European Commission policy initiative on aviation safety and a possible revision of Regulation (EC) No 216/2008

RELATED A-NPA 2014-12 — RMT.0613 — 13.3.2015

EXECUTIVE SUMMARY

This Opinion supports a European Commission policy initiative whose aim is to improve the performance of the European Union (EU) aviation system. To this end, this Opinion identifies the most appropriate ways to update Regulation (EC) No 216/2008 (the EASA Basic Regulation) in order to make it best respond to changes in the aviation environment and subsequent challenges to its safety. The Opinion is based on a variety of established, high-level policies and technical deliberations that took place over the last years and identified current issues and possible areas for improvement. Recent accidents underline the need to further strengthen the EU aviation safety system.

To this end, the aviation community was invited to contribute both to a European Commission public consultation and the parallel EASA public consultation via the Advance Notice of Proposed Amendment (A-NPA) 2014-12. Inputs to this A-NPA are reflected in this Opinion.

In line with the approach presented in the A-NPA, this Opinion remains at high, generic policy level and, therefore, does not contain any draft legal text. It addresses the areas of potential change, which were presented in the said A-NPA.

The Opinion concludes in suggesting a variety of changes to the respective technical fields. However, many of those technical fields, while being significant and important — like the performance-based approach, safety training, and environmental protection —, will lie mainly outside the scope of the Basic Regulation.

In the narrow sense of the revision of the Basic Regulation, the Opinion suggests proceeding with the most significant changes with the aim to further streamline and 'defragment' the existing framework, where necessary, in the following domains:

— General Aviation changes according to the General Aviation Road Map results,

— optional and partial inclusion of State services,

— Annex II adjustments,

— security aspects subject to existing EU competency,

— provisions to be addressed to Ground Handling Service Providers,

— consolidation of role in Single European Sky matters,

— role in research coordination,

— efficient use of available resources and sustainable funding solutions.

Applicability		Process map	
Affected regulations and decisions:	Regulation (EC) No 216/2008	Publication date of A-NPA:	23.5.2014
Affected stakeholders:	National Aviation Authorities; aviation industry; passengers	Duration of A-NPA consultation:	3 months
Driver/origin:	European Commisssion road map 'Policy initiative on aviation safety and a possible revision of Regulation (EC) No 216/2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency'	Publication date of the Opinion:	2014/Q4
Reference:	http://ec.europa.eu/smart-regulation/impact/planned_ia/docs/2015_move_001_revision_easa_regulation_en.pdf		

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1. What led to this Opinion

This Opinion supports the European Commission's policy initiative whose aim is to improve the performance of the EU aviation system. To this end, this Opinion identifies the most appropriate ways to update the EASA Basic Regulation in order to make it best respond to the changing aviation environment as well as to recent accidents and the subsequent challenges they represent for aviation safety. It is based on a variety of established, high-level policies and technical deliberations that took place over the last years and identified current issues and possible areas for improvement.

To this end, the aviation community was invited to contribute both to the European Commission's public consultation[1] and to the parallel EASA public consultation via A-NPA 2014-12[2].

About 6 000 contributions to the A-NPA have been made by the aviation community. They indicated the high level of importance and significance of the matters at stake, and focussed equally on all different fields. A dedicated EASA team assessed these contributions thoroughly in order to identify proposals, new ideas, and the course of action to be taken.

EASA wishes to express its gratitude to all the contributors whose responses and comments proved highly instrumental in this regard.

This Opinion is based on the aforementioned exercise, it reflects the main contributions and the EASA's proposal on the way forward for each technical subject, and uses the same breakdown of seven main areas as it was done in the A-NPA, that is:

— performance-based and integrated approach to safety,

— modernising and updating the EASA's remit,

— revisiting the EASA's safety remit,

— optimising the use of available resources,

— ensuring an adequate and stable EASA funding,

— further integration of aviation aspects, and

— aviation regulation beyond the current facets.

Once again — and in line with the approach presented in the A-NPA — this Opinion remains at high, generic policy level and, therefore, does not contain any draft legal text.

This Opinion will form part of the European Commission's initiative to establish a regulatory proposal for the revision of the Basic Regulation. EASA will be involved in this further process and will contribute to the detailed development and amendment of the respective legal text.

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[1] http://ec.europa.eu/transport/modes/air/consultations/2014-aviation-safety_en.htm

[2] http://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2014-12

2. Outcome of the consultation and EASA recommendations

Below, in mirroring the technical subjects as presented in the A-NPA, a precis is provided of the stakeholders' comments and responses to the A-NPA questions and, as applicable, comments have been responded to by EASA. Based on that, the main deductions are presented and identified actions per field are proposed.

2.1. Performance-based and integrated approach to safety

2.1.1. Reinforcing the performance-based approach

Summary of the comments received

The analysis of the comments revealed different levels of understanding and expectations among stakeholders; even within the same stakeholder group, different views were expressed on what 'performance-based' means and how it should apply.

A number of commenters insist on the need to first consolidate the existing regulatory system and address its weaknesses before implementing a new approach. In particular, General Aviation (GA) stakeholders claim that the discussion on 'prescriptive' versus 'performance-based' is of secondary importance, while addressing the increased complexity, uniform interpretation and application of existing rules should be the main issue.

Nevertheless, the majority of the stakeholders generally adhere to the principles and objectives of Performance-Based Regulation (PBR) as they see that compliance with detailed technical or prescriptive standards per se will be less and less effective to ensure a satisfactory level of safety in all cases.

Many commenters stress that two **essential preconditions** need to be met for the effective implementation of PBR. Firstly, the implementation of Safety Management Systems (SMSs) across all domains, based on common SMS design standards, supported by an effective just culture environment. Secondly, a mature European aviation regulatory system, including effective management systems for authorities as well as a mature safety culture throughout the system. **Further preconditions** identified by stakeholders include training, adequate resources for Competent Authorities (CAs), and pertinent safety performance indicators to measure safety and environmental performance, all developed in close cooperation with industry.

Moreover, commenters recommend a progressive and proportionate approach by gradual transition towards PBR. A number of stakeholders caution that the implementation of PBR will be more resource-intensive and will negatively affect safety, international harmonisation and level playing field.

The majority of commenters stress that the prescriptive rule system should be kept and only be complemented by PBR. Some are of the opinion that for certain organisations, like new market entries, small or less mature organisations (with or without effective SMS), mainly prescriptive rules should apply.

