European Union Aviation Safety Agency

Notice of Proposed Amendment 2026-102

issued in accordance with Article 6 of MB Decision 01-2022

Regular update of Regulation (EU) 2023/2117

Repository of civil-aviation-related information

RMT.0749 (SUBTASK 3)

WHAT THIS NPA IS ABOUT	
This NPA proposes to amend Regulation (EU) 2023/2117 which lays down the necessary rules and detailed requirements for the functioning and management of a repository of civil-aviation-related information. This NPA proposes to amend: — Annex I, by removing a number of information objects; — Article 3, Article 4 and Article 8 in relation to the use access interface, reference to data analysis and dissemination of information respectively. The proposed regulatory material is intended to improve the exchange of civil-aviation-related information between national competent authorities, the Agency and the European Commission and allow for a more effective and realistic application of the Regulation.	
REGULATION INTENDED TO BE AMENDED Regulation (EU) 2023/2117	**ED DECISION(S) INTENDED TO BE AMENDED/ISSUED** n/a
AFFECTED STAKEHOLDERS Member States, European Commission, accident/incident investigation authorities, EASA	

WORKING METHODS		
Development	**Impact assessment(s)**	**Consultation**
By EASA	Light	NPA - Focused

RELATED DOCUMENTS/INFORMATION
ToR RMT.0749, issued on 20.6.2024
PLANNING MILESTONES: Refer to Volume II of the latest EPAS edition.

Contents

1. About this NPA

1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) identified an issue (as described in Chapter 2), and after having assessed the impact of the possible intervention actions and having consulted those with the EASA Advisory Bodies, identified rulemaking as the necessary intervention action.

This rulemaking activity is included in the 2026 edition of Volume II of the European Plan for Aviation Safety (EPAS)[1] under Rulemaking Task (RMT).0749, Subtask 3.

EASA developed the regulatory material in question in line with Regulation (EU) 2018/1139[2] (the Basic Regulation) and the Rulemaking Procedure[3], as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for this RMT[4].

When developing the regulatory material, EASA received the input and support from the Member States' Advisory Body (MAB) in its capacity as the 'Repository Steering Committee (RSC)'.

1.2. How to comment on this NPA

The draft regulatory material is hereby submitted for consultation with the MAB in accordance with the ToR for this RMT.

Please submit your comments via email to **rsb@easa.europa.eu**.

The deadline for the submission of comments is **15 May 2026**.

1.3. The next steps

Following the consultation of the draft regulatory material, EASA will review all the comments received and will duly consider them in the subsequent phases of this rulemaking activity.

Considering the above, EASA may issue an opinion proposing amendments to Regulation (EU) 2023/2117[5]. The opinion will be submitted to the European Commission which shall consider its content and decide whether to issue amendments to that Regulation.

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1 European Plan for Aviation Safety (EPAS) 2026 - 15th edition | EASA

2 Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1, http://data.europa.eu/eli/reg/2018/1139/oj).

3 EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 (EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 (by written procedure) | EASA (europa.eu)).

4 ToR RMT.0749 - Regular update of Regulation (EU) 2023/2117 (Repository of civil-aviation-related information) | EASA

5 Commission Implementing Regulation (EU) 2023/2117 of 12 October 2023 laying down the necessary rules and detailed requirements for the functioning and management of a repository of information pursuant to Regulation (EU) 2018/1139 of the European Parliament and of the Council (OJ L, 2023/2117, 13.10.2023, http://data.europa.eu/eli/reg_impl/2023/2117/oj).

When issuing the opinion, EASA will also provide feedback to the commentators and information to the public on who engaged in the process and/or provided comments during the consultation of the draft regulatory material, which comments were received, how such engagement and/or consultation was used in rulemaking, and how the comments were considered.

2. In summary — why and what

2.1. Why we need to act

Since the adoption of Regulation (EU) 2023/2117, the Agency, together with the RSC and the European Commission, identified issues requiring an amendment to the Regulation regarding the list of information objects in Annex I. These issues, if they are not solved today, would require disproportionate investments by Member States and the Agency to enable the exchange of information with no added benefit for safety. The Agency also identified a few issues in various articles of the Regulation, which should be corrected.

