

Specific operating regulations



CE-2 Specific operating regulations

Annex 19 Appendix 1



The State shall promulgate regulations to address, at a minimum, national requirements emanating from the primary aviation legislation, for standardized operational procedures, products, services, equipment and infrastructures in conformity with the Annexes to the Convention on International Civil Aviation.

Note.— The term “regulations” is used in a generic sense and includes but is not limited to instructions, rules, edicts, directives, sets of laws, requirements, policies and orders.

2008 FAA IASA FINDINGS



- The CAAI has not kept its operating rules up to date with significant changes in international standards (examples: no obligation to include cabin crew, no FTL for cabin crew, no obligation to include cabin crew, no FTL for cabin crew, no obligation to include cabin crew, no FTL for cabin crew)

- A... parts by reference without... to account for differences... US and Israeli aviation environments

Does not meet international standards

Rulemaking plan




- Rulemaking process sources
 - New / amended [ICAO SARPs](#)
 - Identified gaps *vis a vis* ICAO SARPs
 - Domestic needs
 - Emerging issues



+ Limited organizational resources
= PRIORITIZATION

Annual Prioritization Discussion

- Headed by the DG
- Prepared by the STD. & REG. DEP.
- Issue a “CALL” for initial rulemaking proposals -
 - STD. & REG. DEP. – ICAO SARPs driven
 - HEADQUARTERS DIV. - fees
 - Safety Oversight DIV. - domestic needs driven
 - LEG. DEP. – leg/government driven
- Initial proposals 

Rule making process



CAA Directive GEN 4.0.005
The rulemaking process

Rulemaking Principles



- ICAO SARPs – the basic layer;
- Implementation of performance based SARPs requires robust guidance material;
- Limited CAAI expertise;
- Don't re-invent the wheel;
- Follow an existing proven model (FAA/EASA/TC)
- Positive approach for adoption of ICAO Recommendations
- Consultations with foreign experts



"I thought I was on to something
but I can't figure out how to
move it."

1. PROS & CONS
Adoption by reference Vs.
home made regulations

**2. Criteria in favor of “adopting by
reference”**

Adoption by reference Vs. home made regulations



PROS	CONS
Use of “proven” robust and comprehensive system Less prone to errors	Mixing of sources – potential for contradictions / overlaps / gaps
Tenable position <i>vis a vis</i> the industry	Not adapted to local industry needs
Continuous maintenance in the long term	Less freedom in initiating amendments Revisions require review before implementation
Use of familiar technical terms	Language barrier

Considerations in Adoption by reference

- Distinct technical area
- Technical complexity
- Significant advantage in global uniformity
- Level of expertise of the certificate applicants / holders
- Scope of adaptation needed

Airworthiness Code
(FAR 23-35)

Pilots Training and
Checking (Appendix
E&F FAR 121)

FTL for air carriers
(FAR 117)

EASA EU.OPS (part CAT subpart C section II)
Helicopters Performance & Operating
Limitations code

Annex 14 specific
technical standards

ANR amended 2012-2017



ANR Amended	Content	Promulgated
Amendment to ANR (DOC)/ (OPS)	An. 8	Mar. 2012
New ANR (AMO)	An. 6(1) – 8.7	Feb. 2013
Amendment to ANR(OPS)	An. 6(1) – Air carriers	Mar. 2014
New ANR (serious incidents)	An 13	Mar. 2014
Amendment to ANR(OPS)	Domestic de-regulation - LSA	Oct. 2014
New ANR (Hang-Gliders)	Domestic de-regulation	Mar. 2015
Amendment to ANR(PEL)	An.1 medical assessment	Sep. 2016
New ANR (Measurement Units)	An. 5	Mar. 2016
Amendment to ANR (OPS)	An. 6 – passengers seating	Mar. 2016
Amendment to ANR (OPS)	An. 6 – FTL for Air Carriers	May 2016
Amendment to ANR (OPS)	An. 2 interception	Nov. 2017
New ANR (SMS)	An. 19	Dec. 2017
Amendment to ANR (OPS)	An. 6 – UPRT	Mar. 2018
Amendment to ANR (OPS)	An.6 – EFB	June 2018

Ongoing ANR Amendments



New ANR (Aerodromes) - (Aeronautical Information)	▶	14
Amendment to ANR (DOC) / (REG) – quality assurance for production organizations		8
Amendment to ANR (Transportation of Dangerous Goods)		18
Amendment to ANR (PEL) – UPRT		1
Amendment to ANR (OPS) – CAT by helicopters & small-medium airplanes, aerial work operations, CAT balloon operations		6 + D
New ANR (Aerodromes) - (physical characteristics)		14
Amendment to ANR (OPS) – ULD + Aircraft tracking		6
New ANR (ATOs)		1
Amendment to ANR (FEES)		D
Amendment to ANR (PEL) – Pilot Age		1
Amendment to ANR (OPS)/(PEL)/(DOC)- operation of small unmanned systems		D
Amendment to ANR (OPS) – Rules of the Air		2
Amendment to ANL – Voluntary Reporting System		19



End



New/ amended ICAO SARPs



2011- 201

2012 - 220

2013 – 707

2014 - 587

2015 - 21

2016 – 780

2017-352

2,868

Notice of adoption of
amendment to annex ...