Proposed way forward

Keeping in mind that the existing regulatory framework already includes a number of performance-based elements, EASA agrees with the stakeholders' view that PBR should not totally replace the

prescriptive elements of the framework but should rather gradually complement them further or possibly replace them where appropriate.

In order to create a performance-based environment[3], standardisation, training and oversight will need to evolve in parallel with an increased focus on the achievement of safety objectives rather than on the method followed to achieve them. As part of the change management, homogeneous implementation of the applicable regulations has to be ensured.

The gradual process for the PBR introduction to complement or replace prescriptive rules should encompass the following main steps:

— Further supporting the implementation of SMS and State Safety Programme (SSP) through the enactment of the European Aviation Safety Plan (EASp) in the EASA Basic Regulation;

— Identifying key areas suitable for PBR[4].

For these key areas, the existing prescriptive rules should be progressively reviewed to assess whether they are efficient, should remain, or could be either complemented or replaced by PBR. Throughout this process, proper change management, including communication and training, should be ensured.

As far as the Basic Regulation is concerned, in order to facilitate the introduction of PBR, EASA proposes to:

— adapt the existing wording of the core articles and Essential Requirements (ERs) to more explicitly support performance-based rules and oversight;

— add enabling provisions to the Basic Regulation related to a possible future introduction of 'safety performance schemes';

— add an obligation for the Member States to implement SSPs; and

— introduce the concept of EASp and European Aviation Safety Programme (EASP).

2.1.2. Strengthening EASp, safety analysis and reporting

Summary of the comments received

There is a consensus among stakeholders on the fact that the Basic Regulation should give EASA a clear mandate on the EASp, and that the EASp should thus be given a legal status.

A majority of stakeholders (National Aviation Authorities (NAAs) and industry) consider that the EASp should not be mandatory. Member States should have the discretion to include or not EASp actions into their SSPs, acknowledging nevertheless the fact that there is little interest in having a plan which is not followed by anybody except EASA. Other stakeholders consider that the EASp should be mandatory, and among these some consider that it should only be made mandatory if a robust process to develop the EASp is put in place (hereby referring to the issues of transparency, stakeholders' involvement, and evidence-based processes).

Most comments focus on the EASp development process and request more transparency and more involvement of the interested parties (NAAs and industry). There is also consensus that the EASp activity should be more evidence-based and rely upon safety data analysis.

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3   http://easa.europa.eu/newsroom-and-events/general-publications/harmonised-european-approach-performance-based-environment

4   For General Aviation, the way forward should be considered as part of the GA Road Map. See Section 2.2.1.

A number of commenters also pointed out that the rulemaking priorities should derive more clearly from the EASp priorities.

Proposed way forward

Based on the aforementioned and on the considerations in the A-NPA, the Basic Regulation should give EASA a clear mandate to adopt and update the EASp, and thus the EASp should be given legal status. Once this is established, the application of the EASp should not be mandatory for Member States, it should be of recommendatory status instead, as their SSPs may identify other priorities. It would nevertheless be requested from Member States to explain why actions identified in the EASp do not apply to them.

As regards safety analysis, the current Basic Regulation as well as Regulation (EU) No 376/2014 on occurrence reporting[5] provide a sufficient legal basis for safety analysis activities. This Regulation includes the requirement for the EASA Annual Safety Review, and mentions the EASp as a vehicle to implement the results of data analysis at European level.

The EASp should be established in a transparent manner including the involvement and consultation of EASA stakeholders (NAAs, National Supervisory Authorities (NSAs) and industry). The EASp process should be evidence-based, data-driven, and should take due consideration of Regulation (EU) No 376/2014.

In a wider context, and given the remit of EASA, including the need to meet environmental objectives, the development of a European <u>Aviation</u> Plan should be considered in order to consolidate the different activities of EASA (see Section 2.3.1.).

2.1.3. Training: An integrated approach

Summary of the comments received

This subject attracted a particularly high level of attention and comments during the A-NPA consultation. Overall, comments pointed to the importance of proper and high-standard training in the affected sectors (both at authority and industry level), as well as of its harmonisation.

Emphasis is put on the understanding that significant aspects of this subject and its challenges may go beyond the EASA remit, and are rather impacted on by social, market development and other criteria (such as the availability of qualified workforce for different industry segments, and the overall reduction in the number of young aviation talents).

With the broad fields addressed by this subject, and with answers highly diverging due to the different perspectives taken by the commenters (commercial operators, authorities, GA stakeholders), no clear and preferred course of action could be directly derived from the consultation.

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[5] Regulation (EU) No 376/2014 of the European Parliament and of the Council of 3 April 2014 on the reporting, analysis and follow-up of occurrences in civil aviation, amending Regulation (EU) No 996/2010 of the European Parliament and of the Council and repealing Directive 2003/42/EC of the European Parliament and of the Council and Commission Regulations (EC) No 1321/2007 and (EC) No 1330/2007 (OJ L 122, 24.4.2014, p. 18).

Proposed way forward

EASA fully supports the stakeholders' views as regards the paramount importance of high-quality training. This can be largely achieved by non-regulatory means, but requires significant and coordinated efforts by EASA, its Member States and the industry alike.

Efforts should focus on facilitating both an adequate level of accessible training as well as warranting its quality. EASA should assume a key role in ensuring this.

As already launched by EASA, the EASA Virtual Academy is a first step to contribute to this by ensuring that harmonised and high-quality training is available especially to NAA staff. The EASA Virtual Academy should be formalised by including a specific provision in the Basic Regulation.

The EASA Virtual Academy shall offer training which will be provided by qualified external training providers selected through an adequate accreditation procedure. Training will mainly aim to improve the qualifications of personnel involved in the approval and oversight activities of the Member States' NAAs.

An equivalent approach could be envisaged to address industry needs as regards qualified staff.

Furthermore, EASA should support the efforts towards high-quality training by developing and implementing a quality label in close cooperation with the Members States and the industry. For the benefit of EU citizens travelling worldwide, the EASA's qualified training should be made available globally.

