

COVID-19

By France Aviation Civile Services



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With the COVID 19 crisis, many airlines, maintenance organizations; training organizations had to stop or adapt their activities. The National Civil Aviation Authorities (NAA) had also to postpone the majority of their oversight activities planned as part of their surveillance process, especially on-site audits, and inspections. As a consequence, to go back to normal operations, organizations and NAA will have to set up a recovery plan in order to ensure the safety of the operations and to catch up with deadlines that fell during this period.

The purpose of this document is to assist the National Civil Aviation Authorities in the resumption of activities by recalling the regulatory references that may have been impacted by the COVID-19 crisis. This document consists of guides for the NAA to enable it to fulfil its role as regulator and safety supervisor prior to the resumption of activities. It also includes checklists to assist airport managers in conducting the controls that are their responsibility.

This document is intended to evolve in line with the experience gained during this crisis, which was in many ways exceptional.

The document covers at this stage the areas covered by ICAO Annexes 1, 6, 8, 14, 18 and 19. It is composed of 3 parts:

- Air operations
- Airports
- The Air Navigation Service Provider (ANSP)

France Aviation Civile Services is at the disposal of authorities and operators who need support on all or part of these topics.

In parallel with this work, traffic data is being collected in order to best anticipate the resumption of traffic.

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Part I – Air Operations

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The goal of this document is to **highlight the regulatory provisions contained in ICAO Annex 1, 6, 8 and 18 that may be affected by this period of inactivity** and for which the NAA and organizations should have a thorough review to accompany a return to normal operation. **The continuous compliance with regulations should be combined with a safety decision-making process conducted by the NAA together with the SMS of approved organizations.**

This document is based on requirements contained in Annexes to the Chicago Convention, each State being responsible to promulgate them in their own national regulations.

1. Operation of aircraft

1.1 Air Operator Certificate and its Operation specifications

Annex 6 Part 1 contains the requirements for air operators to operate international air transport with aeroplane. It also provides requirements to the NAA as the State of the Operator or the State of Registry.

The NAA has to grant the airlines its Air Operator Certificate (AOC) with its Operations specifications and also approvals and acceptance that are listed throughout the Annex, as summarized in Attachment D.

A 6 4.2.1.3 The issue of an air operator certificate by the State of the Operator shall be dependent upon the operator demonstrating an adequate organization, method of control and supervision of flight operations, training programme as well as ground handling and maintenance arrangements consistent with the nature and extent of the operations specified.

A6 4.2.1.4 The continued validity of an air operator certificate shall depend upon the operator maintaining the requirements of 4.2.1.3 under the supervision of the State of the Operator.

According to Doc 8335, the NAA is responsible to monitor the operation by a systematic procedure which establishes safety oversight inspections. During a period like the COVID-19 such supervision was on hold or very limited. Many of the authorizations, approvals will still be valid to go back to normal operations but **the validity of some authorizations may be exceeded and the audits/inspections to be performed by the NAA for their renewal could not be realized.**

Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A6 4.2.1.1 A6 4.2.1.4 A6 App 6 Doc 8335 Chap4	Air Operator Certificate	Issued by the State of the operator	Validity decided by the State of the Operator	If no period of validity, should be mentioned on the AOC
A6 4.2.1.2 A6 App 6	Operations specifications	Issued by the State of the operator	Linked to the AOC	

During the COVID-19 crisis, some States may have issued orders or laws to extend the validity of the AOC or other authorizations, on the basis of safety analysis. **The NAA has to prepare a new safety oversight inspections plan** to implement as soon as the operations can restart.

On their side, **each air operator should have, through its Safety Management System, assessed the safety risks on their operations due to the “break”** imposed by COVID 19 crisis. ICAO Annex 19 and Doc 9859 Safety Management Manual contain requirements and guidelines to implement those. Air operators need to identify the areas at risk and pay special attention to them to prepare a recovery plan, to implement mechanisms for the resolution of safety risks. These analyses should be shared with the NAA who is responsible for continuous oversight and who may decide to extend some validity, to perform “remote” inspections through videos, pictures, documents reviews.

The **analysis of the regulation below shows that special attention should be paid to the requirements regarding maintenance of the aircraft and flight crew training**. It should be combined with the safety analysis performed by the air operators and NAA mentioned before.

1.2 Flight crew

Annex 1 gives the requirements for the initial licensing of flight crew and Annex 6 contains the requirements for their training, experience, special qualifications.

For flight crews operating international flights under the AOC of the airlines employing them, these requirements are usually taken into account in the flight crew scheduling system. This system implements the Flight training programme approved by the NAA (Annex 6 §9.3.1).

However, **during a period of inactivity such as the one we are facing with the COVID 19 crisis, all the flight crew schedules have to be reviewed and some period of validity may have expired**. Some flight crew may have to be scheduled on some training before flying. In order to avoid an important number of trainings and checks, each air operator should have a plan to prioritize the training schedule of their flight crew and should share it with the NAA.

Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A6 9.4.4	Pilot proficiency checks: - twice within any period of one year - Two such checks similar and in a period of 4 consecutive months do not satisfy the requirements	Operator, supervised by the State of the operator	Due twice a year	A6 9.4.4.2: combination possible for variants; decided by the State of the operator
A6 9.4.1	Recent experience: <u>pilot-in-command or a co-pilot</u> to operate at the flight controls of a type or variant of a type of aeroplane during take-off and landing unless that pilot has operated the flight controls during at least three take-offs and landings within the preceding 90 days on the same type of aeroplane or in a flight simulator approved for the purpose	Operator, supervised by the State of the operator	Validity in the preceding 90 days	A6 9.4.1.2 combination possible for variants; decided by the State of the operator
A6 9.4.2	Recent experience — <u>cruise relief pilot</u> : a pilot to act in the capacity of cruise relief pilot in a type or variant of a type of aeroplane unless, within the preceding 90 days that pilot has either: a) operated as a pilot-in-command, co-pilot or cruise relief pilot on the same type of aeroplane; or b) carried out flying skill refresher training including normal, abnormal and emergency procedures specific to cruise flight on the same type of aeroplane or in a flight simulator approved for the purpose, and has practiced approach and landing procedures, where the approach and landing procedure practice may be performed as the pilot who is not flying the aeroplane.	Operator, supervised by the State of the operator	Validity in the preceding 90 days	A6 9.4.2.2: same as above, combination decided by the State
A6 9.5.3.5	Route qualification: The operator shall not continue to utilize a pilot as a pilot-in-command on a route or within an area specified by the operator and approved by the State of the Operator unless, <u>within the preceding 12 months</u> , that pilot has made at least one	The operator and approved by the State of the Operator	Validity in the preceding 12 months	9.4.3.6 In the event that more than 12 months elapse in which a pilot-in-command has not made such a trip on a route in close proximity and

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Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
	<p>trip as a pilot member of the flight crew, or as a check pilot, or as an observer in the flight crew compartment:</p> <p>a) within that specified area; and</p> <p>b) if appropriate, on any route where procedures associated with that route or with any aerodromes intended to be used for take-off or landing require the application of special skills or knowledge</p>			<p>over similar terrain, within such a specified area, route or aerodrome, and has not practiced such procedures in a training device which is adequate for this purpose, prior to again serving as a pilot-in-command within that area or on that route, that pilot must requalify in accordance with 9.4.3.2 and 9.4.3.3</p>
A6 9.4.5.1	<p>Requirements of experience, recency and training applicable to <u>single pilot operations intended to be carried out under the IFR or at night.</u></p>	Established by the State of the Operator	Validity established by the State of the Operator	A6 Rec 9.4.5.2 gives these periodicity
A6 chap 14 A18 Chap 10 and Doc 9284	Dangerous goods training programme for operators approved or not approved to transport DG by air	State of the operator	Recurrent training provided <u>within 24 months</u> (Doc 9284)	Doc 9284 Technical instructions Part 1 Chapter 4
A1 1.2.9 A1 App1	Language Proficiency: for aeroplane, airship, helicopter and powered-lift pilots, ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1 (ICAO level 4 minimum Att A)	Licence Holder	Validity depending on the level obtained	Below the Expert Level (Level 6) shall be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level.

