

The Finnish Plan for Aviation Safety 2025

Finnish Aviation Safety Programme, Annex 1



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Foreword

Throughout its history of more than 120 years, aviation has captivated people with its beauty, technological innovation and spirit of adventure. Aviation holds intrinsic value and has inspired generations to develop new ideas, deepening our understanding across numerous fields from physics to human behaviour. Currently, we are experiencing a period of transition. The Russian war of aggression against Ukraine and its implications for global security policy have placed our society in an entirely new situation: preparedness, proactivity and close cooperation between relevant stakeholders have become vital. While aviation may not hold intrinsic value for the core functions of society, the services it provides are indispensable.

Finland is not an island, but our overland connections in essential directions are limited. In future, safe air transport to and from Finland – something we have taken for granted following decades of systematic safety improvements – may face new challenges. Unintentional, but also intentional and deliberate, threats are already targeting, and may increasingly target, our aviation system. We, as aviation professionals working for public authorities and aviation organisations, have long-standing experience in risk management. We have a range of tools for ensuring safety. Whether the existing tools will suffice in the face of future challenges remains to be seen. Disruptions to satellite navigation systems and the adjustments necessitated by the growing number of conflict zones are just some of the threats shaping the present – and, regrettably, have already become an everyday reality in aviation. By preparing for new threats and a changing global landscape through robust collaboration, in connection with Finland's preparedness, we secure the continued high level of aviation safety – regardless of the surprises our operating environment may hold.

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Global Aviation Safety Plan GASP (ICAO Doc 10004)								
EASA Regulation (EL	EASA Regulation (EU) 2018/1139 ¹							
The European Aviation Safety Programme								
European Plan for Av	viation Safety (EPAS)	2025						
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¹ REGULATION (EU) 2018/1139 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91

Acronyms

Acronym	Meaning		
ADR	Aerodromes		
AIR	Airworthiness		
AMO	Approved Maintenance		
	Organisation		
ANS	Air Navigation Services		
AOC	Air Operator Certificate		
ATO	Approved Training Organisation		
САМО	Continuing Airworthiness		
	Management Organisation		
CAO	Combined Airworthiness		
	Organisation		
CAT	Commercial Air Transport		
C-UAS	Counter UAS		
DGCA	Director General of Civil Aviation		
EASA	European Union Aviation Safety Agency		
EASP	European Aviation Safety Programme		
EPAS	European Plan for Aviation Safety		
Eurocontrol	European Organisation for Safety of Air Navigation		
FASP	Finnish Aviation Safety Programme		
FDM	Flight Data Monitoring		
FPAS	Finnish Plan for Aviation Safety		
FRMS	Fatigue Risk Management System		
FTL	Flight and duty time limitation		
GASP	Global Aviation Safety Plan		
GH	Ground handling		
GRF	Global Reporting Format		
ICAO	International Civil Aviation Organization		
IFALPA	International Federation of Air Line Pilots' Associations		
IS	Information Security		
ISMS	Information Security Management System		
NCC	Non-commercial air operations with complex motor-powered aircraft		
NCO	Non-commercial operations with other than complex-motor-powered		
	aircraft		
SIAP	Standardisation Inspection Annual Programme		
SMICG	Safety Management International Collaboration Group		
SMS	Safety Management System		
SPAS	State Plan for Aviation Safety		
SPI	Safety Performance Indicator		
SPO	Specialised operations		
SPN	Safety Promotion Network		
SPT	Safety Performance Target		
SSP	State Safety Programme		
SSPIA	State Safety Programme Implementation Assessment		
UAS	Unmanned Aircraft System		

1 European Plan for Aviation Safety EPAS

1.1 EPAS as part of safety management in European aviation

The commercial aviation safety situation in Europe continues to be good. Maintaining this status requires taking measures to reduce the number of accidents and prevent the annual number of fatalities from increasing from its present low level, even if the number of flights increases. Advanced safety management will also be needed when responding to potentially rapid changes in the aviation system's structures, business models and technical solutions, as well as in the context of developments like the COVID-19 pandemic, which have an adverse impact on business conditions and traffic volumes. The tools of advanced safety management allow us to identify new threats posed by such changes and respond to their attendant challenges.

The **European Plan for Aviation Safety, EPAS**, has been published since 2011. Obligations concerning the European Aviation Safety Programme and Plan as well as national aviation safety programmes and plans are included in EASA Regulation (EU) 2018/1139. These safety management obligations also apply to states under ICAO Annex 19.



Figure 1: Image by EASA (EPAS 2022–2026, vol 1), relationship between EPAS and other programmes and plans

EPAS 2025 Edition, published by EASA on 21 January 2025, is a comprehensive package of the strategic priorities and measures of aviation in Europe. EPAS consists of a strategy and performance volume published in 2023 for the threeyear period 2023–2025 (volume 1, Strategic priorities), as well as an actions volume (volume 2, EPAS actions) and a European safety risk portfolios volume (volume 3, Safety Risk Portfolios). The last two are updated annually. EPAS is also guided by the *Commission's Better Regulation agenda*², and the strategic priorities of EPAS are based on the *Commission's Aviation Strategy*³ and EASA's strategic plan. In addition to safety, EPAS also takes into account objectives and measures to increase the environmental sustainability and fluency of air transport. Strengthening the resilience of the aviation system is strongly at the forefront. Efforts have been made to harmonise the global work for maintaining and improving the performance of the air transport system. EPAS is strongly connected to the Global Aviation Safety Plan GASP⁴ and Global Air Navigation Plan GANP⁵ published by ICAO and also takes into account other relevant regional plans and strategic papers, including *The ATM Master Plan⁶* and the *Report of the Wise* Persons Group on the future of the Single European Sky⁷. EPAS is also the Regional Aviation Safety Plan (RASP) required by ICAO for EASA Member States. ICAO and EASA cooperate in producing an EUR RASP for the EPAS and EUR region.

In the context of safety, EPAS includes **identified key risks in aviation at the European level, strategic safety objectives and actions** for achieving these, and takes into account the global objectives defined by GASP.



 $^{^2\} https://commission.europa.eu/law/law-making-process/planning-and-proposing-law/better-regulation_en$

³ https://ec.europa.eu/commission/presscorner/detail/en/IP_17_1552

⁴ https://www.icao.int/safety/GASP/Pages/Home.aspx

⁵ https://www4.icao.int/ganpportal

⁶ https://www.atmmasterplan.eu/

⁷ https://ec.europa.eu/transport/modes/air/news/2019-04-15-recommendations-on-air-traffic-management-in-europe_en

Figure 2 (p. 11): Image by EASA (EPAS 2025, vol 3), European-level SRM process principle



Figure 3: Image by EASA (EPAS 2025, vol 3), European-level SRM process principle – categorisation of assessed safety themes

The safety-related content of EPAS is produced as part of EASA's Safety Risk Management process (SRM). Within the framework of its SRM process, EASA coordinates the identification of key safety risks in European aviation, and the creation and maintenance of the European Safety Risk Portfolio. Through the forums of this process that progresses following an annual cycle, Member States and aviation stakeholders can participate in and influence European aviation risk management. Themes or actions can also be proposed for EPAS directly at any time of year using the *Candidate Issue Identification form*⁸. The actions defined as the result of this process are published annually in EPAS and implemented in a coordinated manner at the European level and nationally.

The actions contained in EPAS seek to influence **systemic and operational safety** in commercial air transport and general aviation. These actions concern manned aviation with aeroplanes and helicopters and unmanned aviation. They are also a means to prepare for **changes in the aviation system or operating environment.** While changes, such as new technologies or operating models, bring benefits, they can also introduce new threats. Well-functioning safety management structures **strengthen the resilience of Finland's aviation system** to threats and changes in the system and operating environment, and

⁸ https://www.easa.europa.eu/rulemaking-proposal-candidate-issue-identification-form

ensure that these are safely integrated into the aviation system in a proactive manner.

The actions included in EPAS, i.e. the range of tools for improving safety, can be divided into six categories: **safety promotion, oversight capabilities and focus areas, regulation, implementation support tasks, research** and **evaluation**. Tasks assigned to Member States may include tasks to reinforce safety promotion, supervision and/or safety management. The most appropriate means of safety management is chosen for each action. Actions assigned to Member States are divided into safety promotion, maintaining and improving oversight capabilities and oversight focus areas.



Figure 4: Image by EASA: Prioritisations of EPAS actions

The actions defined in EPAS are assigned to EASA, the European Commission, Member States and various networks and groups that participate in EASA's SRM process as well as various working groups established for the actions.

Finland includes EPAS actions assigned to Member States in the Finnish Plan for Aviation Safety. Aviation stakeholders must process, document and implement the actions where applicable. Traficom supervises the processing and implementation of the actions and reports to EASA annually on their progress.

The European Aviation Safety Programme and Safety Plan can be accessed at <u>EASA's safety management website</u> and <u>Traficom's aviation safety management</u> <u>website</u>.



Figure 5: Roles and responsibilities in aviation safety management in Finland.

2 Finnish Plan for Aviation Safety

2.1 Role of the Safety Plan in Finnish aviation safety management

The Finnish Aviation Safety Programme (*FASP*) describes the national aviation safety management system. It contains the aviation safety policy and a high-level description of the legislative framework, processes and safety work. By maintaining FASP, Finland fulfils the obligations concerning a national safety programme laid down in Article 7 of Regulation (EU) 2018/1139 on the competence of EASA.

The Finnish Plan for Aviation Safety (*FPAS*) is appended to the Safety Programme as Annex 1. It describes key safety risks for Finnish aviation identified through European and national safety risk management, the specified strategic safety objectives and the actions taken to achieve them (*see FASP, section 2.6*). By maintaining FPAS, Finland fulfils the obligations concerning a national safety plan laid down in Article 8 of Regulation (EU) 2018/1139 on the competence of EASA.

Finnish Aviation Safety Objectives and Safety Performance Indicators and Targets is appended to the Safety Programme as the independently published Annex 2. Specifying the national-level aviation safety performance indicators and targets, monitoring them and using the results to support decision-making are a part of ensuring safety. The indicators impose obligations on both Traficom as well as aviation organisations.

The FASP and its Annexes also comply with the ICAO requirement of establishing and maintaining a State Safety Programme (SSP).

Finland has phrased the obliging nature of the FASP and its Annexes in section 4 of the Aviation Act (864/2014) as follows:

"The Finnish Transport and Communications Agency shall prepare and validate the national safety programme referred to in Article 7 of the EASA Regulation as well as the national safety plan referred to in Article 8, taking into account the standards referred to in the Chicago Convention as well as the European Aviation Safety Programme referred to in Article 5 of the EASA Regulation and the European Plan for Aviation Safety referred to in Article 6 of the EASA Regulation.

Aviation stakeholders shall process the national aviation safety programme and the national plan for aviation safety in their own safety management."

Each aviation stakeholder is responsible for the safety of its own operations. Stakeholders must address in their Safety Management Systems the threats identified by them and those identified in the Finnish aviation safety risk management process in respect of their own operations, assess the associated risks and, if necessary, implement actions aiming to reduce risks to an acceptable level. Traficom and aviation stakeholders must process, document and implement the actions of the Finnish Plan for Aviation Safety where applicable. As part of its oversight activities, Traficom assesses how stakeholders have addressed the actions described in the FPAS and the threats relevant to them in their safety management.

The effectiveness of FPAS actions is monitored as part of Finnish aviation safety risk management and safety assurance.

The Finnish Plan for Aviation Safety is updated annually. For information on the responsibilities for maintaining the FPAS, see FASP section 1. The FPAS can be accessed on <u>Traficom's aviation safety management website</u>.

2.2 Safety Plan structure

The actions described in section 3 are divided into systemic and operational level actions addressed to a number of domains in aviation and those addressed to individual aviation domains. The objectives, parties responsible for implementation, the schedule and the status of implementation of each action are described, and an EPAS reference is given if the action is based on an EPAS action assigned to Member States. Some of the EPAS actions assigned to Member States are straightforward, while others leave it to the Member State to define the action in detail. Details of EPAS actions and nationally identified actions are defined in the Finnish aviation safety risk management process (*FASP, section 2.6*).

Appendix 1, included at the end of this document, contains a list of actions for each stakeholder group to help aviation organisations identify actions that concern them. New and deleted actions have also been marked in the list.

3 Summary of the European and Finnish safety situation underlying EPAS and FPAS

3.1 Current safety themes in EPAS

The following safety issues in different aviation domains are highlighted in the top 20 safety themes included in EPAS Volume III:

- Impact of GNSS interferences on civil aviation operations (CAT A, commercial air transport aeroplanes)
- Approach path management (CAT A)
- Icing in flight (CAT A)
- Inadvertent flight into IMC/scud running (NCO A, non-commercial specialised operations – aeroplanes)
- Risks associated with parachuting operations (NCO A)
- Unanticipated yaw/loss of tail rotor effectiveness (Rotorcraft)
- Inadequate obstacle clearance during any flight phase (Rotorcraft)
- Inadequate airborne separation under VFR operation (Rotorcraft)
- Inadvertent flight into IMC (Rotorcraft)
- Airspace infringements by military UAS, aircraft, missiles, or debris spilling over from conflict zones

Four systemic themes concerning airworthiness and maintenance are highlighted in the EPAS top 20 safety issues:

- Shortcomings in design and maintenance instructions resulting in maintenance errors
- Outdated certification bases established for major changes to type certificates
- Insufficient consideration of flight crew human factors in the continued airworthiness process of the type design
- Insufficient consideration of flight crew human factors in functional hazard assessments

For more detailed information about the status of aviation in the EU and key safety themes in various aviation domains, see <u>EPAS 2025</u>, volume III, Safety Risk <u>Portfolios</u>. EASA also publishes the EASA Annual Safety Review that provides a comprehensive review of safety performance across aviation domains in the year preceding publication. The latest version, EASA Annual Safety Review 2024, was published in July 2024 and can be accessed via <u>this link</u>.

3.2 Current safety themes in the Finnish aviation system

Traficom issues an aviation safety review twice a year. One of the reviews focuses on the state of safety during the previous year. The 2024 safety review can be accessed via <u>this link</u>. Traficom also monitors the development of safety and statistics concerning aviation and other transport sectors and produces related upto-date information and data. Situational pictures are available on the website Tieto.Traficom.fi <u>https://tieto.traficom.fi/en/situational-pictures</u> (\rightarrow Mode of Transport \rightarrow Aviation). In 2024, commercial air transport in Finland continued to be significantly affected by the war in Ukraine, as it was in 2022 and 2023. Circumnavigating conflict zones and the closure of Russian airspace for European operators caused major changes in flight routes.

The interference in satellite navigation systems that began in 2022 continued, with implications in the Finnish airspace. In the autumn, Traficom published the website <u>Satellite navigation service interference in Finland</u> that focuses on the issue in more detail. The European Union Aviation Safety Agency EASA updated its <u>Safety</u> <u>Information Bulletin</u> on the issue.

Based on the level 2 indicators for monitoring Finnish aviation safety performance (most typical factors contributing to accidents), there was an increase in the number of <u>loss of control in flight incidents that occurred abroad</u>.

4 Safety Plan actions

4.1 Systemic issues – safety management



Systemic issues, introduction

Systemic themes are issues that concern an individual organisation, a system element or the entire aviation system. Systemic actions comprehensively improve the safety level of aviation in Finland. They also maintain and reinforce the actions and competence that have helped us reach the current level of safety.

Systemic themes do not necessarily have a direct, immediate and easily identifiable link to an individual occurrence, incident or accident. Systemic threats are background factors, often latent. They can be associated with shortcomings in processes, methods or operating cultures, for example. If systemic threats are not identified and if the risks caused by them are not managed, they may trigger or contribute to an occurrence, incident or accident.

