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Date: 24/06/2019

Cmt No.	Chapter	Sect.	Page No.	Comment	Proposed change
1	1. Executive Summary		8	At the end of the page, the title of Appendix C needs to be clarified/improved.	It is suggested to replace 'negative priorities' by 'non-priorities'
2	2. Introduction	2.1	10	In the first sentence of the page, the hyperlink to the paragraph related to Runway Safety is not accurate and needs to be corrected.	Replace '0' by '6.1.1.2'
3	2. Introduction	2.1	10	The first EUR RASP covering the period 2019-2023 that is retrieved through the hyperlink (by clicking on 's') on the bottom of the page is a draft version ('draft' appears on top of all pages starting page 3 of the RASP pdf version).	Check the EUR RASP PDF version attached to EPAS.
			9-11	A chart describing the interactions and alignments between the various plans (e.g. GASP, ATM MP, GANP, EASP, EPAS) could be helpful to support the text	Add a chart to describe interactions between various strategic plans
4	2. Introduction	2.1	15	It is noted that the European Safety Risk Management Process (SRM) is described in the introduction of the Annual Safety Review (ASR 2019). Would it be possible to add a hyperlink to the ASR 2019 document? It would be interesting to know whether the description of this process is a copy/paste of the chapter 2.3.2 'The safety risk management process' from previous EPAS 2019-2023 version or if a consistency/alignment with ISO31000 has been ensured.	It is suggested to add the hyperlink to the ASR 2019 in the bottom of the page.
5	2.3.3 How actions are prioritised in EPAS	2.3.3.3	16	A lot of siglum and acronyms are used such as Multi-Criteria Analysis (MCA), Cost-Effectiveness Analysis (CEA), Cost-Benefit Analysis (CBA) but they are not necessarily listed in Appendix F: Acronyms and definitions. What is the	Suggestion is to add all necessary acronyms in the Appendix F especially when the acronym is used alone in the

				rationale to have them listed or not?	document.
6	2.3.3 How actions are prioritised in EPAS	2.3.3.4	17	In the paragraph related to RMTs there is a cross-reference to 'Section 0' that does not exist	Replace 'see Section 0' by 'see Section 3.2.2'
	2.4 How EPAS is structured	2.4	20	Where is the chapter 4 in the Volume 1 description?	Add the Chapter 4
7	3.1.2 Operational safety	3.1.2	31	Aircraft upset in flight (loss of control) <i>"Aircraft upset or loss of control is the most common accident outcome for fatal accidents in CAT aeroplane operations. It includes uncontrolled collisions with terrain, but also occurrences where the aircraft deviated from the intended flight path or aircraft flight parameters, regardless of whether the flight crew realised the deviation and whether it was possible to recover or not. It also includes the triggering of stall warning and envelope protections."</i> Here LOC-I and UPSET are mixed, they shall be addressed independently	Add clear definition of what the LOC-I vs Aircraft upset is, since this can lead to misunderstanding and confusion.
		3.1.2.1	32	At the end of the paragraph there is a cross-reference to 'Section 0' that does not exist	Replace 'see Section 0' by 'see Section 5.1'
8	4. Performance	4.2	63	Requirements table: Reference to applicable Regulatory paragraph is to be verified and corrected.	e.g. Record Keeping in 1178/2011 Regulation is documented in ORA.GEN.220
9	4. Performance	4.2	63	When the Requirements table will be reviewed to include relevant requirements in the initial and continuing airworthiness domains, a subject like ' internal safety reporting scheme' will be relevant to add (e.g. 145.A.202 Internal safety reporting scheme)	Suggestion is to keep this in mind when required.
10	4.Performance	4.3	67	The EAER acronym definition is missing in Appendix F/	Add EAER acronym definition
11	5. Systemic Safety	5.2	77	The intercultural aspect is not mentioned in the Human Factors and Human Performance rationale despite it is playing a crucial role	Add references to the intercultural challenge.
12	6. Flight Operations - Aeroplane	6.1	112	Chapter 6.1 is divided into sub-chapters dealing with Safety / Level Playing Field and Efficiency/proportionality. This is the case also for Chapter 8 General aviation. This split is relevant but why not adopting the same structure for other chapters like chapter 9 (Design and Production) or 10 (Maintenance and Continuing Airworthiness management)	Harmonize the structure of the paragraphs in Volume II in a consistent way.