2.2. Modernising and updating the EASA's safety remit

2.2.1. A more proportionate system: Implementing the General Aviation Road Map

Summary of the comments received

The feedback received indicates that the current EASA regulatory system puts an excessive, unnecessary administrative and financial burden on the maintenance and operation of light aircraft. Regulatory activity should depart from the current philosophy of applying Commercial Air Transport (CAT) rules to GA. GA comprises a wide range of operations and aircraft types, each with different risk levels, calling for tailor-made regulations to reflect the operational specificities of the sector. Generally, EASA should regulate only where there is a genuine safety need based on evidence and identified risks. Risks should be considered in respect to the nature of the activity concerned, its complexity, and the size of the organisation. GA does not have the appropriate support and organisational structure to keep up with frequent changes in the rules, which take away time from senior aviation personnel to engage and oversee performance, and manage safe operations.

Specifically, the commenters representing the 'sailplane' and 'balloon' interests indicate, while recognising the positive effects of the EASA system, that they suffer most from the current rules and ask specifically for a dedicated approach towards these two aviation communities.

Overall, the majority of the commenters applaud the new emphasis that EASA places on simplified rules for GA and strongly support the implementation of the GA Safety Strategy/Road Map. They believe that these plans will address most of the operational issues raised; yet, targeted action is also required in the adjustment of the Basic Regulation, mainly with regard to definitions, in order to create a more proportionate regulatory safety regime at all levels for GA across Europe. With the GA Road

Map, they already see a positive trend and even encourage EASA to be more innovative in its working approaches. They wish the GA Road Map measures to be delivered at faster rate to address the acute issues that GA is facing.

Proposed way forward

EASA agrees with the stakeholders' recommendations to continue the implementation of the GA Road Map. This is considered to provide a better tailored and proportionate approach to GA and thus to also address the concerns expressed by the glider and balloon communities.

In order to enable the implementation of the GA Road Map, the Basic Regulation needs to be adjusted. Changes are proposed in the following areas:

— Simplification of the airworthiness certification and oversight system for small, low-risk GA by using industry standards endorsed by EASA.

— Introduction of the necessary flexibility for the certification and oversight of small, low-risk GA by allowing the CAs of the Member States (NAAs) and EASA to delegate oversight and certification responsibilities or tasks to approved third parties (user organisations, federations, associations).

— Introduction of the necessary flexibility for small, low-risk GA as well as for Remotely Piloted Aircraft Systems (RPASs) by introducing provisions which will allow possible deviations from existing requirements, where appropriate.

— Inclusion of all RPASs in the scope of the Basic Regulation and establishment of proportionate, risk-based provisions for all RPASs.

— Adjustment of the definitions of 'commercial operation' as well as 'complex motor-powered aircraft', as they are currently creating difficulties for GA.

The principal scope of Annex II should be left unchanged, and only some minor adjustments (e.g. glider definition) are needed, albeit with more flexibility (see Section 2.2.3).

2.2.2. Regulation of State services

Summary of the comments received

The vast majority of the commenters see the need for changing the current approach vis-à-vis the so-called State services. They believe that harmonisation and safety will be better addressed when State services, or certain aspects thereof, are included in the scope of the Basic Regulation. Also other non-safety-related aspects are mentioned in favour of including State services in the scope of the Basic Regulation, such as reduction of administrative burden on industry, reduction of rules for operators using aircraft for both civil and state purposes, simplification of quality management systems, facilitation of the exchange of products and spare parts, and mutual recognition of aircrew and maintenance licences. Additionally, it is assumed that commercial possibilities will significantly increase as trading of aircraft will be largely facilitated when maintained in accordance with EU rules.

Most comments indicate that <u>military</u> services should remain under national responsibility.

The majority favours the idea to prioritise <u>initial and continuing airworthiness</u> for inclusion in the Basic Regulation, in particular in case of aircraft and parts already been granted an EASA type certificate or approval, and for aircraft operated for both commercial and state purposes.

Although opinions on <u>flight crew licensing</u> diverge to some extent, the majority of the commenters advise to also include this subject in the scope of the Basic Regulation.

With regard to <u>air operations</u>, the majority's view is that the air operation rules are unlikely to be appropriate for State services given the nature of these services; yet, the proposed ways forward differ. Some believe that the operational aspect of State services should be kept under national legislation, whereas others believe that the EU operational rules should be applied but Member States should be given the possibility to deviate by regulating certain aspects of it, and some propose to amend Part-SPO to cater for State services as well.

Finally, it is the majority's view to leave inclusion to the discretion of the Member States to choose which regime to apply by creating an 'opt-in' possibility.

Proposed way forward

'Opt-in of State services' — In principle, an optional/voluntary inclusion of State services in the scope of the Basic Regulation should be made possible for all such services. Against this background, it should be considered to develop criteria under which EASA could accept or refuse the inclusion of certain services or areas in the scope of the Basic Regulation, if so requested by a Member State.

'(Continuing) airworthiness and aircrew' — In line with the majority's view, EASA believes that the common EU rules for (continuing) airworthiness and aircrew could also be applied to State services. Obviously, there is task-specific equipment and/or instruments needed for which no requirements exist at EU level. Yet, this should not hinder employment of aircraft and pilots in these services, with certain exceptions, subject to CAs opting for common EU rules. In particular, for aircraft which are granted an EASA type certificate or which are 'grandfathered' in accordance with EU rules, an opportunity should be created to maintain these aircraft in the scope of Commission Regulation (EC) No 2042/2003[6].

In the same way, there should be the option for personnel operating these aircraft to be licensed under Part-FCL (e.g. trained by approved training organisations, including the use of flight simulators).

Apart from the possible positive safety effects, also other positive side effects are expected for industry, i.e. the free movement of persons, goods and services will be facilitated. It will be, for example, possible for organisations located in another Member State to perform the maintenance of aircraft. This will in particular ease evolving models, such as cross-border operations. Furthermore, it will be easier to purchase or sell aircraft or components, and it will be easier for pilots to change employer.

'Air operations' — The relevant factor for exclusion of military, customs, police, search and rescue, firefighting, coastguard and similar services from the scope of the Basic Regulation is the nature and

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[6] Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 315, 28.11.2003, p. 1).

purpose of the operations being or intended to be performed and not the nature of the aircraft, part or appliance itself nor its ownership or whether it is registered as a 'state' or civil aircraft.

