

[Strategy and Safety Management]

[Safety Intelligence Performance department]

Report

5th IORs Workshop: Implementation of R376/2014 in organisations approved by the Agency

Cologne, 4th of December 2014

Final

"The information contained in this report is intended for internal communication and documentation of work in progress. Such information is not necessarily definitive, has not been authorised for distribution outside the premises of EASA and consequently the Agency cannot be held responsible for any damage resulting from unauthorised use of this information. If you rely on this information for purposes other than its intended use, you assume all risk associated with such use."

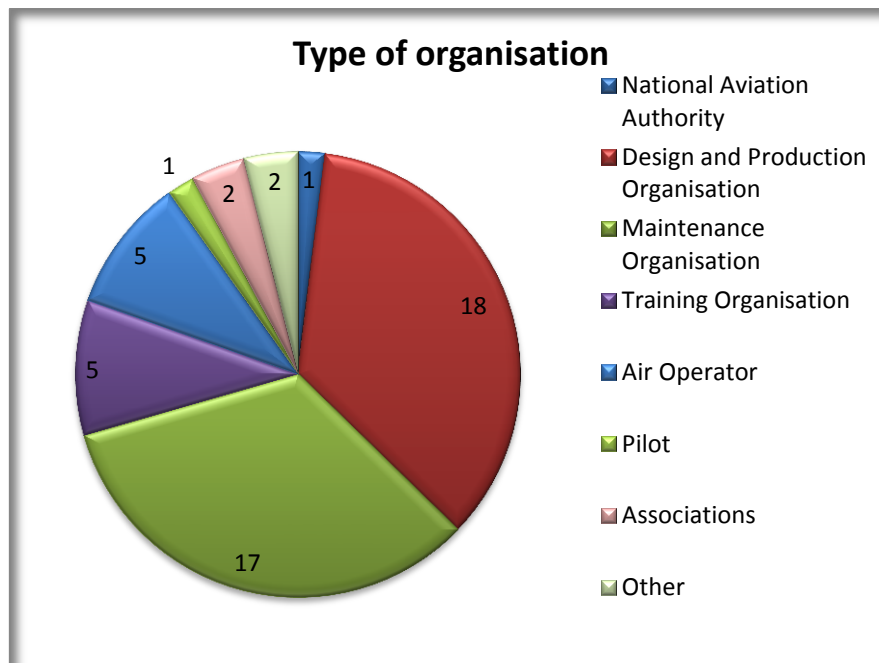
Table of Contents

Table of Contents	2
1 Respondents.....	3
2 Primary objectives of the participants	4
3 Level of satisfaction.....	4
4 Comments	5

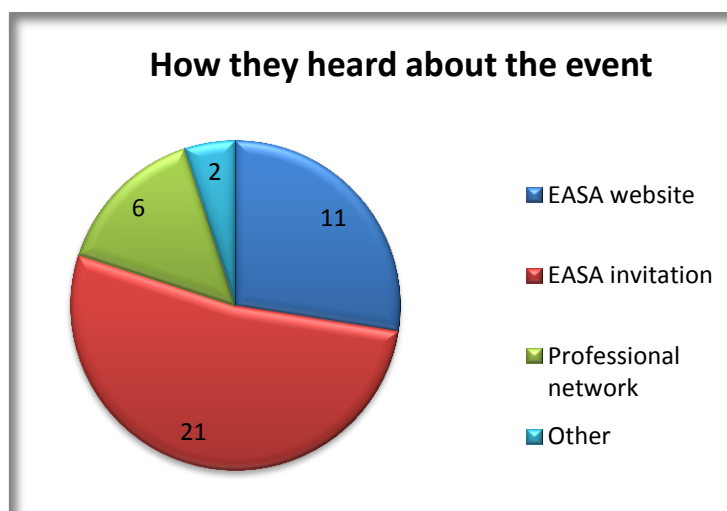
1 Respondents

The conference took place on the 4th of December in Colgone 110 participants attended this conference and were contacted to provide their feedback. Among the participants, 36 answered the survey, which gives an **answer rate of 33%**. Due to the low rate of participation in the questionnaire the results will be presented in values and not in percentage.

