



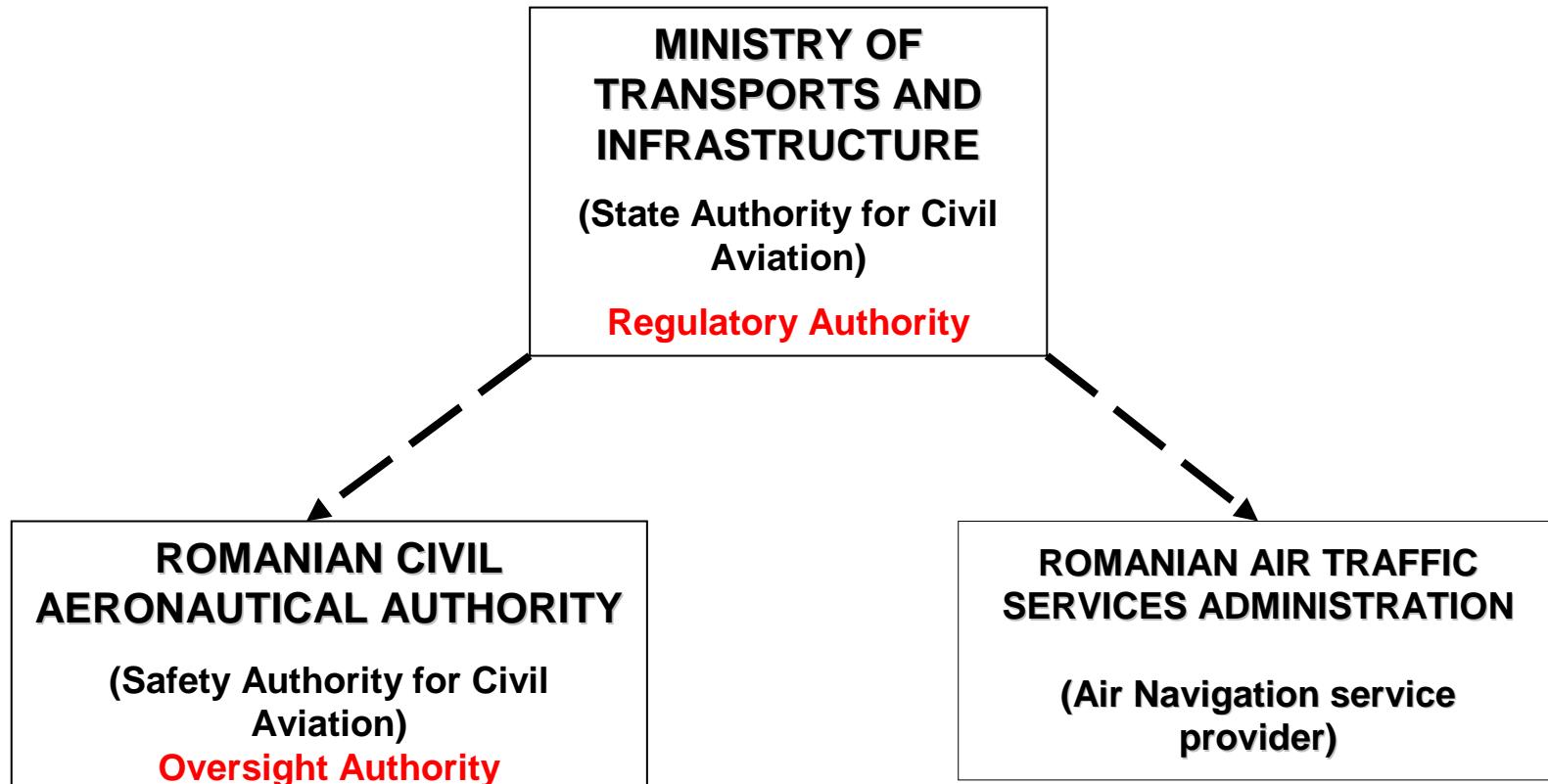
# Experiences and practices on the ANSP/NSA interface within FAB – Relevance of impact assessment of (new) regulatory requirements

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# 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);

