

# Safety Recommendations' traceability

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# Background

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- ✓ Since 2009: **Increasing number** of safety recommendations addressed to EASA and for which **rulemaking action** has been **requested by the SIAs**
- ✓ Work on **Continuing Airworthiness** has narrower impact and tends to be implemented **shortly afterwards**
- ✓ **Rulemaking activities** including those relating to safety recommendations can take **years**
- ✓ EASA only has a **regulatory remit for proposals** to the Commission
- ✓ **“Third parties” increasingly question the BEA about the effectiveness of safety action**

# As a consequence

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- ✓ EASA considers its action as “closed” with regard to a related safety recommendation, since the agency’s opinion has been issued to the Commission, without presuming the possible:
  - ✓ full rejection,
  - ✓ or acceptance,
  - ✓ or any partially agreed measureduring its opinion’s transposition into a rule, by the Commission.
- ✓ Effectiveness of Commission regulations with regard to safety issues:
  - ✓ Lack of traceability and feedback for SIAs ?



# Current situation

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- ✓ The **Commission** actually has the **power to rule**
- ✓ **SIAs and the network** have **no direct feedback** from the Commission nor EASA to check whether the opinion has been “fully” transposed into a rule with the amendments’ SRs related
- ✓ The provisions of EU 996/2010 correspond to an **administrative process of safety recommendation** handling and responses follow-up



**without traceability** of safety action enforcement by the European legislation.

# Possible ways of traceability improvement

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- ✓ **Insertion** of Safety Recommendations references into the backgrounds of NPAs and Opinions addressed to the Commission?
- ✓ **Reiterating** and **mention** by the Commission of the considered SRs' references in the new and/or amended IR?
- ✓ **Set up of a permanent structure**, within or in liaison with the Commission, which **ensures and informs the Network** that the safety action proposed by a SIA and echoed / relayed by the channels of EASA's opinion has been really enforced by the Commission?

# Questions

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- ✓ **Up to which step** to follow-up recommendations or effectiveness of a safety action?
- ✓ **Define** common closing action criteria relating to safety recommendations within the scope of rulemaking action?



# BEA

Bureau d'Enquêtes et d'Analyses  
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