

## **PE1804/HH**

Civil Aviation Authority submission of 21 January 2021

The oversight of the HIAL program is being undertaken by the CAA as part of its obligations under [Law 2017-373](#).

We hope our response to your letter is useful and gives the committee confidence that the proposal is being considered fully by the CAA, in line with its regulatory framework. While the CAA recognises the impact, the proposal may have for jobs in remote communities, our responsibility is to consider the safety implications. We have responded through that lens and only to the requests within the CAA's competency.

Our oversight team meet regularly with HIAL's project team and to date, the CAA has no major safety concerns with the proposals presented by HIAL.

### **Actions called for in the petition**

#### **Action 1**

The CAA operates within a framework of duties set out by the UK Parliament. This framework means that it would not be within the remit of the CAA to carry out an independent assessment of the economic decisions and decision-making.

As an air navigation service provider, HIAL is certified by the CAA under [Law 2017-373](#), and we oversee the delivery of HIAL's existing services at all of its aerodromes. This includes oversight of its safety management system and approval of its change management processes.

A report was commissioned by HIAL in 2017 and an ATMS scoping study was published in December of that year with the HIAL board indicating its intention to implement in May 2018. In early 2019, a separate study by a different consultancy firm was published and presented to the CAA at the second formal meeting on the HIAL ATMS in April 2019.

As a large multi-site ANSP and aerodrome operator in Scotland, HIAL and the CAA meet regularly to discuss current and future operations and the CAA has been engaged in this project since its infancy. Remote controlling technology itself has been approved within the European Union Aviation Safety Agency (EASA) system since 2015. It has since been deployed at several other sites throughout the United Kingdom, Europe and the rest of the world with plans for further deployments well advanced. Although the topography in this instance is a challenge, there is very little within the HIAL proposal that has not been deployed elsewhere and the principle of a service being delivered from a remote location has been demonstrated to be safe.

#### **Action 2**

The project is split into different deployment points. The transition of Benbecula and then Wick from an air traffic control (ATC) service to aerodrome flight information service (AFIS) is expected later in the programme life cycle but has not yet been part of detailed discussions.

Both aerodromes offer both an ATC and an AFIS service today to manage the safety of life services operating to those remote locations. The volume of air traffic using the aerodromes is low and the CAA view this change as an extension to the current operating provision rather than a seismic change.

The CAA regularly attend both units, either as part of its regular program of oversight or to undertake licensing activities. The CAA has typically found the quality and professionalism of the operational staff at HIAL to be of a high standard and have confidence that the type of service delivered will not detrimentally impact on the safety of those in receipt of that service.

### **Additional questions**

#### **1. What is the process for appraisals of proposals such as the HIAL ATMS?**

The CAA has published a [policy for the approval of remote towers](#) based on content from EASA's Executive Decision [2019/004/R](#). Within the strategy, a number of deployments will take place over several years and each of these will be subject to individual review and approval. Each change will be notified to the CAA and at that stage the CAA will indicate the level of oversight required for that change.

In this case, the CAA has nominated a core team consisting of two air traffic controllers and an air traffic engineer, but has also involved ATC policy specialists, human factors advisors and cyber security experts. The team will review the application, examine specific parts of the project such as training and equipment efficacy and engage directly with the project team to gather evidence that the project is being managed well and can transition safely.

Ultimately the project will produce a "safety case" which is the overall argument put forward by the ANSP to demonstrate safety. For the HIAL ATMS the safety case will be produced in several iterations as each deployment point is delivered. Continuous engagement throughout the project lifecycle assists the CAA in gaining confidence that safety is being considered at the heart of the change. Information and guidance on safety cases can be found in [CAP760](#).

#### **2. At what stage would the CAA "sign off on a project"**

The strategy itself will not be "signed off" by the CAA. Each component part of the HIAL ATMS project will, though, require an overarching "approval" from the CAA prior to transition. In addition, any new equipment deployed, and any ATC staff training or competence plan would also require a separate approval under [Law 2015-340](#). While an approval of a training plan may occur months before the transition date, the overarching approval may not take place until the last few days or weeks before the transition.

#### **3. To what extent the CAA has already considered this project?**

The CAA has engaged with HIAL since the original scoping study was published in 2017. Since 2017, the programme has developed and, as it develops, each deployment has come into greater focus. The initial deployment for the programme is expected to be the transition of the Sumburgh approach radar function to a new facility at Inverness. For this single component, the level of detail has been relatively comprehensive whereas later deployments in the programme are not yet sufficiently detailed to attract our specific oversight. As the programme progresses, we will have greater oversight of each deployment and will expect that any safety concerns we may have are remedied appropriately.

#### **4. What information does the CAA possess regarding consultation?**

The CAA has no specific information regarding consultation on the ATMS project itself other than information available publicly.

There is no CAA regulatory requirement on an ANSP to consult with, either its employees, or local organisations on the strategy itself although an ANSP is required to consult with

users when there is a planned change to the service provided. Three specific deployments of the project may require associated changes to airspace structures and these will be considered through the CAA's seven stage airspace change process, known as [CAP1616](#). As part of this regulatory process the CAA will oversee and access the results of HIAL's stakeholder engagement including its consultation exercises.

**5. At what point would the CAA expect to give a formal verdict on the safety of these proposals?**

The CAA has published a change management and change notification process which allows for the submission of documentation 30 days prior to the change being implemented. Therefore, it is possible that formal approval will not be issued on the change itself until the month before each transition step.

I hope this provides the context from a CAA perspective on HIAL's ATMS programme. The CAA is aware of the significance of this programme to HIAL and to all of those involved. The CAA's role is to oversee and ultimately approve or reject the proposed deployments from an aviation safety perspective. The changes being proposed by HIAL have been successfully deployed elsewhere in the world.