

Consultation of draft EPAS Vol. II 2025

MAB & SAB Workshop

17 October 2024

EASA - Safety Programmes Section

Michael Gerhard



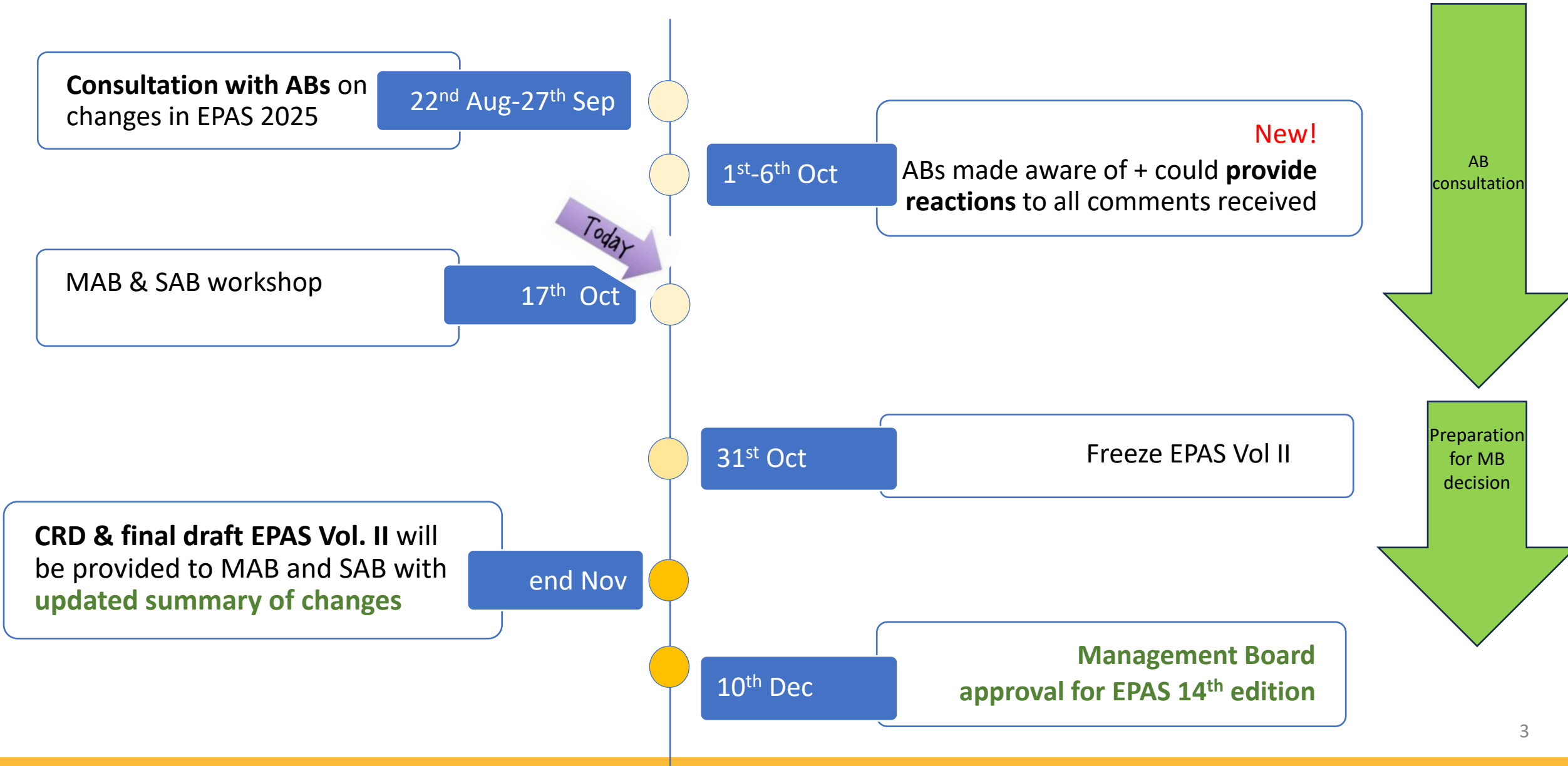
The WS will be recorded for internal purposes only



- Conclude the consultation of MAB/SAB on draft 2025 edition of EPAS Vol. II
 - stage 3 of the 2025 consultation mechanism
 - discuss relevant comments from stages 1 (written consultation) and 2 (reaction to other members comments)
 - seek the opinion / advice from MAB and SAB as a plenary (or identify trends and proportions) on selected comments
- Inform how EASA will address comments that are not directly relevant for the 2025 edition of EPAS
 - proposals for new action
 - comments and advice on the implementation of actions
- Seek feedback and advice on the consultation method and means applied this year



