

Aviation Stakeholder Forum Meeting #3 – October 2024

An aviation stakeholder forum has been established in Ireland to foster and maintain a positive aviation safety culture within the Irish civil aviation system. The Forum is chaired by the IAA and operates in accordance with agreed Terms of Reference. Details of the forum and reports of meetings are published on the IAA website at [Aviation Stakeholder Forum \(iaa.ie\)](https://www.iaa.ie/aviation-stakeholder-forum).

The third meeting of the Forum was held on 1st October 2024 with attendees representing a cross section of organisations involved in civil aviation in Ireland. Minutes of the meeting and associated presentations were distributed to the nominated members of the Forum. The following provides an overview of the meeting.

1 Opening remarks and Agenda

The Chair welcomed Forum members to IAA HQ. A brief overview of the agenda was provided. The agenda included presentations from members regarding updates on key regulatory changes, an update on SAFA/SANA/SACA Programme and Key Risk Areas in the Irish State Plan for Aviation Safety.

The agenda also provided for a breakout session for Forum members to work in groups to confer on key strategic priorities for aviation in Ireland and to present results. In addition, slido polls were conducted to obtain opinions of individual attendees in this respect.

The Chair reiterated the point that forum presentations would be brief leaving plenty of time for interaction and discussion, and comments and questions would be welcomed and encouraged throughout the meeting.

2 Update on key regulatory Changes

Discussions on latest regulatory changes in Europe and Ireland included the following:

- An update on IAA plans in respect of Part IS (information security), NIS 2 Directive and Critical Entities Resilience Directive. Work is ongoing to develop legal and operational mechanisms and related oversight methodology that minimises the burden for regulated entities impacted.
- Proposed amendment to EU Performance Based Navigation Regulation, including harmonisation of specifications for oceanic operations, ACAS and airworthiness requirements.
- Work is ongoing within the EU on the harmonisation of safety standards in respect of ground handling. New EU regulations in this area will be declaration based and will facilitate cross border recognition of Ground Handling organisational approvals within the EU and co-operative oversight. The IAA has taken a lead role on this rulemaking activity in Europe and continues to engage extensively with industry in this respect.
- Highlighted new EU regulations in respect of:
 - Integrated Air Mobility, such as VTOL aircraft and certification of heavy unmanned aircraft
 - EU regulated gyroplanes
- Update on National legislation developments

- Aeronautical Notice P35 was issued concerning a new regulatory regime impacting power paragliders & hang-gliders
- Personnel Licensing Order SI 333/2000 is being updated to reflect latest ICAO Amendments and EU regulatory framework.

Other items noted were:

- The work done by CHCI in obtaining approval of a Fatigue Risk Management System was acknowledged. This was possibly a first in Europe for helicopter operators.
- An update was provided on the IAA survey of Crew Support Programmes that is published on the IAA website.

A Q&A session provided clarity on some of the details in these areas.

A more generic point raised was if the IAA could do more to notify organisations when there are changes planned, or published, in respect of national aviation regulations.

The IAA noted that the consultation process was enhanced in recent years by providing a dedicated consultation landing page on the IAA website [Stakeholder Consultation \(iaa.ie\)](https://www.iaa.ie/stakeholder-consultation) and the IAA has received good responses in recent engagements. The IAA also uses IAA Twitter account to highlight when significant changes are underway.

To improve the outreach, the IAA is also reviewing latest options for providing an automatic notification system on the IAA website, using a modern version of the RSS feed function.

3. Update on SAFA/SANA/SACA Programme

An overview of the RAMP inspection regime was provided by the IAA specialist in this area addressing the differences between regulations for SAFA, SANA and SACA. The overview also addressed the recent addition of alcohol testing in the scope of EU regulations and described how this is carried out using prescribed limits and test equipment. The different categories of findings issued under these programmes were described, along with potential consequences of findings, which can lead to prosecution of individuals and grounding of aircraft in more serious cases.

The Q&A session that followed clarified a number of points including:

- Co-ordination between EASA and States to share information on any immediate operational concerns and higher risk operators.
- Alcohol limits are set at low level, equivalent to professional bus/taxi driver or learner drivers in Ireland.
- The interfaces between ramp inspectors and security forces in respect of alcohol testing
- Confirmation that the rules on alcohol testing also apply to non-EASA regulated activities, such as microlights, home builds etc, i.e. the so-called Annex I activities.
- Work is underway under the NextGen project to improve the RAMP inspection processes.
- Work is underway to extend the testing regime to include psychoactive drugs.

4. Breakout session

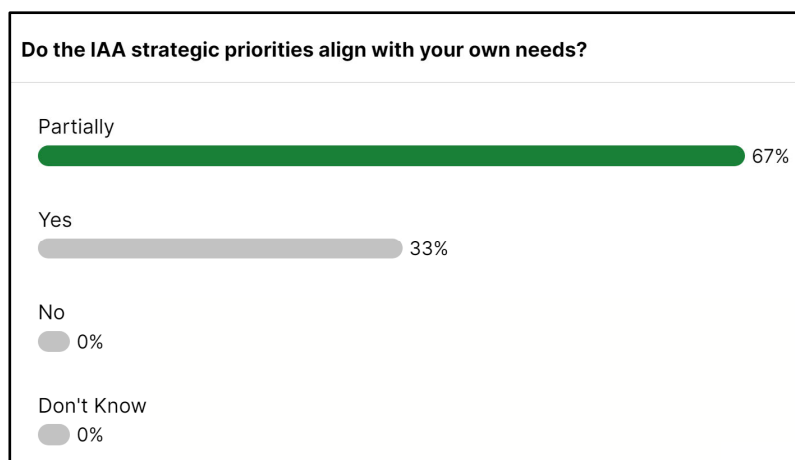
A breakout session was organised to allow members to work in groups to confer on key strategic priorities for aviation in Ireland and to present results to the forum.