	6.1.1	112	<p><i>“This section is structured in line with the key risk areas (KRAs) and related safety issues identified in the ASR 2018.”</i></p> <p>It is mentioned that the section is in line with KRAs while the following sub chapters (6.1.1.1, 6.1.1.2, etc...) have different names and some risk areas seems missing.</p>	At least additional information would help to understand the structure of this part
	6.1.1.1	112	<p><i>“Aircraft upset or loss of control is the most common accident outcome for fatal accidents in CAT aeroplane operations. It includes uncontrolled collisions with terrain, but also occurrences where the aircraft deviated from the intended flight path or aircraft flight parameters, regardless of whether the flight crew realised the deviation and whether it was possible to recover or not. It also includes the triggering of stall warning and envelope protections.</i></p>	Same comment as above: Add clear definition of what the LOC-I vs Aircraft upset is, since this can lead to misunderstanding and confusion
13	6.1.1.2	114	<p>Runway safety: High speed Runway excursions on T/O, or T/.O from taxi way etc. are not addressed here. This may need to be extended</p>	Extend the various cases to Runway excursions on T/O, or T/.O from taxi way etc...
14	6.1.1.4	118	<p>Terrain Collision</p> <p><i>“This risk area includes the controlled collision with terrain together with undershoot or overshoot of the runway during approach and landing phases. It comprises those situations where the aircraft collides or nearly collides with terrain while the flight crew has control of the aircraft. It also includes occurrences which are the direct precursors of a fatal outcome, such as descending below weather minima, undue clearance below radar minima, etc.”</i></p>	The risk of cognitive errors (e.g. flaps vs LG) should be added
15	6.1.1.5	119	<p><i>“Smoke or fumes, whether they are associated with fire or not, can lead to passenger and crew incapacitation and will certainly raise concern and invite a response. Even when they do not give rise to a safety impact, they can give rise to concerns and need to be addressed.”</i></p> <p>Aircraft environment as key safety risk areas could be renamed to be more specific to what safety threat(s) we consider (smoke & fumes). And considering also that environment is a term used to define one of the four</p>	Rename this paragraph by Smoke & Fumes

key drivers of EPAS document. So this can be confusing

16	14. Unmanned Aircraft Systems	14	201	The title of the previous chapter 5.5.1 ‘Civil drones (Unmanned Aircraft System’) has been changed into ‘Unmanned Aircraft Systems’ while the term ‘drone’ is still used within paragraph 15. As the terminology ‘Unmanned Aerial Vehicle’ is often used when talking about ‘drone’, it could be useful to explain/clarify all these terms.	It is suggested to add the definition of ‘drone’ vs ‘UAV-Unmanned Aerial Vehicle’ vs ‘UAS-Unmanned Aircraft System’.
17	15. New technologies and concepts	15	206	Considering a dedicated sub-chapter related to SESAR deployment (15.3) only in this chapter 15 could be misleading as SESAR (Single European Sky ATM Research) is a transverse topic related to a lot of other topics at the ATM domain level e.g. 12 Aerodromes, 14 Unmanned Aircraft Systems. Reading the Table of Contents in Page 5, it looks as if ‘SESAR deployment’ concerns only chapter 15.	Either create a specific global chapter related to SESAR or duplicate in each relevant chapter a sub-chapter like 15.3 (with customized wording depending on the topic)
18	15. New technologies and concepts	15.3	211	There is an emerging threat linked to application or use of multi-media (e.g. You Tube Video) that may have a detrimental effect on safety of flight or personnel involved in maintenance actions especially if information provided via multi-media format is not accurate as not validated by aircraft manufacturers. This emerging threat linked to the use of new technologies is not addressed in the EPAS by EASA.	It is suggested to mention this emerging threat and to act upon through Safety Promotion enabler.
19	Appendix B: Deliverables expected in 2020	Appendix B	227	The content of last column (Baseline Quarter) is difficult to understand.	Revise the table to provide the information of the target per RMT
20	Appendix F		236	It would be more readable and useful to put the “Acronyms and definitions” at the beginning of the EPAS as it is already done for the last issue of GASP and Annex19 documents of the ICAO.	Put the “Acronyms and definitions” at the beginning of the EPAS
21	Appendix F: Acronyms and definitions	Appendix F	245	Review the complete list to show the acronyms.	Revise the table with e.g. SMS Safety Management System (instead of safety management system).
22	5.3	5.5.3	95	There has been no more Rulemaking Task for several years to update the current Maintenance Training Regulation. This is critical because in the meantime on one hand the rules are outdated and with mistakes and on the other hand technology improved significantly. The long lead-time needed building up competence seen in context with the shortage on maintenance personnel increases the need to improve the rules to an up to date modern standard for better training and asks for immediate action.	The DM.TEC request is therefore to proceed with the opinion related to the RMT.0281 and to forward it to the Commission for implementation. This to allow realization of already defined and agreed improvements in regulations and training content

Reminder on the RMT.0281 New Training/Teaching Technologies:

Target is to set up the framework for:

1. e-learning and distance learning;
2. simulation devices or STDs;
3. specialised training such as HF, FTS, continuation training; and
4. Blended teaching methods.

