

The golden rules for sound and effective Safety Recommendations

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Your safety is our mission.

Introduction

The lessons learned we can get from a safety investigation are shared through **two complementary** tools:

- **The Final Report**, which must be issued timely and made publicly available
- **The Safety Recommendations (SRs)**

The Final Report is for the entire aviation community, while Safety Recommendations have clear addressees

Introduction

- If the Final Report marks the end of the investigation, **the SR is the start of a dialogue between the AIB and the addressee**
- This dialogue should start before the formal issuance, with a **preliminary drafting and consultation of the addressee**
- The SR is **not a message to the wind!**
- **The dialogue should conclude with an AIB assessment of the action taken (or not taken for motivated reasons) by the addressee.**

Some practical advice

- **Each** single **SR** should **be conceived as a “stand alone” document**, with no need to reference to the FR
- **Efficient numbering** is essential for any further communication with the addressee
- Make it unique and simple at the same time, being independent of the investigation and the addressee:
 - This will help an **easy archiving**
 - It will help in any correspondence

e.g.: AIBxyz/YEAR/progressive number

How to make a SR effective

The drafting should put emphasis on the importance of **narrowing the scope**, being **realistic** and **proportionate** as well as **succinct**.

The SR should be “*SMART*”:

Specific, Measurable, Achievable, Relevant and Timely.

How to make a SR effective

- **Specific**, *the SR should be clear and concise (avoid generic expressions like “increase safety”)*
- **Measurable**, *to be able to track progress or confirm completion*
 - ✓ This implies that **each SR** should be univocally linked **to one single addressee** (*otherwise impossible to keep track of the progresses made by the different parties!*)
 - ✓ **In case of multiple stakeholders** required as potential contributors to solve the safety issue, **always identify one single main addressee** and list the others as additional players.

Few examples: *“It is recommended to EASA...*

that ..., in conjunction with the TCH, amend the AFM”

that..., in coordination with the TCH, take the necessary measures to...”

that ..., in cooperation with the primary certification authority, ascertain that TCH renders the syllabus for the acquisition of the type rating more precisely to the effect that ...”

that..., in coordination with the TCH and with the other primary certification authorities, examine whether other TCs are affected by this issue”

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But, could it work better to have different SRs to different addressees with interlinks?

For example:

- *“to recommend the TCH to evaluate a possible technical amendment”*

and, through a different SR

- *“to ask the Regulator to follow-up this activity and evaluate its possible implementation”*

How to make a SR effective

- **Specific**, the SR should be **clear and concise** (avoid generic expressions like “increase safety”)
- **Measurable**, to be able **to track progress** or confirm completion
- **Achievable**, the SR must be **realistic** given available resources, time, and constraints
- **Relevant**, the action should **directly address the identified risk**
- **Timely**, to make it **tied to a clear and appropriate timeframe** for action

The need of an early dialogue

- The **AIBs** are in the best position to **identify the root causes** of the event **and the risks of re-occurrence** in absence of mitigations, however:
 - ***Rarely*** they have the **technical background to identify all possible mitigations** to address those risks
 - ***By default***, they are looking selectively at the absolute value of safety and **not asked to compare the possible mitigations in terms of cost/benefits**
- So, a sound **SR** requires to **be discussed in advance** with the addressee to **ensure it is *Relevant and Achievable***

The follow-up to SR

- Regulation (EU) 996/2010 “on the investigation and prevention of accidents and incidents in civil aviation” - Art. 15 **and SRs database:**
 1. **The addressee ... shall acknowledge the AIB... within 90 days ... of the actions taken or undertaken, appropriate, of the time necessary for their implementation. When an action is taken, the reasons therefore.**
 2. **Within 60 days of the date of the SR, the AIB shall inform the addressee whether or not it has taken any action and give justification when it has not taken any action.**
 3. Each AIB shall ensure to record the responses to the SRs it issued.
 4. **Each entity, including the CAAs of the MS and EASA, shall implement procedures to monitor the progress of the action taken in response to the SRs received.**

Going beyond the requirements established by ICAO Annex 13

The follow-up to SR

**Safety Recommendation Information System (SRIS),
in place since January 2012**

5. ***AIBs shall record in the central repository*** established under Commission Regulation (EC) No 1321/2007 ... ***all SRs issued ... as well as the responses thereto. AIBs shall similarly record in the central repository all SRs received from third countries.***

**Specific task carried out by EASA for SRs addressed to EASA
or the European Commission**

How we deal with SRs at EASA

- *The entire process is administrated by the Safety Investigation & Reporting Section.*
- *At receipt, each SR is individually allocated at a Responsible Unit (RU) depending on the topic.*



Proposal replies are provided by the RUs and jointly discussed at Internal Safety Investigation Response Committee (ISIRC) meetings



ISIRC meetings every 6 weeks to approve the proposed replies. Participants from all the involved EASA departments. First reply to be approved within 90 days.

