous

NSA/ANSP interface

- Monthly meetings at strategic level with authorities and stakeholders coordinated by State Authority (Aviation Council);
- Several dedicated meetings dedicated to approvals and certification aspects;
- Co-ordinated representation at international level;
- Regulatory consultation process between authorities and stakeholders subject to a specific national procedure;
- Appeal procedure in place.

National regulatory approach

- Well defined process within The National Civil Aeronautical Regulation;
- Set up the steps to be followed for drafting national regulations and procedures:
 - ☐ initiation of the drafting process;
 - ☐ consultation/information of affected stakeholders;
 - ☐ response documents and meetings to harmonize views;
 - ☐ issuance of the final draft ;
 - ☐ approval of regulations by Ministerial Order and publication
 - ☐ approval of procedures by Decision of Directors General of Romanian CAA

Global and regional rulemaking

- **ICAO framework:** Standards & recommended practices, regional air navigation plans;
 - New regulatory requirements are debated within regional air navigation planning groups (e.g. EANPG)
 - Both NSA and ANSP participate to discussions;
 - Final drafts are received by NSA;
 - ANSP is consulted via correspondence and/or dedicated meetings ;
 - Common view is finally sent to ICAO.

Global and regional rulemaking

- **EUROCONTROL:** ESARRs, advisory materials, guidelines and (new) common specifications
 - The consultation process is consistent with the principles of the EUROCONTROL Notice of Proposed Rule Making (ENPRM) framework;
 - Several consultation workshops are organized as required;
 - Both NSA and ANSP participate directly in the process;
 - Each part comment according with its role and responsibility;

European rulemaking

- **EU/EASA:** Regulations, decisions, directives, acceptable means of compliance and guidance materials, certification specifications;
 - Well established regulatory framework and consultation process (NPA);
 - Both NSA and ANSP can send comments within NPA;
 - Working groups and workshops are organized under European Commission coordination (ANSP can participate as observers);
 - ANSPs are represented within CANSO, member of Industry Consultation Body (ICB);

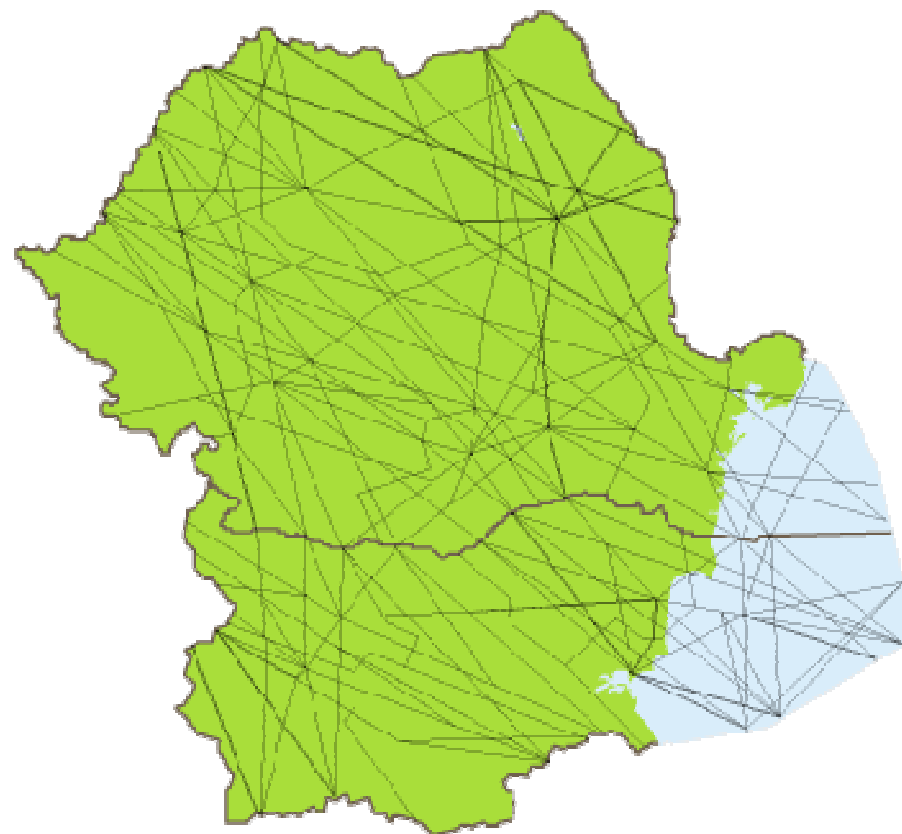
DANUBE FAB context

 ROMANIA

- 2 NSAs
- 2 ANSPs

 REPUBLIC OF
BULGARIA

- 1 NSA
- 1 ANSP



DANUBE FAB actors - ANSPs

ROMATSA

- ATSP;
- CNS SP;
- AISP;
- MET SP

**AIS Office
(RCAA)**



BULATSA

- ATSP;
- CNS SP;
- AIS P (only
PIB);
- MET SP.

