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Safety management systems, not only in the field of civil aviation, rely on **occurrence reporting or notification systems as a fundamental tool for monitoring, controlling, and improving safety on a day-to-day** basis. These reporting systems work well when they are built on two basic ideas: **reporting must be easy**, and the **people who report must feel protected**. On the one hand, a **reporting system must be simple, clear, and accessible**. It does not work well to ask people to report occurrences if the process is complicated, unintuitive, or creates doubts that may affect the quality and completeness of the report, or even directly discourage reporting altogether. Obviously, it must comply with the applicable rules and requirements, but without becoming a burdensome or difficult procedure to use. The easier it is to report, the more useful the system will be and the more information it will collect. On the other hand, a **just culture must ensure that people who report occurrences are not punished for errors, decisions, or omissions that fall within what may reasonably be expected given their training, experience, and working context**. Reporting should not be perceived as “getting oneself into trouble,” but rather as a responsible way of helping to improve. That said, this does not mean that anything goes: gross negligence, intentional violations, or

destructive acts cannot be accepted. The key lies in finding a balance that is clear, fair, and, above all, credible for all those who have an obligation to report. At this point, we must address a **third element that often makes the difference** in achieving the real success of a reporting system: **the attitude of the person reporting**. To understand this, we can draw on the idea of formal ethics developed by Immanuel Kant, one of the great philosophers in history. Explained very simply, when assessing ethical behaviour, Kant distinguished between acting “in accordance with duty” and acting “from duty.” In other words, it is not the same to do something out of fear of the sanction that may result from not doing it, to avoid a problem, or with an ulterior motive, as it is to do it out of goodwill because one genuinely believes that what one is doing is right. Applied to operational safety, reporting an occurrence should not be done out of fear of the consequences of failing to do so, nor to avoid possible responsibilities with an ulterior motive. **An occurrence should be reported out of the conviction that sharing that information and ensuring it reaches the right place helps us learn, prevent, and improve safety**. When people report from that conviction, the reporting system becomes much stronger. Trust is generated, lessons are learned from errors, and a more

mature and genuine safety culture is built, one that involves and embraces everyone in the organisation. Ultimately, a good reporting system does not depend only on forms, technical means, procedures, or regulations; it also depends on people believing in what they are doing and, based on that belief, doing it as well as possible. At SAERCO, **we build a safety culture through occurrence reporting in a coordinated and cross-functional way across the entire organisation**, and we do so precisely from this idea: occurrences must be reported because it is our duty, not out of fear of a sanction, nor as an empty obligation to comply, nor with any ulterior motive, but because it brings value to our sector, because it helps everyone improve the level of safety, because it is part of the way we do things, and above all because **we firmly believe that it is the right thing to do**.

“If an SMS has identified something relevant to safety, reporting it may be useful for the entire industry.”

Proposed amendment to Commission Implementing Regulation (EU) 2015/1018

The European Commission has published a **draft Implementing Regulation that would amend Regulation (EU) 2015/1018**, which contains the list of civil aviation occurrences that must be mandatorily reported under Regulation (EU) 376/2014. For air navigation service providers, the most relevant point is the amendment of Annex III, dedicated to occurrences related to air navigation services and facilities. **The amendment must still be treated as a proposal**, as the draft itself states that it has not been formally adopted or endorsed by the Commission. Nevertheless, it is interesting to examine its content in order to understand what we may expect regarding occurrence reporting.

Are new categories being created in Annex III? Strictly speaking, the draft maintains the structure of the three main blocks of Annex III: occurrences related to aircraft, degradation or loss of services or functions, and other occurrences. In very broad terms, what is genuinely new is that, within those categories, occurrences associated with the following areas are incorporated or updated: UAS, U-space, and information security.

Main developments for an ANSP

UAS now appear expressly in collision or near-collision occurrences, reinforcing the idea that relevant encounters between manned and unmanned traffic should not remain in a grey area of classification. This has a direct impact

on internal reporting tools, taxonomies, analysis procedures, and training for operational personnel, all aimed at enabling a clear **identification of whether the occurrence involves a UAS, whether active U-space existed, whether there was coordination with a USSP/CISP, and whether the event affected separation, ATC clearance, airspace management, or situational awareness**, among other aspects. Additionally, a new reference is included to **incursions by manned aircraft into active U-space within controlled airspace**. The draft adds, as a reportable occurrence, the intrusion of a manned aircraft into an active U-space airspace designated within controlled airspace. As a result, **ANSPs will have to pay particular attention to the activation, publication, coordination, and monitoring of U-space volumes within controlled airspace**. The issue will no longer be only whether a drone enters controlled airspace, but also whether a manned aircraft enters an active U-space volume under conditions that could compromise safety or the planned segregation/management arrangements.