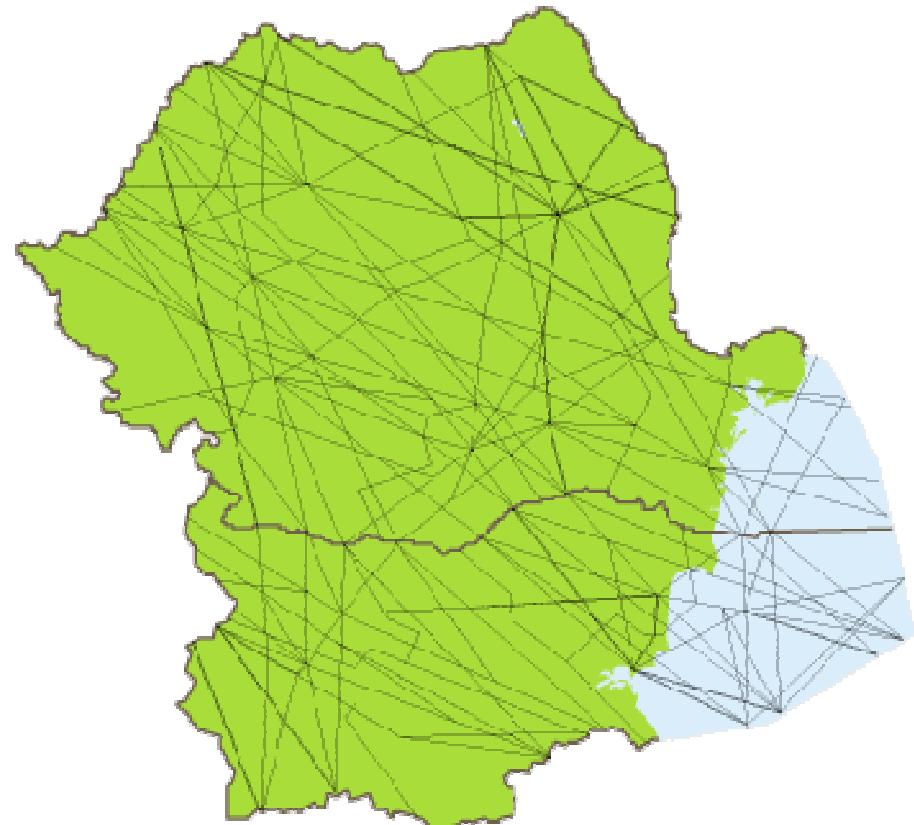
# DANUBE FAB context



- 2 NSAs
- 2 ANSPs



- 1 NSA
- 1 ANSP



# DANUBE FAB actors - ANSPs

## ROMATSA

- ATSP;
- CNS SP;
- AIS P;
- 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)

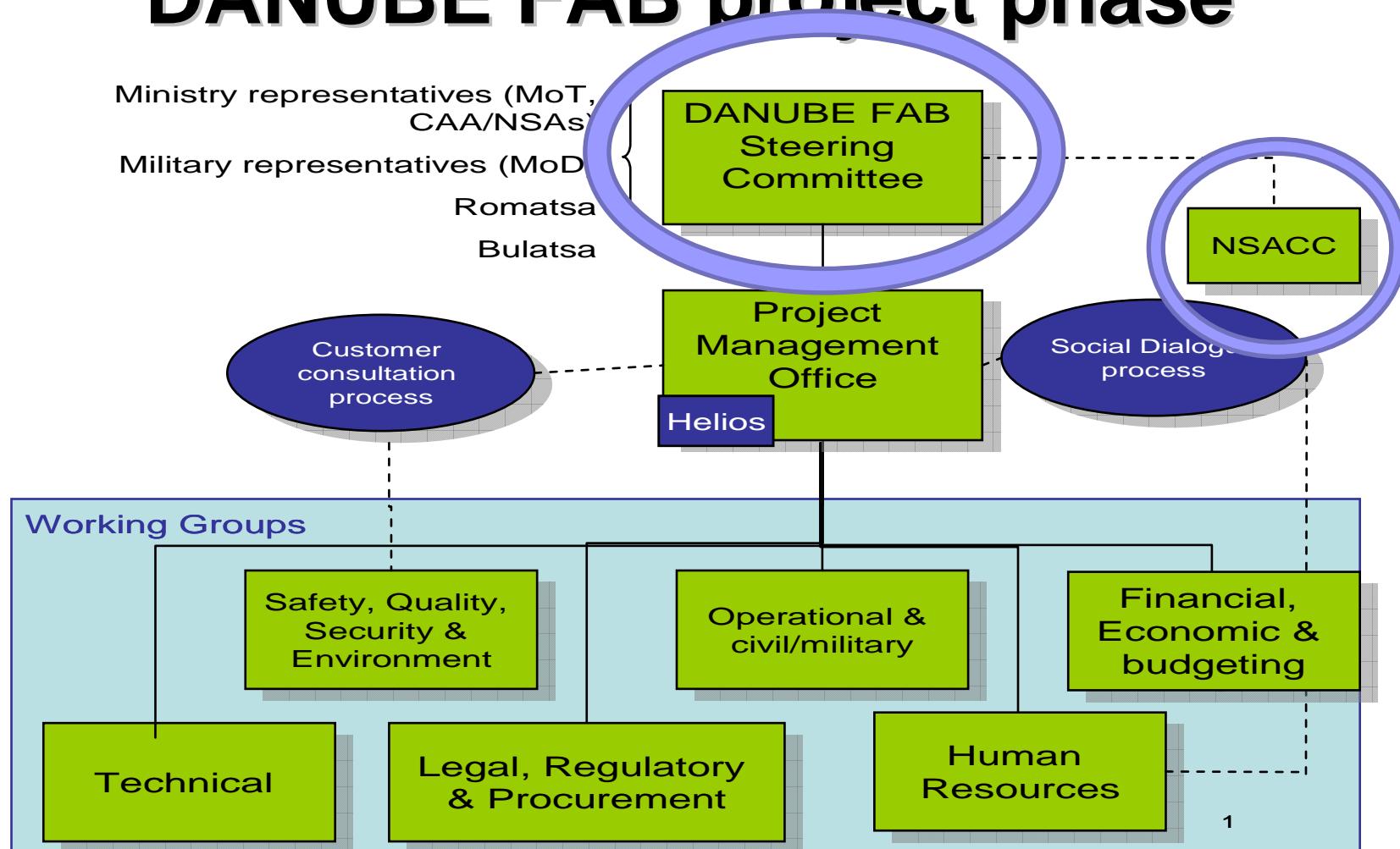


## Ministry of Transports, IT & Communications

- 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?