2.1.1. Description of the issue

The need to act is driven by priority considerations to enable the most effective manner to upload the necessary information objects to the repository.

Annex I – list of information objects

Various information objects have been identified as not being relevant for exchange through the repository because either the information they bear is considered to bring no added value or they are already exchanged through other means. Some would be very difficult to implement while certain certificates or approvals do not exist. Maintaining these information objects in the repository will require significant investments by the national competent authorities (NCAs) and the Agency which are, because of the lack of added value, considered disproportionate.

In particular, the information objects related to medical data were discussed within the Medical Expert Group that identified that such data exchange is problematic for the following reasons:

— The ‘Application form for pilot medical certificate’ and the ‘Pilot medical examination forms and supporting medical certificates’ are information objects containing sensitive personal (health) data. This would require an increase in information security measures for the entire repository.

— In several Member States, the storage of health data in the reporitory is not allowed by legislation.

— Potentially, a medical broker would be required even if only one Member State is not allowed to store health data in the repository. This further increases the information security risks and will require significant investments. Moreover, the lack of a central storage of data does not allow for the analysis of that data.

— The Medical Expert Group should be given more time to find solutions addressing the storage issue, eliminating the need for a medical broker.

Therefore, the two objects related to medical data should be removed, to avoid the costly and ineffective implementation pending the development of a better solution.

Article 3, paragraph 4 of Regulation (EU) 2023/2117

The repository is designed to <u>store</u> the data sent by the NCAs. However, it cannot be excluded that in the future, certain data will be exchanged <u>without</u> being stored. This would be the case whenever a medical broker solution (as referred to above) would be required. However, the current wording in

Article 3(4) seems to exclude that information — which is exchanged through a broker without being stored — is presented in the user interface.

Article 4 of Regulation (EU) 2023/2117

In accordance with Article 74(1) of the Basic Regulation, the Agency shall establish and manage the repository to 'ensure effective cooperation between the Agency and the national competent authorities concerning the exercise of their tasks relating to certification, oversight and enforcement under this Regulation.' In order to ensure an effective cooperation, it is considered that the analysis of data in the repository is important for various processes like safety data analysis, standardisation activities, rulemaking, etc. However, the Regulation currently does not include any explicit mandate for the analysis of data.

Article 8 of Regulation (EU) 2023/2117

The current wording of Article 8 is such that interested parties may request the Agency to disseminate information contained in the repository. However, the vast majority of the information objects are copies of certificates issued by the NCAs of the Member States; hence, it is expected that also the majority of dissemination requests are related to certificates which are not issued by the Agency. In accordance with Article 4(4) of Regulation (EC) No 1049/2001[6], the Agency would need to consult the Member States (unless it is clear that the document shall or shall not be disclosed).

The second subparagraph of Article 74(6) of the Basic Regulation stipulates that the Commission and the Agency may disseminate the repository's information 'where relevant'. That requirement should be understood to mean that it is relevant for the Agency to disseminate information objects originating from it, namely those issued by the Agency. Conversely, it should not be considered relevant for the Agency to disseminate information objects stored in the repository that were issued by an NCA. In such cases, the NCA is better placed to assess requests for dissemination, since it is not only in possession of the original document, whereas the Agency holds only a copy, but also in a position to assess whether the conditions laid down in Article 8(3) and (4) of Regulation (EU) 2023/2117 are fulfilled.

An amendment of Article 8 would relieve the Agency and the NCAs from the administrative burden, and limit the risk that they both may have different opinions on the validity of the request.

2.1.2. Who is affected by the issue

The affected stakeholders are the European Commission, the NCAs, the safety investigation authorities and the Agency.

2.1.3. Conclusion on the need for rulemaking

EASA concluded, as explained further in Chapter 3 below, that an intervention was necessary and that non-regulatory actions cannot effectively address the issue. Therefore amendments to Regulation (EU) 2023/2117 are required.

[6] Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents (OJ L 145, 31.5.2001, p. 43, http://data.europa.eu/eli/reg/2001/1049/oj).

