EUROPEAN PLAN FOR AVIATION SAFETY (EPAS)

VOLUME III
Safety Risk Portfolios
2024 Edition

European Union Aviation Safety Agency
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1. Introduction: the basis of the EPAS safety mitigation

What is this volume about?
Volume III of the EPAS aims to present how aviation safety risks in Europe are analysed and the outcome of these analyses (i.e. where the risks are), with the purpose of providing readers with more insight on where the actions in the EPAS come from.

You can use the volume to:
• understand more about the accident outcomes and safety issues that are the focus of the EPAS;
• use the information on the safety issues to inform decision-making in your own organisation.

The European Safety Risk Management (SRM) process
The main safety risks and corresponding mitigating actions feeding the EPAS are developed through the European SRM process. This comprises a set of processes that aim to identify the safety issues¹ and their mitigations. It involves analysis of data from different sources and collaboration with safety partners from national aviation authorities and the industry (through the Collaborative Analysis Groups (CAGs) and the Network of aviation safety Analysts (NoAs)²).

The SRM process follows five specific steps:

![The European SRM process diagram]

Figure 1-1: The European SRM process

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¹ Safety issues are safety deficiencies related to one or more hazards. They are the actual manifestation of a hazard or a combination of several hazards in a specific context. They can be assessed in terms of risk and practically managed (mitigated). The level of granularity of a safety issue should not be too detailed, in that it would then be controlled by selective and reactive operational mitigating controls, such as airworthiness directives (ADs) or safety directives (SDs). It should also not be too general, which would render its mitigation unfeasible in an acceptable timeframe.

² For easy reference, the ‘network of aviation safety analysts’, as referred to in Regulation (EU) No 376/2014 of the European Parliament and of the Council, is abbreviated as ‘NoAs’.
Identification of safety issues: The identification of safety issues is the first step in the SRM process, and it is performed through the analysis of occurrence data and other safety-related information and supporting information by the CAGs. These safety issues are formally captured by the Agency and are then subject to a preliminary safety assessment. This assessment then informs the decision on whether a safety issue should be formally included within the relevant safety risk portfolio or be subject to other actions. Advice is taken from the NoAs and the CAGs. The output of this step in the process are the domain safety risk portfolios. Within the portfolios, both the key risk areas and safety issues are prioritised.

Assessment of safety issues: Once a safety issue is identified and captured within the safety risk portfolio, it is subject to a technical safety assessment. These assessments are prioritised within the portfolio. The assessment process is led by the Agency and is supported by the NoAs and the CAGs. In addition, group members are encouraged to participate in the assessment itself. This collaborative approach with the Agency’s safety partners is critical to achieving the best possible results. Together, this forms the Safety Issue Assessment (SIA), which provides potential mitigating actions for the EPAS.

Definition and programming of safety actions: This includes an impact assessment through the best intervention strategy (BIS) document, defining possible mitigation actions, assessing the implications and benefits of each possible action, and making recommendations on the best mitigation action(s) to be implemented in the EPAS. Using the BIS, formal EPAS action proposals are then submitted to the Agency Advisory Bodies (ABs). Once discussed and agreed upon, the actions are then included in the next version of the EPAS. Prior to publication, the EPAS is approved by the EASA Management Board (MB).

Implementation and follow-up: The next step in the process involves the implementation and follow-up of the actions that have been included within the EPAS. There are different types of actions within the EPAS, e.g. research, rulemaking, Member State tasks, safety promotion and evaluation.

Safety performance measurement: The final stage in the process is then the measurement of safety performance. This serves to monitor:

(1) specific changes that have resulted from the implementation of safety actions; and
(2) the systemic changes that may have occurred in the aviation system and may require additional actions.

The measurement of the performance is done via a safety performance framework that monitors:

(1) transversally the various domains while looking at the key risk areas at domain level; and
(2) the specific safety issues.

The Annual Safety Review (ASR) is the annual review of the safety performance framework. It identifies safety trends, highlights priority domains, key risk areas and safety issues. From this step, the SRM process begins again.

Introducing the Safety Risk Portfolios

The EPAS Volume III provides the EASA Safety Risk Portfolios. In their most simplified versions, the Safety Risk Portfolios are a list of safety issues that need to be mitigated at European level.

Safety Risk Portfolios form an essential component of the European SRM process. In developing the portfolios, safety information is gathered and analysed from sources such as occurrence data, expert judgement, and safety studies. Our safety partners are essential to gathering this safety information.
Safety issues

Safety issues are identified through the Agency’s analysis of aviation occurrence data and other safety-related information (such as hazards) or submitted as a safety issue through the CAGs, NoAs, EASA’s website or internal EASA stakeholders. Safety issues identified through aviation data collected by the Agency are published in the EASA ASR Appendices in the form of a data portfolio. The Safety Risk Portfolio is an advanced and processed form of the data portfolio that has been augmented with additional layers of qualitative analysis and subject-matter expertise from the CAGs and the NoAs. The safety issues qualify to enter or exit the Safety Risk Portfolio according to the level of residual risk they bear. The residual risk considers the available mitigations introduced to control the safety issue (new or strengthened barriers, other solutions).

The safety issues and Safety Risk Portfolios are grouped by domain as each domain has its particularities and requires specific expertise. The following domains are part of the SRM process:

- Systemic and conjunctural
- Human factors/human performance
- Commercial air transport — aeroplanes
- Rotorcraft
- Non-commercial operations — small aeroplanes
- Sailplanes (New)
- Balloons (New)
- Airworthiness (New)
- Air traffic management/air navigation services (ATM/ANS)
- Aerodromes and ground handling

Although the analysis and portfolios are organised per domain, some safety issues are relevant to more than one domain. These safety issues have to be analysed from a multi-domain perspective. Within the Agency, we ensure that such issues are assessed in a cross-domain manner with one domain taking the lead. Thus, while the safety issue may appear in only one Safety Risk Portfolio, all relevant domains participate in the assessment of the safety issue to ensure the development of a holistic solution. In addition to such efforts, EASA coordinates a multi-domain perspective for such safety issues through the Safety in Aviation Forum for Europe, which is also known as SAFE 360°.

Introducing the key risk areas

Key risk areas are the determination of the most likely type of accident that an occurrence could have escalated to. They are another core concept in the European SRM process along with safety issues. The key risk areas provide insights to the most common potential accident outcome and the immediate precursors that may lead to the accident outcome. The set of key risk areas (Commission Delegated Regulation (EU) 2020/2034) provides a common taxonomy for the possible accident outcomes, based on which the safety risk management

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3 Safety issue: Safety issues are safety deficiencies related to one or more hazards. They are the actual manifestation of a hazard or combination of several hazards in a specific context. They can be risk assessed and practically managed (mitigated).

4 It is important to note that due to additional layers of qualitative assessment, the safety issues presented in the data portfolios may evolve in their scope. Thus, there might be slight differences in how the safety issues are presented in the data portfolio and Safety Risk Portfolio.

5 A domain is a container that is used to consistently and coherently group safety issues to manage them. It can be led by operational, organisational, consensual or conjunctural considerations.

is structured. Prioritisation applies to the safety issues being the safety deficiencies related to one or more hazards. In prioritising safety issues, key risk areas are considered when determining the worst likely accident outcome the safety issue may have escalated to, as part of the residual risk classification (refer to the description of ‘prioritisation’).

Each safety issue is therefore associated with one, or most of the time, several key risk areas. For example, the safety issue ‘Entry of aircraft performance data’ may have as an outcome (i.e. key risk area) ‘excursion’ or ‘aircraft upset’.

The 10 key risk areas are listed below, using the definitions as per the Delegated Act for the European risk classification scheme:

- **Airborne collision**: a collision between aircraft while both aircraft are airborne; or between aircraft and other airborne objects (excluding birds and wildlife).
- **Aircraft upset**: an undesired aircraft state characterised by unintentional divergences from parameters normally experienced during operations, which might ultimately lead to an uncontrolled impact with terrain.
- **Collision on runway**: a collision between an aircraft and another object (other aircraft, vehicles, etc.) or person that occurs on a runway of an aerodrome or other predesignated landing area. This does not include collisions with birds or wildlife.
- **Excursion**: an occurrence when an aircraft leaves the runway or movement area of an aerodrome or landing surface of any other predesignated landing area, without getting airborne. This includes high-impact vertical landings for rotorcraft/VTOL and balloons/airships.
- **Fire, smoke and pressurisation**: an occurrence involving cases of fire, smoke, fumes or pressurisation situations that may become incompatible with human life. This includes occurrences involving fire, smoke or fumes affecting any part of an aircraft, in flight or on the ground, which is not the result of impact or malicious acts.
- **Ground damage**: damage to aircraft induced by operation of aircraft on ground on any other ground area than a runway or predesignated landing area, as well as damage during maintenance.
- **Obstacle collision in flight**: collision between an airborne aircraft and obstacles raising from the surface of the earth. Obstacles include such things as tall buildings, trees, power cables, telegraph wires and antennae as well as tethered objects.
- **Terrain collision**: an occurrence where an airborne aircraft collides with terrain, without indication that the flight crew was unable to control the aircraft. This includes instances when the flight crew is affected by visual illusions or degraded visual environment.
- **Other injuries**: an occurrence where fatal or non-fatal injuries have been inflicted, which cannot be attributed to any other key risk area.
- **Security**: an act of unlawful interference against civil aviation. This includes all incidents and breaches related to surveillance and protection, access control, screening, implementation of security controls and any other acts intended to cause malicious or wanton destruction of aircraft and property, endangering or resulting in unlawful interference with civil aviation and its facilities. It includes both physical and cybersecurity events.

Links between safety issues and key risk areas they contribute to are depicted in Appendix A to this Volume.
1. INTRODUCTION

Safety issues affected by climate change

Managing the impact of climate change on aviation safety is one of the strategic goals for the Agency (please refer to Volume I of the EPAS). Climate change is likely to affect the frequency and the intensity of hazardous weather phenomena, but also where and at what time of the year such phenomena tend to occur.

Examples of hazardous weather phenomena are severe airborne icing, severe turbulence, low-level windshear, hail encounters, lightning strikes, etc. Although the effects of climate change on hazardous weather phenomena are rather long-term, they should be considered to ensure that safety risk assessments and risk mitigation measures are sustainable.

The Agency is currently gaining more knowledge on the effects of climate change on aviation safety, with the intent to inform safety issue assessments. To that end, this topic has been one of the core activities of the Agency’s Scientific Committee since it was launched in 2022, and it is tracked by a research action in Volume II of the EPAS. The first findings of the Scientific Committee regarding severe convective storms, hail and clear-air turbulence can be consulted in the Scientific Committee’s annual report 2022. The European_Academia@EASA conference in March 2023 covered, among others, how climate change affects aeroplanes take-off performance.

In addition, the Agency has decided to establish a work programme on climate change adaptation, and to launch a European network on the impact of climate change on aviation safety, with national competent authorities, aviation industry, weather and climate scientists. This network had its kick-off meeting in November 2023.

In the following section, provided that a weather hazard contributes to a safety issue and there are indications that climate change is likely to influence trends related to a particular weather hazard, the affected safety issue is tagged ‘(CC effect)’.

Safety issue prioritisation: Safety Issue Priority Index (SIPI)

Safety issue prioritisation is a structured approach allowing safety issues to be risk-classified in a consistent manner, regardless of the operational domains they belong to, and regardless of the source of the safety intelligence (safety data, experts’ inputs, etc.) through which they have been identified. Some safety issues are identified via occurrence data, others through accident and serious incident investigations, and still more through expert judgement and safety studies.

The approach creates an index that is built upon a residual risk evaluation of the safety issues. ‘Residual risk evaluation’ means that we consider the worst likely accident outcomes and the effectiveness of their implemented systemic barriers. In other words, a safety issue with the same potential outcome as another one but with additional effective mitigations in place will have a lower ‘residual risk’.

Other elements that are factored in the prioritisation index are:

- whether the safety issue has already resulted in fatalities, or contributed to a high-energy accident outcome; or
- whether the safety issue is novel, i.e. associated conditions are not fully understood or known, thus the risk may potentially be elevated (e.g. associated with newly introduced technology, unusual operations, innovative design); or
- whether the operational exposure to the safety issue is important (e.g. safety issue is affecting all flights of the domain, or safety issue may only be of concern during training flights, reducing the operational exposure).

Any positive replies to the above questions will imply a higher-priority index.

7 Refer to EASA’s Scientific Committee (SciComm) | EASA (europa.eu)
8 Refer to European_Academia@EASA conference 2023 - Physical | EASA (europa.eu)
The resulting index enables a prioritisation of the safety issues for further assessment (refer to SRM process step 2) and support the Agency and its safety partners in deciding what safety assessments are to be launched in priority. The index is reviewed on a regular basis for all safety issues to reflect changes in the elements that were factored in. It is an iterative and continual approach towards prioritisation of safety issues.

As a practical way to support the prioritisation per domain, the safety issues are then split into two categories, an ‘elevated’ one and a ‘normal-to-low’ one. The eventual intention is to focus the collaborative resources first on safety issues within the elevated category. Indeed, based on the priority index construction, the ‘elevated’ category will include safety issues such as novel ones and/or safety issues for which undesired outcomes have already realised and where the effectiveness of the current systemic barriers is not satisfactory and for those where a significant part of the flights are affected.

**Higher-risk safety issues in the EU aviation system**

As the SIPI method is applied in a systemic and consistent manner for each of the safety issues from all domains, it also provides a cross-domain perspective of the higher-risk safety issues in the EU aviation system, irrespective of the SRM step they are currently in. Currently, there are 20 higher-risk cross-domain safety issues listed in alphabetical order:

<table>
<thead>
<tr>
<th>ID</th>
<th>Domain</th>
<th>Title</th>
<th>Category/status</th>
</tr>
</thead>
<tbody>
<tr>
<td>SI-2014</td>
<td>ATM/ANS</td>
<td>Airborne Collision with Unmanned Aircraft System (UAS)</td>
<td>ASSESS/QUEUED</td>
</tr>
<tr>
<td>SI-4010</td>
<td>NCO A</td>
<td>Airborne separation</td>
<td>MITIGATE/IMPLEMENT</td>
</tr>
<tr>
<td>SI-5515</td>
<td>SYS&amp;CONJ</td>
<td>Airspace infringements by military UAS, aircraft, missiles, or debris spilling over from conflict zones</td>
<td>MONITOR</td>
</tr>
<tr>
<td>SI-0007</td>
<td>CAT A</td>
<td>Approach path management</td>
<td>MITIGATE/DEFINE</td>
</tr>
<tr>
<td>SI-0039</td>
<td>CAT A</td>
<td>Fatigue (FTL)</td>
<td>ASSESS/QUEUED</td>
</tr>
<tr>
<td>SI-1019</td>
<td>ADR/GH</td>
<td>Ground staff movement around aircraft</td>
<td>ASSESS/ACTIVE</td>
</tr>
<tr>
<td>SI-9006</td>
<td>Airworthiness</td>
<td>Inadequate aircraft system design resulting in maintenance errors</td>
<td>ASSESS/QUEUED</td>
</tr>
<tr>
<td>SI-8031</td>
<td>Rotorcraft</td>
<td>Inadequate obstacle clearance during any flight phase</td>
<td>ASSESS/ACTIVE</td>
</tr>
<tr>
<td>SI-0010</td>
<td>CAT A</td>
<td>Inappropriate Flight Control Inputs</td>
<td>ASSESS/ACTIVE</td>
</tr>
<tr>
<td>SI-9002</td>
<td>Airworthiness</td>
<td>Insufficient consideration of flight crew human factors in Functional Hazard Assessments</td>
<td>MONITOR</td>
</tr>
<tr>
<td>SI-9003</td>
<td>Airworthiness</td>
<td>Insufficient consideration of flight crew human factors in the continued airworthiness process of the type design</td>
<td>ASSESS/ACTIVE</td>
</tr>
<tr>
<td>SI-0009</td>
<td>CAT A</td>
<td>Insufficient Crew Resource Management (CRM)</td>
<td>ASSESS/QUEUED</td>
</tr>
<tr>
<td>SI-3016</td>
<td>HF/HP</td>
<td>Lack of focus on risk-based decision making in complex systems</td>
<td>ASSESS/QUEUED</td>
</tr>
<tr>
<td>SI-9005</td>
<td>Airworthiness</td>
<td>Outdated certification bases established for major changes to type certificates</td>
<td>ASSESS/QUEUED</td>
</tr>
<tr>
<td>SI-1010</td>
<td>ADR/GH</td>
<td>Poor coordination and control of turnarounds</td>
<td>ASSESS/ACTIVE</td>
</tr>
<tr>
<td>SI-4007/ SI-8017</td>
<td>NCO A/Rotorcraft</td>
<td>Poor pre-flight planning and preparation</td>
<td>ASSESS/QUEUED</td>
</tr>
<tr>
<td>SI-4023</td>
<td>NCO A</td>
<td>Risks associated with parachute operations</td>
<td>MITIGATE/DEFINE</td>
</tr>
<tr>
<td>SI-0005</td>
<td>HF/HP</td>
<td>State of Wellbeing and Fit for Duties</td>
<td>MONITOR/PASSIVE</td>
</tr>
<tr>
<td>SI-8024</td>
<td>Rotorcraft</td>
<td>Unanticipated yaw / Loss of tail rotor effectiveness</td>
<td>ASSESS/QUEUED</td>
</tr>
<tr>
<td>SI-2006</td>
<td>ATM/ANS</td>
<td>Undetected occupied runway</td>
<td>ASSESS/QUEUED</td>
</tr>
</tbody>
</table>

**Table 1:** 20 higher-risk cross-domain safety issues listed in alphabetical order
**Process to handle safety issues in the SRM**

Each safety issue is assigned an identification number (SI-DNNN) to facilitate tracking within the SRM process, as well as its relevance to different aviation domains. The safety issues are then categorised in the Safety Risk Portfolios as follows:

- **Assess – Elevated priority index**
  - Facilitates Step 2: Assessment of safety issue
  - Safety issues for which further assessment is or will be launched in higher priority to propose mitigation actions as needed.

- **Assess – Normal-to-low priority index**
  - Facilitates Step 2: Assessment of safety issue
  - Safety issues for which further assessment should be launched, when resources allow, to propose mitigation actions as needed.

- **Mitigate – define**
  - Facilitates Step 3: Definition and programming of safety actions
  - Safety issues with proposed mitigation actions under validation.

- **Mitigate – implement**
  - Facilitates Step 4: Implementation and follow-up of safety actions
  - Safety issues with validated mitigation actions ready for implementation, e.g. in the EPAS

- **Monitor**
  - Facilitates Step 5: Safety performance measurement
  - Monitoring the rate of occurrences linked to a safety issue or, more specifically, the effectiveness of the mitigations implemented for a given safety issue

**Figure 1-2: Categories of safety issues**

The mitigating action for some safety issues in the ‘mitigate’ or ‘monitor’ could be a safety promotion item; more information is available on the [EASA Together4Safety Community Websites](https://www.easa.europa.eu).  

**How safety issues are removed within SRM:**

Safety issues are removed from the relevant Safety Risk Portfolio following an assessment concluding that:

- they are no longer relevant in the current operational context (this may concern in particular conjunctural safety issues), or
- they are not sufficiently specified or require a better scoping.

Any decision to temporarily or permanently remove a safety issue from a Safety Risk Portfolio is validated and documented as part of the relevant EU SRM process steps.

Safety issues will exit a domain Safety Risk Portfolio where the risk assessment concludes that they are sufficiently mitigated and that the residual risk is acceptable, without the need for further action or monitoring.
Main changes since the last edition

- 35 new safety issues were added, 60 safety issues amended, 8 safety issues transferred, and 19 safety issues removed.
- Three new chapters were added: Airworthiness, Balloons, and Sailplanes.
- The cross-domain higher-risk safety issues list is updated.
- Reasoning on why a safety issue is tagged with CC – Climate Change effect at "Effects of climate change under scrutiny" is added.
- New Safety Risk Portfolios and new safety issues marked ‘(New)’. Safety issues for which definitions and/or the title were updated are marked ‘(Amended)’. Transferred safety issues to a portfolio from another portfolio are marked ‘(Transferred)’ at the Safety Risk Portfolio which the given safety issue was transferred to.
2. Systemic and conjunctural — SYS & CONJ

The Systemic and conjunctural Safety Risk Portfolio is designed to manage the safety issues at a systemic level affecting several domains, or stemming from or being associated with crises.

The traffic levels in 2023 are close to the ones of 2019. That means that the impacts of the COVID-19 pandemic can be seen as being over; however, some still have a long-lasting effect, that is experienced as safety issues or factors exacerbating safety issues, such as reduced adherence to procedures, increased presence of wildlife in aerodromes, cyber-attacks, shortage of operational and technical staff, and possible traffic disruptions. The effects of the war in Ukraine and energy crises are still present and affect the civil aviation sector, namely GNSS manipulation, airspace infringements by military unmanned aircraft systems (UAS), aircraft or debris spilling over from conflict zones, and others.

In spring 2023, in collaboration with its safety partners, the Agency took the initiative to apply the SRM process to identify and manage safety risks associated with the potential safety issues stemming from or leading to possible traffic disruptions over the summer. To raise awareness and recommend mitigations, EASA issued safety information bulletin SIB 2023-05 ‘Possible Risks Emerging During Summer 2023’ on 6 June.

It is important to note that some safety issues, such as ‘Reduced available financial resources’, cannot be directly addressed by the Agency or the EASA Member States but are important for organisations to include in their safety management systems. In addition, not all safety issues may be applicable in the future due to the fluidity of the circumstances. Some safety issues have been removed from this year’s portfolio as being not current anymore.

The safety issues in the portfolio are sorted into the ‘Assess – Elevated priority index’, ‘Assess – Normal-to-low priority index’, ‘Mitigate – define’, ‘Mitigate – implement’, and ‘Monitor’ categories, which provide a snapshot of their status within the European SRM process by priority. The safety issue prioritisation method is described in the Introduction of this Volume. To understand each safety issue better, please click on the safety issue in the list to access their description.

