Conclusions of 2012 EASA Safety Conference

(from the closing speech of Thomas Mickler, EASA, Head of Standardisation Department)

As it was pointed out during the introduction, the purpose of this conference was to exchange ideas, experiences and opinions with you, and to identify and discuss critical issues. - We have certainly accomplished that!

And as a result – I hope - we have all reached a higher level of understanding and awareness for the very topical issues connected to the transition process towards performance based regulations and oversight. This in itself would, in my view, constitute a very important outcome of the conference.

But, let us reflect and try to capture some of the highlights of this event:

- As the nature of the rules continue to change from prescriptive to performance based regulations, the way regulatory compliance is being assessed has to change as well.

- Performance Based Oversight will ensure regulatory compliance as well, however, it will do it in a completely different way. It will concentrate more on the effectiveness of SMS. It will lead to a compliance optimisation of oversight activities.

- Performance objectives and KPIs will form the basis for decision making processes, although there is still a debate on what constitutes good KPIs. As we heard, this is an area that is the least mature, and we need to place more effort on how to define good KPIs.

- If we simply rely on KPIs, we will fail. Inspector judgement is crucial.

- It is evident that the transition process will be incremental and last for many years to come, and it seems that in some areas it may even be advisable to remain with a prescriptive set of rules.

- Evolving to a performance based oversight requires as a precondition that States have successfully implemented first a sound compliance based safety oversight mechanism. With other words “Don’t run before you can safely walk”. And even under PBO system compliance remains essential.

- The human element plays a crucial role in the system. The qualifications of our inspectors have to be reviewed and inspectors need to be prepared for the new challenges.

- We need to develop consistent and good training programmes. EASA was expected to play a central role as training provider.

- The biggest challenge probably lies in changing the people’s minds. Performance based oversight does not only require different qualifications for inspectors, it requires a cultural change – people have to accept it – and eventually they have to “live” it. It was mentioned in several presentations, that culture is everything. But it was also stated that it can be lost in a moment.

- In addition the competencies of inspectors must evolve to become a sparring partner of their counterparts. This means additional skills and comprehensive understanding at system level.
- I think it is safe to conclude that in a performance based oversight systems, we are more dependent on data and information. What’s most important here, is to share the intelligence rather than the sheer mass of raw data, and we need to agree on the right “picture resolution” to support the decision making process. Therefore we need adequate support tools that allow us to properly analyse and make sense of the data and information they receive in order to take the right decisions.

- A performance based system is also very vulnerable to reduction of resources following governmental budget cuts. Since a lot more effort goes into the collection, analysis and monitoring of safety relevant data, a cut of resources might probably affect the oversight capability of an Authority even more negatively than under today’s approach.

- I think it became clear that through introduction of a performance based oversight system we will increase the effectiveness of the oversight activity more than its efficiency. If the motivation to introduce PBO is simply to reduce resources, than it should not be done, because it is likely to fail.

We also realised that there are also a number of controversial issues:

The role and the work done by supranational organisations such as EASA appears to be seen critical, (and that should be a concern to us!)

All in all, I think to have heard from the panel that we go into the right direction, but there is a whole lot more that we have got to do.

The outcome of this conference will definitely guide our future work here at EASA. We will analyse very carefully what was said during the conference and take the lessons learnt into consideration in our deliberations and action plans. I am sure the EASP, particularly the block on supporting the implementation of SMS, will benefit from this conference.

It has become evident that the road to Performance Based Oversight has to be travelled together. EASA is looking forward to travelling this road with you, and we will be happy, if our mechanisms and working groups can serve as a shared “vehicle” that can accommodate everybody rather than let you walk the road alone. I would also like to thank ICAO for the excellent work done over the last couple of years, for its farsightedness and its leadership in guiding us the way.

As was emphasised by IATA, aviation is a global business and how important cooperation of all stakeholders is! We all have to form a partnership for safety.

So I hope, I have summarised and highlighted all important aspects, and should I have missed some or reproduced them from my personal perspective, then I deeply apologise for that.