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. The regulatory material presented here is expected to contribute to achieving these overall objectives by addressing the issues described in Section 2.1.

More specifically, with the regulatory material presented here, EASA intends to ensure that the repository only contains the necessary information objects that can be exchanged, are relevant for the authorised users and bring added value, according to a priority system that ensures the effective cooperation between the Agency and the NCAs. By removing from Annex I those information object categories which have no added value, unnecessary costs for the NCAs and EASA are avoided.

While proposing the amendments to Annex I, the Agency aims at also correcting three specific provisions in the Regulation regarding the user access interface, data analysis and dissemination of information.

2.3. How we want to achieve it — overview of the proposed amendments

The following changes are proposed:

Annex I – List of information objects

16 information objects are proposed to be removed from Annex I:

— Aerodrome equipment certificate

— ATM/ANS systems and ATM/ANS constituents – Statement of compliance

— Decision of a Member State on the designation of a single common information service provider

— Permit to fly

— Permit to fly – approval of flight conditions

— Declaration as provider of training for UAS operators

— Cabin crew medical report

— Maintenance Review Board (MRB) Report approval

— Theoretical knowledge examinations (ECQB)

— Airworthiness directives (ADs), Safety directives, Safety Information Bulletins (SIBs)

— Draft recommendations for reply to ICAO State Letters

— Recommendations for reply to ICAO State Letters

— Alternative means of compliance requests

— Application form for pilot medical certificate

— Pilot medical examination forms and supporting medical certificates

— Maintenance organisation approvals (MOA) – Part M Subpart F EASA Form 3-MF

Amendment to paragraph 4 in Article 3 – Establishment of the repository

Paragraph 4 of Article 3 is proposed to be amended as follows: 'The User Access interface referred to in paragraph 1 shall provide for an online and secure query and read access to the *exchanged information*. (…)' instead of '….the stored information'.

New paragraph 5 in Article 4 – Management of the repository

A new paragraph 5 is proposed to be added to Article 4: 'The Agency may analyse the information in the repository to support the tasks of the Agency and the national competent authorities relating to certification, oversight and enforcement.'

Amendment to Article 8 – Arrangements for the dissemination of information

Article 8 is proposed to be amended to leverage the wording of the Basic Regulation 'where relevant' in Article 74(6) second subparagraph, and to interpret it such that it is only relevant for the Agency to disseminate information that originates from it. This amendment uses the concept of 'competent authority', indirectly requiring the applicant to lodge the request with the competent authority.

Consequential amendments to that of Article 8

New recital

As the competent authority responsible for issuing an information object stored in the repository has the best knowledge of that information object, the responsibility for handling requests from interested parties concerning such information objects should lie with that competent authority.

Amendment to Article 2 – Definitions

(h) 'competent authority' means either the Agency or the national competent authority designated by a Member State, that has issued the information object included in the repository, in accordance with Article 62(4) of Regulation (EU) 2018/1139 regarding the performance of tasks related to certification, oversight and enforcement.

Targeted applicability of the regulatory material

EASA intends to issue an Opinion in 2026 Q2, ahead of the planning in Volume II of EPAS 2026, so that the implementing act can be adopted by 2026 Q4. No transition period or deferred applicability date is provided for.

Legal basis

The legal basis for amending Regulation (EU) 2023/2117 is Article 74(8) of the Basic Regulation.

2.4. Stakeholders' views

Overall, the RSC members largely agreed during its last meeting in February 2026 with the EASA proposals.

— RSC agreed with the removal of the proposed information objects in Annex I.

  An additional survey related to the removal of medical data showed that the members of the RSC agreed with the proposal.

— RSC largely agreed to the amendments to Articles 3 and 4 of Regulation (EU) 2023/2117.

— Even though EASA was still developing the amendment to Article 8 of Regulation (EU) 2023/2117 during the said meeting, the RSC agreed to the envisaged changes.

With regard to the removal of the two medical objects pending the development to address the known issues, the Medical Expert Group was consulted through a survey; twenty-seven out of the twenty-eight respondents agreed with such removal.