The distribution of respondents in terms of type of organisation is presented in the graph below. It must be noted that they had the possibility to select more than one answer to this question.



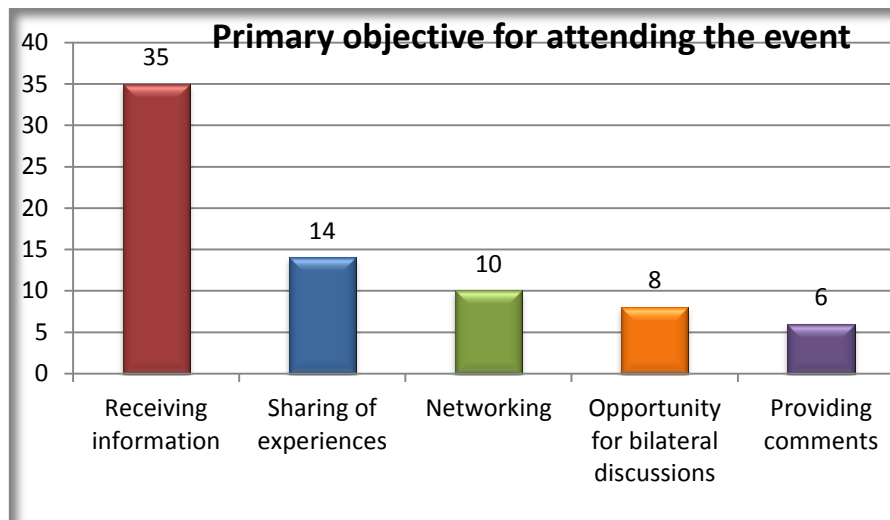
To the question “How did they hear about this event”, in many cases participants were informed both by an invitation from EASA and through the professional network. Those under category “Other” came in representation of their Managers.



[ED.3]

2 Primary objectives of the participants

The main purpose for the participants to attend the Workshop was receiving information. It must be noted that they had the possibility to select more than one answer to this question.



For **35** respondents (97%) the discussions, in particular the afternoon session, were useful.
 For **33** respondents (92%) the workshop was beneficial in terms of content and outcomes and they received the clarifications expected.

3 Level of satisfaction

The level of satisfaction, both regarding organisation and content is very positive ranging from **89%** to **81%** respectively.



4 Comments

The feedback on the event is in general very positive. Participants have commented on the presentations considered more effective and gave feedback on those questions that were not answered and/or were not addressed during the workshop:

On the presentations:

- New requirements on EASA (IORS/Safety Analysis – Santiago Haya Leiva) – clear presentation, very good summary with regard to the new R376/2014 and a useful planning of the work to come. Some questions that were not clear before (during previous workshops) were answered;
- The implementation for approved organisations under BR216/2008 - the most relevant to my job, describing the changes EASA is implementing in practice for the Industry;
- It was very interesting to hear Ms Micheaux-Naudet presentation on the Commission's views, although most difficult points were only rapidly covered (e.g. penalties). There was an apparent will to progress on the issues raised by the industry (as presented by Patrice Chassard for ASD);
- The multi-pack by Delphine Micheaux Naudet because it contained very important information, except the one that we had nothing to say about R376/2014, as we were only invited to discuss the lists of occurrences, e.g. Aircraft Technical and Repair and the list of operational aspects for sailplanes, balloons and non-complex motor-powered aircraft. We were repeatedly told that we had nothing to add to or to delete from the future R376/2014 when we prepared our text published on 4 and 5 February 2014. The 4th December audience most probably was not aware of this fact;
- The presentation from the Industry representatives were also valuable as they offered exchanges between Industry, EASA and EC; good discussion about the lack of feedback when making an occurrence report. I look forward to the improved processes going forward.
- As an Air Operator mostly interested in the practical implementation of the regulation and the impact on our current occurrence reporting system, the most interesting presentations were "Why a new regulation on Occurrence Reporting", "Implementation of R376/2014" and "New Requirements on EASA".
- Though the presentations explaining the detailed aspects of EU Regulation 376/2014 were informative, the most effective presentation was definitely that of Werber Scholz, which described the likely impact of the regulation on the glider community. Werber's presentation highlighted the apparent discrepancy, as perceived by industry to-date, between the demands of the regulation and what value the IORS process does or, more specifically, doesn't add to safety;
- John Franklin's presentation, very understandable;
- Benefit, information, perspectives – were gleaned from all presentations;

