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AN 4/1.1.53-13/81

Date 11 April 2014  
Subject **Comments on ICAO State Letter AN 4/1.1.53-13  
Proposal for the amendment of Annex 14, Volume I  
and proposed Procedures for Air Navigation Ser-  
vices – Aerodromes (PANS – Aerodromes)**

#### **Discussion:**

The development of PANS Aerodromes (PANS ADR) is welcomed as it is indeed helpful for aerodrome operators to be provided with clear provisions for airport operational matters. PANS provisions are approved by the Council for worldwide application. In general PANS documents contain, for the most part, operating procedures regarded as not yet having attained a sufficient degree of maturity for adoption as International Standards and Recommended Practices.

It can therefore be noted that the 1st edition of PANS ADR is unusual as it contains in its chapters 2 and 3 provisions for the certification of aerodromes and safety assessments for aerodromes for which other ICAO documents already provide guidance. On the other hand actual operational procedures for aerodromes are only foreseen in a future chapter 5 of PANS ADR planned for the 2nd edition due in 2018. As a consequence of this approach this 1st edition of PANS requires a very stringent content management of the respective chapters in order to avoid inconsistencies, omissions, repetitions and contradictions with other ICAO documents, in particular ICAO Doc. 9774 on aerodrome certification and to some extent also Doc.9859 on Safety Management, as well as the new Annex 19.

The analysis of the proposed changes to Annex 14 and of the proposed PANS ADR text has revealed some inconsistencies, omissions, repetitions and contradictions with Annex 19, Annex 14 as well as with the above mentioned ICAO documents. Hence the PANS ADR document and the proposed changes to Annex 14 are not yet mature enough for adoption.

It is therefore recommended that the PANS study group or the ICAO secretariat should review the PANS ADR document in order to eliminate inconsistencies, omissions, repetitions and contradictions with Annex 14, other ICAO Annexes and ICAO Documents 9774 and 9859.

Such a review might also consider the consolidation of the material in the aforementioned chapters 2 and 3 and their multiple appendices and attachments into the related aforementioned ICAO manuals.

#### **Recommendation:**

1. ATTACHMENT A to State letter AN 4/1.1.53-13/81  
Paragraph 1.2

"In reality, many existing aerodromes worldwide were not built to the full design standards specified in the existing Annex 14, Volume I and, in certain cases, it is impossible or impracticable for those aerodromes to render their infrastructure to be in accordance with the Annex design Standards".

*Not acceptable*

**Justification:** Many provisions in Annex 14, Vol. 1 on physical characteristics are recommended practices e.g. runway width (3.1.10) and not standards. Therefore referring to design standards or Standards seems to be inaccurate. Suggested is to replace the word "standards" in both cases by "specifications of Annex 14" so as to cover also the recommended practices. This would be in line with Annex 14, Vol. 1, 1.2.

2. ATTACHMENT B to State letter AN 4/1.1.53- 13/81

- PUBLICATIONS (related to the specifications of this Annex)
  - *Advanced Surface Movement Guidance and Control Systems (A-SMGCS) Manual* (Doc 9830)
  - *Manual on the ICAO Bird Strike Information System (IBIS)* (Doc 9332)
  - *Procedures for Air Navigation Services —Aerodromes (PANS-AERODROMES)* (Doc xxxx)
  - *Procedures for Air Navigation Services — Aircraft Operations (PANS-OPS)* (Doc 8168)
  - *Volume I — Flight Procedures*
  - *Volume II — Construction of Visual and Instrument Flight Procedures*

*acceptable*

- *Annex 14 —Aerodromes Volume I — Aerodrome Design and Operations*

## CHAPTER 1. GENERAL

**Provisions for the accommodation of more demanding aircraft at existing aerodromes can be found in Procedures for Air Navigation Services (PANS)- Aerodromes (Doc xxxx).** *Guidance on some possible effects of future aircraft on these specifications is given in the Aerodrome Design Manual (Doc 9157), Part 2.*

*acceptable*

- 1.4 Certification of aerodromes

1.4.1 States shall certify aerodromes used for international operations in accordance with the specifications contained in this Annex as well as other relevant ICAO specifications through an appropriate regulatory framework.

