



European Aviation Safety Agency

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Cologne, 12 November 2008
EASA S1 FBA/PGE D (2008) 84379

Mr Eamonn Brennan
Chief Executive
Irish Aviation Authority
Aviation House
Hawkins Street, Dublin 2
IRELAND

Subject: Standardisation Inspection¹ of IRELAND (09.2008)

Scope: Regulation (EC) 216/2008², Regulation (EC) 1702/2003³ (Subpart H - Airworthiness Certificates, Subpart I - Noise Certificates and Subpart-P - Permit to Fly), Regulation (EC) 2042/2003⁴ (all Parts)

Attachment: Final Report on the Standardisation Inspection of Ireland

Dear Mr Brennan,

With reference to Art. 24 of Regulation (EC) No 216/2008, your country was inspected by the Agency in September 2008. The purpose of this standardisation inspection was to monitor the application by the Irish Aviation Authority of Regulation (EC) No 216/2008 and its implementing rules as outlined above, and to report the results to the European Commission.

The open and constructive discussions with the Irish Aviation Authority through the visit were much appreciated. On behalf of the inspection team, I would like to thank all those concerned by the visit, in particular Mr David Shaw, who played a key role in its success. Please also convey our thanks to the visited undertakings for having received the team in their facilities.

¹ COMMISSION REGULATION (EC) No 736/2006 of 16 May 2006 on working methods of the European Aviation Safety Agency for conducting standardisation inspections

² REGULATION (EC) No 216/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC

³ COMMISSION REGULATION (EC) No 1702/2003 of 24 September 2003 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations

⁴ COMMISSION REGULATION (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

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This inspection has highlighted a number of strengths, among which should be quoted the competence and the positive attitude of the Irish Aviation Authority staff. However, this inspection has also revealed some areas for improvement.

You will find attached the final report arising from the inspection, established on the basis of the preliminary report that was presented to the Irish Aviation Authority, debriefed on 26 September on the Irish Aviation Authority's premises in Dublin. The findings raised in the preliminary report together with the comments from the Irish Aviation Authority were reviewed by EASA and classified in accordance with Art. 13 of Regulation 736/2006¹

Findings classified (c) and (d) require your further attention. Part 5 of the attached report requests that according to the inspection findings presented in the appendix, the relevant deadline in the follow-up phase of this standardisation inspection is either:

- **2 weeks** from the date of receipt of this report, for class (d) findings, or
- **10 weeks** from the date of receipt of this report, for class (c) findings.

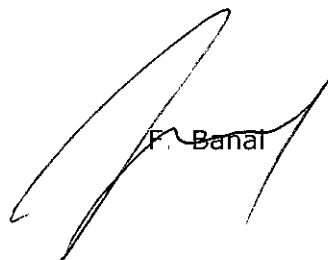
Furthermore, all submitted remedial action plans shall be agreed with EASA within a maximum of **16 weeks** from the date of receipt of this report.

The Agency has the obligation to verify that remedial actions have been implemented within the timelines to be agreed, and to validate the remedial action before the closure of each finding. Therefore, in your remedial action plans we request you to indicate, for each finding, the date by which you plan to have implemented the permanent remedial action. Upon implementation, please notify EASA and attach supporting documents for evidence.

Please note that in application of Art. 10 of the Standardisation Inspection Regulation¹ this letter and the attachment report are also sent to your State Permanent Representation to the European Union and to the European Commission, to whom the Agency shall also report on the follow-up actions and on the closure of the findings.

Thank you in advance for your prompt answer to this letter.

Yours sincerely,



F. Banal

Copy:

1. Irish Aviation Authority (Mr Shaw)
2. European Commission, DG-TREN F (Mr Calleja Crespo)
3. European Commission, DG-TREN F3 (Mr Salvarani)
4. Irish Representation to the European Union



Final Report
on the EASA Standardisation Inspection of

Ireland
Irish Aviation Authority

In the field of European aviation safety regulations applicable to
continuing airworthiness

22 to 26 September 2008

Report ID: CAW.IE.9.2008

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This Standardisation Inspection Final
Report was distributed to:

1. European Commission, DG-TREN.F
2. Irish Aviation Authority
3. State Permanent Representation of
Ireland to the European Union
4. EASA S.1

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Foreword

Articles 24.1 and 54 of the Basic Regulation¹ require the European Aviation Safety Agency (EASA) to conduct Standardisation Inspections, in order to monitor the application by National Aviation Authorities (NAA) of this Regulation and of its implementing rules, and to report to the Commission.

