

Call for Information on Future Air Traffic Services Rulemaking

Published by the Civil Aviation Authority, 2026

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Executive Summary

The regulatory environment for air traffic services (ATS) in the UK is split between assimilated legislation and requirements contained within the Air Navigation Order 2016, that are supplemented by civil aviation publications published by the Civil Aviation Authority (CAA).

The need to make changes to the overall regulatory framework for aviation safety has been recognised by both the CAA and the Department for Transport (DfT) and work on this is ongoing. However, the CAA believes it appropriate to consider the steps that can be taken now to modernise the ruleset for the ATS domain, preparing it for any potential future changes to the framework.

This will take the form of a package of work that is likely to see widespread changes to the structure and format of the 'ruleset' used in ATS. While the CAA and DfT are responsible for deciding on the form and content of those rules, the CAA believes that engagement with industry is important to ensure that any revised rules are effective, proportionate and capable of successful implementation.

This call for information seeks the views of ATS providers, air traffic controllers and flight information service officers on some of the principles on which our work will be based.

Chapter 1

Introduction

Why are we seeking information?

- 1.1 The Civil Aviation Authority (CAA) is beginning a package of work that is likely to result in widespread changes to the structure and format of the 'ruleset' used in air traffic services (ATS). Our objectives in undertaking this work are to clarify the requirements placed upon ATS providers and simplify the ruleset through the development of a comprehensive and coherent regulatory environment.
- 1.2 The CAA plans to involve UK ATS providers in the development of this revised ruleset. In doing so, our goals are to ensure that the new ruleset aligns with better regulation principles (including the effectiveness and proportionality of the proposals) and to build our understanding of how we can support industry in the future as we move towards implementation. Through this approach, we believe that we will establish a robust foundation on which the ATS domain will be well prepared for any future development of aviation's regulatory environment.
- 1.3 In this document, we outline founding principles that should inform the development of the future ruleset for ATS, alongside initial proposals on which we are seeking feedback from stakeholders.

Why now?

- 1.4 The CAA believes that now is the right time to engage with industry on this work, primarily because of two key strategic drivers for change: the implementation of the Airspace Modernisation Strategy (AMS) and possible changes to the UK's regulatory framework for aviation safety. These are significant change programmes that have the potential to affect all ATS providers.

Airspace Modernisation Strategy

- 1.4.1 In 2017, the Secretary of State for Transport tasked the CAA with preparing and maintaining a coordinated strategy and plan for the use of UK airspace up to 2040, including modernisation. Working together, the CAA and the Department for Transport (DfT) have developed a shared vision for the modernisation of the UK's airspace. The resulting AMS is based on four strategic objectives¹ which

¹ Safety, integration, simplification and the environment. More information on the AMS can be found on the CAA's website: [Airspace Modernisation Strategy | UK Civil Aviation Authority](#).

are intended to deliver quicker, quieter and cleaner journeys, and more capacity for the benefit of those who use and are affected by UK airspace.

- 1.4.2 The implementation of the AMS will deliver significant changes within the UK's existing volumes of controlled airspace², yet it is the delivery of the Strategy's 'Lower Airspace Concept' where many airspace users and ATS providers are likely to see tangible change.

UK's Regulatory Framework for ATM/ANS³

- 1.4.3 Before the UK began to relinquish responsibility for air traffic management (ATM) and air navigation services (ANS) rulemaking to the European Union (EU), the requirements used to assess an ATM/ANS provider's competence to provide a service were developed by the CAA, and published in civil aviation publications (CAPs) under powers conferred by the Air Navigation Order (ANO).
- 1.4.4 Beginning near the turn of the millennium, the EU began the process of enacting legislation in relation to ATM/ANS, using the same 'rule⁴, acceptable means of compliance (AMC) and guidance material (GM)' model used in other aviation domains; for example, airworthiness and air operations. As the EU took greater competence in these areas, UK legislation and CAPs were altered as part of the work.
- 1.4.5 At the point where the UK left the EU, a number of ATM/ANS domains had not completed their transition into EU law⁵. Consequently, whilst many ATM/ANS requirements are contained within assimilated law⁶, technical requirements and some organisation requirements for the provision of ATS remain within CAPs⁷. These CAPs are thus an integral part of the UK's provision of safe and efficient ATS, and represent our current means of adoption of, and compliance with, Standards, Recommended Practices (SARPs) and Procedures for ANS (PANS) developed by the International Civil Aviation Organisation (ICAO).