Information security is incorporated as an operational occurrence when it affects systems, as the **draft adds to Annex III the abnormal behaviour of a system due to an information security incident**, with examples such as compromised data, malware, or DDoS

attacks. This connects directly with the Part-IS framework: Implementing Regulation (EU) 2023/203 establishes requirements for occurrence reporting and information security risk management where there may be an impact on operational safety, including organisations covered by Regulation (EU) 2017/373 and U-space. The main conclusion is that a cybersecurity incident will have to be assessed insofar as it may cause abnormal behaviour in necessary operational systems, data, communications, and so on. There is no doubt that the draft reflects the evolution of the ANSP operational environment: drone integration, the deployment of U-space, and the need to coordinate safety, operations, cybersecurity, and security. For ANSPs, updates can be expected to occurrence reporting procedures, staff training, the review of interfaces with USSPs/CISPs, and the adaptation of internal occurrence classification matrices in order to ensure correct classification.

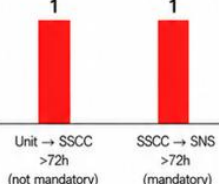
Conclusions

The message conveyed by this draft is clear: mandatory reporting is evolving to better capture emerging risks in an airspace that is increasingly connected, automated, and shared.

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14540-Unmanned-aircraft-systems-reporting-safety-occurrences_en

1 Compliance with Deadlines (72h)

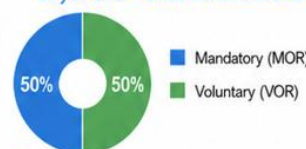
- Full compliance across all units
- Average reporting times below 72 hours
- Only 2 isolated cases regarding deadlines



Compliant with EU Regulation 376/2014 (<72h)

2 Notification Volume

2,288 total notifications



External reports without prior internal notification

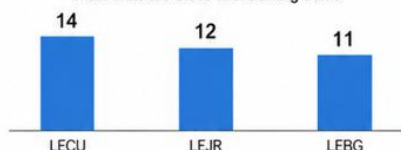
6

- Significant increase compared to the reference period of the previous year
- Reliable reporting system (what happens is reported)
- A consolidated and growing reporting culture based on a user-friendly system and trust in the reporting process

3 Investigations

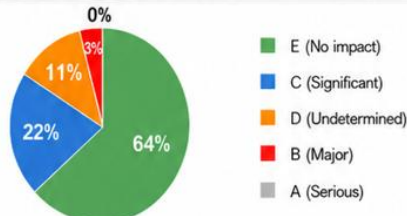
64

Main units are those with training traffic



- 37 out of 64 investigations are concentrated in three units
- The most investigated incident is runway incursion

4 Severity of Investigated Occurrences



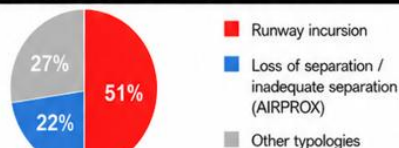
- Occurrences without safety impact predominate
- Proactive investigation system: in 64% of cases the system was triggered by incidents without safety impact

5 ATM Contribution in Investigated Occurrences



Significant improvement compared to the previous reference period (H2 2024): 51% → 34%

6 Typology of Investigated Incidents



Higher occurrence in units with training traffic

At SAERCO, we are very proud of the results achieved in the second half of 2025 regarding safety reporting and analysis in accordance with Regulation (EU) No 376/2014. Most importantly, **these results were made possible thanks to a coordinated and collective effort by everyone across the organisation, especially the personnel of the Operational Units.** Without a doubt, this represents a major success for the organisation's Safety Management System.