2.5. Other relevant information

The proposed amendments in this NPA stem from the rulemaking activity under RMT.0479, Subtask 3.

In 2025, NPA 2025-103 (RMT.0479, Subtask 2) proposed a set of amendments to Regulation (EU) 2023/2117 related to the entry into force and application of Article 18 and to the priority group for a few information objects in Annex I.

After the focused consultation of NPA 2025-103, EASA and the European Commission discussed the overall approach for this rulemaking task, in the context of the rule simplification project. It was agreed that Subtask 2 and Subtask 3 should be merged, leading to a single Opinion.

For that reason, the processing of Subtask 2 has been put on hold and will resume along with the processing of Subtask 3.

3. Expected benefits and drawbacks of the proposed regulatory material

When developing the proposed regulatory material, EASA identified different regulatory options on how to achieve the objectives described in Section 2.2 and assessed their impacts. See Appendix 1 that contains the detailed impact assessment for the changes proposed to Annex I to the Regulation.

Based on the impact assement, two policy options are available:

— Do nothing, and

— Implement the changes as proposed in this NPA.

The impact assessment shows that while there is no impact on safety for both options, doing nothing would lead to a total cost for the NCAs and EASA of €4M over a period of five years.

This rulemaking task was identified as a short-term action under the EASA rule simplification programme. The proposed changes contribute to rule simplification, notably through the cost savings that would be realised for both competent authorities and EASA if the proposals are adopted.

The proposed regulatory material has been developed in view of the better regulation principles, and in particular the regulatory fitness principles.

4. Proposed regulatory material

4.1. Annex I to Regulation (EU) 2023/2117 is amended as follows:

ANNEX I

LIST OF INFORMATION OBJECTS

Information object	Priority groups
Licences	
[…]	[…]
Certificates – Organisations	
[…]	[…]
~~Aerodrome operator certificate~~	~~B~~
[…]	[…]
Certificates – Personnel	
[…]	[…]
Certificates – Products/Equipment	
[…]	[…]
Certificates – Medical	
[…]	[…]
~~Application form for pilot medical certificate~~	~~C~~
~~Pilot medical examination forms and supporting medical certificates~~	~~C~~
Declarations	
[…]	[…]
~~ATM/ANS systems and ATM/ANS constituents – Statement of compliance~~	~~B~~
~~Declaration of provider of training for UAS operators~~	~~C~~
[…]	[…]
Attestations and reports	
[…]	[…]
~~Cabin crew medical report~~	~~C~~
Exemptions	
[…]	[…]
Approvals	
~~Permit to fly – approval of flight conditions~~	~~C~~
~~Permit to fly~~	~~C~~

~~Maintenance Review Board (MRB) Report approval~~	~~C~~
~~Theoretical knowledge examinations (ECQB)~~	~~C~~
[…]	[…]
~~Maintenance Organisation approvals (MOA) – Part M Subpart F EASA Form 3-MF~~	~~B~~
[…]	[…]
Decisions	
[…]	[…]
~~Decision of a Member State on the designation of a single common information service provider~~	~~B~~
Measures	
[…]	[…]
Others	
[…]	[…]
~~Airworthiness directives (AD), Safety directives, Safety Information Bulletins (SIB)~~	~~C~~
~~Draft recommendations for reply to ICAO State Letters~~	~~C~~
[…]	[…]
~~Recommendations for reply to ICAO State Letters~~	~~C~~
~~Alternative Means of Compliance requests~~	~~C~~

4.2. A new recital is added:

As the competent authority responsible for issuing an information object stored in the repository has the best knowledge of that information object, the responsibility for handling requests from interested parties concerning such information objects should lie with that competent authority.

4.3. A new definition is added in Article 2 of Regulation (EU) 2023/2117:

(g) […]

(h) 'competent authority' means either the Agency or the national competent authority designated by a Member State, that has issued the information object included in the repository, in accordance with Article 62(4) of Regulation (EU) 2018/1139 regarding the performance of tasks related to certification, oversight and enforcement.