Identifying systemic threats is particularly important in relation to changes in the aviation system, in the case of new, emerging issues. The safety data available on these issues is often limited or non-existent, highlighting the importance of proactive safety risk and impact assessments and related research.

The global safety management chain (*GASP–EASP/EPAS–FASP/FPAS–SMS*) was created to systematically develop the safety of the entire aviation system and its elements (*see FASP, section 1*). Key system-level elements are the state safety programmes (*SSPs, including the FASP in Finland*) and stakeholders' Safety Management Systems (*SMS*).

4.1.1 SYS.001. Finnish Aviation Safety Programme

EPAS reference: MST.0001: Member States to give priority to the work on SSPs

SYS.001.1, Finnish Aviation Safety Programme

Action:

Traficom has published the Finnish Aviation Safety Programme (FASP). Finland complies with the obligations for national aviation safety management, operations of aviation authorities and national coordination described in EU regulations, EPAS MST.0001 and ICAO Annex 19. Traficom updates and further develops the programme. Traficom actively communicates about the programme contents and sees to the implementation of the programme and the continuous improvement of activities based on the programme.

Objective of the action:

Finnish aviation safety management is systematic, effective and continuously improving. Finland complies with ICAO and EU regulation requirements regarding the development and introduction of a safety programme.

Stakeholder responsible for implementation:

Traficom: Maintenance, development and implementation of the FASP; coordination of national cooperation in aviation safety management and monitoring of the implementation with regard to aviation organisations.

Other national authorities with responsibilities under FASP: The fulfilment of responsibilities described in the FASP and participation in national coordination and cooperation when necessary. National cooperation and coordination have been described in FASP section *1.5.3 National cooperation in aviation*.

Aviation organisations: Processing FASP and its Annexes with reference to their operations and integration of the actions concerning their operations set out in the Finnish Plan for Aviation Safety (FASP Annex 1) and the national safety performance objectives and indicators (FASP Annex 2) into their own safety management.

Timetable

Continuous

Deliverable

An up-to-date national safety programme has been published and implemented

Status

The need to update the FASP is assessed annually. **The latest version of the programme, FASP version 8.0, was published on 4 October 2022.** The next FASP update will be implemented in 2025. ICAO reviewed the FASP and its implementation in terms of GEN, SDA, ANS, OPS and AIG in its SSP implementation assessment (SSPIA) in November 2018. Finland was the pilot country for SSP assessments. After that, EASA audited the Finnish SSP implementation as part of the *Standardisation Inspection Annual Programme* (SIAP) in September 2022. ICAO and EASA monitor and evaluate the implementation and efficiency of the FASP with regular surveys and audits.

Traficom continuously improves the FASP and related national aviation safety work based on development proposals.

4.1.2 SYS.002. Finnish Plan for Aviation Safety

EPAS reference: MST.0028: Member States to establish and maintain a State Plan for Aviation Safety (SPAS)

SYS.002.1, Finnish Plan for Aviation Safety

Action:

Traficom maintains the national Finnish Plan for Aviation Safety (FPAS).

Traficom has included EPAS actions for which EU Member States are responsible in the national safety plan and defines their focus areas in further detail utilising the national safety risk management process (see FASP section 2.6). Traficom also uses the process to determine other safety measures based on national needs and include them in the plan. The national safety risk management process also includes an annual review of the European-level risk picture produced by EASA (EASA Annual Safety Review) and prioritised safety themes (EPAS, volume III, Safety Risk Portfolio).

A draft plan is sent to the Ministry of Transport and Communications, Safety Investigation Authority, Finland and the Finnish Military Aviation Authority for comments. Traficom confirms the actions after the comments have been considered. Traficom publishes annual updates of the safety plan. Traficom actively communicates about the plan content, sees to the implementation of actions assigned to it, and promotes and oversees the implementation of actions assigned to other stakeholders.

Objective of the action:

Finland implements the actions assigned to EU Member States in the European Plan for Aviation Safety EPAS and those identified through the national aviation safety risk management process (*see FASP, section 2.6*).

Stakeholder responsible for implementation:

Traficom: FPAS maintenance, development and implementation Aviation organisations: Implementation of FPAS actions in their operations

Timetable

Continuous, annual updates

Deliverable

FPAS updated and published, actions implemented in practice

Status

The first version was published on 20 December 2013, this document is the latest update. Traficom implements FPAS as described in the FASP section 2.6 and oversees the implementation of the actions assigned to stakeholders.

4.1.3 SYS.003. Finnish aviation safety performance targets and indicators

EPAS reference: MST.0001: Member States to give priority to the work on SSPs and MST.0028 Member States to establish and maintain a State Plan for Aviation Safety (SPAS)

SYS.003.1, Finnish aviation safety performance targets and indicators

Action:

Traficom assesses the national aviation safety performance targets (SPT) and indicators (SPI) in Annex 2 to the Finnish Aviation Safety Programme as well as any need to update them, and updates Annex 2 where necessary. Traficom communicates about the targets and indicators, and applies them to safety management in Finnish aviation.

Organisations take the national safety performance targets and indicators into account, and assess and process them in relation to their own operations as part of their safety management. As a part of its monitoring, Traficom ensures that organisations have reviewed the valid safety performance indicators and targets and included them, when applicable, as a part of their safety management.

Objective of the action:

Effective and useful targets and indicators for monitoring and assessing the safety levels and performance of the Finnish aviation system have been specified and introduced. Finland fulfils EU regulation and ICAO requirements.

Stakeholder responsible for implementation:

Traficom Aviation organisations

Timetable

Continuous

2024–2025: Traficom informs aviation organisations about the FASP Annex 2 updated and published in January 2024 and supports the organisations in using the performance indicators and targets by means of safety promotion. Traficom includes the updated indicators under its responsibility in its monitoring of the performance of Finnish aviation, uses the results in ensuring safety and in risk management, and monitors the implementation of FASP Annex 2 with regard to the organisations.

2026–2027: Positive Safety 2 performance indicators will be added during the next round of SPI updates.

Deliverable

FASP Annex 2, *Finnish aviation safety performance targets and indicators*, has been assessed, updated, published and implemented

Status

Traficom updated the national aviation performance indicators and targets during the autumn of 2023. External consultation took place 29 November – 15 December 2023. Traficom also organised an information event for aviation organisations on 28 November 2023 with the theme "Measurement and monitoring of performance as a part of safety work" (*Suorituskyvyn mittaaminen ja seuranta turvallisuustyön osana*). The updated FASP Annex 2 was published on 11 January 2024. In 2024, the update was taken into account in the contents of aviation stakeholder events. How well aviation organisations have integrated FASP Annex 2 in their safety management will be monitored in connection with supervisory tasks.

Traficom has also been developing BI-based SPI monitoring and utilises monitoring results in its official duties. Traficom publishes monitoring information on the <u>Tieto.Traficom.fi</u> website.

4.1.4 SYS.004. Finnish aviation safety risk management

EPAS reference: MST.0001: Member States to give priority to the work on SSPs and MST.0028: Member States to establish and maintain a State Plan for Aviation Safety

SYS.004.1, Finnish aviation safety risk management

Action:

The Finnish aviation safety risk management process (*FASP, section 2.6*) is implemented by Traficom and aviation organisations in accordance with their roles and responsibilities. For the division of responsibilities, see FASP section 1.5.

Finnish aviation safety risk management consists of:

- identifying strengths and functions to be fostered in which aspects of risk management we have succeeded and what kind of good and effective performance it is important to maintain
- identifying key threats to be addressed also proactively and anticipating changes

- risk assessment and maintaining the risk pictures of aviation domains
- determining the acceptable risk level
- measures for maintaining risks at an acceptable level and strengthening the issues to be fostered, and
- monitoring the effectiveness of actions.

Information about the results is provided to aviation organisations and incorporated into Traficom's operating system and annual planning (FASP, section 2.6).

Each aviation organisation is responsible for the safety of its own operations. **Each aviation organisation must, within the scope of its SMS**, identify hazards/threats – including threats caused by changes in the operating environment – and assess risks related to its own operations, determine the acceptable risk level in its operations and take any necessary actions to eliminate risks or reduce them to an acceptable level.

As one important **result of the risk assessments, organisations also gain insight into the aspects of their operations where risks are well under control** and the good and effective safety work that should be encouraged.

Organisations have the opportunity to participate in creating and updating national risk pictures by participating in joint risk workshops and through the safety information they produce. Organisations' responsibilities to manage changes in their own operations or operating environment have been described in more detail in action *SYS.007.2, Management of change as part of safety management*.

Organisations must also process the Finnish Plan for Aviation Safety and nationally identified safety threats in respect of their own operations and, if necessary, implement actions to eliminate risks related to threats or reduce them to an acceptable level. **Organisations have the duty to demonstrate the performance of their management system to the supervising aviation authority**, on the basis of which Traficom assigns actions to organisations. For a description of acceptable levels of safety performance, see FASP sections 3.2 and 3.3.

As part of national risk picture work, Traficom continues to **proactively identify and assess changes in the operating environment**, such as the impact of the altered security policy situation in Europe. In its role as an authority, Traficom ensures that the risks related to the threats to the safety of the aviation system caused by the changes are assessed and the necessary risk management measures are specified and implemented.

Where necessary, the aforementioned actions are carried out in cooperation with EASA, ICAO and other international stakeholders and Finnish aviation organisations. The aviation sector has created mechanisms for ensuring safe operations and for relaying necessary information on conflict zones, threats or increased risks around the world. The mechanisms coordinated by the European Commission together with EASA include the European Information Sharing and Cooperation Platform on Conflict Zones and the Conflict Zone Information Bulletin (CZIB). Finland is actively involved in this work. Traficom and the aviation

organisations are monitoring the situation and ensuring that the risks to their operations are maintained at an acceptable level regardless of the situation in the operating environment.

Objective of the action:

Risk management in Finnish aviation is systematic, effective and continuously improving. Finland complies with ICAO and EU-level requirements regarding risk management in Finnish aviation.

Stakeholder responsible for implementation:

Traficom: Implementing Finnish aviation safety risk management as described in FASP section 2.6

Aviation organisations: Implementing safety risk management relevant to their operations, including the action described above

Timetable

Continuous

The objectives for 2024-2025 include especially:

- proactive identification of changes and proactive risk assessment as well as the specification of the necessary measures,
- management of interface risks.

Deliverable

Finnish aviation safety risk management process is implemented

Status

The Finnish aviation risk management process launched in Q3/2016 is now fully established, and the process is being developed further with the principle of constant improvement. National aviation risk pictures are created and updated in 14 aviation domains. In regard to the authority's own operations, risk assessments are conducted and actions are determined as part of the risk pictures in these 14 aviation domains and the risk management of Traficom's management system. Aviation organisations have been engaged in this cooperation.

The objectives for 2024 were realised. Regular work at risk workshops with stakeholders is ongoing in all domains. Traficom established an annual event called the Aviation Safety Forum (in Finnish *Ilmailun turvallisuusfoorumi*) for discussing current safety themes in practical terms together with aviation organisations. The objective is to support the organisations' own safety management efforts. <u>The 2024 Aviation Safety Forum</u> was held on 20 November 2024.

In 2025, annual risk workshops will continue to be organised for stakeholders with updated themes. Traficom will also organise the annual Aviation Safety Forum on 12 November 2025. The event will focus on the themes of future safety management in a changing operating environment and interface risk management.

SYS.004.2, Aviation safety, security and cybersecurity occurrence reporting coordination mechanisms

EPAS reference: MST.0040 Safety and security reporting coordination mechanism Note: The object of the EPAS action is reports related to safety and aviation security. The FPAS action has been extended to also cover the needs of 2024–2025 and the future years with regard to cybersecurity reporting concerning aviation.

Action:

Traficom ensures and, if needed, develops the occurrence reporting coordination mechanisms for aviation safety, aviation security and aviation cybersecurity. This will be done in a way that complies with the reporting obligations of different domains so that information submitted to Traficom can be used appropriately also in regard to the interfaces of different domains and their risk management.

Objective of the action:

To ensure the use of required information in aviation safety risk management at national level. National aviation safety risk management covers aviation safety, aviation security and cybersecurity, including interfaces.

Stakeholder responsible for implementation:

Traficom

Timetable

2022–2023: coordination mechanism implemented 2024/Q4: EASA ensures that the action is implemented in the Member States 2025: Reporting requirements included in the Cybersecurity Act become applicable 10/2025 and 02/2026: Part-IS regulations applicable

Deliverable

The required coordination mechanism in regard to the occurrence reporting of aviation safety, security and cybersecurity has been ensured.

Status

At Traficom, all aviation occurrence reporting under the Occurrence Regulation (EU) No 376/2014 (safety, security, cybersecurity) is processed and coordinated by the Aviation Security and Safety Information Unit. Safety and security reports are already processed in the same system and the necessary coordination for risk management needs exists. At present, the aviation safety and security information functions are undergoing overall development. For example, solutions are sought for the implementation of future reporting requirements under cybersecurity regulation that impact aviation to ensure that the information can be used in risk management as needed. In this context, regulations issued under the EASA Basic Regulation (Part Information Security, Part-IS) have been published; Commission Delegated Regulation (EU) 2022/1645 of 26 September 2022 (applicable as from 16 October 2025) and Commission Implementing Regulation (EU) 2023/203 of 2 February 2023 (applicable as from 22 February 2026). The regulations contain reporting obligations relating to aviation cybersecurity, which must be taken into account in the development of the reporting systems and processes of aviation authorities and aviation organisations covered by the regulations. The obligations must be fulfilled within the transitional periods provided for in the regulations.

An updated version of the NIS Directive, <u>(EU) 2022/2555</u>, was also released on 27 December 2022. On 2 January 2023, the Ministry of Transport and Communications initiated a <u>project</u> to transpose the updated NIS Directive into national legislation. Comments on the draft government proposal <u>were requested</u> for the preparation of the legislation in the autumn of 2023. <u>Parliament approved</u> the government proposal for legislation (Cybersecurity Act) implementing the

NIS 2 Directive on 25 March 2025. The Cybersecurity Act is <u>planned to enter into</u> <u>force on 8 April 2025</u>.

4.1.5 SYS.005. Safety promotion

SYS.005.1, Safety promotion in relation to safety management systems (SMS)

EPAS reference: MST.0002: Promotion of SMS

Action:

Traficom raises safety awareness as part of its aviation authority duties by visiting customers, organising internal events or external events for its stakeholders and taking the matter into account in different phases of approval and certification management as described in the FASP section 4.2, *External training and sharing of safety information*. Examples of sharing and developing safety management information include the risk workshops with stakeholders, as described in action SYS.004.1, and other events, such as the annual <u>Aviation Safety Forum</u> that supports aviation organisations' safety management (SMS).

In particular, Traficom also supports small and non-complex organisations and their SMS work to:

- harmonise practices and give examples of good and efficient SMS practices with a special focus on the perspective of small organisations, including change management, risk assessment and SPI examples;
- harmonise/promote good practices that Traficom uses to audit small organisations, including combined SMS audits for multiple domains and a risk and performance-based approach;
- ensure a uniform approach to the assessment of the need for the prior approval of Air Operator Certificates and the processing of approvals in connection with changes;
- draw up a check list on how organisations can verify the certificates and approvals required of their subcontractors and ensure compliance in subcontracting.

Traficom ensures that materials produced by <u>EASA Safety promotion activities</u> (incl. SPN, E-SPN-R), the <u>SM ICG group</u> (*Safety Management International Collaboration Group*) and other guidance materials relevant to safety management (SSP, SPAS, SMS) are available to aviation organisations. Traficom publishes guidance materials on its website where they are easily accessible and encourages organisations to use them. The website also includes information about the European working groups and forums whose work aviation organisations have an opportunity to participate in and/or influence.

