

Aviation Stakeholder Forum Report #1 – Sep 2023

In accordance with Article 76 of SI #40 of 2022, Air Navigation and Transport Act 2022 (hereinafter referred to as ANTA 2022), concerning the establishment of an aviation stakeholder forum the IAA is required to:

- specify the organisations invited to participate in the Stakeholder Forum, to include recognised aviation stakeholder groups, recognised aviation trade unions and representative bodies, certified aviation organisations and other interested parties, and
- determine the rules and procedures of the Forum including the composition of membership to ensure a representative participation from each organisation and the publication of minutes of meetings of the Forum

Following open consultation on Terms of Reference for the Forum during Q1 2023, the IAA formally launched the forum in June 2023 through the issuance of General Advisory Memorandum GAM 03.

166 invitations were issued of which 74 invitees nominated representatives to participate in the Forum. Invitees who have not yet nominated representatives to the Forum may still do so by responding to the invitation.

The inaugural meeting of the Forum was held on 20th Sep 2023 with 50 in attendance representing a cross section of organisations as specified in ANTA 2022. Minutes of the meeting and associated presentations were distributed to the nominated members of the Forum.

The following provides an overview of the meeting.

1.0 Overview and opening remarks

A brief overview of the agenda was provided. For the inaugural meeting the presentations were made by the IAA to brief the forum on what they do and what they would like to achieve. The intention was that presentations would be brief leaving plenty of time for interaction/discussion. Comments were welcomed and encouraged throughout the meeting.

The IAA presented a brief overview of the role of the IAA and its recent re-organisational change following the Air Navigation Transport Act 2022 and a high-level overview of the IAA Statement of Strategy that was recently subject to public consultation on the IAA website.

The IAA goal for the Forum is to foster and maintain a positive aviation culture within the Irish aviation system the IAA emphasised the fact that the IAA wants to hear from our stakeholders on what needs to be addressed in safety management, what are the key risks to be included and how can we improve safety in Ireland?

2.0 Terms of Reference

The Terms of Reference were subject to open consultation during Q1 2023. A line-by-line review was conducted and the ToR's were formally adopted as published in GAM.03 on the IAA website. Formally the Forum membership is as provided by the organisations present. It was clarified that

formal membership is limited to one representative per organisation for logistical reasons, however alternatives may be proposed and for the purposes of the successful working of the Forum there will be an opportunity to bring in experts to support specific agenda items or working group activities.

3.0 IAA Safety Management and Safety Oversight

The IAA provided an overview of the State Safety Programme which describes how safety is managed at state level, how interfaces between State agencies and aviation Stakeholders work, the regulatory framework for safety management, and safety management processes at State level, including the IAA enforcement policy.

The following key State level safety documents are published on the IAA website

<https://www.iaa.ie/safety>

- State Safety Programme (SSP)
- State Plan for Aviation Safety (SPAS)
- Annual Safety Performance Review (ASPR)

Forum members were encouraged to provide feedback to IAA on these documents and it was emphasised that the Forum can support the State Level safety management processes by helping to identify aviation safety hazards and proposing actions needed to mitigate risks.

The IAA highlighted the importance of a positive safety culture and reporting culture supported by just culture and the combined responsibility of both the IAA and regulated organisations to foster a positive safety culture. It was also noted that the sharing safety information between all stakeholders is extremely important, and this is one of the key objectives of the Forum.

The IAA also provided an overview of the IAA Oversight programme that is currently in transition from a compliance-based oversight approach to a risk-based oversight approach as outlined in the State Plan for Aviation Safety. The oversight programme covers a large scope of activities in Flight Operations, Training Organisations, Airworthiness, Personnel Licensing and Aviation Infrastructure and Aviation Security.

The risk-based oversight approach, which is to the largest extent possible data-driven, takes into account the specific nature of an organisation, the complexity of its activities, the results of past certification activities and an assessment of associated risks.

The IAA uses organisational risk profiling to develop the annual oversight plan and adapts the oversight plan based on ongoing monitoring of risk and performance. The roll-out of IAA digitalisation projects will help to improve user interfaces with the IAA and the capability of the IAA to monitor performance.