Towards EPAS Volume II 2025 edition

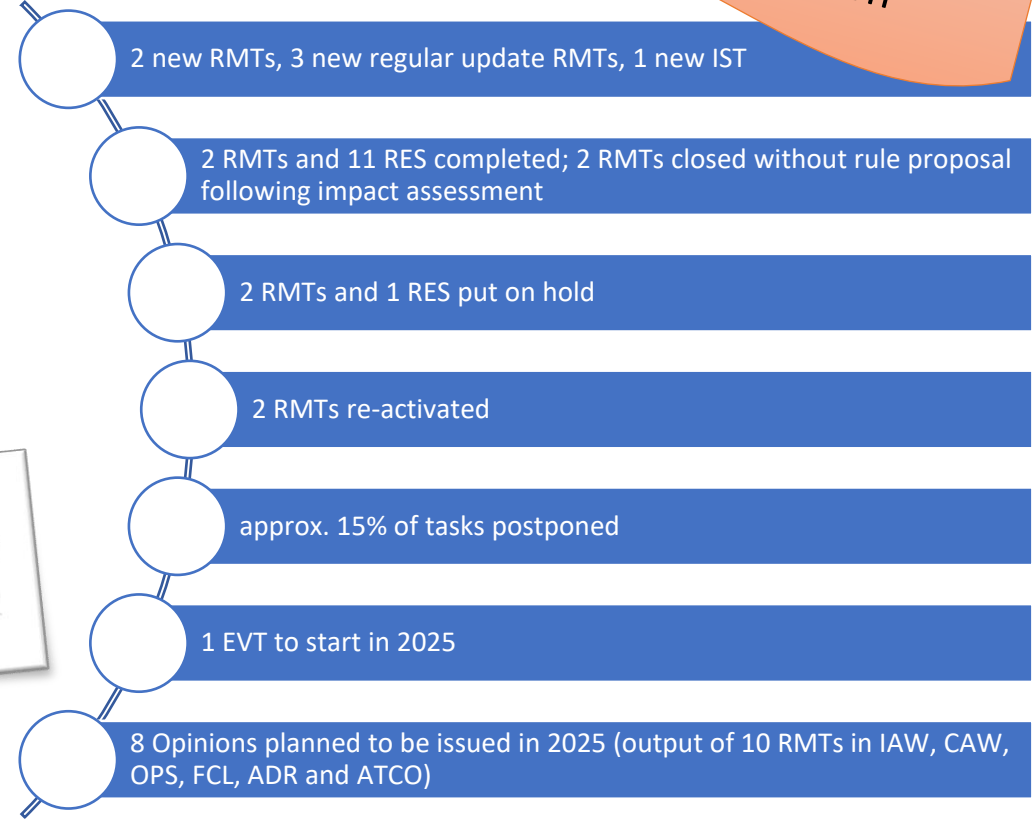


What is new in EPAS 2025 Vol II

- Rulemaking programme has been revisited in view of
 - strategic priorities,
 - existing resource constraints and
 - AB feedback that the programme overcharges the system
- Capacity is being freed up to allow work on 'simplification of rules' and to anticipate rulemaking needs to support the SESAR deployment
- Vol. II will better highlight the top safety themes (tdb.)



status of draft submitted to consultation



Comments and reactions received

168 comments received	59 reactions received
from 24 members	from 4 members

Comment category	#	%
timeline, working method, scope	65	39%
positive feedback & noted	37	22%
conceptual/strategic advice	25	15%
clarification requested	25	15%
editorial	5	3%
Suggested new actions	11	7%
Grand total	168	100%

most commented actions		
Reference	Title	#
RMT.0739 & SPT.0101	Introduction of extended minimum-crew operations (eMCO)	10
RMT.0494	FTL rules for helicopter commercial operations	8
RMT.0194	Modernisation and simplification of the European pilot licensing and training system and improvement of the supply of competent flight instructors	6
RMT.0230	Introduction of a regulatory framework for the operation of drones	6
RMT.0424	Regular update of Part-MED	6
RMT.0318	Single-engine helicopter operations	5
RMT.0706	Update of the authority and organisation requirements	5
RMT.0753 & IST.0001	Regular update of Regulations (EU) 2023/203 (Part-IS) and 2022/1645 and associated AMC&GM	4

Topics selected by EASA for discussion today

1. RMT.0230
2. RMT.0424
3. RMT.0494
4. RMT.0706
5. RMT.0739
6. IST.0001
7. Other points (CAW)
8. New actions proposed
9. Other comments

Selection criteria

- updates / changes to the consultation file
- actions that trigger most comments/reactions
- actions that triggered conflicting advice
- comments where EASA is interested to seek the opinion of the MAB and SAB as a plenary feedback
- where a comment suggested to discuss @WS
- comments where clarification is needed

Additional topics MAB/SAB members wish to discuss today?