² Through the delivery of the Future Airspace Strategy Implementation (FASI) programme which will redesign terminal airspace in England and Scotland.

³ See Figure 1 in [GM1 ATM/ANS.OR.A.001 Scope](#) to understand the constituents and scope of ATM/ANS.

⁴ In this document, the words 'rule' and 'requirements' are used interchangeably. Both terms refer to mandatory and legally enforceable requirements on regulated persons and entities which must be complied with.

⁵ In the EU that transition was achieved by Reg (EU) 2020/469, an amending instrument that inserted relevant provisions into Reg (EU) 2017/373 which lays down common requirements for ATM/ANS providers and Reg (EU) No 923/2012, which lays down the common rules of the air.

⁶ In UK Reg (EU) 2017/373, known as the "ATM/ANS Implementing Regulation (IR)". Annex III sets out common requirements to be met by all ATM/ANS service providers. Annexes IV to XIII set out the organisation requirements and technical requirements specific to each type of service provider.

⁷ Examples of these are the Manual of Air Traffic Services Part 1 (CAP 493), the Flight Information Services Officers Manual (CAP 797) and ATS Safety Requirements (CAP 670).

- 1.4.6 The CAA considers that the UK's regulatory framework for ATS being split between assimilated legislation and requirements developed by the CAA under the ANO gives rise to a number of issues, including:
- The fact that some requirements are set out in assimilated legislation while others are set out in CAPs increases the complexity of the framework and makes it more difficult to understand the regulatory landscape.
 - The CAA considers that a clear and comprehensive ruleset is critical to maintaining high levels of safety in the UK's airspace. The existence of parallel legislative frameworks in the ATS domain makes this more challenging than it should be. Within the existing legislative framework, the CAA has no power to overcome that difficulty without creating a degree of duplication between assimilated legislation and CAPs⁸; a solution that is not ideal.
 - The complexity of the ruleset increases costs to industry in their achievement of compliance and to the CAA in maintaining it.
 - It is more complicated to demonstrate compliance with ICAO SARPs.
 - The complexity of the existing ruleset means that rulemaking activity to amend it is extremely time and resource intensive. This can make it difficult to make changes in a timely way.
 - ATS providers overseen by both the CAA and the EU Aviation Safety Agency (EASA) must demonstrate compliance with both UK and EU rulesets. Divergence between the two regulatory regimes places additional workload on the service provider.
- 1.4.7 The need to make changes to the regulatory framework for aviation safety and to address these issues has been recognised by both the CAA and the DfT. In June 2025, the DfT launched a targeted stakeholder consultation on the Aviation Safety Regulatory Framework⁹. One of the purposes of this consultation was to seek industry's view on a proposal to "remove detailed technical regulations from secondary legislation, and to give the Civil Aviation Authority (CAA) new powers to write legally binding rules."
- 1.4.8 If a decision to make changes to the regulatory framework is made, then it will be a complex undertaking which will take time to complete. However,

⁸ For example, the duplication between UK SERA Sections 7 to 11 and 14 and the related content within the MATS Part 1 (CAP 493), the FISO Manual (CAP 797) and the Radiotelephony Manual (CAP 413).

⁹ The document supporting that consultation is here: [Aviation Safety Regulatory Framework Targeted Stakeholder Consultation](#).

irrespective of the 'shape' of the legislative environment in the future, the CAA believes that it is appropriate to consider the steps that can be taken now to:

- begin to address the issues identified in paragraph 1.4.6; and
- modernise the ruleset for the ATS domain, preparing it for any possible future changes to the framework.

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Chapter 2

Principles informing the future ruleset for ATS

Principles

- 2.1 The DfT and the CAA have identified clear principles which should inform the future development of the ATS ruleset.

Terminology

- 2.1.1 The term 'shall' should be replaced by 'must' to indicate an absolute obligation or a requirement that leaves no room for discretion.
- 2.1.2 The CAA considers that the use of the term 'must' instead of 'shall' is likely to have a negligible impact upon ATS providers. Essentially, it is an administrative change which would require industry to amend its operations manuals¹⁰ and local documentation to reflect the revised terminology.

