



International
Civil Aviation
Organization

Organisation
de l'aviation civile
internationale

Organización
de Aviación Civil
Internacional

Международная
организация
гражданской
авиации

منظمة الطيران
المدني الدولي

国际民用
航空组织

Tel.: +1 (514) 954-6141

Ref.: SP 59/4-10/6

10 March 2010

Subject: Proposals for the amendment of Annex 6,
Part I relating to operational requirements for rescue and
fire fighting services (RFFS)

Action required: Comments to reach Montréal by
25 June 2010

Sir/Madam,

1. I have the honour to inform you that the Air Navigation Commission, at the seventh meeting of its 182nd Session, considered a proposal developed by the ninth and tenth meetings of the Operations Panel Working Group of the Whole (OPSP/WG-WHL/9 and 10). This proposal was developed to amend the Standards and Recommended Practices (SARPs) of Annex 6 — *Operation of Aircraft*, Part I — *International Commercial Air Transport — Aeroplanes* regarding operational requirements related to the availability of rescue and fire fighting services (RFFS) at departure, destination or alternate aerodromes. The Commission authorized their transmission to Contracting States and appropriate international organizations for comments.

2. Annex 14 — *Aerodromes*, Volume I — *Aerodrome Design and Operations* stipulates that the level of RFFS protection available at an aerodrome shall be appropriate to the type of aeroplane regularly operating at that aerodrome on the basis of the frequency of movements. Studies indicate however, that the level of RFFS protection at many aerodromes does not always meet the requirements of Annex 14. The amendment proposal to Annex 6, Part I introduces provisions that enable operators to assess the risk of operating an aeroplane at a given aerodrome where the level of RFFS protection is below that specified in Annex 14.

3. The proposed amendment is viewed as a safety enhancement and is supported by appropriate guidance material. It does not affect the RFFS requirements of Annex 14, Volume I. The amendment will allow operators to evaluate RFFS capabilities available at normally used destination aerodromes, alternate aerodromes and aerodromes which suffer temporary downgrades of RFFS capability to determine if operations can be safely conducted.

4. Your attention is directed to two areas for which specific comments are requested as follows:

- a) paragraph 4.1.5 indicates that if the level of RFFS protection available at an aerodrome does not meet Annex 14 requirements, the operator shall perform a risk assessment in accordance with its safety management system (SMS) to determine whether or not the operations can be safely conducted. You are requested to comment on the suitability of the statement “in accordance with its safety management system”; and
- b) the methodology and criteria proposed in new Table K-1 of Annex 6, Part I is guidance for use by the operator for planning purposes when assessing acceptable minimum levels of RFFS when the aeroplane RFFS category is not available at one or more of the aerodromes required to be specified in the operational flight plan. You are requested to review and comment on the information in Table K-1 particularly with regard to the statement “if acceptable under the operator’s safety management system”.

5. May I request that any comments you wish to make on the amendment proposals be dispatched to reach me not later than 25 June 2010. The Air Navigation Commission has asked me to specifically indicate that comments received after the due date may not be considered by the Commission and the Council. In this connection, should you anticipate a delay in the receipt of your reply, please let me know in advance of the due date.

6. For your information, the proposed amendment to Annex 6, Part I is envisaged for applicability on 17 November 2011. Any comments you may have thereon would be appreciated.

7. The subsequent work of the Air Navigation Commission and the Council would be greatly facilitated by specific statements on the acceptability or otherwise of the proposals. Please note that for the review of your comments by the Air Navigation Commission and the Council, replies are normally classified as “agreement with or without comments”, “disagreement with or without comments” or “no indication of position”. If in your reply the expressions “no objections” or “no comments” are used, they will be taken to mean “agreement without comment” and “no indication of position”, respectively. In order to facilitate proper classification of your response, a form has been included in Attachment B which may be completed and returned together with your comments, if any, on the proposals in Attachment A.

Accept, Sir/Madam, the assurances of my highest consideration.



