

# The International Federation of Air Line Pilots' Associations



22 September 2020

AIS Community

Dear Madam, Dear Sir;

The International Federation of Air Line Pilots' Associations (IFALPA) is the global voice of pilots. An international not-for-profit organization, IFALPA represents over 100,000 airline pilots in nearly 100 countries. The mission of IFALPA is to promote the highest level of aviation safety worldwide.

On behalf of the global pilots represented by IFALPA, we are reaching out to you with deep concerns regarding aviation safety through information management and presentation, because we believe you play a crucial role in this matter.

NOTAMs (Notices to Airmen) contain information concerning the establishment, condition or change in any aeronautical facility, service, procedure or hazard, the timely knowledge of which is essential to personnel concerned with flight operations. Pilots depend on this information for the safe conduct of our operations and the safety of our passengers.

Within the last 10 years, there has been a significant increase in the volume of published NOTAMs which has led to a situation where the volume of NOTAMs overwhelms the capacity of the end users i.e. pilots and dispatch officers, to review and assess the information in a timely manner. This has resulted in several incidents where safety-critical information was missed. NOTAMs are supposed to support situational awareness but currently, they do the exact opposite. This simply cannot continue; it is unacceptable.

ICAO is working with all relevant stakeholders to design the future System Wide Information Management (SWIM) network and this should improve the NOTAM situation significantly. However, before the new system is in place, there needs to be a reduction of the burden caused by NOTAM proliferation by collaborating with different stakeholders and authorities.

One factor contributing to the increasing cumulative number of NOTAMs is authorizing the publication of NOTAMs which remain in effect in excess of 150 days. As per ICAO Annex 15, NOTAMs should be used only to promulgate information which is *essential* and *temporary* in nature. The widely accepted principle is that information published in NOTAMs should not be valid in excess of 90 days, but the validity can be extended up to 150 days. If the information is valid for this long, in most cases, the information is not of temporary nature, and it should be incorporated into AIPs (or other manuals) or at the very least, should be replaced by an AIP Supplement.

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As these guidelines are regularly ignored, pilots and dispatch officers must, day after day, review the same NOTAMs in excess of 150 days and the volume increases every time an aerodrome adjacent to flown route is added. Pilots have a limited time during the pre-flight briefing (perhaps only 5 minutes) to review the numerous NOTAMs – which may exceed 30 pages on a typical 3-hour cross-continent flight.

Not only are there many NOTAMs, but also too many of them are lengthy and convoluted.

Currently, as of today, there are 38,244 NOTAMs active worldwide<sup>1</sup> and 53.27% of those are older than 90 days. This represents 20,327 NOTAMs and does not account for those NOTAMs that are revised. To circumvent the compliance aspect of long-duration NOTAMs, many States systematically revise NOTAMs after 90 days. Some NOTAMs have been revised like this for years. In addition, there are at the moment 5,163 “permanent” NOTAM. The sheer volume of these types of NOTAM is often the main reason why critical information gets overlooked.

Current filtering capabilities alone cannot fix this problem because another contributing factor to the volume of NOTAMs that we are forced to consume is the ineffectiveness of sorting. We are aware that there is inconsistency in the application of metadata, but even more concerning is the creation of non-approved NOTAM subject and condition codes. This also adds to the burden of our system providers and support-teams and significantly increases the risk of information being missed.

Every State signatory of the International Civil Aviation Organization Convention has the responsibility to adhere to the Standards and Recommended Practices and therefore, every State has a role to play in managing the volume of NOTAMs. We appeal to you to take firm action and to promptly review and remove all published NOTAMs of over 90-day in duration and cease the practice.

The aviation network is a wide field of professionals. Collaboration between all professionals is essential to reach our common goal of safe and efficient operations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jack Netskar', is written over a light blue background.

Captain Jack Netskar  
IFALPA President

<sup>1</sup> Data Source: NOTAMeter, which uses the API Data Service and does not include all NOTAM. Some NOTAM for local dissemination may not be included. Therefore, there were likely more than 38244 active NOTAM at the time this letter was written.

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