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Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
				Rec 1.2.9.6; level 4, every 3 years, level 5 every 6 years

Flight crew may also have their Medical assessment (class 1 or Class 2) due during the period. Annex 1 explicitly provides the possibility for the licensing authority to extend the medical assessment up to 45 days.

Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A1 1.2.5.2	<u>Validity of medical assessment</u> — 60 months for the private pilot licence — aeroplane, airship, helicopter and powered-lift; — 12 months for the commercial pilot licence aeroplane, airship, helicopter and powered-lift; — 12 months for the multi-crew pilot licence aeroplane; — 12 months for the airline transport pilot licence aeroplane, helicopter and powered-lift; — 60 months for the glider pilot licence; — 60 months for the free balloon pilot licence; — 12 months for the flight navigator licence; — 12 months for the flight engineer licence	Licence holder	Validity depending on the licence and the age of the holder (see below)	
A1 1.2.5.2.2	- airline transport pilot licences — aeroplane, helicopter and powered-lift, - commercial pilot licences — aeroplane, airship, helicopter and powered-lift, <u>in single-crew commercial air transport operations carrying passengers</u> passed their 40th birthday	Licence holder	Validity is 6 months if more than 40	

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Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
	the period of validity shall be reduced to six months .			
A1 1.2.5.2.3	- <u>airline transport pilot licences</u> — aeroplane, helicopter and powered-lift, - <u>commercial pilot licences</u> — aeroplane, airship, helicopter and powered-lift, - <u>multi-crew pilot licences</u> — aeroplane, In commercial air transport operations, passed their 60th birthday , the period of validity shall be reduced to six months .	Licence holder	Validity is 6 months if more than 60	
A1 1.2.5.2.4	- <u>private pilot licences</u> — aeroplane, airship, helicopter and powered-lift, free balloon pilot licences, <u>glider pilot licences</u> passed their 40th birthday , the period of validity shall be reduced to 24 months .	Licence holder	Validity is 24 months if more than 40	
A1 1.2.4.4.1	The period of validity of a Medical Assessment may be extended, at the discretion of the Licensing Authority, up to 45 days .	Licensing Authority	Possibility of extension up to 45 days	In some States the extension is already included in the validity of their medical assessment

1.3 Cabin crew

As explicitly stated in Doc 8335, there is no requirement in ICAO annexes for a licence for cabin crew members. Some states may have decided to issue such licence in their national regulation. However, Annex 6 explicitly mentions that operators shall have cabin crew training programme, approved by the State of the Operator and that **cabin crew shall complete a recurrent training programme annually**. Some details on the content of this programme can be found in Doc 10002 and provides some explanations to implement a requalification process in case of a stop in the activity of a cabin crew. The air operator should review its schedule of cabin crew training in order to provide regulatory training before flying.

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<i>Reference</i>	<i>Designation of the requirement</i>	<i>Responsibility</i>	<i>Validity/duration</i>	<i>Comments</i>
A6 12.4	Cabin crew training programme <u>Cabin crew members shall complete a recurrent training programme annually.</u>	Approved by the State of the operator	Validity of 1 year	Doc 10002: The content of recurrent training must be covered within the cycle defined by the State. The doc gives example of requalification process if training has expired
A6 chap 14 A18 Chap 10 and Doc 9284	Dangerous goods training programme for operators approved or not approved to transport DG by air	State of the operator	Recurrent training provided <u>within 24 months</u> (Doc 9284)	Doc 9284 Technical instructions Part 1 Chapter 4

1.4 Flight dispatchers

The NAA has to approve the Method of control and supervision of the operator (A6 §10.1) and the flight dispatchers have then to be licensed in accordance with Annex 1. The operator is responsible for the recurrent training of its flight dispatchers on a periodicity determined in the training programme. Annex 6 mentions explicitly **the qualification flight that a flight dispatcher shall take in the preceding 12 months.**

<i>Reference</i>	<i>Designation of the requirement</i>	<i>Responsibility</i>	<i>Validity/duration</i>	<i>Comments</i>
A6 10.3 b)	Flight dispatcher training and one-way qualification flight in the crew compartment in the <u>preceding 12 months</u>	Operator, under the supervision of the State of the Operator	Validity in the preceding 12 months	Training Manual (<i>Doc 7192</i>), <i>Part D-3 — Flight Operations Officers/Flight Dispatchers.</i>

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Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A6 chap 14 A18 Chap 10 and Doc 9284	Dangerous goods training programme for operators approved or not approved to transport DG by air	State of the operator	Recurrent training provided <u>within 24 months</u> (Doc 9284)	Doc 9284 Technical instructions Part 1 Chapter 4

2. Maintenance

To ensure the continuous airworthiness of its fleet, the air operator has to establish a Maintenance control manual (acceptable to the State of Registry A6 §8.2.1), a maintenance programme (approved by the State of Registry A6 8.3.1), makes arrangement (or have its own) aircraft maintenance organization (A6 §8.1.2 and §8.7) with appropriate maintenance personnel, the one signing the maintenance release licenced in conformity with Annex 1 §4.2.

During the COVID 19 crisis, as many aircraft were grounded, the maintenance of aircraft may have been reduced to minimum. The quality system of the maintenance organization should not be completely stopped but some internal or subcontractors audits may had to be postponed. **The air operator and the maintenance organization should take all necessary measures to ensure safety and conformity to regulations. However some deadlines may fall during the period.** The NAA may take derogations/deviation to extend some period of validity as some licence may expire, some maintenance tasks may not be realized on time, the airworthiness certificate may expire etc..

Annex 8 Part II 3.2.3 A Certificate of Airworthiness shall be renewed or shall remain valid, subject to the laws of the State of Registry, provided that the State of Registry shall require that the continuing airworthiness of the aircraft shall be determined by a periodical inspection at appropriate intervals having regard to lapse of time and type of service or, alternatively, by means of a system of inspection, approved by the State, that will produce at least an equivalent result.