(i) […]

4.4. Paragraph 4 of Article 3 of Regulation (EU) 2023/2117 is amended as follows:

3. […]

4. The User Access interface referred to in paragraph 1 shall provide for an online and secure query and read access to the ~~stored~~ exchanged information. […]

5. […]

4.5. A new paragraph 4 is added to Article 5 of Regulation (EU) 2023/2117:

3. […]

4. The Agency may analyse the information in the repository to support the tasks of the Agency and the national competent authorities relating to certification, oversight and enforcement.

4.6. Article 8 of Regulation (EU) 2023/2117 is amended as follows:

1. The ~~Agency~~ competent authority may, upon request of an interested party, provide such interested party with the information contained in the repository subject to the specific conditions of use set out in this Article. The interested parties shall address their request to the competent authority responsible for issuing the information object included in the repository.

If the competent authority receives a request for an information object included in the repository, for which another competent authority is responsible, it shall refer the request without undue delay to that competent authority. If the interested party is unable to identify the authority that issued the information object contained in the repository, it shall submit its request to the Agency.

2. […]

3: When receiving a request, the ~~Agency~~ competent authority shall verify that:

(a) the request is made by an interested party; and

(b) the interested party demonstrates that the requested information is strictly necessary to the interested party's own operations~~.~~,

unless that information has been or is publicly available in accordance with Regulation (EU) 2018/1139.

4: The ~~Agency~~ competent authority shall evaluate whether the request is justified and if the conditions laid down in paragraph 5 are met, it shall provide the interested party with the information requested.

5: The ~~Agency~~ competent authority shall provide the requested information to the interested party only under the following conditions:

(a) the interested party does not receive access to the entire content of the repository;

(b) the information is strictly necessary for the interested party's own operations;

(c) no personal data is disseminated unless such data concerns the interested party itself or if such dissemination is strictly necessary to perform the operations of the interested party.

~~6. The Agency shall make available to the authorised users an updated list of requests received and action taken by the Agency.~~

~~7~~ 6. The interested party shall:

(a) use the information only for the purpose specified in the request form;

(b) not disclose the information received without the authorisation of the authorised users;

(c) take the necessary measures to ensure the confidentiality of the information received.

5. Monitoring and evaluation

No specific monitoring or evaluation of the proposed amendments is envisaged.

6. Actions to support implementation

No specific action to support the implementation of the proposed amendments is envisaged.

7. References

n/a

Appendix 1 — Impact assessment

1. Introduction

This proposed amendment is intended to prevent unnecessary costs by removing a number of information object categories from Annex I to Regulation (EU) 2023/2117. Therefore, the impact assessment quantifies the costs for the NCAs and EASA which would likely occur if this regulatory change would not be implemented.

2. What are the possible options

The available options are: do nothing or reduce the scope of Annex I

Table 1: Selected policy options

Option No	*Short title*	*Description*
0		No policy change
1		Remove unnecessary elements from Annex I to Regulation (EU) 2023/2117 as proposed

3. Methodology and data (optional)

(a) Methodology applied

EASA calculated estimates for the implementation costs if policy option 0 (the baseline) is taken, which assumes that none of the information object categories would be deleted from Annex I to Regulation (EU) 2023/2117. The estimates for the implementation by the NCAs are based on a number of assumptions, as reliable data for more accurate calculations is not available. NCAs are welcome to comment on these estimates. For EASA's own costs, a more reliable estimate can be made by drawing a direct comparison with the Priority A information object categories as sufficient experience has been gained from their implementation.

(b) Data collection

EASA sent surveys in 2025 and 2026 to the NCAs before preparing the data models for the Priority A and B information object categories; these surveys included information on the volume of objects which was used for this impact assessment. In addition, data was used which is available in EASA information systems and or reports available at the EASA website. In a limited number of cases (for the object categories 'Declaration as provider of training for UAS operators' and 'Theoretical knowledge examinations (ECQB)'), an estimation had to be made.

The costs are calculated for implementation by the NCAs (including EASA) to establish machine-to-machine connections or alternatively, to upload (low volume data) manually to TRACE. Secondly, the costs for EASA to develop the data models in TRACE are calculated over a five-year period, reflecting both the one-time investment and the recurring annual costs under the multiannual contract.

