

Swedish Transport Agency
Maritime and Civil Aviation Department
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Assessment of the Swedish Transport Agency's response to the recommendations in points R1 – R3 of the report RL 2016:02

On 1 March 2016, SHK published the final report RL 2016:02 concerning an accident on Björnö on 13 February 2015 involving aircraft N164ST of model PA46-500TP (Malibu Meridian). The report contained three recommendations to the Swedish Transport Agency (RL 2016:02 R1 – R3). The Swedish Transport Agency has responded to the recommendations.

When it comes to recommendations R1 and R2, the Transport Agency was recommended to investigate the requirements for CCTV cameras for investigation purposes to be installed at Swedish commercial airports and to work for that the issue of operational CCTV cameras on commercial airports for investigation purposes, is appropriately addressed in the international flight safety community.

In the final report RL 2016:02, SHK stated the following:

The Swedish Transport Agency shall work for the achievement of the transport policy objectives, including the adaption of formation, function and use of the transport system in such a way that nobody is killed or critically injured, the Agency should consider if the use of CCTV cameras, in the long term, could contribute to the meeting of those objectives.

The possible introduction of CCTV monitoring also raises questions about costs, possibilities to document aircraft movements during varying meteorological conditions like low visibility or precipitation, and ultimately the socio-economic benefits. The range of the equipment also varies from simple small webcams to major camera systems used for RTC (Remote Tower Control) where both costs and function vary considerably.

Which systems that could be suitable for use, and are economically justifiable is not possible to say in the current situation, even if it appears likely that it will be in the lower end of the range. The footage from the airport cameras would definitely found a wider basis for the authorities' investigations, and would contribute to more robust and safer analyzes, enhancing the opportunities to take adequate measures to prevent a reoccurrence.

A decision on these questions is depending on a closer evaluation of the conditions. Since it is primarily the safety investigating authority that benefits from any photodocumentation can such an evaluation be made in consultation with SHK.

It is evident from the Transport Agency's response that the agency has conducted an analysis and considered the matter. The Swedish Transport Agency has thereby concluded, inter alia, that the limitations in the use and the expected costs that this would entail are deemed by the agency to be too great to consider the benefits, especially because the effect of introducing camera surveillance only indirectly has a limited impact on safety in case of an investigation. According to the agency's analysis CCTV monitoring of the runway system at commercial airports is not a good idea. The Swedish Transport Agency has also stated that the agency questions the effect of such measures and how such requirements addressed to airport operators is a part of the agency's mission and responsibilities.

As the report shows and according to Regulation (2008:1300) with instruction for the Swedish Transport Agency, the agency shall work for the achievement of the transport policy objectives, including the adaption of formation, function and use of the transport system in such a way that nobody is killed or critically injured. Furthermore, the tasks shall focus on to contribute to an internationally competitive, environmentally sound and safe transport system. One way to work for increased safety is to conduct analysis of occurrences, both individual accidents and incidents and statistical trend analysis, to obtain a basis for proactive safety measures so that the regulator can take appropriate action where there are identified risks. Such investigations and analyzes are something that both SHK (individual accidents and incidents) and the Swedish Transport Agency (statistical trend analysis) does today. In order to carry out reliable analyzes the basis must be as comprehensive and robust as possible. Surveillance cameras could, as stated in the final report, contribute to this. It is therefore somewhat surprising that the Swedish Transport Agency questions how this is a part of the agency's mission and responsibilities, in particular when there are already requirements for technical equipment in the aircraft (CVR and FDR), which in principle has the same purpose.

When it comes to the analysis that the Swedish Transport Agency has conducted, SHK makes the following assessment. As SHK stated in the final report it is not possible today – without a closer study – to express an opinion of what camera systems that could be suitable for use and the cost of these. It is therefore surprising that the Swedish Transport Agency, without such a study, considered the agency able to assess the limitations as well as to conclude that the costs are too large to outweigh the benefit.

In light of the above, it is in SHK's opinion that recommendations R1 and R2 cannot be considered to have received due attention.

SHK deems the response to recommendation R3 satisfactory.

[Signed]
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Chair of the Investigation