Structure of the ruleset

- 2.1.3 There should be clarity on when rules are mandatory and when a degree of flexibility is available for regulated entities to demonstrate their compliance; i.e. a means of compliance.
- 2.1.4 To achieve that clarity, it is proposed that requirements will be separate from their related means of compliance and guidance using the format already seen in assimilated law. This would enable a consistent 'look and feel' throughout the ATS ruleset and would address the issues described in paragraph 1.4.6. The CAA understands that this change may have second-order effects (see paragraphs 3.7 to 3.11) but we consider that there are good reasons to overhaul the ruleset.
- 2.1.5 Since the CAA first published the UK's Manual of ATS (MATS) Part 1 (CAP 493) in 1974, requirements, their means of compliance and guidance material were written in what could be described as a 'narrative' style. They were not kept separate from each other in the way seen in assimilated law, relying on the use of modal verbs (for example, 'shall' and 'should') to differentiate between them¹¹. That narrative style mirrored the method used by ICAO in writing SARPs and PANS.

¹⁰ As required by [ATM/ANS.OR.B.035](#) in Annex III Part-ATM/ANS.OR to UK Reg (EU) 2017/373.

¹¹ See MATS Part 1 (CAP 493) Foreword paragraph 4A 'Interpretation of Words' and/or the FISO Manual (CAP 797) Foreword 'Interpretation of Words'.

- 2.1.6 Beginning near the turn of the millennium, the EU introduced the more structured rule, AMC and GM format as a means of differentiating between requirements and their means of compliance. However, as described within paragraph 1.4.5, to-date, this format has only partially been adopted within the ATS domain¹². Technical requirements and some organisation requirements for the provision of ATS remain within CAPs⁷[Error! Bookmark not defined.](#). This has caused confusion over the status of the requirements contained within these CAPs when viewed alongside the assimilated law.
- 2.1.7 The CAA is now laying the foundations for our future work with industry stakeholders that will review these ‘legacy’ CAPs; transposing their contents into a revised format which will clearly distinguish between requirements and their means of compliance. The CAA has not identified a viable alternative to this approach that would address the issues described in paragraph 1.4.6. Moreover, the CAA considers that there are clear benefits from adopting this structure:
- It would achieve a consistent approach across the ATS and wider aviation ruleset, minimising the overall change burden, streamlining the rules and reducing administrative burden;
 - It would ensure that legally enforceable requirements are clear and understood by everyone to be mandatory;
 - It would allow ICAO SARPs and PANS to be implemented in the UK in a way which gives them clear effect and legal status, and enables international harmonisation more easily where appropriate;
 - The provision of supporting AMC would mean that regulated entities can clearly understand the CAA’s expectations in terms of compliance, while incorporating flexibility to demonstrate compliance by other means in appropriate circumstances¹³.
- 2.1.8 Additionally, in adopting the structure seen in assimilated law, the CAA would retain the referencing system already used in the UK’s Annex IV Part-ATS¹⁴. For example, ‘Section 1 General Requirements’ and ‘ATS.OR.100 Ownership’ contained in Annex IV would be presented in the same way in the future. Moreover, the CAA envisages using the work undertaken by the EU and EASA

¹² For example: Assimilated Regulation (EU) No 923/2012 ‘The UK Standardised European Rules of the Air (SERA)’; Assimilated Regulation (EU) 2017/373 ‘The ATM/ANS Regulation’; and Assimilated Regulation (EU) 2015/340 ‘The ATCO Licensing Regulation’.

¹³ A good example for air traffic control service providers is that there is a requirement to apply wake turbulence separation but there are a number of potential means of achieving it; e.g. the UK’s 6/7 category approach, RECAT-EU, ICAO J/H/M/L etc.

¹⁴ Contained within Assimilated Regulation (EU) 2017/373.

as a guide to establish the additional sections and reference numbers that would be required in relocating technical and organisation requirements from legacy CAPs into the new framework. We consider that this approach would minimise the change burden to industry and simplify the work of those UK ATS providers who must demonstrate compliance with both UK and EU rulesets.