Currently there are 30 safety issues in the SYS & CONJ Safety Risk Portfolio. Since the last edition, 9 new safety issues were added and 11 amended. The new safety issues are capturing problems such as aircraft collisions with space debris, space weather effects on aviation, issues associated with the war in Ukraine, staff resource planning, missed knowledge transfer. They were identified from various sources as per the EU SRM process, discussed in the Agency’s CAGs and reviewed by the Agency itself. 7 safety issues were removed from the portfolio as non-current anymore, mostly the ones related to the COVID-19 pandemic situation. One safety issue, SI-5017A ‘Airline systems vulnerability leading to disruptions due to cyber attacks’ (SI-5017A) was transferred to the CAT aeroplanes Safety Risk Portfolio and another one, SI-5031 ‘Ground handling training programmes disruption’ (SI-5031) to the Aerodromes and ground handling Safety Risk Portfolio.

The highest SIPI score safety issues in the portfolio are ‘Errors of civil aircraft identification by ground military forces and airborne assets outside the conflict zone’, ‘Reduced adherence to procedure’s, and ‘Increased Presence of Wildlife on Aerodromes’.

Refer to Appendix A for the link between safety issues and key risk areas.

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9 A critical set of circumstances; a crisis.
## 2. Systemic and Conjunctural — Sys & Conj

### List 2-1: Systemic and conjunctural safety issues per category & priority

<table>
<thead>
<tr>
<th>Assess – Elevated priority index</th>
<th>Facilitates Step 2: Assessment of safety issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>NIL</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess – Normal-to-low priority index</th>
<th>Facilitates Step 2: Assessment of safety issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>NIL</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mitigate – define</th>
<th>Facilitates Step 3: Definition and programming of safety actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>NIL</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Mitigate – implement</th>
<th>Facilitates Step 4: Implementation and follow-up of safety actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Reduced adherence to procedures (SI-5014)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Monitor</th>
<th>Facilitates Step 5: Safety performance measurement</th>
</tr>
</thead>
<tbody>
<tr>
<td>NIL</td>
<td></td>
</tr>
</tbody>
</table>

- Errors of civil aircraft identification by ground military forces and airborne assets outside the conflict zone (SI-5530) (New)
- Increased Presence of Wildlife on Aerodromes (SI-5010)
- Airspace infringements by military UAS, aircraft, or debris spilling over from conflict zones (SI-5515) (Amended)
- GNSS signal manipulation leading to navigation or surveillance degradation (SI-5501A) (Amended)
- Shortage of operational and technical staff (SI-5018) (Amended)
- Non-standard and unplanned military activities outside the conflict zones (SI-5508)
- Reduced Available Financial Resources (SI-5019)
- Unrealistic staff resource planning causing flight delays or cancellations (SI-5034) (New)
- Separation with unidentified aircraft (SI-5514)
- Missing suppliers and low availability of parts (SI-5020) (Amended)
- Aviation personnel fatigue (SI-5002) (Amended)
- Cyber attacks (SI-5017)
- Short time available for training affecting training effectiveness (SI-5032) (New)
- Knowledge transfer issue for new generation Aviation personnel (SI-5033) (New)
- Flight route congestion (hotspots) (SI-5506)
- Transition of a civilian airport to mixed civil-military operations (SI-5533) (New)
- Continued airworthiness related issues due to sanctions (SI-5502) (Amended)
- Non-standard operational air traffic routings, reservation of military areas outside the conflict zone (SI-5532) (New)
- Coping with rapid evolution of Air Traffic recovery (SI-5030) (Amended)
- Reduced focus on, or prioritisation of safety (SI-5009)
- Aircraft vulnerability leading to flight safety degradation due to cyber attacks (SI-5017B)
- Reduced oversight by competent authorities (SI-5001) (Amended)
- Spare parts shortages (other than aircraft) (SI-5504) (Amended)
- Reduction in training effectiveness due to remote training (SI-5023) (Amended)
- Skills and knowledge degradation due to lack of recent practice (SI-5003)
2. SYSTEMIC AND CONJUNCTURAL — SYS & CONJ

- Space weather effects on aviation (SI-5102) (New)
- Aircraft collision with space debris (SI-5101) (New)
- The scale of aircraft storage and subsequent destorage may lead to technical failures (SI-5011) (Amended)
- Effects of space radiation on aircrews (SI-5103) (New)

Aircraft collision with space debris (SI-5101) (New)

Some re-entries of rocket bodies have already caused a certain level of disruption in the European airspace. The disruption was caused by the closure of airspace by several national authorities. The non-harmonised response in the affected area further increased the disruption and potentially increased the safety risk for flights in the region (e.g., holding aircraft under the trajectory of the rocket debris).

It is understood that there will be an increase in numbers of re-entry events due to increased space activity (increase in number of rocket launches, satellites, increased probability of airborne collision with debris).

Related SIBs:
- SIBs issued for known re-entry events.

Aircraft vulnerability leading to flight safety degradation due to cyberattacks (SI-5017B)

Aircraft systems may be vulnerable to hacking, or ground support systems leading to faulty maintenance, airline systems causing major disruptions to the air traffic system.

Airspace infringements by military UAS, aircraft, or debris spilling over from conflict zones (SI-5515) (Amended)

Airspace infringement by military UAS, or aircraft spilling over from conflict zones into the controlled airspace without coordination/permission, debris of shot missiles, could lead to loss of separation. Presence of military UAS unexpectedly within civilian air traffic areas may disrupt normal operations. There is the potential for misuse of civilian UAS as obstacles, to attack critical sites or to disrupt normal air traffic flows.

Aviation personnel fatigue (SI-5002) (Amended)

The increase of activity in combination with possible traffic disruptions may give rise to aviation personnel fatigue. The consequence of fatigued personnel (impaired person’s alertness and ability to perform safety-related operational duties) in the workplace is the increased likelihood of human error, lower readiness to recognise that error or a problem, and timely and appropriately react to them.

Organisations should pay close attention to the fact that Commander’s discretion measures are not used as a standard resource planning tool. Organisations should closely monitor fatigue reporting and actively support reporting of fatigue and other occurrences via a strong just culture.

Guidance on how to address this issue is available at: https://www.easa.europa.eu/community/topics/fatigue-management

Related SIBs:
- EASA SIB 2023-05: Possible Risks Emerging During Summer 2023

Continued airworthiness related issues due to sanctions (SI-5502) (Amended)

Due to sanctions, aircraft manufacturers are unable to technically support their fleets in Russia, which will have an impact on the safety standards of the affected aircraft. This includes maintenance support, customer service, technical assistance, and parts. Type-certificate holders will not receive information from Russian air operators
regarding failures, malfunctions, defects, or other occurrences which cause or might cause adverse effects on the continued airworthiness of aircraft type designs.

**Coping with rapid evolution of Air Traffic recovery (SI-5030) (Amended)**

The scale of the increase in air traffic levels has made and may make the evolution of air traffic difficult to predict, creating a mismatch in terms of ATM/ANS capacity. Member States’ differing pace of recovery in terms of available capacity and air traffic demand may exacerbate the problem.

**Cyber attacks (SI-5017)**

Increase in cyberattacks, associated with the war in Ukraine.

Proposed actions to mitigate this safety issue:

- Perform security risk assessments
- Identify severe threats
- Raise staff and user awareness of cybercrimes
- Constantly train IT and security staff
- Protect sensitive data
- Use multi-factor authentication
- Ensure strong security policy
- Conduct regular unannounced audits
- Advise crew to avoid carrying substantial amounts of company data (laptops or removable storage devices)

**Effects of space radiation on aircrews (SI-5103) (New)**

Solar radiation storms, occurring under particular circumstances, cause an increase in radiation dose to flight crews and passengers. As high polar latitudes and high altitudes have the least shielding from the particles, the threat is the greatest for executive jet and higher altitude commercial polar flights. Operators are already required to monitor the occupational exposure of aircrew to cosmic radiation (refer to Council Directive 2013/59/Euratom on ionising radiation).

**Errors of civil aircraft identification by ground military forces and airborne assets outside the conflict zone (SI-5530) (New)**

As shown by previous wars, misidentification is easy in the confused arenas of warfare. Blue on blue incidents have been numerous in the past. It’s not only from one side that the risk develops. If the likelihood of the jamming of electronic aids that may be involved with navigation and/or aircraft identification tools is added, there is a potential risk for civil aircraft becoming subject to missiles or radar laid weapons.

Guidance on how to address this issue is available at:

- EASA CZIBs and relevant NOTAMs

**Flight route congestion (hotspots) (SI-5506)**

The reduction of available airspace (due to military activity and airspace closure) creates a corresponding increase in traffic in the remaining available airspace. This may lead to flight route congestion or high traffic on certain routes, with consequences such as: increased ATCO/flight crew workload, more frequent turbulence and wake turbulence, phraseology issues, risk of injury to passengers and aircrew during avoidance manoeuvres, and increased risk of mid-air collision (MAC).
**GNSS signal manipulation leading to navigation or surveillance degradation (SI-5501A) (Amended)**

Due to military electronic warfare system usage, GNSS signals may be disturbed or altered in countries adjacent to conflict zones, affecting the operation of aircraft en route and/or operating at aerodromes. GNSS signal interference may be only temporary, and pilots should not only be aware of the risk but also ensure that procedures in case of GNSS signal loss are included in the flight planning. This safety issue is linked with **SI-0034 Over-reliance on satellite navigation.**

Related SIBs:

**Increased presence of wildlife on aerodromes (SI-5010)**

The reduced traffic at aerodromes has increased the presence of wildlife habitation at aerodromes. This carries the risk not only of birds and insects nesting in stored aircraft and equipment, but also bird strikes to aircraft once airborne.

Guidance on how to address this issue is available at:

And related SIBs:
- EASA_SIB_2020-07R2 on Progressive Restart of Aerodrome Operations after Complete or Partial Closure addresses wildlife hazard management

**Knowledge transfer issue for new generation Aviation personnel (SI-5033) (New)**

Many highly knowledgeable people have retired from the industry or changed over to another industry during the pandemic, with little opportunity to provide detailed and gradual handovers to colleagues. As a result, organisations and the industry has lost the experience and tacit knowledge from a generation that in many cases founded the industry we work in and developed the procedures, principles, and regulations that we now take for granted.

Related SIBs:
- EASA SIB 2023-05: Possible Risks Emerging During Summer 2023

**Missing suppliers and low availability of parts (SI-5020) (Amended)**

The lockdown had resulted in difficulties for organisations liaising with their suppliers. Further economic strains have increased problems with maintaining or recovering the supply chains, and or leading to a lack of spare parts, products, calibrated tooling and others. This may affect the availability of aircraft.

Related SIBs:
- EASA SIB 2023-05: Possible Risks Emerging During Summer 2023

**Non-standard and unplanned military activities outside the conflict zones (SI-5508)**

This safety issue relates to non-standard military activities, such as increased activity of unmanned aircraft patrolling, or surveillance conducted outside conflict zones. The response to the Ukraine war may result in Member States experiencing an increase in unplanned military exercises, as well as movement of military aircraft from certain airbases to others. Unexpected ‘due regard’ flights could also pose an increased risk for commercial air operations in certain areas. Traffic types that are unusual in certain areas (e.g. formation flights, in-flight refuelling of aircraft, etc.) may increase. Overall, this can lead to an increase in ATCO workload created by the need for increased coordination/communication. It will affect the airspace capacity and increase the risk of airborne collision of civil traffic with military manned and unmanned aircraft.
Non-standard operational air traffic routings, reservation of military areas outside the conflict zone (SI-5532) (New)

Ad hoc requests to establish temporary segregated areas (transit corridors) and ad hoc reservation of military areas outside of operational hours published in AIPs, may lead to extra workload as they must be coordinated with all parties involved.

Reduced adherence to procedures (SI-5014)

During previous, low-activity periods, low workload levels may have created a sense of a less risky operating environment, causing staff to become complacent, not completely following procedures, and/or being less alert. In the context of increasing levels of operations, organisations should consider these aspects.

Guidance on how to address this problem is available at:
Safety Promotion campaign: [https://www.easa.europa.eu/community/content/ramp-be-ready-stay-safe](https://www.easa.europa.eu/community/content/ramp-be-ready-stay-safe)

Reduced available financial resources (SI-5019)

A reduction in available financial resources may cause the loss of key personnel and corporate knowledge, increased pressure on personnel, and affect decision-making. Long-term investment plans may slip or be changed, with consequences long after traffic levels have begun to recover.

Reduced focus on, or prioritisation of safety (SI-5009)

There are multiple factors that mean that organisations may not be providing safety and safety management with the same level of attention and resources as normal. These include distractions and stress at a personal level, and economic pressures, loss of staff and the practical pressures of returning to service at an organisational level.

Guidance on how to address this problem is available at:

Reduced oversight by competent authorities (SI-5001) (Amended)

Competent authority staff are less available and that affects on-site visits. This means that oversight may not be in depth and in many cases the time periods between checks have increased. Guidance has been provided to the Member State competent authorities on how to effectively mitigate this risk.

Reduction in training effectiveness due to remote training (SI-5023) (Amended)

Necessary adaptations to training to prevent the spread of COVID introduced broader use of remote training. Remote training is still widely used after the pandemic and has many benefits; however, that may also reduce the effectiveness of certain training. Examples include crew resource management (CRM) training if fully performed remotely, or cabin crew training using safety equipment and performing cardiopulmonary resuscitation (CPR).

Separation with unidentified aircraft (SI-5514)

This safety issue addresses the increased presence of unresponsive and/or unidentified traffic. As an example, between the Finnish and the Estonian territorial waters, there is a narrow corridor of neutral waters providing Russia with access to the Baltic Sea and Kaliningrad. Russian flights may or may not have a transponder on/flight plan, they may or may not be in radio contact, and they use any level that suits their purpose. Such traffic conflicts with the Helsinki inbound–outbound civil traffic or is a completely new category of en-route traffic operating under normal air navigation service (ANS) rules and regulations but within the limitations set for Russian operators concerning the Finnish and the Estonian airspace. The number of flights over neutral waters has drastically increased, increasing in turn the ANS workload and imposing an effect on the flight profiles of civil aircraft.
Shortage of operational and technical staff (SI-5018) (Amended)

Organisations’ limited finances may have limited the number of personnel they employed, and movement restrictions due to the pandemic may have further hampered personnel in remaining in the workplace. Staffing shortages at aerodromes, caused by difficulty in recruiting and retaining ground handlers and significantly exacerbated by the unexpectedly strong recovery of European airline operations may lead to increased human error due to high staff workload/time pressure and unofficial adaptations to streamline tasks, increased time in security checks (passengers and crew) causing delays and constraining pre-flight activities, reduced capacity in supplying ground service equipment to aeroplanes at the stand, and delays causing changes to planned operations. This safety issue also includes shortage of dispatchers, staffing maintenance staff, air traffic services and flight/cabin crews.

Related SIBs:
- EASA SIB 2022-06: Risks Emerging During Ramp-up of Aviation Activities
- EASA SIB 2023-05: Possible Risks Emerging During Summer 2023

Short time available for training affecting training effectiveness (SI-5032) (New)

Turnover of operational staff, and required staffing due to increased traffic makes the time available for training short. That may lead in reduced availability of the operational staff or reduced competence. The issue may become a limiting factor on capacity during increased volume of operations or will cause fatigue or overload where there is a reduced number of personnel providing services.

Related SIBs:
- EASA SIB 2023-05: Possible Risks Emerging During Summer 2023

Skills and knowledge degradation due to lack of recent practice (SI-5003)

This safety issue concerns the degradation of skills and knowledge of aviation professionals across the different aviation domains due to the lack of recent practice largely attributed to the sharp decrease in traffic due to the COVID-19 pandemic and exacerbated by the war in Ukraine. Some aviation organisations may again resort to furloughing their staff due to less competitive flights (increased fuel prices in combination with longer routes). While this situation impacts on all aviation professionals, including those for whom aviation is a leisure activity (e.g. general aviation pilots), this safety issue primarily focuses on aviation professionals such as air traffic controllers (ATCOs), commercial flight crew, aerodrome operations staff, ground handling staff, and maintenance engineers.

Guidance on how to address this issue is available at:
https://www.easa.europa.eu/community/topics/skills-and-knowledge-degradation

Space weather effects on aviation (SI-5102) (New)

The solar activity follows an 11-year cycle. The last peak was in April 2014 and the next one is forecasted for 2025 (as published on 15 September 2020 on https://www.weather.gov/news/201509-solar-cycle; also refer to paragraph on solar radiation timeline in SIB 2012-09R1). However, there are sources mentioning that the cycle has started earlier, already in 2019. The following risk considerations are relevant:
- An increased reliance on GNSS as the main source for navigation and time.
- In a similar manner, an increased reliance on satellite-based communications.
- The use of polar routes for aircraft trajectory is increasing as it provides reduction in travel times or evasion of conflict zones. Especially on such routes, airlines also need to consider the effects of solar activity on HF communication: poorer quality, a shift to lower usable frequency bands, and more noise or fading. During extreme solar activity, HF communications may not be available in the polar region.
• The availability, continuity, integrity and accuracy of un-augmented GNSS in the region close to the magnetic equator can rapidly change in time during the event. The most intense scintillation is around the magnetic equator.

Related SIBs:
• EASA SIB 2012-09R1 Effects of Space Weather on Aviation
• EASA SIB 2012-10R1 Single Event Effects on Aircraft Systems caused by Atmospheric Radiation

Spare parts shortages (other than aircraft) (SI-5504) (Amended)
The current crisis may lead to an increase in the prices of spare parts (other than aircraft, ATM/ANS equipment, aerodromes, ground handling, etc.) and shortages in the availability of electronic equipment, especially if components are manufactured in countries which are directly affected by the crisis or are geopolitically aligned with Russia, and this may have a negative effect on aviation safety.

Related SIBs:
• EASA SIB 2023-05: Possible Risks Emerging During Summer 2023

The scale of aircraft storage and subsequent destorage may lead to technical failures (SI-5011) (Amended)
The number and rate of aircraft entering the service has been very high. Storage has been for a longer period than anticipated and aircraft may exit storage at short notice. Examples of associated hazards are aircraft that have not been adequately protected by covers, blockage of air data systems, fuel contamination, wildlife ingress, and a lack of maintenance (delayed maintenance tasks). Sufficient time and personnel will need to be available to return these aircraft to service.

Guidance on how to address this issue is available at:
• https://www.easa.europa.eu/community/topics/destorage-aircraft

And related SIBs:
• EASA SIB 2020-14R1 Contamination of Air Data Systems During Aircraft Parking and/or Storage due to the COVID-19 Pandemic
• EASA SIB 2020-18 Nickel-Cadmium Batteries - Risk of Capacity Reduction during Aircraft Parking and Storage
• EASA SIB 2020-06 Use of DuPont Kathon FP 1.5 Biocide
• EASA SIB 2020-05 on Aircraft Maintenance Programme under Part-ML

Transition of a civilian airport to mixed civil-military operations (SI-5533) (New)
In the event of an increase in the number of air operations with military status related to military operations and securing NATO’s eastern flank using civil air traffic services, there may be increased risks stemming from mixed civil-military operations at airports, especially during the transition period. When introducing subsequent alert levels and preparing the airport infrastructure for military purposes (temporary logistic bases, field hospitals, fuel bases, etc.), the airport operational procedures may not be fit for the new purpose and can create organisational and operational disruptions to the airport’s services. The emerging facilities may pose a potential threat to air operations.

Unrealistic staff resource planning causing flight delays or cancellations (SI-5034) (New)
Due to commercial pressure in the increase of activity after the pandemic period, the staff resource planning may become unrealistic in the drive of trying to sell maximum number of flights, leaving limited or no margin of staff available to operate these flights. Also, the planning may be too aggressive and not consider the real capacities of the partner organisations, namely of ground handling, security services at aerodromes, etc. This may lead to
delays, causing fatigue, and other disruptions. While pilots are trained to be able to adapt their plans, it subtly increases the risk of errors due to expectation bias, raises workload and therefore marginally increases the risk associated with the flight. At a macro level, this raises the risk of more serious errors occurring, leading to flight safety issues. Organisations are invited to apply a conservative and realistic approach in activity planning to avert these issues at a later stage.

Related SIBs:

- [EASA SIB 2023-05 Possible Risks Emerging During Summer 2023](#)
3. Human factors/human performance — HF/HP

The Human factors (HF)/human performance (HP) Safety Risk Portfolio developed in 2017 by the Agency, in conjunction with the HF CAG, has since been reviewed regularly. Due to the broad nature of HF/HP safety issues, they contribute to most, if not all key risk areas.

The safety issues in the portfolio are sorted into the ‘Assess – Elevated priority index’, ‘Assess - Normal-to-low priority index’, ‘Mitigate – define’, ‘Mitigate – implement’, and ‘Monitor’ categories, which provide a snapshot of their status within the European SRM process by priority. The safety issue prioritisation method is described in the Introduction of this Volume. To understand each safety issue better, please click on the safety issue in the list to access their description.

Since the last edition four (4) existing safety issues have been amended, and their corresponding factsheets amended. The revised versions of the four safety issues are capturing problems in a more refined manner, such as SI-3016 ‘Lack of focus on risk-based decision-making in complex systems’, SI-3015 ‘Impact of degraded levels of attention or vigilance on HP’, etc. They were identified from various sources as per the EU SRM process, discussed in the Agency’s CAGs and reviewed by the Agency itself.