Examining more closely the commonalities of these services, it seems that such services serve the public interest, are linked to the defence and/or internal order of States, and they exercise some kind of public authority meaning that they override individual interests. They are conducted with substantial alleviations from operational and performance requirements under strict national control. Any of these elements would make it difficult for certain operations to be subject to common EU rules, which would not cater for all specificities that could exist at national level. Therefore, under the subsidiarity principle, and in line with the majority's view, EASA believes that the regulation of the operational aspects of these services should be left to national competence and not be included in the scope of the Basic Regulation. However, as stated in Article 1(2) of the Basic Regulation, 'The Member States shall undertake to ensure that such activities or services have due regard as far as practicable to the objectives of this Regulation'.

2.2.3. Annex II: Review of list of excluded aircraft

Summary of the comments received

A significant number of stakeholders propose to include more categories of aircraft in Annex II (e.g. Light Sport Aircraft (LSA), Very Light Aircraft (VLA), gliders, and balloons). However, some stakeholders also suggest not to modify Annex II. Several commenters insist that microlights remain firmly in Annex II. A minority of authorities would like to see a full deletion of Annex II. Finally, some stakeholders suggest that any decrease of the scope of Annex II should be linked to the successful implementation of the measures resulting from the GA Road Map.

Apart from these general comments, some detailed ones may be highlighted:

— Inconsistency between the Maximum Take-Off Mass (MTOM) of powered aircraft and gliders included in Annex II;

— Proposal to include single-seat balloons ('solo hot-air balloons' or 'hoppers') in Annex II;

— Modification of the criteria for RPASs to be included in Annex II. Apart from 'weight', 'complexity' for example should be added in the criteria;

— Increase of the MTOM for microlight in Annex II, in particular in the case of electric propulsion to allow development of this technology;

— Provide flexibility in the use of Annex II by allowing to choose if an aircraft should or should not be included in Annex II, or by including only some parts of the Regulation affecting a category of aircraft in Annex II (e.g. 'maintenance' in Annex II, and 'certification' in European rules);

— Possibility to modify quickly Annex II;

— Including suborbital aircraft in Annex II;

— Include all aircraft older than 40 years in Annex II;

— Use of Annex II aircraft in flight training for FCL licences;

— Clarification of the 51 % criterion for home-built aircraft;

— All aircraft are subject to the rules of the air, and the entry criteria for Annex II would be the type of airspace.

Proposed way forward

EASA and the aviation community are making considerable efforts to produce simpler, lighter and better rules for GA (see the GA Road Map section). As the lion's share of the implications by changing Annex II would pertain to GA, broadening its scope at this stage would pre-empt the results of these efforts. Indeed, the new approach for initial airworthiness, which is actively being prepared for small, low-risk aircraft, will be very proportionate and risk-based too. These ambitious proposals envisage delegation of oversight to approved third parties for design and production according to industry standards. It would also have a lot of negative effects on manufacturers as type certificates would need to be revoked with potential negative effects at international level. Furthermore, it would have an impact on national authorities, as some of them may not have the necessary technical resources anymore.

The approach currently under development for RPASs shows that European rules can be proportionate down to a very low mass.

For these reasons, EASA proposes only limited modifications to the scope of Annex II for the time, albeit with a different presentation of Annex II to allow more flexibility for modifying it. This changed presentation would be based on technical criteria[7], not on definitions.

These criteria, contained in the Basic Regulation, would be complemented by an Implementing Rule (IR) providing further details. This two-level mechanism would allow for a quicker way of modifying the factual scope of Annex II via changes at IR level only.

The first edition of this IR could involve the content of the current Annex II, modified to:

— correct the inconsistency between MTOM of powered aircraft and gliders included in Annex II by increasing the MTOM of gliders in Annex II;

— include single-seat balloons ('solo hot-air balloons' or 'hoppers');

— withdraw RPASs of not more than 150 kg from Annex II in order to include all RPASs in the scope of the Basic Regulation and to establish proportionate, risk-based provisions for all RPASs;

— increase the MTOM for microlights in Annex II when equipped with electric propulsion to allow development of this technology. This increase is necessary due to the high weight of batteries. It would be justified by the environmental benefits whereas other previous increases were made to allow installation of safety equipment;

— provide more guidance on the 51 % criterion where there is lack of harmonisation between Member States.

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[7]   Including the following, for example:
  — whether the aircraft is used commercially;
  — society's risk tolerance for accidents in the pertinent activity;
  — whether there is a single market dimension of the design and production;
  — the peculiarities of the aircraft;
  — aircraft operation and operating environment;
  — possible risk to third parties.

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The inclusion of suborbital aircraft in Annex II is not proposed because these aircraft are complex and represent a new type of operations.

2.2.4. Regulation of Ground Handling Service Providers (GHSPs)

Summary of the comments received

Answers to the question of inclusion of GHSPs in the Basic Regulation have been numerous and nearly consensual, as the vast majority of the affected stakeholders responded positively to the idea. They agreed to see unaddressed safety issues in the area of ground handling and stated they wish to see benefits in addressing GHSP safety obligations by including this subject in the scope of the Basic Regulation, hereby filling in a significant gap as there are currently no safety rules at European level to cater for these providers.

A certain degree of hesitation and opposition has been voiced by predominantly air operators which point to the natural interest of the involved parties to act safely, hence stating that regulation beyond the existing national rules would not be required. Elements of indicated opposition are widely based on feared future, overly detailed technical rules, and possible stringent future certification requirements. Stakeholders also pointed to existing efficient industry standards, such as the International Air Transport Association (IATA) framework with the IATA Ground Operations Manual (IGOM) and the IATA Safety Audit for Ground Operations (ISAGO).

In response, it should be noted that by addressing the requirements on GHSPs via the Basic Regulation, a certification requirement doesn't necessarily need to be introduced since a set of alternative technical mechanisms would be at hand at implementing level. In addition, it appears promising indeed to consider industry practices and standards when performing such future work. The focus of this work would be to create a well-measured legal and enforceable obligation rather than to introduce technically new requirements.

Proposed way forward

The outcome of the A-NPA public consultation lends support to the inclusion of GHSPs in the Basic Regulation by creating a vehicle to directly address the safety obligations of these providers. Environmental aspects might be considered in this context as well.

A well-measured approach not leading to a certification requirement but making full use of existing industry standards will address the remaining concerns.

2.2.5. Common repositories for organisations and licences

Summary of the comments received

The majority of the commenters (including NAAs, operators, manufacturers, maintenance providers and unions/staff associations) consider the establishment of a common EU repository for organisation approvals and personnel licences as the way forward to address the existing fragmentation.

