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Mrs Louise Ellman
MP Chair of the Transport Committee
House of Commons
7 Millbank, London - SW1P 3JA
UNITED KINGDOM

Subject: Transport Committee report on Offshore helicopter safety

Reference: Transport Committee letter dated 10 Nov. 2014

Attachment: Update on the status of 14 recommendations addressed to EASA

Dear Mrs Ellman,

We thank you for giving EASA the opportunity to provide an update on the follow-up of the 13 recommendations made by the UK CAA to EASA in CAP 1145 and also to comment on the report on this subject, published on 8 July 2014, and the pertinent responses from the UK Government, the UK Civil Aviation Authority (CAA) and Oil & Gas UK, published on 27 October.

Firstly I would like to take this opportunity to stress that the harmonisation role played Europe-wide by EASA does not “average down” safety standards for any Member States. EASA has been granted a legal mandate to contribute to the achievement of the highest common standards of safety and environmental protection in civil aviation. We can assure you that EASA is fully committed to this mandate and is executing it with due care.

Moreover, it should be noted that EASA has been established to achieve those standards through partnership and working cooperatively with the other European Aviation Authorities, in the frame of a shared responsibility aimed to build a sound and robust European aviation safety system.

Accordingly, it is important to reaffirm that the complementarity of the common standards set by the EU with the national implementation promoted by the NAAs is an essential pillar of the safety strategy now in force in Europe.

The criticism to EASA referred to in your Second Report “for being insufficiently responsive to safety recommendations from the AAIB” is, in our opinion, unfounded. It should be noted that the closing action stimulated by a safety recommendations can take in some cases an extended time to be finalized, especially when related to Rulemaking which encompasses among others public participation in the process.

This has also been acknowledged in the “Responses to the Committee's Second Report of Session” published by the Transport Committee on 20 October 2014, by stating that a “wide-ranging and comprehensive review into offshore helicopter safety and strong recommendations on safety governance, airworthiness and equipment... will take time to implement”. In this regard, due coordination and careful consideration of external advice are also essential elements that ensure the delivery of safe and proportionate rules or airworthiness actions, especially when this leads to non-negligible impact on our stakeholders.

Since its foundation, the Agency created a robust and systematic process for managing incoming Safety recommendations. In full compliance with the EU Regulation 996/2010, the Agency is strongly committed to provide responses within the 90 days timeframe requirements. In addition, replies are regularly updated until the completion of all tasks.

From the start of the review, EASA committed to fully cooperate with the UK CAA and treat the Offshore helicopter recommendations contained in the CAP 1145 document with the highest level of priority, and under the same rigorous process as for those stemming from accident investigations.

This decision was followed by creating an internal Project Team to holistically and more systematically look at the safety concerns related to Offshore helicopter operations in the North Sea.

An initial reply to CAA UK was provided by EASA on 10th April 2014 (Refer to Letter in Annex 1). As a complementary action, we are pleased to provide in Annex 2 an update on the status of the 14 recommendations received.

We want to reassure you that EASA is working to continuously promote the highest safety standards for the offshore operations.

For any further specific clarification or communication on this subject, our Head of the Safety Intelligence and Performance Department, Mrs Rachel Daeschler, who is in charge of accident follow-up and safety recommendations, remains at your disposal.

Yours Sincerely,

Trevor WOODS
Flight Standards Director, EASA

Annex 1 – EASA Letter of the 10th April 2014

Annex 2 – Table with update for CAP1145 recommendations addressed to EASA

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Rec.	Description	Details
R01	It is recommended that EASA leads the development of a management system that provides a structured review of all accident and serious incident reports and recommendations of helicopters operating offshore or events which could have led to a ditching if the helicopter had been over water. This should be done in collaboration with other North Sea NAAs and the CAA to ensure a cohesive assessment of both accident causes (looking for trends) and remedies (looking for suitability and effectiveness) in order to prevent the segregated nature of accident reviews and ensure there is continuity to the safety reviews.	As a part of a new strategy on Safety Management and Safety Data processing, EASA is in the process of establishing so-called Coding and Analysis Groups (CAGs) within each aviation domain (Fixed-Wing Commercial Air Transport, Helicopters and General Aviation). CAGs are groups of experts from the industry, operators, authorities and other stakeholders who will be tasked with analysing safety data in an effort to improve safety. The HADCAG (Helicopter Accident Data Coding and Analysis Group) was formed in late 2013 and in the context of this recommendation, a sub-group of the HADCAG was established and tasked with analysing offshore helicopter accidents in EASA MS operation in the period 2009-2013. The HADCAG Offshore Sub-Group had its first meeting on 18-19 November 2014 and a short bulletin with the initial outcomes will be provided early 2015, whilst an in-depth report will be provided during the first quarter of 2015.
R02	It is recommended that EASA involve NAAs annually in a forum to agree and exchange information on the performance of safety actions taken in line with accident and serious incident investigation recommendations and potential other improvements that could be adopted, where appropriate.	The scope of this recommendation was extended in order to include all NAAs. Two forum events were held to date in April 2014 and November 2014 and further meetings are scheduled on a basis of twice a year.
R03	It is recommended that EASA introduces procedures to monitor and track the efficiency and reliability of maintenance interventions when these are used during the certification activity to assure the safety target of the rotorcraft.	EASA continues to assess the practicality of several approaches to monitor and confirm the efficiency and reliability of maintenance tasks. To this end, the Agency has drafted more detailed guidance for ensuring continuing airworthiness specific to safety critical components and is formalising a rotorcraft specific Maintenance Review Board process.