In addition, the first edition of the Airworthiness Safety Risk Portfolio has been published this year. Two safety issues previously in the HP/HF domain were identified as suitable for transfer to the airworthiness one: SI-3017 ‘Error-mitigation by design (maintenance and production)’ (ref. SI-9006) and SI-3023 ‘Alignment between OSD and equivalent processes at other authorities’. Although SI-3023 was deemed eligible for transfer to the airworthiness domain, it was eventually not included in the portfolio, as the Airworthiness Safety Risk Portfolio is not meant to address dis-harmonisation of the FAA and EASA regulations unless having resulted in occurrences. SI-3024 ‘State of well-being and fit for duties’ (previously SI-0005) has been identified as an HF/HP issue and transferred in from the CAT-A safety domain.

The highest-priority safety issues in the portfolio are SI-3016 ‘Lack of focus on risk-based decision-making in complex systems’ (previously ‘Decision-making in complex systems’) and SI-3024 (previously SI-0005) ‘State of well-being and fit for duties’ that was transferred from the CAT Aeroplanes Safety Risk Portfolio.

The safety issue assessments were completed for safety issues SI-3011 ‘Training effectiveness and competence’; and SI-3005 ‘Fatigue and quality sleep’. They are now in the BIS stage of impact assessment.

List 3-1: Human factors/human performance safety issues per category & priority

<table>
<thead>
<tr>
<th>Assess – Elevated priority index</th>
<th>Facilitates Step 2: Assessment of safety issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Lack of focus on risk-based decision-making in complex systems (SI-3016) (Amended)</td>
<td></td>
</tr>
<tr>
<td>• State of wellbeing and fit for duties (SI-3024 previously SI-0005) (Transferred)</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess – Normal-to-low priority index</th>
<th>Facilitates Step 2: Assessment of safety issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Heavy workload and misaligned tasks (SI-3006)</td>
<td></td>
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<tr>
<td>• Lack of industry-wide staff support programmes (SI-3012)</td>
<td></td>
</tr>
<tr>
<td>• Impact of degraded levels of attention or vigilance on human performance (SI-3015) (Amended)</td>
<td></td>
</tr>
</tbody>
</table>
• Senior management competence and commitment to HF/HP principles (SI-3001).
• Impact of startle and surprise on flight crew management of safety-critical situations (SI-3010) (Amended)
• Knowledge development and sharing (SI-3008)
• Lack of evaluation of adverse impact of culture on human performance (SI-3002) (Amended)
• Degradation of resilient performance of an organisation and/or individual (SI-3009).
• Inadequate HF activities/HF specialist involvement and the effect on safety, efficiency, effectiveness and project timeline (SI-3014).
• Integration of HF/HP principles into the organisations management system (SI-3004).
• Limitations to root cause analysis (SI-3018).

Mitigate – define

Facilitates Step 3: Definition and programming of safety actions

• Training effectiveness and competence (SI-3011)
• Fatigue and quality sleep (SI-3005)

Mitigate – implement

Facilitates Step 4: Implementation and follow-up of safety actions

• Human factors competence for regulatory staff (SI-3003)
• Design and use of procedures (SI-3007)

Monitor

Facilitates Step 5: Safety performance measurement

• Human factors of multiple remote towers (SI-3022)

Degradation of resilient performance of an organisation and/or individual (SI-3009)

Organisational resilience is a key factor in successfully and safely managing operations, but there is scant regulatory guidance on how to apply the concept. Resilience comprises both a system’s ability to withstand disturbance, challenges and change, and to recover and sustain operations following disturbance, challenges and change. The positive contribution to safety of every single staff member is the key component of an organisation’s resilience.

Design and use of procedures (SI-3007)

Procedures are used throughout the aviation industry to describe the correct actions and sequence of actions to perform a task. Due to necessity, procedures are designed using assumptions about the circumstances in which they will be applied. While this frequently produces well-designed procedures, the complex nature of the aviation working environment means that not every circumstance can reasonably be accounted for. Regardless of whether the procedure has been designed well or badly, rapid changes in the aviation system can mean that a procedure becomes more difficult to use over time.

Fatigue and quality sleep (SI-3005)

Fatigue is repeatedly identified as one of the most serious challenges within the aviation industry. The signs of fatigue are subtle and will lower HP in all the known areas of human limitations. Preventing fatigue is dependent on obtaining both a sufficient quantity and quality of sleep. SI-3005 strives to ensure that adequate prevention against effects of fatigue is provided in all aviation domains.
Heavy workload and misaligned tasks (SI-3006)
The workload issue remains at the top of aviation discussions. It can be considered as consisting of two major components: physical workload and cognitive workload. High physical and mental workload situations often coincide, causing a significant degradation to cognitive capacity and consequently to one’s ability to execute a task correctly. In addition, task elements not aligned with staff competence will create additional error-prone conditions.

HF of Multiple Remote Towers (SI-3022)
Remote tower operations are increasingly being used as a means of effectively and efficiently providing ATS at an aerodrome. Multiple remote tower operations are also now being introduced, and the HF associated with this type of work needs thorough consideration.

Human factors competence for regulatory staff (SI-3003)
Competence is a set of observable and measurable behaviours that an individual is expected to demonstrate in relation to required task performance. It is important for regulatory staff to have specific HF competence to be able to perform their duties. This also provides an added benefit of improving the conversation on safety and HF between regulatory staff and people at different levels in industry.

Impact of degraded levels of attention or vigilance on human performance (SI-3015) (Amended)
Maintaining appropriate levels of attention and vigilance supports situational awareness. It is important to ensure that the working environment, equipment, and processes support the operator in performing the task, and do not introduce additional and unnecessary challenges to attention and vigilance required for safe operations. Typical descriptions of occurrences include becoming preoccupied with an unusual task rather than managing the more immediate situation; missing a step in a process where the process has become repetitive; lack of monitoring and cross check leading to undetected data entry errors.

Impact of startle and surprise on flight crew management of safety-critical situations (SI-3010) (Amended)
Surprise and its consequent reaction, startle, is a significant impediment to managing safety-critical situations but not enough is known about how to mitigate it. Research shows that cognitive impairment, particularly in the working memory, can be significant. During an unexpected critical event in aviation, such impairment could be critical to the effective recovery from the situation. Narrowed attention, decreased search behaviour, longer reaction time to peripheral cues, decreased vigilance, degraded problem-solving, performance rigidity, degraded working memory function and critical effects on psychomotor skills are just some of the impairments noted under the effects of startle and surprise.

Inadequate HF activities/HF specialist involvement and the effect on safety, efficiency, effectiveness, and project timeline (SI-3014)
When a HF intervention is proposed, there are implicit questions including ‘Will that make a safety enhancement difference?’ and ‘Can that be measured/qualified with respect to safety effectiveness and operational efficiency?’. Succinctly, what is the cost and safety impact of investments in HF and HF-related organisational interventions? Being able to evaluate the effect of HF’s activities and knowing at which point in a process to involve HF professionals is an important element of a successful project.

Integration of HF/HP principles into the organisations management system (SI-3004)
An organisation is made up of humans, procedures and processes, which work together, often in a hierarchical manner and interacting to achieve a common goal. As such, the organisation’s management system cannot be fully effective unless it has integrated HF considerations and HP principles in a practical manner.
Knowledge development and sharing (SI-3008)

Knowledge sharing, particularly of tacit knowledge, is difficult to do well. This makes knowledge retention in situations of increased staff turnover very difficult. Knowledge development and sharing is about developing the right knowledge and making this knowledge available to the right people at the right time.

Lack of evaluation of adverse impact of culture on human performance (SI-3002) (Amended)

Organisational culture has a significant impact on HP, but this is not generally recognised across the aviation industry. From a HF and safety perspective, there is a vast amount of diverse and inconsistent information about how organisational culture affects safety.

For example, with the ‘economic survival’ effect — or when the ‘commercial benefit’ dictates the running of the organisation too much, leading to a lack of resources; stressful environment; no training policy; too much operational pressure and time pressure; too many subcontracting activities; insufficient maintenance or aerodrome or ATC equipment; and so on. These observations clearly demonstrate a challenge from regulatory, safety and HF perspectives.

Lack of focus on risk-based decision-making in complex systems (SI-3016) (Amended)

Decision-making in aviation-related activities can be complex, pressing and involve a high risk. Yet it plays a key role in achieving safe outcomes in every stage (i.e., design, production, operation, maintenance of products, systems, and processes) and in every stakeholder (i.e. original equipment manufacturers (OEMs), operators, aerodromes, air navigation service providers (ANSPs), continuing airworthiness management organisations (CAMOs), aircraft maintenance organisations (AMOs), etc.). Operational decisions made by frontline operators (i.e. pilots, cabin crew, ATCOs, engineers, technicians, ground handlers, airport staff) and the strategic decisions made by leadership/management in an organisation and regulatory authorities can have a huge impact on safety.

Lack of industry-wide staff support programmes (SI-3012)

The EASA-led Task Force on Germanwings Flight 9525 identified a number of safety risks, including the need for pilot support programmes. However, humans throughout the aviation system need such support programmes. This has been highlighted in particular throughout and after the COVID-19 pandemic, where aviation professionals have worked under high pressure and often in isolating circumstances.

Refer also to ‘State of well-being and fit for duties (SI-3024)’.

Limitations to root cause analysis (SI-3018)

Investigations into incidents and hazard observations often result in poor or ineffective interventions because investigations pursue straightforward root causes of the issue. Shallow investigations often address symptoms of the event rather than the error-prone conditions, and consequently rarely prevent reoccurrence.

Senior management competence and commitment to HF/HP principles (SI-3001)

Operators, maintenance organisations, manufacturers, national competent authorities, and other entities that contribute to continuing safety and efficiency strive to promote the process of positive organisational cultural change. Positive cultural evolution requires cooperation and shared values across all levels of management and workers. Corporate safety culture is particularly affected by the values and actions of senior management. Senior leaders need to understand and communicate the critical significance of HF and HP to all members of staff.
State of well-being and fit for duties (SI-3024 previously SI-0005) (Transferred)

Flight crew have to be fit and well both physically and mentally to conduct a flight safely. This is achieved by ensuring the well-being of flight crew through the introduction of procedures for airlines to assess the conditions of flight crew and well-being initiatives in the airline. These efforts should be undergirded by an effective regulatory framework.

Refer also to ‘Lack of industry-wide staff support programmes [SI-3012]’.

Training effectiveness and competence (SI-3011)

Despite the obvious technological advances that have made the aviation industry safer and more efficient in the last few decades, the way that those working in the industry are trained has not changed significantly. ICAO has sought to address this through the development of competency frameworks; however, organisations and States need to assure themselves that they fully appreciate how to utilise competency frameworks to their best advantage, whilst striving for a shared understanding of terms and concepts.
4. Commercial air transport — aeroplanes — CAT A

The CAT Aeroplanes Safety Risk Portfolio was first developed in 2016 by the Agency, in conjunction with the CAT A CAG, and has since been reviewed annually. Each safety issue contributes to one or more key risk areas as defined in the Introduction of this Volume.

The scope of the portfolio is commercial air transport (CAT) passenger and cargo operations conducted by EASA and EASA Member State (MS) air operator certificate (AOC) holders with complex aeroplanes and EASA Member State (MS) registered, or operated complex aeroplanes carrying out non-commercial complex (NCC) operations.

Regarding the main key risk areas for this domain, refer to the EASA ASR 2022 Section 2.4 ‘Safety risks for CAT and NCC aeroplanes’ Figure 2.19 ‘KRAs by aggregated ERCS score and number of risk-scored occurrences involving CAT large aeroplanes and NCC aeroplanes’. These key risk areas are defined by their potential accident outcome and by the immediate precursors of that accident outcome. The figure is obtained by aggregating the ERCS score for the risk-scored occurrences relevant to this domain and plotting it against the number of risk-scored occurrences. The risk picture of this domain identifies the key risk areas of greater concern that are airborne collision, collision on runway, aircraft upset and runway excursion.

The safety issues in the portfolio are sorted into the ‘Assess – Elevated priority index’, ‘Assess – Normal-to-low priority index’, ‘Mitigate – define’, ‘Mitigate – implement’, and ‘Monitor’ categories, which provide a snapshot of their status within the European SRM process by priority. The safety issue prioritisation method is described in the Introduction of this Volume. To understand each safety issue better, please click on the safety issue in the list to access their description.

Currently there are 37 safety issues in the CAT A Safety Risk Portfolio. Since the last edition, no new safety issues have been added. One safety issue, SI-5017A ‘Airline systems vulnerability leading to disruptions due to cyber attacks’ was transferred from the Systemic and conjunctural Safety Risk Portfolio, marked with (Transferred), 1 safety issue, SI-0005 ‘State of well-being and fit for duties’ has been transferred to the Human factors/human performance Safety Risk Portfolio, and another one, SI-0050 ‘Inadequate management of repetitive defects’ to the Airworthiness Safety Risk Portfolio. 12 safety issues were amended.


For the safety issues tagged ‘CC effect’ in this portfolio, the effects of climate change that are under scrutiny are added.

Refer to Appendix A for the link between safety issues and key risk areas.

The BIS was completed for SI-0015 ‘Entry of Aircraft Performance Data’.

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**List 4-1: Commercial air transport — aeroplanes (CAT A) safety issues per category & priority**

**Assess – Elevated priority index**

- Inappropriate flight control inputs (SI-0010)
- Fatigue (FTL) (SI-0039)
- Insufficient crew resource management (CRM) (SI-0009) (Amended)
Assess – Normal-to-low priority index

- False or disrupted ILS signal capture (SI-0035)
- Over-reliance on satellite navigation (SI-0034)
- Adverse convective weather (turbulence, hail, lightning, ice) (SI-0003) (CC effect) (Amended)
- Mishandling of non-precision approaches (SI-0037) (Amended)
- Gap between certified take-off performance and take-off performance achieved in operations (SI-0017) (CC effect) (Amended)
- Encoding of required navigation performance approaches (RNP APP) in Flight Management Systems (FMS) (SI-0051)
- Safety education of air passengers (SI-0052)

Mitigate – define

- Approach path management (SI-0007)
- Entry of aircraft performance data (SI-0015) (CC effect) (Amended)
- Alignment with wrong runway (SI-0014)
- Poor language proficiency causing communication break-down (SI-0054)
- Volume and quality of the information in NOTAMs (SI-0044)
- Emergency evacuation (SI-0042)

Mitigate – implement

- Icing in flight (SI-0001) (CC effect) (Amended)
- Deconfliction of IFR and VFR traffic (SI-0043) (Amended)
- Effectiveness of safety management (SI-0041)
- Clear air turbulence and mountain waves (SI-0018)

Monitor

- Fuel management (SI-0025)
- Explosive door openings on parked aeroplanes (SI-0048)
- Wake vortex encounter (SI-0012)
- Fuel contamination and quality (SI-0011)
- Congestion/interference of the electromagnetic spectrum (5G) (SI-0053)
- Hail (SI-0003A) (CC effect) (Amended)
- Bird/wildlife strikes (SI-0045)
- Handling and execution of go-around (SI-0019)
- Airline systems vulnerability leading to disruptions due to cyber attacks (SI-5017A) (Transferred)
- Wind shear (SI-0024) (CC effect) (Amended)
- Icing on ground (SI-0002) (CC effect) (Amended)
- Carriage and transport of lithium batteries (SI-0027)
- Runway surface condition (SI-0006) (CC effect) (Amended)
- Flight crew incapacitation (SI-0049)
- Laser illumination (SI-0046)
- Disruptive passenger (SI-0047)
- Excessive speed in manoeuvring area (SI-0028)
Adverse convective weather (turbulence, hail, lightning, and ice) (SI-0003) (CC effect) (Amended)

This safety issue addresses the ability and capability of the flight crew to manage the entire flight, including dispatch, and the possibility to detect, avoid and/or mitigate the effects of adverse convective weather on the flight. If not managed well, a flight crew may experience aircraft upset after being forced out of its flight envelope by a severe atmospheric phenomenon, or a significant degradation in performance or the handling qualities of the aircraft, or injuries due to abrupt movements. It also reviews the requirements for the aircraft to fly in certain atmospheric conditions. The main threats of convective phenomena affecting the flight, such as convective turbulence, up/down-drafts, wind shear, hail precipitation, lightning, and icing are reviewed in this safety issue.

Effects of climate change under scrutiny

With climate change, severe convective storms may become more frequent and/or intense, and the safety risks caused by the associated threats for CAT aeroplanes may increase. For example, some research works suggest a significant increase of hail precipitation with hailstone size exceeding 5 cm over Europe, and an increase of the lightnings activity.

Airline systems’ vulnerability leading to disruptions due to cyber attacks (SI-5017A)

Airline systems may be vulnerable to hacking, causing major disruptions to the air traffic system.

Alignment with the wrong runway (SI-0014)

Unintended landing, approach, or take-off of an aircraft on/to/from a wrong landing/take-off surface can lead to excursions or collisions. It includes cases of landing on/take-off from a taxiway or other surface mistakenly identified by the flight crew as the assigned runway. The mistake could be due to visual acquisition, wrong data entered in the flight management system (FMS) or miscommunication between ATC and the flight crew. Other contributing factors include complex aerodrome design, multiple runway thresholds located near one another and other aerodrome-design-related complexities. The safety issue includes the relevant standard operating procedures (SOPs) and the flight crew training, the ATS procedures and the lighting and marking of the aerodrome surfaces.

Approach path management (SI-0007)

This safety issue addresses the inappropriate execution of an approach at any point from FL100 until reaching safe taxiing speed. This can lead to runway excursions, aircraft upset, terrain collision, or airborne collision. It covers all types of instrumental and visual approaches. The following areas are reviewed in this safety issue:

- Management of the energy of the aircraft and the influence of external factors affecting the approach, such as tail or crosswind, windshear, down/up drafts and other weather-related factors;
- Decision-making process of the flight crew to go around or continue with the approach; and
- SOPs and the relevance of those procedures for the approach flown, flight crew training and the existing regulatory framework.

In addition to addressing this safety issue from a flight crew perspective, this safety issue also explores ATM-related factors that may lead to non-stabilised approaches. These include ATCO instructions (e.g. vectoring, intermediate level-off) that result in a high descent profile for the flight crew or bring the aircraft too close to the runway. This safety issue is linked to the ‘ATM influence on non-stabilised approaches’ (SI-2010) in the ATM/ANS Safety Risk Portfolio.

Related SIBs:
EASA 2023-03: Incorrect Barometric Altimeter Setting
Bird/wildlife strikes (SI-0045)
Insufficient control of birds and wildlife may lead to either damage to the aircraft or loss of control during take-off or landing. This safety issue addresses the inadequate uncontrolled/excessive presence of birds/wildlife in the aerodrome vicinity, and reviews the controls in place by the different stakeholders e.g. aerodrome operators, aircraft operators, aircraft/engine manufacturers, certification authorities, environment protection agencies, etc.

Carriage and transport of lithium batteries (SI-0027)
Lithium batteries carried or contained in electronic devices on board carry a risk of fire in the aircraft. These batteries may potentially ignite due to a thermal runaway, self-ignition or other heat sources. Lithium batteries may be carried on board an aircraft as part of a cargo shipment, check-in luggage of the passengers in the cargo holds or in the cabin in personal electronic devices carried by the passengers or crew.

Clear air turbulence and mountain waves (SI-0018) (CC effect) (Amended)
Clear air turbulence and turbulence generated by high mountains (mountain waves) are weather phenomena that may result in aircraft upset or injuries/damages. To cope with the effects of such turbulence and mountain waves, it is important to train flight crew to identify and avoid such phenomena and ensure that the relevant SOPs are implemented. These efforts should be complemented by the provision of information from external sources, such as ATC or pilot reports (PIREP), during the flight. The issue also covers the preparation of the flight and the availability of information to enable the flight crew to foresee a possible encounter with such phenomena during the flight.

Effects of climate change under scrutiny
With climate change, moderate-or-greater clear air turbulence associated with jet streams may become more frequent in the future. For example, some research works suggest a significant increase in the probability of encountering moderate-or-greater clear air turbulence at cruise flight levels over the North Pacific, South-East Asia and the North Atlantic.

Congestion/interference of the electromagnetic spectrum (5G) (SI-0053)
The electromagnetic spectrum is crucial to the management of aviation activity as frequencies are required for ATM and ground movements control, navigation aids, weather and ATC radars, radio-altimetry, air-air communications, terrain and ground collision avoidance systems. The spectrum is becoming increasingly congested as traffic levels grow and the increasing demand for bandwidth from other users such as telecoms, radio and television services have led to some portions of the spectrum previously allocated to aviation being diverted for this purpose. This in turn leads to equipage changes (e.g. radar frequencies) and radiotelephony (RTF) frequency congestion. The proximity of competing users can have interference effects that cannot be managed or controlled by either user.

The roll-out of 5G across the world will have an impact on navigational equipment. The issue is that the equipment may not be robust enough against certain 5G frequency bandwidths. In some countries the two (aircraft navigational equipment and 5G networks) may not be able to co-exist.

It also includes the potential for interference from 5G transmissions from the passenger cabin.

Insufficient crew resource management (CRM) (SI-0009) (Amended)
The issue encompasses all aspects of the communication that may impact the situational awareness of the crew members and/or the conduct of the flight, including lack of a common action plan, inadequate division of duties, poor coordination between crew members, use of non-standard phraseology, sensory overload (loss of communications, multiple aural messages, etc.), etc. Good CRM can be achieved by implementing relevant training for flight crew and an effective regulatory framework for CRM requirements. The goal of CRM is to maximise the available resources, through effective communication and efficient workload management.
Deconfliction of IFR and VFR traffic (SI-0043) (Amended)

Ineffective deconfliction of flights adhering to instrument flight rules (IFR) and visual flight rules (VFR) in an airspace class where at least one of the flights is not under ATC separation has been identified as a strong contributor to airborne collision risk. Such airspace classes include class E, controlled airspace where VFR flights are not subject to ATC clearance and no IFR-VFR separation is provided by ATC, and class G, where neither IFR flights nor VFR flights are subject to ATC clearance and ATC does not provide any separation service. The safety issue arises due to the fragmented knowledge of the traffic situation as some traffic is subject to ATC clearance (i.e. IFR) and some other traffic is not (i.e. VFR). ATC may not be aware of VFR flights or their intentions and potentially may not pass traffic information to the IFR traffic. In addition, some of the VFR traffic may not be equipped with airborne collision avoidance system (ACAS) or even a transponder (C or mode-S), reducing the conspicuity of VFR traffic. As a result, both IFR and VFR traffic have to rely solely on the visual acquisition by the flight crew to maintain separation. This safety issue addresses how the conspicuity of VFR traffic can be improved as well as best practices to underscore the importance of existing procedures in maintaining airborne separation. This safety issue is captured in the Non-Commercial operations – small aeroplanes safety risk portfolio and is also relevant to the ATM/ANS domain.