1. RMT.0194

RMT.0230 Introduction of a regulatory framework for the operation of drones

Summary of comments

- Postponement of several deliverables by 3 years not supported
- Timelines not matching drones strategy 2.0
- Clarifications on subtasks needed, incl link to RMT.0731

- Postponement of subtask to ensure realistic planning
 - In view of overall priorities and available resources
 - Being conscious that it does not match the timelines of the drones strategy 2.0
- If MAB/SAB advice not to postpone, which other task(s) are advised to be de-prioritised instead?

RMT.0424 Regular update of Part-MED

Questions on next steps on age limits

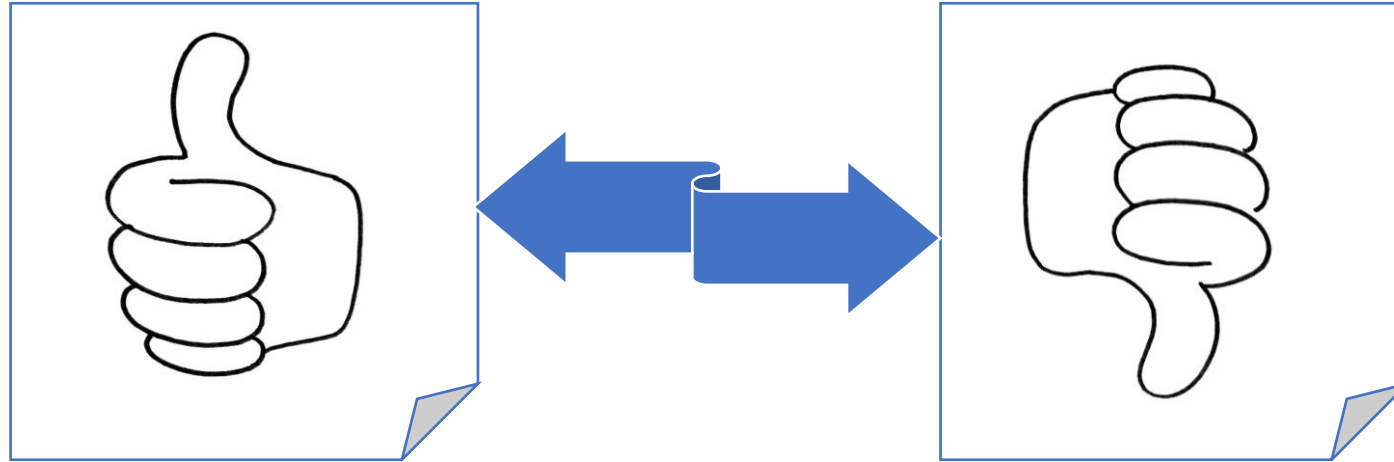
- How will data collection take place regarding extension of age limit to non-HEMS operation?
- How will EASA continue to work on this ?

- requirement for mandatory reporting to EASA of aggregated health data inserted in the Aircrew Regulation (amending Regulation 2024/2076)
- EASA will collect and analyse the data received for at least 3 years (2025,2026 &2027)
- based on that we may take decision to propose changes to the current age limits, giving proper consideration to ICAO standards and the approach of international partners
- would MS like to be involved to analyse reports from the competent authorities? Should we consider this as a MST in EPAS?