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Chapter 3

Initial proposals

Introduction

- 3.1 As described earlier, the CAA seeks to work with the UK's ATS industry on the development of a revised ruleset. We are cognisant that this work will take time to complete and is likely to be complex in its development and, to an extent, in its implementation.
- 3.2 We envisage that the work will include:
- Identification and analysis of existing requirements (both in legislation and in CAPs) their means of compliance and guidance material.
 - Comparison of the current UK ruleset to ICAO's SARPs and PANS to confirm and review Differences¹⁵.
 - Advising on the development of the new regulatory requirements and the associated means of compliance and guidance material.

Key aspects

- 3.3 At this early stage, we are asking for feedback from industry on some of the key aspects that will inform this work.

Participation

- 3.4 In undertaking this work, while the CAA and DfT retain responsibility for reaching and making decisions, the CAA welcomes input from stakeholders to ensure that the requirements within any revised ruleset are effective, proportionate and capable of successful implementation.
- 3.5 To inform the more detailed work of the future, the CAA will establish a sub-group under the auspices of a new ATS Procedure Development Working Group (ATSPDWG)¹⁶. The participants of that sub-group will be drawn from the ATSPDWG (see [Annex A](#) for details) and will meet regularly (both physically and virtually) to undertake the work necessary to inform the development of the

¹⁵ Note that the CAA's aspiration is to increase our degree of alignment with ICAO's provisions. We will maintain a Difference where it is impracticable or inappropriate to implement the ICAO provision, or where we can achieve a higher level of safety performance or efficiency through that Difference.

¹⁶ Initially, the ATSPDWG will be formed through the merger of three existing CAA engagement fora: the ATC Procedures Working Group, the Radiotelephony Phraseology Working Group, and the Remote Aerodrome ATS Working Group.

new ruleset. The CAA will complete the 'heavy lifting' associated with the comparison of existing requirements to ICAO's SARPs and PANS and the drafting of the new ruleset. Industry's involvement will be invaluable in analysing the existing requirements and in supporting the final development of the new ruleset.

3.6 The CAA wishes to understand whether you:

- agree with the proposed membership of the sub-group?
- think that there are additional organisations which should be represented on the sub-group?

Documentation

Unit operations manuals

3.7 As described earlier, the CAA considers that the relocation of technical and organisation requirements from legacy CAPs into a new framework using the format seen in assimilated law is the only viable means of addressing the issues described in paragraph 1.4.6. The CAA's current view is that the revised format may have an impact in two specific areas:

- the development of a unit's operations manual; and
- the useability and ease of understanding of the rule, AMC and GM style for individual air traffic controllers (ATCOs) and flight information service officers (FISOs).

3.8 Today, a unit's Manual of Air Traffic Services (MATS) or Flight Information Service Manual has two components: one that is maintained by the CAA (i.e. the MATS Part 1 (CAP 493) and the FISO Manual (CAP 797)) and one that is maintained by the ATS unit. The purpose of the document produced by the unit is to amplify and interpret, at local level, the content developed by the CAA. However, the adoption of the revised style of presenting requirements would likely necessitate a move away from having a manual with two components.

3.9 If the revised format is introduced, the ATS provider would use the published requirements (alongside AMC, approved alternative means of compliance and GM) to develop and maintain the unit's operations manual^{10 17}. This would leave the operations manual as the primary document which details all the instructions and information required by a unit's operational personnel to perform their duties. It would also see the withdrawal of the MATS Part 1 and the FISO Manual. The CAA envisages creating guidance material to inform the

¹⁷ The CAA considers it likely that this manual could continue to be written in a 'narrative' style.

service provider's development of the operations manual based, in-part, on existing content in ATS Safety Requirements (CAP 670).