Disruptive passengers (SI-0047)

Disruptive passengers are defined as passengers who do not follow safety procedures or instructions from the cabin crew. Such behaviour is normally associated with the consumption of alcohol, drugs and certain types of medication. However, it may be also the result of stress or emotional distress. It is important to subdue these passengers as they may pose a safety threat to other passengers or the cabin crew. To achieve this, airlines have to design effective procedures and train cabin crew to handle such situations in a safe manner.

Effectiveness of safety management (SI-0041)

Aviation organisations are required to implement safety management systems as part of their safety programmes. This issue reviews an ineffective implementation of safety management system by the aviation organisations. The complex nature of aviation safety and the significance of addressing HF aspects show the need for an effective management of safety by the aviation organisations. This issue covers the regulatory requirements and promotion of SMS principles, for both aviation authorities and organisations, and the capability to detect, anticipate and act upon new emerging threats and associated challenges. It also includes the settling of the adequate safety culture in organisations and authorities. This issue had deteriorated in the context of the COVID-19 pandemic; refer to ‘Reduced focus on, or prioritisation of safety’ (SI-5009).

Emergency evacuation (SI-0042)

The safety issue refers to the unsuccessful evacuation of an aircraft after an emergency. The areas of risk identified are:

- hand luggage amount blocking the aisle preventing or slowing down the evacuation;
- passengers taking hand luggage preventing or slowing down the evacuation; and
- emergency evacuation with the aircraft engine still running.

This safety issue considers the passenger behaviour and compliance with safety instructions, the decision-making for the flight crew to command the evacuation, the cabin crew to adequately execute it, and the certification requirements to ensure the adequacy of equipment and aircraft systems. As such, relevant SOPs, training for both flight and cabin crew, and the relevant regulatory requirements have to be reviewed to ensure the safe and efficient egress of all passengers during an emergency.
Encoding of the required navigation performance approaches (RNP APP) in flight management systems (FMS) (SI-0051)

The naming of the performance-based navigation (PBN) approach procedure is not standardised throughout the world. It is also inconsistent with the PBN navigation specifications. Examples of different naming: RNAV (GPS) RWY XX, RNAV (GNSS) RWY XX, RNAV (RNP) RWY XX. Chart identification and FMS encoding differences may lead to confusions and misunderstandings amongst crew. Procedure requirements are not always clearly understood e.g. specifications versus requirements (RF, RNP, missed approach RNP). The situation is the same as regards understanding of the minima (LNAV, LNAV/VNAV and LPV).

Another issue will be the data storage capacity and encoding capability of the on-board equipment against the number of approaches and different encoding requirements (e.g. letter designator for circling approaches, Z–Y, etc., when more than one approach exists).

Entry of aircraft performance data (SI-0015) (CC effect) (Amended)

The incorrect entry of data into the FMS that is used to set the take-off or landing performance parameters of the aircraft can have catastrophic consequences. This can potentially occur due to miscommunication errors, errors in electronic flight bags (EFBs), entry of data into FMS, last-minute changes by ATC and load masters, and the incorrect calculation of the performance parameters. To mitigate this safety issue, technical solutions are being considered for the long term; in the short to medium term, the focus will be on improvements to SOPs.

Effects of climate change under scrutiny

With climate change, more airports may be exposed to periods of very high air temperature, with effects on take-off performance of aeroplanes and on the cooling down of brakes. The prevailing direction of surface winds may change too. For example, some research works suggest that the number of days where the take-off weight has to be decreased to ensure a safe take-off will significantly increase at some airports.

Excessive speed in the manoeuvring area (SI-0028)

Excessive ground speed of the aircraft during taxiing at the aerodrome before take-off or after landing may lead to collision on ground, injuries or damages. This safety issue includes also taxiing phases on the runway, e.g. back tracking. Such occurrences may occur due to lapses in SOPs and the associated trainings for the flight crews as well as due to poorly designed aerodrome procedures.

Explosive door opening (SI-0048)

When an aeroplane is parked, cooling or heating of the aeroplane cabin can be provided through the air-conditioning system powered up by the auxiliary power unit (APU) or by an external source of air (e.g. ground air-conditioning cart) ducted to the aeroplane cabin. Closing all aeroplane doors helps to reach and maintain the desired temperature. However, it may also result in an undesired build-up of excessive differential pressure between the cabin and the outside environment if the outflow valve is closed. As a result, this may cause an explosive door opening that can lead to injuries or damages. This may happen during normal operation of the aeroplane, during maintenance activities, or when conducting practical training of personnel on the aeroplane on ground.

False or disrupted instrument landing system (ILS) signal capture (SI-0035)

Aircraft on approach may potentially capture a false or disrupted ILS or localiser signal due to several factors:

- technical issues with the ILS; or
- interference of the ILS signal by obstacles, aircraft, and vehicles in the sensitive ILS areas; or
- inadequate approach procedures leading to the capture of upper/lower/side lobes.
A false or disrupted capture may lead to terrain collision or runway excursion. Due to its multi-faceted nature, this safety issue also includes the review of existing safety barriers implemented by different stakeholders, such as the CNS providers, aerodrome operators, ATS, aircraft operators, manufacturers as well as regulators.

**Fatigue (FTL) (SI-0039)**

Fatigue can negatively affect aircrew performance in the aircraft and pose a hazard to flight safety. In commercial air transport, aircrew rosters are traditionally developed on the basis of prescriptive duty time limits, flight time limits, minimum rest requirements and other constraints such as minimum notification times and prohibition to combine certain duties, to name a few. These limits and requirements, referred to as flight time limitations (FTL), are presumed to be adequate for maintaining aircrew fatigue at levels that will not put at risk the safety of flight operations. Note that general fatigue issues that are not limited to flight crew fatigue, such as quality sleep, are managed under ‘Fatigue and quality sleep’ (SI-3005) in the Human factors Safety Risk Portfolio.

Related SIBs:
- EASA SIB 2023-05: Possible Risks Emerging During Summer 2023

**Flight crew incapacitation (SI-0049)**

This safety issue relates to pilot incapacitation, not being able to perform his/her duties and associated risks.

**Fuel contamination and quality (SI-0011)**

This safety issue relates to the upload of contaminated fuel in the aircraft or to fuel being contaminated once stored in the aircraft fuel system. This safety issue covers all types of contamination from water, algae, polymers, etc.; anything that is sufficient to cause an in-flight shutdown of the engines or to affect adversely the delivery of power from the engines. It also includes the supply chain of fuel that may be the cause of the contamination, the oversight capabilities of the aircraft operators and the regulatory framework of both the fuel supply and the operators’ oversight.

Additionally, it includes the non-compliance with the technical specification for specific fuel type, resulting in wrong flash point, wrong concentration of any required chemical component, etc.

**Fuel management (SI-0025)**

Inadequate management of the fuel to perform the flight that may lead to aircraft upset or collision with terrain. This involves fuel planning, calculation, and the management once the flight has commenced i.e. defined as the point when the first engine has started. It includes the communication and coordination of the flight crew with ATC and the operations department of their organisation, the relevant SOPs, fuel policy and training of the flight crew.

**Hail (SI-0003A) (CC effect) (Amended)**

This safety sub-issue of the adverse convective weather safety issues group (SI-0003) focuses on the ‘hail’ phenomenon/precipitation. It is relevant for the take-off/climb and approach/landing phases of flight.

Effects of climate change under scrutiny
See SI-0003.

**Gap between certified take-off performance and take-off performance achieved in operations (SI-0017) (CC effect) (Amended)**

One type of incorrect rotation is slow rotation rate performed by the flight crew at take-off, with the aim of avoiding tail strikes. This is especially critical in short- and high-altitude runways as too slow rotations there
can lead to runway excursions, aircraft upset, or terrain collision. The most critical scenario is a heavy aircraft, typically a long-haul flight by a large four-engine aircraft with high payload, in short high-altitude runways. Relevant SOPs and training for flight crew have to be reviewed and implemented to ensure that flight crew rotate the aircraft at the correct rate during take-off.

**Effects of climate change under scrutiny**

See SI-0015.

**Handling and execution of go-arounds (SI-0019)**

Inadequate execution of the go-around manoeuvre may lead to aircraft upset, runway excursion, injuries or damages, or collision with terrain. It is the deviation from the SOPs and published go-around procedures. It covers the HF relevant during this manoeuvre (e.g. somatogravic illusion, breakdown of CRM). It includes the procedures and training of the flight crew, and the adequacy of those, regarding go-around with all engines operating (workload).

**Icing in flight (SI-0001) (CC effect) (Amended)**

Icing in flight may occur due to various reasons, however, this safety issue is focused on the manifestation of icing during flight caused by an atmospheric icing phenomenon. The typical manifestation is the accretion of ice on aerodynamic surfaces, probes, engine parts or flight control system, leading to degradation of handling quality or performance issues, system failures or malfunctions, or damages on aeroplane's structure. When such icing occurs, it is important to ensure that the flight crew is able to recognise the situation and manage the flight in adverse icing conditions. Other sources of icing, such as frozen water leaks from the waste water aircraft system, are excluded from this safety issue. This safety issue is also relevant to the Non-commercial operations — small aeroplanes domain.

**Effects of climate change under scrutiny**

Climate change is affecting the air temperature and humidity. Moderate and severe airborne icing conditions may become more frequent, more intense, or they may affect larger ranges of altitude, increasing the risk exposure during the flight.

**Icing on ground (SI-0002) (CC effect) (Amended)**

Icing on the ground may occur due to an atmospheric icing phenomenon and the adverse effect of the de-icing/anti-icing fluids. If managed poorly, the flight crew may experience aircraft upset or collision with terrain after take-off, runway excursion, injuries or damages. It is crucial to ensure relevant SOPs and training are implemented to ensure that flight crew are able to recognise and manage the effects of adverse icing conditions experienced during the ground phases of flight. This safety issue is also relevant to the Non-commercial operations — small aeroplanes domain.

**Effects of climate change under scrutiny**

See SI-0001.

**Inappropriate flight control inputs (SI-0010)**

Flight crew may inadvertently introduce flight control inputs which may result in a deviation from actual or intended immediate flight path. Depending on the circumstance and magnitude of input, inappropriate flight control inputs may result in an undesirable safety consequence, such as aircraft upset, runway excursion, injuries or damage. It also addresses the HF affecting the flight crew performance, for instance, by reducing their cognitive capacity to recognise the situation and react appropriately.
Laser illumination (SI-0046)
Even though it is illegal to shine a laser device at an aircraft in most countries, such errant behaviour still occurs and puts flight crews at risk of temporary or permanent blindness. It may result in pilot distraction, temporary vision impairments and, in serious cases, ocular injury. These effects may pose significant flight safety hazards in critical phases of flight during approach and landing near airports.

Mishandling of non-precision approaches (SI-0037) (Amended)
The safety issue refers to the erosion of pilot skills to conduct non-precision approaches as most airline pilots are not required to conduct such approaches frequently. The high standards and wide spread of precision approaches, including the increasing number of PBN, are reducing the exposure, and limiting non-precision approaches to isolated cases (e.g. en-route diversion). The safety issue covers the training and SOPs for the flight crews on non-precision approaches. This safety issue is linked with ‘Approach path management’ (SI-0007).

Poor language proficiency causing communication breakdown (SI-0054)
The use (or misuse) of language can contribute directly or indirectly to an accident. Therefore, a minimum standard level of knowledge of the language used for communication mainly between pilots and ATCOs is critical to flight safety.

ICAO standardised phraseology should be used whenever possible. Also, when phraseology is not applicable, pilots and ATCOs should demonstrate a minimum level of proficiency in plain language.

The effective use of plain language is vital in routine operational situations in which phraseology provides no ‘ready-made’ form of communication and is especially critical in unusual or emergency situations.

Inevitable language errors should always be considered and judged in the wider context of miscommunication or failure to communicate successfully. The recognition of these errors contributed to the construction of ICAO Operational Level 4 which is considered to be the minimum level acceptable to ensure safe operations.

Over-reliance on satellite navigation (SI-0034)
This safety issue refers to the increasing reliance on satellite-based navigation and the potential impact of the associated vulnerabilities on the safety of the flight. Such vulnerabilities include jamming, spoofing and over-reliance of flight crew on satellite-based navigation. Over-reliance on satellite-based navigation may lead to complacency resulting in inadequate pre-flight preparation and potential loss of orientation when the GNSS unit fails. It covers the equipment on board, the SOPs, training, and navigation procedures published. The procedure of key interest is the procedure to revert to other means of navigation in critical flight phases should the GNSS unit malfunction in flight. Wrong position information has severe repercussions as it can lead to airspace infringement, MAC, or trigger false TAWS events which might result in increased controlled flight into terrain (CFIT) risk. Related with SI-5501A GNSS signal manipulation leading to navigation or surveillance degradation.

Related SIBs:

Runway surface condition (SI-0006) (CC effect) (Amended)
The mismatch between the actual status of the runway surface condition and the one used to calculate the aircraft landing performance may lead to runway excursions. This includes the measurement systems, the methodology to assess the runway surface condition and the reporting methods used to communicate said condition to the flight crews in approach. This safety issue also addresses the calculation methods used by the
flight crew provided by the operator in the aeroplane flight manual (AFM)/ flight crew operating manual (FCOM) and the performance data provided by the aircraft manufacturer.

**Effects of climate change under scrutiny**
Climate change may increase the occurrence of heavy precipitation events causing sudden runway flooding.

**Safety education of air passengers (SI-0052)**
Poor air passenger understanding of residual risks inherent in commercial air transport operations is likely to result in failure to comply with safety instructions and advice, with a consequent increase in the risks borne by crew and other passengers.

The understanding by the passengers of the cabin crews’ safety role in the cabin (that is not only limited to assistance and selling). Instructions need to be obeyed, the safety purpose understood, attention to briefings paid, especially when relevant to coping with potential distress situations/evacuation.

**Volume and quality of the information in NOTAMs (SI-0044)**
With the steady growth in the number of notices to airmen (NOTAMs), flight crew are increasingly challenged in processing the volume of information during their pre-flight preparation. It is hard to identify the most important and relevant information, which may result in the flight crew overlooking safety-critical information. This is also exacerbated by the inconsistent quality of the information provided in NOTAMs. The content of a NOTAM does not always adhere to ICAO standards and the use of non-standard acronyms may create confusion or a delay in understanding the content. The safety issue explores the different mitigations which can be adopted in the short to medium term while the long-term solution of digital NOTAMs is implemented incrementally across Europe.

**Wake vortex (SI-0012)**
The safety issue refers to the encounter with the wake turbulence of a preceding aircraft, which may lead to the upset of the trailing aircraft. It includes the possible ATS role in providing separation of the traffic, the SOPs for flight crews to stay away from the wakes of other aircraft and their associated training. Due to the differences in ATS procedures, encounter geometries and mitigation strategies, the safety issue can be divided in two scenarios: ‘encounters during arrival and departure’ and ‘en-route encounters’.

**Windshear (SI-0024) (CC effect) (Amended)**
The encounter with windshear on final approach, landing, take-off, and initial climb may lead to aircraft upset or runway excursions. Effective SOPs and the training for the flight crew should be implemented by airlines to ensure that flight crew are well-equipped to avoid or deal with those conditions. Such efforts should also be supplemented by detection of potential windshear by third parties, such as ATC, and the effective relay of this information to the flight crew.

**Effects of climate change under scrutiny**
See SI-0003.
5. Rotorcraft — RTR

The Rotorcraft Safety Risk Portfolio was first developed in 2021 by the Agency, in conjunction with the European Safety Analysis Group for Rotorcraft (ESAG-R) and has since been reviewed annually. Each safety issue contributes to one or more key risk areas as defined in the Introduction of this Volume.

Regarding the main key risk areas for this domain, refer to the EASA ASR 2023 Sections: 3.2 Safety risks for commercial air transport helicopters Figure 3.16 ‘Key risk areas by aggregated ERCS score and number of risk-scored occurrences, involving commercial air transport helicopters’; 3.3 Safety risks for specialised operations helicopters Figure 3.24 ‘Key risk areas by aggregated ERCS score and number of risk-scored occurrences, involving specialised operations helicopters’; and 3.4 Safety risks for non-commercial operations helicopters Figure 3.32 ‘Key risk areas by aggregated ERCS score and number of risk-scored occurrences involving non-commercial operations helicopters’. These key risk areas are defined by their potential accident outcome and by the immediate precursors of that accident outcome. This figure is obtained by aggregating the ERCS score for the risk-scored occurrences relevant to this domain and plotting it against the number of risk-scored occurrences. The risk picture of this domain identifies the key risk areas of greater concern that are aircraft upset for commercial air transport helicopters, specialised operations with helicopters, and non-commercially operated helicopters.

The safety issues in the portfolio are sorted into the ‘Assess – Elevated priority index’, ‘Assess - Normal-to-low priority index’, ‘Mitigate – define’, ‘Mitigate – implement’, and ‘Monitor’ categories, which provide a snapshot of their status within the European SRM process by priority. The safety issue prioritisation method is described in the Introduction of this Volume. To understand each safety issue better, please click on the safety issue in the list to access their description.

EASA continues to develop and implement safety enhancement initiatives from various sources as per the EU SRM process, discussed in the Agency’s CAGs and reviewed by the Agency itself. The following high-risk categories of occurrences have been identified as safety priorities as presented in the Annual Safety Review (ASR):

- Loss of control in-flight (LOC-I);
- Controlled flight into terrain (CFIT);
- Collision with obstacle(s) during take-off and landing (CTOL).

EASA uses these high-risk categories of occurrences as a baseline in its safety analysis to achieve a continuous reduction of safety risks. The following main contributing factors have been identified in the initial or preliminary accident investigation reports for 2022:

- Degraded visibility condition, leading notably to LoC-I
- The non-detection of power cables, leading to collision with cables notably in low-altitude operations (LALT)

Since the last edition, 2 new safety issues have been added, 6 amended and 5 removed. The safety issue assessment was completed for safety issue ‘Inadequate obstacle clearance during any flight phase’ (SI-8031). It is now in the BIS stage of impact assessment.

Deliverables (articles, videos, posters, manuals and guidelines, events, webinars, etc.) address high-priority safety issues, including:

- LOC-I, including due to vortex ring state (VRS) and unanticipated yaw (UW);
- Degraded visual environment (DVE) and unintended flight into instrument meteorological conditions (UIMC), also called inadvertent flight into instrument meteorological conditions (IIMC) or visual flight rules into instrument meteorological conditions (VFR into IMC);
- Collision with cables, especially in LALT;
- CFIT;
• MAC;
• Fire risk; and
• Risks specific to hoist and sling load operations.

The following are some of the initiatives to improve safety:

• ‘Inadvertent flight into IMC’ (SI-8051) which is a sub-issue of ‘Impaired visibility conditions except IMC’ (SI-8019), a well-known severe risk that can result in various accident types, notably LOC-I, CFIT, collisions with obstacles or cables especially in LALT, and MAC;
• ‘Loose object in the helicopter cabin’ (SI-8050) which highlights the risk posed by loose items in the cabins.

With the first edition of the Airworthiness Safety Risk Portfolio published this year, safety issues of the rotorcraft domain, that were identified as suitable for transfer to the airworthiness domain, are now addressed in Section 9 (e.g. SI-9007 ‘Helicopter rotor and transmission system failures’, former SI-8001). Amongst the safety issues that were transferred to the Airworthiness Safety Risk Portfolio, 5 of them were eventually not included:

• SI-8002 ‘Helicopter system failures — other than rotor and transmissions’: The scope of the safety issue was considered way too broad from a system design standpoint to define meaningful mitigating actions. Helicopter hoist systems and external sling load systems were excluded from the scope as otherwise addressed in specific safety issues (resp. SI-8037 and SI-8038).
• SI-8004 ‘Improper management of helicopter continuing airworthiness’: The reports of serious incidents and accidents mapped with this safety issue were carefully reviewed. Only one non-fatal accident of a very small helicopter with piston engine related effectively with the subject safety issue, where the accident could have likely been prevented had the overhaul of the main gearbox taken place within the specified overhaul interval.
• SI-8005 ‘Helicopter-maintenance-related issues’: Maintenance is addressed by the Airworthiness Safety Risk Portfolio (as design and production, including organisations thereof). The scope of the safety issues is however defined at a lower level of granularity, so that meaningful and actionable safety issues related to maintenance are identified within the frame of that portfolio.
• SI-8008 E-VTOL-systems-related issues: There is currently no existing e-VTOL certified and operated in Europe.
• SI-8023 Inadequate flight path management during manual control

List 5-1: Rotorcraft safety issues per category & priority

Assess – Elevated priority index

Facilitates Step 2: Assessment of safety issue

• Inadequate obstacle clearance during any flight phase (SI-8031) (Amended)
• Unanticipated yaw/Loss of tail rotor effectiveness (SI-8024)
• Poor pre-flight planning and preparation (SI-8017)
• Poor operational management at take-off and landing sites (SI-8034) (Amended)
• Inadequate flight path management with the use of automation (SI-8022)

Assess – Normal-to-low priority index

Facilitates Step 2: Assessment of safety issue

• Lack of knowledge of aircraft systems and application of procedures (SI-8011)
• Insufficient safety culture of organisation (SI-8045)
• Loose object in the helicopter cabin (SI-8050) (New)
Mitigate – define

Facilitates Step 3: Definition and programming of safety actions

NIL

Mitigate – implement

Facilitates Step 4: Implementation and follow-up of safety actions

- Inadequate airborne separation under VFR operation (SI-8028)
- Impaired visibility conditions except IMC (SI-8019) (Amended)
- Inadvertent flight into IMC (SI-8051) (New)
- Pilot fatigue (SI-8016) (Amended)
- External-sling-load-operations-related issues (SI-8038)
- Hoist-operations-related issues (SI-8037)
- Inadequate handling of simulated technical failures and abnormal procedures during a training flight (SI-8027)
- Ineffective safety management systems (SI-8044)
- Vortex ring state (SI-8025)
- Inadequate training and competence transfer — initial and recurrent training (SI-8015)
- Deficiencies and inconsistencies in operating manuals (SI-8046)
- Bird and other wildlife hazard (SI-8030)

Monitor

Facilitates Step 5: Safety performance measurement

- Engine power loss condition (SI-8026) (Amended)
- Incorrect in-flight decision-making (SI-8014)
- Dynamic rollover (SI-8040)
- Adverse weather encounter — effects other than on impaired visibility (SI-8021) (Amended)
- Incorrect application of operational rules and procedures (SI-8012)
- On-board carriage of PEDs with lithium batteries (SI-8048)
- Ineffective application of crew resource management and multi-crew cooperation (SI-8013)
- Navigation-related issues (SI-8036)
- Interference by lasers (SI-8049)
- Downwash adverse effects (SI-8041)
- Unruly passengers (SI-8042)

Adverse weather encounter — effects other than impaired visibility (SI-8021) (Amended)

This issue refers to environmental conditions encountered during the flight and contributing to aircraft upset situations. It includes icing conditions, lightning strikes, high winds, convective weather phenomena such as windshear, up and down drafts or microburst, and obstacle induced turbulence. The safety issue addresses the identification, avoidance and recovery of such conditions.