How we deal with SRs at EASA

- In accordance with the harmonized approach within the EU established by ENCASIA WG6, a specific taxonomy is used for the status and the assessment of the SRs and their replies*

For AIB & Addressee

Status of the SR
Open
Closed

For Addressee only

Assessment of the SR
Agreement
Partial agreement
Disagreement

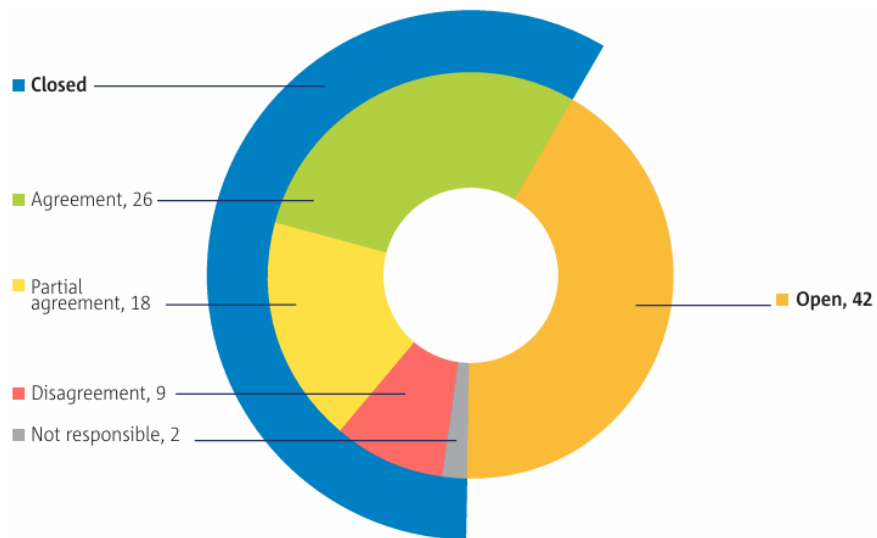
For AIBs only

Assessment of the Reply to the SR
Adequate
Partially adequate
Not Adequate

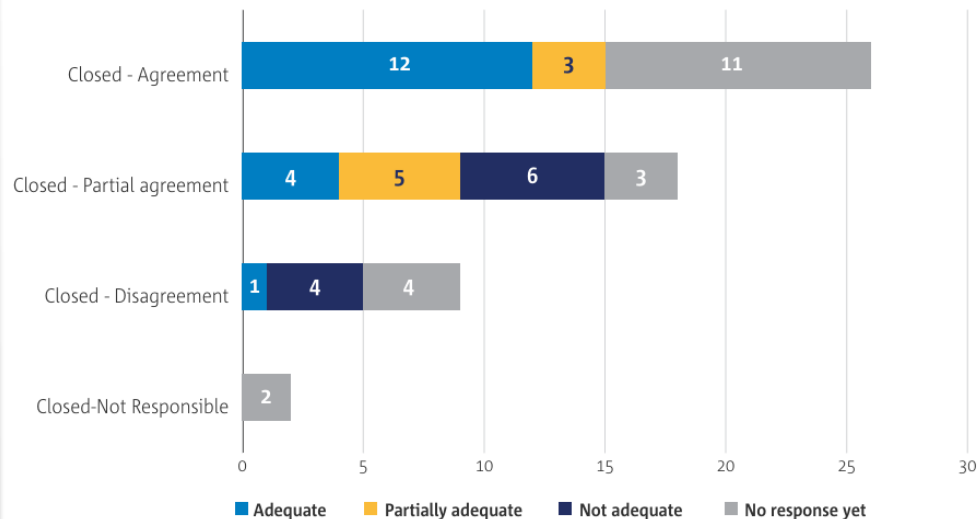
- Status** of SR kept **“Open”** until expected **action is completed**
- Assessment of SR** only provided with **“closing”** replies
- Replies** to SRs made **publicly available** (issuance of quarterly reports to CAAs and AIBs of the EU and yearly publication of the **ASRR**)

How we deal with SRs at EASA

Distribution of SR replies sent by EASA (source: ASRR 2025)



AIB assessment of replies sent by EASA (source: ASRR 2025)



The term “closed” used in this slide refers to the status iaw EASA assessment

How we deal with SRs at EASA

- Best scenario: the status of the SR is defined as “*Closed*” by both addressee and AIB, and the final reply is assessed as “*Adequate*” by the AIB
- What if the AIB assesses the final reply as “*Not Adequate*”?



The AIB should provide the rationale for this negative assessment and keep the SR status as “*Open*”.

Under this condition, **EASA would** go through an additional iteration of the process and **deliver an update reply**, reviewing or confirming the previous position, in both cases **with further justification**.

Final landing of the dialogue

- Final status of the SR always officially defined by the AIB
 - It may be “*closed*” also in presence of *remaining disagreement*, but only at the end of an open and constructive dialogue
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- *Is that all?*

No, because **analysis of the SRs** is a powerful tool **used by EASA to identify and rank safety issues** in the framework of the Safety Risk Management (SRM) process.

At this aim, EASA considers the full batch of SRs received, not only those on which it was agreed to take actions (*e.g.: Erroneous Takeoff Parameters*)

Final Remarks

- In the effort to **early identify systemic risks and share critical safety lessons globally**, ICAO defines as Safety Recommendations of Global Concern (SRGC) **those SRs that are considered to have implications beyond the State of occurrence, and which may require action at an international level to improve aviation safety** (*e.g. some SRs related to the B737 MAX investigation*)
- **SRGCs are specifically tracked in SRIS, similarly to those that are considered of EU relevance (SRUR)**
- **SRs can be issued any time in the course of the investigation, as soon as a safety issue is identified** ➡ **No need to wait for the publication of the FR**
- **SRs can also be issued by the SIA as the result of a study, for example on a batch of similar occurrences.**



Thank you!

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