- Presentation from the Glider Association - was very interesting as it provided an external view from a community that promotes "less regulation";
- Presentations from EASA representatives were informative but in some respect did not clearly show all details - this was nevertheless explained later during the discussion sessions;
- Discussion between the audience and the panel was useful and engaging. It helped to understand the issues with regards to the implementation of new regulation on IORS. Discussions between regulator, EASA in this case, operators and TC holders need to be held more often, and should be held prior to the issuance of a new regulation so that any safety issues can be highlighted beforehand and the new regulation can be implemented with preventive actions rather than corrective actions.

Questions that were not answered:

- How will the VORs be managed? Which will be the feedback towards the Manufacturers?; How will VORs and MORs on the same event be "coupled" in the ECR?;
- The Rule needs a monitoring of the implementation of the Corrective Actions in service. What can a Manufacturer do when the Customers often don't provide any feedback to the Company? Shall the Manufacturers be responsible for this implementation?;
- Part 21 is supposed to be modified in the near future to accommodate requirements for SMS in design and manufacturing published in ICAO Annex 19. Should we expect some interactions between these future changes and the reporting requirements resulting from both 216/2008 and 376/2014 regulations?
- How voluntary reporting and culture fit together. Implementing the "voluntary reporting" provisions of R376/2014 could create a climate of mistrust if it misused by people not willing to discuss occurrences openly. Do you share our perception that "anybody reporting anything" has the potential to create mistrust in organisations of any form and any kind?;
- Examples of how the IORs improved safety could not be presented;
- I would have liked a more developed answer to my question to Rachel Daeschler about follow-up reporting (Art 13). She acknowledged that the timescales prescribed in 376/2014 aim to cater for the various types of reporting organisations and recognised that investigations carried out by TC Holders usually require more time to complete. Please can EASA ensure that, in this respect, the forthcoming guidelines clearly reflect its expectations?;
- Art 6, item 1 In what manner does the person need to handle details of occurrence reports "independently"? Please clarify;
- As a non Member State there should be an item in the agenda to clarify the EASA requirements for NON Member states, too. I had a chance to talk with some EASA personnel to clarify some questions;
- A clarification might be made between the new regulation R376-2014 and R216/2008 for those organizations;
- A clear view on how EASA wants to use the IORS database for statistics, trends and

[ED.3]

detection of safety issues was missing;

- I look forward to seeing which "voluntary" occurrences EASA is waiting to be submitted. I struggled to understand this aspect of the presentation;
- Data sharing: this should only be possible between EASA, authorities and investigation bodies. On the other hand, approved organisations (CAMO's, AMO's and in future DOA's) shall implement a SMS with hazard identification and risk assessment. I see a great problem regarding risk assessment of hazards without the availability of industry data, especially the calculation of risk probability. Can you please provide guidance, how risk assessment should be accomplished without industry data?;
- R376/2014 is not applicable for approved organizations at non-MS although reporting is mandatory for all POA and DOA as per 748/2012 (MOA should also be considered for Non-MS). The subject should be clarified to prevent misunderstanding situations. Because non MS approved organizations shall perform reporting i.a.w applicable regulations (748/2012). In addition to this, is 216/2008 applicable for non-MS organizations approved by EASA (POA/MOA/DOA)?. Reportings between the organizations, NAAs, EASA should be clarified/detailed based on approval holder status (i.e. MOA, POA, DOA);
- How will EASA handle the double reporting? Eg an operator reports an event to MS and TC/STC holder. MS reports to EASA and TC/STC holder reports to EASA. 2 reports from one event;
- What happens after reporting an occurrence, i.e. is there any feedback from EASA about actions, status, etc., to the reporting organisation foreseen or will this be visible in the ECR?;
- Which interfaces and processes between EASA and Industry are foreseen for each single occurrence? Will this be more detailed stipulated in the guidance material?;
- Have all occurrences to be reported even if originated by hazard and/or without having verified cause and/or safety impact due to lack of informations or missing suspected part and appliance for further investigations from operations?

[ED.3]