The RMT started in 2012 and was completed, following the full EASA rulemaking procedures including CRD, in 2016.

- The text for the Opinion was ready in March 2017 (following the text agreed by the working group)
- However, the publication of the Opinion was held until the Commission adopted the rule for B2L and L licences, which has been published in 2018 but disregarding the RMT.0281 results
- In EPAS 2018-2022 the RMT was scheduled for 2021 but in the EPAS 2019-2023 the RMT has been even de-prioritized
- Now in the EPAS 2020-2024 it is published that the results of RMT.0281 are planned to be merged into RMT.0544 and RMT.0255
- To include RMT.0281 in the new RMT's will delay the urgently needed improvement in aviation maintenance training critically
- At the same time, it increases the workload and complexity of the new RMT's significantly
- In the meantime, the industry has to face shortage of qualified personnel on one side and rigid inappropriate rules on the other side
- The normal rulemaking process runs, if perfectly managed, 4 years until NPA, than plus 1 Year for CRD and opinion and plus 1 year for execution and transfer

Considering the basic qualification duration (2-4 years) the first newly qualified personnel based on an updated regulation will be available in approximately 8 to 10 years as earliest time.

without any further delay.

Consequently, the industry would be able to build up newly qualified workforce and NAA to approve the improved qualification path with new technologies.

23	5.3	5.3.3	94-96	<p>RMT.0255 Miscellaneous of Part 66 and RMT.0544 Review of Part-147</p> <ul style="list-style-type: none"> • Both tasks are in the rulemaking program since 2014 and were originally scheduled to be finished in 2017 • The ToR RMT.0255 (MDM.059) have been published 14/07/2014 already but the RMT was not started • In EPAS 2019-2023, RMT.0255 was scheduled for 2019 Q1 again • ToR RMT.0544 was not published at all and according EPAS 2019-2023 scheduled for 2019 Q1 • In the meantime a survey and a PIA on these topics have been initiated • Finally on Friday 21st June the “Draft ToR RMT.0544 'Review of Part-147' Issue 1” is available for consultation in the EUSurvey tool • The time frame for comments and nominations for the rulemaking group through the survey is scheduled till 12 July 2019. 	<p>The DM.TEC request is therefore to assure that the rulemaking task concerning Part-147 (RMT.0544) and Part-66 (RMT.0255) will be finally executed as indicated in the current EPAS. RMT.0255 and RMT.0544 must be combined in a unique working group.</p>
24	9. Design and Production	9	151-178	<p>This chapter provides the status and the updated plan of the different RMT impacting the Design and the Production. There are some preliminary tasks not yet concretised by dedicated RMT that should also be highlighted in the EPAS. For the certification of Aeronautical Electronic Hardware (AEH) and Software (SW) for avionics, these preliminary tasks are those carried out jointly by EASA/FAA/Industry for streamlining and harmonization purpose (e.g. “Abstract Layer” task for the retrieval of High Level objective of DO178C & DO254).</p>	<p>The DM.TEC suggest to highlight preliminary tasks not yet moved into RMT but engaging resources on EASA and Industry sides to develop and agree dedicated roadmaps.</p>
25	9. Design and Production	9	151-178	<p>The item Non-Installed Equipment introduced in the §3.3.2 BR Roadmap is not developed in the Volume II.</p>	<p>The DM.TEC request EASA to rework the Volume II to highlight the work plan for NIE.</p>
26	Volume II			<p>The international cooperation is defined as a strategic enabler in §3.2 but few information is given in the EPAS about the main topics/gaps to address in the frame of working arrangement discussions with other AAs (e.g. the FAA PMA system without equivalent in EU and the its validation principle)</p>	<p>The DM.TEC request EASA to add in the EPAS a synthesis of the main topics to be addressed in the working arrangement with the associated roadmap.</p>