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Title	Enhancement of the safety assessment processes for rotorcraft designs
NPA Number	NPA 2021-11

UK CAA (European.Affairs@caa.co.uk) has placed **6** unique comments on this NPA:

Cmt:	Segment description	Page	Comment	Attachments
70	(General Comments)	0	<p>Page Number: General comment</p> <p>Comment:</p> <p>It is implied (by the mention of 'state of the art' in a number of places) that safety assessment methods have somehow taken a leap forward, but this is not explained or substantiated. Any meaningful safety assessment must ultimately be based on failure rates and consequences. It is therefore unclear what changes could have taken place that would justify the proposals.</p> <p>Justification:</p> <p>It is proposed that only substantiated claims are used as a basis for rule changes.</p> <p>Proposed Text:</p> <p>It is advised to either explain and substantiate the assertion or remove it.</p>	
71	(General Comments)	0	<p>Page Number: General comment</p> <p>Paragraph No: General</p> <p>Comment:</p> <p>It is suggested that safety assessment requirements are standing in the way of the introduction of safety enhancing technologies, but no examples or evidence is presented.</p> <p>Justification:</p> <p>It is proposed that only substantiated claims are used as a basis for rule changes.</p> <p>Proposed Text:</p> <p>Specific examples should be presented in the NPA. This could include experience from fixed wing counterparts which this proposal seeks to align with, should there be corresponding changes resulting in the introduction of new, safety enhancing equipment/systems that have been demonstrated to be effective.</p>	

Cmt:	Segment description	Page	Comment	Attachments
72	(General Comments)	0	<p>Page No: General</p> <p>Paragraph No: General</p> <p>Comment:</p> <p>It is fairly certain that the weakening of the safety assessment regime will reduce costs to aircraft manufacturers, but there is no guarantee that it will lead to the introduction of safety enhancing technology. On the contrary, it could result only in a watering down of safety standards.</p> <p>Justification:</p> <p>The CAA considers it irrational and unwise to risk reducing safety standards (which are arguably already too low - hence EHEST, the UK CAA's onshore review (CAP 1864) and other more recent initiatives) based on the hope that a heavily cost-driven industry will voluntarily introduce safety enhancements that will increase the cost of their products.</p> <p>Proposed Text:</p> <p>The CAA recommends introducing cost-effective safety enhancements to counterbalance any weakening of the rules to ensure that overall safety is at least maintained and, preferably, improved.</p> <p>Alternatively, consideration should be given to reconfiguring the rules such that safety enhancements are reviewed on a case-by-case basis whereby the safety assessment criteria are relaxed only where an overall safety enhancement can be demonstrated.</p>	
73	(General Comments)	0	<p>Page No: General</p> <p>Paragraph No: General</p> <p>Comment:</p> <p>The NPA does not discriminate between different uses of the aircraft. Lower standards may be acceptable for GA but arguably not for CAT operations.</p> <p>Justification:</p> <p>Precedents exist for higher standards being required for CAT operations relative to GA.</p> <p>Proposed Text:</p> <p>It is recommended the NPA should consider applying the safety continuum concept to the type of operation for which the aircraft is to be used.</p>	

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74	AMC 27.1309 Equipment, systems, and installations	10	<p>Page No: 10 and 17</p> <p>Paragraph No: CS 27.1309(a) and CS 29.1309(a)</p> <p>Comment:</p> <p>Although the majority of changes specified in this NPA are there to bring CS-27 in line with the changes that have already been made to the other CS documents, it would be beneficial to note that some of the changes could be subject to misinterpretation or an overly narrow interpretation. This could result in a potential degradation of safety. An example of this is the change of wording to 1309(a). The previous text required equipment, systems and installations to perform their intended functions “under any foreseeable operating condition”. The new text requires that they perform their intended functions “throughout the operating and environmental limits for which the rotorcraft is certified”.</p> <p><u>Justification:</u></p> <p>It is possible that some entirely foreseeable types of failure condition, human error or simple bad luck (e.g., the need for rapid manoeuvres to avoid mid-air collision) could drive the rotorcraft outside the operating and environmental limits to which it was certificated.</p> <p>Proposed Text:</p> <p>Additional guidance regarding the interpretation of such statements should be considered.</p>	

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75	AMC 29.1309 Equipment, systems, and installations	17	<p>Page No: 10 and 17</p> <p>Paragraph No: CS 27.1309(a) and CS 29.1309(a)</p> <p>Comment:</p> <p>Although the majority of changes specified in this NPA are there to bring CS-27 in line with the changes that have already been made to the other CS documents, it would be beneficial to note that some of the changes could be subject to misinterpretation or an overly narrow interpretation. This could result in a potential degradation of safety. An example of this is the change of wording to 1309(a). The previous text required equipment, systems and installations to perform their intended functions “under any foreseeable operating condition”. The new text requires that they perform their intended functions “throughout the operating and environmental limits for which the rotorcraft is certified”.</p> <p><u>Justification:</u></p> <p>It is possible that some entirely foreseeable types of failure condition, human error or simple bad luck (e.g., the need for rapid manoeuvres to avoid mid-air collision) could drive the rotorcraft outside the operating and environmental limits to which it was certificated.</p> <p>Proposed Text:</p> <p>Additional guidance regarding the interpretation of such statements should be considered.</p>	