The Maintenance organization has to be approved in accordance with Annex 6, Part I, 8.7 or the aircraft are maintained and released to service under an equivalent system, either of which is acceptable to the State of Registry. **The Approved Maintenance Organization (AMO) is required to have a SMS (A6 8.7.3.1 and A19 3.3.2.1) which should be used to assess the risks implied by the Covid-19 break and to implement adequate safety actions.**

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Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A6 8.3.1 A8 10.3	Maintenance tasks performed in conformity with the Maintenance programme	Approved by the State of Registry; acceptable to the State of the Operator	Maintenance tasks shall respect intervals	
A8 PII Chap 3	Certificate of airworthiness (CoA)	Issued and renewed by the State of registry	Depending if the State writes on the CoA a periodic endorsement (giving date of expiry) or a statement that the aircraft is being maintained under a system of continuous inspection.	Doc 9760 §4.6
A6 8.7	Maintenance organization approval	State of the organization together with State of registry	Validity as decided by the State	Doc 9760 Part III Chap 10
A1 4.2 A6 8.7.6.3	Aircraft maintenance licence; To sign a maintenance release: recent experience in the last 24 months	Licence holder and/or its employer	Recent experience in the last 24 months	Recent experience detailed in A1 4.2.2.2 c)
A6 8.7.6.4	Continuation training for maintenance personnel	Training programme of the maintenance organization	Validity depending on the State regulation	Doc 9760 10.7.2

Other regulatory items are not listed here but may be concerned by a deadline during the COVID 19 crisis and have to be addressed by the organization: mass and balance report (periodicity depending on national regulation Doc 9760 PIII §7.6.2), calibration of tools and equipments etc.

3. The safe transport of dangerous goods by air

As mentioned before, the operator is responsible to provide recurrent training on the safe transport of dangerous goods by air to its personnel, in accordance with the Technical Instruction (Doc 9284) whether it is authorized or not to transport such goods (Annex 18 10.1). Chapter 4 of Doc 9284 Part 1 list all the persons concerned by Dangerous Goods training:

- a) shippers of dangerous goods, including packers and persons or organizations undertaking the responsibilities of the shipper;*
- b) operators;*
- c) ground handling agencies which perform, on behalf of the operator, the act of accepting, handling, loading, unloading, transferring or other processing of cargo or mail;*
- d) ground handling agencies located at an airport which perform, on behalf of the operator, the act of processing passengers;*
- e) agencies, not located at an airport, which perform, on behalf of the operator, the act of checking in passengers;*
- f) freight forwarders;*
- g) agencies engaged in the security screening of passengers and crew and their baggage and/or cargo or mail; and*
- h) designated postal operators.*

Personnel must be trained in the requirements commensurate with their responsibilities, as detailed in the Tables available in the Technical instructions which precise:

4.2.3 Recurrent training must be provided within 24 months of previous training to ensure knowledge is current. However, if recurrent training is completed within the final three months of validity of previous training, the period of validity extends from the month on which the recurrent training was completed until 24 months from the expiry month of that previous training.

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All the dangerous **goods training that were postponed due to the Covid 19 Crisis should be rescheduled in order to be in compliance with the regulation.**
The NAA may decide to extend some validity.

Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A6 chap 14 A18 Chap 10 and Doc 9284	Dangerous goods recurrent training, as appropriate to each personnel	Depending on the personnel	Recurrent training provided within 24 months (Doc 9284)	Doc 9284 Technical instructions Part 1 Chapter 4 tables

4. Medical Assessment and Medical examiners

4.1 Medical assessment

As mentioned before for Flight crew and below for Air traffic controllers, a medical assessment, provided by a medical examiner, applies for licence holders as follow:

Ref A1 6.1.1:

Class 1 Medical Assessment; applies to applicants for, and holders of:

- commercial pilot licences — aeroplane, airship, helicopter and powered-lift
- multi-crew pilot licences — aeroplane
- airline transport pilot licences — aeroplane, helicopter and powered-lift

Class 2 Medical Assessment; applies to applicants for, and holders of:

- flight navigator licences
- flight engineer licences
- private pilot licences — aeroplane, airship, helicopter and powered-lift
- glider pilot licences
- free balloon pilot licences

Class 3 Medical Assessment; applies to applicants for, and holders of:

- air traffic controller licences

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Annex 1 §1.2.5.2 defines the validity of these medical assessments, and the reduction of periodicity for licences holders over a certain age. The licence holders (and their employers) are responsible to ensure their **medical assessment is still valid to exercise the privileges of their licence**. Because of the distancing measures taken during the COVID 19 crisis, the NAA may decide to extend some validity depending on the activity and age of the licence holder. It could also help medical examiners to catch up by spreading appointments. In the regulation, extension of validity of medical assessment is only possible up to 45 days (A1 1.2.4.4.1). Moreover, if the licence holder is operating in an area distant, there is a possibility of deferral of medical assessment (A1 1.2.5.2.6), but this requirement is not a major help in the case of Covid 19 crisis.

<i>Reference</i>	<i>Designation of the requirement</i>	<i>Responsibility</i>	<i>Validity/duration</i>	<i>Comments</i>
A1 1.2.5.2	<u>Validity of medical assessment</u> — 60 months for the private pilot licence — aeroplane, airship, helicopter and powered-lift; — 12 months for the commercial pilot licence aeroplane, airship, helicopter and powered-lift; — 12 months for the multi-crew pilot licence aeroplane; — 12 months for the airline transport pilot licence aeroplane, helicopter and powered-lift; — 60 months for the glider pilot licence; — 60 months for the free balloon pilot licence; — 12 months for the flight navigator licence; — 12 months for the flight engineer licence; — 48 months for the air traffic controller licence;	Licence holder	Depending on the licence and the age of the holder (see below)	
A1 1.2.5.2.2	- airline transport pilot licences — aeroplane, helicopter and powered-lift, - commercial pilot licences — aeroplane, airship, helicopter and powered-lift,	Licence holder	Valid 6 months if more than 40	

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Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
	in <u>single-crew</u> commercial air transport operations carrying passengers passed their 40th birthday the period of validity shall be reduced to six months .			
A1 1.2.5.2.3	- <u>airline transport pilot licences</u> — aeroplane, helicopter and powered-lift, - <u>commercial pilot licences</u> — aeroplane, airship, helicopter and powered-lift, - <u>multi-crew pilot licences</u> — aeroplane, In commercial air transport operations, passed their 60th birthday , the period of validity shall be reduced to six months .	Licence holder	Valid 6 months if more than 60	
A1 1.2.5.2.4	- <u>private pilot licences</u> — aeroplane, airship, helicopter and powered-lift, <u>free balloon pilot licences</u> , <u>glider pilot licences</u> - <u>air traffic controller licences</u> passed their 40th birthday , the period of validity shall be reduced to 24 months .	Licence holder	Valid 24 months if more than 40	
A1 1.2.4.4.1	The period of validity of a Medical Assessment may be extended, at the discretion of the Licensing Authority, up to 45 days .	Licensing Authority	Possibility of extension up to 45 days	In some States the extension is already included in the validity of their medical assessment

It should be noted that Annex 1 gives clear responsibility to a licence holder *to not exercise the privileges of their licences and related ratings at any time when they are aware of any decrease in their medical fitness which might render them unable to safely and properly exercise these privileges (A1 1.2.6.1)*; Annex 1 chapter 6 and Doc 8984 Manual of Civil Aviation Medicine give details on the content of each medical examination and, as an example, §6.3.2.9 emphasizes that *there shall be no acute disability of the lungs nor any active disease of the structures of the lungs, mediastinum or pleurae likely to result in incapacitating symptoms during normal or emergency operations*.