As regards the impacts of changes in the operating environment (e.g. conflict zones), Traficom ensures that organisations are aware of and have access to all the guidance material relevant to safety management and their own operations produced by EASA and ICAO or any cooperation forums they coordinate.

Objective of the action:

Supporting aviation organisations in SMS implementation and development by making guidance material available to them

Stakeholder responsible for implementation:

Traficom

Timetable

Continuous: In terms of the activities described in FASP section 4.2, External training and sharing of safety information

Continuous: Traficom will organise an annual Aviation Safety Forum where topical themes of aviation safety and safety management are discussed from a practical perspective with the aim of proactive risk management. The content of the 2025 forum will place more emphasis on the perspective of small organisations.

2025–2026: Traficom implements the measures targeted at small/non-complex organisations as described in the action.

Deliverable

Establishing, sharing and using best practices

Status

Continuous implementation in line with the principles of the FASP section 4.2, *External training and sharing of safety information.* Traficom continues to participate in EASA's SPN and ESPN-R groups and in the work of SMICG and continues to maintain and develop its aviation website.

In 2024, Traficom organised the <u>Aviation Safety Forum 2024</u>. The event focused on proactive risk management as part of anticipatory and practical safety management and fatigue management and other human factors as part of risk management in organisations and at national level. The preparations for the 2025 forum are underway. The themes in 2025 will include future safety management in a changing operating environment and interface risk management.

SYS.005.2, Promoting safety through proficiency in and use of English in aviation

MST.0033 Language proficiency requirements — share best practices, to identify areas for improvement for the uniform and harmonised language proficiency requirements implementation

Action:

Refresher training for language proficiency examiners and the training of new language proficiency examiners are used to harmonise the activities of the examiners, collect best practices, and emphasise the significance of language proficiency requirements for safety. Traficom is a member of the EASA LPRI TF working group and actively participates in its activities. Traficom participates in producing information and responds to EASA's surveys on language proficiency.

Objective of the action:

Raise awareness among language proficiency examiners of the significance of their work and among organisations and individuals of the significance of language proficiency issues in relation to safety. Improve learners' proficiency in English and understanding of the significance of language proficiency as a safety factor.

Stakeholder responsible for implementation:

Traficom and aviation language proficiency examiners where relevant

Timetable

Continuous

Refresher training sessions when necessary. Traficom oversees the quality and harmonisation of the language proficiency examinations. Training will be developed based on the observations made during oversight.

Deliverable

Harmonised language proficiency examinations and good English proficiency among pilots

Status

Refresher training sessions are organised when necessary. The latest training session was organised in January 2025.

SYS.005.4, Taking into account the recommendations of safety investigation authorities

No EPAS reference: the need for the action has been identified based on national risk management.

Action background:

A great deal of unutilised safety information is still available in the domain of safety investigation. It is common that only the target organisation of safety recommendations takes recommendations brought up in the context of safety investigations into account in its operations.

Significant development has taken place in the area of safety concepts. According to the traditional Safety-I concept, things go well because the system is working as it should and things go awry when someone or something is not working correctly or breaks down. Advanced safety thinking, Safety-II, is founded on the idea that most things go well because people know how to adapt to their everchanging operating environment in their everyday work. The core philosophy of the Safety-II safety concept is to ensure that as many parts of the system as possible work correctly.

Targets of safety investigation are cases where risks have already been realised. Organisations should take into account the risks and any safety recommendations that apply to their operations in their own safety management systems, even if the recommendations have not been directed at their organisation. Organisations should use the means of risk management to assess the existence of a risk and its potential impact on their operations and its scale, and develop appropriate measures to prevent the realisation of the detected risk in future or mitigate its impact on their operations.

Action:

Traficom uses safety information available in its risk management work.

Aviation organisations ensure that they have described and implemented a process for utilising relevant external sources of information in their risk management work. This process must cover e.g. any safety recommendations directed at them by safety investigation authorities and actions assigned to them in the Finnish Plan for Aviation Safety. In addition, an organisation's process must cover the utilisation of national or international safety recommendations directed at other organisations that are also relevant to the organisation's own operations, in the organisation's safety management system.

Objective of the action:

Utilisation of safety information obtained through safety investigations as a source of information in aviation organisations' own safety management

Stakeholder responsible for implementation:

Traficom Aviation organisations

Timetable

Continuous

Deliverable

Safety information obtained through safety investigations has been processed and utilised in the organisations' own safety management

Status

Traficom has implemented the action for its part. Traficom monitors the implementation of the measures in connection with its oversight

4.1.6 SYS.006. Safety culture, reporting culture and just culture

SYS.006.1, Safety culture, reporting culture and just culture atmosphere

MST.0027: Develop Just Culture in GA (in FPAS extended to cover all aviation domains)

In general, it can be said that positive development has taken place for several years in the reporting culture of all domains of Finnish aviation. There is an atmosphere of trust, an integral element of just culture, between the aviation community and the aviation authority.

Finnish Aviation Safety Programme (FASP) section 2.5.3, *Confidentiality of occurrence information and Just Culture as elements of a good safety culture,* describes the elements of a good reporting culture and the principles of just culture in Finnish aviation. In Finland, the <u>reporting obligation under the Occurrence</u> <u>Regulation (EU) No 376/2014</u> also applies to aircraft listed in Annex I to the EASA Basic Regulation (EU) 2018/1139.

Action:

All aviation:

Traficom publishes and maintains guidance material on themes concerning safety culture and just culture on <u>Traficom's web page Safety culture and other cultural</u> <u>elements in everyday aviation</u>; it contains plenty of related material. Traficom also incorporates cultural elements into events organised for aviation organisations.

Through means of safety promotion, coordination and training, Traficom ensures that other national authorities with connections to e.g. obligations set by the Occurrence Regulation (EU) 376/2014 or other official obligations related to civil aviation understand the significance of cultural elements and safety information to safety management in aviation and aforesaid special European and national legislation related to aviation.

General and recreational aviation:

The <u>2015 recreational aviation safety project</u> built analysis cooperation between Traficom, the Finnish Aeronautical Association (SIL) and AOPA Finland (SMLL). This cooperation has since been further developed and is one way to maintain and strengthen good reporting culture. The cooperation developed in the context of safety work in recreational aviation in Finland also plays an important role in maintaining an atmosphere of trust. These cooperation forms will be continued and further developed. Particular areas of development include the quality and immediacy of feedback on reporting. For more information, please see action SYS.GA.002, *Safety promotion in GA*.

Traficom is also developing, in cooperation with SIL, an interface between SIL's SILPI reporting system and the ECCAIRS2 system. The development project will enable individual pilots to submit reports with a single form to the aviation authority and to SIL, if the pilot so wishes. The form will be available in Finnish, and it will be sufficiently simple for the purposes of private aviation.

Objective of the action:

Maintaining and reinforcing just culture in Finnish aviation and encouraging stakeholders to maintain and develop a good reporting and safety culture

Stakeholder responsible for implementation:

General action:

Traficom

Other national authorities with official obligations related to civil aviation or a connection to Traficom's authority duties, such as the National Police Board of Finland, the public prosecutor and Safety Investigation Authority, Finland.

Action on general and recreational aviation: Stakeholders committed to the operating model for Finnish recreational aviation safety work: Traficom, Finavia, Fintraffic ANS, Finnish Meteorological Institute, Finnish Aeronautical Association (SIL) and AOPA Finland (SMLL)

Timetable

Continuous

2025–2026: The relevant parts of the website on cultural elements in aviation are updated. Traficom assesses the need to organise information and training events on the topic for other national authorities, and the necessary events are organised. See also SYS.006.2, *Improving the quality of occurrence reporting*

Deliverable

Cooperation in promoting a good reporting and safety culture and the principle of just culture

Status

A webinar concerning safety culture supporting SMS work called <u>"Turvallisuuskulttuuri SMS-työn tukena-mitä se on?"</u> was organised on 26 January 2022 for aviation organisations and professionals. As a continuation to the webinar, the theme was addressed in regular risk workshops held with organisations throughout the year (*see FASP, section 2.6*).

An information/training event on aviation safety information and its utilisation was held for prosecutors on 17 March 2022. The event's themes included, in particular, the Occurrence Regulation (EU) 376/2014, the principle of just culture and the importance of safety information as a building block of safety management.

The updated FASP published on 4 October 2022 strengthened the elements of safety culture and just culture (see FASP version 8.0, incl. sections 1.1 *Finnish aviation safety policy*, 1.7 *Enforcement policy* (*CE-8*) and 2.5.3 *Confidentiality of occurrence information and Just Culture as elements of a good safety culture*). An updated version of the FASP, FASP 9.0, will be published in 2025. The update process includes an assessment of the need to give safety culture and just culture more emphasis in the programme.

<u>Traficom's website for cultural elements</u> (in Finnish), published on 15 April 2021, was also updated in 2023.

The interface between SILPI and ECCAIRS2 is under development, with the aim of being completed by the summer of 2025.

SYS.006.2, Improving the quality of occurrence reporting

MST.0043: Improvement of data quality in occurrence reporting

Any accidents, serious incidents and occurrences in civilian aviation in Finland must be reported in accordance with Regulation (EU) No 376/2014. The more detailed procedures and instructions to be followed in Finland have been compiled into the Advisory Circular GEN T1-4. The types of cases in different aviation activities where the reporting is mandatory have been presented in the Annexes to Regulation (EU) 2015/1018.

In Finland, the reporting of occurrences observed in aviation activities has been improving year by year. Finland is one of the top countries in Europe based on the absolute number of reports, and especially after the numbers have been adjusted so that they are proportionate to traffic volumes. Information about the development of reporting is published every quarter at the <u>Tieto.Traficom</u> website, on the page <u>Flight safety reporting</u>.

In addition to reporting activity, in recent years attention has also been paid to improving the quality of reports. In this context, quality refers specifically to the text content of the reports – in addition to the actual description of the situation (what happened), the parties submitting a report have been encouraged to provide an assessment of what caused the event and what could be done to prevent similar situations in the future. Such information plays a key role when organisations and the authorities analyse cases and determine the corrective action needed.

Action:

Traficom:

Traficom organises cooperation events regularly with the most important aviation organisations to discuss the principles of occurrence reporting and the use of occurrence information in analyses and national risk management work.

Traficom regularly provides information about the development of the number of occurrence reports as well as the importance of the quality of occurrence information on its website, in safety bulletins, in the Advisory Circular GEN T1-4, and in various events and seminars. The information provided includes <u>instructional material</u> on occurrence reporting, for example. The communication activities place special emphasis on the importance of providing comprehensive descriptions of events.

Traficom's oversight and other communications encourage organisations to pay attention to the quality of occurrence reports and their comprehensive analysis as well as on covering reporting issues in their own training events and information activities.

Aviation organisations:

Aviation organisations must pay attention to the quality of occurrence reports and their comprehensive analysis and include topics related to reporting in their own training events.

Organisations must pay attention to ensuring that the following issues are described in the field "Description of the event" in sufficient detail for the purposes of occurrence report analysis and train their personnel to do so: what happened, what were the consequences, an estimate of the causes of the event and the factors that contributed to it, an assessment of what could be done or what the party submitting the report has already done to prevent similar events, and a description of the weather, if it influenced what happened.

Objective of the action:

Maintain and strengthen a good reporting culture in Finnish aviation and improve the quality of occurrence reports so that the safety information obtained from them would better support knowledge-based decision-making, a risk- and performancebased approach and proactive safety work.

Stakeholder responsible for implementation:

Traficom

Aviation organisations

With regard to general and recreational aviation: Stakeholders committed to the operating model for Finnish recreational aviation safety work: Traficom, Finavia, Fintraffic ANS, Finnish Meteorological Institute, Finnish Aeronautical Association (SIL) and AOPA Finland (SMLL)

Timetable

Continuous

Deliverable

Instructions and actions for promoting safety in order to improve the quality of occurrence reporting

Status

The actions are ongoing.

For several years, Traficom has been promoting a good safety culture in Finnish aviation and compliance with just culture principles by the means described in the action *SYS.006.1*, *Safety culture, reporting culture and just culture atmosphere* Qualitative factors in occurrence reporting are currently being addressed, e.g.

On the page: Safety culture and other cultural elements in everyday
<u>aviation</u>

• Especially on its subpage: <u>Reporting culture</u>

- On the page: Flight safety report
- On the page: The website Tieto.Traficom.fi has its own page for <u>flight safety</u> <u>reporting</u>. The page describes the development of reporting as well as the reporting taxonomy.

For several years, Traficom has been organising regular cooperation meetings with the most important aviation organisations to review occurrence reports and their use in analyses and national risk management work.

4.1.7 SYS.007. Safety management systems (SMS)

SYS.007.1, Assessment of safety management system (SMS) performance

EPAS reference: MST.0026: SMS assessment

Action:

To assess organisations' compliance management systems (CMS) and safety management systems (SMS), Traficom uses methods that produce evidence of the compliance and performance of the organisations' management systems. As one element of the development work, the management system assessment tool developed by EASA has been taken into account, either as such or for its contents.

Traficom regularly assesses whether its assessment tool is up to date and updates it when necessary. The latest revision of EASA's assessment tool is taken into account in the update. EASA published an update to its <u>Management System</u> <u>Assessment Tool</u> in September 2023.

Target levels are set for the performance of the entire safety management systems used by organisations or for different elements of these systems. Based on the results, Traficom decides on the need for action (e.g. oversight, safety promotion). As part of the assessment of organisations' SMS performance, Traficom assesses how organisations have addressed changes in the operating environment in their safety management. Changes in the operating environment may include, for example, international crises, the potential or identified effects of conflict zones on safe operations or the potential impact of cost or resource challenges on organisations' operations (see SYS.007.2, *Management of change as part of safety management*).

National safety performance indicators (*FASP, Annex 2*) are also used to monitor the development of SMS performance in organisations.

Objective of the action:

Traficom uses the results of performance-based oversight and further develops the approach, and the assessment criteria for SMS audit practices are harmonised across Member States.

Stakeholder responsible for implementation:

Traficom

Timetable

Continuous

2025–2026: In 2024, training on the use of the assessment tool. The experience gained in the use of the tool during the training sessions will be taken into account when assessing the need for its further development in 2025. The review and update of the tool will also take into account any changes that EASA RMT.0706 may bring about in the EU legal framework on safety management. In the update, action SYS.007.4, *Assessment of the safety culture of AOC operators*, and the safety culture assessment tool being created by EASA will also be taken into account.

Deliverable

Traficom has assessment methods and tools for assessing overall performance, and it uses these in its risk- and performance-based activities. Traficom is able to provide EASA with the required information on the SMS performance of Finnish organisations and to give feedback on areas where EASA's SMS assessment tool needs to be further developed.

Status

The assessment tools are systematically used as part of OPS (AOC, SPO and NCC), ATO, GH, ADR and ANS oversight, and the results of the assessment lay the foundation for organisations' profiles and risk-based oversight. The use of the tools will be gradually expanded to also cover AIR oversight (Part-CAMO 2022, Part-145 2023). The use of the tool has also been expanded to cover the activities of AeMC organisations.

Traficom provides EASA with information on the compliance and performance of organisations' SMS in the manner specified by EASA either separately or in connection with standardisation. A Traficom representative also participated in the EASA working group that revised EASA's SMS assessment tool.

Traficom updated the assessment tool it uses in 1/2023. The update took into account the changes made by the EASA working group to the EASA MS tool and the feedback received from the users of the tool. Training on the content of the updated tool and the harmonisation of assessments was provided in 2024 to all aviation inspectors to share best practices and harmonise the interpretation of assessment criteria, thereby further improving efficiency in the oversight of safety management systems.

SYS.007.2, Management of change as part of safety management

No EPAS reference: The action listed below was defined on the basis of nationally identified needs for action.