**Note.— Specific procedures - on the stages of certifying an aerodrome is given in the Procedures for Air Navigation Services (PANS) - Aerodromes (Doc xxxx). Further guidance on aerodrome certification can be found in Doc 9774, Manual on Certification of Aerodromes.**

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1.4.4 As part of the certification process, States shall ensure that an aerodrome manual which will include all pertinent information on the aerodrome site, facilities, services, equipment, operating procedures, organization and management including a safety management system, is submitted by the applicant for approval/acceptance prior to granting the aerodrome certificate.

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**Note 1.— Contents of an aerodrome manual, including procedures for its submission and approval/acceptance, verification of compliance and granting of aerodrome certificate, are available in the PANS-Aerodromes (Doc xxxx).**

*1.4. 1 and 1.4.2: Partially not acceptable*

**Justification:** Chapter 2 of PANS Aerodromes on aerodrome certification contains repetitions and inconsistencies. Attachment A to PANS ADR has a list of possible subjects in an aerodrome manual. However this list is shorter than the manual description under 2.2.2.1 itself and also contains unnecessary repetitions. Furthermore it is not based entirely on Appendix 1 to Doc. 9774. The proposed minimum content of the aerodrome manual in PANS ADR under 2.2.2.1 does not coincide with that found in Appendix 1 (particulars to be included in an aerodrome manual) to Doc. 9774. The discrepancies found regard the inspection of OLS by the operator, obstacle control and the protection of sites for radar and navigational aids. At the same time Attachment A to PANS Aerodrome contains aerodrome procedures for snow and ice control, and other hazardous meteorological conditions, which are not found in Doc. 9774.

*Note 2. - The intent of a safety management system is to have in place an organized and orderly approach in the management of aerodrome safety by the aerodrome operator. Annex 19 —Safety Management contains the safety management provisions applicable to certified aerodrome. Guidance on an aerodrome harmonized safety management system is given in the Safety Management Manual (SMM) (Doc 9859) and in the Manual on Certification of Aerodromes (Doc 9774).*

**Procedures on the management of change, conduct of safety assessment, reporting and analyses of safety occurrences at aerodromes and continuous monitoring to enforce compliance with applicable specifications so that identified risks are mitigated can be found in PANS-Aerodromes (Doc xxxx).**

*Partially not acceptable*

**Justification:** Inconsistency of PANS ADR, chapter 3 on Safety Assessments for aerodromes, with Annex 14 2013 edition and Annex 19. Annex 19 which became applicable as of November 2013, foresees that aviation organizations comply with the same SMS principles. To this end, all SMS related provisions contained in individual annexes, including Annex 14, have been transferred to Annex 19. It is therefore proposed to make here only a reference to Annex 19 and the Safety Management Manual (SMM or Doc 9859). The (old) reference to the Manual on Certification of Aerodromes (Doc 9774) and the reference to PANS ADR should be deleted until the material found in both documents has been checked for possible repetitions and aligned with the material found in the SMM. The SMM (Doc 9859) contains the details for practical SMS implementation, including example on who to undertake safety assessments.

Furthermore, paragraph 3.1. of PANS-ADR repeats the already repealed SMS requirement of Annex 14 paragraph 1.5 (5th edition of Annex 14) which contradicts ICAO's objective to address all operators (now called service providers) only in one place, this place being Annex 19. It is also noted that the above mentioned

provisions of PANS-ADR on SMS are not fully in line with the relevant provisions of Annex 19. So it is suggested to delete paragraph 3.1 in chapter 3 of PANS ADR (see appendix 2 for illustration of the problematic repetition).

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- 1.7 Aerodrome Operations

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*Introductory Note.— This section introduces Procedures for Air Navigation Services (PANS)-Aerodromes (Doc xxxx) for the use of aerodromes undertaking an assessment of its compatibility for the type of traffic or operation the aerodrome is intending to accommodate. The material in the PANS-Aerodromes addresses operational issues faced by existing aerodromes and provides the necessary procedures to ensure the continued safety of operations. Where alternative measures, operational procedures and operating restrictions have been developed, these should be detailed in the aerodrome manual and reviewed periodically to assess their continued validity. The PANS-Aerodromes is not intended to substitute nor circumvent the provisions contained in this Annex. It is expected that new infrastructure on an existing aerodrome or a new aerodrome will fully comply with the requirements in this Annex. See Annex 15, 4.1.2 (c) on States' responsibilities on listing of differences with the related ICAO Procedures in the Aeronautical Information Publication.*

1.7.1 When the aerodrome accommodates an aeroplane that exceeds the certificated characteristics of the aerodrome, the compatibility between the operation of the aeroplane and aerodrome infrastructure and operations shall be assessed and appropriate measures be developed and implemented in order to maintain an acceptable level of safety during operations.