For the purpose of assessing compliance with the Basic Regulation and its implementing rules

Article 3.1 of the Standardisation Inspection Regulation² states that the Agency shall carry out inspections of National Aviation Authorities whereby it shall examine in particular compliance of the CAA-NL with the annexes of Regulation (EC) 2042/2003.

Article 3.2 of the Standardisation Inspection Regulation rules that the Agency may also conduct investigations of undertakings under the oversight of the inspected NAA.

On this account, the Agency has mandated its Approvals and Standardisation Directorate with the conduct of Standardisation Inspections in Member States and, if necessary, at undertakings.

Findings against National Aviation Authorities of the inspected Member State are classified in line with Article 13 of the Standardisation Inspection Regulation and are presented in the appendices to this report (see Part 5).

Observations made at undertakings have already been communicated to the NAA by means of the Preliminary Inspection Report. The NAA is reminded that it is responsible for taking appropriate action for remedy.

¹ REGULATION (EC) No 216/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC

² COMMISSION REGULATION (EC) No 736/2006 of 16 May 2006 on working methods of the European Aviation Safety Agency for conducting standardisation inspections

⁵ Article 9.1 (d) of Commission Regulation (EC) No 736/2006.



Part 1 – Executive Summary

Outline

This EASA Standardisation Inspection of Ireland mainly covered continuing airworthiness. It was carried out in September 2008 with a team composed of three inspectors for one week.

During the course of the inspection, three organisations (together holding four approvals) were visited to sample the IAA's oversight of approved organisations in the area inspected.

In addition, the inspection team took the opportunity of this visit to review the status of the two (2) remaining open findings from the previous Standardisation visit performed in September 2006. After the review of evidence, both findings could be closed.

1 - Primary Aviation Legislation

As Ireland is a member of the European Union, EC regulations are fully applicable.

2 – Specific Operating Regulations

As Ireland is a member of the European Union, EC regulations are fully applicable.

3 – State civil aviation system and safety oversight functions

The IAA has been designated as the competent authority for Regulation (EC) No. 216/2008 and all related rules and regulations through Irish Minister for Transport Statutory Instrument S.I. No. 95 of 2008, amending Irish Minister for Transport Statutory Instrument S.I. No. 469 of 2003 for Regulation (EC) No. 1592/2002.

The IAA has recently started the process of restructuring, but no changes had been made at the time of the Standardisation Inspection.

The Airworthiness Standards Department of the Safety Regulation Division has the responsibility for Continuing Airworthiness. The department staffing of 33 persons under the Director consists of an Assisting Director, 8 Aeronautical Officers and Airworthiness Officers, 19 Aeronautical Inspectors and 5 administrative staff members.

4 – Technical personnel qualification and training

The IAA has established clear qualification requirements for the recruitment of Officers and Inspectors. In addition, there are procedures describing the requirements for initial training as well as for recurrent training.

5 – Technical guidance, tools and the provision of safety critical information

The organisation and work of the IAA is described and governed by a system of manuals and procedures of which the high level document is the "Business System Manual". (The manual is also an element of the IAA ISO 9001-2000 certification.). As complement to the procedures, there is an extensive use of check lists. The system for internal information appeared to work as intended. External safety critical information is published on the IAA internet website, and information letters to approved organisations is also a method used.



6 – Licensing, certification, authorisation and approval obligations

In general, the IAA implements its procedures and the regulations in a satisfactory manner for the issue of approvals and licences. The authority has the means and the resolve to ensure full implementation of the requirements. However, one Part-147 approval had been issued to an organisation although the training syllabi, specified in the organisation's "Phase Books", were not in compliance with Part-66 as they were still based on, and referring to, JAA requirements.

7 – Surveillance obligations

The surveillance activities of the IAA were considered to be effective. However, for one Part-147 approved organisation (mentioned under item 6, above) the surveillance activities had still allowed for the organisation to have their syllabi referring to JAR-66.

8 – Resolution of safety concerns

The enforcement of the regulations by the IAA was considered to be effective.

Conclusions

During this Standardisation Inspection, a total of 13 non-compliance findings was raised against the IAA. One (1) relates to Part-145, three (3) to Part-M, one (1) to Part-147, three (3) to Part-66, one (1) to Basic Regulation 216/2008 and four (4) are general (relating to more than one Part). There were no indications of an immediate safety hazard.

Some findings are based on observations made at undertakings. The IAA was notified of these observations on the 26 September 2008 by means of the Preliminary Report.