Action:

Aviation organisations constantly develop and improve their operations. In an assessment carried out by Traficom on the effectiveness of stakeholders' SMS procedures for the management of change (MoC), it was observed that the procedures do not yet efficiently support all aspects of the identification of safety threats caused by changes and the associated safety risk management. Organisations must ensure that:

- they have an appropriate MoC procedure, including required personnel training
- they identify changes that need to be processed in a timely manner. The management informs the organisation of the changes in advance, ensuring that they can be processed with enough time
- possible effects of the results are genuinely taken into account in decision-making; depending on the results, it may be decided that the designed change will not be implemented at all or that the necessary change management actions must be adopted in a timely manner (needs for actions before, during and after the implementation of the change, incl. monitoring the impact of the change as necessary)
- the performance of the MoC procedure is subject to an internal audit as part of the SMS system
- the performance of the MoC procedure can be verified.

As part of its oversight activities, Traficom assesses the performance of stakeholders' SMS MoC functions and internal audits.

The assessment also takes into consideration how the organisation has identified and processed different current changes, such as changes in the operating environment and the operation of the organisation due to e.g. pandemics or conflict zone situations, both during the situation itself and during the recovery from the situation. The assessment also focuses on how the organisation has utilised available information on identified threats caused by the situations (including information produced by EASA and the Conflict Zone information coordinated by the Commission together with EASA), how it has strived to identify potential threats caused by the changes, and how it has processed the abovementioned as part of the organisation's management of change.

In addition, the assessment also focuses on how the organisation has identified and processed changes to operational activities and supportive functions, including safety management, resulting from different business challenges, such as cost pressures, resource challenges or employee turnover. The assessment also addresses how the organisation has defined the necessary change management actions in order to maintain an acceptable level of safety and a positive safety culture within the organisation.

Objective of the action:

Ensuring that aviation organisations implement timely and comprehensive MoC procedures and identify the changes in their operations that require the activation of the MoC procedure

Stakeholder responsible for implementation:

Aviation organisations Traficom

Timetable

2023–2026 For Part-CAMO organisations, actions are required from the date of issue of the final Part-CAMO certificate.

Deliverable

Organisations have highly effective MoC procedures, the functioning of which can be verified.

Status

Ongoing. Based on the observations, the focus of the oversight is especially on the timely identification of changes requiring a risk assessment, risk management as the change process progresses (updating the risk assessments made) and comprehensive implementation of change management.

SYS.007.3, Governance structure

EPAS reference: MST.0019: Better understanding of operators' governance structure

Action:

Traficom examines how the organisations' key persons – including safety managers and accountable managers – in reality implement and perceive the responsibilities related to their roles. In this, Traficom also uses the following guidance material prepared by EASA: <u>Practical Guide: Management of hazards related to new</u> <u>business models of commercial air transport operators</u>, <u>Guidance for the oversight</u> <u>of group operations</u> (version 2.0 published in 2024).

The organisations' management has the duty to ensure that new business models and any threats associated with them are addressed in the company's SMS, including timely processing through change management procedures (MoC) where required. This duty also applies to the subcontracting of safety-critical functions and the subcontracting of chained or large-scale functions.

Objective of the action:

Identifying threats related to new business models and assessing and reducing their risks.

Stakeholder responsible for implementation:

Traficom Aviation organisations

Timetable 2025

Deliverable

Oversight measures taking the action into account; safety discussions and audits as well as updated performance profiles

Status

For Traficom's part, the action is implemented in connection with safety discussions and oversight and taken into consideration in the organisations' performance profile.

SYS.007.4, Assessment of the safety culture of AOC operators

EPAS reference: MST.0042: Assessment of safety culture at air operators

Action background

A positive safety culture, good reporting culture and maintaining a just culture atmosphere play a key role in ensuring the safety of aviation organisations' operations. The measurement and evaluation of cultural elements involve many challenges. EASA and the Member States strive to incorporate cultural elements into the evaluation and monitoring of organisations' performance in a more systematic manner. In this work, it is essential to monitor the effectiveness of the evaluation, collect regular feedback from the Member States and organisations and further develop the evaluation and monitoring of cultural elements based on feedback and experience. At the same time, it is important to continue the active implementation of safety promotion actions on the topic.

Action:

2023: Traficom works actively in EASA forums in order to ensure that material and tools produced by EASA to evaluate safety culture would correspond to the views and needs of Finnish organisations.

2024–2025: Traficom assesses the material and tool produced by EASA and, based on the assessment, as appropriate, incorporates the elements of constant evaluation of safety culture into the processes and tools used in the assessment of organisations' performance.

2025: The elements described above are implemented as part of performance assessment.

Traficom continues to implement the theme in practice by means of safety promotion by implementing the long-term action *SYS.006.1 Safety culture, reporting culture and just culture* and utilises previous experience of the evaluation of safety culture in the process.

Objective of the action:

Maintaining and promoting a good safety culture and incorporating cultural elements into organisations' safety management.

Stakeholder responsible for implementation:

Traficom Timetable 2023–2025

Deliverable

EASA has produced guidance material and tools for Member States for the purpose of evaluating the safety culture of organisations. Traficom has included elements of safety culture evaluation in the oversight of AOC (CAT) operators.

Status

Traficom assesses the safety culture of AOC operators as part of SMS audits and assessments. Traficom assesses the suitability of the safety culture tool created by EASA for its use after it has been released.

4.1.8 SYS.008. Cybersecurity in aviation

SYS.008.1, Cybersecurity in aviation

No EPAS reference. The need for the action has been identified based on national risk management.

Background:

International cyber regulation in aviation is developed in a risk- and performancebased manner. The management of cyber risks in aviation, or more precisely the management of information security risks with an impact on aviation safety or aviation security, will become increasingly central in flight safety activities. To this end, the management of information security must become a more integral part of the management of the overall safety of the aviation system carried out by the authority and organisations.

Action:

Cybersecurity has been included in the Finnish Aviation Safety Programme (FASP) and the Finnish Aviation Security Programme. Cybersecurity is discussed in connection with Finnish aviation safety risk management (FASP, section 2.6).

In Finland, the aviation cybersecurity work implements the ICAO⁹ and EU strategies as well as Finland's Cyber Security Strategy 2024–2035¹⁰ and fulfils the international and national obligations set for cybersecurity in aviation.

Organisations must ensure the identification of cybersecurity threats – including ones caused by changes in the operating environment – and the management of related risks concerning systems and information critical to aviation safety and security.

Objective of the action:

Efficiently identifying cybersecurity threats and managing the risks caused by them

Stakeholder responsible for implementation:

Traficom Aviation organisations

Timetable

Continuous: Traficom:

⁹ <u>https://www.icao.int/cybersecurity/Pages/Cybersecurity-Strategy.aspx</u>

¹⁰ Finland's Cyber Security Strategy 2024–2035
- Maintaining the FASP, Security Programme and risk picture/portfolio in terms of cybersecurity. As the civil aviation authority, supervising the cybersecurity of aviation in connection with granting certificates and carrying out continuous certificate management.
- Actively influencing the development of EU regulation and ICAO standards and recommendations on cybersecurity in aviation and implementing the gradually increasing cyber regulation in Finland.
- Utilising performance assessment tools and the guidance and material prepared by EASA and Member States in the context of Part-IS implementation Task Force cooperation in the oversight and assessment of aviation organisations' capabilities in the management of cybersecurity.
- Maintaining the cybersecurity risk picture/portfolio of Finnish aviation; identifying threats, paying attention to changes in the operating environment, risk management and strengthening resilience.

Continuous: Organisations: Identifying cybersecurity threats and managing the risks caused by them

2025-2026:

• Appropriate consideration of the management of information security related to aviation as part of the flight safety work of aviation organisations

Deliverable

- Cybersecurity included in the FASP and its Annexes as well as the Finnish Aviation Security Programme
- A Finnish aviation cybersecurity risk picture/portfolio (strategic situational picture of aviation cybersecurity) is established and maintained
- Organisations have methods for identifying threats to cybersecurity and managing the related risks.
- The EU and national regulation on aviation cybersecurity is appropriate and effective. Regulatory obligations have been implemented in the Finnish aviation system.
- Traficom and aviation organisations have the necessary systems and processes to report cybersecurity events/incidents and store, protect, process, analyse and relay information to the appropriate authorities in accordance with the regulatory obligations related to aviation cybersecurity.

Status

The work is progressing as planned.

Finland is part of the most important international working groups and forums on aviation cybersecurity, such as ICAO's Cybersecurity Panel and Trust Framework panel, ECAC's Cyber Study Group and EASA's ESCP, Part-IS Implementation Task Force and Network of Cybersecurity Analysts <u>NoCA</u>. Finland also participates in the Commission's Aviation Cybersecurity Sub Group that focuses on issues related to the coordination of different cyber regulation instruments (NIS2, AVSEC and Part-IS) that affect aviation.

Finland has been actively influencing the reform of the NIS Directive (EU) 2022/2555 published on 27 December 2022 and the regulations issued under the EASA Basic Regulation: <u>Commission Delegated Regulation (EU) 2022/1645</u> of 26 September 2022, <u>Commission Implementing Regulation (EU) 2023/203 (Part</u> Information Security, Part-IS) of 2 February 2023 and the Part-IS AMC and GM material published on 13 July 2023.

As regards the NIS Directive, the Ministry of Transport and Communications initiated on 2 January 2023 a <u>project</u> to transpose the updated NIS Directive into national legislation. Comments on the <u>draft government proposal</u> were requested for the preparation of the legislation in the autumn of 2023. Parliament approved the government proposal for legislation (Cybersecurity Act) implementing the NIS 2 Directive on 25 March 2025. The Cybersecurity Act is <u>planned to enter into force on 8 April 2025</u>.

With respect to Commission regulations, i.e. Part-IS regulation, the work will continue during the transition period in the Part-IS Implementation Task Force, in which the implementation of the regulatory framework is prepared for in cooperation with EASA and the Member States. To support the work during the transition period, EASA has also published the summary <u>Easy Access Rules for Information Security</u> as well as the <u>FAQs on Information Security</u> page related to the Part-IS implementation.

At national level, the focus in 2024–2026 is on the supervision of organisations based on the national and EU cyber obligations currently in force and developing a supervision concept that takes into account the new requirements that will become applicable in 2024, 2025 and 2026. Another focus area is promoting cybersecurity with all aviation organisations via national cooperation, in addition to the risk picture and situational awareness work carried out in cooperation with key aviation organisation. Traficom also maintains and develops a website on cybersecurity in aviation, published in December 2021, with information on cybersecurity work in aviation, relevant regulation and guidance material.

4.1.9 SYS.009. Oversight competence, resources and focus areas

SYS.009.1, The oversight of Part-147 organisations

EPAS reference: MST.0035: Oversight capabilities/focus area: Fraud cases in Part- 147

Action:

Part-147 organisations must ensure that:

- all changes to the examination system are made in a controlled manner
- the personnel involved in the examination activities have been appropriately trained and familiarised with their task
- the roles of the persons involved in processing the examination questions have been defined
- the confidentiality of the examination questions is ensured before each exam
- risk factors related to the examination situation are identified and anticipated
- arrangements are made for external individuals taking the examination outside the school in a manner approved by the authorities.

Traficom continuously monitors the activities of Finnish Part-147 organisations. Examination activities are monitored by following the preparation of the examination, the examination situation and the processing of questions. The themes listed above are also reviewed in discussions and meetings with the persons responsible for the examination activities and supervising the examinations. The process has proven to be reliable. Future changes to the examination system require implementing the management of change procedure (MoC) as well as identifying threats caused by the change and other factors and related risk management.

Objective of the action:

Ensuring that organisations carry out the examination process in accordance with the Regulation and that they recognise any such risks in their own activities that may jeopardise the reliability of the examination.

Stakeholder responsible for implementation:

Traficom Part-147 organisations

Timetable

Continuous

Deliverable

Organisations have a safe, operational and reliable Part-147 examination system

Status

Ongoing

SYS.FOT.009.2, Resources and competence

EPAS reference: MST.0032: Oversight capabilities/focus area **a)** *Availability of* **adequate personnel in CAs**, b) Cooperative oversight in all sectors, c) Organisations management system in all sectors)

Action:

Traficom is committed to ensuring it has the resources and expertise required for its official duties as an aviation authority. This is supported by continuous training and international cooperation.

Resources are continuously assessed.

Objective of the action:

The level of safety in Finnish aviation remains high.

Stakeholder responsible for implementation:

Traficom

Timetable

Continuous

Deliverable

Official duties in the field of aviation are performed with sufficient resources and expertise.

Status

Ongoing

SYS.009.3, Cooperative oversight

EPAS reference: MST.0032: Oversight capabilities/focus area a) Availability of adequate personnel in CAs, b) Cooperative oversight in all sectors, c) Organisations management system in all sectors)

Action:

Traficom engages in active cooperation with other states concerning the management and oversight of approvals and certificates issued to Finnish companies that also operate outside Finland. Traficom also seeks to make cooperation agreements with the aviation authorities in its key partner countries.

Objective of the action:

The level of safety in commercial air transport remains high. State aviation authorities in different countries have the means and cooperation mechanisms they need for oversight in situations where several countries share responsibility for overseeing an organisation.

Stakeholder responsible for implementation:

Traficom

Timetable

Continuous

Deliverable

Sufficient and effective oversight in cooperation with the aviation authorities of other countries.

Status

Ongoing

SYS.009.4, Performance- and risk-based operations management

EPAS reference: MST.0032: Oversight capabilities/focus area a) Availability of adequate personnel in CAs, b) Cooperative oversight in all sectors, c) **Organisations management system in all sectors**)

Action:

Traficom maintains and develops performance- and risk-based operations management based on the principles of continuous improvement.

Traficom carries out and develops national-level risk management (*see actions SYS.004.1 and SYS.004.2*) and utilises the results thereof in the performance- and risk-based operations management of organisations. Traficom utilises and develops its capabilities and existing methods in regard to the assessment of organisations' performance (*see action SYS.007.1*) and strengthens its competence in taking human factors and safety culture into consideration in the assessment of performance (*see action SYS.009.6*).

Objective of the action:

Risk management in Finnish aviation is systematic, effective and continuously improving. Finland complies with ICAO and EASA requirements regarding risk management in Finnish aviation.

Stakeholder responsible for implementation:

Traficom

Timetable

Continuous

Deliverable

Performance- and risk-based operations management.

Status

Ongoing as regards actions.

SYS.009.5, Fatigue risk management (FRM) as part of risk management

EPAS reference: MST.0034: Oversight capabilities/focus area: flight time specification schemes

Action:

Traficom develops competencies and methods for assessing the functionality and efficiency of the fatigue management of organisations, including the development and implementation of the Fatigue Risk Management System (FRMS) functionality and performance assessment tool.

A representative of Traficom participates in the activities of the FTL & FRM Expert Group under EASA's OPS TeB. The Expert Group strives to increase cooperation and harmonisation between EASA Member States with regard to Fatigue Risk Management Systems. For example, the Group develops the existing and produces new guidance material on the themes of FTL and FRM.

In March 2024, the authority members of the FTL & FRM EG group agreed to arrange a meeting targeted only at aviation authorities every quarter. The aim of this action is to increase communication between the aviation authorities of the Member States and the exchange of good practices in addition to joint initiatives in fatigue management issues, and find common views to support effective development work at EU level in the context of fatigue management.

In addition, Traficom participates in the activities of the *Fatigue Risk Management Forum* for forming an up-to-date, international situational picture and obtaining the most recent research knowledge.

Objective of the action:

- Increasing the competence of inspectors.
- Forming a reliable picture of the functionality and efficiency of organisations' fatigue management.
- Increasing mutual cooperation and harmonisation between EASA Member States with regard to the monitoring of fatigue management.

Stakeholder responsible for implementation:

Traficom

Timetable

2023-2026

2024–2026: Traficom carries out a survey on the state of fatigue management for companies operating multi-pilot commercial air transport subject to FTL rules. The results will be used in the work of the authorities.