The following were the highlights presented by group spokespersons

- Just Culture: More work is required to improve just culture at the level of the regulator and the organisation.
- Level playing field: Consideration of commercial pressures on private organisations versus government owned semi-state organisations
- Fuel Tankering in commercial airline activities. How is this being regulated and what sanctions will apply.
- Risk and performance-based auditing has not progressed quickly enough. Still very much a compliance checklist-oriented activity.
- Communication: More needs to be done to keep everyone informed in respect of regulatory changes in particular.
- New Fees Order has shown significant increases in some areas of personnel licencing.
- Some confusion still exists over the role of the IAA and of AirNav Ireland following the organisational split last year.
- Aeronautical Charting issues – some errors highlighted to IAA Charting contacts have not yet been corrected in charts.
- Resources: ongoing difficulties in recruiting staff into aviation impacting regulator and regulated organisations. Issues emerging include competition from other industries, accommodation costs, minimum wage regulations.
- Regulation (change management): Onerous tasks in some cases e.g. in ANS/ATM domain.
- Licensing (backlog): backlog issue still evident in Engineering licences post-Brexit.
- Fatigue/ Stress: How we manage it. Links also to difficulty in resourcing.
- Part IS (workshop): Industry workshop(s) needed to address how this will be implemented in Ireland.
- Aviation funding: Can more funding mechanisms be provided in Ireland to support aviation initiatives.
- Aerodromes: More dedicated aerodromes workshops should be organised by the IAA.

Some of these points were addressed during related discussions. The Chair advised that the issues raised during these group exercises will be taken under review by the IAA in the context of the Statement of Strategy published at [Strategy and Values \(iaa.ie\)](https://www.iaa.ie/strategy-and-values).

With this in mind, and in order to elicit further engagement with attendees, the IAA launched two straw polls using slido with results as shown below.





The areas noted as not being well addressed in the IAA strategy also reflect some of the points raised during the group sessions.

In conclusion, the Chair noted that some of the items raised during this session may already be part of ongoing work by the IAA in conjunction with regulated entities, and that the issues emerging today will be brought to the table to ensure that they are addressed as part of that work. Other issues will form valuable inputs to the development of the next version of the IAA Statement of Strategy that will begin in early 2025.

5. Update on Key Risk Areas in the State Plan for Aviation Safety

This standing agenda item addresses some of the key risk areas in the State Plan for Aviation Safety, as published on the IAA website www.iaa.ie/Safety.

At this forum the focus was on runway incursions and GNSS Spoofing and Jamming. An update was also provided on latest discussions at recent EASA Safe 360 conference in this regard. It was noted that the next meeting of the Irish National Runway Safety Forum is planned for 12th November 2024.

The meeting also focused on the topic of Standard Phraseology, which is designed to avoid confusion between ATCO and Pilot that can often be a causal factor in aircraft accidents and serious incidents. Incidents arising from failure to use standard phraseology are monitored by AirNav Ireland, including incidents that have ATM contribution. The impact of human factors and human performance in this respect was also discussed.

Subsequent discussions between forum members addressed the following:

- The need for co-ordination between regulators, air operators, ATS/ATM providers and airports to fully address cross-domain safety issues such as runway safety.
- The availability of aircraft technical solutions to help prevent runway excursion.
- The number of reports of GNSS jamming and spoofing continue to increase, and the need to remain vigilant in managing the associated risks. EU guidance in this respect is found in EASA SIB 2022-02 Rev 3, as updated in July 2024.
- The importance of a positive safety culture and just culture in helping to manage safety.

6. Any other business

Costs for ICAO Documents:

ICAO charges for ICAO documentation that provide valuable safety information for organisations and each individual organisation must bear the costs of purchasing these documents. Can, or should, the ICAO publications be provided free of charge to regulated entities within a State through the Competent Authorities of other?

It was noted that ICAO charges for publications as part of the agreed funding model for ICAO itself. The IAA procures ICAO publications through a commercial contract that limits its ability to freely distribute or otherwise provide access to these documents outside of the IAA.

7. Closing Remarks

The Chair summarised the proceedings and thanked the presenters for their interesting and informative presentations and thanked members for their participation and engagement in the discussions and break-out sessions. Members were invited to provide feedback on how the meeting was conducted, the presentations provided and effectiveness of the breakout sessions and slido polls etc.

Members were reminded members that they were welcome to propose agenda items for next meeting at any time and to present on topics they feel might be relevant to the Forum.

8 Next Meeting

The next meeting of ASF will be planned in March 2025.