TRACE IMPLEMENTATION — NCAs

The number of certificates is estimated using surveys sent out to the NCAs, using data available in EASA information systems and or reports available at the EASA website. Estimations are made using the following assumptions:

1. Only one NCA per EASA Member State needs to implement TRACE.
2. 30 % of the EASA Member States (typically the larger ones) use digitalised systems (or will develop a digitalised system) to manage the certificates; these NCAs are referred to as the 'digitalised NCAs'. These digitalised NCAs manage 70 % of the total certificates in the EASA Member States.

   Whenever it is likely that digitalised systems already exist, the calculation will use a lump sum of €10K to connect the systems to TRACE; otherwise, it uses a lump sum of €30K to establish such a system.
3. The remaining 30 % of the certificates will be manually entered by 70 % of the NCAs, referred to as the 'non-digitalised NCAs'.

   When the manual upload costs are higher than the costs to digitalise all of the non-digitalised NCAs, the costs to digitalise all NCAs will be applied.
4. When the Agency is the only NCA, the Agency will opt for either the cheapest solution of manual entry or digitalising the process.

The actual costs are likely to exceed these estimates, as annual maintenance costs have not been included and the number of certificates derived from the surveys may be underestimated, given that complete datasets were not available from all NCAs.

TRACE IMPLEMENTATION — EASA

The costs for EASA to extend the scope of TRACE can be calculated more accurately than the costs for the implementation by the NCAs, because of the experience gained by implementing the first 15 object categories. These costs consist of the preparation of the data model, the costs to extend the 'back-end' (database and APIs), the costs to build the 'front-end' (the user interface) and the costs for testing the entire system. Some object categories have more complex data models, leading to higher costs. In both cases, the costs have been calculated for a five-year period, allowing for both annual and one-time costs to be taken into account.

The implementation of a non-existing object category (Aerodrome equipment certificate) and a discontinued object category (Maintenance Organisation approvals (MOA) – Part M Subpart F EASA Form 3-MF) are not calculated as costs for the NCAs, as there are no certificates to upload. However, EASA would need to extend TRACE with these objects. Similarly, since the deletion of the two medical information objects is considered as a postponement of the implementation, no cost-saving for the NCA is calculated. However, the costs for the implementation by EASA is listed as significantly higher costs than for other information object categories, due to the need for a 'medical broker' and increased information security measures. These extra costs are totally arbitrary and will probably be higher than estimated.

4. What are the impacts

The calculations provided in the tables below show that the estimates for the implementation by the NCAs would lead to a five-year running cost of almost €2.5M, whereas the five-year costs for the implementation in TRACE by EASA would lead to a cost of almost €1.6M.

Therefore:

— policy option 0 (do nothing) would lead to the above-mentioned costs; and

— policy option 1 (amend Annex I to Regulation (EU) 2023/2117 as proposed) would avoid these costs.

(a) Safety impact

In the preparation phase of this NPA, it was already concluded that the object categories which are proposed for permanent removal do not bring any added value, so there is has no impact on safety.

The exchange of the medical objects would have a positive impact on aviation safety; however, if these were to be implemented under the current circumstances, the implementation would be ineffective, expensive and lead to higher information security risks. Therefore, it was agreed with the MAB and the Medical Expert Group that the implementation should be postponed, allowing for investigations on how these object categories can be implemented better.

(b) Environmental impact

No impact.

(c) Social impact

No impact

(d) Economic impact

The economic impact of this regulatory proposal relates to the costs that would be incurred by the NCAs and EASA if the information object categories proposed for removal were to remain in Annex I (i.e. under Option 0, 'do nothing'). The implementation of Option 1 would avoid these costs.

The costs quantified in this impact assessment are predominantly one-off adjustment costs. They represent the investments that NCAs and the Agency would need to make to adapt their information systems and processes to enable the exchange of the relevant information objects through the repository (TRACE). For the NCAs, these costs consist of establishing machine-to-machine connections between national systems and TRACE, or, where digitalised systems do not exist, building such systems or manually entering data. For the Agency, the costs consist of creating the data models, developing the back-end and front-end components of TRACE, and testing the system.