Bird and other wildlife hazard (SI-8030)

This issue refers to proximity or actual collision with bird and other wildlife during flight operations, contributing to a possible unsafe outcome. It also includes the lack of control or inadequate warning of bird and wildlife hazard at an aerodrome or any take-off and landing sites.
Deficiencies and inconsistencies in operating manuals (SI-8046)
This issue refers to operating manuals not appropriate, not accurate or out of date. It encompasses the pilot’s operating handbook (POH), the rotorcraft flight manual (RFM), the FCOM, the SOPs, the quick reference handbook (QRH) and the company operating manual Part B.

Downwash adverse effects (SI-8041)
This safety issue relates to helicopter downwash effects such as the blowing of foreign object debris (FOD) which can lead to injuries or damage to third parties on ground, or the recirculation of the snow/dust causing possible damages to the helicopter own engines. This safety issue does not include the effect of impaired visibility (addressed in SI-8019).

Dynamic rollover (SI-8040)
This issue refers to inability to prevent helicopter rollover during take-off, landing or air taxiing/hovering phases. It includes, in particular, the inadequate knowledge of the operating environment (soft landing surface, obstacles), and the inadequate skills to recover after the skid or landing gear enters in contact with possible obstacles and the aircraft started to roll.

Engine power loss condition (SI-8026) (Amended)
This safety issue relates to the inability to safely continue the flight due to a sudden engine power loss or situation requiring the engine to be deliberately shut down in flight.

Multi-engine and single-engine airplanes operate differently during an engine failure. If a failure occurs on a multi-engine helicopter that causes a major, but not total, loss of power on one engine, it is likely that the engine will be shut down as positive engine-out performance is still available, whereas on a single-engine helicopter it may well be decided to make use of the residual power to stretch the glide distance.

It includes, for example, inefficient CRM, inadequate training or abnormal procedures not followed, leading to hard landings or total loss of control in flight.

External-sling-load-operations-related issues (SI-8038)
This safety issue gathers all operational scenarios specific to helicopters flying with external sling load, for both human and non-human cargo, which can contribute to an unsafe outcome. It includes, in particular, sling load falling or contacting terrain or obstacles, sling load contacting the tail rotor, main rotor or fuselage. Unnoticed exceed of the maximum all up mass (MAUM) is also addressed.

Hoist-operations-related issues (SI-8037)
This safety issue encompasses both technical and operational issues specific to hoist operations. It includes hoist malfunctions such as loss of reel in/out functions, hoist cable break due to design issues or due to damages from operational events or inadequate maintenance, but also cable contacts with obstacle or fuselage.

Impaired visibility conditions except IMC (SI-8019) (Amended)
This safety issue relates to all operational situations where the visibility of the flight crew is impaired, causing a loss of visual cues and situational awareness, leading potentially to obstacle collision, terrain collision or aircraft upset. It includes impaired visibility conditions caused by dust or sand (brownout), snow (whiteout), sun glare, smoke, salt spray or any element that degrades the use of visual cues.
Inadequate airborne separation under VFR operation (SI-8028)
This safety issue relates to the inability, during a VFR flight, to detect, avoid or maintain sufficient airborne separation with other manned or unmanned aircraft, increasing the risk of airborne collision. The safety issue addresses both design and operational aspects involved.

Inadequate flight path management with the use of automation (SI-8022)
This safety issue relates to the inability to follow the intended helicopter flight path with the automatic flight control system (AFCS) being active, contributing to an unsafe outcome. The safety encompasses both technical and operational aspects leading to this situation. It includes, in particular, the ineffective use or monitoring of flight parameters and automation modes, and the inadequate management of the transition manual-automated flight.

Inadequate handling of simulated technical failures and abnormal procedures during a training flight (SI-8027)
This safety issue relates to the inability, during a training flight, to handle simulated technical failures such as power loss or hydraulic system failures, contributing to unsafe outcomes. It includes, in particular, the diagnosis of system failures in flight, and the handling of autorotation and forced landing, leading to hard landings or total loss of control in flight.

Inadequate obstacle clearance during any flight phase (SI-8031) (Amended)
This safety issue relates to the inability to identify and safely avoid obstacles during any flight phase, in confined areas or in proximity to natural or manmade obstacles, such as, for example, agricultural work or power lines check, both in urban and natural environments.

Inadequate training and competence transfer — initial and recurrent training (SI-8015)
This safety issue relates to the incomplete or inadequate training content as well as ineffective delivery of training for any personnel involved in helicopter operations, including both initial and recurrent training, causing a degradation of competence transfers within an organisation, impacting the necessary knowledge and skills required to operate safely in normal and emergency operational situations.

Inadvertent flight into IMC (SI-8051) (New) (CC effect)
This safety sub-issue of ‘Impaired visibility conditions except IMC’ (SI-8019) focuses on the safety issue related to a disorientation scenario due to loss of horizon references and/or an accompanying loss of visual contact with the ground. It is a well-known severe risk that can result in various accident types, notably LOC-I, CFIT, collisions with obstacles or cables especially in LALT, and MAC.

This includes also what is called ‘scud running’ where the pilot flies under low clouds close to the ground to reach their planned destination. It also captures the ‘press-on-it’ mentality during a VFR flight where pilots put themselves into unnecessary danger trying to reach their destination.

Incorrect application of operational rules and procedures (SI-8012)
This safety issue relates to the flight crew not complying with SOPs or operational manuals, contributing to an unsafe operation outcome. It includes, for example, operating below weather minima, altitude minima, or beyond the helicopter flight envelope.
Incorrect in-flight decision-making (SI-8014)
This safety issue relates to the cases where flight crew decisions during the flight negatively affect the operational safety. It includes, in particular, the decisions on diversions, or on contingency plans.

Ineffective application of crew resource management and multi-crew cooperation (SI-8013)
This safety issue relates to deficiencies in flight crew coordination, integration, communications and workload management, affecting the decision-making and problem-solving capacity, necessary to operate safely the aircraft.

Ineffective safety management systems (SI-8044)
This safety issue relates to ineffective or incomplete application of safety management systems within organisations, in particular change management, SRM, and safety reporting tools and processes.

Insufficient safety culture of organisation (SI-8045)
This safety issue relates to lack of safety policy, leadership and management, resulting in poor staff engagement for safety in the organisation, as well as poor knowledge of safety reporting and ‘just culture’ principles.

Interference by lasers (SI-8049)
This safety issue relates to events that involve the unintentional or malicious shining of a laser at an aircraft in flight leading to flight crew disorientation or distraction.

Lack of knowledge of aircraft systems and application of procedures (SI-8011)
This safety issue relates to the flight crew lacking the knowledge of the helicopter systems and related procedures necessary to operate safely these systems in normal and abnormal situations, in particular when frequently changing of aircraft types, variants, or configuration/equipment flown.

Navigation-related issues (SI-8036)
This safety issue relates to inadequate or incorrect navigation of the helicopter, both in VFR and IFR operations. It includes, for example, deviations from nominal track, interferences or losses of the radio navigation source as well as issues related to helicopter PBN operations.

On-board carriage of PEDs with lithium batteries (SI-8048)
This safety issue relates to carrying on board of personal electronic devices (PEDs) powered by lithium batteries which contain a risk of overheat and fire ignition in the cargo compartment or in the cockpit.

Loose object in the helicopter cabin (SI-8050) (New)
This safety issue highlights the risk posed by loose items in the cabins of helicopters. It relates to carrying on board of personal electronic devices (PEDs) which may become loose and fallen in the cockpit. Loose items such as sunglasses, jewellery and hats are also risks being carried out. These types of loose items roaming throughout the flight deck and cabin area can pose much greater hazards including interfering with flight controls (e.g. jamming pedals or limiting other flight control authority) which could ultimately result in an aircraft accident and loss of life.
Pilot fatigue (SI-8016) (Amended)
This safety issue relates to flight crew tiredness in relation to the duration of the flight or length of the duty, the quality of sleep, exposure towards whole-body vibration (WBV) and noise, degrading performance and contributing to an unsafe outcome. It also includes non-compliance with the approved FTL scheme, or an FTL scheme not fit for purpose.

Poor operational management at take-off and landing sites (SI-8034) (Amended)
This safety issue relates to poor or inadequate operational management at take-off and landing sites, including aerodromes, heliports, helidecks, and any other urban or natural sites. It includes the management of vehicles, persons, obstacles, the training of ground operations personnel as well as the selection of a suitable landing site.

Poor pre-flight planning and preparation (SI-8017)
This safety issue relates to the inability to carry-out appropriate pre-flight planning due to pilot insufficient knowledge and/or lack of planning resources and information. It includes, in particular, the planning of the weather conditions, navigation, fuel, weight and balance, aircraft performance, and risk assessment for the planned flight.

Unanticipated yaw/loss of tail rotor effectiveness (SI-8024)
This safety issue relates to the inability to detect, control and recover from an unanticipated yaw or a loss of tail rotor effectiveness (LTE) during low-speed phases of flight, leading to the helicopter loss of control.

Unruly passengers (SI-8042)
This safety issue relates to passengers who, during commercial or private flights, do not respect or follow safety procedures, or cause disturbance to the flight crew. It also includes passengers overriding or pressuring professionals. The lack of adequate passenger pre-flight briefing is also addressed within this safety issue.

Vortex ring state (SI-8025)
This safety issue relates to the inability to detect, control and recover from an inadvertent VRS condition in flight, leading to the helicopter loss of control.
6. Non-commercial operations — small aeroplanes — NCO SA

The Non-commercial operations — small aeroplanes (NCO SA) Safety Risk Portfolio was first developed in 2016 by the Agency, in conjunction with the General Aviation CAG, and has since been reviewed annually. Each safety issue contributes to one or more key risk areas as defined in the Introduction of this Volume.

Regarding the main key risk areas for this domain, refer to the EASA ASR 2023 Section 2.6 Non-commercially operated small aeroplanes Figure 2.34 ‘KRAs by aggregated ERCS score and number of risk-scored occurrences, involving non-commercial other than complex aeroplanes’. These key risk areas are defined by their potential accident outcome and by the immediate precursors of that accident outcome. This figure is obtained by aggregating the ERCS score for the risk-scored occurrences relevant to this domain and plotting it against the number of risk-scored occurrences. The highest key risk area that is contributed by safety issues in the portfolio is Aircraft Upset. In Chapter 4 of Appendix 2 to the Annual Safety Review a more detailed link between safety issues and key risk areas can be observed.

The safety issues in the portfolio are sorted into the ‘Assess – Elevated priority index’, ‘Assess – Normal-to-low priority index’, ‘Mitigate – define’, ‘Mitigate – implement’, and ‘Monitor’ categories, which provide a snapshot of their status within the European SRM process by priority. The safety issue prioritisation method is described in the Introduction of this Volume. To understand each safety issue better, please click on the safety issue in the list to access their description.

Since the last edition, 1 new safety issue has been added (SI-4030), and 2 amended, after a discussion and review with the Agency’s internal experts. With the first edition of the Airworthiness Safety Risk Portfolio published this year, the safety issue SI-4018 ‘Maintenance of GA aeroplanes’ was identified as suitable for transfer to the airworthiness domain, but eventually not included. Maintenance is addressed by the Airworthiness Safety Risk Portfolio (as design and production, including organisations thereof). The scope of the safety issues is however defined at a lower level of granularity, so that meaningful and actionable safety issues related to maintenance are identified within the frame of that portfolio.

The highest SIPI score safety issues in the portfolio are ‘Risks associated with parachute operations’ (SI-4023) and ‘Airborne conflict’ (SI-4010). Both issues are in the MITIGATE bucket. In comparison with the previous edition, 3 safety issues are considered to be affected by the climate change.

The safety issue assessments were completed for the ‘Approach path management on GA aeroplanes’ (SI-4005). This assessment will now enter the BIS stage of impact assessment.

- **List 6-1**: Non-commercial operations — small aeroplanes safety issues per category & priority

<table>
<thead>
<tr>
<th>Assess – Elevated priority index</th>
<th>Facilitates Step 2: Assessment of safety issue</th>
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<tbody>
<tr>
<td>Poor pre-flight planning and preparation (SI-4007)</td>
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<tr>
<th>Assess – Normal-to-low priority index</th>
<th>Facilitates Step 2: Assessment of safety issue</th>
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<tbody>
<tr>
<td>Inadvertent flight into IMC/scud running (SI-4008) (Amended)</td>
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<tr>
<td>Inappropriate control input (SI-4029)</td>
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<tr>
<td>In-flight decision-making (SI-4003) (Amended)</td>
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<tr>
<td>Training, experience, and competence of individual (SI-4004)</td>
<td></td>
</tr>
<tr>
<td>Approach path management on GA aeroplanes (SI-4005)</td>
<td></td>
</tr>
</tbody>
</table>
Mitigate – define

- Handling of technical failures (SI-4001)
- Risks associated with parachuting operations (SI-4023)

**Facilitates Step 3: Definition and programming of safety actions**

Mitigate – implement

- Airborne separation (SI-4010)

**Facilitates Step 4: Implementation and follow-up of safety actions**

Monitor

- Fuel management in flight (SI-4011)
- Engine system reliability (SI-4012)
- Bird and wildlife strikes at smaller aerodromes/airfields (SI-4013)
- Mass and balance (SI-4014)
- Carbon monoxide poisoning (SI-4030) (New)
- Crosswind (SI-4015)
- Knowledge of aircraft systems and procedures (SI-4017)
- Damage tolerance to UAS collisions (SI-4019) (Amended)
- Operational communication (SI-4021)
- Icing in flight (SI-0001)
- Other aircraft system reliability (SI-4028)

**Facilitates Step 5: Safety performance measurement**

**Airborne separation (SI-4010)**

Maintaining airborne separation is one of the key contributory factors in reducing mid-air collision risk. This relies on the pilot’s ability to detect and avoid loss of separation and maintain safe distance between the aircraft and the surrounding traffic. This involves the adherence to separation minima and visual separation. This safety issue is also relevant for CAT A (SI-0043) and ATM/ANS (SI-2030) domains.

**Approach path management on GA aeroplanes (SI-4005)**

This safety issue addresses the inappropriate execution of an approach at any point from the IAF until reaching safe taxiing speed after landing. This can lead to runway excursions, aircraft upset, terrain collision, or airborne collision. It covers all types of instrumental and visual approaches. The following areas are reviewed in this safety issue:

- Management of the energy of the aircraft and the influence of external factors affecting the approach, such as tail or crosswind, windshear, down/up drafts and other weather-related factors;
- Decision-making process of the flight crew to go around or continue with the approach; and
- SOPs and the relevance of those procedures for the approach flown, pilot training and the existing regulatory framework.

The main objectives are to train pilots to achieve stabilised approaches on correct speeds, enhance pilots’ go-around decisions when the approach is unstable and the deployment of PBN approaches.
Bird and wildlife strikes at smaller aerodromes/airfields (SI-4013)
This safety issue considers the following contributory factors:

- Pilot’s ability/inability to detect, recognise and avoid bird strike or wildlife strike;
- ATC’s ability/inability to report the likelihood of bird strikes or wildlife strikes; and
- Aerodrome operator’s ability/inability to control the population of birds and other wildlife in the vicinity of the airport.

For pilots experiencing a bird strike or a wildlife strike, the main goal is to enable them to manage the startle effect and control the aircraft correctly to achieve a safe landing.

Carbon monoxide poisoning (SI-4030) (New)
Carbon monoxide (CO) poisoning occurs mostly due to cracks in exhaust systems. Air conditioning systems in small aircraft often lead cold air around the exhaust pipes to heat it before it enters the cockpit. CO poisoning can result in crew incapacitation and death.

Crosswind (SI-4015) (CC effect)
Crosswind conditions increase the complexity of a landing or take-off procedure as the pilot has to consider the crosswind conditions to avoid an aircraft upset or runway excursion. It includes the preparation of the approach and landing and the take-off, and the information received on crosswind, either from external sources or from the aircraft systems. It also includes the certified capabilities of the aircraft type to perform the landing in crosswind conditions (limitations), the SOPs and training of the pilot. It also includes the accuracy of the measurement of the wind conditions and the relay of that information to the pilot prior to landing or take-off.

The ‘Turbulence’ safety issue (SI-4016) is transposed into the ‘Crosswind’ safety issue as many of the turbulence incidents occurred during the take-off or approach/landing phases of the flight.

Damage tolerance to UAS collisions (SI-4019) (Amended)
UAS are a growing airborne conflict threat to manned aircraft due to their growing popularity among the public who may not be aware of their obligations under the UAS regulations. It is important to consider the structural tolerance of a general aviation aircraft to withstand impact with UAS and their ability to maintain controllability to enable a safe landing after a collision with an UAS. The damage tolerance has a direct relationship with the weight and size of the UAS, but also with the design of the UAS. The vulnerability of aircraft differs depending on the category of aircraft: Large aeroplanes (CS-25), small rotorcraft (CS-27) large rotorcraft (CS-29) and Normal, Utility, Aerobatic and Commuter Aeroplanes (CS-23). The latest research results from EPAS Action, RES.0015 on the “Vulnerability of manned aircraft to drone strikes” will now be analysed.

Engine system reliability (SI-4012)
The reliability and handling of any hardware/software system on board the aeroplane is crucial for a safe flight. This issue is focused on the engine and its operation. Failure of any of these hardware/software systems can result in loss of power, leading to loss of control while the pilot is trying to solve the problem.

Fuel management in flight (SI-4011)
This safety issue includes the fuel planning, calculation, and the management once the flight has started. Examples are pre-flight visual fuel quantity inspections including test for water in the fuel, correct mixture leaning during the flight, correct use of fuel valves, pumps, and switches. Fuel management is important to ensure that there is sufficient fuel for the flight or different legs of the flight. Poor fuel management may result in high workload and stress for the flight crew as they have to look for alternate aerodromes/airfields to land at a short notice.
Handling of technical failures (SI-4001)

Pilots may suffer from non-catastrophic technical failure(s) in the aircraft systems from time to time. It is important for the pilot to have the ability and capability to manage such failures to avoid an aircraft upset. This includes, for example, handling of engine failures, flight control problems as well as failures in navigation systems. Occurrence data shows that the pilot’s focus is often fixed on resolving the technical issue instead of flying the aircraft towards the safest landing site. This often results in loss of control and, potentially, fatal accidents.

Icing in flight (SI-0001) (CC effect)

Icing in flight may occur due to various reasons; however, this safety issue is focused on the manifestation of icing during flight caused by an atmospheric icing phenomenon. The typical manifestation is the accretion of ice on aerodynamic surfaces, probes, engine parts or flight control system, leading to degradation of handling quality or performance issues, system failures or malfunctions, or damages on the aeroplane’s structure. When such icing occurs, it is important to ensure that the pilot is able to recognise and manage the flight in adverse icing conditions. Aircraft specifically with carburettors are most prone to engine icing in flight. Proposed mitigations include the promotion of knowledge on icing conditions and how to handle the aircraft when icing occurs. This safety issue is captured in the Commercial air transport — aeroplanes Safety Risk Portfolio.

Inadvertent flight into IMC/scud running (CC effect) (SI-4008) (Amended)

A poorly executed planned low-altitude flight may result in the aircraft’s collision with objects or surface. This includes also what is called ‘scud running’ where the pilot flies under low clouds close to the ground to reach their planned destination. This also captures ‘press-on-it’ mentality during a VFR flight where pilots put themselves into unnecessary danger trying to reach their destination.

Inappropriate control input (SI-4029)

Included in this safety issue are occurrences where inappropriate control input by the pilot was evident in the occurrence.

Inflight decision making (SI-4003)

To effectively respond to dynamic situations or changes during the flight, the pilot needs to possess the ability to correctly gather information and re-plan in flight. This includes decisions involving navigational matters, problem-solving and avoiding or recovering from low- or no-visibility conditions. This is exacerbated by social and commercial pressures (e.g., pressure from the passenger) to reach the planned destination, pushing the pilot to take unnecessary risks, instead of turning around and try another time. A wrong decision based on incorrect evaluation of the circumstances has caused fatal accidents. Proposed actions are to provide/promote education in the use of available information to enhance the decision-making process. This includes increasing the availability of information and simplifying the presentation of this information to the pilot to facilitate understanding.