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The NAA should raise awareness of licence holders on the impact of Covid 19 for the safety of operations.

4.2 Medical examiners and Assessor

As mentioned before, the medical examiners are designated by the NAA to perform the medical assessment. The Doc 8984 Manual of Civil Aviation medicine describes the content of the medical examinations. It also highlights the refresher training that medical examiners shall receive at regular intervals (A1 1.2.4.6.1). Intervals and content of refresher training are defined by the NAA, to ensure the medical examiners keep practical knowledge and experience of the conditions in which the holders of licences and ratings carry out their duties.

The Medical Assessors, employed or contracted by the NAA, have no requirements for refresher trainings. However, as the physicians evaluating the medical reports submitted to the medical examiners (A1 1.2.4.9), Doc 8984 1.2.14 states *that they should have advanced training in the specialty of aviation medicine and extensive experience in regulatory and clinical civil aviation medicine. The audit of medical reports by designated medical examiners and refresher training of medical examiners will usually fall within the remit of the medical assessor.* **The NAA and its medical assessors should work with the designated medical examiners to evaluate the impact on safety of the health of licences holders after COVID 19.**

Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A1 1.2.4.6.1	Refresher training at regular intervals of Medical examiners	State of establishment	Intervals depending on the State regulation	A1 1.2.4.6.2 note and Doc 8984 Part 1 1.2.12

5. Approved Training Organization and FSTD Approvals

5.1 Approved training organization

A1 1.2.8.3 Approved training for flight crew and air traffic controllers shall be conducted within an approved training organization.

Note.— The approved training considered in 1.2.8.3 relates primarily to approved training for the issuance of an Annex 1 licence or rating. It is not intended to include approved training for the maintenance of competence or for an operational qualification after the initial issuance of a licence or rating, as may be required for air traffic controllers or for flight crew, such as the approved training under Annex 6 — Operation of Aircraft, Part I — International Commercial Air Transport — Aeroplanes, 9.3, or Part III — International Operations — Helicopters, Section II, 7.3.

A1 1.2.8.4 Until 2 November 2022, competency-based approved training for aircraft maintenance personnel shall be conducted within an approved training organization.

Annex 1 Appendix 2 states that the validity of the approval of a training organization depends on the State requirements. Doc 9841 Manual on the approval of Training organization mentions that some States issue a training organization approval that contains an explicit period of validity while others issue an open-ended approval that remains valid as long as the conditions under which the approval has been granted are fulfilled.

In addition, Annex 19 explicitly requires an SMS for approved training organizations in accordance with Annex 1 that are exposed to safety risks related to aircraft operations during the provision of their services. **The surveillance of the ATO by the NAA should be adapted during the COVID 19 crisis, and using its SMS the ATO, together with the NAA, should assess the impact on safety.**

Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A1 1.2.8.3	Renewal of Training Organization Approval	State of the ATO	Validity depending on the State regulation	Doc 9841

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5.2 Instructors and Evaluators

There is no explicit requirement of recurrent training for instructors or evaluators in Annex 1. However, Doc 9841 §1.3.6 introduces that **instructors and evaluators are expected to undergo initial training and recurrent training at intervals that the Licensing Authority deems necessary**. In addition, Doc 9841 §7.3.3 states that *besides training its regular staff, ATOs should ensure that refresher training is implemented on a scheduled basis for part-time or temporary instructional personnel prior to commencing their duties after a specified period of inactivity. Re-familiarization with the ATO's quality system and expected levels of service should be included in this training scheme.*

5.3 Flight Simulation Training Device (FSTD)

A1 2.1.6

The use of a FSTD for acquiring the experience or performing any manoeuvre required during the demonstration of skill for the issue of a licence or rating shall be approved by the Licensing Authority, which shall ensure that the FSTD used is appropriate to the task.

The approval of FSTD is also mentioned in Doc 9841 Manual on the approval of Training organization §6.3.2, completed by Doc 9625 Manual of Criteria for the Qualification of Flight Simulation Training Devices, which stipulates in §2.11.6 that a system of periodic evaluations should be established to ensure that FSTDs continue to maintain their initially qualified performance, functions and other characteristics. **The NAA having jurisdiction over the FSTD should establish the time interval between the recurrent evaluations.**

Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A1 2.1.6	Renewal of FSTD approval	State of the ATO	Validity depending on the State regulation	Doc 9625

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6. Language proficiency

Annex 1 requires demonstrating some licence holders their ability to speak English in the radiotelephony communications. This requirement is only for licence holders for which the language used is not the native language (English most of the time). The minimum ICAO level to exercise is level 4 as determined in Annex 1 Att A and in Doc 9379 Part II Chap 6. Doc 9835 Manual on the Implementation of ICAO Language Proficiency Requirements provides elements on language training and testing. If the licence holder obtains a level 4 or level 5, he has to be evaluated on a regular basis; **the validity of its language proficiency evaluation could end during the Covid 19 Crisis.**

<i>Reference</i>	<i>Designation of the requirement</i>	<i>Responsibility</i>	<i>Validity/duration</i>	<i>Comments</i>
A1 1.2.9 A1 App1	Language Proficiency: for aeroplane, airship, helicopter and powered-lift pilots air traffic controllers, ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1 (ICAO level 4 minimum Att A)	Licence Holder	Validity depending on the level obtained	Below the Expert Level (Level 6) shall be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level. Rec 1.2.9.6 and Doc 9379 Part II 6.2.9: level 4, every 3 years, level 5 every 6 years

7. Air Traffic Controllers

Air Traffic controllers licence is described in Annex 1, together with the ratings associated. There is an explicit requirement on the **period of validity of these ratings, which may be affected during the Covid 19 crisis.**

*4.5.3.4 Validity of ratings
A rating shall become invalid when an air traffic controller has ceased to exercise the privileges of the rating for a period determined by the Licensing Authority. That period shall not exceed six months. A rating shall remain invalid until the controller’s ability to exercise the privileges of the rating has been re-established.*

Recurrent/refresher training of Air Traffic Controller is mentioned in *Doc 9868, PANS-TRG*, the periodicity should be determined by the NAA. Air Traffic controllers can only use the privilege of their licence together with a valid Medical assessment Class 3.

Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A1 4.5.3.4	<u>Validity of ratings:</u> for a period determined by the Licensing Authority. That period shall not exceed six months	Licence holder	Validity as prescribed by the licensing authority, not more than 6 months	
A1 1.2.5.2	<u>Validity of medical assessment</u> — 48 months for the air traffic controller licence;	Licence holder	Validity depending on the licence and the age of the holder (see below)	

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<i>Reference</i>	<i>Designation of the requirement</i>	<i>Responsibility</i>	<i>Validity/duration</i>	<i>Comments</i>
A1 1.2.5.2.4	- air traffic controller licences passed their <u>40th birthday</u> , the period of validity shall be reduced to <u>24 months</u> .	Licence holder	Validity of 24 months if more than 40	
A1 1.2.9 A1 App1	Language Proficiency: for air traffic controllers, ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1 (ICAO level 4 minimum Att A)	Licence Holder	validity depending on the level obtained	Below the Expert Level (Level 6) shall be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level. Rec 1.2.9.6; level 4, every 3 years, level 5 every 6 years

8. List of ICAO documents used or referenced:

Annex 1 Personnel licensing

Annex 6 Operations of aircraft Part I

Annex 8 Airworthiness of aircraft

Annex 18 the Safe Transport of Dangerous goods by air

Annex 19 Safety management

Doc 7192 Part D-3 flight dispatchers - training manual

Doc 8335 Manual of Procedures for operations, inspections, certification and continued surveillance

Doc 8984: Manual of Civil Aviation Medicine

Doc 9284 Technical Instructions for the safe transport of Dangerous goods by air

Doc 9379: Manual of procedures for establishment and management of a State's Personnel licensing System

Doc 9625: Manual of Criteria for the Qualification of Flight simulation training devices

Doc 9760 Airworthiness manual

Doc 9841: Manual on the approval of Training organization

Doc 9859: Safety Management Manual

Doc 9868: PANS-TRG - Procedures for Air Navigation services-training

Doc 10002: Cabin crew training programme

Doc 10011: Manual on Aeroplane Upset Prevention and Recovery Training



FRANCE
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SERVICES

Part II – Aerodromes

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SERVICES

The checklist which will be proposed by the Civil Aviation Authority in the framework of its continuous oversight is intended to help the operator to identify and carry out the necessary actions before restarting or increasing in terms of volume the operation of its aerodrome after a significant reduction in activity. It only addresses safety aspects (no consideration of health and security aspects other than verification of airside access). It has been built using, inter alia, ICAO doc 9981 and a number of existing documents published by ACI, FSF, and EASA as working documents.

In order to approach the restart in the best conditions, this approach of taking into account the risks induced by the period of inactivity will have to be carried out jointly by the aerodrome operator with the civil aviation authorities and the air navigation services.

Since approval of the change is required, it is advisable to keep the Authority regularly informed of the status of the controls and any difficulties that may be encountered. Infrastructure checks and ground aids will be carried out by the operator with the aim of "recertifying" its infrastructure, as the state of the infrastructure is an essential element for recovery.

The actions related to the operating procedures and the operation of the operator's management system listed in this document are essential to actuate the restart. It is therefore advisable, in addition to regular telephone contacts with the Authority, that a meeting be organised by the aerodrome manager with the Authority and the air navigation services shortly before the planned resumption of operations to ensure that all points have been dealt with and that the deadlines envisaged for the resumption are relevant.

The approval of the change shall be effective before publication of the necessary NOTAM and SUP AIP.

1. Resumption of commercial operations at an aerodrome

The resumption of commercial air operations at an airfield whose activity has been reduced or suspended for many weeks or months creates a new, 'abnormal' special situation, thus creating increased safety risks that need to be identified. An analysis of specific risks must therefore be carried out by the airfield operator, in conjunction with the Civil Aviation Authorities responsible for the continuous monitoring of the operator and the air navigation services present at the airfield.

Risk mitigation measures will include audits and controls carried out by the operator, possible implementation of new procedures, training, awareness and communication actions towards staff and third parties prior to the resumption of operations, maintenance actions on critical equipment interrupted, capacity limitations at start-up... The actions decided will be adapted to the infrastructure of the airfield, the organization of the operator and the operating conditions associated with the airfield.

In accordance with the provisions of ICAO Annex 14, for any operator receiving international commercial traffic, this assessment of the change related to the resumption of activity must be carried out within the framework of the operator's safety management system, in coordination with the Authority. This assessment of the change shall be approved. Thus, prior to the effective resumption of operations, in order to approve the operator's approach and to have a common vision on the results of the control actions, a meeting between the Authority, the director of the aerodrome, and the air

navigation services present at the airfield should be organised to ensure that all key points have been identified and studied before the resumption..

To facilitate the analysis, the Authority may consider it interesting to offer operators a generic checklist that takes up the main points deserving of attention and controls by domain. It is not intended to be exhaustive, the operator being in the best position to identify a risk of its own (by its infrastructure or organization, its geographical location, its operating conditions...) and it shall be adapted to the situation of the airfield, especially at the level of activity maintained during the crisis.

The list of areas below is based on the list contained in ICAO PANS-Aerodromes Doc 9981.

Attached to the present document, a practical checklist for airport operations resumption is listing points to be checked in accordance with ICAO references.

These documents have been developed by France Aviation Civile Services to support Authorities and Operators in the situation created by Covid 19.

INFRASTRUCTURE AND GROUND AIDS

OBSTACLES:

- Ensure that there are no new obstacles in and around the right-of-way, including checking that obstacle-limitation surfaces are not breached (OLS and OFZ). If this is the case, have them removed (OFZ) or put in place marks and appropriate aeronautical information (OLS) if necessary, after verifying that the air operations are not compromised. The new obstacles could typically be temporary cranes, masts or trees or crops that have become high....
- Ensure that aircraft that remain parked on stands or condemned during the gradual resumption of operations do not breach obstacle-limitation areas, particularly at the critical areas of navais for active runways.
- Make sure that the marking of all obstacles is visible and works at night.

PHYSICAL CHARACTERISTICS:

- Conduct in-depth inspections of the condition of all paved and unpaved surfaces of the movement area, paying particular attention to the cleanliness of these surfaces and the presence of FODs on areas near runways or taxiways (runway strips, open extension, stop extension, runway end safety zone, taxiway strips, radio-altimeter operating area, pre-threshold area).
- Report any sign of significant surface degradation (material damage or plants, ...) and carry out corresponding repairs. If the necessary repairs are postponed, the affected degraded taxiways and areas will be declared unusable (to be specified in the NOTAM). In the case of minor damage, their evolution will have to be monitored and their repair planned.

- For pavements on which aircraft have been parked for a long period of time, check that they are not sunk or over compacted and that there are no degradations due to possible fluid leakage from aircraft. Perform these audits before the operations resume. Any damage will need to be repaired before the pavements can be used. If repairs are postponed, the affected degraded lanes and areas shall be rendered unusable (to be specified in the NOTAM).
- In general, these in-depth inspections will be carried out in the view that the aerodrome infrastructure shall be 're-certified'.
- For unpaved runways or taxiways, as well as their surroundings, and depending on the condition of the vegetation, cut the grass (and evacuate) and make sure the markings are visible again. If necessary, repair the damage that would have been caused by rain or the presence of animals on the airfield, in the absence of traffic ...
- For all aerodromes concerned by the resumption of operations, the protection of wildlife hazards should take into account the risk of presence of new animals and reinforced runway inspections should be put in place during the recovery period.

ELECTRIC NETWORKS AND VISUAL AIDS:

- In the event of a complete shutdown, check the proper functioning of electrical networks supplying the technical and commercial installations and lighting. These checks will apply to inverters, regulators, automates, and for equipment using batteries, their level of charge, and check in coordination with the air navigation services the proper functioning of the radio and nav aids.
- Verify also the proper functioning of electrical backup (check that the switching time meets the requirements), as well as that of the stop bars if they exist (LVP).

Check:

- the condition of markings, lights, signs and beacons,
- the functioning of the lighting (continuity of the mark-up and dedicated circuit)
- the functioning of stop bars in case of LVP
- the state and functioning of the PAPI (bulbs, intact boxes, no bird's nest..)

