

European Aviation Safety Agency
Rulemaking directorate
Mr. Jules Kneepkens
Rule making director

Postfach 10 12 53
D-50452 Köln

Re: Notices of Proposed Amendment (NPA) No. 2008-17c - Psychology

Vienna, 1.12.2008

Dear Mr. Kneepkens,

the "BÖP", the Austrian Association of Psychologists, represents 3800 members in Austria and Psychologists in different institutions. Most of the Aviations Psychologists listed with the Austrian Aviation Authority in regard to JAR-FCL 3 are members of the BÖP.

As in all other JAA-member countries, the JAA-Requirements had been implemented into national Austrian aviation law (2006). Because of the clear regulation that only Psychologists acceptable to the authority are allowed to provide a psychological evaluation (see JAR-FCL. 3.240 and JAR-FCL 3.360), a high qualification standard for licence applicants or holders is guaranteed. This is in accordance with the legislation, which requires in Austria that working on psychological issues can only be carried out by psychologists according to the law (for psychologists).

In Austria it is additionally required, that only psychologists knowledgeable in Aviation Psychology are allowed to perform such psychological evaluations (These Psychologists have to fulfil certain criteria to the Authority in order to be accepted).

The high level of qualification as well as quality in methods and execution of psychological evaluations seems to be especially important in regard to the well known fact, that up to 80% of all accidents are caused by human factors. The increasing technological complexity and further increasing demographical change of the flight crew would require even more assistance from aviation psychologists in the future.

The sharp decline in the accident rate since the early 1960s is the result of advancements in technology, equipment, operating procedures and training practices. Reductions in human error-related accidents, however, have not kept pace with the reduction of accidents related to mechanical and environmental factors. In fact, humans have played a progressively more important causal role in both civilian and military aviation accidents as aircraft equipments have become more reliable.

Unfortunately, the current EASA-FCL-NPA medical draft will reduce this high standard of quality. Psychological evaluations will be required without determining the demands to qualify as a psychological examiner as done in the JAR-FCL 3.240 / JAR-FCL 3.3.60. Who will guarantee the education and qualification of the person that works with the applicant? This open situation will give space to a lot of less qualified professionals and lead to problems for the applicants as well as for the authority. If someone not allowed by the applicable law will carry out psychological evaluations legal discussions next to safety ones can be predicted.

In order to provide a clear regulation regarding psychological evaluations that considers both national legislations as well as certain standards and qualifications of the protagonists, the BÖP recommends a revision of the current NPA in the sense of at least the current JAR-FCL 3 level for "Psychological Requirements" and offers it's support with the assistance of experienced Aviation Psychologists.

Sincerely,

Mag. Ulla KONRAD
President BÖP

Dr. Alois Farthofer
Task Force Aviation Psychology

In copy to:
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