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International Civil Aviation Organization 999 Robert-Bourassa Boulevard Montréal, Quebec Canada H3C 5 H7

## Assessment; safety recommendation issued to ICAO

On 9 March 2017 the Swedish Accident Investigation Authority (SHK) published a report, RL 2017:03, concerning a serious incident at Gällivare Airport on 6 April 2016 involving the aeroplane YR-FZA of the model F28 Mark 0100, operated by Carpatair. In the report SHK issued a safety recommendation to ICAO.

On 21 June 2017 SHK received the ICAO reply to the recommendation.

According to Article 18.2 regulation (EU) No 996/2010 of the European Parliament and of the Council on the investigation and prevention of accidents and incidents in civil aviation, the safety investigation authority shall inform the addressee whether or not it considers the reply adequate and give justification when it disagrees with the decision to take no action.

According to ICAO the intent of the safety recommendation has been implemented in existing ICAO provisions. SHK does not agree.

Unlike a stabilized approach procedure, as specified in Doc 8168, part III, section 4, chapter 3, there is no ICAO provision regulating the procedure of the landing phase. The reference in the ICAO response to the safety recommendation to Annex 6, Attachment B, 7.4, is only guidance as to the level of performance intended by the provisions of Chapter 5 Aeroplane Performance Operating Limitations, and is according to the headline related to performance considerations *before* landing. There is also a considerable difference between a Standard (stabilized approach procedure) and Recommended Practices or Guidance materials (landing phase).

ICAO also states that adding a term such as "safe landing concept" can create confusion and be detrimental to safety. However the reasoning for this conclusion is not elaborated closer.

As stated in the final report a safe landing concept could include, but not be limited to the following:

- Crossing the threshold at appropriate speed.
- Monitor appropriate speed reduction from the threshold until touchdown.
- Touchdown on the appropriate, and agreed upon, point on the runway.

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- Initiate a go-around if appropriate speed, speed reduction, or touch down point is not achieved.
- Appropriate use of retardation devices such as speed brake, lift dumpers, reverse and brakes.

The term "safe landing concept" is only a description of the type of procedures that, in SHK:s opinion, is currently missing and could, if implemented, enhance safety.

Against this background SHK does not consider the reply adequate (Closed – not adequate response).

Best regards,

Mikael Karanikas

Chair Accident Investigations