Major opposition to such a common repository was voiced by some industry associations and Air Traffic Management (ATM) service providers.

Furthermore, the commenters expressed a number of general concerns with regard to costs, confidentiality, personal data protection, and additional bureaucracy.

Proposed way forward

EASA proposes to introduce in the Basic Regulation the concept of 'hub-and-spoke' common repository system for organisation approvals and personnel licences.

Whilst the approval and licensing responsibilities remain unchanged, all Member States and EASA would be subject to common requirements on how to feed their approval/licences databases in a standardised, timely, and consistent manner.

The content of these databases should then be initially transferred to EASA and be updated on a regular basis. EASA should be tasked to centrally manage this common repository.

The development of a common approvals and licences repository should take into account the experience gained with the introduction of the European Central Repository (ECR) for occurrence reports on the basis of Directive 2003/42/EC[8], Regulation (EC) No 1321/2007[9], and Regulation (EC) No 1330/2007[10,11].

2.3. Revisiting the EASA's remit

2.3.1. Enhance the scope of environmental protection

Summary of the comments received

The majority of the commenters do not see any issues or problems with EASA's current remit concerning environmental protection which the Basic Regulation defines, by direct reference, to be the chapters of ICAO Annex 16. Most commenters strongly support the global harmonisation that results from working though ICAO's Committee on Aviation Environmental Protection (ICAO/CAEP) and support EASA's continuous activity in this area.

Some stakeholders expect that the extended EASA competence might lead to fewer local operating restrictions. Others support the idea of European rules, hoping for better solutions to current problems as well as the alignment of the environmental regulation structure with that for safety (e.g. by simplifying Annex 16 language and transposing it into Certification Specifications (CSs)).

Several commenters suggest though that EASA should become more involved in the aviation-related elements of the REACH Regulation[12], hoping that this would lead to less burden on the sector and avoid potential negative impacts on safety. Some industry representatives propose that EASA should be consulted or even have the right of veto over proposals that affect aviation.

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[8] Directive 2003/42/EC of the European Parliament and of the Council of 13 June 2003 on occurrence reporting in civil aviation (OJ L 167, 4.7.2003, p. 23).

[9] Commission Regulation (EC) No 1321/2007 of 12 November 2007 laying down implementing rules for the integration into a central repository of information on civil aviation occurrences exchanged in accordance with Directive 2003/42/EC of the European Parliament and of the Council (OJ L 294, 13.11.2007, p. 3).

[10] Commission Regulation (EC) No 1330/2007 of 24 September 2007 laying down implementing rules for the dissemination to interested parties of information on civil aviation occurrences referred to in Article 7(2) of Directive 2003/42/EC of the European Parliament and of the Council (OJ L 295, 14.11.2007, p. 7).

[11] Directive 2003/42/EC, Regulation (EC) No 1321/2007 and Regulation (EC) No 1330/2007 have been repealed by Regulation (EU) No 376/2014.

[12] Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (OJ L 396, 30.12.2006, p. 1).

Some commenters (travel organisations and crew associations) support the idea that EASA would set standards for cabin air quality.

Other commenters mention that EASA might support Member States in aviation environmental protection subjects, such as developing harmonised models, procedural tools and guidelines for the implementation of European requirements, especially with the introduction of new aircraft types for which EASA performed the environmental protection work. On the other hand, some remarked that EASA's involvement should not reduce flexibility of finding local solutions to local problems.

Proposed way forward

Based on an analysis of the A-NPA and the stakeholder feedback, it is proposed to strengthen European policies for aviation environmental protection by:

— creating a legal basis for developing (with our stakeholder partners) a 'European Aviation Environmental Plan (EAEp)' in order to provide a common **focus on European aviation environmental performance issues** and **promote communication** at European level. This Environmental Plan could, if wished, be combined with the existing EASp (see Section 2.1.2) in a single European Aviation Plan;

— strengthening the role of EASA in the assessment of interdependencies between safety, environmental and cost-efficient performance targets. Of particular interest are:

• the REACH process, as it may lead to the potential prohibition of substances used in aviation where EASA should have a more active role in the rulemaking and decision-making process of the European Chemicals Agency (ECHA)[13];

• alternative fuels;

• climate change resilience;

• the development of performance indicators to measure the effectiveness of ANSPs, operators, GHSPs and aerodromes with regard to environmental protection;

• cabin air quality; and

• support to Member States;

— promoting more efficient use of European resources on aviation-related environmental research by drawing upon EASA's technical expertise for the purposes of prioritisation, production of standards, and coordination in research;

— notwithstanding the continuous efforts to further enhance global harmonisation through ICAO as the preferred means of standard-setting, it is suggested to allow for some flexibility. If deemed necessary and appropriate in the interest of European citizens and stakeholders, it should be possible to deviate from or go beyond such global standards.

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[13] However, it should be noted that neither the REACH Regulation nor the Basic Regulation take precedent over the other. Therefore, the full and comprehensive alignment of both Regulations (or something like a comprehensive solution) requires coordinated effort of all parties concerned.

2.3.2. Aspects of aviation security

In the A-NPA, security matters were split in two by distinguishing the technical matter of airworthiness-related security actions from the wider, general aspect of aviation security.

For the sake of clarity and brevity, this Opinion addresses both security matters within this section.

Summary of the comments received

The consultation showed a clear and consensual understanding of and support for the extension of the EASA's remit to properly address necessary security-related changes and their effects on airworthiness, before all by empowering EASA to install proper mechanisms for the issue of Sensitive Security Airworthiness Directives (SSADs).

Responses to the general question of the possible inclusion of security matters in the scope of the Basic Regulation, however, have been highly diverse and indicated some degree of hesitation. Predominantly, commenters referred to the fact that security matters — and addressing them properly — could not be detached from the multitude of security and intelligence entities existing at national level under national sovereignty. Elevating aviation security from existing national competencies to EU level would, therefore, disintegrate this functionality, create additional interfaces, and be counterproductive.

At the same time, challenges emerging from today's security rules were raised, particularly for GA stakeholders. A more balanced, fully proportionate rule approach was sought based on more robust stakeholder involvement in the development of such rules. Furthermore, benefits are seen in a prospect to remove political implications from the highly technical matter of security.