Raymond Benjamin
Secretary General

Enclosures:

- A — Proposed amendment to Annex 6, Part I
- B — Response form

ATTACHMENT A to State letter SP 59/4-10/6

PROPOSED AMENDMENT TO ANNEX 6, PART I

NOTES ON THE PRESENTATION OF THE AMENDMENT

The text of the amendment is arranged to show deleted text with a line through it and new text highlighted with grey shading, as shown below:

~~Text to be deleted is shown with a line through it.~~

text to be deleted

New text to be inserted is highlighted with grey shading.

new text to be inserted

~~Text to be deleted is shown with a line through it~~ followed by the replacement text which is highlighted with grey shading.

new text to replace existing text

**PROPOSED AMENDMENT TO
INTERNATIONAL STANDARDS
AND RECOMMENDED PRACTICES**

OPERATION OF AIRCRAFT

**ANNEX 6
TO THE CONVENTION ON INTERNATIONAL AVIATION**

**PART I
INTERNATIONAL COMMERCIAL AIR TRANSPORT — AEROPLANES**

CHAPTER 4. FLIGHT OPERATIONS

4.1 Operating facilities

...

4.1.3 Subject to their published conditions of use, aerodromes and their facilities shall be kept continuously available for flight operations during their published hours of operations, irrespective of weather conditions.

4.1.4 An operator shall, as part of its safety management system, include an assessment of the level of rescue and fire fighting service (RFFS) protection available at any aerodrome intended to be used in order to determine whether the level of protection available is at or above the level appropriate as provided in Annex 14, Volume I, for the aeroplane operated.

4.1.5 When the level of RFFS protection available at an aerodrome referred to in 4.1.4 is below the level required in Annex 14, Volume I, for the aeroplane operated, an operator shall perform a risk assessment in accordance with its safety management system to determine whether or not the operation can be safely conducted.

4.1.6 The minimum level of RFFS protection that is deemed acceptable by the operator at an aerodrome normally used by the operator shall be reflected in the operations manual.

Note 1.— Attachment K contains guidance on assessing the risk associated with aeroplane operation at different aerodromes where the level of RFFS available is below the level required in Annex 14, Volume I.

Note 2.— It is not intended that this guidance limit or regulate the operation of an aerodrome. The risk assessment performed by the operator does not in any way affect the RFFS requirements of Annex 14, Volume I, for aerodromes.

...

Insert new Attachment K as follows:

ATTACHMENT K. RESCUE AND FIRE FIGHTING SERVICES (RFFS) LEVELS

Supplementary to Chapter 4, 4.1.4

1. Purpose and scope

1.1 Introduction

The purpose of this Attachment is to provide guidance on assessing the risk associated with operating an aeroplane at an aerodrome where the level of RFFS protection is below the level required in Annex 14, Volume I, for the aeroplane operated, and on determining whether that risk is operationally acceptable.

1.2 Basic concepts

1.2.1 While all aeroplane operators would prefer the highest level of minimum RFFS to be provided at all aerodromes (as required by Annex 14, Volume I, Chapter 9, 9.2), the reality is that some of the aerodromes currently used do not meet these requirements. Furthermore, Annex 14, Volume I, determines the level of aerodrome RFFS to be provided for aeroplanes normally using an aerodrome.

1.2.2 Even the best equipped aerodromes are exposed to temporary reduction of their RFFS capability. Annex 14, Volume I, 2.11.3 requires that: “Changes in the level of protection normally available at an aerodrome for rescue and fire fighting shall be notified to the appropriate air traffic services units and aeronautical information services units to enable those units to provide the necessary information to arriving and departing aircraft. When such a change has been corrected, the above units shall be advised accordingly.”

1.2.3 To ensure the safety of all operations, Chapter 4, 4.1.4 requires the operator to assess the level of RFFS protection available at any aerodrome intended to be used in order to determine whether the level of protection available is at or above the level appropriate as provided in Annex 14, Volume I, for the type of aeroplane operated.

1.2.4 The following guidance is intended to assist operators in assessing the risk associated with the operation of aeroplanes where the Annex 14, Volume I, provisions are not met. It is not intended that this guidance limit or regulate the operation of an aerodrome.

2. Glossary of terms

Aerodrome RFFS category. The RFFS category for a given aerodrome, as published in the appropriate Aeronautical Information Publication (AIP).

Aeroplane RFFS category. The category derived from Annex 14, Volume I, Table 9-1 for a given aeroplane type.

RFFS category. Rescue and fire fighting services category as defined in Annex 14, Volume I, Chapter 9.

Temporary downgrade. A downgrade of aerodrome RFFS category notified by NOTAM.