Similar organisation
Similar ATM environment

DANUBE FAB actors - NSAs

Ministry of Transports & Infrastructure

- Directorate general for civil aviation (NSA for security)
- Romanian CAA (NSA)

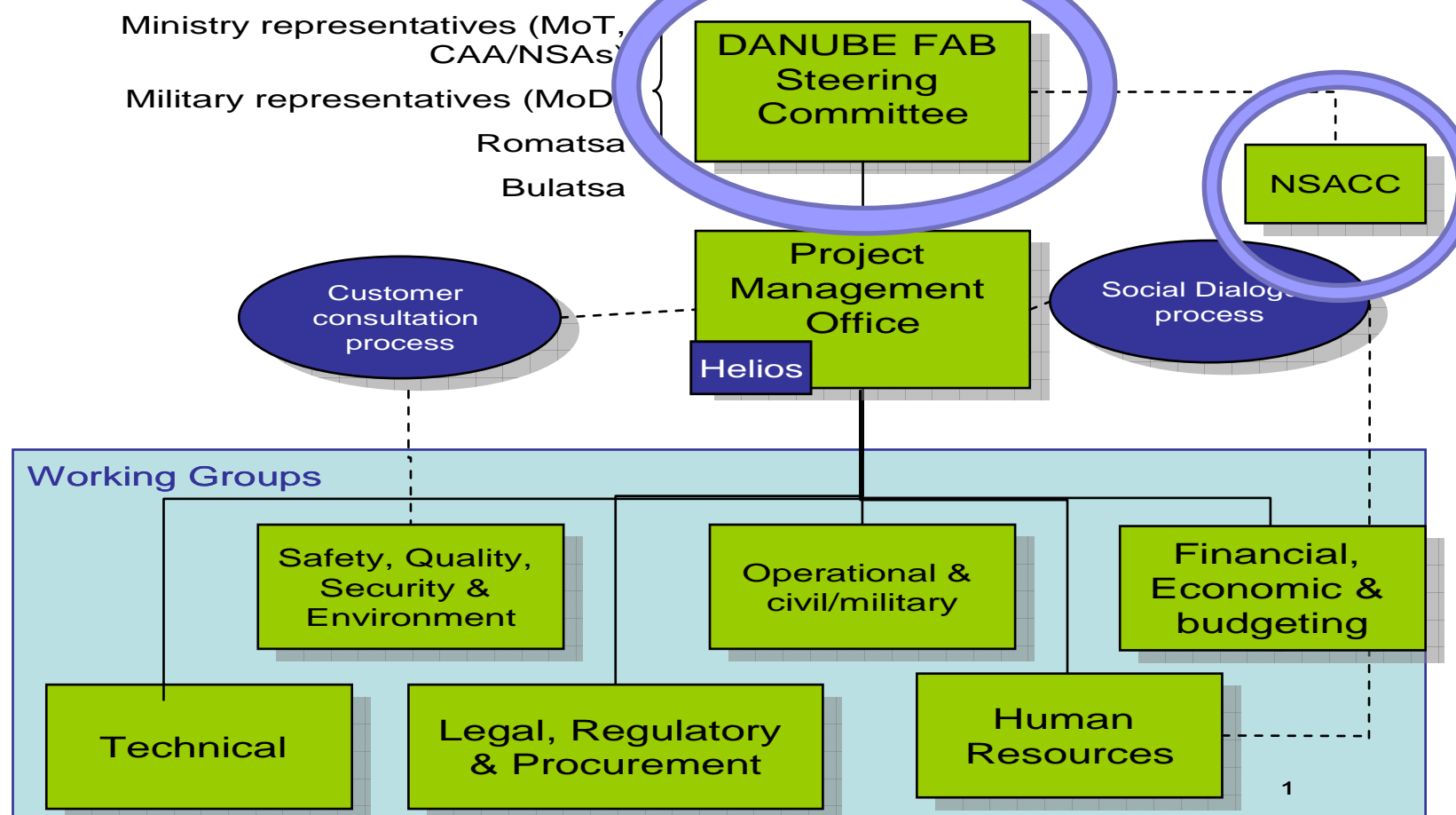


Ministry of Transports, IT & Communications

- Directorate general for civil aviation administration

**Similar oversight environment
BUT
Different resources**

DANUBE FAB project phase



NSAs/ANSPs interface

- **Decisions** are adopted by the Steering Committee (strategic level);
- **at NSAs level:**
 - NSA Coordination Committee;
 - ANSPs and military authorities representatives are participating in the meetings, as observers;
- **at ANSP level:**
 - WGs above mentioned were established and NSAs representatives are participating in the meetings, as the case may be, as observers;

NSAs/ANSPs interface

Consultation processes, related and relevant for FAB:

- ☐ Common understanding of specific roles and responsibilities for each body involved in the implementation of any particular (new) regulatory requirement applicable to ANSP and/or NSA / CA
- ☐ Appropriate management of accident and serious incident investigations
- ☐ Establishing working arrangements on FAB performance
- ☐ Harmonized representation at European level (IP 1, NM, IDSG)

Challenges

- Harmonization of specific applicable rules and procedures needs to be a continuous process, due to:
 - external factors: in particular, new EU legal framework;
 - objective factors at national level:
 - different legal and institutional frameworks;
 - language differences;
 - differences between the necessary resources;
 - variation in time between what is needed and what is available in terms of resources at NSAs level;

Challenges

- Development of necessary interfaces;
- Although only two States involved, consultation mechanisms must ensure formal approach;
- Time interval for consultation is very limited (3 months within EASA);
- FAB related regulatory impact assessment almost impossible;
- ANSP/NSA dialogue is essential considering the lack of resources (time, subject related experts at NSA level).

Conclusions

- Extensive consultation ensures the stability of the implementation of new requirements;
- Dialogue and communication between ANSP and NSA ensure transparencies and build up the trust while respecting each others roles and responsibilities in the interest of safety;
- Common understanding and effective relationship between ANSP and NSA are essential in the FAB context.



Thank you!

Any questions?