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| Safety Recommendation Number: | IRLD2025006 |
| AAIU Event Reference: | IRL00922036 |
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| Safety Recommendation Status: | In process of implementation |

Safety Recommendation:

EASA should, in conjunction with the relevant stakeholders, conduct a review of TC/STC FDR system approvals issued since 2009 that predate for compliance with CS 29, (Certification Specifications, Acceptable Means of Compliance and Guidance Material for Large Rotorcraft) Amdt. 9, issued 14 June 2021, in order to identify and rectify any gaps for operators in the handling of flight recorder recordings, preservation, production, protection and use.

Response:

In a letter dated 30 January 2026, The European Union Aviation Safety Agency provided the following response to Safety Recommendation IRLD2025006:

Intermediate response:

The European Union Aviation Safety Agency (EASA) acknowledges the Safety Recommendation (SR) addressed by the Air Accident Investigation Unit (AAIU) of Ireland and underlines that the matter is already well-known to the Agency and was thoroughly addressed during the development of Notice of Proposed Amendment (NPA) 2019-12, which was subject to public consultation and remains available on the EASA Website at

<https://www.easa.europa.eu/en/document-library/notices-of-proposed-amendment/npa-2019-12>.

A key objective of NPA 2019-12 was to ensure that Flight Data Recorder (FDR) raw data can be converted into flight parameters expressed in engineering units, thereby avoiding incomplete or inaccurate FDR data and preventing unnecessary delays in accident investigations.

As an outcome of this rulemaking activity, and as also acknowledged in the SR text, CS-29 Amdt. 9, issued in June 2021, introduced an amended Acceptable Means of Compliance (AMC) 29.1459, which in its subparagraph 4 clearly addresses the potential gaps highlighted by the AAIU in the accident report, following the difficulties encountered during the investigation in handling FDR raw data.

The amended AMC ensures the availability of adequate Instructions for Continued Airworthiness (ICA) and FDR decoding documentation for operators, with the aim of mitigating the safety risks associated with missing or unusable recorded data after an accident or incident, thereby providing a safety benefit for future certifications.

However, within the framework of NPA 2019-12, it was not considered proportionate to mandate a retrofit for already certified FDR installations.

In parallel, and with the same objective of ensuring the proper conversion of FDR raw data into flight parameters expressed in engineering units, EASA also issued Safety Information Bulletin (SIB) 2009-28 (Revision 1 issued in 2015 available at <https://ad.easa.europa.eu/ad/2009-28R1>). This reflected the Agency's position that the safety concern did not constitute an unsafe condition warranting an Airworthiness Directive (AD) under Regulation (EU) 748/2012, point 21.A.3B of Annex I (Part 21).

Despite this, prompted by this SR, EASA took the opportunity to launch a complementary review with Type Certificate (TC) and Supplemental Type Certificate (STC) holders of FDR system approvals issued since 2009 that predate compliance with CS-29 Amdt. 9. The objective of this review is to identify and, where necessary, rectify any gaps affecting operators in the handling of flight recorder recordings, preservation, production, protection and use.

The outcome of this ongoing review will be communicated to the AAIU through a revised response to this SR by the end of 2026.

AAIU Comment:

The AAIU considers this Safety Recommendation as 'In process of implementation'.