The most significant deficiencies, as notified to the IAA during the closing meeting, are:

Procedures are in place, but some of do not fully cover all aspects of the applicable requirements.

The national survey programme for aircraft (ACAM) has not been fully implemented.

A visited Part-147 training organisation has their training syllabi based on the obsolete JAR-66 requirements.

The team would like to thank the National Coordinator for his availability and support during this Standardisation Inspection which enabled the programme to be completed as planned.

The IAA showed a very cooperative attitude throughout this standardisation inspection and appeared to fully support the standardisation process. The team is thankful to the IAA for its openness, its full transparency and its positive attitude at all phases throughout the visit. This contributed to the efficiency and effectiveness of the team and resulted in the conclusions being widely shared and generally promptly addressed.



Part 2 – Conduct of the Inspection

2.1 Background

A Standardisation Inspection was performed at the Irish Aviation Authority (hereinafter called IAA) in Ireland. The visit took place from 22 September 2008 to 26 September 2008.

The purpose of this Standardisation Inspection was to monitor the application by the national aviation authority of the common rules in the field of aviation safety and to report the results to the European Commission.

The inspection was conducted in application of Article 24 and pursuant to Article 54 of Regulation (EC) No 216/2008 and in accordance with the provisions of Commission Regulation (EC) No 736/2006 on working methods of the European Aviation Safety Agency for conducting standardisation inspections, using approved procedures and relevant guidance material of the European Aviation Safety Agency, as amended.

2.2 Scope

The scope of this standardisation inspection covered:

Regulation (EC) No 216/2008 including the following Implementing Rules:

Commission Regulation (EC) No 1702/2003, amended by

(EC) No 381/2005

(EC) No 706/2006

(EC) No 335/2007

(EC) No 375/2007

(EC) No 287/2008

Part 21 Section B, Subpart A – General Provisions

Part 21 Subpart H - Certificate of Airworthiness

Part 21 Subpart I - Noise Certificates

Part 21 Subpart P - Permit to Fly

Commission Regulation (EC) No 2042/2003, amended by

(EC) No 707/2006

(EC) No 376/2007

Annex I Part-M - Continuing airworthiness requirements

Annex II Part-145 - Maintenance organisation approvals

Annex III Part-66 - Certifying staff

Annex IV Part-147 - Training organisation requirements



2.3 National Coordinator

Pursuant to Article 6.4 of Commission Regulation (EC) No 736/2006, Member States shall appoint a National Coordinator to assist EASA at all stages of the Standardisation Inspection process. The individual nominated by the IAA was Mr David Shaw.

2.4 Inspection Team

The EASA inspection team was composed as follows:

Team Leader: Mr Peder Gernandt, EASA
Team Member: Ms Cecilia Cardoso, seconded by INAC - Portugal
Team Member: Mr Franz Graser, seconded by Austrocontrol – Austria

In addition, the following person participated in the inspection but was not an active team member:

Observer: Mr Pawan Kumar, Indian DGCA - Seconded to COSCAP

2.5 Officials Met

During the course of the on-site phase of the Standardisation Inspection, meetings took place with following officials of the IAA:

Brian Skehan, Assistant Director Airworthiness Department
Sinead Quirke, Assistant Director Regulatory Performance & Personnel Licensing Dept.
Denis O'Shea, Chief Airworthiness Inspector
Jim Corbett, Aeronautical Officer
Nicholas Butterfield, Aeronautical Officer
Declan Fitzpatrick, Aeronautical Officer
Gerard Lawlor, AME Licensing Officer
Dave Shaw, National Coordinator

2.6 Inspection Programme

The inspection programme was proposed by EASA and agreed with the IAA. The visiting phase began with a preliminary meeting on 22 September 2008 and concluded with a wrap-up meeting on 26 September 2008 at the IAA head office in Dublin.

The inspection was conducted in Dublin, headquarters of the IAA, the competent authority designated by Ireland according to Statutory Instruments S.I. No. 469 of 2003 and S.I. No.95 of 2008.

The programme also included several visits to undertakings under the surveillance of the IAA, comprising:

Air operators:

Irish Helicopter Ltd., Dublin, IE.MG.006

CityJet Ltd., Dublin, IE.MG.016

Maintenance organisations:

CityJet Ltd., Dublin, IE.145.028

Maintenance training organisations:

Dublin Institute of Technology, Dublin, IE.147.003

At the closing session held in Dublin on 26 September 2008, pursuant to Article 9 (d) of Regulation (EC) 736/2006, the appointed National Coordinator was provided with a



Preliminary Inspection Report, which included a list of requirements reviewed, a list of findings and observations made at undertakings together with IAA's comments, if any.