The costs are presented over a five-year period because the implementation of several information object categories requires commitments that extend beyond a single budget year. In particular, the development of IT back-end infrastructure (e.g. SAP-based services) entails multi-annual contractual arrangements, and the phased roll-out of new data models means that implementation efforts are spread over several years.

Table 2: Summary of the average yearly adjustment cost

	Average yearly adjustment costs	Share of total average yearly adjustment costs
Adjustment costs for EASA	€324 320	40 %
Adjustment costs for NCAs	€479 730	60 %

Table 3: Estimated adjustment costs avoided under Option 1 (five-year period)[7]

TRACE IMPLEMENTATION AT NCAS AND EASA							
Administrative activity	**Competent authority**	**Number of certificates**	**Hours per certificate if done manually**	**One-time costs if data already digitalised**	**One-time costs if data to be digitalised**	**Five-year costs**	**Average yearly costs**
Aerodrome equipment certificate	NCA	0	0	€10 000	€30 000	€0	€0
ATM/ANS systems and ATM/ANS constituents – Statement of compliance	NCA	160	4	€10 000	€30 000	€125 674	€25 135
Decision of a Member State on the designation of a single common information service provider	NCA	25	2	€10 000	€30 000	€92 787	€18 557
Permit to fly	NCA	2 900	2		€30 000	€593 292	€118 658
Permit to fly – approval of flight conditions	NCA	1 100	2		€30 000	€392 628	€78 526
Permit to fly – approval of flight conditions	EASA	300	2		€30 000	€30 000	€6 000
Declaration as provider of training for UAS operators	NCA	25	2	€10 000	€30 000	€92 787	€18 557
Cabin crew medical report	NCA	22 000	2		€30 000	€900 000	€180 000
Maintenance Review Board (MRB) Report approval	EASA	30	2	€10 000	€30 000	€6 000	€1 200
Theoretical knowledge examinations (ECQB)	NCA	1 000	2	€10 000	€30 000	€201 480	€40 296
Airworthiness directives (AD), Safety directives, Safety Information Bulletins (SIB)	EASA	500	8	€12 000	€50 000	€12 000	€2 400
Draft recommendations for reply to ICAO State Letters	EASA	7	2	€10 000	€30 000	€1 400	€280

[7] The following hourly rates have been used for cost calculations: €37.16 for competent authorities (Eurostat ISCO-3 default) and €100 for EASA IT resources (average cost of EASA staff and IT consultants).

Recommendations for reply to ICAO State Letters	EASA	7	2	€10 000	€30 000	€1 400	€280
Alternative Means of Compliance requests	EASA	100	8	€10 000	€30 000	€10 000	€2 000
Application form for pilot medical certificate	NCA	0	0	€12 000	€50 000	€0	€0
Pilot medical examination forms and supporting medical certificates	NCA	0	0	€12 000	€50 000	€0	€0
Maintenance Organisation approvals (MOA) – Part M Subpart F EASA Form 3-MF	NCA	0	0	€10 000	€30 000	€0	€0
TECHNICAL IMPLEMENTATION OF TRACE AT EASA							
	Competent authority	**EASA hours for preparation**	**EASA hours for front end**	**EASA hours for testing**	**Five-year SAP costs for backend**	**Five-year implementation costs**	**Average yearly costs**
Aerodrome equipment certificate	EASA	80	248	64	€30 000	€69 200	€13 840
ATM/ANS systems and ATM/ANS constituents – Statement of compliance	EASA	80	248	64	€30 000	€69 200	€13 840
Decision of a Member State on the designation of a single common information service provider	EASA	80	248	64	€30 000	€69 200	€13 840
Permit to fly	EASA	80	248	64	€30 000	€69 200	€13 840
Permit to fly – approval of flight conditions	EASA	80	248	64	€30 000	€69 200	€13 840
Declaration as provider of training for UAS operators	EASA	80	248	64	€30 000	€69 200	€13 840
Cabin crew medical report	EASA	80	248	64	€30 000	€69 200	€13 840
Maintenance Review Board (MRB) Report approval	EASA	80	248	64	€30 000	€69 200	€13 840
Theoretical knowledge examinations (ECQB)	EASA	80	248	64	€30 000	€69 200	€13 840
Airworthiness directives (AD), Safety directives, Safety Information Bulletins (SIB)	EASA	80	312	80	€50 000	€97 200	€19 440
Draft recommendations for reply to ICAO State Letters	EASA	80	248	64	€30 000	€69 200	€13 840