- 3.10 Whilst the separation of requirements from the related means of compliance and guidance would provide clarity to service providers, the 'primary audience' for the revised ruleset would be the ATS provider, not individual ATCOs and FISOs as is largely the case with the MATS Part 1 and FISO Manual today. From an ATS unit perspective, if this model were adopted, the CAA considers that it is the units' operations manual which individual ATCOs and FISOs would refer to as a primary source. However, the CAA has considered whether and how the change in format might affect individual ATCOs and FISOs. For example, would individual ATCOs and FISOs have a need to refer to the revised ruleset directly (in addition to their unit's operations manual) and, if so, would the changed format provide information to them in a way that is easy to assimilate?
- 3.11 The CAA intends to explore this issue with the sub-group and would value the initial views of our stakeholders. One option that the CAA has considered is that, in addition to the official rules, AMC and GM, we could also develop a 'Manual of ATS'. This manual could be written in a narrative style to draw together technical requirements, AMC and GM relating only to the operational provision of ATS, acting as a reference guide for ATCOs and FISOs. However, it would be an unofficial version of the requirements, AMC and GM, it would look very different to today's MATS Part 1 and FISO Manual, and it may cause confusion because it would not incorporate alternative means of compliance approved for use at a unit.
- 3.12 The CAA wishes to understand:
- if the ATS ruleset changed to consistently use the format seen in assimilated law (i.e. rule, AMC and GM), would that change have any impact on you?
 - if the ATS ruleset changed in the way described, what challenges might be faced in developing and maintaining an operations manual that details the instructions and information required by a unit's operational personnel to perform their duties.
 - what challenges might be faced if a unit operations manual were used as the sole means of providing the instructions and information required by operational personnel to perform their duties?
 - What do you think are the 'pros and cons' of the proposal for the CAA to develop an unofficial 'Manual of ATS' for the use of individual ATCOs and FISOs, as described above?

- whether your unit's MATS Part 2 or Flight Information Service Manual details any operational procedures that differ from those described within the MATS Part 1 (CAP 493) or the FISO Manual (CAP 797)?¹⁸

Flexibility and means of compliance

- 3.13 At present, the MATS Part 1 (CAP 493) and the FISO Manual (CAP 797) provide some flexibility to ATS providers, permitting them to demonstrate their compliance with a requirement by other means; what have previously been referred to as 'alternative means of compliance'. This flexibility is indicated by the term 'should', or through a reference to procedures detailed within the unit's operations manual. An example of this flexibility relates to wake turbulence separation requirements, with the MATS Part 1 stating "Unless alternative wake turbulence separation criteria are approved and contained in MATS Part 2, the following wake turbulence separation minima shall be applied [...]."
- 3.14 The CAA considers that, by separating requirements from their means of compliance, the revised ruleset will better highlight where 'optionality' exists for ATS providers to demonstrate compliance by other means¹⁹. Alongside the development of new unit operations manuals, the CAA anticipates that the transition to the revised ruleset will require ATS providers to analyse their local instructions to identify, review and record pre-existing alternative means of compliance. The CAA envisages developing guidance material to support industry in this work.
- 3.15 The CAA considers that, if the proposed changes to the ruleset are implemented, this change in the emphasis on a unit's operations manual will require a transition period to allow industry time to adopt the new model. Views on the duration of that transition period will be sought from the sub-group and through later consultation.

Timelines

- 3.16 The CAA's indicative timelines for this project are as follows:
- By Q2 2026, we aim to have established the sub-group and for it to have started its work.
 - By Q4 2027, we aim to have initiated a consultation on our proposals for the new ruleset.

¹⁸ The purpose of this question is only to provide limited initial information to support future work in determining an appropriate duration for the implementation period. The information provided will not be used in any other way by the CAA.

¹⁹ As an example, a comparison of the existing MATS Part 1 (CAP 493) provisions on wake turbulence and how these might be presented in the future is contained in [Appendix 1](#).

- By Q2 2028, we aim to have responded to the feedback we receive as part of our consultation.
- By Q4 2028, depending on the possible impacts of more widespread change to the regulatory framework, we aim to have finalised the new organisation and technical requirements for ATS providers, with their associated means of compliance and guidance material.
- Thereafter, we anticipate an implementation period before the new ruleset becomes effective.

3.17 The CAA wishes to understand whether, based on the description of the scope and objective of the project, you are aware of any obstacles to meeting the indicative timeline?

