

EASA Advisory Board

European Aviation Safety Agency

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2nd December 2015

EAB00108

Mr Patrick Ky
EASA Executive Director
European Aviation Safety Agency
Cologne, Germany

Subject: EASA Proposed Action Plan following Germanwings 4U9525 accident

Dear Patrick,

The EASA Advisory Board would like to comment on the recently published Action plan for the implementation of the Germanwings 4U9525 Task Force recommendations, its instruments and the time-frame for the implementation.

Whilst we recognise the importance of this issue and commend EASA and the European Commission's focus on this issue with the Task Force, we do have concerns about the proposed very ambitious time-frame and unprecedented usage of new "innovative solutions" that are to "guarantee a timely implementation" of the Action Plan by the end of 2016. In particular, the – so far untested – Operational Directives that may be drafted, based on the EASA Aircrew Medical Fitness Workshop and following focussed consultations, should not become a 'test-tool' to be tried out on the complex issues related to the Germanwings 4U9525 tragedy.

The Advisory Board welcomes the organisation of Air Crew Medical Fitness Workshop, on 7-8 December as a matter of stakeholder consultation. However, the implementation steps are fitted into a very short time-frame, with all rulemaking tasks proposed to be part of fast-track processes. This creates the risk of insufficient stakeholder consultation on measures that will directly impact airlines, crews and aero-medical examiners. Also, the Action Plan mentions Impact Assessments but it is unclear when and how these would be carried out within the given fast-track logic, and whether there will be sufficient time for the Agency to conduct it and for stakeholders to input.

Taking regulatory or operational actions before the final accident investigation report is published creates the risk that such actions are not adequate to address the causes of this accident. We are confident that a thorough investigation according to well established European and international procedures will allow the Agency to correct actions already taken.

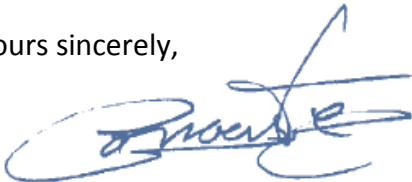
Finally, following the accident EASA issued SIB 2015-04, which recommends airlines to ensure that at least two crew members, including at least one qualified pilot, are in the flight crew compartment at

all times of the flight. As part of the planned EASA evaluation in Q2 2016, the EAB recommends that EASA reconsiders this prescriptive recommendation and allow the management of the security of the cockpit to be determined by each individual operator, as part of their Safety Management System, in agreement with the relevant national authority.

In conclusion we consider the Agency's 'fast-track' approach as problematic and recommend that EASA consults experts in coordination with the representative European Associations to ensure the risks of these approaches are fully assessed with all relevant stakeholders.

I look forward to hearing your views on this issue.

Yours sincerely,



Gilles Garrouste
Chairman, EASA Advisory Board

Copy to:

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