Proposed way forward

Reflecting on the above, it is suggested to install appropriate enabling provisions in the Basic Regulation in order to adequately address airworthiness-related security matters. Along the same vein, it is also proposed that a clear legal basis be established for EASA to deal with aviation systems' cyber security. Other than that, the split between the scope of European and national level competencies in the field of security should remain as is.

While leaving national competencies and thereby the crucial integration with other national security-related entities untouched, a shift of actions within the European remit itself is proposed from the European Commission to EASA. Hence, EASA should be responsible for the execution of related security tasks in its capacity of technical support to the European Commission and the related Committee.

Firstly, it is proposed that the development of security rules and common standards for equipment should be within the EASA's remit. In particular, the development of common EU standards and certification procedures would benefit from EASA's well-established consultation process and extensive experience in the development and application of conformity assessment procedures. Secondly, the matter of performing security inspections should form part of the EASA's remit, as it is a technical task, better fitting into the mandate of an agency, and allowing the Commission to focus on its core policy and enforcement functions. Appropriate cooperation procedures would have to be developed between EASA and the Commission to allow EASA to have access to security-sensitive information necessary for performing these additional tasks. This approach would allow for security

rules to be better streamlined with safety matters that are already being addressed by EASA, as well as better interface between security rules and safety matters.

2.3.3. EASA's contribution to the Single European Sky (SES) initiative and the SES Performance Scheme (SPS)

Summary of the comments received

With very elaborate comments received, this particular subject attracted much interest and numerous reactions during the consultation. While the majority of the commenters were positive towards an extended mandate of EASA in this context, a multitude of specific concerns, limitations and conditions has been raised. A general notion therein has been the objective to streamline and concentrate efforts at European level thus ensuring a most efficient approach to existing and future challenges. Key parameters referred to in the comments were to ensure the best use of the SESAR deliverables and arrival of new technologies, and to mind the interdependencies between safety and capacity, environment and other aspects which should not be unlinked by the regulatory approach. The proper implementation of the SPS is seen high on the agenda.

It is worthwhile noting that the two main aspects of the question — i.e. EASA's contribution to the SES initiative as well as to the SPS — have progressed quite significantly since the A-NPA was issued. EASA's role in the SES has been addressed by the SES2+ initiative. As regards SPS, the status of the Performance Review Body (PRB) has been publicly discussed based on European Commission initiatives, which contain also links to EASA.

Therefore, any further, concrete action leading to possible changes to the Basic Regulation in this regard would need to be based on the aforementioned developments and fine-tuned with their progress or final outcome.

Proposed way forward

Once the parallel regulatory changes within the SES take better shape, the changes to the Basic Regulation should be considered with a view to enabling EASA assist the European Union in addressing the aforementioned challenges. To do so, an enhanced role should be prescribed for EASA in those fields, starting with safety and environment, thus facilitating the implementation of the SPS and reinforcing EASA's current SES activities.

Moreover, the Basic Regulation should reflect EASA's role concerning the monitoring and technical supervision of the SESAR deployment phase.

2.3.4. Research needs in aviation safety, security, and environmental protection

Summary of the comments received

The majority of the commenters agree that undue fragmentation exists at EU level with regard to safety and environment-oriented research. No priority is given to aviation safety and environmental issues, implementation results are not being followed up, and access to funding for particular needs (e.g. urgent safety issues or GA specificities) is very limited. As a consequence, closer coordination at EU level to make efficient use of the available resources is widely supported. Several commenters indicated adequate funding and allocation of resources for safety research as a main priority.

A future role of EASA in setting research priorities at EU level is broadly supported — however, without calling for budget centralisation due to diverse funding mechanisms (including national programmes). EASp is recommended as the main vehicle to ensure linkage of the different safety needs and goals, and for setting priorities in aviation safety-oriented research.

The comments reflect the perception that currently EASA itself is not sufficiently resourced for research coordination tasks. Furthermore, the main challenge for EASA will be to ensure an adequate level of funding through EU programmes for safety, security and environment-oriented aviation research.

A potential risk of conflict of interest with the EASA's regulatory activities is raised by several commenters.

Proposed way forward

EASA agrees with the majority's view and proposes to introduce in the Basic Regulation the central role for EASA to coordinate safety and security-oriented and — given the scope of the EASA's remit — also environment-related aviation research at EU level in order to ensure best use of limited and currently fragmented resources.

As a main benefit, the necessary linkage between ongoing, major safety and environmental initiatives and EU research programmes and projects will be ensured, including the incorporation of all aviation system segments, complex developments (e.g. multi-domain, multiannual activities), and needs for urgent safety, security, and environmental research actions.

2.3.5. EASA's role in crisis management

Summary of the comments received

The majority of the commenters do not see major issues with the current European crisis management framework, and consider that the framework, which is built upon the European Aviation Crisis Coordination Cell (EACCC) with the Network Manager in the coordinating role, is adequate. The EACCC, however, should be recognised and strengthened.

The majority of the commenters also consider that an extension of the EASA's remit in this area would not be appropriate, and that its role is to contribute to the European crisis management with its aviation safety expertise and within its remit.

Proposed way forward

EASA shares the majority's opinion that changes to the current European crisis management framework are not required. However, also having in mind recent accidents, the Basic Regulation should reflect in its objectives the active and systematic involvement of EASA in crisis scenarios, including the EACCC to which a cross reference to Commission Regulation (EU) No 677/2011[14] should be inserted.

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[14] Commission Regulation (EU) No 677/2011 of 7 July 2011 laying down detailed rules for the implementation of air traffic management (ATM) network functions and amending Regulation (EU) No 691/2010 (OJ L 185, 15.7.2011, p. 1).

2.3.6. Common EU-level register for aircraft

Summary of the comments received

The majority of the commenters support the current situation where each Member State maintains its own distinct national aircraft register, although it is acknowledged that the overall efficiency of the EASA system in respect of the registration of aircraft could be improved.

The minority believes that a common register and mutual recognition of Certificates of Airworthiness (CofA) within the EU would help improve safety oversight and reduce administrative burden and procedures related to lease and purchase of aircraft. However, also supporters of this concept see a number of legal issues at national, EU and ICAO level.

