QUICK BRIEF: EU 2017/373

From 2nd January 2020, we will be operating under the regime of EU 2017/373. This lays down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight.

Much has been said about the changes the '373' will bring along and all the 'new' things that need to be done to meet the new regulatory requirements. An analysis of the changes made to the change requirements reveals the changes are evolutionary in nature rather than revolutionary. Many of the new requirements and Acceptable Means of Compliance (AMC) are actually good practices that have been in use for quite a number of years. For ease of reference, the table below list the main changes and some remarks about them. This may be useful for readers who are involved in safety change processes.

Change	Remark
Severity Scheme	No longer mandated but ANSPs need to formulate one for the risk analysis.
Safety Objectives	No longer required but replaced by the notion of Safety Criteria.
Safety Criteria	A set of high-level goals devised by analysing aspects of the new or changed functional system and then captured through a set of safety requirements.
Software specific requirements	Now at the level of Acceptable Means of Compliance (AMC).
Notification of Changes	The Competent Authority (CA) has to be notified of <u>all</u> changes, not just safety-related changes.
Safety Assessment/Case or Safety Support Assessment/Case	Air Traffic Services (ATS) providers have to perform a safety assessment and document it in the form of a safety case. <u>Non-air traffic services providers</u> have to perform a safety <u>support</u> assessment and document it in the form of a safety <u>support</u> case (SSC). • Workflows and processes are similar but require adaptations. • Non-air traffic services providers do not need to do hazard Identification or formulate Safety Criteria but they have to meet service specifications.
Preliminary Safety Assessment	Required for notification to CA. Similar to the current 'Safety Considerations' process. For non-air traffic services providers, the PSA is expressed in terms of what aspects of the performance of the service are impacted by the change. (Not to be confused with Preliminary System Safety Assessment [PSSA, a phase when using the Safety Assessment Methodology, or SAM].)
Service Specification	For SSC: • service has been defined in terms of functionality, performance and the form of the interfaces • correctly and completely records the conditions under which the specification of the service is true • interactions of components, under failure conditions or failures in services delivered to the components, have been assessed for their impact on the service and, where necessary, degraded modes of service have been defined • encompasses the interaction with the environment.
Monitoring Criteria	Criteria to demonstrate that the service delivered by the changed functional system will continue to meet the safety criteria. Demonstrate that the safety case remains valid during the operation of the changed functional system. For SSC: • demonstrate that the service delivered by the changed functional system will continue to behave only as specified in the specified context.
Proxy	A measure of a certain property along the causal trajectory between the hazard/event and the harmful effects of the hazard/event in question. Mentioned only in AMC. In the safety assessment of functional systems, the value of a proxy may be used as a substitute for a value of risk.

The consolidated version (Easy Access Rules for Air Traffic Management/Air Navigation Services [ATM/ANS]) can be found under the following link: https://www.easa.europa.eu/document-library/general-publications/easy-access-rules-air-traffic-managementair-navigation or http://bit.ly/2CQFfS1

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