These checks will be more or less conducted in-depth depending from aerodrome use and maintenance carried out during the period when the aerodrome's operations have been reduced or suspended.

FACILITIES:

- Check the state of fences, sewerage systems and the presence and condition of wind direction indicators.

NOTAM:

- Issue a NOTAM to specify the operating constraints related to the restart.

SERVICES PROVIDED BY THE OPERATOR

RFFS (Rescue and Fire Fighting Services):

- Fix the level of RFFS protection based on the traffic expected during the resumption and verify that the conditions related to this level are met. If the level of protection changes thereafter, the corresponding checks will be carried out again. Similarly, check that the protective clothing and respiratory equipment provided, the corresponding fire extinguishers, equipment and RFFS vehicles are in well working order.
- Ensure that the pathways used by RFFS vehicles during interventions are well clear of any vehicle or object and allow compliance with the regulatory provisions for response time.
- Test the communication and alert service between the fire station, the control tower and the vehicles to make sure it works.

SPPA (Protection of Wildlife Hazard):

- For all airports affected by the resumption of operations, take into account the risk of 'additional animals' by the SPPA and implement reinforced runways inspections during the resumption period.
- Proceed with an assessment of wildlife developments on the airfield following the suspension or reduction of activity, and to define appropriate scare actions, in anticipation and resumption of exploitation, the possible presence of additional animals on the ground during the inactivity phase being real. As such, check the condition of the fences more often and the analysis of the vicinity of the airfield.

OPERATING PROCEDURES

Some existing operating procedures will need to be adapted and new procedures created to respond to the new risks identified and thus allow the resumption. This section lists the items considered essential for which an Authority approval will be sought. It is not necessarily intended to be exhaustive.

- Based on the overall result of the analysis carried out and for the necessary information to be communicated to the users of the airfield, make sure that the NOTAMs published in the AIP are in line with the operational situation of the airfield in real time.
- Put in place a procedure to carry out in-depth infrastructure checks on the areas where the aircraft were stored before the resumption and then on a regular basis (daily?) when planes are gradually released.

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- If aircraft were to remain temporarily parked on a runway or taxiway, declare them unusable. Similarly, any degraded area that has not been repaired before the resumption of operation will be unusable.
- If necessary, establish and maintain in real time a new airfield traffic plan incorporating these closures (take into account OLS surfaces, critical areas, roads and RFFS exercises to be defined and the risk of runway or taxiway incursions by vehicles or maintenance personnel in particular). Establish the correct marking, and where possible, turn off the corresponding parts of the lighting. The plan must be developed in coordination with air navigation services and must be published in an AIP SUP.
- Similarly, depending on the areas occupied and the recovery being gradual, establish and update a parking plan to know where to park the planes according to their use (short, medium- and long-term parking). Establish this plan in coordination with the third parties concerned and take into account the risks generated by prolonged parking (additional load on the pavements, insufficient distances between aircraft that can generate potential collisions during future movements, clearance needed around the planes for a RFFS intervention, the surfaces of obstacle limitations OLS - are not pierced. ...). Air navigation services will be kept on a regular basis with updates on the changes.
- Set up a specific procedure for planes exiting their off-station parking area, to avoid any potential wing-to-wing collision, and minimize the effects of the blast that could be generated.
- Ensure that the facilities and equipment associated with the refueling are in good working order and that the specifications of the fuel provided are correct.
- Plan maintenance and verification operations in relation to critical equipment (power supply, PAPI, ...) which would have been postponed, and carry them out before the resumption of operation if it was discontinued..
- Check the proper operation of vehicles using batteries and allowed to circulate on the maneuvering area as well as radios.
- Strengthen the first runway and traffic area inspections after restart of operations
- Check with the ground handlers to ensure that their equipment works properly
- For the removal of accidentally immobilized aircraft, check that the equipment and procedures in place are working and are compatible in particular with the new traffic plan put in place if there is any.
- For low-visibility operations, check that the coordination conditions with air navigation services are always met

In general, anticipate an increased internal/external communication with all stakeholders for the definition of these new procedures and to set up a daily feedback to correct reported troubles on some aspects if necessary.

ORGANISATION AND SMS OF THE OPERATOR

The operator will have to incorporate the following elements into its analysis:

In terms of personnel:

- Take into account the recent lack of activity resulting in a deterioration of skills and knowledge of procedures by staff (less rigorous follow-up of procedures).
- Provide training for new developments and raise awareness of new risks.
- Also consider the increased workload on staff present at the resumption of operations.
- Ensure that the workforce will be in relation to the planned recovery activity.

Work resumes and changes in progress interrupted:

- Verify that the assumptions and actions taken during the implementation of these changes are still applicable, if it is not the case, modify them according to the coordination procedures normally established before implementing them. Also check the installation of appropriate markers for work in this new context.

In general, the operator will need to identify all deferred actions and plan their implementation if necessary. These are primarily concerned with the training and maintenance of staff capacity, the possible regulatory compliance actions already identified.

Finally, coordination with third parties should be effective and should also focus first on the new aspects of exploitation.

2. Resumption of commercial operations at an aerodrome and the role of the aerodrome operator

Considering the present sanitary crisis called COVID 19, the present document consists in a wild checklist based on ICAO documentation and dedicated to assist airport managers before normal operations resuming. Moreover this document might be useful for any other specific situation triggered by all sorts of crisis (i.e climate / social /etc...) that could force airport managers to stop or strongly reduce their operational running.

Find below a table of the different domains that could be possibly impacted by a reduction or a total lockdown of the airport daily life. This table is based on all subjects included in the certification scope. For each subject a level of priority is proposed. (High or Low)