Knowledge of aircraft systems and procedures (SI-4017)

This issue refers to the pilot’s ability/inability to apply formerly acquired knowledge and training to the current event. This is evident when pilots fly aircraft that they do not have much experience on – i.e. transitional training has not been or inadequately performed resulting in incorrect actions causing even cascade of other problems and inadequate decision-making. It is important for pilots to understand the characteristics of the different systems on board the aircraft. Pilots who are proficient in their knowledge of systems should instinctively use the correct systems; otherwise, they may lose precious time in searching for the correct systems or use the wrong system.
Mass and balance (SI-4014)
The mass and balance of the aircraft may be adversely affected by inadequate or incorrect loading of the aircraft by the pilot. GA pilots usually load their aircraft by themselves and do not use ground handling services. The objective is to improve the calculation of load and balance sheets and ensure that the baggage and cargo are securely fastened to prevent them from shifting and changing the aircraft’s centre of gravity.

Operational communication (SI-4021)
Ineffective communication, including language proficiency (all languages), use of standard terminology, hand signals, visual communication, distraction from outer sources (e.g. mobile phones) are all factors that may lead to unsafe situations in the airside operational environment. In a well-functioning operational environment, individuals have the necessary skills to communicate effectively.

Other aircraft system reliability (SI-4028)
This issue refers to the reliability of all aircraft systems, other than the engine and propeller.

Risks associated with parachuting operations (SI-4023)
Parachuting operations are flights which are specifically chartered/operated to transport parachutists (called ‘skydivers’ in sport parachuting) to a designated altitude for jumping out from the aircraft. These operations, usually entailing short flights, are exposed to a range of operational hazards that may relate to changes in weight and balance, possible interference of the parachute deployment devices with structural elements of the aircraft upon exit, insufficient communication between the pilot and the parachutists, non-adherence to SOPs leading to convergent aircraft descent- and free-falling parachutist trajectories (a risk in particular in the case of wing suit or large formation skydiving), etc. This type of operation may also be exposed to organisational hazards such as commercial pressure, lack of or inadequate safety briefings, inadequate monitoring of continuing airworthiness.

Poor pre-flight planning and preparation (SI-4007)
Effective pre-flight planning and preparation is achieved by ensuring that the correct processes, tools, and information are used by the flight crew/operator to plan the flight. It includes the adequacy, accuracy and timeliness of the information used, how this is processed and digested by the flight crew, and their training and procedures. It includes the flight preparation steps before the flight is initiated.

Training, experience, and competence of individuals (SI-4004)
This safety issue relates to the pilot’s training, experience, and competence to handle the required tasks in flying the aircraft from engine start-up till engine shutdown, as well as their ability to address occurrences they may face during the flight. This issue also addresses training aspects and planning within training organisations.
# 7. Sailplanes — SP (New)

The sailplane portfolio appears now for the first time in the EPAS. The safety issues have been identified from various sources as per the EU SRM process. The European Gliding Union (EGU) provided valuable input in its initial stages. The portfolio has since then been maintained and reviewed by EASA experts.

The highest key risk area that is contributed by safety issues in the portfolio is aircraft upset. Refer to the Appendix 5 to the Annual Safety Review for more detailed link between safety issues and key risk areas.

The highest SIPI score safety issues in the portfolio are ‘Aircraft separation’ (SI-7005), ‘In-flight decision-making’ (SI-7004) and ‘Training, experience, and competence of individuals’ (SI-7008).

The safety issue assessment for SI-7002 is expected to be conducted in 2024 and safety promotion is planned in relation to SI-7017 as rigging issues have occurred — especially on older sailplanes.

<table>
<thead>
<tr>
<th>List 7-1: Sailplane operations — sailplane safety issues per category &amp; priority</th>
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<tbody>
<tr>
<td><strong>Assess – Elevated priority index</strong></td>
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<tr>
<td>None</td>
</tr>
<tr>
<td><strong>Assess – Normal-to-low priority index</strong></td>
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<tr>
<td>• Winch launch failures (SI-7002) (New)</td>
</tr>
<tr>
<td><strong>Mitigate – define</strong></td>
</tr>
<tr>
<td>None</td>
</tr>
<tr>
<td><strong>Mitigate – implement</strong></td>
</tr>
<tr>
<td>• Airborne separation (SI-7005) (New)</td>
</tr>
<tr>
<td><strong>Monitor</strong></td>
</tr>
<tr>
<td>• In-flight decision-making (SI-7004) (New)</td>
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<tr>
<td>• Aerotow (SI-7007) (New)</td>
</tr>
<tr>
<td>• Training, experience, and competence of individuals (SI-7008) (New)</td>
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<tr>
<td>• High wind encounter (SI-7013) (New)</td>
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<tr>
<td>• Approach path management on sailplanes (SI-7006) (New)</td>
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<tr>
<td>• Inappropriate flight control inputs on sailplanes (SI-7006) (New)</td>
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<tr>
<td>• Under/overshoot (SI-7012) (New)</td>
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<tr>
<td>• Glider integrity (SI-7017) (New)</td>
</tr>
<tr>
<td>• Off-field landings (SI-7011) (New)</td>
</tr>
<tr>
<td>• Medical (SI-7001) (New)</td>
</tr>
<tr>
<td>• Landing on airfield (SI-7014) (New)</td>
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</table>
**Aerotow (SI-7007) (New)**

The safety issue addresses the aerotow process, how it is taught and trained and captures occurrences related to aerotowing like, glider too high or too low compared with the towing aircraft, which can cause loss of control, and tow cable release issues.

**Airborne separation (SI-7005) (New)**

Even though the gliders are flying close to each other due to thermal climbing or other activities, they come uncomfortably close to each other or collide with each other. This issue also involves collisions or near collisions with other type of aircraft in all types of airspaces. That part of the issue is also covered by SI-4010 in the NCO portfolio.

**Approach path management on sailplanes (SI-7006) (New)**

This safety issue is related to the inappropriate execution of an approach at any point during the approach until reaching safe landing. This can lead to runway excursions, aircraft upset, terrain collision or airborne collision. It covers visual approaches. The following areas are reviewed in this safety issue:

- Management of the gliding energy of the aircraft and the influence of external factors affecting the approach, such as tail or crosswind, windshear, down/up drafts, and other weather-related factors.
- Decision-making process of the pilot to deviate from the normal pattern, choose an alternate landing location or continue with the approach; and
- Procedures and checklists for the flown approach, pilot training and the existing regulatory framework.

The main objectives of this safety issue are to train pilots to achieve stabilised approaches on correct speeds, and enhance pilot’s decisions when the approach is unstable.

**Glider integrity (SI-7017) (New)**

This safety issue includes an incorrect assembly, or rigging, of sailplanes during flight preparation. The issue includes the incorrect insertion of the main wing bolt(s) and connection of control surfaces.

**High wind encounter (CC effect) (SI-7013) (New)**

It is the encounter of high wind, including crosswind and gust conditions during the landing or the take-off. It includes the preparation and precautions to be taken for the approach and landing and the take-off, and the information received on weather phenomena, either from external sources or from the aircraft systems. It also includes the certified capabilities of the aircraft type to perform the landing in strong wind conditions, the SOPs and training of the pilot. It also includes the accuracy of the perception of the wind of the pilot performing the approach.

**Inappropriate flight control inputs (SI-7016) (New)**

This safety issue includes occurrences where wrong or inadequate flight control inputs by the pilot or passenger are the cause of the occurrence.

**Inflight decision making (SI-7004) (SI-4003) (New)**

To effectively respond to dynamic situations or changes during the flight, the pilot needs to possess the ability to correctly gather information and re-plan in flight. This includes decisions involving navigational matters, problem-solving and/or avoiding or recovering from weather-related incidents. This is exacerbated by social and pier pressures pushing the pilot to take unnecessary risk, instead of turning around, deviate to another airfield or perform a safe out landing, and try another time. A wrong decision based on incorrect evaluation
of the circumstances has caused fatal accidents. Proposed actions are to provide/promote education in the use of available information to enhance the decision-making process. This includes increasing the availability of information and simplifying the presentation of this information to the pilot to facilitate understanding.

**Landing on airfields (SI-7014) (New)**
This issue tracks landings on airfields. Occurrences often result in collision damages and runway excursions causing substantial damage to the aircraft.

**Medical (SI-7001) (New)**
Lack of oxygen and other events leading to incapacitation of the person on board the aircraft. Medical conditions like heart attack or stroke cannot be predicted and are not included in this issue.

**Off-field landings (SI-7011) (New)**
This issue tracks off-field landings which are quite common while gliding; however, it is also quite common for gliders to hit objects during the landing causing substantial damage to the aircraft.

**Training, experience, and competence of individuals (SI-7008) (New)**
This safety issue relates to the pilot’s training, experience, and competence to handle the required tasks in flying the aircraft from launch until landing, as well as their ability to address occurrences they may face during the flight. This issue also addresses training aspects and planning within training organisations.

**Under/overshoot (SI-7012) (New)**
The fact that sailplanes do not normally have an engine and cannot abort the landing and perform a go-around, the likelihood of overshooting or undershooting the landing area is higher than with powered aircraft.

**Winch launch failures (SI-7002) (New)**
The pilot’s ability/inability to cope with interruptions of the winch launch procedure. This also includes cable break (simulated or reality) and wing drop during take-off and includes failures of the winch system.
8. Balloons — BA (New)

This is the first time that the Balloon Safety Risk Portfolio is published in EPAS. The work of the Balloon CAG established the first version of the portfolio, but since then it has been managed and reviewed by EASA experts.

The highest key risk area that is contributed by safety issues in the portfolio is aircraft upset. The most common occurrences for aircraft upset in balloons relate to persons being ejected from the basket due to a hard landing, causing loss of control. Refer to Appendix 4 to the Annual Safety Review for a more detailed link between safety issues and key risk areas.

The highest SIPI score safety issue in the portfolio is SI-6003 ‘Pressure to fly’. Two safety issues are affected by the climate change.

No safety issue assessments have been started for safety issues.

**List 8-1: Balloon operations — balloon safety issues per category & priority**

**Assess – Elevated priority index**

- Pressure to fly (SI-6003) (New)  
  Facilitates Step 2: Assessment of safety issue

**Assess – Normal-to-low priority index**

- Collision with building and trees (SI-6006) (New)  
  Facilitates Step 2: Assessment of safety issue
- Powerline collisions (SI-6001) (New)  
  Facilitates Step 2: Assessment of safety issue
- Presence and use of pilot restraints (SI-6002) (New)  
  Facilitates Step 2: Assessment of safety issue

**Mitigate – define**

None  
Facilitates Step 3: Definition and programming of safety actions

**Mitigate – implement**

None  
Facilitates Step 4: Implementation and follow-up of safety actions

**Monitor**

- Control of flight path and inertia (SI-6007) (New)  
  Facilitates Step 5: Safety performance measurement

**Collision with buildings and trees (SI-6006) (New)**

During low flying, take-off or landing of a balloon, various circumstances can come up that can block the pilot’s view or perception of his surroundings causing a collision with trees or buildings.

**Control of flight path and inertia (SI-6007) (New)**

The pilot’s understanding of the balloon characteristics. The balloon size affects the inertia of the balloon i.e. how fast the balloon climbs or descends and the time it takes e.g. to reverse from decent to climb. The time varies with the balloon size, i.e. the volume of hot air within the balloon. Correctly directing the flight towards
the planned destination and deciding whether to descend or climb in proximity of obstacles are crucial aspects of ballooning.

**Powerline collisions (SI-6001) (New)**

The pilot’s awareness or ability/inability to correctly gather information, perform a safe flight and replan effectively in dynamic situations. This includes decisions during flight involving navigational matters, problem-solving and what to do when entering distracting situations or low-/or no-visibility conditions.

**Presence and use of pilot restraints (SI-6002) (New)**

Pilots not using restraints during a balloon flight prevents them from being ejected from the basket during landing.

**Pressure to fly (SI-6003) (New)**

Balloon pilots are under greater pressure to fly than other pilots as they do not get paid unless they fly. Organisational pressure and pressure due to critical weather can cause hazardous situations when flying under pressure in a commercial operational setting.
9. Airworthiness (New)

While existing product-related Safety Risk Portfolios, such as commercial air transport aeroplanes or rotorcraft, may have collected safety issues adversely affecting initial and continued airworthiness of the type design (including operational suitability data (OSD)), continuing airworthiness, and/or associated organisations/competent authorities (i.e. design, production, continuing airworthiness management, maintenance), they were essentially flight-operations-centric.

An Airworthiness Safety Risk Portfolio was, therefore, developed in 2023 by the Agency to focus on safety issues related to airworthiness and environmental certification, and continuing airworthiness. Integrating the lessons learnt from the B737 MAX accidents in the European SRM process and centralising airworthiness-related safety issues in one place, were instrumental in the decision to establish that portfolio.

Safety issues of interest for the airworthiness portfolio are defined where:

- they adversely affect more than one product type or part, more than one organisation, and/or more than one competent authority;
- they would need to be controlled by other means than selective and reactive mitigating controls, such as airworthiness directives (ADs), safety directives (SDs), or inspection/standardisation findings;
- they are framed to scenarios mainly controlled by design, production, maintenance, continuing airworthiness management organisations, and their competent authorities.

The first edition of the Airworthiness Safety Risk Portfolio is published as part of this revision of EPAS Volume III.

Safety issues that were transferred from an existing Safety Risk Portfolio (e.g. Rotorcraft) to the Airworthiness Safety Risk Portfolio are identified as ‘Transferred’ with their former safety issue ID in addition to the new airworthiness safety issue ID. Unless the safety issue is categorised ‘(Amended)’, the title and/or description were not modified compared with the last revision of EPAS Volume III.

Safety issues that were eligible for transfer from an existing Safety Risk Portfolio to the Airworthiness Safety Risk Portfolio but eventually not included in the portfolio are justified in the section applicable to the existing Safety Risk Portfolio.

> List 9-1: Airworthiness safety issues per category & priority

Assess – Elevated priority index  
Facilitates Step 2: Assessment of safety issue
- Insufficient consideration of flight crew human factors in the continued airworthiness process of the type design (SI-9003) (New)
- Inadequate aircraft design resulting in maintenance errors (SI-9006) (Transferred SI-3017)
- Outdated certification bases established for major changes to type certificates (SI-9005) (New)

Assess – Normal-to-low priority index  
Facilitates Step 2: Assessment of safety issue
- Inadequate management of repetitive defects (SI-9001) (Transferred SI-0050)
- Limited application and inadequate oversight of development assurance (SI-9004) (New)
- Use of airstair for passenger embarking/disembarking on large transport aeroplanes (SI-9008) (New)

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Mitigate – define

*Facilitates Step 3: Definition and programming of safety actions*

NIL

Mitigate – implement

*Facilitates Step 4: Implementation and follow-up of safety actions*

- Helicopter rotor and transmission system failures (SI-9007) (Transferred SI-8001)
- Hazardous conditions following helicopter ditching (SI-9009) (Transferred SI-8039)

Monitor

*Facilitates Step 5: Safety performance measurement*

- Insufficient consideration of flight crew human factors in functional hazard assessments (SI-9002) (New)
- ADELTs, ELTs and PLBs malfunctions (SI-9010) (Transferred SI-8043)

**ADELTs, ELTs and PLBs malfunctions (SI-9010) (Transferred SI-8043)**

This issue refers to failures and malfunctions of automatically deployable emergency locator transmitters (ADELTs), emergency locator transmitters (ELTs) and personal locator beacons (PLBs). It includes, in particular, the cases when these systems do not perform as required after impact, or when there is an unintentional deployment or activation of these systems. The failure of activation of these systems can increase the risk of post-impact fatalities.

**Hazardous conditions following helicopter ditching (SI-9009) (Transferred SI-8039)**

This safety issue includes all hazards endangering the survivability of the helicopter occupants after a ditching has been performed. In addition to the helicopter emergency floatation system (EFS) malfunctions, it includes the hazards related to an evacuation after a helicopter capsizing such as issues with the emergency exit suitability, signage, the internal and external emergency lighting, the life raft deployment from the cabin or externally, defective or unsuitable survival suits, the inadequate crew and passenger training for underwater escape and the use emergency and safety equipment such as life jackets and emergency breathing systems.

**Helicopter rotor and transmission system failures (SI-9007) (Transferred SI-8001)**

This safety issue relates to technical failures, malfunctions, and defects of the helicopter main rotor (ATA 62), main rotor drive system (ATA 63), tail rotor (ATA 64) and tail rotor drive system (ATA 65), contributing to an unsafe operational outcome.

**Inadequate aircraft design resulting in maintenance errors (SI-9006) (Transferred SI-3017)**

Maintenance-related occurrence reports collated by the UK CAA through the mandatory occurrence reporting scheme over the period from January 2005 to December 2011 for large aeroplanes (UK CAA CAP1367, 2016) showed that ‘installation error’ and the ‘use of approved data’ (rather the likely lack of it) were the most frequent types of errors. A considerable body of evidence on maintenance error has also been established lately, highlighting issues stemming from aircraft design (Royal Aeronautical Society, 2022).

The deeper systemic issue arises not from the individual performing maintenance activities but from the design approval holder that produced the design, e.g. poor accessibility/visibility, ambiguous or misleading maintenance instructions. A key contributing factor for both incorrect installation and failure to follow instructions is the lack of mistake-proofing or error mitigation in aircraft design. Errors can also exist in maintenance instructions, and lack of or insufficient verification can result in difficult-to-use maintenance instructions. In addition,
oversight activities indicate that ambiguous/unclear maintenance instructions are not systematically reported by maintenance organisations and/or by CAMOs to the design organisations.

Solely relying on warning/caution messages in maintenance instructions, markings, or independent inspections to detect maintenance errors, whereas the hazard can be eliminated by careful design, is not considered suitable. As an example, an incorrect assembly that looks right or is believed to function correctly to one maintenance person may equally look right/appear to function correctly to a second maintenance person during an independent inspection.

EASA and the FAA have clear regulation and guidance material in their continuing airworthiness regulations addressing the application of HF principles. Accidents and incidents arising from maintenance continue however to occur. Since maintainability can be designed in, specifying maintainability requirements early at the design stage of the aircraft system development is considered paramount in mitigating maintenance errors. Utilising a human-centred design approach will contribute to reducing the likelihood of maintenance errors and prevent further escalation into accidents or serious incidents. Maintenance errors not only affect safety of flight but also can be very costly to the air operators and organisations involved in continuing airworthiness.

**Inadequate management of repetitive defects (SI-9001) (Transferred SI-0050)**

This safety issue addresses repetitive defects of aircraft systems which may adversely affect aircraft operations and airworthiness if not managed properly.

Managing repetitive defects is multi-dimensional and requires collaboration between all stakeholders in the airworthiness domain, including operators, type certificate holders, continuing airworthiness management and maintenance organisations.

CAMOs hold the main responsibility to manage such defects. Their role, as prescribed by Regulation (EU) No 1321/2014, is to ensure the airworthiness of the aircraft and arrange the rectification of defects. Identification of repetitive defects is a challenge, as well as their technical assessment and resolution. The CAMO interfaces with all other involved organisations.

AMOs are tasked by the CAMOs to perform the necessary maintenance resulting from the aircraft maintenance programme (AMP) or from defect identification. Reporting information from AMO to CAMO may be essential in the management of repetitive defects.

Aircraft operators and flight crews operate the aircraft and are exposed to defects. The flight crew is expected to report them through the aircraft technical log to inform the CAMO. On the other hand, the CAMO should ensure that the flight crew has all information necessary to perform the flight, which may include informing the flight crew of specific defects that could occur in a repetitive manner.

Design approval holders (DAHs) are responsible for the design of the aircraft. Once informed by the CAMO, they should support the investigation with a view to solving the issue and/or proposing mitigating actions.

Repetitive defects can be difficult to detect and have the potential to remain latent over long periods of time, with the risk to affect the safe operation of aircraft, particularly if combined with other defects. Besides, the management of repetitive defects involves multiple activities including continuing airworthiness management, aircraft maintenance, flight operations and design. This translates into additional challenges, such as information sharing, communication or interpretation issues, which can ultimately impact how well repetitive defects are managed and hence potentially threaten flight safety. There have been cases where repetitive defects were identified as contributing factors to fatal accidents of large aeroplanes in commercial air transport.
Insufficient consideration of flight crew human factors in functional hazard assessments (SI-9002) (New)

Functional hazard assessments (FHAs) are key elements within the safety assessment process for showing compliance with CS 25.1309. They support the compliance demonstration by ensuring that:

- the identification of failure conditions is complete;
- the classification of failure conditions is correct and adequately substantiated.

The consequences of failure conditions and the severity thereof may be mitigated by relying on flight crew actions. Whether these mitigations are valid directly affects the classification and subsequently the safety objectives.

Recent experience has shown that a disparity may exist between:

- the observed flight crew behaviours; and
- the underlying assumptions about flight crew recognition, interpretation, and response that applicants have made during the design certification process.

These discrepancies have resulted in a number of safety recommendations. While guidance on 25.1302 clearly states that both normal and non-normal conditions have to be covered, there is no guidance material defining a structured HF methodology for validation of the FHA assumptions with respect to flight crew behaviour.

Insufficient consideration of flight crew human factors in the continued airworthiness process of the type design (SI-9003) (New)

During the design phase of the human/machine interface in the flight deck, the type certificate applicant must demonstrate compliance with the HF requirements, anticipating potential in-service events related to HP and implementing design-related mitigations. The type certificate applicant must therefore ensure that the design of the flight deck considers a comprehensive set of design principles that are very close to what is well described in the literature under the concept of usability. The ultimate intent of designing a usable flight deck is to prevent as much as practicable any kind of HP issues in both normal and abnormal situations (including failure conditions), and to allow the management thereof should they occur.