7 Trends

- Increase in notification volume while ATM contribution decreases (very positive)
- Reporting times compliant with EU Regulation 376/2014 (<72h)
- Runway incursions remain the most frequent recorded incidents

8 Areas to Monitor

- Runway incursions, especially in units with training traffic
- Particular attention to mixed traffic: commercial IFR + training traffic
- Loss of separation / inadequate separation (AIRPROX) between flight aircraft (training traffic)
- Reduce the number of unreported occurrences identified by third parties
- Coordinate with USMs to clarify all recorded cases

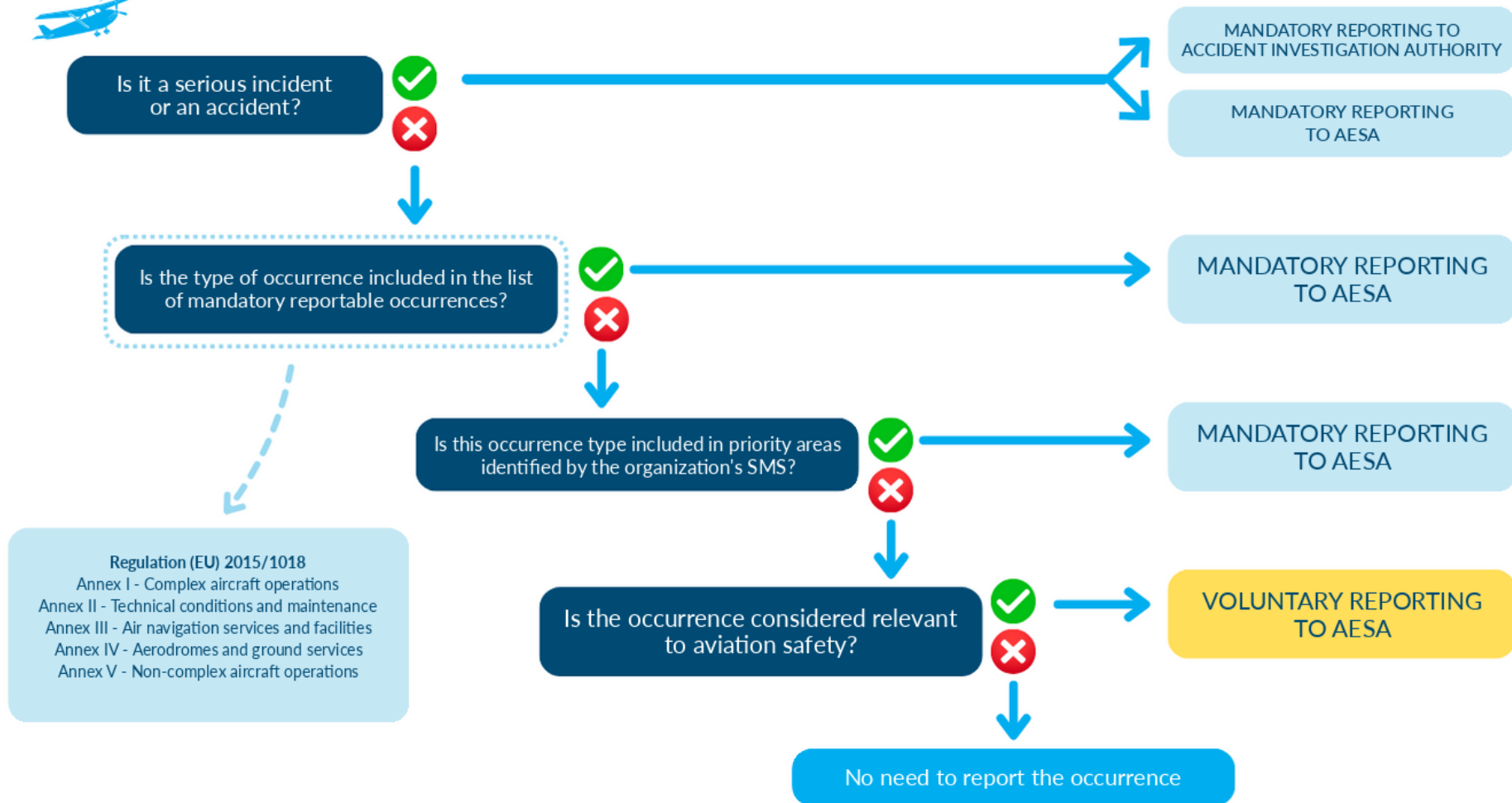
9 Final Assessment

- Mature and effective system based on ease of reporting and Just Culture principles
- Strong and cross-functional safety culture
- High compliance with EU Regulation 376/2014
- Operational safety improvement of 17% compared to the previous reference period
- High internal detection capability and system performance monitoring
- Strong focus and continuous monitoring of runway incursion and loss of separation / inadequate separation (AIRPROX) incidents in relation to Safety Criteria (SAGs)

“Achieving a reporting system in which proactivity is standard practice is not easy; it requires the effort and commitment of the entire organization, especially operational staff”



Do I have to report an occurrence?



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