2026: Providing personnel with training on the new flight and duty time limitations in air taxi operations

Deliverable

- Creating an EASA-level tool for assessing the functioning and efficiency of fatigue management and incorporating this assessment into organisations' performance profiles.
- Information on fatigue management performance will be used in the work of the authorities.

Status

The fatigue management assessment tool is ready and in use. The tool will be used as part of organisations' management system assessments and the results will be included in organisations' performance profiles. Traficom has commissioned a survey on the state of fatigue management for companies operating multi-pilot commercial air transport subject to FTL rules. A key objective of the survey is to gain a better picture on the fatigue status of crews, and as a derivative, the effectiveness of the companies' fatigue management.

The theme was also addressed at the <u>2024 Aviation Safety Forum</u> on 20 November 2024 where one of the main themes was fatigue management and other human factors as part of risk management in organisations and at national level.

SYS.009.6, Strengthening competence in taking human factors and human performance into account in regulatory work

EPAS reference: MST.0037: Foster a common understanding and oversight of Human Factors

Action:

Human factors and human performance (HF) are already part of the competencies in which staff is provided with training and which they are required to possess in many of Traficom's official duties in the field of aviation. They are also covered in personnel training programmes. HF has also become one of the focus areas in EASA and ICAO safety work. To strengthen the practical implementation of HF themes, Traficom will:

- assess the HF competency of its staff in relation to the competency requirements of different positions
- prepare a separate HF training programme and plan or make the necessary changes to existing training programmes and plans
- organise necessary additional HF training.

After this, Traficom will regularly assess the need for HF training and the level of HF competency as part of its existing processes for ensuring the maintaining of competency.

In carrying out the action described above, Traficom will utilise guidance material produced in EASA's SPT.0115 and relevant existing ICAO and EASA material, including the ICAO <u>Manual on Human Performance (HP) for Regulators Doc 10151</u> (First Edition) and <u>ICAO Safety Management Manual Doc 9859</u> (Fourth Edition).

Objective of the action:

Strengthen competency in regard to the oversight, analysis and consideration of human factors and human performance in Traficom's aviation authority work and implement the aforementioned themes into practice in a systematic manner.

Stakeholder responsible for implementation:

Traficom

Timetable

By the end of 2025

Deliverable

The importance and impact of human factors are more comprehensively taken into account in Traficom's regulatory work, including oversight, analysis, safety promotion and the assessment of the SMS performance of organisations.

Status

In 2021, the HF themes were included as part of Traficom's training programme regarding SSP (FASP) issues and they are included in the training programmes for service areas and teams. During 2023 and Q1/2024, all aviation personnel at Traficom completed HF training for the work of aviation authorities.

SYS.009.7, PPL/LAPL learning objectives in the Meteorological Information part of the PPL/LAPL syllabus

EPAS reference: MST.0036 PPL/LAPL learning objectives in the Meteorological Information part of the PPL/LAPL syllabus

Action:

Traficom will prepare the proposed learning objectives and include corresponding questions in the pool of PPL/LAPL theory exam questions. Traficom will strive to collaborate with EASA and other Member States in the preparation of the learning objectives to achieve a harmonised result.

Objective of the action:

Strengthen the competency of PPL/LAPL pilots in regard to meteorological information and its use through practical learning objectives.

Stakeholder responsible for implementation:

Traficom

Timetable

2023-2025 2025: EASA ensures that the action is implemented in the Member States

Deliverable

PPL and LAPL training programmes updated with supplementary learning objectives concerning meteorological information and the use thereof.

Status

The implementation has been completed for Traficom. EASA updated the LAPL and PPL learning objectives in March 2020 (ED Decision 2020/005/R) with regard to e.g. meteorology. The current learning objectives take the conditions of the action into account.

Traficom included questions corresponding to the learning objectives in the pool of <u>LAPL/PPL theory test questions</u> in January 2024. Training organisations have also been informed of the matter and provided with material suitable for educational purposes, e.g. <u>aeronautical meteorology material updated in 2023</u> produced by the Finnish Meteorological Institute. Links to pages by Traficom below:

- Practice questions for theoretical knowledge examinations in aviation <u>https://www.traficom.fi/en/transport/aviation/practice-questions-</u> <u>theoretical-knowledge-examinations-aviation</u>
- General aviation training material and instructions (in Finnish): <u>https://www.traficom.fi/fi/yleisilmailun-koulutusmateriaalia-ja-ohjeita</u>
- Winter operations bulletin for general and recreational aviators (in Finnish)
- Aviation safety bulletins that include plenty of material related to the weather (in Finnish): <u>https://www.traficom.fi/fi/liikenne/ilmailu/ilmailun-turvallisuustiedotteet</u>

NEW ACTION: SYS.MED.009.8, Preventive mitigation of incapacitation risk

No EPAS reference: the need for the action has been identified based on national risk management.

Action background:

According to data gathered in international aeromedical research on aviation accidents, less than 5 per cent of accidents can be attributed to a medical cause and the frequency of different medical conditions as causes for partial or complete incapacitation is as follows:

- 1. the largest group of conditions is cardiovascular diseases
- 2. the largest group of conditions is psychiatric conditions
- 3. the largest group of conditions is endocrinological conditions

International studies have found the following to be the most frequent chemical medicinal substances detected in connection with accidents:

- 1) medicinal products affecting the cardiovascular system
- 2) sedatives and
- 3) alcohol.

Action:

Pilots' fitness for aviation will be subject to enhanced monitoring in Finland by training aeromedical examiners to assess cardiovascular risks in accordance with the Implementing Regulation amending the Flight Crew Regulation that entered into force on 13 February 2025. Cardiovascular diseases are the leading cause of death in the Western countries, and the most common fatal diseases are myocardial and cerebral infarctions. Because of this, aeromedical examiners are also provided with training in the assessment of sleep apnoea risks in connection

with medical fitness for class 1 and class 2 medical certificates because untreated sleep apnoea also increases the risk of cardiovascular disease. This action is in accordance with EASA's new guidance on aeromedical requirements.

In accordance with the new amending Regulation that entered into force on 13 February 2025, aeromedical examiners are also provided with guidance on the assessment of cognitive decline caused by ageing and by underlying neurological and psychiatric medical conditions, in particular. Due to the amending Regulation, aeromedical examiners are also provided with instructions on ageing-related degenerative diseases affecting sensory organs and their assessment, with a particular focus on hearing and eyesight.

Objective of the action:

Reduce the risk of incapacitation by improving the capability of aeromedical examiners to detect groups of conditions that cause incapacitation, and thereby improve flight safety.

Stakeholder responsible for implementation:

Traficom

Timetable

2025-2026

Deliverable

Trainings, instructions and the higher competence of aeromedical examiners in detecting medical conditions affecting the risk of incapacitation.

Status

New action

4.2 Operational issues

Operational issues, introduction

Operational themes are more directly linked to the actions of an individual person, organisation or operational area or to environmental factors, including weather events. At operational level, threats may directly cause a situation to develop into an occurrence, incident or accident.



Operational threats and safety factors are often identified by analysing occurrence data from flight safety reports and by carrying out risk assessments. Risk management measures seek to reduce the probability of events that result in occurrences, incidents and accidents and mitigate the severity of their consequences.

For information on the safety situation of Finnish aviation, see the <u>aviation section</u> <u>on Traficom's Tieto.Traficom.fi website</u>.

Among other aspects, EPAS requires national safety plans to include threats identified at the international level. These include the following themes:

- Loss of control in flight (LOC-I) (LOC-I data on the Tieto.Traficom.fi website)
- Runway excursions (RE) (<u>RE data on the Tieto.Traficom.fi website</u>)
- Runway incursions (RI) (<u>RI data on the Tieto.Traficom.fi website</u>)
- Mid-air collisions (MAC) (<u>MAC/Airprox data on the Tieto.Traficom.fi website</u>)
- Controlled flight into terrain (CFIT) (CFIT data on the Tieto.Traficom.fi website)
- Fire, smoke and fumes (data on the Tieto.Traficom.fi website)
- Airspace infringement (AI) (AI data on the Tieto.Traficom.fi website)
- In addition, the actions include the national prioritised threat:
- Collisions while taxiing to or from a runway (GCOL) (<u>GCOL data on the</u> <u>Tieto.Traficom.fi website</u>)

4.2.1 OPER.001. Loss of control in flight (LOC-I)

EPAS reference: MST.0028: Member States to establish and maintain a State Plan for Aviation Safety



Further information: LOC-I data on the Tieto.Traficom.fi website

OPER.LOC.001.1, Loss of control in flight (LOC-I)

Action:

Loss of control in flight (LOC-I) threats and their identified causal factors have been included in the Finnish aviation safety performance indicators and targets (FASP Annex 2). Organisations must address and process LOC-I threats in their safety management and take action to reduce the risk thereof. Examples of factors that may cause LOC-I threats include, among other things, bird strikes, incidents involving foreign object debris (FOD) and the impact of extreme weather events, such as severe turbulence. Traficom monitors the number and risk level of LOC-I events, defines required actions as part of Finnish aviation safety risk management and assesses how organisations have addressed and processed LOC-I threats.

To process LOC-I threats as part of their safety management, organisations must:

- assess risks in their own operations
- define the acceptable level of safety and the necessary alert and response levels
- define and implement the required actions
- monitor the effectiveness of their actions.

Objective of the action:

LOC-I risk management

Stakeholder responsible for implementation:

Traficom: As regards Finnish aviation safety risk management (FASP 2.6) and oversight (FASP 3.0)

Aviation organisations and stakeholders (AOC, SPO, ATO, NCC, ANS, ADR): Addressing LOC-I threat in their operations

Timetable

Continuous

Deliverable

LOC-I events and their causal factors are included in FASP Annex 2 and addressed in Finnish aviation safety risk management and in organisations' own safety management.

Status

Traficom has implemented the action for its part. Traficom monitors the implementation of the measures in connection with its oversight

4.2.2 OPER.002. Runway excursions (RE)

EPAS reference: MST.0028: Member States to establish and maintain a State Plan for Aviation Safety

Further information: RE data on the Tieto.Traficom.fi website



OPER.RE.002.1, Runway excursions (RE)

Action:

Runway excursion (RE) threats and their identified causal factors, such as runway conditions (RWY CON), have been included in the Finnish aviation safety performance indicators and targets (FASP Annex 2). Organisations must address and process RE threats in their safety management and take action to reduce the risk thereof. They must also take into account the changes in the operating environment, e.g. how strong and/or sudden changes in the weather or changes in resources may affect operations.

Traficom monitors the number and risk level of RE events, defines the required actions as part of Finnish aviation safety risk management and assesses how organisations have addressed and processed RE threats.

To process RE threats as part of their safety management, organisations must:

- assess risks in their own operations
- define the acceptable level of safety and the necessary alert and response levels
- define and implement the required actions
- monitor the effectiveness of their actions.

The definition of required actions also includes measures and preparation for arranging the moving of an immobilised aircraft in a situation in which precautionary, preventive and recovery-focused protection measures (i.e. safety barriers) have failed, an RE risk has been realised, a runway excursion has occurred and all that is left is minimising the damage.

Objective of the action:

RE risk management

Stakeholder responsible for implementation:

Traficom: As regards Finnish aviation safety risk management (FASP 2.6) and oversight (FASP 3.0) Aviation organisations (AOC (aeroplanes), SPO (aeroplanes), ATO (aeroplanes), NCC (aeroplanes), ANS, ADR): Addressing RE threat in their operations

Timetable

Continuous

Deliverable

Runway excursions and their causal factors are included in FASP Annex 2 and addressed in the Finnish aviation safety risk management and organisations' safety management

Status

Traficom has implemented the action for its part. Traficom monitors the implementation of the measures in connection with its oversight

4.2.3 OPER.003. Runway safety

EPAS reference: MST.0028: Member States to establish and maintain a State Plan for Aviation Safety

OPER.RWY.003.1, Local runway safety teams (LRST)

Action:

Local Runway Safety Team (LRST) activities play an important role in the risk management of airports. Knowledge-based, effective risk management requires:

- **sufficient understanding of the activities** of all organisations that affect the safety of the airport
- sufficient exchange of safety information and safety-related observations and views between the organisations that operate at the airport
- cooperation and coordination in identifying threats, assessing risks, specifying the need for actions and implementing the actions, with a particular focus on interface risks.

A Local Runway Safety Team has been set up at Helsinki Airport. Airport operators must ensure the implementation and effectiveness of LRST activities also at other airports.

Traficom monitors the LRST activities from the perspective of their organisation and utilisation.

Objective of the action:

The objective of the action is to maintain good runway safety in Finland

Stakeholder responsible for implementation:

Traficom Aviation organisations (ADR (responsibility of organising LRST), ANS, AOC, ATO)

Timetable

Continuous

Deliverable

The LRST function has been implemented at airports, and the LRSTs operate effectively.

Status

An LRST is operating at EFHK. Traficom is involved in EFHK's LRST and processes the matter with organisations as part of oversight.

4.2.4 OPER.004. Runway incursions (RI)

EPAS reference: MST.0028: Member States to establish and maintain a State Plan for Aviation Safety

More information: <u>RI data on the Tieto.Traficom.fi website</u>

OPER.004.1, Runway incursions (RI)

Action:

Runway incursion (RI) threats and their identified causal factors have been included in the Finnish aviation safety performance indicators and targets (FASP Annex 2). Organisations must address and process RI threats in their safety management and take action to reduce the risk thereof.

Traficom monitors the number and risk level of RI events, defines the required actions as part of Finnish aviation safety risk management and assesses how organisations have addressed and processed RI threats.

To process RI threats as part of their safety management, organisations must:

- assess risks in their own operations
- define the acceptable level of safety and the necessary alert and response levels
- define and implement the required actions
- monitor the effectiveness of their actions.

Objective of the action:

RI risk management

Stakeholder responsible for implementation:

Traficom: As regards Finnish aviation safety risk management (FASP 2.6) and oversight (FASP 3.0) Aviation organisations (AOC (aeroplanes), SPO (aeroplanes), ATO (aeroplanes), NCC (aeroplanes), ANS, ADR): Addressing RI threat in their operations

Timetable

Continuous

Deliverable

Runway incursions and their causal factors are included in FASP Annex 2 and addressed in Finnish aviation safety risk management and organisations' safety management

Status

Traficom has implemented the action for its part. Traficom monitors the implementation of the measures in connection with its oversight

4.2.5 OPER.005. Mid-air collisions (MAC)

EPAS reference: MST.0028: Member States to establish and maintain a State Plan for Aviation Safety



Further information: MAC/Airprox data on the Tieto.Traficom.fi website

OPER.MAC.005.1, Mid-air collisions (MAC)

Action:

The threat of mid-air collisions (MAC) of **manned or unmanned** (drones) aircraft and their identified causal factors have been included in the Finnish aviation safety performance indicators and targets (FASP Annex 2). Organisations must address and process MAC threats in their safety management and take action to reduce the risk thereof.

Traficom monitors the number and risk level of MAC events, defines the required actions as part of Finnish aviation safety risk management and assesses how organisations have addressed and processed MAC threats.

To process MAC threats as part of their safety management, organisations must:

- assess risks in their own operations
- define the acceptable level of safety and the necessary alert and response levels
- define and implement the required actions
- monitor the effectiveness of their actions.