Related requirements

- 3.18 The Standardised European Rules of the Air (SERA)²⁰ were implemented in EU law and, following the UK's exit from the EU, were assimilated into UK law. SERA's purpose is to lay down the common rules of the air and operational provisions regarding services and procedures in air navigation and its primary audience is pilots. These rules are complemented by the Rules of the Air Regulations 2015 and a series of exemptions, permissions and approvals which adapt the operational environment in SERA.
- 3.19 The CAA is undertaking rulemaking activity which proposes to address the complexity described above by consolidating these legal instruments into a single, coherent Rules of the Air Regulation. As part of this work, we are reviewing the incorporation of the content relating to ATS and its relevance to pilots.
- 3.20 As an example, UK SERA Sections 7 and 8 place requirements upon ATS providers; a situation replicated within the EU's version of SERA. Within the EU, this has led to a situation where requirements placed upon ATS providers through SERA, are duplicated within Annex IV Part-ATS. Accepting the need for pilots to be aware of many of these provisions, the CAA is cognisant that such duplication incurs administrative burden, risks confusion and it is considered inadvisable.
- 3.21 In developing the options for the new Rules of the Air Regulation, the CAA's initial view is that the appropriate approach would be to:
- Ensure that requirements for ATS providers are contained only within the ATS ruleset.

²⁰ Assimilated Regulation (EU) No 923/2012 and its Annex.

- Where appropriate, reframe the ATS related content in the Rules of the Air as guidance material so that it informs pilots about how ATS will be provided to them. As an example, SERA.7002(a) could be rewritten in a way that informs pilots of what will happen, rather than to direct an action for ATS:

“When an identified controlled flight is observed to be on a conflicting path with an unknown aircraft, deemed to constitute a collision hazard, the pilot of the controlled flight ~~shall~~will, whenever practicable [...].”

3.22 The CAA wishes to understand your initial thoughts on this approach to Rules of the Air rulemaking.

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Chapter 4

The call for information

Purpose of the call for information

- 4.1 The purpose of this call for information is to seek the views of ATS providers, ATCOs, and FISOs on our initial proposals to develop a revised ruleset for ATS.

Conduct of the call for information

- 4.2 The call for information will be open for eight-weeks from 7th January 2026 to 4th March 2026.
- 4.3 The call for information will be managed through Citizenspace. Stakeholders are requested to use the response tool within Citizenspace to submit their comments on the CAA's proposals described within this document.
- 4.4 The Citizenspace response tool offers the ability to provide targeted responses on specific aspects of the proposals and 'free text' boxes for more general comments. Respondents should indicate whether they support or object to the proposals and comment accordingly. Should a respondent object to the proposal or an aspect of it, they should explain their rationale and, where appropriate, offer an alternative proposal. Where respondents indicate a preference for an alternative solution(s), these should be supported by appropriate justification.

Call for information questions

- 4.5 For ease of reference for stakeholders, a list of the questions asked in the Citizenspace tool are included in [Annex B](#).

Conclusion of the call for information

- 4.6 At the end of the call for information, stakeholder's comments will be collated and analysed. The CAA will then publish a report which collates those comments and, if appropriate or necessary, our responses and explains what we will do next.

CAA focal point

- 4.7 Stakeholders seeking clarification on the proposals detailed herein should contact Principal Airspace & ATM Policy via email with the subject header 'Call for Information on Future ATS Rulemaking' at ats.enquiries@caa.co.uk.
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ANNEX A.

Proposed Membership of the ATSPDWG Sub-Group

Association of UK Flight Information Service Officers

ATS Committee from Airports UK

Civil Aviation Authority Airspace, ATM & Aerodromes

Guild of Air Traffic Control Officers (GATCO)

Global ATS Ltd

Highland & Islands Airports Limited (HIAL)

Military Aviation Authority (MAA) ATM Regulations

NATS (NERL, NSL and College)

Prospect ATCO's Branch

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ANNEX B.

Call for information questions

Introduction

The CAA uses the Delib Citizenspace digital engagement tool to host and manage engagement activities with our stakeholders. The Citizenspace 'landing page' for this call for information will provide an overview of the proposal and a link to the survey where stakeholders can make their responses. We are unable to accept feedback on our proposals through any other means.

The survey

Section 1 – Stakeholder information

The first part of the survey is intended to gather information on who is providing the survey response. Is it an organisation or an individual that is responding and, if the latter, are they an air traffic controller or a flight information service officer? Stakeholders will be offered the opportunity for their response to be published anonymously, otherwise your name and, if appropriate, organisation will be published alongside your response in our subsequent report.

