

Position Statement on EASA Survey – SI-4023

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Thank you for the opportunity to provide feedback on the EASA survey regarding Safety Issue SI-4023:

“Risks associated with parachuting operations.” As a long-standing operator in the parachute industry and representative for skydiving aircraft coordination in Austria, I would like to contribute the following points for consideration.

1. Situation in Austria

In Austria, there are only two operators conducting parachute operations under SPO. The majority of skydiving operations are conducted under NCO within volunteer-based clubs, typically with CPL-licensed pilots.

These organizations have limited administrative and personnel resources.

2. On the Accident Statistics

We believe the accident figures cited in the draft report are not entirely accurate. Some of the accidents listed involved aircraft also used for parachuting but were not directly related to parachute activity and did not involve parachutists. This distinction is important.

During the 6 May 2025 workshop, this issue was raised. While it is acknowledged that the nature of parachute operations—including frequent rotations and time-pressured descents—can challenge pilots and potentially lead to errors, these factors pertain to general flight operations rather than parachuting itself.

Thus, these incidents should not be categorised under parachute-related accidents.

3. Commitment to Safety Culture

We strongly support measures that promote safety in both flight and parachute operations. In particular, pilot and parachutist training should emphasize awareness of the specific risks involved in drop operations.

Pilots must be educated about stress, dehydration, and hypoglycemia, all of which may impact performance.

Parachutists, in turn, must understand their responsibilities as participants in aviation activities, including weight and balance awareness and aircraft-specific procedures.

4. Evaluation of Proposed Strategies

We consider Strategy 2 (“Light management system and declaration for NCO operations”) to be the most realistic and sustainable option. This approach would introduce proportionate

requirements for NCO operators, helping to improve oversight and awareness without overwhelming small, volunteer-based clubs.

Requiring full SPO compliance, as in Strategy 3, would impose significant administrative burdens and could lead to the closure of many small operations, which would not benefit the sport or the safety community.

5. Practical Measures and Tools

The ÖAeC's working group on drop operations has developed a guideline that outlines key elements to be included in parachute operations manuals. We believe such tools are essential in helping operators meet safety standards. The guideline is available at: www.aeroclub.at.

These kinds of resources are far more effective than additional regulation, particularly for small operators. We recommend promoting education, awareness, and voluntary compliance with clearly defined best practices.

6. Final Remark

More rules do not necessarily equate to more safety. Targeted education and training—for both pilots and parachutists—are likely the most effective ways to improve safety outcomes. We strongly recommend avoiding the introduction of new formal ratings, which do not always reflect true operational competence. Instead, practical guidelines like the one created by ÖAeC should be supported and promoted.

Sincerely,

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