As an alternative, a few commenters suggested to establish a lighter version in the form of a common repository similar to the one presented in Section 2.2.5. for organisations and licences. In their view, this would already help improve the present situation in terms of efficiency, for instance in verifying that an aircraft is registered on a single registry. However, it is suggested that also this option should be preceded by a cost–benefit analysis.

Proposed way forward

The reduction of administrative burden and, for example, the facilitation of aircraft lease between different EU operators have in the past been brought forward by industry as arguments for a common EU registry. Looking at the option of a full (or partial) common EU aircraft register, setting up such a system is quite complex and would certainly have consequences on the concept of State of Registry, as well as on the CofA, Noise Certificates, licensing of personnel, participation in accident investigations, lease agreements, etc. Additionally, legal implications (such as criminal prosecution, taxation, and social law) which are outside the scope of the Basic Regulation would need to be considered. Most of the legal aspects attached to this concept are not yet thoroughly assessed, let alone addressed; yet, the possible advantages of centralising the registry appear to be overcompensated.

Another, less impacting option is that of a common repository of aircraft. This idea is suggested by a few comments as the one that would allow to follow the airworthiness or ownership of aircraft in the EU and would support CAs in their oversight and monitoring functions. Whilst the immediate added value in terms of safety is hard to measure, a common repository can nevertheless prove beneficial in other areas such as research and data-sharing.

As a stand-alone project, one may doubt that the costs of a common EU aircraft repository (mainly IT development) would outweigh its limited benefits. On the other hand, the implementation costs might be reduced significantly if the aircraft repository was included as an additional component of the common approvals and licences repository presented in Section 2.2.5.

In this context, EASA proposes to include the common EU aircraft repository as an additional element into the common repository concept proposed in Section 2.2.5.

2.3.7. EASA's role in the international context

Summary of the comments received

Although the current role of EASA internationally is generally acknowledged and recognised, particularly by industry, the majority of the commenters consider that its current role in the global context does not allow it to cope with current and future challenges.

Some diverging views are expressed on some specific topics both by national administrations and professional associations. However, the views expressed by industry are strikingly convergent and positive not only in recognising the positive role played today by EASA in the international scene, but also in supporting an extended role for EASA in the future. This is particularly true for Bilateral Aviation Safety Agreements (BASAs) and Working Arrangements (WAs), where even professional associations and almost all administrations that responded to the A-NPA expressed their support to the principle of an extended role for EASA. A very large number of industry and State stakeholders call for a formal role of EASA in the negotiation of more BASAs with major partners. Besides safety, industry stakeholders also highlight the need for EASA to defend European industry interests in the international arena.

Several commenters expressed their support for a strengthened role of EASA to assist non-EU countries in implementing a thorough oversight system based on EASA standards. Funding issues are seen as an important aspect to be addressed in this context.

Some answers highlight the continuity of the EASA's presence in the international scene, whether on institutional (BASAs/WAs), technical assistance, or ICAO matters.

The most contentious topic is the role of EASA in ICAO matters, where some administrations opt for a national approach whereas others, and many industry players, advocate for a more unified presence of the EU and of EASA within ICAO. It was underlined that EASA should be in a position to actively promote regulatory convergence and global harmonisation of aviation safety rules.

Proposed way forward

In response to the feedback received, EASA proposes to strengthen its international role while recognising the Commission's ultimate responsibility at political level.

Today's rather fragmented and partly inappropriate approach, where sometimes national interests of individual Member States and the intermixture with 'off-topic' considerations at political level hinder important developments in domains of EASA competence, should gradually converge towards an integrated system focussing on safety and environmental compatibility while ensuring a level playing field for industry. In the future, EASA should assume a central international coordination function in all technical domains of its competence in order to promote more efficiently safety for EU citizens travelling outside Europe. A concrete element in this would be an enhanced role for EASA in the technical investigations in the context of the EU safety list[15] in supporting the Commission and the responsible Committee.

The current provisions of the Basic Regulation addressing the role of EASA in the international context are deemed to be generally adequate to fulfil most of the requirements called for by the stakeholders

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[15] Regulation (EC) No 2111/2005 of the European Parliament and of the Council of 14 December 2005 on the establishment of a Community list of air carriers subject to an operating ban within the Community and on informing air transport passengers of the identity of the operating air carrier, and repealing Article 9 of Directive 2004/36/EC (OJ L 344, 27.12.2005, p. 15).

and, thus, there is no need to fundamentally amend them. However, in order to overcome existing shortcomings and respond to future challenges, EASA proposes to:

— work towards a more active and recognised role of EASA in ICAO, in particular with regard to its role as a Regional Safety Oversight Organisation (RSOO);

— strengthen its role in the field of mutual acceptance agreements with trusted partners;

— intensify its efforts in promoting EU aviation rules and standards globally;

— strengthen its technical role in supporting the Commission to maintain the EU safety list by assigning the responsibility for all related technical investigations and assessments to EASA;

— enhance its international presence (e.g. through local representations).

In all domains, potential funding issues should be properly addressed. Costs should be balanced against return on investment in the long run.

2.4. Optimising the use of available resources

Summary of the comments received

Most commenters see issues with the available resources at Member State level to perform their certification, continuing airworthiness or oversight tasks, whereby not all CAs and aviation domains are considered to be equally affected by budgetary constraints. An increasing number of CAs are experiencing difficulties in attracting and retaining suitably qualified staff, with the consequence of resource shortcomings to match the size, scope and complexity of the regulated industry. To address the identified issues, most commenters support the establishment of 'resource pools', which will allow CAs to share specific competences in a more cost-effective way.

Furthermore, it is suggested to facilitate the transfer of tasks, either horizontally between CAs or — as a less preferred option — vertically to EASA. Most commenters believe that such a transfer between CAs should take place on a voluntary basis only, and should not include the transfer of the associated legal responsibilities from one Member State to another. Contrary to the above, some commenters believe that the vertical transfer from CAs to EASA should also include the option to delegate responsibilities (as it is the case today for Production Organisations Approvals (POAs) oversight activities).

Most of the commenters argued that this resource usage, and transfer of tasks, should be closely linked to the funding of oversight activities.

Proposed way forward

The concept of 'resource pooling' is considered by EASA as an effective mechanism to identify the availability or lack of skilled resources at EU level and to quickly and efficiently deploy available resources in order to increase cooperative oversight amongst CAs.

