

EASA Comment-Response Tool (CRT)
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Zurich-Airport / May 23, 2015

Regarding: NPA 2015-02 Systematic review and transposition of existing FAA TSO standards for parts and appliances into EASA ETSOs

The C 167 is a US-TSO which does not yet exist within EASA (see draft NPA 2015-02). Any DO/PO can apply it and it is also quoted under the name of TSO C 167 in the EASA CM-CS-005.

The implementation of C 167 as an ETSO might be problematic: due to its many references to US organisations and authorities, C 167 cannot be transferred to the European area governed by EASA. PPE (Personal Protective Equipment) against fall, are simple PCDS, in conformity with the harmonised EN standards, have been used for decades in the fields of air and alpine rescue and occupational health and safety.

Every single day, members of technical crews, task specialists, HHOs, loadmasters and air and alpine rescuers use such PCDS for both onshore and offshore applications. The range of experience with these devices is multiple and extremely broad, so we don't see any reason for an obsolete TSO, which is moreover clearly meant for the US, should be transferred to the European judicial area.

Often enough it happens that C 167-certified products, such as a securing belt for hoist operators, contradict anything we have learned in the past 10 years about ergonomics, current safety standards and state-of-the-art manufacturing. One of the reasons for this might be that it is the helicopter manufacturer (TC holder) who is dealing with issues beyond its core competencies.

Due to the above mentioned reasons, the implementation of TSO C 167 as an ETSO would represent a step backwards. In other words: the implementation of an ETSO C 167 would have no noticeable impact on safety.

Moreover, we wonder why should EASA accept the TSO C 167 and, even worse, why should the Agency be ready to implement it as an ETSO when the US is not prepared to acknowledge our EN standards?

This is protectionism. All complex PCDS (cages, baskets, rescue nets, fixed ropes for 3 or more individuals, etc.) must be certified in accordance with CS-27./29. and hence undergo the STC procedure.



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