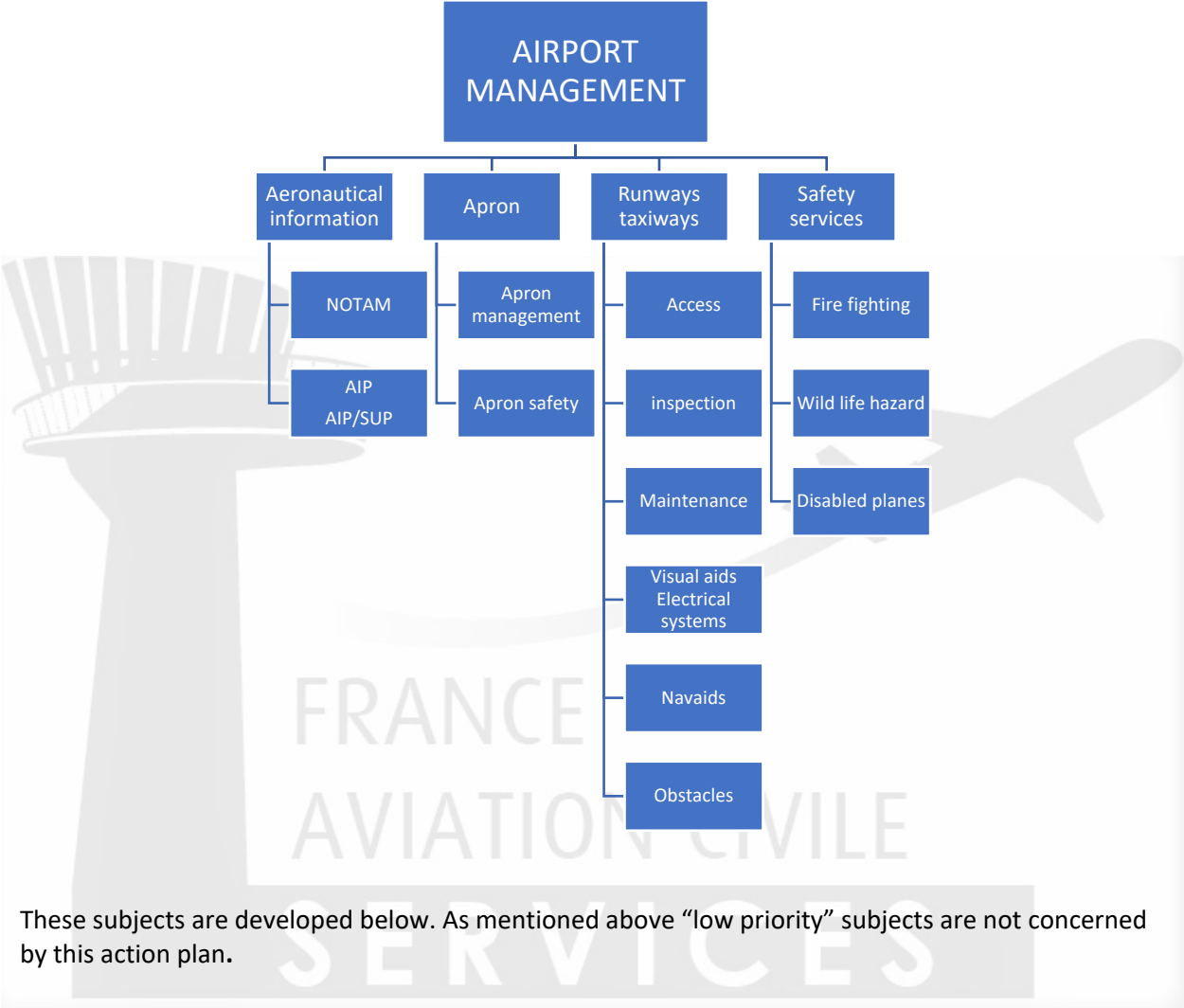
Since the situation requires priorities, we will not consider subjects of “low priority” and only deal with “high priority” subjects.

Subjects	Level of priority
– <i>Aeronautical information and aerodrome data</i>	High
– <i>Access to the movement aera</i>	High
– <i>Aerodrome emergency plan</i>	Low
– <i>Rescue and fire fighting</i>	High
– <i>Inspection of the movement aera</i>	High
– <i>Maintenance of the movement aera</i>	High
– <i>Snow and ice control, and other hazardous meteorological conditions</i>	Low
– <i>Visual aids and aerodrome electrical systems</i>	High
– <i>Safety during aerodrome works</i>	High
– <i>Apron management</i>	High
– <i>Apron safety</i>	High
– <i>Vehicles on the movement aera</i>	High
– <i>Wildlife hazard management</i>	High
– <i>Obstacles</i>	High
– <i>Removal of disabled airplane</i>	High
– <i>Low visibility operation</i>	High
– <i>Dangerous goods management</i>	Low
– <i>Nav aids protection</i>	High

Furthermore it will remain recommended for all staff to respect social distancing as often as possible and for airport operators to provide staff with protecting masks and hydro alcoholic liquid.

2.1 Preparation of action plan

- Prepare an action plan as proposed :



- Establishment of a procedure to conduct thorough infrastructure checks on areas where aircraft have been stored ;
- Information on runways and taxiways that cannot be used due to parked aircraft;
- Establish a new aerodrome traffic plan related to air navigation services + publication in SUP AIP ;
- Establish a parking plan according to the areas occupied in coordination with the third parties concerned and inform the air navigation services ;

- Establish a planning of all necessary maintenance operations and works before the resumption of activity ;
- For operations in low visibility, check that the conditions for coordination with air navigation services are always met;
- Plan a programme of refresher training (after more or less long periods of interruption) on the existing procedures and on the new procedures put in place as a result of the changes made;
- Provide a training programme to maintain staff skills.

2.2 Checklists

2.2.1 Infrastructure and ground aids

✓ **Obstacles** (High priority)

(Ref. ICAO Annex 14)

Check if there is possible new obstacles in the runway obstacle free zone.

If any, check markings and lighting of authorized obstacles, and any new unauthorized obstacles particularly temporary in nature (e.g. mobile cranes) which may impact on the safe operation of aircraft.

If any, notify it by publishing a NOTAM

Aircraft parked on the manoeuvre area do not infringe the obstacle limitation surfaces, the critical and sensitive areas of radio navigation aids serving the active runway(s) and the line of sight of air traffic control. Information on such closed parts of the manoeuvre area is made available through a notice to airmen (NOTAM).

✓ **Physical characteristics**

- Inspection of the movement area (High priority)

(Ref. ICAO Annex 14 and Doc. 9137 Part. 8)

Overall and detailed inspection of the runway(s) and surroundings, taxiways and surroundings, unpaved surfaces

- Overall and detailed inspection of the runway(s), stop ways, clearways, taxiways, surroundings and unpaved surfaces in the vicinity
- No water puddle or liquid leakage

- No foreign object debris
- No obstruction for visibility on markings, panels, lightings
- Flashing lights and visual slope indicator OK
- No unauthorized obstacles in the obstacle free zone
- All means to prevent runway incursion in function (flashing lights/markings)

- Maintenance of the movement area (High priority)

(Ref. ICAO Doc. 9157, Doc 9137 Part.2 and Circular 355)

As a consequence of the overall inspection mentioned above, it might be necessary to start rapidly works or specific repairs as needed. (in application of workings procedures and SMS rules).

Refer to following paragraph "Safety during aerodrome works"

- Safety during aerodrome works (High priority)

(Ref. ICAO Doc 9859)

If corrective or planned works are necessary meanwhile the specific MoU must be applied.

In case of no MoU:

- Publish aeronautical information (NOTAM/AIP)
- Manage safety markings and lightings
- Determine safety risks
- Mitigate safety risks
- Comply with SMS system (Doc ICAO 9859)

- ✓ **Electric network and visual aids** (High priority)

(Ref. ICAO Doc 9154 Part.4, Part.5 and Part.6)

- Check normal power supply and test alternative energy supply (inverter/generator)
- Check all manoeuvre area lightings, markings, signs and wind socks
- Check axis taxiway lighting and runway stopbars (if any)
 - If runway lightings remote is conducted by ATC, all tests will be performed accordingly with the specific memorandum of understanding

- ✓ **Facilities**

- Access to the movement area (High priority)

(Ref. ICAO Annex 17 and Doc 8973)

- Check all gates are properly closed and looked after, all perimeter fences are in good conditions and that any access is secured by staff and tools.
- Check all staff own the right access badge dedicated to their working area
- Check that vehicles are properly equipped and maintained

2.2.2 Services provided by the Operator

✓ **Rescue and firefighting** (High priority)

(Ref. ICAO Doc 9137 Part.1)

Rescue and firefighting level of protection in accordance with expected traffic

Check:

- Staff equipment and training
- Number of available vehicles
- Quantity of extinguishing agent
- Alarm systems for fire notification checked
- Alternative means of alert checked
- Emergency access roads remain cleared for RFF vehicles from the fire station cleared

✓ **Wildlife hazard management** (High priority)

Possible presence of wildlife, which might have increased in the absence of frequent operations; A low air traffic density may have increased the attractiveness of the airport site.