Rec.	Description	Details
R04	It is recommended that EASA ensures that the Type Certificate Holder completes a design review following a failure or malfunction of a component or system on any other similar feature on that aircraft type or any other type in their product line and defines appropriate corrective actions as deemed necessary.	This is already addressed under existing continuing airworthiness processes and procedures and defined in Commission Regulation (EU) No 748/2012 Part 21.A.3A(b).
R06	It is recommended that the EASA Helicopter Ditching and Survivability RMT.0120 consider making safety and survival training for offshore passengers a requirement.	Under consideration, discussions occurring with industry and participating authorities but not under the scope of the RMT.0120 as this task is limited to certification aspects. The operational aspects of survivability are being addressed as part of the OPS rulemaking activities (RMT.0409).
R12	It is recommended that EASA require helicopter manufacturers, in conjunction with the major operators of the type and NAAs, to review their recommended training material so that pilots are better prepared for operating modern highly complex helicopters.	In February 2014, EASA implemented the new concept of Operational Suitability Data (OSD), to succeed Operational Evaluation Boards (OEB). OSD encourages manufacturers, helicopter operators, training organisations and EASA to work together to provide adequate type rating training for all aircraft – including helicopters – and allows the highlighting of Training Area of Special Emphasis (TASE) for specific types.
R20	It is recommended that EASA / Type Certificate Holder confirm the number of false engine fire warnings on offshore helicopters, investigate the reasons for them and determine what actions to take to address this important safety issue.	EASA and manufacturers are working closely together in this process to address false warnings, and improve fire detection capabilities. Manufacturers are continuing work to modify their systems to improve reliability. On newer models, some now offer tail fin mounted cameras to assist with in-flight confirmation of fire indications or other problems. In conjunction with the national aviation authorities, EASA is conducting an analysis of known engine fire warning occurrences on Public Transport Large Helicopter Operations and will release the first results mid-2015.

Rec.	Description	Details
R22	<p>It is recommended that EASA initiate a rulemaking task to adopt the critical parts life monitoring and assessment requirements of Certification Specifications for Engines (CS-E) for large transport rotorcraft, currently subject to CS-29, including retrospective application. This should cover at least for the following areas:</p> <ul style="list-style-type: none"> i. Residual stress assessments ii. Vibratory stress measurements iii. Manufacturing plan iv. Laboratory examination of time expired part 	<p>Certification Specifications for Rotorcraft, already includes a requirement, CS 29.602, to address the control of critical parts through the design, manufacturing, and operational phases of their lives. Residual stress assessment and vibratory stress measurement are already part of the expected compliance to CS 29.571.</p> <p>Nonetheless, the relevant sections of Certification Specifications for Engines (CS-E) are being reviewed to determine if additional guidance on critical parts would be beneficial, in particular the control throughout the life cycle. If so, an improved guidance will be considered, noting that in this context the guidance that has been drafted in relation to R3 overlaps significantly with this recommendation.</p>
R23	<p>It is recommended that EASA revise CS-29.602 for large transport rotorcraft intended to operate over hostile sea conditions for extended periods of time, to ensure the failure mode effects and criticality analysis process used to identify critical parts recognises that a safe ditching may not always be possible.</p>	<p>It has been agreed between UK CAA and EASA that the recommendation would not yield a measurable increase in safety based on the accidents considered in the report. (Note: these airworthiness related accidents have all involved failure of critical parts.) Nonetheless in the wider context of offshore operations, EASA will continue to evaluate whether additional airworthiness requirements may be of benefit. See R25 below.</p>
R24	<p>It is recommended that EASA provide additional guidance material to improve standardisation in approach to the classification of critical parts, to minimise inconsistencies in the instructions for continuing airworthiness and where appropriate to require revisions to existing Instructions for Continued Airworthiness.</p>	<p>The relevant sections of Instructions for Continued Airworthiness were reviewed to determine if additional guidance on critical parts would be beneficial. The initial review suggests that the AC guidance is adequate.</p> <p>A final position will be developed in coordination with UK CAA.</p>

Rec.	Description	Details
R25	It is recommended that EASA consider developing requirements that could be applied to helicopters which carry out Offshore Operations in hazardous environments in a similar fashion to those used for aeroplane Extended Operations and All Weather Operations.	Based on the available information, it has not been established whether system failures that could contribute to a 'land immediately' situation are meeting the availability and integrity levels assumed at certification. Furthermore, it is not clear what practical scope exists to increase system availability and integrity levels further, how quantitatively this may enhance safety and what impacts it may have on helicopter design. Before starting a rulemaking activity, it will therefore be necessary to undertake additional study and analysis. The EASA is working with UK-CAA to further define the safety objectives. This is linked to R21 and R22.
R26	It is recommended that EASA establish a forum for discussion for best practice and developments on Vibration Health Monitoring (VHM). This forum should include NAAs, operators and VHM manufacturers. The CAA expects that this could be achieved by the end of 2014.	Several groups already exist to address this topic, such as the Society of Automotive Engineers (SAE) HM-1 Integrated Vehicle Health Management Committee in which EASA is involved, and other initiatives by Type Certificate Holders. EASA believes that any new forum would be best sponsored by the manufacturers and helicopter operators, and major highlights could be presented for a wider audience during the EASA Rotorcraft Symposium.
R27	It is recommended that EASA review AMC 29.1465 to clarify alert generation and management, to ensure it is consistent and a system of amber/red warning thresholds is established to allow maintenance staff to identify the severity of the alert.	A draft Certification Memorandum has been prepared to address this, drawing on input from helicopter operators at a meeting in August 2014. Ongoing formal comment process with the plan to finalise the Certification Memorandum by 1Q2015.