Recommendations for reply to ICAO State Letters	EASA	80	248	64	€30 000	€69 200	€13 840
Alternative Means of Compliance requests	EASA	80	248	64	€30 000	€69 200	€13 840
Application form for pilot medical certificate	EASA	160	500	160	€200 000	€282 000	€56 400
Pilot medical examination forms and supporting medical certificates	EASA	160	500	160	€200 000	€282 000	€56 400
Maintenance Organisation approvals (MOA) – Part M Subpart F EASA Form 3-MF	EASA	80	248	64	€30 000	€69 200	€13 840
EASA						**€1 621 600**	**€324 320**
NCAs						**€2 398 648**	**€479 730**
TOTAL (EASA and NCAs)						**€4 020 248**	**€804 050**

In addition to the one-off adjustment costs quantified above, the continued inclusion of these information object categories in Annex I would, once implemented, give rise to administrative costs for NCAs. These would stem from the obligation to keep the repository data up to date (e.g. uploading new certificates, updating existing records, and removing expired ones on an ongoing basis). Such recurring activities constitute administrative obligations and would represent recurring administrative costs on the NCAs.

However, since the information object categories in question have not been implemented in TRACE, and the purpose of this regulatory proposal is precisely to prevent their implementation, these administrative costs have not been incurred and will not materialise under Option 1. In accordance with the principle of proportionality, to avoid spending resources on an analysis with a self-evident outcome, a detailed quantification of these future administrative costs has not been undertaken. Their magnitude would in any case be very small relative to the one-off adjustment costs presented above, as they would consist primarily of staff time for routine data entry and maintenance activities across a limited number of records.

Under Option 0 (‘do nothing’), the total estimated adjustment costs over a five-year period amount to approximately €2.4 million for the NCAs and approximately €1.6 million for the Agency, resulting in a combined cost of approximately €4 million. Under Option 1 (‘amend Annex I as proposed’), these costs are avoided with no negative impact on safety.

(e) General Aviation and proportionality issues

No impact.

5. Conclusion

(a) Comparison of the options

As outlined above, doing nothing would require the implementation of information object categories which do not exist, have no added value or of which the implementation under the current circumstances would require significant investments while being ineffective.

Table x: 'Comparison of the options'

Impact criteria	***Option 0 'do nothing'***	***Option 1 'amend Annex 1'***
Safety impact	No impact.	No impact.
Economic impact	Cost would be incurred as planned if there would be no amendment to the Annex I.	Estimated savings amounting €4M over five years.

(b) Question to stakeholders

Stakeholders are invited to provide any other quantitative information they find necessary to bring to the attention of EASA. EASA will consider that information when finalising the impact assessment.

Appendix 2 — Quality of the NPA

To continuously improve the quality of its documents, EASA welcomes your feedback on the quality of this document with regard to the following aspects:

Please provide your feedback on the quality of this document as part of the other comments you have on this NPA. We invite you to also provide a brief justification, especially when you disagree or strongly disagree, so that we consider this for improvement. Your comments will be considered for internal quality assurance and management purposes only and will not be published (e.g. as part of the CRD).

1. The regulatory proposal is of technically good/high quality

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

2. The text is clear, readable and understandable

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

3. The regulatory proposal is well substantiated

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

4. The regulatory proposal is fit for purpose (achieving the objectives set)

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

5. The regulatory proposal is proportionate to the size of the issue

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

6. The regulatory proposal applies the 'better regulation' principles[1]

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

7. Any other comments on the quality of this document (please specify)

[1] For information and guidance, see:

- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en
- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en