A complete perimeter fence of adequate height is the prime method of preventing hazardous wildlife, other than birds, from gaining access to the airfield areas. Check fences and gates.

Prevent food sources to be available to animals on the airport.

Vegetation composition (grass) should be kept at a height that is considered unattractive to hazardous birds/wildlife. Perform appropriate grass cutting

Ask wildlife control team to increase number of inspections as necessary and to provide airport safety with proactive and reactive actions.

2.2.3 Operating procedures and Other

✓ **Aeronautical information and aerodrome data** (High priority)

(Ref. ICAO Annex 15 and Doc 10066)

AIP general checking

AIP SUP if necessary

NOTAM in activity: still accurate and/or appropriate?

NOTAM to be issued to inform of all changes in airport configuration and airport restriction such as:

- Aircraft start-up
- Taxiing restrictions
- Apron stands availability
- Schedules changes in operations
- Changes in refuelling procedures
- Restrictions on embarking/disembarking passengers
- Possible new working sites on the airport

✓ **Aerodrome emergency plan** (Low priority)

(Ref. ICAO Doc. 9137 Part.7)

✓ **Snow and ice control, and other hazardous meteorological conditions** (Low priority)

(Ref. ICAO Annex 3)

✓ **Apron management** (High priority)

(Ref. ICAO Doc 9157 Part. 2)

- Ask handling companies to check and report staff capability
- Ask handling companies to check and report good functioning of vehicles and tools
- Ask refuelling companies to report about vehicles availability and fuel quality
- Check markings

✓ **Apron safety** (High priority)

(Ref. ICAO Doc 9137 Part.8 and Doc 9157 Part. 2)

- Availability and competency of staff to carry out their tasks and human factor associated risks due to reduced activity levels.

- Facilities and equipment used for aircraft refuelling provide the aircraft with uncontaminated fuel and of the correct specification.
- Provide overall inspection of aprons in terms of markings, pavement integrity.
- Collect FOD and potential obstacles
- Check possible leakages and depressions due to long term parked aircraft
- Check whether aircraft parked on the manoeuvre area do not infringe the obstacle limitation surfaces, the critical and sensitive areas of radio navigation aids serving the active runway(s) and the line of sight of air traffic control

✓ **Vehicles on the movement area** (High priority)

(Ref. ICAO Annex 14)

Availability and competency of staff to carry out their tasks and human factor associated risks due to reduced activity levels.

Check vehicles good functioning

Check radio equipment

✓ **Removal of a disabled aeroplane** (High priority)

(Ref. ICAO Doc 9137 Part.5)

Before resuming operations, check specific procedures about removal of disabled aircraft.

Check availability and capability of the external operator in charge of possible removal.

✓ **Low visibility operations** (Low priority)

(Ref. ICAO Doc 9365)

✓ **Dangerous goods management** (Low priority)

(Ref. ICAO Doc 9365)

✓ **Nav aids protection** (High priority)

(Ref. ICAO Doc.8071)

In accordance with air traffic services specific checks and tests will be performed.

Part III – ANSPs

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Air Navigation Service Providers will in most cases not have stopped operations in the context of the COVID 19 crisis. They will have experienced very significant traffic decreases. Requirements related to ICAO Annex 1 on the validity of licences and qualifications of Air Traffic Controllers, as well as medical certificates, shall be checked according to the particular situations that may have been encountered.

Beyond that, the main impact of the crisis lies, in terms of skills, in the lack of training and confrontation with dense traffic situations over a long period of time. As for pilots and although these obligations are not subject international regulatory standard, it is recommended to proceed to enhanced training of air traffic controllers, a recall of existing procedures and, more generally, after a period of several months of low activity, a gradual resumption of traffic.

As for airlines, the crisis will have a major economic impact on ANSPs, with a net loss of revenue due to the absence of charges and a very gradual recovery thereafter. Nevertheless, ANSPs have the obligation to keep in operation all the infrastructure and services necessary to operate air traffic. It is therefore necessary to establish a plan for prioritizing resources both in terms of human resources and investments or expenditures related to the maintenance and modernization of the technical infrastructure.

1. Air Traffic Controllers

Air Traffic controllers licence is described in Annex 1, together with the ratings associated. There is an explicit requirement on the **period of validity of these ratings, which may be affected during the Covid 19 crisis.**

4.5.3.4 Validity of ratings

A rating shall become invalid when an air traffic controller has ceased to exercise the privileges of the rating for a period determined by the Licensing Authority. That period shall not exceed six months. A rating shall remain invalid until the controller’s ability to exercise the privileges of the rating has been re-established.

Recurrent/refresher training of Air Traffic Controller is mentioned in Doc 9868, PANS-TRG, the periodicity should be determined by the NAA.

Air Traffic controllers can only use the privilege of their licence together with a valid Medical assessment Class 3.

<i>Reference</i>	<i>Designation of the requirement</i>	<i>Responsibility</i>	<i>Validity/duration</i>	<i>Comments</i>
A1 4.5.3.4	Validity of ratings: for a period determined by the Licensing Authority. That period shall not exceed six months	Licence holder	Validity as prescribed by the licensing authority, not more than 6 months	

Reference	Designation of the requirement	Responsibility	Validity/duration	Comments
A1 1.2.5.2	<u>Validity of medical assessment</u> — 48 months for the air traffic controller licence;	Licence holder	Validity depending on the licence and the age of the holder (see below)	
A1 1.2.5.2.4	- air traffic controller licences passed their <u>40th birthday</u> , the period of validity shall be reduced to <u>24 months</u> .	Licence holder	Validity of 24 months if more than 40	
A1 1.2.9 A1 App1	Language Proficiency: for air traffic controllers, ability to speak and understand the language used for radiotelephony communications to the level specified in the language proficiency requirements in Appendix 1 (ICAO level 4 minimum Att A)	Licence Holder	validity depending on the level obtained	Below the Expert Level (Level 6) shall be formally evaluated at intervals in accordance with an individual's demonstrated proficiency level. Rec 1.2.9.6; level 4, every 3 years, level 5 every 6 years

2. Resource prioritization plan

ANSP's resource prioritization plan to address the COVID-19 crisis should take into account several imperatives:

- Maintain Air Navigation services and infrastructure in a state of response to traffic requirements during recovery;
- Ensure regulatory compliance with current standards;
- Consider the likely weakening of the industrial fabric due to the economic impact of the Covid crisis;
- Maintain a modernization and recruitment program sufficient to support long-term operating capacity.

All of these issues need to be the subject of increased attention and a prioritization strategy, based on the characteristics of the country, the traffic handled by the ANSP and its airspace.

If the hypothesis of a weakened level of activity proved to be sustainable, it would probably also be necessary to adapt the operational system and airspace to the reality of traffic.

