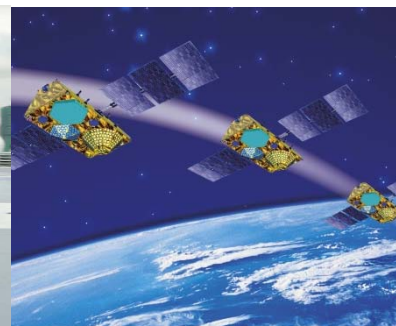


ASD Feedback on Occurrence Reporting Regulation EC 376/2014 implementation

IORS meeting – 21st June

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BACKGROUND

- ❑ 376/2014 Law was issued on April 2014
- ❑ During a meeting in December 2014, consequent on Regulation 376/2014 issuance, ASD presented its “views” at posteriori...
- ❑ This presentation provides the ASD feedback compared to concerns raised at that time.
- ❑ Thanks to ASD members for their contributions



POSITIVE OUTCOMES

- ❑ It is welcomed the harmonisation between the both regulation 216/2008 and 376/2014 as clarified by
 - ❑ Annex II of IR 2015_1018
 - ❑ GM V1 (Dec 2015) including some of comments done by ASD.
 - To consider only Unsafe condition
 - To report 3 days after the Unsafe Condition is determined and not from known.
 - To provide Risk Assessment within 30 days.
 - To perform a single report through IORS.



POSITIVE OUTCOMES

- ❑ It is also welcomed the initiatives taken to have a better reporting (collection of events) in number and accuracy thank to:
 - ❑ “Just Culture”
 - ❑ Mandatory reporting from operators
 - ❑ Quality requirement versus this reporting

- ❑ ASD organisations considered such as a real improvement to reach the targeted Safety Objectives.



DIFFICULTIES ENCOUNTERED

Investigation

- ☐ Law address the reporting (collection of events) but not the support of occurrence analysis (Investigate).
- ☐ No mandatory commitment from reporter to support investigation:
 - ☐ To provide removed parts instead of scrapping it
 - ☐ Records data files, erased during subsequent flights;
 - ☐ Damage description; Cracks length; orientation
 - ☐ Pictures
 - ☐ Maintenance history....
- ☐ More and more “Lack of Data” occurrences where closure is performed in only on suspected scenario.



DIFFICULTIES ENCOUNTERED

Final investigation - Target

- ❑ As per Article 13: “The organisation certified or approved by the Agency shall transmit to the Agency the final results of the analysis, where required, as soon as they are available and, in principle, no later than three months from the date of notification of the occurrence. “
- ❑ 90 days for final analysis remains considered not possible (Non sense) in the real life.



DIFFICULTIES ENCOUNTERED

IORS Spec - Mandatory fields

Occurrences from the field / In Service Occurrences

- ☐ Reports quality performed by DAH through IORS is directly linked to operator feedback accuracy.
- ☐ Occurrences are reported by external bodies; for the majority outside European regulation.
 - Completeness of the reports not in line with 376/2014.
 - Some information required for mandatory fields are generally not included (Call sign...).
- ☐ But quality of reports to ECR remains relevant from Article 21.
- ☐ In addition, it led to many questions that cannot be answered by the DAH (ex: Wrong Runway Numbers) and not really relevant for technical investigation.



DIFFICULTIES ENCOUNTERED

IORS Spec - Mandatory fields

Occurrences from Engineering or Manufacturing

☐ Some Mandatory fields considered non relevant:

- State/area of occurrence
- Location name
- Planned destination
- Last departure point
- Flight phase
-

☐ Not clear use between blank, Unknown...;

- What about value for numerical field Blank not working
- Unknown injuries = 9999999?
- Value list not-complete or not correct.



DIFFICULTIES ENCOUNTERED

IORS Spec - Mandatory fields

☐ Tools update

- ☐ Optimisation performed in the tools to reduce the number of manual inputs by used of internal organisation data bases and transfer tables.
- ☐ Significant development costs despite the low impact presented at the beginning.

☐ Input data

- ☐ Remains some mandatory fields to be manually recorded.
- ☐ Input writers trainings
- ☐ Effort to recover information
- ☐ Recurrent costs and resources required



DIFFICULTIES ENCOUNTERED

IORs Spec - Mandatory fields

- ❑ ASD position is therefore, to request a review of the list of “Mandatory” IORS fields for DAH report to remove the ones presenting low contribution in investigation.
- ❑ In addition, those fields are, for European operators, already provided from the source.
- ❑ Significant reduction in recurrent workload is expected.



DIFFICULTIES ENCOUNTERED

Taxonomy

- ☐ Mandatory “Events Type” and “Occurrence category” fields ECCAIRS taxonomy.
- ☐ As stated in ASD views, confirms a non-obvious implementation.
- ☐ Difficult to be filled due to the very long and multiple levels Value List (Event Type).
- ☐ Presents a significant additional workload for input writers needing a specific competence.
- ☐ Need to train specifically persons.
- ☐ Alternative through Text mining tools, more adapted to Big Data, may exist.



DIFFICULTIES ENCOUNTERED

Other points

- ☐ Form only available on Pdf, other applications to be also covered.



DIFFICULTIES ENCOUNTERED

Occurrence outside
Organisation scope

☐ **Regulation 376/2014 prescribes potential reporters to report defined occurrences they are aware of.**

☐ Case of issue linked to STC for Design organisation.

- Often discovered by chance (investigation result).
- Initial Reporting can be done on assumption only.
- No analysis can be provided as not informed on STC design.

⇒ Way to inform without a formal IORS report.



FUTURE IMPROVEMENT

- ❑ Reporting files are currently sent by mails and analysed by an automate on EASA side.
- ❑ Linked to fleet increase, new Multi-media technologies (movies, animation...), requirement for a better reporting from our operator...reporting files will become bigger and will reach the mail capacity limit (10Mo).
- ❑ New exchange platform, FTS use have to be considered.
- ❑ Concept of “Digital continuity” with EASA although targeted for certification document may be also considered (SEPIAC)



Questions

- ☐ Clarification on how the data collected are used?
- ☐ How results are analysed?
 - Possibility to let Stakeholders to interpret or clarify the context.
- ☐ How results are shared?
- ☐ Concerns remain on Data Security on information provided ?



CONCLUSION

- ❑ Significant investments were and are done by organisations to cope with the new regulations and IORS specification.
- ❑ After One year, as lessons learned, ASD proposes to review the main following points:
 - To mandate operators support for investigation
 - To review/decrease the list of Mandatory fields for DAH
 - To review the need for ECCAIR taxonomy as defined.
 - To propose a new platform for report.

CONCLUSION

- ❑ ASD appreciates the continuous and valuable exchanges and support from EASA and EU to ease the implementation of the Law in the different organisations.
- ❑ Such exchanges would have been, may be, happened before the issuance of the law.