Objective of the action:

MAC risk management

Stakeholder responsible for implementation:

Traficom: As regards Finnish aviation safety risk management (FASP 2.6) and oversight (FASP 3.0)

Aviation organisations (AOC, SPO, ATO, NCC, ANS, UAS): Addressing MAC threat in their operations

Timetable

Continuous

Deliverable

Mid-air collisions and their causal factors are included in FASP Annex 2 and addressed in the Finnish aviation safety risk management and organisations' safety management

Status

Traficom has implemented the action for its part. Traficom monitors the implementation of the measures in connection with its oversight

OPER.MAC.005.2, Loss of separation between civil and military aircraft (MAC)

EPAS reference: MST.0024: 'Due regard' for the safety of civil traffic over high seas

Action background

In collaboration with ICAO, Finland has convened a working group (*Ad-hoc civil military expert group on flight safety over Baltic Sea*), the work of which is contributed to by all states in the Baltic Sea region except Lithuania as well as EASA, NATO and Eurocontrol. The group prepared the document *Principles and best practices in case of air encounters, especially in the High Seas airspace commonly shared by civil & military aviation over the Baltic Sea for ICAO EUR OPS Bulletin (<i>EUR OPS Bulletin 2017_001*). The group also established a strategic cooperation network that can, if necessary, address issues related to the coordination of civil and military aviation in the Baltic Sea region. Finland has announced its readiness to continue organising meetings on this theme, should this be considered necessary.

Action:

Finland creates, maintains and uses its "due regard¹¹" procedures, updates them to ICAO EUR Doc 032 and ensures that stakeholders who operate state aircraft are aware of the requirements and have access to the required guidelines for using the "due regard" procedures.

Finland maintains coordination between civilian and military aviation, also using the ICAO Manual on Civil-Military Cooperation in Air Traffic Management (Doc 10088).

On a general level, Finland monitors military aviation traffic volumes and the nature of activities over the Baltic Sea. Reported incidents where the involved parties are civilian and military aircraft are especially being monitored. The objective is to identify trends that may have a negative impact on aviation safety. Finland utilises this information as part of national aviation risk management and reports it to EASA in accordance with occurrence reporting obligations ((EU) 376/2014).

¹¹ A due regard procedure means that the theme in question is given appropriate attention. See also https://skybrary.aero/articles/due-regard

Finland continues with active cooperation at the European level and in ICAO to ensure safety in regard to these themes and maintains its readiness to, if necessary, lead working groups like the Ad-hoc Baltic Sea group.

Traficom has participated in the preparation of EASA's safety risk portfolio <u>Review</u> <u>of Aviation Safety Issues arising from the war in Ukraine</u>. As part of national aviation risk management (see FASP, section 2.6), Traficom has also produced and maintains a national aviation risk picture of the identified and potential impacts that the war in Ukraine and the related changes in the aviation operating environment may have on the safety of the aviation system.

As part of the maintenance of the national risk picture, Traficom processes information in the risk picture produced by EASA and takes it into account in the national risk picture. At regular workshops organised for aviation organisations, Traficom goes through threats caused by changes in the operating environment and the risk picture of the aviation domain in question. Traficom also provides organisations with relevant material produced by EASA.

As part of the national risk management process, Traficom encourages organisations to utilise national and international safety information in their safety management. Aviation organisations must also process the nationally prioritised threats highlighted in the FPAS in their own risk management. See also actions *SYS.004.1, Finnish aviation risk management* and *SYS.007.2, Management of change as part of safety management*.

Objective of the action:

Reducing the threat of loss of separation between civil and military aircraft and MAC by harmonising methods and increasing cooperation between relevant organisations

Stakeholder responsible for implementation:

Traficom

Timetable

Continuous

Deliverable

Mid-air collisions and their causal factors are included in FASP Annex 2 and addressed in the Finnish aviation safety risk management and organisations' safety management.

Status

The actions are ongoing.

4.2.6 OPER.006. Controlled flight into terrain (CFIT)

EPAS reference: MST.0028: Member States to establish and maintain a State Plan for Aviation Safety

Further information: CFIT data on the Tieto.Traficom.fi website



OPER.CFIT.006.1, Controlled flight into terrain (CFIT)

Action:

Controlled flight into terrain (CFIT) threats and their identified causal factors have been included in the Finnish aviation safety performance indicators and targets (FASP Annex 2). Organisations must address and process CFIT threats in their safety management and take action to reduce the risk thereof.

Traficom monitors the number and risk level of CFIT events, defines the required actions as part of Finnish aviation safety risk management and assesses how organisations have addressed and processed CFIT threats.

To process CFIT threats as part of their safety management, organisations must:

- assess risks in their own operations
- define the acceptable level of safety and the necessary alert and response levels
- define and implement the required actions
- monitor the effectiveness of their actions.

Objective of the action:

CFIT risk management

Stakeholder responsible for implementation:

Traficom: As regards Finnish aviation safety risk management (FASP 2.6) and oversight (FASP 3.0) Aviation organisations (AOC, SPO, NCC, ATO, ANS): Addressing CFIT threats in

their operations

Timetable

Continuous

Deliverable

Controlled flight into terrain and related threat factors are included in FASP Annex 2 and addressed in the Finnish aviation safety risk management and organisations' safety management.

Status

Traficom has implemented the action for its part. Traficom monitors the implementation of the measures in connection with its oversight

4.2.7 OPER.007. Fire, smoke and fumes

EPAS reference: MST.0028: Member States to establish and maintain a State Plan for Aviation Safety

Further information: data on the Tieto.Traficom.fi website



OPER.FIRE.007.1, Fire, smoke and fumes

Action:

Threats of fire as well as observations of smoke and other fumes and their identified causal factors have been included in the Finnish aviation safety performance indicators and targets (FASP Annex 2). Organisations must address and process these threats in their safety management and take action to reduce the risk. **Examples** of these threats include the **overheating/ignition of lithium batteries carried in the aircraft cabin or cargo compartment**.

Traficom monitors the number and risk level of fires and observations of smoke and other fumes, defines the required actions as part of the Finnish aviation safety risk management and assesses how organisations have addressed and processed these threats.

To process the threats associated with fire, smoke and fumes as part of their safety management, organisations must:

- assess risks in their own operations
- define the acceptable level of safety and the necessary alert and response levels
- define and implement the required actions
- monitor the effectiveness of their actions.

The definition of required actions as regards for example ADR operators includes possible direct radio contact between the aerodrome's rescue service and the aircraft and operating procedures for organising evacuation and rescue operations for aircraft on the ground, including in the vicinity of terminals and passenger boarding bridges.

Objective of the action:

Managing the risks of fire, smoke and fumes

Stakeholder responsible for implementation:

Traficom: As regards Finnish aviation safety risk management (FASP 2.6) and oversight (FASP 3.0)

Aviation organisations (AOC, NCC, AIR, ADR): Addressing threats related to fire, smoke and fumes in their operations

Timetable

Continuous

Deliverable

Threats of fires, smoke and fumes and their causal factors are included in FASP Annex 2 and addressed in the Finnish aviation safety risk management and organisations' safety management

Status

Traficom has implemented the action for its part. Traficom monitors the implementation of the measures in connection with its oversight

4.2.8 OPER.008, Collisions while taxiing to or from a runway (GCOL)

No EPAS reference: The action listed below was defined on the basis of nationally identified needs for action.

Further information: GCOL data on the Tieto.Traficom.fi website



OPER.GCOL.008.1, Collisions while taxiing to or from a runway (GCOL)

Action:

Collisions while taxiing to or from a runway (GCOL) and their identified causal factors have been included in the Finnish aviation safety performance indicators and targets (FASP Annex 2). Organisations must address and process GCOL threats in their safety management and take action to reduce the risk thereof.

Traficom monitors the number and risk level of GCOL events, defines the required actions as part of Finnish aviation safety risk management and assesses how organisations have addressed and processed GCOL threats.

To process GCOL threats as part of their safety management, organisations must:

- assess risks in their own operations
- define the acceptable level of safety and the necessary alert and response levels
- define and implement the required actions
- monitor the effectiveness of their actions.

Objective of the action:

GCOL risk management

Stakeholder responsible for implementation:

Traficom: As regards Finnish aviation safety risk management (FASP 2.6) and oversight (FASP 3.0)

Aviation organisations (AOC (aeroplanes), SPO (aeroplanes), ATO (aeroplanes), NCC (aeroplanes), ANS, ADR, GH): Addressing GCOL threat in their operations

Timetable

Continuous

Deliverable

Collisions while taxiing to or from a runway (GCOL) and their causal factors are included in FASP Annex 2 and addressed in Finnish aviation safety risk management and organisations' safety management

Status

Traficom has implemented the action for its part. Traficom monitors the implementation of the measures in connection with its oversight

4.3 Actions concerning individual domains of aviation

Section 4.3 contains actions assigned separately to each domain of aviation. These actions were specified on the basis of EPAS (EPAS reference given) and/or the results of the Finnish aviation safety risk management process. The section for each domain begins with the topical threat scenarios for



the domain in question (*see FASP, section 2.6*) for which it has been considered necessary to include actions in the Safety Plan. These threat scenarios are defined on the basis of national safety risk pictures, which are based on an assessment of the safety risk level in the relevant domain of Finnish aviation. The results of this assessment do not provide information on the performance of individual organisations regarding the threat in question.

In some domains, it was found that the actions in sections 4.1 and 4.2 already cover the key threats that have been identified. For these domains, actions have not been separately included in section 4.3.

4.3.1 Helicopter safety

SYS.HECO.001, Collaboration forums for helicopter safety

EPAS reference: MST.0015: Helicopter safety events

Action:

Traficom has established a <u>Finnish Helicopter Safety</u> <u>Team (FHST)</u>. The group convenes regularly. Traficom also organises an FHST Safety Day for Finland's helicopter operators each year as part of its safety promotion activities (*FASP section 4.2*). Traficom also distributes material produced for the Safety Day and other safety information to helicopter operators via its Helicopter safety



website (in Finnish) and as part of its daily regulatory work.

At the European level, Traficom promotes helicopter safety by participating in the activities of <u>EASA's ESPN-R-(*European Safety Promotion Network – Rotorcraft*)</u>. Traficom is an observer on EASA's R.COM committee. Traficom also participates in the *Nordic Meeting - Helicopter and General Aviation* forum, which deals with safety issues from a Nordic perspective.

Traficom promotes safety information produced at the European level to Finnish helicopter operators. In addition to this, helicopter operators can utilise EASA's helicopter safety website <u>Rotocraft - EASA community</u> and the open ESPN-R LinkedIn forum.

Objective of the action:

Improving helicopter safety

Stakeholder responsible for implementation: Traficom

Timetable

Continuous

Deliverable

FHST is operational, Traficom participates in European activities to promote helicopter safety.

Status

Implementation underway. Traficom organises *Helicopter Safety Day* events. In addition, the FHST working group has convened regularly. The working group convenes in the spring of 2025, and the Safety Day will be held in the autumn of 2025 as a risk workshop.

SYS.HECO.002, Helicopter safety

The system-level theme of **developing standard operating procedures (SOP) and supporting their implementation** was identified as a key scenario in the national risk picture for the domain of helicopter operations in commercial air transport (CAT RW) and aerial work (SPO RW). The theme is also one of the national safety performance indicators that helicopter operators are obliged to monitor (*FASP Annex 2, Finnish Aviation Safety Objectives and Safety Performance Indicators and Targets, helicopter operation indicator RW-SPI-SOP*). The development of SOPs has progressed well, but the work continues in certain areas.

Action:

Helicopter operators, including helicopter training organisations (ATO), ensure that they have standard operating procedures (SOP) which describe in sufficient detail and scope all helicopter operations relevant to their activities. SOPs are to be taken into account in all training and helicopter operations, they are reviewed regularly, and they are updated based on the needs identified in risk management.

Traficom includes SOPs and their implementation in its oversight plan as one of the oversight priorities and promotes their use by means of safety promotion (*FASP section 4.2*).

Objective of the action:

Implementing Finnish aviation safety risk management in the domain of helicopter operations by strengthening one of the key safeguards for reducing risks, the use of standard operating procedures, and thereby ensuring that the risk level in helicopter operations remains acceptable

Stakeholder responsible for implementation:

Organisations involved in helicopter operations in commercial air transport (CAT RW) and aerial work (SPO RW) Approved training organisations for helicopter operations (ATO RW) Traficom

Timetable

2023-2025

Deliverable

The action described above has been addressed in organisations' safety management and the results have been processed in connection with Traficom's oversight. The SOP theme is included in the promotion of safety.

Status

Implementation underway

SYS.HECO.004, Survey of the impact of regulatory obligations from the perspective of small operators

EPAS reference: MST.0041 Harmonisation in Helicopter AOC approvals, procedures and documents

Action:

Traficom will carry out a survey to determine whether small Finnish helicopter operators deem the current regulatory framework governing commercial helicopter operators to be too burdensome. As part of the survey, Traficom will send a questionnaire on the topic to Finnish helicopter operators.

At the EASA level, the aim is to reduce excess administrative work and streamline helicopter operators' licence processes. If, based on the result of the survey, the current regulations are deemed problematic by Finnish operators, Traficom will evaluate its control process and assess the need for changes and participate in development work through EASA's *Helicopter Expert Group* in order to improve the situation.

Objective of the action:

At the EASA level, the aim is to reduce excess administrative work and streamline helicopter operators' licence processes.

Stakeholder responsible for implementation:

Traficom

Timetable

2023-2026

Deliverable

A survey on the impact of regulation governing commercial helicopter operators from the perspective of small operators and any subsequent further actions, such as updated and harmonised AOC approval processes, working instructions and checklists used by Traficom.

Status

Implementation underway



Image: IMAGOKUVA

4.3.2 Airport safety

SYS.ADR.001, Airport safety

In terms of airport safety, the key scenarios at the operational level in the national safety risk picture are as follows:

- winter conditions at the airport
- maintenance of the runways and manoeuvring areas at airports
- unauthorised vehicles on runways (runway incursion, RI) in summer and especially in winter conditions
- operational compliance and usability of the manoeuvring area.

At the systemic level, the key scenarios are as follows

- shortcomings in airport maintenance reporting
- shortcomings in the use of information produced within SMS for decisionmaking (see also action SYS.007.2, Management of change as part of safety management)
- relay of timely condition information and the correspondence between this information and information received from elsewhere
- changes in resources and their impact on operations.

Action:

As part of their safety management, airport operators must address the above key scenarios identified at the national level and threats that they have identified themselves in respect of their own operations, define an acceptable level of safety and, if necessary, take action to reduce risks to an acceptable level.

Traficom includes the identified key scenarios in its oversight plan as one of the oversight priorities.

Objective of the action:

Implementing Finnish aviation safety risk management in the ADR domain by ensuring that the risks related to the threat scenarios described above are maintained at an acceptable level.

Stakeholder responsible for implementation:

Airport operators Traficom

Timetable

2025-2026

Deliverable

The action described above has been addressed in the organisations' safety management and the results have been processed in connection with Traficom's oversight.

Status

The implementation is ongoing with regard to oversight. Traficom, in cooperation with Finavia, Fintraffic ANS, Finnair, Norra and the Finnish Meteorological Institute as well as with the airports of Lappeenranta, Mikkeli, Enontekiö and Seinäjoki, has also updated the Winter Operations Bulletin for airlines flying into Finnish airports. The bulletin has been published in Finnish and English. The English version has been distributed through several different channels and can also be found on the IFALPA Safety bulletin website.

4.3.3 Safety of flight training

SYS.ATO.001, Safety of flight training

In the flight training domain (ATO), the following key scenario has been identified at the operational level in the national safety risk picture:



 shortcomings in airspace observation; these shortcomings may lead to a risk of collision (MAC), especially during solo flights to/from uncontrolled aerodromes.

