



## European Aviation Safety Agency

Francesco Banal • Approvals & Standardisation Director

---

Cologne, 16 December 2010  
EASA S1 FBA/CCH D (2010) 55653

**Irish Aviation Authority**

Mr Eamonn Brennan  
Chief Executive  
The Times Building  
11-12 D'Olier Street  
Dublin 2  
**IRELAND**

**Subject: Standardisation Inspection<sup>1</sup> of Ireland (COM.IE.10.2010)**

**Scope: Regulation (EC) 216/2008<sup>2</sup>, Regulation (EC) 1702/2003<sup>3</sup> as amended and Regulation (EC) 2042/2003<sup>4</sup> as amended.**

Attachment: Final Report on the Initial Airworthiness

Dear Mr Brennan,

With reference to Art. 24 of Regulation (EC) No 216/2008; Regulation (EC) No 736/2006 of the European Commission of 16 May 2006 on the working methods of the European Aviation Safety Agency for conducting standardisation inspections, and in particular Article 8(a) thereof, your country was inspected by the Agency in September 2010 (Continuing Airworthiness) and October 2010 (Initial Airworthiness). The purpose of this Combined Standardisation Inspection was to monitor the application by the Civil Aviation Authority-Ireland of the above-mentioned Regulations and the Implementing Rules, and to report the results to the European Commission.

The open and constructive discussions with the Irish Aviation Authority throughout the visits were much appreciated. On behalf of the inspection team I would like to thank all those involved, in particular Mr Shaw and Mr Butterfield 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.

---

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

<sup>2</sup> 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

<sup>3</sup> 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

<sup>4</sup> 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

tel: +49.221.899.90.6001 • fax: +49.221.899.90.6500 • francesco.banal@easa.europa.eu

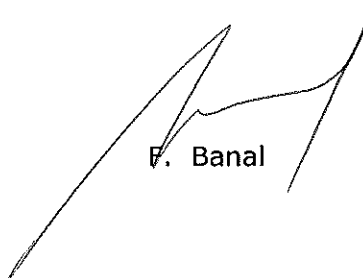
This Combined Standardisation Inspection has highlighted a number of strengths, among which should be quoted the positive attitude of the Irish Aviation Authority staff. However, this inspection has also revealed some areas for improvement.

Since this visit was split over a period of two months (September for Continuing Airworthiness and October for Initial Airworthiness), the individual reports are due at different times. The Final Report on Continuing Airworthiness was sent to you by means of our letter S1 2010(D)55813 dated 10 December 2010. Please find enclosed the report on Initial Airworthiness together with the executive summary for the whole inspection. Please consider each individual Report for the submission of appropriate corrective action plans with regard to deadlines and specific documents to be completed.

This letter and its attachments are also sent to the Mission of Ireland to the European Union as well as 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: Irish Aviation Authority (Mr Butterfield)  
EASA.E (Mr Goudou)



# **Final Report Summary**

## on the EASA Combined Standardisation Inspection of

### **Ireland**

Irish Aviation Authority (IAA)

In the fields of European aviation safety regulations applicable to  
Initial Airworthiness and Continuing Airworthiness

13 – 17 September 2010 and 04 - 07 October 2010

Report ID: **COM.IE.10.2010**

Issued on: 14.12.2010



**Contact and address for enquiries:**

European Aviation Safety Agency  
Approvals & Standardisation Directorate  
Standardisation Department  
Postfach 10 12 53  
D-50452 Cologne  
Germany  
Tel. +49 221 8999 000  
Fax +49 221 8999 099

This Report Summary is distributed to:

1. European Commission, DG-MOVE E
2. Irish Aviation Authority (IAA)
3. State Permanent Representation of Ireland to the European Union
4. EASA S.1