march

Effective
date

July

Applicability
date

November



Initial proposal for IANRs ... amendment

a) Background

1. The current State – informative background
2. Reasons for proposed amendment
3. Substance of the proposal
4. Alternatives
5. Urgency
6. Consequences for CAAI (personnel, budget, technical guidance)
7. Consequences for stakeholders
8. Need for transition period

b) STD. & REG. DEP. opinion

1. Relevant ICAO SARPs
2. Relevant foreign regulations
3. Scope of the proposed amendment

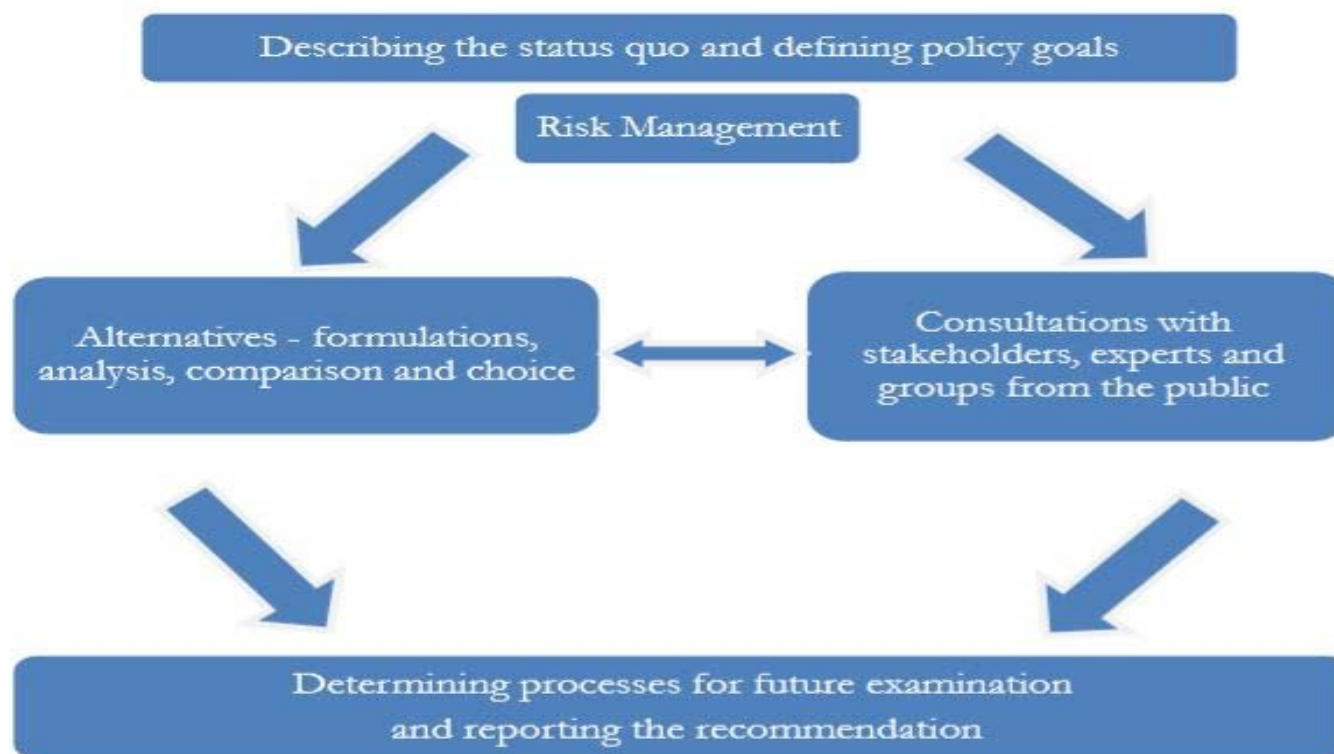
c) LEG. DEP. opinion

1. Is there a legal hindrance for the proposal
2. Recommended instrument for implementation
3. Need for Consultation with/approval by other ministries and bodies
4. KNESSET committee approval required Y/N
5. Scope of the proposed amendment



Regulatory Impact Assessment

- Regulatory Impact Assessment doctrine is a tool meant to help produce optimal regulation



Rulemaking package

- Draft text version (integrated version)
- Detailed explanatory notes – enables discussion on aviation policy and principles
- RIA report
- Comments Form
- Links to relevant foreign regulations
- Presentations
- Comparisons and mappings



Consultations with stakeholders

- Educational / cultural process
- Bring significant operational experience to the discussion
- Enable consideration of variety of operational implications
- Enable to precisely define the gap between current & desired state
- Enable to set adequate transition period
- Enhance confidence and trust with stakeholders



Aerodrome operating regulations



- Perennial project
- Ann 14 (vol.1)
 - Chapter 1- 2 (aeronautical information) – final promulgation
 - Chapters 3,5,7 (physical characteristics) – public consultations
 - Chapters 8-10 (operation of aerodrome) – initial drafting phase
 - Chapters 4,6 - adopted by the Planning and Building Law
- Ann 14 (vol. 2) – TBD due to the fact there is no Intl. heliport in Israel

Aerodrome operating regulations



- Principles for adoption –
 - Scope of regulations – international & domestic aerodromes
 - Understanding the SARPS – who is responsible?
 - Using the following documents to complement the SARPs -
 - Attachment A to annex 14
 - Doc. 9137 “airport services manual”
 - Doc. 9157 “aerodrome design manual”
 - Performance based SARPs – looking into EASA regulations & ...
 - Detailed prescriptive SARPs - Direct reference to the annex
 - Adoption of recommendations as much as practicable