At the systemic level, the following key scenarios were identified:

- deficiencies in training organisations' processes intended to ensure that an FSTD is suitable for the training provided by the organisation (see ORA.ATO.135). For example, if the aircraft used by the ATO are equipped with a different avionics version than the FSTD, the difference must be accounted for in the training.
- deficiencies in the FSTD organisation's processes intended to ensure the continuous compliance of the FSTD (see ORA.FSTD.100) and to inform users, such as ATOs, about any temporary shortcomings. For example, is a temporary defect is not described clearly, users may not necessarily understand that the device is faulty and may use it in training.
- deficiencies in the conduct of an individual instructor during a training session. The instructor should always check the FSTD for any temporary shortcomings and adapt the session so the faulty systems are not used so that students will not learn incorrect operating models.

- deficiencies in organisations' risk management, especially in identifying threats
- deficiencies in organisations' incident handling, especially in the root cause analyses
- risk assessment and necessary risk management measures related to operations in winter conditions at uncontrolled aerodromes.

Action:

As part of their safety management, flight training organisations must address the above key scenarios identified at the national level and threats that they have identified themselves in respect of their own operations, define an acceptable level of safety and, if necessary, take action to reduce risks to an acceptable level.

In addition, training organisations operating at uncontrolled aerodromes must review and, if necessary, update their risk analyses with respect to the impact of winter conditions.

Traficom includes the scenarios in organisations' risk-based oversight.

Objective of the action:

Implementing Finnish aviation safety risk management in the ATO domain by ensuring that the risks associated with the threat scenario described above are maintained at an acceptable level

Stakeholder responsible for implementation:

Flight training organisations Traficom

Timetable

2025-2026

Deliverable

The action described above has been addressed in organisations' safety management and the results have been processed in connection with Traficom's oversight.

Status

Implementation underway

4.3.4 Safety of commercial air transport

SYS.CAT.001, Safety of commercial air transport

At the operational level, the following commercial air transport (AOC) scenarios have been identified in the national risk picture and included in FPAS:

- impact of GNSS interferences to operative flight operations
- pilot mistakes due to fatigue and
- increased unruly behaviour of passengers.

At the systemic level, the following scenarios have been identified:

- reduction in training, which may lead to insufficient level of competence,
- increased used of subcontractors and chaining,
- deficiencies in the competence of the organisation's responsible persons and
- timeliness of the management of change and its impact on decision-making.

Action:

As part of their safety management, commercial air transport organisations must address the above scenarios identified at the national level and threats that they have identified themselves in respect of their own operations, define an acceptable level of safety and, if necessary, take action to reduce risks to an acceptable level.

Traficom includes the scenarios in organisations' risk-based oversight. The oversight of organisations includes ensuring their ability to adapt their operations and manage the risk level of their operations in prevailing conditions and implement possible changes while making genuine and efficient use of the management of change and risk management processes.

(Note: Shortcomings in the management of change are also connected to the systemic level action SYS.007.2, Management of change as part of safety management, which is obligatory to all aviation organisations that are required to implement an SMS.)

Objective of the action:

Implementing Finnish aviation safety risk management in the commercial air transport domain by ensuring that the risks related to the threat scenarios described above are maintained at an acceptable level.

Stakeholder responsible for implementation:

AOC operators (aeroplanes and hot air balloon operations) Traficom

Timetable

2025-2026

Deliverable

The action described above has been addressed in commercial air transport organisations' safety management and the results have been processed in connection with Traficom's oversight.



Status

Implementation underway

SYS.CAT.002. Flight data monitoring (FDM)

SYS.CAT.002.1, Safety promotion in the use of FDM systems as part of safety management

EPAS reference: MST.0003: Member States should maintain a regular dialogue with their national aircraft operators on flight data monitoring (FDM) programmes

Action:

Traficom ensures that the instructional materials on the FDM system or FDM data produced by it and other parties, such as the European Operators Flight Data Monitoring forum (EOFDM), relevant to safety management are available to aviation organisations. Traficom publishes guidance materials on its website where they are easily accessible and encourages organisations to use them. The website also includes information about the European working groups and forums whose work aviation organisations have an opportunity to participate in and/or influence.

The national FDM forum was active for approximately a decade. Traficom has replaced the forum with the Aviation Safety Forum that covers a wider range of themes in aviation safety. FDM issues can be addressed in connection with it as needed. A separate FDM forum may be organised in the future, if deemed necessary.

Objective of the action:

Supporting organisations in using FDM systems as part of their safety management, raising awareness of best practices and safety benefits, enabling confidential dialogue and sharing of safety information between industry stakeholders and Traficom, and encouraging FDM operators to use the guidance material produced by European cooperation forums or other existing useful material. <u>Guidance material is available on the EASA website via this link.</u>

Stakeholder responsible for implementation: Traficom

Operators producing FDM data: participating in stakeholder events and promoting best practices in aviation safety work regarding FDM systems and their use

Timetable

Continuous

Deliverable

Efficient use of FDM systems in safety work

Status

<u>The 2024 Aviation Safety Forum</u> was held on 20 November 2024. The 2025 Aviation Safety Forum will be held on 12 November 2025.

4.3.5 Safety of non-commercial operations with complex motor-powered aircraft

SYS.NCC.001, Safety of non-commercial operations with complex motor-powered aircraft

At the systemic level, the following key scenarios in the national risk picture were identified in the domain of non-commercial operations with complex motor-powered aircraft (NCC):

- development of organisations' threat identification and risk management
- shortcomings in regard to organisations' management of change (MoC) processes acknowledging rapid changes and multiple changes occurring at the same time, including the restart/recovery phase after the changes
- shortcomings in the organisation's own compliance monitoring

Action:

As part of their safety management, NCC operators must address the above scenarios identified at the national level and threats that they have identified themselves in respect of their own operations, define an acceptable level of safety and, if necessary, take action to reduce risks to an acceptable level.

Traficom includes the scenarios in organisations' risk-based oversight.

Shortcomings in the management of change are also connected to the system-level action SYS.007.2, *Management of change as part of safety management*, which is obligatory to all aviation organisations that are required to implement an SMS.

Objective of the action:

Implementing Finnish aviation safety risk management in the NCC domain by ensuring that the risks related to the threat scenario described above are maintained at an acceptable level.

Stakeholder responsible for implementation:

NCC operators (aeroplanes) Traficom

Timetable

2025-2026

Deliverable

The action described above has been addressed in NCC operators' safety management and the results have been processed in connection with Traficom's oversight.

Status

Implementation underway

4.3.6 Ground handling safety

SYS.GH.001, Ground handling safety

The following were identified as key scenarios in the national safety risk picture in the ground handling (GH) domain:

- correct procedure is not followed while fuelling when passengers are on board/boarding/disembarking
- incorrect or deficient loading of the aircraft
- shortcomings in immediate information provision when a ground handling vehicle collides with an aircraft (including immediately informing the crew and technical staff and occurrence reporting)
- shortcomings in guiding and supervising passengers on the apron.

At the systemic level, the following key scenarios were identified:

- a subcontractor operates incorrectly, but the organisation procuring the service does not sufficiently ensure safe operation in direct subcontracting and especially in subcontracting chains
- due to shortcomings in SMS performance, the system does not identify safety threats and/or is incapable of managing safety risks
- due to tight schedules, ground handling functions are performed incorrectly or neglected
- shortcomings in the management of change (MoC) in regard to changes occurring in the GH operating environment

Action:

As part of their safety management, organisations must address the above key scenarios in ground handling identified at the national level and ground handling threats that they have identified themselves in respect of their own operations, define an acceptable level of safety and, if necessary, take action to reduce risks to an acceptable level.

Traficom monitors the number and risk level of events related to ground handling and ground operations, defines the required actions as part of Finnish aviation safety risk management and assesses how organisations have addressed and processed threats related to ground handling and ground operations. Traficom participates in ground handling safety work in EASA's working groups, such as the GH-CAG group and the working group preparing new ground handling regulation, and shares information about new <u>EU-level ground handling regulation</u> under preparation.

Objective of the action:

Implementing Finnish aviation safety risk management in the GH domain by ensuring that the risks related to the threat scenarios described above are maintained at an acceptable level.

Stakeholder responsible for implementation:

GH organisations AOC organisations Traficom



Timetable

2025-2026

Deliverable

The action described above has been addressed in the safety management of ground handling organisations and in the safety management of the organisations using ground handling services. Traficom includes the identified key scenarios in its oversight plan as one of the oversight priorities.

Status

Ongoing

4.3.7 Airworthiness and maintenance safety

SYS.AIR.001, Airworthiness and maintenance safety



Two scenarios were identified as key scenarios in the national safety risk picture in the airworthiness and maintenance (AIR) domain:

- A mistake is made in airworthiness management, causing a maintenance task or AD to be neglected.
- Maintenance staff carry out their work incorrectly, leading to an aircraft being released to service even though it is not airworthy.
- A device is installed incorrectly, resulting in non-compliant aircraft (maintenance) operation.
- Maintenance staff act or use an aircraft system incorrectly, causing damage or an incident.

Action:

As part of their safety management system or in the absence of SMS, continuing airworthiness management organisations (CAMO), maintenance organisations (145), production organisations (POA), combined airworthiness organisations (CAO) and CAO.UAS organisations must, in their operations, process the above key scenarios identified at the national level and threats that they have identified themselves in respect to their own operations, define an acceptable level of safety and, if necessary, take action to reduce risks to an acceptable level.

Traficom includes the scenarios in its oversight plan as one of the oversight priorities.

Objective of the action:

Implementing Finnish aviation safety risk management in the AIR domain by ensuring that the risks related to the threat scenarios described above are maintained at an acceptable level

Stakeholder responsible for implementation:

CAMO-, 145-, POA-, CAO- and CAO.UAS-organisations Traficom

Timetable

CAMO 2022-145: 2024POA: 2025– CAO and CAO.UAS: Recommendation

Deliverable

The threat scenarios described above have been addressed in the organisations' safety management and the results have been processed in connection with Traficom's oversight.

Status

Implementation underway



Image: Jani Hottola

4.3.8 General aviation safety

Background:

General aviation refers to all other manned aviation apart from commercial air transport and aerial work. At the European level, key risks of non-commercial aviation have been described in EPAS volume III, Safety Risk Portfolios, 2025 Edition and in EASA's Annual Safety Review 2024. The following remain key risks:

- Control of aircraft (preventing loss of control, or LOC-I events),
- Risks associated with parachuting operations
- Risks associated with in-flight decision-making
- Inadvertent flight into IMC/scud running.

EPAS actions strengthen protection measures for reducing systemic risks related to e.g. **taking into account meteorological conditions** and **managing the flight**, including iConspicuity, which means maintaining situational awareness during flight in relation to real-time information obtained from various digital systems, e.g. GPS navigation and meteorological data, and discernibility in relation to others.

Traficom works on the safety of general and recreational aviation as set out in **Finland's operating model for recreational aviation safety work** developed in a <u>recreational aviation safety project in 2015</u>. In addition to Traficom, Finavia, Fintraffic ANS, the Finnish Meteorological Institute, the Finnish Aeronautical Association (SIL) and AOPA Finland (SMLL) are committed to the operating model. In the operating model, the stakeholders committed to complying with the model discuss the safety situation annually and specify priorities for safety work and needs for action during the year. These needs and priorities are also used as themes of the Lentoon! seminar that those stakeholders organise together each year.

OPER.GA.001, Airspace infringements

EPAS reference: MST.0028: Member States to establish and maintain a State Plan for Aviation Safety

Information on airspace infringements (AI) and the related safety situation is available on the Tieto.Traficom.fi website (<u>AI data on the Tieto.Traficom.fi</u> <u>website</u>).

Action:

Airspace infringements (AI) are one factor identified to contribute to mid-air collisions (MAC). Airspace infringements (AI) do not currently emerge as a key threat in general and recreational aviation in Finland, but several actions have been implemented over a number of years to mitigate the risks associated with them. AI events and their risk levels are monitored as part of Finnish aviation safety risk management. Should any needs for additional actions be identified, the operating model of Finnish recreational aviation safety work will be used. As regards the background factors affecting airspace infringements, threats caused by airspace complexity are also addressed with action SYS.GA.003 *Identification of the safety aspects of airspace complexity and changes therein and the utilisation of air traffic control in general aviation*.

Objective of the action:

Reducing AI and MAC risks

Stakeholder responsible for implementation:

Stakeholders committed to the operating model for Finnish recreational aviation safety work: Traficom, Finavia, Fintraffic ANS, Finnish Meteorological Institute, Finnish Aeronautical Association (SIL) and AOPA Finland (SMLL)

Timetable

Continuous

Deliverable

AI and MAC risk management.

Status

Progressing as planned. Links to AI safety material:

- <u>https://tieto.traficom.fi/en/statistics/airspace-infringements</u>
- https://www.traficom.fi/fi/liikenne/ilmailu/asenne-ratkaisee
- As a member of the SPN network, Finland participates in a <u>safety campaign on</u> preventing MAC/AI events in general and recreational aviation (EPAS 2018– 2022, action SPT.089).

SYS.GA.002, Safety promotion in GA

EPAS reference: MST.0025: Improve the dissemination of safety messages

Action:

Key elements of safety promotion associated with the Finnish operating model for recreational aviation safety work include the **annual Lentoon! seminar** and **effective safety promotion and sharing of best practices** using different communication channels. The cooperation described above continues within the

framework of the operating model. Stakeholders meet annually before the beginning of the flying season to discuss and make decisions on essential topical themes for safety promotion.

The key theme chosen for 2025 is "using real-time airspace data". The

theme chosen by the cooperation group for the operating model refers, in particular, to forming a situational picture of the dynamic airspace and other traffic with the help of tools designed to facilitate the process (e.g. Fintraffic Sky + ADS-B UAT to be published in the spring). Flight preparation also remains an important theme.

Objective of the action:

Improving safety promotion as an essential systemic safety factor, thus improving general aviation safety.

Stakeholder responsible for implementation:

Stakeholders committed to the operating model for Finnish recreational aviation safety work: Traficom, Finavia, Fintraffic ANS, Finnish Meteorological Institute, Finnish Aeronautical Association (SIL) and AOPA Finland (SMLL)

Timetable

Continuous

Deliverable

Effective, risk-based safety promotion

Status

The 2024 Lentoon! seminar was held on 27 April 2024 as a webinar. The rotating host responsible for organising the seminar was AOPA Finland. The seminar material is available via <u>this link</u>. The 2025 Lentoon! seminar will be organised by Finavia. The seminar will be held as an in-person event on 24 May 2025.

In 2024 and in early 2025, Traficom published several <u>Safety Bulletins</u> that included instructions for general and recreational aviators (mainly in Finnish):

- 3 May 2024: <u>Spring reading for pilots</u>
- 30 September 2024: <u>Winter operations bulletin for operators in general and</u> <u>recreational aviation</u>
- 1 October 2024: <u>Winter operations bulletin for operators in general and</u> <u>recreational aviation</u>
- 3 February 2025: <u>Aviation Safety Review 2024</u> (a separate section on general and recreational aviation)

EASA has also released a video related to the topic on its YouTube channel: <u>GA</u> <u>Season Opener Day 1 - Be Ready and Fly Safely Introduction - YouTube</u>

SYS.GA.003 Identification of the safety aspects of airspace complexity and changes therein and the utilisation of air traffic control in general aviation

MST.0038 Airspace complexity and traffic congestion

Action:

Traficom ensures that the safety impacts of airspace complexity and airspace changes have been identified, that the risks associated with them have been assessed and that the required actions have been taken in accordance with organisations' risk management processes. In addition to this, Traficom ensures that the issue has also been taken into consideration in the national aviation risk picture.

Traficom participates in developing best practices for preventing mid-air collisions (MAC) and airspace infringements (AI) through EASA's GA TeB (*General Aviation Technical Advisory Body*).

In the cooperation group on the *Operating model for Finnish recreational aviation safety work*, Traficom seeks to identify ways to reduce MAC and AI risks, including best practices for encouraging pilots in general and recreational aviation to use the air traffic control service in the event of occurrences and incidents and, in particular, to proactively prevent occurrences and incidents.