The following officials of the inspected IAA attended the closing session:

Kevin Humphreys, Director Safety Regulation
Brian Skehan, Assistant Director Airworthiness Department
Sinead Quirke, Assistant Director Regulatory Performance & Personnel Licensing Dept.
Denis O'Shea, Chief Airworthiness Inspector
Flan Garry, Aeronautical Officer
Jim Corbett, Aeronautical Officer
Nicholas Butterfield, Aeronautical Officer
Declan Fitzpatrick, Aeronautical Officer
Gerard Lawlor, AME Licensing Officer
Dave Shaw, National Coordinator

2.7 Additional Information

None

Part 3 – Immediate Safety Hazards (ISH)⁵

No immediate safety hazard was detected during the inspection.

Part 4 – Comments of the National Aviation Authority⁶

Some comments specific to findings can be found together with the related finding in the corresponding appendix.

⁶ Article 10 of Commission Regulation (EC) No 736/2006



Part 5 – Finding Classes and Initial Follow-up

The findings were reviewed and classified by EASA in accordance with the definition below from Article 13 of Commission Regulation (EC) 736/2006.

Class (a) fully compliant;

Class (b) are compliance findings, but improvement is recommended in areas (reference to the rules affected) for better efficiency;

Class (c) are non compliance findings, with objective evidence of minor deficiencies showing non-compliance with the applicable requirements in areas which could raise standardisation concerns that the NAA has to address in order to demonstrate compliance with European regulations;

Action: The NAA is requested to send to EASA, within 10 weeks from the date of receipt of this report, the action plan that is deemed necessary for each item, together with the date planned for completion.

Class (d) are non compliance findings, with objective evidence of significant deficiencies showing non-compliance with the applicable requirements in areas, which, besides standardisation concerns, raise safety concerns if not promptly corrected;

These findings require the urgent attention of the NAA.

Action: The NAA must report to EASA, within 14 days from the date of receipt of this report, the action(s) that the NAA has decided is needed for each item, the current status of implementation and the date the NAA proposes for completion.

Class (e) not applicable;

Class (f) are findings not confirmed, material evidence not being directly available at the time of the visit.

ACTION

According to the inspection findings presented in the appendices, the first relevant deadline in the follow-up phase of this standardisation inspection is **14 days**, with a further deadline at **10 weeks** from the date of receipt of this report.

All submitted remedial action plans shall be agreed with EASA within a maximum of **16 weeks** upon receipt of this report.

In all cases, the NAA is requested to report to EASA in due time. It should be noted that EASA is required to raise a supplementary report to the NAA, the Member State and the European Commission in the event that no satisfactory remedial action is proposed or implemented by the NAA⁷ in the appropriate timescales.

Observations made by the Agency at undertakings, if any, shall be processed by the NAA as findings in accordance with Section B of the applicable Part. Before issuance of a Standardisation Statement of Findings Closure, the Agency expects to receive a formal statement that the competent authority has properly handled the observation(s) notified by the Agency in accordance with the relevant provisions of Section B.

⁷ Article 15(3) of Commission Regulation (EC) No 736/2006.



The attached Standardisation Inspection of Ireland, Final Report number CAW.IE.9.2008 Appendix 1 contains all findings from the Preliminary Inspection Report of this inspection and the classification made in accordance with Art. 13 of Commission Regulation (EC) No 736/2006.

Appendix 1 consists of a total of 4 pages and 13 findings as follows:

Finding class	Number of findings
(a)	-
(b)	-
(c)	12
(d)	1
(e)	-
(f)	-



Standardisation Inspection of Ireland

Final Report n° CAW.IE.9.2008 Appendix 1

Class (d) findings according to Regulation (EC) n° 736/2006 Art. 13

Regulation (EC) n° 2042/2003 Annex IV (PART-147)

Reference IE # 8170 [Open](#)

Basis 147 B 110

Finding dated 26/09/2008

Based on the number of, and character of, observations related to the MTOE, the training books and the training syllabi of the visited Part-147 undertaking (IE.147.003), it was concluded, that the initial approval and subsequent control of these documents and procedures were not sufficient to ensure full compliance with the applicable Part-147 requirements

Comment none

Class (c) findings according to Regulation (EC) n° 736/2006 Art. 13

General issues or issues related to several Parts

Reference IE # 8169 [Open](#)

Basis 145.B.55, 145 B.25, M.B 103 and M.B 703

Finding dated 26/09/2008

There is no procedure in place for the entry of the date of the approval certificate
On one sampled organisation (IE MG 016, IE.145.028) an inconsistency was identified in the use of dates of issue on the approval certificates

Comment none

Reference IE # 8165 [Open](#)

Basis 145 B.55, M B 104, 147 B 20 and 66 B.20

Finding dated 26/09/2008

The reviewed procedures do not specify the retention period for records as required per referenced regulations.