EASA proposes to amend the Basic Regulation in order to facilitate the voluntary and temporary (i.e. non-irreversible) transfer of responsibilities and tasks horizontally between CAs, but also vertically from CAs to EASA. This flexibility would allow for a certain level of specialisation at CA level, as each CA could take over the performance of one or more responsibilities and tasks from several other CAs and

become a regional 'centre of expertise' with an adequate work volume (thus leading to economies of scale).

Some careful work should also be dedicated to a mechanism to impose — under exceptional circumstances in case of severe safety shortcomings — on one CA the temporary use of resources from another CA, or from EASA.

The concept of Qualified Entities (QEs) should also be further expanded, for example allowing QEs to be centrally accredited by EASA, if applicable, thus eliminating the need for multiple accreditations of the same QE used by various CAs ('pan-European QE') and, consequently, creating additional potential for economies of scale.

EASA should also be given a more prominent role in facilitating and coordinating effective cooperation amongst CAs, e.g. by supporting the development of best practices and common standards/tools for the benefit of all CAs. This might also include the creation of a pool of inspectors mutually accepted and used as needed by all CAs.

Finally, consideration should be given to the possibility for a higher level of integration between EASA ('hub') and CAs ('spokes') which might in the long term act as EASA local representatives for certain activities/domains.

In any case, the pooling of resources and the horizontal or vertical transfer of responsibilities and tasks require a solid legal basis for its funding, and should allow for the reliable, long-term planning for all involved parties.

In this context, a consistent and sustainable funding system for the whole EASA system should be considered and ensured. The diversity of the current funding schemes for different NAAs (fees, passenger charges, subsidies) introduces imbalances between the different NAAs which would eventually lead to oversight loopholes and weaken the EASA system. It is proposed to harmonise the funding scheme for NAAs, in order to facilitate the exchange of personnel and delegation of tasks (see infra).

2.5.   Ensuring adequate and stable EASA funding

Summary of the comments received

The majority of the stakeholders from the industry — independently of the size of the organisation — see issues with the current funding system of EASA and with its long-term stability, whereas the majority of government organisations do not.

Whilst a clear majority supports funding through subsidy (or at least a mixed funding solution including fees and charges), opinions are diverging when it comes to generating budget by means of route charges and/or passenger contributions.

Comments made with regard to fees and charges clearly indicate a desire for a change to the fee distribution. Other comments were made with reference to the efficiency of EASA, the overall European aviation system, and the complexity of its rules and their implementation, where simplification could also lead to the reduction of fees and charges — as anticipated by the commenters.

There is general consensus that EASA should be given more flexibility and independence with regard to the use of its revenues from fees and charges, in particular for staffing purposes.

Proposed way forward

Firstly, EASA proposes to review the current fees and charges structure. This does not require a change to the Basic Regulation, as it may be addressed by fully revising the Fees & Charges Regulation[16], planned as from 2018.

Secondly, it is proposed to amend the Basic Regulation in order to include additional sources for the EASA's revenues. These may range from route charges over passenger contributions to other external grants (e.g. from specific EU funds), either to finance specific and clearly defined activities, or to be included in the EASA's general budget and to be used as deemed most appropriate by EASA.

As ATM regulatory activities are transferred from EUROCONTROL to EASA, the funding and its mechanism should be transferred too while the total amount of airspace user contributions should not be affected and even diminished through efficiency gains.

In the long run, a more comprehensive reform of the current funding system — in which regulatory costs are borne at EU and national level in a fragmented, sometimes ineffective and even unfair manner — would help overcome many shortcomings as identified in this Opinion.

2.6. Further integration of aviation aspects and aviation regulation beyond the EASA's facets

Summary of the comments received

The comments received on this part of the A-NPA were highly diverse, varying from very detailed technical proposals to very high-level (policy) statements, touching upon many different areas and pointing to very different directions. In conclusion, two issues raised by the commenters should be highlighted at this point.

Firstly, the split of responsibilities in the existing system and the resulting gaps, duplications and inefficiencies are partly confirmed by stakeholders, mostly in the ATM domain. Whilst the majority of the commenters request an improvement of the existing system, it is only a minority that considers an overall, holistic approach beyond safety as a positive step forward.

Secondly, the majority of the commenters responded that the scope of the Basic Regulation should not be extended in this regard.

Proposed way forward

EASA agrees with the broad majority of the commenters that a fundamental change of the existing overall aviation system is currently not feasible. Consequently, the further extension of the EASA's scope should not go beyond the proposals made in other parts of this Opinion.

However, EASA proposes that any future EU legislative activities in the area of aviation should be used as an opportunity to further align, or even combine, existing legislation and regulatory competences as appropriate. This in itself does not necessarily imply an extension of the EASA's remit or any other change to the current allocation of responsibilities in the EU aviation system. But it would certainly

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[16] Commission Regulation (EU) No 319/2014 of 27 March 2014 on the fees and charges levied by the European Aviation Safety Agency, and repealing Regulation (EC) No 593/2007 (OJ L 93, 28.3.2014, p. 58).

help simplify the complexity of the current EU legal framework and further reduce existing gaps, duplications, inefficiencies and uncertainties currently being open to interpretation. Duplications in the ATM environment and the recent example of Regulation (EU) No 376/2014 on occurrence reporting clearly demonstrate the shortcomings of parallel regulatory frameworks and the need for a harmonised and integrated approach. The same applies to security where gaps can put the overall air transport system at risk.

3.   Conclusion

This Opinion suggests significant changes to a substantial number of aviation fields in order to render the European aviation system and EASA capable to address both current and future challenges. It should be emphasised that the proposals presented in this Opinion are based on the acknowledged expertise of and contributions made by the aviation community during the A-NPA public consultation, and that they are not limited to merely regulatory or legal changes to the Basic Regulation, but also include several non-Basic Regulation-related changes which appear very promising and crucial in this context. These non-Basic Regulation-related changes are a necessary element of the required future set-up, and EASA will endeavour to assist in their adequate implementation.

Apart from that, this Opinion proposes changes to the Basic Regulation, with the most significant ones being in the following fields:

—   GA changes according to the GA Road Map results;

—   optional and partial inclusion of State services;

—   Annex II adjustments;

—   security aspects subject to EU competency already;

—   provisions to be addressed to GHSPs;

—   consolidated role in SES matters;

—   role in research coordination; and

—   robust funding solutions.

Done at Cologne, on 13 March 2015.

Patrick KY
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