Copy No.: COM.IE.10.2010 2



## **Table of Contents**

Foreword .....	4
Part 1 – Executive Summary .....	5
Outline .....	5
1 - Primary Aviation Legislation .....	5
2 – Specific Operating Regulations .....	5
3 – State civil aviation system and safety oversight functions .....	5
4 – Technical personnel qualification and training .....	5
5 – Technical guidance, tools and the provision of safety critical information .....	6
6 – Licensing, certification, authorisation and approval obligations .....	6
7 – Surveillance obligations .....	6
8 – Resolution of safety concerns .....	6
Conclusions .....	7
Part 2 – Attachments .....	8



## **Foreword**

This report provides an Executive Summary of the results of a Combined Standardisation Inspection of the Irish Aviation Authority – the Competent Authority of Ireland (hereinafter referred to as IAA).

The Inspection was conducted by the Agency from 13 to 17 September 2010 and from 04 to 07 October 2010, and covered the domains of Continuing Airworthiness and Initial Airworthiness.

This report does not contain all the details with regard to the sectorial inspections, nor the findings and observations raised in the course of the Inspection. Such information is contained in the sectorial standardisation reports which are attached to this report or were sent out previously, i.e.:

- for Continuing Airworthiness: Report CAW.IE.09.2010 (sent by EASA letter S1 FBA/GAB 2010 (D) 55813 on 10.12.2010)
- for Initial Airworthiness: Report IAW.IE.10.2010 (Attachment 1 to this report)

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

The EASA team would like to thank the IAA National Coordinators for their availability and support in the course of the whole inspection process, which enabled the programme to be fully completed as planned.



## **Part 1 – Executive Summary**

### **Outline**

The purpose of this Combined Standardisation Inspection was to monitor the application by the Irish Aviation Authority (hereinafter called IAA) of the common rules in the fields of aviation safety, and more specifically in the domains of Initial and Continuing Airworthiness, and to report the results to the European Commission.

The EASA team was composed of four Continuing Airworthiness experts and three Initial Airworthiness experts, one of whom acting as General Team Leader for the whole team.

The key results of the Inspection, with regard to the above mentioned domains, are presented in accordance with the eight Critical Elements (CE) of a Safety Oversight System, as defined by ICAO<sup>3</sup>.

### **1 - Primary Aviation Legislation**

As Ireland is a member of the European Union, EC regulations are fully applicable, namely European Regulations (EC) No 216/2008, (EC) No 1702/2003 and (EC) No 2042/2003 (as amended) are binding and directly applicable.

### **2 – Specific Operating Regulations**

As Ireland is a member of the European Union, EC regulations are fully applicable and the IAA stated that they had adopted all applicable AMCs and GMs issued by EASA.

In the Continuing Airworthiness domain, it was found that the IAA allows that Annex II aircraft be maintained and released by Part M/Subpart F organisations. Further, the Irish Authority considers Search and Rescue operations carried out by a civilian operator under contract for the Irish Coast Guard as falling under the provisions of Basic Regulation.

### **3 – State civil aviation system and safety oversight functions**

The IAA was established by the Irish Aviation Act 1993, as amended by the Statutory Instruments 469 of 2003 and 95 of 2008, as the competent authority for the regulations falling under the scope of this inspection.

In the domain of Initial and Continuing Airworthiness, the IAA organisational structure and staffing was found to be adequate when compared to the size, scope and complexity of the national aviation industry.

The IAA's Headquarters are located in Dublin in a new and well equipped facility. There are no regional offices.

### **4 – Technical personnel qualification and training**

<sup>3</sup> ICAO DOC 9734 - Safety Oversight Manual - Part A: The Establishment and Management of a State's Safety Oversight System (2<sup>nd</sup> Edition, 2006)



The IAA established a general policy and criteria for selection of personnel, as well as for initial and continuation training. The technical staff were found to be properly trained and qualified, therefore knowledgeable and competent for both domains inspected. An electronic system (Sharepoint) has been established to retain the records of completed 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 comprehensive system of manuals and procedures, complemented by an extensive use of check lists. All these documents are published and made available to the staff on IAA intranet. The IT tool (Sharepoint) for recording and monitoring of audits results (including the follow-up) can also be accessed by all the involved team members and team leaders via Intranet.