Objective of the action:

Reducing MAC and AI risks

Stakeholder responsible for implementation:

Traficom Co-operation group on the Operating model of Finnish recreational aviation safety work

Timetable

Continuous 2025

Deliverable

Assessment of the safety impacts of airspace complexity and airspace changes and the management of associated risks; the appropriate use of air traffic control services in general and recreational aviation

Status

Traficom oversees the organisation responsible for airspace design in a performance- and risk-based manner (see FASP section 3). Traficom maintains the national risk picture (see FASP section 2.6).

The GA TeB group started operating in 2016. Traficom's representative is the chair of the group.

The cooperation group on the *Operating model of Finnish recreational aviation safety work* has highlighted an urgent need for a functional tool with the help of which dynamic airspace changes could be communicated in real-time. Fintraffic ANS has a project in progress in relation to this.



4.3.9 Safety of unmanned aviation (Drones)

No EPAS reference: EPAS has no actions directly assigned to the Member States. The actions listed below were specified on the basis of nationally identified needs for actions.

Background:

Unmanned aviation is an aviation domain that is experiencing strong growth. Unmanned aircraft are operated within the limits specified by the EU Regulation on unmanned aviation (Implementing Regulation (EU) 2019/947) starting from 31 December 2020. The provisions became applicable to model aircraft clubs as from the beginning of 2023, and equipment were governed by transitional provisions until the beginning of 2024. There are no specific SMS requirements for organisations other than LUC organisations, but operators are required to ensure the safety of their own activities, be aware of the risks of their own activities and, if necessary, use risk-based risk management methods. When the specified risk level is exceeded, the operator must apply for an authorisation or a certificate.

Coordinating the growing volume of unmanned aviation with traditional, manned aviation requires new ways of thinking and assessing risks and the implementation of actions to mitigate risks. The automation of air transport and the overall digitalisation of transport also introduce new needs in terms of traffic control and coordinating traditional and roboticised transport. The transition to EU regulation has provided new tools for risk management.

Delegated Regulation (EU) 2019/945 sets out requirements for equipment that bears a class C identification label. From the beginning of 2024, new drones placed
on the market must bear a class C identification label in order to be allowed for use in the 'open' category.

Drones with a C classification have technical features that improve safety. One of the features is geo-awareness, meaning that the drone can identify its location on the map and compare it with the UAS airspaces. This reduces various risks related to airspace and collisions. Traficom has published Finnish UAS airspaces in a harmonised digital format that can be used by the geo-awareness function of class C drones.

As from the beginning of 2024, more technical equipment requirements were also added to drones used in the 'specific' category. Now these drones must have a remote identification system that can be used to identify the drone and its operator remotely.

In Europe, no harmonised view has yet been established of the information that should be presented through the geo-awareness function. A solution for the issue is sought by a working group coordinated by EASA.

As a new element for increasing safety, the U-space Regulation (EU) 2021/664 has been published at the European level. This will enable a traffic control system for unmanned flights and better coordination of manned and unmanned aviation. The Regulation has been applied since 26 January 2023. The U-space regulatory framework also includes additional requirements for ATS providers and manned aviation. These additional requirements have been adopted in the ATM/ANS and SERA Regulations by Commission Implementing Regulations (EU) 2021/665 and (EU) 2021/666. National legislation complementing the U-space Regulation was implemented through amendments to the Aviation Act, which entered into force on 20 February 2023.

SYS.DRONE.001, Risk management

As part of national risk management (see FASP, section 2.6), Traficom also produces and maintains a national UAS/drone risk picture. The key scenarios identified in the national risk picture have changed significantly in some respects as a result of the EU Drone Regulation becoming applicable. The risk picture has been updated to correspond to the new situation following the



comprehensive transformation of the industry. The current identified and updated key risk scenarios at the systemic level are:

- lack of knowledge of regulation and the obligations thereof regarding safe operations, encompassing
 - operators who are unaware that they should be familiar with the obligations related to drone operations
 - \circ $\;$ operators who do not understand the content of the obligations
- incorrect attitudes, encompassing
 - operators who, for whatever reason, do not operate in compliance with regulatory obligations
 - o operators who knowingly operate in violation of obligations and regulations

• difficulties in coordinating manned and unmanned aviation and making them visible to each other.

In terms of this point, one of the key problems is making manned aviation visible to unmanned aviation in uncontrolled airspaces via digital means, as the so-called see-and-avoid principle used in manned aviation when operating under visual flight rules (VFR) is an inadequate concept for coordinating manned and unmanned aviation in the same airspace. Instead, possible solutions need to be sought from the realms of digitalisation and automation.

Action:

Traficom strives to reduce the risks of unmanned aviation related to the risk scenarios described above by the following means:

Operators have personal responsibility for risk management; operators must assess the risks of their operations and plan the measures required to keep these under control. As regards operations with a higher risk level, Traficom addresses these risk assessments and oversees the operators using a risk-based approach. Traficom:

- promotes the safety of drone activities and improves operators' knowledge of regulation and safe operation by the means described in action SYS.DRONE.002, Safety promotion;
- issues decisions or regulations that can be used to establish prohibited, restricted and allowed UAS geographical zones, which serve in their part to mitigate the risk of mid-air collisions between unmanned and manned aircraft either via restrictions or by increasing awareness of flight zones;
- can establish U-Space airspaces and allowed UAS geographical zones based on its risk assessment;
- engages in cooperation with the police and promotes the making of identified and required legislative changes;
- participates in discussions on Counter UAS (C-UAS) functions with aviation organisations and other authorities, if necessary.

Objective of the action:

Reducing the risks of unmanned aviation

Stakeholder responsible for implementation:

Operators using remotely piloted aircraft Traficom

Timetable

2025-2026

Deliverable

Threat scenarios have been addressed to a sufficient degree in the safety assessments of operators using remotely piloted aircraft. The risk level of unmanned aviation is maintained at an acceptable level with Traficom's and operators' actions.

Status

Traficom's actions are progressing as planned. Allowed UAS geographical zones have been established around drone ports. Drone port locations have been

incorporated into aeronautical charts to ensure that manned aircraft are more aware of the existence of these ports. Authorisations of the Finnish Border Guard, the Finnish Defence Forces, the Finnish Customs and the Prison and Probation Service of Finland to intervene in unauthorised drone operation in their respective spheres of responsibility have been described in more detail in legislation. Information campaigns to increase awareness of drone operation have been published through different channels (television, radio, print media, social media). Cybersecurity instructions for recreational operators of unmanned aircraft were published in 27 March 2024.

SYS.DRONE.002, Safety promotion

Action:

Traficom uses a number of channels to communicate information about safe operation to professionals and hobbyists. Traficom also updates and maintains the website <u>droneinfo.fi</u> for drone operators to support safety promotion and the safe operation of drones and monitors the numbers of visitors on the website. Traficom publishes bulletins and newsletters for drone operators and, if necessary, organises events for drone operators.

The Ministry of Transport and Communications' National Transport Safety Strategy for 2022–2026, covering the entire transport system, was published in March 2022. The strategy discusses the safety of all modes of transport from the perspective of attitudes, competence, automation and cybersecurity, for example. Regarding safety in aviation, the strategy addresses the safety of unmanned and recreational aviation. The strategy's measures concerning aviation were worked on by a working group, which consisted of representatives of aviation stakeholders, including Traficom. The results of national risk management and the actions included in the Finnish Plan for Aviation Safety valid at the time were also utilised in the definition of aviation-related measures. The Ministry of Transport and Communications coordinates the implementation of the strategy and leads the operations of the monitoring group overseeing the implementation. In addition, an event on transport safety (Liikenneturvallisuusfoorumi) is held annually to report the progress of the implementation and discuss timely topics related to transport safety. Traficom implements the drone measures assigned to it in the strategy and is an active cooperation partner in the implementation of measures for which Traficom has been named as a cooperation partner.

In its own role, Traficom promotes U-space development in Finland and influences international regulatory work. Traficom also participates in the EASA SPN working group, and coordinates associated European actions for promoting the safe operation of drones at the national level.

Objective of the action:

Reducing risks in unmanned aviation

Stakeholder responsible for implementation: Traficom

Timetable Continuous

Deliverable

Communications targeting customers on several platforms (droneinfo.fi, social media, bulletins, newsletters). Communications efforts have a strong emphasis on social media for the purpose of reaching young drone operators.

Status

Actions are progressing as planned

Appendix: List of actions by stakeholder groups

Measures only assigned to Traficom (indirect impacts on aviation organisations)

- SYS.004.2, Aviation safety, security and cybersecurity occurrence reporting coordination mechanisms
- SYS.HECO.004, Survey of the impact of regulatory obligations from the perspective of small operators
- SYS.005.1, Safety promotion in relation to safety management systems (SMS)
- SYS.007.1, Assessment of safety management system (SMS) performance
- SYS.007.4, Assessment of the safety culture of AOC operators
- SYS.FOT.009.2, Resources and competence
- SYS.009.3, Cooperative oversight
- SYS.009.4, Performance- and risk-based operations management
- SYS.009.5, Fatigue Risk Management System (FRMS) utilisation and FRMS competence as part of risk management
- SYS.009.6, Strengthening competence in taking human factors and human performance into account in regulatory work
- SYS.009.7, PPL/LAPL learning objectives in the Meteorological Information part of the PPL/LAPL syllabus
- OPER.MAC.005.2, Loss of separation between civil and military aircraft (MAC)
- **NEW ACTION:** SYS.MED.009.8, Preventive mitigation of incapacitation risk
- SYS.HECO.001, Collaboration forums for helicopter safety
- SYS.HECO.004, Survey of the impact of regulatory obligations from the perspective of small operators
- SYS.DRONE.002, Safety promotion

Actions assigned to all aviation organisations and Traficom:

- SYS.001.1, Finnish Aviation Safety Programme
- SYS.002.1, Finnish Plan for Aviation Safety
- SYS.003.1. Finnish aviation safety performance targets and indicators
- SYS.004.1, Finnish aviation safety risk management
- SYS.005.4, Taking into account the recommendations of safety investigation authorities
- SYS.006.2, Improving the quality of incident reporting
- SYS.007.2, Management of change as part of safety management
- SYS.007.3, Governance structure
- SYS.008.1, Cybersecurity in aviation

Actions assigned to Traficom and other authorities with official obligations related to civil aviation or a connection to Traficom's duties as the civil aviation authority, e.g. the National Police Board of Finland, the public prosecutor and Safety Investigation Authority, Finland:

• SYS.006.1, Safety culture, reporting culture and just culture atmosphere

Actions assigned to individual groups of aviation organisations and Traficom:

Language proficiency examiners

• SYS.005.2, Promoting safety through proficiency in and use of English in aviation

AIR organisations

- OPER.FIRE.007.1, Fire, smoke and fumes
- SYS.AIR.001, Airworthiness and maintenance safety (CAMO, AMO, POA and CAO organisations)
- SYS.009.1, The oversight of Part-147 organisations (Part-147 organisations)

ATO organisations (aeroplanes and helicopters)

- OPER.LOC.001.1, Loss of control in flight (LOC-I)
- OPER.MAC.005.1, Mid-air collisions (MAC)
- OPER.CFIT.006.1, Controlled flight into terrain (CFIT)

• SYS.ATO.001, Safety of flight training

ATO organisations (aeroplanes)

- OPER.RE.002.1, Runway excursions (RE)
- OPER.RWY.003.1, Local runway safety teams (LRST)
- OPER.004.1, Runway incursions (RI)
- OPER.GCOL.008.1, Collisions while taxiing to or from a runway (GCOL)

ATO organisations (helicopters)

• SYS.HECO.002, Helicopter safety

ANS organisations

- OPER.LOC.001.1, Loss of control in flight (LOC-I)
- OPER.RE.002.1, Runway excursions (RE)
- OPER.RWY.003.1, Local runway safety teams (LRST)
- OPER.004.1, Runway incursions (RI)
- OPER.GCOL.008.1, Collisions while taxiing to or from a runway (GCOL)
- OPER.MAC.005.1, Mid-air collisions (MAC)
- OPER.CFIT.006.1, Controlled flight into terrain (CFIT)

ADR organisations

- OPER.LOC.001.1, Loss of control in flight (LOC-I)
- OPER.RE.002.1, Runway excursions (RE)
- OPER.RWY.003.1, Local runway safety teams (LRST)
- OPER.004.1, Runway incursions (RI)
- OPER.GCOL.008.1, Collisions while taxiing to or from a runway (GCOL)
- OPER.FIRE.007.1, Fire, smoke and fumes
- SYS.ADR.001, Airport safety

AOC organisations (aeroplanes and helicopters)

- OPER.LOC.001.1, Loss of control in flight (LOC-I)
- OPER.MAC.005.1, Mid-air collisions (MAC)
- OPER.CFIT.006.1, Controlled flight into terrain (CFIT)
- OPER.FIRE.007.1, Fire, smoke and fumes
- SYS.002.1, National FDM forum (operators producing FDM data)
- SYS.GH.001, Ground handling safety

AOC organisations (aeroplanes)

- OPER.RE.002.1, Runway excursions (RE)
- OPER.RWY.003.1, Local runway safety teams (LRST)
- OPER.004.1, Runway incursions (RI)
- OPER.GCOL.008.1, Collisions while taxiing to or from a runway (GCOL)
- SYS.CAT.001, Safety of commercial air transport

AOC organisations (hot air balloon operations)

- SYS.CAT.001, Safety of commercial air transport
- OPER.LOC.001.1, Loss of control in flight (LOC-I)
- OPER.MAC.005.1, Mid-air collisions (MAC)
- OPER.CFIT.006.1, Controlled flight into terrain (CFIT)

OPER.FIRE.007.1, Fire, smoke and fumes

- AOC and SPO organisations (helicopters)
- SYS.HECO.002, Helicopter safety

SPO organisations (aeroplanes and helicopters)

- OPER.LOC.001.1, Loss of control in flight (LOC-I)
- OPER.MAC.005.1, Mid-air collisions (MAC)
- OPER.CFIT.006.1, Controlled flight into terrain (CFIT)

SPO organisations (aeroplanes)

• OPER.RE.002.1, Runway excursions (RE)

- OPER.004.1, Runway incursions (RI)
- OPER.GCOL.008.1, Collisions while taxiing to or from a runway (GCOL)

NCC organisations (aeroplanes)

- SYS.NCC.001, Safety of non-commercial operations with complex motor-powered aircraft
- OPER.LOC.001.1, Loss of control in flight (LOC-I)
- OPER.RE.002.1, Runway excursions (RE)
- OPER.004.1, Runway incursions (RI)
- OPER.GCOL.008.1, Collisions while taxiing to or from a runway (GCOL)
- OPER.MAC.005.1, Mid-air collisions (MAC)
- OPER.CFIT.006.1, Controlled flight into terrain (CFIT)
- OPER.FIRE.007.1, Fire, smoke and fumes

GH organisations

- SYS.GH.001, Ground handling safety
- OPER.GCOL.008.1, Collisions while taxiing to or from a runway (GCOL)

UAS organisations

- OPER.MAC.005.1, Mid-air collisions (MAC)
- SYS.DRONE.001, Risk management

Actions to be implemented collaboratively in the framework of the operating model of Finnish recreational aviation safety work by the stakeholders committed to the model: Traficom, Finavia, Fintraffic ANS, Finnish Meteorological Institute, Finnish Aeronautical Association (SIL) and AOPA Finland (SMLL)

- SYS.006.1, Safety culture, reporting culture and just culture atmosphere
- OPER.GA.001, Airspace infringements
- SYS.GA.002, Safety promotion in GA
- SYS.GA.003 Identification of the safety aspects of airspace complexity and changes therein and the utilisation of air traffic control in general aviation

Deleted actions

• SYS.DRONE.003, Influencing in international aviation

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