European Perspective

SMS Standstill

LONDON—In the past, European regulation of aviation safety has centered on human factors and error management, but today it is focusing on safety management systems (SMS) for airlines and MROs. According to Bob Simmons, technical director at aviation safety training consultancy Baines Simmons, the move to SMS originated from changes to the International Civil Aviation Organization’s (ICAO) Standards and Recommended Practices some 6-7 years ago. Canada, some Asian states and Australia subsequently adopted SMS, but implementation in Europe has been slow. Yet perception is key, says Simmons, because the positive affects of SMS on commercial operations are not well understood.

“Many companies see it as another cost with no commercial benefit, and although they could be ‘safer,’ they don’t appreciate it because the safety problems they see are low level and therefore being dealt with within the cost of doing business or they are not experiencing accidents,” Simmons says. “Others gauge safety on the numbers of unsafe incidents or errors they suffer, and providing it’s affordable and at a low level, then it’s no real problem. But ‘safety’ is understanding how close you are to having an accident—and that margin is critical.”

In spite of safety’s criticality to business, Simmons points out that a company on a tight budget will seriously question spending $250,000 on a safety program. Even though organizations can realize huge savings by minimizing errors that cause flight diversions, delays and rework, “spending to save remains a big issue,” he says.

On the other hand, demand for training courses that move human factors and error management toward an SMS is high and rising. Indeed, two of Simmons’ major clients have recently transitioned to an SMS. “The next stage will be to make their systems more predictive and proactive, which is what all companies under EASA jurisdiction will have to do when the new regulations covering SMS are introduced in around two years’ time.”

These changes stem from EASA’s new flight operations rules, which will directly impact maintenance in the future. Initially, these consisted of umbrella Organizational Requirements (Part OR) and Authority Requirements (Part AR) that EASA also aimed to use for maintenance certification, production and design. Simmons says such a change would have benefitted MROs by rationalizing various organization approval (certification) codes. For example, today, an airline or MRO might hold separate approvals for flight operations, maintenance, continued airworthiness management, [limited] manufacturing, design and training, etc.—each with its own manager, organizational management system, manuals and quality systems.

However, the EC since has asked EASA to rewrite its new regulations without the “umbrella” Part OR and Part AR requirements. The content of these drafts now will be distributed within the various remaining parts to provide a less fragmented regulation structure. Assuming the content remains consistent, Simmons believes the intended standardization of organization certification and the cohesion between regulations should be maintained, although there could be a level of duplication that the initial proposals would have avoided.

Some EU member-state aviation authorities and organizations have expressed concerns that while ICAO’s SMS requirements are clear, EASA might have lowered their safety-related importance by placing them within general management functions. But Simmons points out that an SMS only becomes effective when it is embedded in an organization.

“It cannot be bolted-on,” he says. “A balance needs to be struck between the competing pressures of risk management and commercial survival.”

The consultation process for EASA’s proposal is complete and its recommendation has been submitted for European Parliament approval for implementation into EU law, but when that might happen is still to be resolved. As things stand, the European Council mandate states that the new Operational Requirement, including SMS, will become effective on April 8, 2012. Given this deadline, EASA has to generate the requirements and provide sufficient notice for a transition period—which made the original target date for publication of Part AR and OR April 8. But, given recent changes, the volume of comments and the complex pre-recommendation process, publication could be delayed by several months. While EU member-states wait for European Parliament approval, they fall further behind ICAO’s intended implementation date of spring 2010.

Canada, Australia, Singapore, and New Zealand have implemented ICAO’s SMS standards, and while airlines have had little problem applying them, Simmons says that some corporate and light aircraft owners have been reluctant to invest in SMS.

—BILL BURCHELL