*Note.— Procedures to assess the compatibility of the operation of a new aeroplane with an existing aerodrome can be found in the Procedures for Air Navigation Services-Aerodromes (Doc xxxx).*

1.7.2 Information concerning alternative measures, operational procedures and operating restrictions implemented at an aerodrome arising from 1.7.1 shall be promulgated.

*Note 1. See Annex 15, Appendix 1, AD 2.20 on the provision of detail description of local traffic regulations.*

*Note 2 — See Procedures for Air Navigation Services-Aerodromes (Doc xxxx), Chapter 3, section 3.6 on promulgation of safety information.*

*regarding new section 1.7: Partially not acceptable*

*Justification: There is inconsistency between the sentences "The PANS-Aerodromes is not intended to substitute nor circumvent the provisions contained in this Annex " and "It is expected that new infrastructure on an existing aerodrome or a new aerodrome will fully comply with the requirements in this Annex. "*

The latter implies that old infrastructure at an existing aerodrome must not (in the first instance) seek to comply with the provisions of Annex 14. This amounts to a de-facto "grandfathering" of old infrastructure at an existing aerodrome. It is therefore suggested to delete the sentence, not least because it furthermore is in contradiction with the introductory sentence of chapter 1 of Annex 14.

Annex 14 does not make a distinction between existing and new infrastructure at aerodromes and it is important not to dilute the obligation of all aerodrome infrastructure to be provided in accordance to the specification of the Annex 14 by installing a contradiction to this overall objective enshrined in the convention un-

der Article 28 which states that the Contracting states are to provide airports in accordance with the standards and practices recommended or established from time to time pursuant to the Convention.

It is therefore contrary to the Convention and contrary to the introductory note of Annex 14 to install de-facto derogation from the SARPs of the Annex 14 to old infrastructure of existing aerodromes inside this very same annex. Introducing a distinction between "old" and "new" infrastructure at existing aerodromes has unpredictable and potentially far-reaching legal consequences.

It is therefore suggested to delete or reword the sentence: *It is expected that new infrastructure on an existing aerodrome or a new aerodrome will fully comply with the requirements in this Annex.* '

There is inconsistency between proposed Annex 14 change (section 1.7) and the material contained Doc. 9774 (Manual on aerodrome certification) particularly in its Appendix 3. This inconsistency concerns the level of safety to be attained by of appropriate mitigation measures derived from the conclusions of a safety assessment. Given that the content of PANS ADR is meant for world-wide application and the material from Doc. 9774 has been facilitating aerodrome certification for years it is vital that the two documents are aligned.

This is especially true when it comes to the treatment of deviations from applicable requirements: here the earlier Doc. 9774 on Aeronautical studies states that *"technical analysis will provide justification for a deviation on the grounds that an equivalent level of safety can be attained by other means"*, while the proposed new section 1.7 on Aerodrome Operations introducing (safety) assessments for the compatibility for the type of traffic or operation the aerodrome is intending to operate and outcome of which would be appropriate measures *"in order to maintain an acceptable level of safety"* (see 1.7.1). This discrepancy now leaves the States and aerodrome operators in the Member States with no explanation as to the difference or non-difference of the two concepts.

It is therefore suggested to replace the word "acceptable" with the word "equivalent".

### 3. ATTACHMENT C to State letter AN 4/1.1.53- 13/81

*regarding draft PANS Aerodromes: Partially not acceptable*

**Justification:** Abundance of, at times, repetitious guidance material inside PANS ADR appendices and attachments.

The PANS ADR document contains many appendices and attachments. Such material seems not to be appropriate for PANS level. It would be useful if the PANS ADR study group could either check for omissions, discrepancies and additions and then align the two documents, involving an update of Doc. 9774 Manual on Aerodrome Certification, while removing unnecessary details from the PANS ADR or the group might consider that perhaps PANS ADR needs to establish real provisions and not be a gathering of guidance material which exist at other level as it could be argued that such repetition is not needed.

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