To see the overview of the Best Intervention Strategies (BISs) go to Appendix F of [EPAS 2024 Vol II](#) (p. 244)

RMT.0494 FTL rules for helicopter commercial operations

→ RMT put on hold in order to not overcharge the system



→ Topic was discussed at last week's RCOMM

 Related comment of general nature: recommendation to promote alternative (safety) measures if a RMT is put on hold

RMT.0706 Update of the authority and organisation requirements

Summary of comments

- Unclear status
- Raising potential of harmonisation of ARx and ORx for increased efficiency of SMS

→ Clarification

- RMT was on hold until 2023. In 2024 edition changed to 'ongoing'
 - Reasons: a subtask has been created for the transposition of the next amendment of Annex 19; timelines are still 'tbd'
- ## → Future subtasks depending on rulemaking need identified, impacts assessed and actions prioritised
- currently ongoing assessment and discussion with SM.TeB and SAB to gain implementation feedback / experience
 - one potential topic: safety manager
 - need for and impact of more systematic review of the AR and OR, or parts of it, currently being discussed with MAB/SAB (e.g. at workshop on 6 Nov 2024)

RMT.739 Introduction of eMCO (and link to SPT.0101)

Summary of comments

- questions on clarification of timelines and when EASA will revisit the timelines
- dependency on research tasks
- Safety promotion premature at this stage
- safety objectives intended to be achieved

- RMT part of a larger programme, incl. product certification projects, research and safety promotion
 - proposals intended to be developed on the RMT are dependent on those parts, too
- EASA currently revisits the eMCO programme and as part of that the timelines of this RMT
 - comments received here are helpful to consider
- Completion of review of the programme may not be in time for the editorial deadline of EPAS 2025 edition
 - EASA will consult the ABs on the timelines of the RMT, if and once they may amended

IST.0001 - Supporting the implementation of the ISMS

Summary of comments

- Extension of IST project to 2026 questioned in view of applicability date of the Regulations 10/25 and 2/26

- Support to NAAs on track
 - Part IS TF deliverables
 - NAAs workshops
- Training of EASA inspectors delayed due to resource issues
 - mitigation actions put in place
- Implementation support projects extended to provide implementation support (and plan resources for it) also in 2026

Other points (all related to CAW actions)

- 1 comment (and a supportive reaction) proposing to advance RMT.0097 (functions of B1 and B2 support staff and responsibilities)
 - Justification for comment understood
 - Support by a majority of MAB/SAB members? If so, which other task(s) are advised to be de-prioritised instead?
- EASA proposal to integrate RMT.0096 (Amendments in line with the process of granting foreign Part-145 approvals) with RMT.0735 (regular update of the CAW Regulation)
 - Supported by comments
 - FR asked to discuss at WS
- 1 supportive and 1 non-supportive comment received on the amended timelines of RMT.0735
- a number of comments calling in general for prioritization of CAW actions in the area of EASA strategic priority 'competence of personnel'
 - EASA has planned the tasks in accordance with the strategic priorities and available resources
 - If tasks to be accelerated, which other task(s) are advised to be de-prioritised instead?

New actions proposed to be included in EPAS

For example

- from ongoing issue assessments (parachute operations; training effectiveness and competence; CBTA; PBN / GNSS interference)
- (new) issues proposed
 - for RM (criteria for qualification of cabin crew instructors / examiners; functioning of flight dispatchers; use of digital solutions in the cockpit) or
 - for IS (FSTD requirements)
- stemming from other fora which may trigger EASA action (ATM MP, AZEA, European Runway Safety Roadmap)



some proposals received conflicting reaction by other AB members

→ issues which are not yet under assessment will be assessed (e.g. via the SRM process) whether and when action to be included in EPAS



be reminded you can make such comments at any time throughout the year

be reminded that MAB/SAB are being consulted on proposed new actions following a BIS, or via EPAS consultation

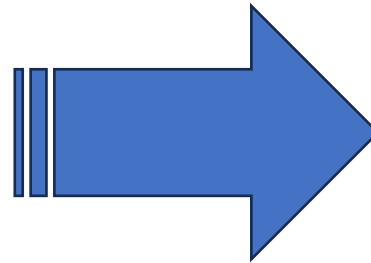
→ recommendations or proposed actions from other fora will also be assessed and prioritized as soon as available

→ assessments completed by approx. August can be reflected in the upcoming EPAS edition

→ ongoing issue assessments (e.g. in the SRM process) will be included once the need for action is decided (based on SIA/BIS) and action is prioritised

Other comments not directly affecting the EPAS 2025 edition

- Comments, proposals, questions on the scope of the task
- Requests to contribute or to be involved in a task, e.g. as member of a rulemaking group
-



- Will be addressed under the task
- Will be shared with the respective project manager
- You shall receive a feedback through our responses to your comments

Consultation process, timeline & format

- Feedback on new stage 2 (possibility to react to other members comments)
- Potential amendment of the consultation timeline?
- Feedback on database-based consultation tools



Thank you

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