

Title:	Opinion and Instruction Document Introduction of enhanced global reporting format (“GRF”) for reporting runway surface conditions and new aeronautical data quality requirements for aerodrome operators
Package Number	0032(b) (2148 Aeronautical Data Quality/Global Reporting Format)
Headline Purpose:	To ensure the Aeronautical Data Quality (“ADQ”) and Global Reporting Format (“GRF”) requirements set out in Commission Delegated Regulation (EU) 2020/2148 of 8 October 2020 (“ CDR (EU) 2020/2148 ”) for aerodromes are introduced into Commission Regulation (EU) 139/2014 as retained (and amended in domestic law) under the European Withdrawal Act 2018 (“ UK Reg (EU) No. 139/2014 ”) as soon as possible in order to comply with relevant ICAO requirements.
Proposed action:	To introduce into UK law those parts of the Implementing Rules included in CDR (EU) 2020/2148 which the CAA considers necessary.

Objective

ADQ

It is the CAA’s opinion that the ADQ requirements set out in [CDR \(EU\) 2020/2148](#) should be introduced into UK law to ensure that aerodrome operators perform their data activities at the required quality level to support the intended use of the data. The data quality requirements are currently included in Regulation (EU) No 73/2010 as retained (and amended in domestic law) under the European Withdrawal Act 2018 (“[UK \(EU\) Reg No. 73/2010](#)”) (known as the ADQ Regulation) but this regulation is to be revoked as set out in the related Opinion and Instruction Document (“OID”) 0032(a) (469 Aeronautical Information). Although the principles which underpin it remain relevant, [UK \(EU\) Reg No. 73/2010](#) is now out of date. It is the CAA’s opinion that [UK \(EU\) Reg No. 73/2010](#) should be revoked and replaced with an updated approach to ensuring that aerodrome operators meet their obligations. However, this new approach will still embody the principles upon which [UK \(EU\) Reg No. 73/2010](#) rested.

GRF

The GRF is a unique reporting system that impacts on all domains within aviation. It is a system that standardises the reporting of the condition of a contaminated runway. It is the CAA’s opinion that the GRF should be introduced in order to: (i) ensure that the UK complies with the relevant ICAO Standards And Recommended Practices (“SARPs”) in accordance with its international obligations; and (ii) to ensure that flight crews are provided with the necessary information in the correct form in relation to runway condition to be able to effect a safe landing.

Background

ADQ

The proposed rules on aeronautical data and aeronautical information will provide a clear regulatory framework for aerodrome operators by introducing into [UK Reg \(EU\) No. 139/2014](#) the latest proposed amendment to ICAO Annex 15 ‘Aeronautical Information Services’ as well as the new Procedures for Air Navigation Services — Aeronautical Information Management (“PANS-AIM”).

At the same time, the CAA has proposed a separate OID 0032(a) (469 Aeronautical Information) in respect of the changes set out in Commission Implementing Regulation (EU) 2020/469 (“[CIR \(EU\) 2020/469](#)”), amending Regulation (EU) No. 2017/373 as retained (and amended in domestic law) under the European Withdrawal Act 2018 (“[UK \(EU\) Reg 2017/373](#)”) to introduce equivalent rules for Air Traffic Management/Air Navigation Services (“ATM”/“ANS”) providers and other parties providing Instrument Flight Rules (“IFR”) data, and revoking [UK \(EU\) Reg No. 73/2010](#) on the quality of aeronautical data

and aeronautical information for the Single European Sky (“SES”). As set out above, [UK \(EU\) Reg No. 73/2010](#) is out of date, and the CAA does not consider it appropriate to maintain two different regulations with overlapping requirements.

GRF

ICAO’s new GRF system is intended to associate aeroplane performance calculations with the actual runway surface conditions in order to mitigate the risk of runway excursions during landing and take-off operations on wet and contaminated runway surfaces.

In this context, relevant provisions were introduced into ICAO Annex 6, Annex 8 and Annex 14, and, consequently, ICAO Annex 3, PANS-Aerodromes (ICAO Doc 9981), PANS-AIM (ICAO Doc 10066) and PANS-ATM (ICAO Doc 4444) were also amended. Due to the COVID-19 pandemic, ICAO postponed the implementation date from 5 November 2020 to 4 November 2021.

It is the CAA’s opinion that the UK should now introduce these requirements into UK law in accordance with its obligations as an ICAO contracting state.

It should be noted that the CAA does not intend to introduce several of the Implementing Rules contained in [CDR \(EU\) 2020/2148](#) (identified more fully below) as the requirement already exists pursuant to [UK Reg \(EU\) No. 139/2014](#) and its associated Acceptable Means of Compliance (“AMC”) and Guidance Material (“GM”).

What legal powers are being used to achieve the change?

Article 39(1)(a) of Regulation (EU) 2018/1139 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018 (“[the UK Basic Regulation](#)”).

Consequence of not making these legislative changes

As a Contracting State to ICAO, the UK adopts into its national law the SARPs produced by ICAO. Should any State not implement the GRF requirements at the required time, operators would not understand the meaning of the Runway Condition Code and what they should be doing to ensure a standardised response. This would have an immediate impact on airlines flying into UK. Flight crews would expect the runway surface condition to be transmitted in a form they understand and can act upon to ensure the aircraft completes a safe landing.

The UK has had a significant role in developing the GRF. Some States have decided to implement the requirements prior to the ICAO implementation date, therefore publication of the proposed requirements in the UK would not be unexpected.

Furthermore, if legislative changes related to aeronautical data quality were not made, the UK would be misaligned with the other ICAO Contracting States and would be required to file a difference with ICAO that would lead to reputational and practical implications.

The UK would also miss the opportunity to tailor data quality requirements to stakeholders’ needs (in this case aerodrome operators and parties acting on behalf of the aerodrome operators) and apply a level of flexibility in the form of AMC/GM which the current law (in the form of [UK \(EU\) Reg No. 73/2010](#)) cannot offer.

Affected Law (and, if applicable, UK AMC)

What is the existing UK legal framework which is relevant here?	UK Reg (EU) No. 139/2014
Identify the law that the CAA proposes be changed	To amend UK Reg (EU) No. 139/2014 in accordance with the amendments set out in CDR (EU) 2020/2148 to the extent considered appropriate by the CAA.
Are any consequential amendments needed to other pieces of law?	As set out above, the CAA has proposed related amendments to UK (EU) Reg 2017/373 which are covered in a separate OID 0032(a) (469 Aeronautical Information) relating to CIR (EU) 2020/469 .