Section 2 – Initial proposals

The next part of the survey asks a series of questions relating to the CAA's proposals on some of the key principles on which our work to develop the revised ATS ruleset will be based.

- Do you agree with the proposed membership of the sub-group? If no, please explain your rationale.
- Are there additional organisations that you think should be represented on the sub-group? If yes, please nominate an organisation(s) and explain your rationale.
- If the ATS ruleset changed to consistently use the format seen in assimilated law (i.e. rule, AMC and GM), how would that change impact you?
- If the ATS ruleset changed in the way described, what challenges might be faced in developing and maintaining an operations manual that details the instructions and information required by a unit's operational personnel to perform their duties?

- What challenges might be faced if a unit operations manual were used as the sole means of providing the instructions and information required by a unit's operational personnel to perform their duties?
- What do you think are the 'pros and cons' of the proposal to develop an unofficial 'Manual of ATS for the use of individual ATCOs and FISOs? The Manual would only address the operational provision of ATS, and would draw together only the technical requirements, AMC and GM published by the CAA.
- Does your unit's MATS Part 2 or Flight Information Service Manual detail any operational procedures that differ from those described within the MATS Part 1 (CAP 493) or the FISO Manual (CAP 797)? If the answer is yes, can you provide an estimate of how many differences there are?
- Based on the description of the scope and objectives of the project, are you aware of any obstacles to meeting the indicative timelines? Please explain your rationale.
- What are your initial thoughts on the CAA's proposed approach to Rules of the Air rulemaking?

Section 3 – Impact Analysis

Section 70(1) and 70(2) of the Transport Act 2000 place several duties upon the CAA in the exercise of its air navigation functions. The Equality Act 2010 places a duty upon Public Sector bodies to ensure that its proposals do not disadvantage people who are protected under that Act. To assist us in satisfying these duties, in addition to comments on the specific proposals themselves, we invite stakeholders to describe the impacts that they perceive the proposal may have on six specific areas:

- **Safety.** What impact might the proposal have on safety?
- **Efficiency.** What impact might the proposal have on the efficiency of the ATM system, either locally or nationally?
- **Financial.** What financial impact might the proposal have? Will implementation have a financial cost?
- **Security.** What impact might the proposal have on aviation security?
- **Environmental.** What impact might the proposal have on the environment; for example, through increased fuel burn, increased CO2 emissions?
- **Equality.** Do you consider that this proposal may disadvantage people who are protected under the Equality Act 2010? The Equality Act provides that the following are protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex and sexual orientation.

Stakeholders are invited to state the impact that they consider the proposal will have on each of these six specific areas from one of four options:

- Positive impact;
- Negligible impact – should be used where there is an impact, either positive or negative, but where its' impact is considered too small to be worth taking into account;
- No impact;
- Negative impact.

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APPENDIX 1.**Example of current and future wake turbulence separation requirements****Introduction**

The text below provides an extract from the current wake turbulence separation requirements contained within the MATS Part 1 (CAP 493) and compares this to how the same text may look in the future. It is not intended for this example to reflect all the relevant acceptable means of compliance and guidance material relating to wake turbulence, nor for the example of the future content to be seen as a definitive proposal.

Example of current wake turbulence separation requirements**9E. Final Approach**

9E.1 Unless alternative wake turbulence separation criteria are approved and contained in MATS Part 2, the wake turbulence separation minima in table 3 below shall be applied to aircraft on final approach when (SERA.8012):

- (1) an aircraft is operating directly behind another aircraft at the same altitude or less than 1,000 ft below; or
- (2) an aircraft is crossing behind another aircraft, at the same altitude or less than 1,000 ft below; or
- (3) both aircraft are using the same runway or parallel runways separated by less than 760 m.