Experience has shown that, despite the best efforts made during the initial airworthiness process of the type design, actual flight crew behaviour or performance in service may deviate from what was initially expected by the DAHs and the certification authorities. Such deviations in both normal and abnormal situations (including failure conditions) may have safety consequences and result in serious incidents/accidents if going further unnoticed.

DAHs and certification authorities normally rely on the continued airworthiness process of the type design to further capture and manage design weaknesses, assumptions invalid over time, etc. In such a context, it is therefore paramount that air operators systematically report to the DAHs occurrences involving HP aspects detected by the flight crew during the operator’s flight operations and/or detected by the instructor during the operator’s simulator training. It is equally paramount that the DAHs investigate these occurrences and are able to determine potential unsafe conditions originated from HP issues.

The existing regulatory material for occurrence reporting and continued airworthiness of the type design does not however fully address these key elements when it comes to HP.

Limited application and inadequate oversight of development assurance (SI-9004) (New)

Showing compliance with system-safety-related certification specifications requires addressing development errors (i.e. errors in requirements, design or implementation). Development assurance activities are the means to minimise the likelihood of development errors made within the development life cycle of the aircraft, systems
and equipment. These activities are implemented by applicants through development assurance plans and processes at aircraft and system levels, the acceptability of which is assessed by the Agency against the objectives contained in SAE ARP 4754A/Eurocae ED-79A ‘Guidelines for Development of Civil Aircraft and Systems’.

Recent experience has shown however that while applicants understand the development assurance process and underlying activities, they do not always consider that development assurance directly contributes to aircraft/system safety. Analysis of occurrences, reports from safety investigation authorities, and certification reviews draw attention to:

- limited scope of applicability (exacerbated by the change product rule, ref. SI-9005);
- loose application of the process;
- low level of oversight from the applicant itself and authorities; and/or
- compliance artefacts almost inexistent or of poor quality.

**Outdated certification bases established for major changes to type certificates (SI-9005) (New)**

When defining the applicable certification basis for a major change to a type certificate, the regulation introduces flexibility under conditions for selecting an earlier amendment of a certification specification instead of the amendment in effect on the date of application for the change.

Experience has shown that the use of this flexibility can sometimes be extensive. It may involve, for instance, artificially reducing the scope of significant changes and related changes with preceding and/or succeeding sets of non-significant major changes. It may also entail applying the exception conditions at equipment/component level while the use of the equipment/component by other systems at aircraft level is significantly changed. This extensive use may eventually impair the initial intent of the regulation that introduces this flexibility (ref. requirement 21.A.101 of Part 21 known as the change product rule). As indicated in the related guidance material (GM 21.A.101), the intent of the change product rule is to enhance safety by incorporating to the greatest extent practicable the latest requirements into the certification basis for the changed product.

Besides, it is recognised that the change product rule brings along its inherent complexity, involving different options, steps and concepts which are sometimes open to different interpretations and to negotiations. Its application on nowadays products is complex, either because of the ever-higher integration of systems (and of systems and structure), or because of the increase in process-based/aircraft level requirements (HF, system safety, development assurance, security, cybersecurity, etc.). The output of the process, the certification basis, is equally getting more and more complex and less and less intelligible. This complexity has the tendency to distract the authority and applicant resources and move their focus away from design safety.

**Use of airstair for passenger embarking/dismounting on large transport aeroplanes (SI-9008) (New)**

An airstair is an integrated and retractable stair installed on the aeroplane at one exit so that passengers may board and alight the aeroplane. It eliminates the need for additional ground support equipment such as a mobile stairway or jetway, for passengers to board or exit the aeroplane.

While airstairs are certified as part of the aircraft design and have been approved for installation on multiple large aeroplanes, the applicable certification requirements do not explicitly address the expected level of safety in the case of use for embarking/dismounting passengers. Note that mobile stairs provided by handling agents at airports are required to meet minimum design standards including stair width and side barriers of a minimum height. As mentioned by recommendation 48 in the research project EASA.2008.C18 on CS-25 cabin safety requirements published in 2009, there are no regulations governing the height, angle or slip resistance of the steps, or the provision of handrails for airstairs. Back in 2007, following four occurrences of personal injury resulting from small children falling through or over the airstair handrails, the FAA published Special

11 For instance, BS EN 12312-1:2013 Aircraft ground support equipment: specific requirements - part 1: passenger stairs.
Airworthiness Information Bulletin (SAIB) NM-07-47 to owners and operators of 737 series airplanes equipped with forward airstairs, in order to recommend the incorporation of service bulletins, adding warning placards to the risers on the airstair steps and door jams, as well as anti-skid material to the side beams and top stair of the airstairs. The warning placards advised to hold a child’s hand while they are on the airstairs. Boeing had also revised the flight attendant manual advising to pay particular attention to persons with small children or those with special needs.

Occurrence data over 2018-2022 for commercial air transport of passengers on large aeroplanes showed an adverse trend in the number of occurrences where passengers sustained injuries when embarking/disembarking the aeroplane. A common element in these occurrences was the use of airstair by the passengers, as opposed to the use of other airport/aircraft support ground equipment for embarking/disembarking.
10. Air traffic management/air navigation services — ATM/ANS

The ATM/ANS Safety Risk Portfolio was first developed in 2017 by the Agency, in conjunction with the ATM/ANS CAG and has since been reviewed annually. Each safety issue contributes to one or more key risk areas as defined in the Introduction of this Volume.

Regarding the main key risk areas for this domain, refer to the EASA ASR 2021 Chapter 7 ATM/ANS Figure 7.7 ‘Key risk areas by aggregated ERCS score and number of risk-scored ATM/ANS occurrences. These key risk areas are defined by their potential accident outcome and by the immediate precursors of that accident outcome. This figure is obtained by aggregating the ERCS score for the risk-scored occurrences relevant to this domain and plotting it against the number of risk-scored occurrences. The risk picture of this domain identifies the key risk areas of greater concern that are airborne collision, runway excursion, and aircraft upset.

The safety issues in the portfolio are sorted into the ‘Assess – Elevated priority index’, ‘Assess – Normal-to-low priority index’, ‘Mitigate – define’, ‘Mitigate – implement’, and ‘Monitor’ categories, which provide a snapshot of their status within the European SRM process by priority. The safety issue prioritisation method is described in the Introduction of this Volume. To understand each safety issue better, please click on the safety issue in the list to access their description.

Since the last EPAS edition the titles of 2 safety issues have been amended.

The highest SIPC score safety issues in the portfolio are ‘Airborne conflict with an unmanned aircraft system’ (UAS) (SI-2014), ‘Undetected occupied runway’ (SI-2006) and ‘Mass diversions’ (SI-2032). In comparison with the previous edition, the safety issue of airborne conflict with UAS was raised to higher priority because certain infrastructure facilities are not in place and not all regulations are complete and implemented yet. 6 safety issues are affected by the climate change.

Refer to Appendix A for the link between safety issues and key risk areas.

The safety issue assessments were completed for SI-2003 ‘Inefficient conflict detection with closest aircraft’. This safety issue is now in the BIS stage for impact assessment of proposed mitigating actions.

List 10-1: ATM/ANS safety issues per category & priority

<table>
<thead>
<tr>
<th>Assess – Elevated priority index</th>
<th>Facilitates Step 2: Assessment of safety issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Airborne conflict with an unmanned aircraft system (UAS) (SI-2014) (Amended)</td>
<td></td>
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<tr>
<td>• Undetected occupied runway (SI-2006)</td>
<td></td>
</tr>
<tr>
<td>• Mass diversions (SI-2032) (CC effect)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assess – Normal-to-low priority index</th>
<th>Facilitates Step 2: Assessment of safety issue</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Level bust (SI-2004)</td>
<td></td>
</tr>
<tr>
<td>• High-energy runway conflict (SI-2005)</td>
<td></td>
</tr>
<tr>
<td>• Deconfliction with aircraft operating with a malfunctioning or non-operative transponder (SI-2002)</td>
<td></td>
</tr>
<tr>
<td>• Landing/take-off/crossing without clearance (SI-2007)</td>
<td></td>
</tr>
<tr>
<td>• Safety issues raising from new technologies and automation (e.g. remote tower, SWIM) (SI-2015)</td>
<td></td>
</tr>
</tbody>
</table>
10. AIR TRAFFIC MANAGEMENT/AIR NAVIGATION SERVICES — ATM/ANS

- Cybersecurity (SI-2013)
- Inaccurate provision of weather information (wind at low height) (SI-2009)
- Inaccurate provision of weather information (turbulence/windshear/convective weather) (SI-2008)
- Failure of air-ground communication service (SI-2018) (CC effect)
- Lack of understanding and monitoring system performance interdependencies (SI-2022)
- Airborne sector overload (SI-2019) (CC effect)
- Failure of surveillance service (SI-2017) (CC effect)
- Failure of navigation service (SI-2016) (CC effect)

**Mitigate – define**
Facilitates Step 3: Definition and programming of safety actions

- Inefficient conflict detection with the closest aircraft (SI-2003)
- Airspace infringement (SI-2025)

**Mitigate – implement**
Facilitates Step 4: Implementation and follow-up of safety actions

- Deconfliction of IFR and VFR traffic (SI-2030) (Amended)
- Lack of effectiveness of safety management system (SI-2026)
- ACAS RA not followed (SI-2001)

**Monitor**
Facilitates Step 5: Safety performance measurement

- Inadequate ATCO-pilot operational communication (SI-2027)
- Inadequate procedure design and obstacle publication (SI-2028)

**ACAS RA not followed (SI-2001)**

The ACAS is considered one of the last lines of defence in preventing an airborne collision. This safety issue pertains to the situations where the flight crew of one or both aircraft ignore the ACAS RA, react excessively late, do not follow the instruction regarding vertical rate precisely or respond in opposite direction. Flight crew are required to comply immediately with all resolution advisories (RAs), unless doing so would endanger the aircraft. Similarly, ATCOs are required not to provide further ATC instructions once the flight crew reports the RA. The appropriate responses which flight crew and ATCOs are expected to demonstrate in the event of an ACAS RA are outlined in ICAO and EU regulatory documentation.

**Airborne conflict with an unmanned aircraft system (UAS) (SI-2014) (Amended)**

The increasing popularity of drones, especially drones of less than 25 kg operating in the ‘open’ category, has inadvertently led to an increase of airborne collision risk between drones and manned aircraft. This is largely due to unauthorised activity of drones in both take-off and approach paths of commercial airlines up to 5 000 ft. While less common, unauthorised activity of drones may also pose a collision hazard when an aircraft is flying en route. Authorised UAS operations in the ‘specific’ category may include UAS flights at altitudes at which other (manned) aircraft will fly, and therefore these could possibly pose risks as well. For example, failure of the UAS guidance and control system or degradation of technical systems supporting e-identification, geo-fencing, detect and avoid, (self)-separation or collision avoidance, could increase the risk of airborne collision with a UAS. Also, HF issues and unintended remote pilot/operator errors could result in airspace violations, procedural deviations, and altitude deviations (thereby increasing the risk of airborne collision).
This safety issue is exacerbated by the fact that UAS are often not detected by ground equipment and/or on-board conspicuity devices of other aircraft.

As a result of a drone sighting, aerodrome traffic may be stopped or diverted, leading to secondary risks, such as fuel shortages, airspace capacity saturation and an increased workload of ATCOs and pilots.

**Airborne sector overload (SI-2019) (CC effect)**

Sector overload refers to a complex situation where the ATCO on operational duty can no longer manage the existing levels of air traffic in a safe manner. As ATCOs are personnel responsible for the safe, orderly and expeditious flow of air traffic, it is important to address any situation which impairs the controller’s ability to achieve the desired levels of safety. A complex situation may arise due to a confluence of external or internal factors. External factors include aircraft deviation from the planned trajectory, unexpected bad weather conditions, reduction of available airspace, amongst others. Internal factors include degradation of ATM system performance, parallel system maintenances, blocked runway, amongst others. When assessed individually, some of these contributory factors may have a minor impact on safety. However, when compounded, these factors may manifest in unsafe management of the traffic demand.

**Airspace infringement (SI-2025)**

Airspace infringement occurs when an aircraft enters notified airspace without previously requesting and obtaining clearance from the controlling authority of that airspace or enters the airspace under conditions that were not contained in the clearance. Such infringements pose a safety risk to traffic within the controlled airspace and increase the ATCOs’ workload. The safety issue addresses infringements by aircraft flying using VFR in controlled airspace (Class A to D), aircraft accessing airspace without ATC clearance, and infringements of restricted airspaces such as danger areas, restricted areas, prohibited areas and temporary segregated/reserved areas by all types of traffic.

**Cybersecurity (SI-2013)**

ATM systems have become increasingly digitalised to reap efficiency gains. However, a move towards the digital sphere exposes ATM systems to more vulnerabilities and threats to confidentiality, integrity and availability of the systems. Given the strong interdependence of the different domains in the aviation industry, a cyberattack on ATM systems may compromise safety and integrity of the aviation system as a whole. In addition to terrorist-related attacks, the safety issue is concerned with how ATM systems can remain resilient in the face of attacks perpetrated by hackers to gain access to systems or cause disruption for non-terrorist purposes and attacks carried out for commercial espionage. Link with SI-5017 ‘Cyber attacks’.

**Deconfliction of IFR and VFR traffic (SI-2030) (Amended)**

Ineffective deconfliction of flights adhering to IFR and VFR in an airspace class where at least one of the flights is not under ATC separation has been identified as a strong contributor to airborne collision risk. Such airspace classes include class E, controlled airspace where VFR flights are not subject to ATC clearance and no IFR-VFR separation is provided by ATC, and class G, where neither IFR flights nor VFR flights are subject to ATC clearance and ATC does not provide any separation service. The safety issue arises due to the fragmented knowledge of the traffic situation as some traffic is subject to ATC clearance (i.e. IFR) and some traffic is not (i.e. VFR). ATC may not be aware of VFR flights or their intentions and potentially may not pass traffic information to the IFR traffic. In addition, some of the VFR traffic may not be equipped with an ACAS or even a transponder (C or mode-S), reducing the conspicuity of VFR traffic. As a result, both IFR and VFR traffic have to rely solely on the visual acquisition by the flight crew to maintain separation. This safety issue addresses how the conspicuity of VFR traffic can be improved as well as best practices to underscore the importance of existing procedures in maintaining airborne separation. This safety issue is captured in the Non-Commercial operations – small aeroplanes Safety Risk Portfolio and is also relevant to the Commercial air transport — aeroplanes domain. Link with SI-4010 of the NCO SA portfolio and SI-0043 in the CAT A portfolio.
Deconfliction with aircraft operating with a malfunctioning/non-operative transponder (SI-2002)

When an aircraft with a non-operative transponder or malfunctioning transponder operates in an airspace where aircraft must be equipped with a secondary surveillance radar (SSR) transponder, the incorrect information transmitted by the transponder increases the risk of airborne collision or terrain collision. Without a functioning transponder, ATC may be misled by the incorrect data on the aircraft’s position, and this may result in ATC issuing a clearance which poses a safety risk to another aircraft or to the aircraft itself if the clearance directs it into a terrain e.g. a mountain. As the operation of ACAS is contingent on a functioning transponder, other nearby aircraft will not be able to receive traffic advisories or RAs to maintain separation with the aircraft without a functioning transponder. This safety issue explores the frequency of such occurrences and whether the existing procedures suffice in mitigating the risk posed by aircraft operating without a functioning transponder.

Failure of air-ground communication service (SI-2018) (CC effect)

Failure of the air–ground communication system may degrade the performance of the communications service and increase safety risk to an unacceptable level. Air–ground communication refers to aeronautical fixed and mobile services to enable air-to-ground voice or data communication for ATC purposes. Common failures in voice communications include radio equipment malfunction (in the air and on the ground), loss of communication, blocked frequency, radio interference, and sleeping VHF receiver problem. Another key mode of the air–ground communication service is controller–pilot data link communications (CPDLC), which allows ATCOs to transmit non-time-critical messages to an aircraft as an alternative to voice communications. Common failures in CPDLC include technical failure of the data link equipment (air and ground) and disconnections known as ‘provider aborts’. This safety issue explores how such failures can be prevented using pre-emptive measures and the best practices to manage such failures on a tactical basis when they occur. The impact of the failure of air–ground communication service includes the entire provision of ATS.

Failure of navigation service (SI-2016) (CC effect)

Failure of the navigation service can lead to the loss of the facilities and services (VOR, DME, ILS, GNSS, NDB) that support aircraft with positioning and time, and thus increase safety risk to an unacceptable level.

This could potentially lead to the situation that the crew does not know the correct position of the aircraft, or the indicated position is not correct. This could lead to the overload of the ATCOs when they are required to provide the missing information verbally or via the system. For example, a corrupted/interrupted ILS signal can lead to an unstabilised approach, go-around, and even CFIT.

This safety issue covers appropriate maintenance, procedures to identify failures and their impact on ATS, procedures to operate in degraded modes of operation, and training of staff to deal with abnormal situations.

Failure of surveillance service (SI-2017) (CC effect)

Failure of the surveillance service may degrade the performance of ATS and increase safety risk to an unacceptable level. Surveillance systems are used by air traffic control to determine the respective positions of aircraft to allow safe separation. Such systems include PSR, SSR, GNSS and automatic dependent surveillance – broadcast (ADS-B), wide area multilateration (WAM) and systems for processing and displaying surveillance data.

Effective management of these systems is essential in minimising the impact on ATS. This safety issue covers appropriate maintenance, procedures to identify failures and their impact on ATS, procedures to operate in degraded modes of operation, and training of staff to deal with abnormal situations.

High-energy runway conflict (SI-2005)

A high-energy runway conflict occurs when there is little or no time for the ATCOs to react to a potential conflict between a high-energy landing (indicated airspeed (IAS) of 100 knots or more) or take-off (IAS of 80 knots or
more) and an aircraft which has infringed an active runway, which is also known as a runway incursion. Runway incursion is defined as any occurrence at an aerodrome involving the incorrect presence of an aircraft, vehicle or person on the protected area of a surface designated for the landing and take-off of aircraft. Thus, this safety issue addresses a specific subset of runway incursions.

**Inaccurate provision of weather information (turbulence/windshear/convective weather) (SI-2008)**

Inaccurate or missing weather information on weather phenomena such as turbulence, windshear, and convective weather on board the aircraft (flight crew) and on ground (ATCOs) may lead to aircraft flying through weather phenomena without warning. Depending on the severity of the weather phenomena, passengers or cabin crew may sustain injuries on board. This safety issue is focused on IFR flights in the en-route/approach environment, where improvement in the provision of meteorological information will enable controllers to better manage traffic flows and pass weather information to pilots.

**Inaccurate provision of weather information (wind at low height) (SI-2009)**

The landing phase is considered one of the highest-risk phases of flight due to the high cockpit workload and execution of difficult tasks such as the landing flare. Weather information near the surface of the runway such as tail wind on ground and cross wind is crucial to assist flight crew during the landing phase. Inaccurate weather information may contribute to non-stabilised approaches and increase the risk of runway excursions. As this topic spans across several aviation domains, the scope of this safety issue is focused on the ANSPs’ and ATC’s role in ensuring that accurate and timely weather information is provided to flight crew during the landing phase.

**Inadequate procedure design and obstacle publication (SI-2028)**

With the advent of new navigation systems, the design of instrument flight procedures (IFPs) and its publications have become key enablers of the ATM system globally. They must therefore be managed to ensure that quality-assured procedures are provided in support of ATM operations. Poorly designed IFPs can increase the risk of loss of separation, level bust and CFIT. In addition to well-designed IFPs, it is also essential to ensure that information relating to the IFP is accurate and updated in a timely manner. This reduces potential discrepancies during the take-off/approach of the flight.

**Inadequate ATCO-pilot operational communication (SI-2027)**

Good communication between ATCOs and flight crew is essential in ensuring clear understanding of instructions and maintaining situational awareness. ATCO-pilot communication deficiencies may lead to all types of serious incidents and accidents. Common issues include three or more instructions in a single clearance, incorrect use of standard phraseology, misuse of the aircraft emergency frequency (121.5 MHz), and the uncoordinated introduction of phraseology.

**Inefficient conflict detection with the closest aircraft (SI-2003)**

ATCOs may not detect a conflict between one aircraft and another aircraft close to it due to attention failure. Attention is a limited resource and numerous processes compete for it. In blind spot events the needed elements of attention — vigilance (maintaining awareness) and focus (concentration on the task) — are adversely affected by:

1. competition for the attention resources from other tasks, attempts to remember, increased mental workload; and
2. erosion of the attention resources by filtering mechanisms and physiological factors like distraction and fatigue.

ATCOs usually experience this loss of separation ‘blind spot’ after an incorrect descent or climb clearance in the context of a rapidly developing situation. There is normally very little or no time to react and most of the
conflicting clearances result in an incident. The scope of this safety issue is limited to controlled airspace. While airspace infringements may potentially result in a controller blind spot, these events are excluded from this safety issue as they are addressed in the SI-2025 ‘Airspace infringement’.

**Lack of effectiveness of safety management system (SI-2026)**

Ineffective implementation of safety management systems may lead to deficient management of ATM/ANS risks within the service provider organisations. The complex nature of aviation safety and the significance of addressing HF aspects justify the need for an effective management of safety by the aviation organisations. Shared understanding between regulatory/competent authorities and ANSPs is imperative for an effective SMS functioning in an already ultra-safe industry, like aviation. However, the lack of competent and experienced inspectors and regulatory authorities lead to the risk of bureaucratising SMS seeing it only as a compliance system. This safety issue covers the regulatory requirements and promotion of SMS principles, on both aviation authorities and organisations, and the capability to detect and anticipate new emerging threats and associated challenges. This safety issue is mitigated through the SES Performance and Charging Scheme.

