



**PENELOPE SCHOFIELD – HM SENIOR CORONER FOR AREA OF WEST SUSSEX  
INVESTIGATION INTO THE DEATHS OF REBECCA DOBSON, JASON HILL, STUART  
HILL, ELEANOR UDALL AND JONATHAN UDALL**

**CIVIL AVIATION AUTHORITY RESPONSE TO A REPORT ON ACTION TO PREVENT  
OTHER DEATHS PURSUANT TO PARAGRAPH 7, SCHEDULE 5 OF THE CORONERS  
AND JUSTICE ACT 2009 AND REGULATIONS 28 & 29 OF THE CORONERS  
(INVESTIGATIONS) REGULATIONS 2013**

The UK Civil Aviation Authority ('CAA') responded to the Senior Coroner's report on action to prevent other deaths pursuant to Regulation 29 of the Coroners (Investigations) Regulations 2013 on 13 January 2022.

In that response, the CAA confirmed that it was willing provide the Senior Coroner with a supplemental report on the progress of its work on or before 31 July 2022.

The purpose of this report is to set out the work undertaken by the CAA since 13 January 2022 and explain its future actions.

**Update**

As recognised by the Senior Coroner, the design and certification requirements relevant to fitting crash resistant fuel systems ('CRFS') in rotorcraft operating in the UK are contained within Certification Specifications CS 27-952 and CS 29-952<sup>1</sup>. These Certification Specifications now include requirements for CRFS capability in all new Rotorcraft types.

The CAA reviewed the UK Rotorcraft accident data relevant to the specific concerns raised by the Senior Coroner. The accident data relevant to operations in the UK does not highlight an imminent safety risk to passengers who are travelling in previously certified Rotorcraft without CRFS provisions fitted, or to the general public, such that an unsafe condition exists requiring an immediate change to the design and certification requirements or a U.K. wide safety directive.

---

<sup>1</sup> EU Regulation 748/2012 Annex 1 Part 21 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018.

The matters raised by the Senior Coroner will continue to be supported by the CAA and will form part of a longer-term strategy for rule changes to previously certified Rotorcraft. Any proposals put forward by the CAA will be based on the outcome of international safety studies and work conducted by the European Aviation Safety Agency ('EASA') and the U.S. Federal Aviation Authority ('FAA') which have both been based on the Rotorcraft Occupancy Protection Working Group (ROPWG) final report.

The CAA has already held meetings with representatives of both EASA and the FAA to ensure that it is working collaboratively with European and U.S. policy teams on this issue. In addition, the CAA intends to work with U.K. industry and operators to raise public awareness and encourage best practice.

Safety promotion in the U.S. has included inviting owners and operators of Rotorcraft, which have been certificated without compliance with later CRFS related requirements, to consider a partial solution to the safety risk, pending mandating any substantive rule change for all Rotorcraft, such as fitting tear resistant bladder inserts to fuel tanks.

### **Next Steps**

Based on the work carried out to date, including a preliminary assessment of the impact on owners and operators, the CAA is considering safety proposals for existing Rotorcraft on the UK register to be incorporated into the aviation legislation and policy rulemaking programme.

The CAA's recommended safety proposals will be based on the outcome of international safety studies and implementation work conducted by EASA and the FAA.

These proposals will be retrospective and targeted into Part 26 for existing type designed Rotorcraft,<sup>2</sup> and will require the CAA to undertake a period of consultation with owners and operators as part a wider impact assessment.

---

<sup>2</sup> EU Regulation 2015/640 on additional airworthiness specifications for a given type of operations Annex 1 Part 26 as retained (and amended in UK domestic law) under the European Union (Withdrawal) Act 2018

In the meantime, the CAA will continue to carefully monitor Rotorcraft safety in the U.K. following the recommendations issued by the Senior Coroner and encourage owners and operators of Rotorcraft in the U.K., particularly those performing commercial air transport operations to consider enhancing safety by voluntarily fitting CRFS design provisions, including, tear resistant bladder inserts to fuel tanks pending any future mandatory rule changes.

The CAA will also implement a targeted promotion strategy to the Rotorcraft aviation community.

**CAA**

**29 July 2022**