These topics generated great interest and discussion in the Forum. Key issues highlighted during the open floor discussions included:

- Implementing a safety culture and the how to assess reporting culture, eg benchmarking.
- Awareness of the just culture provisions that are implemented in Ireland
- Addressing failures by foreign States to properly implement just culture provisions

- Overly complex occurrence reporting systems (eg for small organisations, general aviation and Drone operators)
- Greater visibility of the IAA digitalisation (eg MySRS) implementation and update plans

4.0 Licence Holder charter

The IAA provided a brief overview of personnel licensing activities addressing aeromedical, flight crew, air navigation services and aircraft maintenance engineers. It was noted that since 2012, there has been huge growth in the aircrew licensing area with great expansion due to impact of BREXIT. Currently there are almost 20,000 active flight crew licences (approx.150,000 in the EU system). Similarly, there has been a large increase in engineer licenses following the BREXIT announcement with approximately 3,000 licences currently issued. 62 nationalities are holding Irish licences (mainly Part 66 and FCL).

The Licence Holder Charter was launched for public consultation on the IAA website on 20th September 2023 and Forum Members were urged to highlight within their organisation for review and comment. Consultations via written responses were accepted via email until October 31st, 2023 (Consultation@IAA.ie)

There followed some discussions on the difficulties experienced by some stakeholders arising from BREXIT and COVID-19 issues and how availability of resources at both IAA and organisations were a continuous challenge. It was also noted that the IAA digitalisation of the licensing process will greatly help the situation.

5.0 Update on Key regulatory Changes

The IAA gave a brief introduction to latest European regulatory developments which typically take up to 4 years for regulation to be published with a further 2 years for it come into force. There are opportunities during that time to engage with this process as part of EU consultation processes (eg NPA). There is a webpage on the EASA website that allows individuals to review material being worked on and comment of this. The IAA comments on these papers, but it is open to all stakeholders. EASA reviews and responds to these comments.

The IAA highlighted forthcoming EU regulations concerning cybersecurity, the so called Part IS requirements. The IAA hosted an EASA workshop in September which was attended by many of the organisations represented in the Forum. The IAA is also working on tasks to synergise the oversight of the Part-IS EU requirements with National requirements outside of the aviation safety regulations (NIS Directive) in order to minimise the oversight burden on organisations.

The IAA is planning further workshops on Cybersecurity regulations that Forum Members are encouraged to attend. The Forum was asked to consider is a dedicated Working Group should be established to review this topic. This may also be a subject that is worth more detailed review as part of next Forum Meeting Agenda.

As well as continued development of the EU Regulatory framework to address Drones and U-Space, there are other imminent regulatory changes being proposed at EU level to address Flight crew licensing, aerodromes rules, rules of the air (SERA) and aeronautical radio altimeter standards (5G interference).

National legislation has been introduced recently to address upper airspace operations (eg Virgin orbit launch) and coastguard operations. In addition, the Air Navigation Transport Act includes provisions that allow the Minister for Transport to introduce fixed charged penalties to support enforcement actions, that will be introduced in the next few years through relevant statutory instruments.

Open floor discussions highlighted the difficulty for smaller organisations (eg Drone operators) to keep up to date with regulatory changes. It was also suggested that the IAA could do more to highlight when it has taken enforcement action (eg against Drone Infringements) to help encourage greater awareness of the regulations in force.

6.0 Closing Remarks

CX IAA formally closed the meeting with the following summary:

- For the purposes of the inaugural meeting the IAA has laid out our broad strategy and outlined our processes.
- The IAA is looking to the Forum to provide greater opportunity to collaborate more with organisations and persons and encourage enhanced communication between all stakeholders.
- The Forum has some identified areas that may be suitable topics for detailed review at future Forum meetings, such as lack of resources, cybersecurity regulations (eg Part IS) and occurrence reporting/just culture.

It was emphasised that the forum will be as useful as we collectively make it and the IAA encouraged all members to bring topics forward for discussion at future meetings.

7.0 Next Meeting

The next meeting of ASF will be planned for March/April 2024. Advance notice will be sent to Forum Members early in 2024 looking for inputs/proposals for the agenda.