3. Minimum aerodrome RFFS category

3.1 Pre-flight planning

3.1.1 In principle, the published RFFS category for each of the aerodromes used for a given flight should be equal to or better than the aeroplane RFFS category. However, for planning purposes, if the aeroplane RFFS category is not available at one or more of the aerodromes required to be specified in the operational flight plan, an operator should ensure that the use of the aerodrome follows the principles of safety management. When establishing acceptable levels of minimum RFFS for these situations, the operator may use the methodology and criteria in Table K-1.

3.1.1.1 Intended operations with RFFS categories below the levels specified in Annex 14 should be coordinated between the aeroplane operator and the aerodrome operator.

Table K-1
Sample table of minimum aerodrome RFFS category

Aerodromes (Required to be specified in the operational flight plan)⁽¹⁾	Minimum aerodrome RFFS category (Based on published aerodrome RFFS category)
Departure aerodrome and destination aerodrome	RFFS category for each aerodrome should be equal to or better than the aeroplane RFFS category. One category ⁽²⁾ below the aeroplane RFFS category may be considered (but not lower than Category 1) if acceptable under the operator's safety management system.
Take-off alternate ⁽³⁾ , destination alternate and adequate en-route alternate aerodromes ⁽⁴⁾	Two categories ⁽²⁾ below the aeroplane RFFS category, but not lower than Category 1.
ETOPS en-route alternate aerodrome	At 30 minutes' notice, RFFS Category 4 or the aeroplane RFFS category, whichever is the lowest, but not below Category 1.

- (1) If an individual aerodrome serves more than one purpose, the highest required category corresponding to that purpose at the time of expected use must be available.
- (2) For all-cargo operations, further reduction might be considered acceptable after an appropriate risk analysis as long as the RFFS capability is adequate to arrest fire in the flight deck area long enough for the crew to safely evacuate the aeroplane.
- (3) When required to be selected.
- (4) An en-route alternate aerodrome required to be adequate and specified in the operational flight plan (e.g. when an en-route adequate alternate aerodrome is selected for application of a reduced contingency fuel calculation procedure).

3.1.2 When defining a methodology for assessing risks and establishing minimum RFFS categories acceptable to the State of the Operator, the operator should include procedures to address temporary downgrades on a case-by-case basis.

3.1.3 In the case of a temporary RFFS category downgrade (i.e. for a maximum of 72 hours, published by NOTAM) at a given destination or departure aerodrome, an operator may, through its safety management system, consider acceptable a reduction to two categories below the aeroplane RFFS category as provided in Annex 14, Volume I (but not lower than Category 1).

3.1.4 In the case of a temporary RFFS category downgrade at an alternate aerodrome required to be specified in the flight plan, an operator may, through its safety management system, consider acceptable a reduction to RFFS Category 4 or two categories below the aeroplane RFFS category, whichever is the lowest, but not below Category 1 capability.

3.1.5 Except in the case of temporary downgrades of up to 72 hours, selection and specification in the operational flight plan of an aerodrome with an RFFS category below those suggested in Table K-1 should be subject to an individual risk analysis using a methodology acceptable to the State of the Operator.

3.2 In flight

In flight, the pilot-in-command may decide to land at an aerodrome where the aerodrome RFFS category is lower than specified in the operations manual if, in the pilot's judgement and after due consideration of all prevailing circumstances, to do so would be safer than to divert.

ATTACHMENT B to State letter SP 59/4-10/6

**RESPONSE FORM TO BE COMPLETED AND RETURNED TO ICAO TOGETHER
WITH ANY COMMENTS YOU MAY HAVE ON THE PROPOSED AMENDMENTS**

To: The Secretary General
International Civil Aviation Organization
999 University Street
Montréal, Quebec
Canada, H3C 5H7

(State) _____

Please make a checkmark (✓) against one option for each amendment. If you choose options “agreement with comments” or “disagreement with comments”, **please provide your comments on separate sheets.**

	<i>Agreement without comments</i>	<i>Agreement with comments*</i>	<i>Disagreement without comments</i>	<i>Disagreement with comments</i>	<i>No position</i>
Amendment to Annex 6 — <i>Operation of Aircraft</i> , Part I — <i>International Commercial Air Transport — Aeroplanes</i> (Attachment A refers)					

*“Agreement with comments” indicates that your State or organization agrees with the intent and overall thrust of the amendment proposal; the comments themselves may include, as necessary, your reservations concerning certain parts of the proposal and/or offer an alternative proposal in this regard.

Signature: _____ Date: _____

— END —