**Lack of understanding and monitoring system performance interdependencies (SI-2022)**

The safety performance of the ANSPs can be affected by a multitude of internal and external factors. While most ANSPs are adept at managing the safety hazards related to their provision of services, it is also important to consider the impact of external factors such as commercial pressure and demands related to increasing capacity and environmental protection on the safety performance of ANSPs. It is important to strike a balance between the competing priorities of safety, efficiency, capacity and environment protection, especially in view of limited resources in most ANSPs. To understand such trade-offs better, regulators and ANSPs should analyse safety performance using a dynamic safety model, such as Rasmussen’s Migration Model, and develop guidelines to prevent ANSPs from drifting towards unsafe operations under the influence of competing priorities. Metrics related to factors that have not been traditionally linked to safety performance can be developed to monitor this practical drift and serve to provide ‘weak signals’ in ATM safety performance.

**Landing/take-off/crossing without clearance (SI-2007)**

Aircraft landing, taking-off and crossing runways without clearance from the ATCO poses a significant runway collision risk. Such events typically happen during critical and high-workload stages of the flight and can result in similar hazardous outcomes, such as runway incursion and runway collision. The safety issue covers contributory factors from both the flight crew and ATCOs ranging from call sign confusion, runway confusion, incorrect phraseology and expectation bias to cockpit overload.

**Level bust (SI-2004)**

Level bust is defined as any unauthorised vertical deviation of more than 300 ft from an ATC flight clearance. Within reduced vertical separation minima (RVSM) airspace, this limit is reduced to 200 ft. Level bust contributes towards the airborne collision and CFIT key risk areas when the aircraft fails to fly at the level to which it has been cleared. Such events may occur due to communication error, flight crew error in entering the clearance in the flight control unit and insufficient time for the flight crew to react to a late re-clearance.

**Mass diversions (SI-2032) (CC effect)**

Mass diversions due to airspace and/or airport closure have pervasive repercussions on various aviation domains, ranging from ATC to flight operations, due to their extensive nature. The large amount of displaced traffic results in an overload for ATC and increase workload for the flight crew. This carries the potential for loss of separation as well as other risks related to high-workload tasks and situational awareness. This safety issue covers policies regarding fuel emergencies, air traffic flow management, ensuring that alternate aerodromes have sufficient capacity, and diversions from many airports to one.
Safety issues raising from new technologies and automation (SI-2015)

This safety issue refers to the potential increase in safety risks due to the complexities arising from the introduction of new technology and concepts in ATM such as remote tower operations and system wide information management (SWIM). With more complex automation, it is important to address the relationship between humans and automation within the framework of a contemporary safety management system.

Undetected occupied runway (SI-2006)

This safety issue pertains to runway incursions by an aircraft landing on or taking-off from an already occupied runway. This could be due to oversight by ATCOs, aerodrome design or other organisational factors. Especially during periods of high workload, the controller may accidentally clear an aircraft or a vehicle to enter a runway even though they had already cleared another aircraft to land on or take-off from the same runway. Aerodrome design is also another key contributor to this safety issue as flight crew or manoeuvring area vehicle drivers may navigate onto the wrong surface if the design of the aerodrome may lead to disorientation.

Use of more than one language on frequency (SI-2029)

This safety issue refers to the risk that occurs when using different languages at the same time on the ATC frequency. Despite that the default language of international aviation worldwide is English, local languages are used concurrently for air–ground communication. Under certain circumstances, pilots might prefer to use their native language to address controllers and controllers might address ground personnel in their native language. Having several aircraft on one frequency, the result might be that certain aircrews do not understand clearances given to an aircraft in the same airspace and the responses of the aircrew. Therefore, the aircrew might not be aware of what the other aircrew is about to do. This can lead to the loss of situational awareness of the involved parties with regard to the respective other traffic in the same airspace.
11. Aerodromes and ground handling — ADR/— GH

The Aerodromes and Ground handling Safety Risk Portfolio was first developed in 2017 by the Agency, in conjunction with the Aerodromes and Ground handling CAG, whose activities have been reactivated in 2023 following a stand-by period in 2022.

The safety issues in the portfolio are sorted into the ‘Assess – Elevated priority index’, ‘Assess – Normal-to-low priority index’, ‘Mitigate – define’, ‘Mitigate – implement’, and ‘Monitor’ categories, which provide a snapshot of their status within the European SRM process by priority. The safety issue prioritisation method is described in the Introduction of this Volume. To understand each safety issue better, please click on the safety issue in the list to access their description.

The Aerodromes and Ground handling Safety Risk Portfolio has currently 31 safety issues, identified from various sources as per the EU SRM process, discussed in the Agency’s CAGs and reviewed by the Agency itself.

Since the last edition, 24 safety issues have been amended, 1 safety issue, SI-5031 ‘Ground handling training programmes disruption’ transferred here from the Systemic and conjunctural (SYS & CONJ) Safety Risk Portfolio and 5 safety issues removed or merged with existing ones.

The safety issues with the highest SIPI score in the portfolio are ‘Poor coordination and control of turnarounds’ (SI-1010) and ‘Ground staff movement around aircraft’ (SI-1019). A safety issue assessment is currently under progress for SI-1019.

It should also be noted that 3 safety issues of the portfolio are affected by the climate change and are identified below by ‘(CC effect)’ after the safety issue title.

Please refer to Appendix A to this Volume for the detailed links between safety issues and key risk areas. In terms of both aggregated ERCS score and number of contributing safety issues, the top key risk area for the aerodrome and ground handling domain is ground damage.

For more information on the key risk areas associated to the aerodrome and ground handling domain, please refer also to the EASA ASR 2023 Chapter 6 Aerodromes and ground handling Figure 6.5 ‘Key risk areas by aggregated ERCS score and number of risk-scored occurrences involving aerodromes and ground handling’.

List 11-1: Aerodromes and ground handling safety issues per category & priority

Assess – Elevated priority index

Facilitates Step 2: Assessment of safety issue

- Poor coordination and control of turnarounds (SI-1010) (Amended)
- Ground staff movement around aircraft (SI-1019) (Amended)

Assess – Normal-to-low priority index

Facilitates Step 2: Assessment of safety issue

- Poor maintenance and serviceability of runways/taxiways (SI-1032) (Amended)
- Incorrect operation of ground support equipment (SI-1024) (Amended)
- Poor safety reporting culture of organisation (SI-1038) (Amended)
- Worker fatigue leading to human error (SI-1039)
- Ground conflict during aircraft taxiing operations (SI-1001) (Amended)
- Ineffective control of bird and wildlife (SI-1005) (Amended)
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11. AERODROMES AND GROUND HANDLING — ADR/— GH

- Errors in load sheets and other documentation/systems (SI-1022) (Amended)
- Poor or inadequate runway/taxiway design and layout (SI-1029) (Amended)
- Poor maintenance and serviceability of ground support equipment (SI-1033) (Amended)
- Ground operations in extreme temperatures (SI-1044)
- Poor or inadequate apron/stand design and layout (SI-1003) (Amended)
- Poor or inadequate design of ground support equipment (SI-1013) (Amended)
- Improper parking and positioning of aircraft (SI-1026) (Amended)
- Ineffective control of airside works (SI-1008) (Amended)
- Pushback operations incorrectly performed (SI-1028) (Amended)
- Ineffective control of passengers on the apron (SI-1009) (Amended)
- Baggage and cargo loading in passenger aircraft (SI-1004) (Amended)
- Incorrect operation of air bridges/passenger boarding bridges (SI-1023) (Amended)
- Inadequate cargo loading in cargo aircraft (SI-1006) (Amended)
- Inadequate handling of dangerous goods and lithium batteries (SI-1011) (Amended)
- Ground handling training programmes disruptions (SI-5031) (Transferred)
- Fuelling operations incorrectly performed (SI-1017) (Amended)
- Ground operations in low-visibility conditions (SI-1018)
- Towing operations incorrectly performed (SI-1002) (Amended)
- Ground operations in high winds, rain and thunderstorms (SI-1042)
- Poor maintenance and serviceability of apron/stand (SI-1031) (Amended)
- Ground operations in snow/ice conditions (SI-1043)
- Jet blast (SI-1021)
- Poor management of emergency/abnormal operations (SI-1015) (Amended)

**Baggage and cargo loading in passenger aircraft (SI-1004) (Amended)**

The issue relates to the inadequate management or handling of the baggage and cargo loading process which may result in a significant change in the centre of gravity of the aircraft or the actual weight of the aircraft without the flight crew becoming aware. This safety issue includes the procedures, training and equipment provided to the ground handling personnel to perform their duties. It also includes the coordination with other actors (dispatch, flight crews, etc.).

**Errors in load sheets and other documentation/systems (SI-1022) (Amended)**

This safety issue covers errors and omissions in load systems and documentation or systems for recording loading of aircraft. Errors in the load sheets and other documentation can lead to incorrect pre-flight calculations of flight parameters, which may put the aircraft in an unsafe state. In a well-functioning operational environment,
the completion and reconciliation of load sheets and other documentation or systems for recording loading of aircraft are carried out properly.

**Fueling operations incorrectly performed (SI-1017) (Amended)**
This safety issue covers the management and handling of the aircraft refuelling process and its coordination/oversight. In a well-functioning operational environment, fuelling operations are correctly managed to ensure that all activities are carried out effectively in accordance with relevant regulations, procedures and processes. Adherence to the procedures and communication with crew (flight/cabin) during fuelling with pax on board or during embarking/disembarking are important factors to avoid fire, spillage, contamination, misfuelling and incorrect fuel load and fuel quality, etc.

**Ground conflict during aircraft taxing operations (SI-1001) (Amended)**
This safety issue covers all potential ground conflict events that may occur when the aircraft is moving under its own power on the taxiway, such as collisions or near collisions with other aircraft, ground vehicles, ground equipment and ground infrastructure, or persons.

**Ground handling training programmes disruption (SI-5031) (Transferred)**
Over 2023, it was observed in many EASA Member State airports that the shortage of ground handling staff led to recruiting staff with low competence and experience. In addition to the issues faced for all aviation personnel in missing training and reduced recency, ground handling has the following unique factors:

- higher staff turnover requiring more frequent training;
- less secure job contracts in some companies leading to extensive loss of staff rather than furlough;
- seasonal staff recruitment (may or may not be a problem);
- seasonal recurrent training; for example, for winter operations.

**Ground operations in extreme temperatures (SI-1044) (CC effect)**
Negative effects of extreme temperatures (high or low) on ground operations may lead to unsafe situations in the airside operational environment. In a well-functioning operational environment, the effective handling and management of ground operations in extreme temperatures will mitigate the risks of unsafe situations.

**Ground operations in high winds, rain and thunderstorms (SI-1042) (CC effect)**
Negative effects of high winds, intense rain and thunderstorms on ground operations may lead to unsafe situations in the airside operational environment, such as equipment malfunctions (e.g. non-functioning windscreen wipers on vehicles) or equipment caught by winds, as well as danger of staff and/or passengers being struck by lightning. In a well-functioning operational environment, the effective handling and management of ground operations in high winds, intense rain, thunderstorms, etc. will mitigate the risks of unsafe situations.

**Ground operations in low-visibility conditions (SI-1018)**
Negative effects of low visibility in ground operations may lead to unsafe situations in the airside operational environment, especially potential collisions on ground. In a well-functioning operational environment, the effective handling and management of ground operations in low-visibility conditions will mitigate the risks of unsafe situations.
Ground operations in snow/ice conditions (SI-1043) (CC effect)

Negative effects of winter conditions on ground operations may lead to unsafe situations in the airside operational environment. In a well-functioning operational environment, the effective handling and management of ground operations in winter conditions will mitigate the risks of unsafe situations.

Ground staff movement around aircraft (SI-1019) (Amended)

This safety issue addresses the movement of ground personnel around the aircraft on the apron during the aircraft turnaround process, resulting in potential unsafe separation between the personnel and the aircraft. Such unsafe separations can cause fatal injuries due to an aircraft engine ingestion or jet blast, or due to direct collisions between the aircraft and the ground personnel. The safety issue considers all phases of the turnaround, in particular when:

- the aircraft moves under its own power, which is the case for almost all arrivals at the parking stand;
- the aircraft is moved during the pushback phase and the towing phase;
- any uncontrolled movement of the aircraft on the apron which is not caused by the aircraft own power;
- aircraft cross-bleed engine starts are performed and a high engine power is used in areas where only idle power is expected.

This safety issue only addresses the unsafe separations of ground personnel moving by their own means on the apron; it does not include the movement of personnel when driving vehicles on the apron, which is addressed by SI-1024. This safety issue does not include the movement of passengers on the apron, which is addressed by SI-1009.

Improper parking and positioning of aircraft (SI-1026) (Amended)

This safety issue covers the procedures and processes of marshalling, parking or positioning of aircraft which, if done incorrectly, may lead to damage or injuries. It includes issues related to visual parking aids, manual marshalling and stand allocation. In a well-functioning operational environment, aircraft are marshalled, parked and positioned on an aerodrome such that sufficient clearance from other aircraft and objects is ensured.

Inadequate cargo loading in cargo aircraft (SI-1006) (Amended)

This safety issue covers the management or handling of the cargo loading process that may lead to ground damage or other safety repercussions. Cargo loading is correctly managed and handled to ensure that all activities are carried out effectively in accordance with relevant regulations, procedures and processes. The issue relates to the inadequate management or handling of the cargo loading process, which may result in a significant change in the centre of gravity of the aircraft or the actual weight of the aircraft without the flight crew becoming aware. This safety issue includes the procedures, training and equipment provided to the ground handling personnel to perform their duties. It also includes the coordination with other actors (dispatch, flight crews, etc.).

Inadequate handling of dangerous goods and lithium batteries (SI-1011) (Amended)

Fires involving lithium batteries and/or other dangerous goods, both in the aircraft cabin or hold areas, followed by the potential inability to extinguish any subsequent fire may lead to an aircraft environment incompatible with human life. In a well-functioning system, dangerous goods and lithium battery handling is correctly identified and managed to ensure that all activities are carried out effectively in accordance with relevant regulations, procedures and processes.
**Incorrect operation of air bridges/passenger boarding bridges (SI-1023) (Amended)**

This safety issue covers the operation of air bridges or passenger boarding bridges (PBBs), which, if done incorrectly, may lead to collisions between aircraft and PBBs or injuries to personnel or passengers. In a well-functioning operational environment, the operation of air bridges follows effective user training and the correct use of effective procedures and processes.

**Incorrect operation of ground support equipment (SI-1024) (Amended)**

This safety issue covers the operation of both motorised and non-motorised ground support equipment (GSE) on the aerodrome movement area, which, if done incorrectly, may lead to collisions between aircraft and GSE or injuries to personnel or passengers.

This safety issue also includes the inadequate positioning or securing of GSE such as baggage trolleys/dollies, unit load devices (ULDs), steps, etc. when they are not in use. If done incorrectly, GSE may be blown around the apron due to bad weather, jet blast or other external influence and, consequently, cause damage to aircraft or injuries to passengers or personnel.

**Ineffective control of airside works (SI-1008) (Amended)**

Improper supervision, coordination and control of airside works may lead to aircraft damage and/or injuries. Airside works are properly supervised, coordinated and controlled to ensure safe operations. This safety issue covers all potential events that may occur where airside works are involved, such as ingestion of FOD produced by construction equipment/material, aircraft collisions with vehicles/equipment, etc.

**Ineffective control of bird and wildlife (SI-1005) (Amended)**

Insufficient control of birds and wildlife may lead to either damage to the aircraft or loss of control during take-off or landing. By understanding bird and wildlife habitats in detail, aerodrome operators can develop and implement bird and wildlife hazard management plans to manage such activity in and around the aerodrome, thereby minimising the risk for bird strikes and bird ingestions in engines, which may lead to critical situations during take-off/climb and approach/landing.

**Ineffective control of passengers on the apron (SI-1009) (Amended)**

This safety issue covers the ineffective or insufficient control of passengers on the apron or any other operational area of the aerodrome or airport. If passengers move outside of designated areas on the apron, the risk of sustaining injuries increases. In a well-functioning operation, passengers are correctly controlled between leaving the terminal and entering the aircraft and vice versa.

**Jet blast (SI-1021)**

This safety issue covers the management of ground running or taxi patterns, which may lead to injuries or damage due to jet blast. In a well-functioning operational environment, ground running and taxi patterns are properly managed to mitigate the consequences of jet blast.

**Poor coordination and control of turnarounds (SI-1010) (Amended)**

This safety issue addresses the poor or inadequate management or coordination of the turnaround process, covering the period from leaving the centre line of the taxiway until the aircraft leaves under its own power. This includes the non-application or incorrect application of procedures due to mismanagement, in particular those relating to loading and off-loading of passengers and cargo, fuelling operations or those involving coordination with other entities (such as the aerodrome operator or other handling companies).
**Poor maintenance and serviceability of apron/stand (SI-1031) (Amended)**

This safety issue covers the serviceability and maintenance of aprons/stands which, if not performed correctly, may lead to collisions, damage, and/or injuries, including FOD being ingested in aircraft engines or ejected by engines jet blast.

In a well-functioning operational environment, the serviceability and maintenance of aprons/stands are performed effectively and thus facilitate safe operations at aprons/stands.

**Poor maintenance and serviceability of ground support equipment (SI-1033) (Amended)**

This safety issue covers the serviceability and maintenance of both motorised and non-motorised airport GSE including belt loaders, baggage trucks, catering trucks, fuel bowser and pushback equipment, steps, baggage trolleys/dollies, ULDs, which, if not performed correctly, may lead to damage and/or injuries. In a well-functioning operational environment, the serviceability and maintenance of airport GSE are performed effectively and thus facilitate safe operations of airport GSE.

**Poor maintenance and serviceability of runways/taxiways (SI-1032) (Amended)**

This safety issue covers the serviceability and maintenance of runways/taxiways which, if not performed correctly, may lead to collisions, damage, and/or injuries, including FOD being ingested in aircraft engines or ejected by engines jet blast. In a well-functioning operational environment, the serviceability and maintenance of runways/taxiways are performed effectively and thus facilitate safe operations on runways and taxiways.

**Poor management of emergency/abnormal operations (SI-1015) (Amended)**

The supervision, coordination and control of emergency/abnormal operations may lead to damage, injuries, and/or impaired responses to emergencies. In a well-functioning operational environment, emergency/abnormal operations are properly supervised, coordinated and controlled to ensure safe operations.

**Poor or inadequate apron/stand design and layout (SI-1003) (Amended)**

Effective apron/stand design and layout is crucial in ensuring safe operations during aircraft taxiing, aircraft parking and loading/unloading of baggage. Poor design and layout may induce the potential for collisions, aircraft damage, and injuries. Important factors to consider are placement and marking of designated areas for parking of ground equipment, proximity to adjacent stands/buildings/structures, evaluation of needed space against the minimum required space, etc.

**Poor or inadequate design of ground support equipment (SI-1013) (Amended)**

This safety issue covers the design of both motorised and non-motorised airport GSE, including belt loaders, baggage trucks, catering trucks, fuel bowser, pushback equipment, steps, baggage trolleys/dollies. If the design of the equipment is not fit for purpose, it may lead to damage and/or injuries. Effective design of GSE will prohibit occurrences where damage and/or injuries are sustained due to improper design of the GSE.

**Poor or inadequate runway/taxiway design and layout (SI-1029) (Amended)**

Complex runway/taxiway design and layouts may induce a higher probability of runway incursions or the potential for collisions and aircraft damage. In a well-functioning environment, the design of runways/taxiways minimises the likelihood of incursions and/or collisions.
Poor safety reporting culture of organisation (SI-1038) (Amended)
This safety issue relates to lack of (or still limited) safety reporting culture in organisations of the aerodrome and ground handling sector. The safety issue addresses in particular the following aspects associated with poor reporting culture:

- some safety events go unreported due to fear of repercussions, lack of awareness of and training on occurrence reporting and just culture;
- safety occurrences reported to authorities (according to Regulation (EU) No 376/2014) and/or organisations are not always shared between the organisations involved in the occurrence. For example, a report submitted by an airline or an aerodrome operator concerning a ground handling issue at a specific airport is not always systematically shared with the ground handling service provider and/or the aerodrome operator.

In a well-functioning organisational environment, the reporting culture and just culture within the organisation facilitates the systematic and accurate reporting of safety events by ground staff to ensure that a safety assessment is carried out.

Pushback operations incorrectly performed (SI-1028) (Amended)
This safety issue covers the management, handling and coordination of the pushback, which, if done incorrectly, may lead to collisions with other aircraft or ground vehicles/equipment and/or injuries to ground personnel. In a well-functioning operational environment, pushbacks are correctly managed and coordinated to ensure safe operations.

Towing operations incorrectly performed (SI-1002) (Amended)
This safety issue covers all potential events that may occur when the aircraft is being towed, such as collisions with ground vehicles, ground equipment and ground infrastructure, damage to the towing vehicle and/or towing equipment and injuries to towing personnel. It includes both towing performed with nose gear elevation (towbarless, no person in cockpit), as well as towing with towbar (person in cockpit). In this safety issue, towing operation out of a parking position (pushback) is not included — this is addressed in SI-1028.

Worker fatigue leading to human error (SI-1039)
The inability to recruit and retain ground handling staff is leading to staff shortages, long working hours and an ageing workforce. In the long term, if left unchecked, commercial growth and expectations will exceed human resources, resulting in unsustainable operations with possible safety-critical impact on flight safety due to human error.
### Appendix A

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<thead>
<tr>
<th>Portfolio</th>
<th>SI ID</th>
<th>Safety issue title</th>
<th>All</th>
<th>Airborne collision</th>
<th>Aircraft upset</th>
<th>Collision on runway</th>
<th>Ground damage</th>
<th>Obstacle collision in flight</th>
<th>Excursion</th>
<th>Terrain collision</th>
<th>Security</th>
<th>Fire, smoke and pressurisation</th>
<th>Other injuries</th>
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