

This document is a translation of the original assessment in Swedish by SHK of the response to the recommendation. In case of discrepancies between this translation and the Swedish original text, the Swedish text shall prevail in the interpretation of the assessment.

The Swedish Armed Forces

Swedish Accident Investigation Authority's report RL 2019:02

On 18 January 2019, the Swedish Accident Investigation Authority (SHK) published its final report RL 2019:02 regarding an accident at Järkö, Blekinge County on 10 March 2018 involving the aircraft SE-MCL of model PA-28-181, flown by the Swedish Volunteer Air Corps (FFK).

The report issued two recommendations, one of which to the Swedish Armed Forces.

The Armed Forces were recommended to consult with the Swedish Volunteer Air Corps (FFK) in order to complete the work of reviewing and clarifying the organisation and accountability structure in regard to Home Guard soldiers flying for FFK, clarifying the chain of command, and the occupational safety and employer responsibility.

The Armed Forces have submitted a response to the recommendation. According to this response, the Armed Forces have made the assessment that FFK, when operating flights on behalf of the Home Guard, has the occupational safety responsibility of the employer in applicable parts pursuant to Chapter 3, Sections 2–12 of the Work Environment Act (1977:1160). If FFK is instead conducting operations within the scope of a special decision by HKV PROD FPE, or within the Home Guard training system, the Armed Forces makes the assessment that the organisational unit that orders the training activities, and is thereby responsible for the joint workplace, is responsible for the coordination of work environment matters (see Chapter 3, Sections 7 d–e of AML). The Armed Forces therefore makes the assessment that the work environment responsibilities of the Armed Forces and FFK complement one another as intended. Based on this, the Armed Forces will cooperate with FFK in order to clarify the organisation and role division in terms of work environment responsibility when FFK is carrying out aviation activities within the scope of the Home Guard training system.

The recommendation issued to the Armed Forces contained three aspects, namely the chain of command, the employer responsibility and occupational safety. The response received from the Armed Forces only relates to one of these aspects, namely the matter of occupational safety.

A supplementary oral presentation of the response to the recommendation has indicated that the Armed Forces and FFK are in agreement in regard to the chain of command. However, SHK finds that some ambiguity remains, primarily regarding the Armed Forces view of employer responsibility. FFK has also

indicated that their organisation is not fully convinced that the Armed Forces' interpretation of the work environment regulations is correct. The Armed Forces' response does indicate that the dialogue will continue in this matter. However, all in all, SHK does not find that the Armed Forces have fully responded to the recommendation and it can therefore only be considered partially implemented. The response received from the Armed Forces can therefore only be considered partially satisfactory.

Kind regards

[Signature]
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