Table 3:

Leading Aircraft	Following Aircraft	Wake Turbulence Separation Minima Distance (NM)
SUPER	SUPER	#
SUPER	HEAVY	5
SUPER	UPPER and LOWER Medium	7
SUPER	SMALL	7
SUPER	LIGHT	8
HEAVY	SUPER	#
HEAVY	HEAVY	4
HEAVY	UPPER and LOWER Medium	5
HEAVY	SMALL	6

Appendix 1: Example of current and future wake turbulence separation requirements

HEAVY	LIGHT	7
UPPER MEDIUM	SUPER	#
UPPER MEDIUM	HEAVY	#
UPPER MEDIUM	UPPER MEDIUM	3
UPPER MEDIUM	LOWER MEDIUM	4
UPPER MEDIUM	SMALL	4
UPPER MEDIUM	LIGHT	6
LOWER MEDIUM	SUPER	#
LOWER MEDIUM	HEAVY	#
LOWER MEDIUM	UPPER MEDIUM	#
LOWER MEDIUM	LOWER MEDIUM	#
LOWER MEDIUM	SMALL	3
LOWER MEDIUM	LIGHT	5
SMALL	SUPER	#
SMALL	HEAVY	#
SMALL	UPPER MEDIUM	#
SMALL	LOWER MEDIUM	#
SMALL	SMALL	3
SMALL	LIGHT	4
LIGHT	SUPER	#
LIGHT	HEAVY	#
LIGHT	UPPER MEDIUM	#
LIGHT	LOWER MEDIUM	#
LIGHT	SMALL	#
LIGHT	LIGHT	#

Note: # Signifies that separation for wake turbulence reasons alone is not necessary.

Example of future wake turbulence separation requirements

ATS.TR.220 Application of wake turbulence separation

- (a) Air traffic control units shall apply wake turbulence separation minima to aircraft in the approach and departure phases of flight in either of the following circumstances:
- (1) an aircraft is operating directly behind another aircraft at the same altitude or less than 1,000 ft below it;
 - (2) an aircraft is crossing behind another aircraft, at the same altitude or less than 1,000 ft below it;
 - (3) both aircraft are using the same runway or parallel runways separated by less than 760 m.

- (b) Paragraph (a) does not apply to a flight that is operating visually (i.e. IFR or special VFR flights operating under reduced separation in the vicinity of the aerodrome, VFR flights, or IFR flights making a visual approach) and is following or crossing behind another aircraft. In those cases, the air traffic control unit must issue a wake turbulence caution and inform the pilot of the recommended wake turbulence separation minima.

AMC6 ATS.TR.220 Application of wake turbulence separation

DISTANCE-BASED WAKE TURBULENCE SEPARATION MINIMA BASED ON ATS SURVEILLANCE SYSTEM

The following distance-based wake turbulence separation minima should be applied to aircraft being provided with an ATS surveillance service in the final approach phase:

Leading Aircraft	Following Aircraft	Wake Turbulence Separation Minima Distance (NM)
SUPER	SUPER	#
SUPER	HEAVY	5
SUPER	UPPER and LOWER Medium	7
SUPER	SMALL	7
SUPER	LIGHT	8
HEAVY	SUPER	#
HEAVY	HEAVY	4
HEAVY	UPPER and LOWER Medium	5
HEAVY	SMALL	6
HEAVY	LIGHT	7
UPPER MEDIUM	SUPER	#
UPPER MEDIUM	HEAVY	#
UPPER MEDIUM	UPPER MEDIUM	3
UPPER MEDIUM	LOWER MEDIUM	4
UPPER MEDIUM	SMALL	4
UPPER MEDIUM	LIGHT	6
LOWER MEDIUM	SUPER	#
LOWER MEDIUM	HEAVY	#
LOWER MEDIUM	UPPER MEDIUM	#
LOWER MEDIUM	LOWER MEDIUM	#
LOWER MEDIUM	SMALL	3
LOWER MEDIUM	LIGHT	5
SMALL	SUPER	#
SMALL	HEAVY	#
SMALL	UPPER MEDIUM	#

Appendix 1: Example of current and future wake turbulence separation requirements

SMALL	LOWER MEDIUM	#
SMALL	SMALL	3
SMALL	LIGHT	4
LIGHT	SUPER	#
LIGHT	HEAVY	#
LIGHT	UPPER MEDIUM	#
LIGHT	LOWER MEDIUM	#
LIGHT	SMALL	#
LIGHT	LIGHT	#

Note: # Signifies that separation for wake turbulence reasons alone is not necessary.

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