Comment none

Reference IE # 8161 [Open](#)

Basis 216/2008 Article 14(4)

Finding dated 26/09/2008

For a sampled exemption (No 512), in accordance with Article 14(4) of Regulation (EC) No 216/2008, which was granted for a period of more than two months, evidence that the Agency and the Commission have been notified could not be shown

Comment none

Reference IE # 8160 [Open](#)

Basis M.B.102(c), 145.B.10 3, 147.B 10(c) and 66 B.10(c)

Finding dated 26/09/2008

The procedure for initial training of inspection staff indicates that an assessment will be carried out by the HAWSD. The method by which the assessment and authorisation will be carried out is not described in sufficient detail.

Added for clarity: HAWSD=Head of Airworthiness Standards Department

Comment none

Reference IE # 8159 [Open](#)

Basis M.B.102(d), 145.B.10 4, 66.B.10(c), 147.B.10(c) and 21.B 25(c)
21.B.30(a)(b)

Finding dated 26/09/2008
☐☐No documented procedures for staff continuation training to perform their allocated tasks in the areas of Part-M, -145, -66 -147 and Part 21 H, I, P activities.
☐☐The IAA has a continuation training plan established for Part-M, -145, -66 and -147 activities. The plan does not cover Part 21 Subparts H, I and P activities.

Comment Training did take place in March 2007 for the introduction of Part 21 Subpart P for both industry and staff but is only documented by emails.

FCC comment: The comment from the IAA does not change the intent of the finding.

Regulation (EC) n° 2042/2003 Annex I (PART-M)

Reference IE # 8168 [Open](#)

Basis M.B.301

Finding dated 26/09/2008
As a sampled maintenance program for Bell 407 (IE.MG.006) referred to the current revision of the manufacturers manuals, the program was automatically amended with every revision of those without assessment and formal approval by the IAA. This is an indirect approval of the maintenance program by the operator without specific approval from the IAA.

Comment This comment is a result of provisional finding number 9 and further comment by the IAA, maybe made either prior to, or after the Findings Classification Committee meeting and the issue of the preliminary Final Report.

FCC comment: The FCC confirmed both finding 8167 and 8168 are non-compliant findings.

Reference IE # 8167 [Open](#)

Basis M.B.301 and M.A.302

Finding dated 26/09/2008
A sampled maintenance program (for Bell 407 of IE.MG.006) did not contain the maintenance schedule with description of tasks and frequencies as required by Part-M. Instead, the program referred to the latest revisions of airframe and engine manufacturers manuals.

Comment none

Reference IE # 8166 [Open](#)

Basis M.B.303

Finding dated 26/09/2008
The aircraft continuing airworthiness monitoring programme (ACAM) has not been fully implemented.

Comment none

Regulation (EC) n° 2042/2003 Annex II (PART-145)

Reference IE # 8171 [Open](#)

Basis 145 B.50

Finding dated 26/09/2008

Some of the findings from an audit of a Part-145 organisation (IE.145.010) in 2007 were closed based on statements that the corrective actions will be carried out.

Comment none

Regulation (EC) n° 2042/2003 Annex III (PART-66)

Reference IE # 8164 [Open](#)

Basis 66.B 10(c) and 66 B 20

Finding dated 26/09/2008

The Part-66 procedure No 4 for record keeping of issued/amended licenses does not cover all elements as required per 66.B 20.

FCC comment: Reference 66 B.10(c) added

Comment none

Reference IE # 8162 [Open](#)

Basis 66 B.10(c) and 66 B.200(b)

Finding dated 26/09/2008

Part-66 procedure No's 7 and 8 states that examiners for basic examinations and for type examinations shall be appointed, but it does not give details how it shall be done. However a list of appointed examiners was available

Comment none

Reference IE # 8163 [Open](#)

Basis 66 B.10(c), 66 B.200(e), (g), (h) and (i)

Finding dated 26/09/2008

Procedure No's 7 and 8 describing examinations conducted by the competent authority do not cover all elements as required per 66 B.200.

FCC comment: Reference 66.B 10(c) added

Comment none