



ENCASIA OPINION
CONCERNING
ACCESS RIGHTS TO SAFETY RECOMMENDATIONS
INFORMATION SYSTEM (SRIS) DATABASE

On 20 March 2012, the European Commission sent a letter to the ENCASIA Chairman asking for the Network's opinion on access rights to the Safety Recommendations Information System (SRIS) Database. This opinion will be used to develop a Commission Decision on access rights.

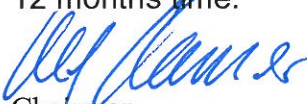
The ENCASIA opinion will discuss any restrictions that may be placed on access and the effects of any Commission Decision in terms of safety improvements and dissemination of necessary safety information.

The members of ENCASIA all agreed that this database is a welcome addition to improving aviation safety and investigations will be strengthened through accessing and referring to previously made safety recommendations. It is also recognised that currently, safety recommendations are published as part of a complete accident investigation report and this is an important difference from a database containing the safety recommendations in isolation.

ENCASIA is concerned that safety recommendations presented without the support of a complete report to the public and the media, are likely to lead to conjecture and misinterpretation, which (at best) place the submitting safety investigation authority (SIA) in a position to have to counteract (erroneous) conclusions drawn and perhaps published by the press. Organisations such as the EASA and some manufacturers who may be the subject to large numbers of recommendations could be particularly adversely criticised. There is additional concern that there is still inconsistency amongst the different ways member states formulate safety recommendations and this should be resolved before full public access is granted.

It is also noted that in recital (1) to the EU Regulation 996/2010, "all efforts should be made to reduce the number of accidents and incidents to ensure public confidence in air transport". Publishing safety recommendations in the isolation of a database may have a counter effect to this if misused by the media.

ENCASIA consider that to be fully effective, the database access should be restricted to the Safety Investigation Authorities, the EASA and the National Aviation Authorities. It is desirable that unrestricted public access should be a long term goal but there are many hurdles to overcome before that is considered practicable. In order to gain experience with working with the SRIS, it is recommended that access rights are further reviewed in 12 months time.


Chairman