



European Aviation Safety Agency
Comment-Response Document 2016-18

Appendix
to ED Decision 2017/019/R

RELATED NPA: 2016-18 — RMT.0369 & RMT.0370 (OPS.077 (a) & (b)) — 28.8.2017

Table of contents

1. Summary of the outcome of the consultation	2
2. Individual comments and responses	3



1. Summary of the outcome of the consultation

Please refer to the Explanatory Note to Decision 2017/019/R for the summary of the outcome of the consultation.



2. Individual comments and responses

In responding to comments, a standard terminology has been applied to attest EASA's position. This terminology is as follows:

- (a) **Accepted** — EASA agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — EASA either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — EASA acknowledges the comment but no change to the existing text is considered necessary.
- (d) **Not accepted** — The comment or proposed amendment is not shared by EASA.

(General Comments)	-
---------------------------	---

comment	3		comment by: <i>DGAC France</i>
		Please note that DGAC France has no specific comment on this NPA.	
response		<i>Noted</i>	
comment	5		comment by: <i>UK CAA</i>
		Thank you for the opportunity to comment on NPA 2016-18, Prediction of wind shear for aeroplanes performing commercial air transport operations. Please be advised that there are no comments from the UK Civil Aviation Authority.	
response		<i>Noted</i>	
comment	6		comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i>
		The Swedish Transport Agency (STA) supports the conclusion that no regulatory action is needed to require RWSs and/or PWSs for European-registered aircraft, based on the assessment performed by EASA.	
response		<i>Noted</i>	
comment	7		comment by: <i>Luftfahrt-Bundesamt</i>
		LBA comments The LBA agrees with option 2. Reasons: Even after 2023, there will be a great number of aircraft that otherwise would not be equipped with PWS. Furthermore, according to our opinion and experience, climate change is noticeable to the extent that weather phenomena associated to wind shear have	

	<p>considerably increased in the past years. It can be noticed that, in total, storms are heavier (thunderstorms) and earlier in the year. However, this is a subjective impression that, if necessary, should be supported by scientific data.</p>
response	<p><i>Noted</i></p> <p>The number of wind shear events may vary in the future. However, a potential increase in the frequency of wind shear encounters would not necessarily lead to an increase in the number of accidents. Thus, the result of the cost-effectiveness analysis performed would in principle not vary.</p>
comment	<p>8 comment by: <i>European Cockpit Association</i></p> <p>ECA welcomes the opportunity to comment on the Notice of Proposed Amendment 2016-18 - Prediction of wind shear for aeroplanes performing commercial air transport operations. At this occasion, we would like to submit the following comments to EASA:</p> <ul style="list-style-type: none"> - There is no evidence that turboprops are less susceptible to the effects of windshear than jet aircraft. Reasoning: windshear does not damage aircraft, it just degrades their flight path, "pushes" them to the ground <p>Additional source: https://ntrs.nasa.gov/archive/nasa/casi.ntrs.nasa.gov/20130013459.pdf</p> <ul style="list-style-type: none"> - EASA states that air travel will be increasing in the next decades. However, the factor that has not been taken into account, is that the climate is changing as well, with a high likelihood for e.g. thunderstorms increase over the next years <p>https://www.munichre.com/en/reinsurance/magazine/topics-online/2016/topicsgeo2015/severe-thunderstorms-in-europe/index.html</p> <ul style="list-style-type: none"> - Having in mind the average lifetime of a modern airliner, we would therefore strongly recommend all new aircraft types to be equipped with PWS
response	<p><i>Not accepted</i></p> <p>The effects of wind shear on turboprop-powered aeroplanes were not the only factor considered; the other reasons to discard the option of installing the equipment in turboprop-powered aeroplanes are that:</p> <ul style="list-style-type: none"> — the data available indicates that there were no accidents where wind shear was identified as a causal factor; and — they would be more impacted by the cost of the system. <p>Therefore, even if turboprops were as susceptible to the effects of wind shear as turbojet aircraft are, the conclusion would not vary.</p> <p>As regards climate change, although EASA does not have any data on whether this may pose a higher risk to aviation in general, this change may not necessarily lead to an increase in the number of wind-shear-related accidents. Thus, the result of the cost-benefit analysis performed would in principle not vary.</p>
comment	<p>9 comment by: <i>EUROCONTROL</i></p> <p>The EUROCONTROL Agency shares the views of EASA concerning the safety issue related to the effects of wind shear on commercial air transport aeroplanes (EASA NPA 2016-18).</p>

response	<i>Noted</i>
----------	--------------

NPA 2016-18 — Executive Summary

p. 1-2

comment	<p>1 comment by: <i>British Airways Flight Operations</i></p> <p>British Airways Flight Operations commends the Agency for the work undertaken in the production of this NPA, and notes the conclusions contained within it. It agrees with the Agency's conclusion that Option zero is preferred. Whilst Predictive Windshear technology is a valuable aid to safety, it is not feasible to fit it to all aircraft, and, as the Agency's analysis demonstrates, it is not possible to determine a positive cost/benefit case for such equipment in all cases either.</p>
---------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

response	<i>Noted</i>
----------	--------------

comment	<p>4 comment by: <i>IACA International Air Carrier Association</i></p> <p>Dear,</p> <p>IACA agrees with the EASA proposal</p> <ol style="list-style-type: none"> 1. 1. not to mandate RWS and/or PWS for new EU aircraft. 2. 2. not to retrofit EU aircraft with RWS and/or PWS. 3. 3. for safety promotion providing recommendations on wind-shear-related training in the context of (EBT) evidence-based training. <p>IACA has no further comments on NPA 2016-18.</p> <p>Erik Moyson SSCC member</p>
---------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

response	<i>Noted</i>
----------	--------------

4. Regulatory impact assessment (RIA)

p. 7-19

comment	<p>2 comment by: <i>NetJets Europe</i></p> <p>NetJets supports the adoption of Option 0.</p>
---------	---------------------------------------------------------------------------------------------------------------------------------

response	<i>Noted</i>
----------	--------------

