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## Assessment of response to safety recommendations (RL 2016:05)

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On 2 September 2016 the Swedish Accident Investigation Authority (SHK) published a report, RL 2016:05, concerning an accident at Malmö Sturup Airport on 27 June 2015 involving aircraft SE-GIC of model Piper-PA34-200T, Seneca II. In the report SHK issued two safety recommendations to EASA. EASA was recommended to:

- *Identify exercises in flight training that might entail an increased risk factor and to issue Guidance Material (GM) for the practical execution of these. (RL 2016:05 R1).*
- *Investigate the conditions for the installation of operational CCTV cameras for investigative purposes at European commercial airports that are covered by EASA's regulations under Regulation (EC) 216/2008. (RL 2016:05 R2)*

On 24 November 2016 SHK received the EASA reply to the recommendations.

According to Article 18.2 regulation (EU) No 996/2010 of the European Parliament and of the Council on the investigation and prevention of accidents and incidents in civil aviation, the safety investigation authority shall inform the addressee whether or not it considers the reply adequate and give justification when it disagrees with the decision to take no action.

The response SHK has obtained from the EASA regarding recommendation RL 2016:05 R1 cannot be regarded as fully addressing the deficiencies reported. SHK is of the opinion that the EASA has too great trust in the individual flight schools' quality and safety management systems and their ability to identify and deal with risks. Risk assessment is not an exact science and the assessment of the level of risk of any one exercise may vary depending on the assessor. It can also be difficult – before an accident occurs – to contend that the exercise is too hazardous to be conducted.

The fact that an exercise has been conducted previously without consequences or incidents is often accepted as evidence that it is safe. This is not necessarily the case, which the investigation clearly demonstrates. Accordingly, there are grounds

from a safety perspective to set out a framework for how training exercises are to be conducted, i.e. indicate in an overall plan what risk levels are acceptable and may not be exceeded.

In contrast to the EASA, SHK does not believe that the basic risk evaluation in exercise plans should be allowed to vary between different flight training organizations. However, the individual exercises may – during implementation and within this framework – need to be adapted on the basis of factors including the current weather conditions, the aeroplane's performance and how experienced the instructor and students are. The guidance material would thus not replace the flying schools' own safety management systems, instead it would set limitations for what activities are undertaken.

In the light of this, SHK is still of the opinion that guidance material would make it easier for, above all, smaller flying schools to conduct accurate risk assessments and draw up a syllabus that does not contain unacceptably high risks to the students.

However SHK acknowledges the work EASA is undertaking to support the competent authorities of the Member States in the frame of their oversight responsibilities, inter alia sharing best practices for approval of training syllabus, analysing the course structure and linking specific training to the aircraft used.

SHK considers the response to the recommendation as partially adequate.

Regarding the recommendation RL 2016:05 02 SHK considers the response to the recommendation as adequate.

Best regards,



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Chair Accidents Investigations