Moreover, adequate guidance is published on the IAA external website, for the benefit of the regulated industry and interested parties.

## **6 – Licensing, certification, authorisation and approval obligations**

In the field of Initial Airworthiness, even though the investigation process of the Production Organisation under IAA supervision was well performed and documented, the EASA team identified some non-compliances with the applicable requirements related to the scope of work definition in the Production Organisation Exposition and acceptance of calibration process.

Regarding the Continuing Airworthiness domain, the IAA management of the initial approval process has been found adequate, as the relevant regulations and procedures relating to the issue of approvals, licenses, certificates / authorisations are complied with. However, in some sampled cases the contents of the approved expositions had been found to be not fully in line with Part-145.

Further, in one visited Part-M/Subpart G organisation, the sampled Maintenance Programmes approved by IAA did not contain all maintenance required by the aircraft to which they apply.

## **7 – Surveillance obligations**

The planning and recording of the IAA surveillance is maintained in an electronic as well as paper format. The approved production organisation is regularly inspected in accordance with the continued surveillance programme.

In the Continuing Airworthiness areas the surveillance of the approved organisations is sufficiently effective and commensurate to the size and complexity of approved organisations. However, the EASA Team identified a few cases where some findings had been closed without proper root cause analysis. Further, the Aircraft Continuous Airworthiness Monitoring (ACAM) Programme run by IAA does not consider the significant number of aircraft on the Irish register, whose technical oversight has been transferred to other European Member States.

## **8 – Resolution of safety concerns**

IAA has processes and procedures in place to resolve identified deficiencies impacting on safety, should they occur.

In general, the IAA monitors the findings in an adequate manner.



## **Conclusions**

Generally, IAA showed itself to be fully able to discharge its responsibilities as Competent Authority for the fields inspected. The implementation of EU Regulations was considered robust and well-supported by procedures, competent staff and proper safety culture.

During this Combined Standardisation Inspection, a total of **18** non-compliance findings were raised against the IAA, as follows:

- Initial Airworthiness: **4** non-compliance findings, **none** of which raising a safety concern if not promptly corrected;
- Continuing Airworthiness: **14** non-compliance findings, **1** of which raising a safety concern if not promptly corrected.

There were no indications of an Immediate Safety Hazard.

Several findings are based on observations raised at the visited undertakings. The IAA was notified of such observations on 17.09.2010 and 07.10.2010 by means of the two sectorial Preliminary Reports.

The most significant deficiencies, as classified by the Findings Classification Committee, are:

### **Initial Airworthiness:**

- Production Organisation Approval and Subpart F procedures
- Investigation process (Production Organisation Exposition scope of work, calibration process)
- Training process (records, missing evidence)

### **Continuing Airworthiness:**

- The non inclusion in the ACAM programme of the aircraft whose technical oversight has been transferred to other Member States;
- The approval of expositions that are not fully in line with Part-145
- Closure of some findings without root cause analysis



## **Part 2 – Attachments**

Attached to this report is the following sectorial Standardisation Report:

- for Initial Airworthiness: Report IAW.IE.10.2010 (Attachment 1)
- for Continuing Airworthiness: the Report CAW.IE.09.2010 is not attached. This was submitted to the interested parties attached to the EASA S1 FBA/GBA 2010(D)55813 letter dated 10.12.2010.

These reports contain the details of the inspections, and list all the findings raised by the EASA team during the inspection.



**Final Report**  
on the EASA Standardisation Inspection of  
**Ireland**

Irish Aviation Authority (IAA)

In the field of European aviation safety regulations applicable to  
Initial Airworthiness – Production

04 to 07 October 2010

Report ID: IAW.IE.10.2010

Issued on: 14.12.2010

**Attachment 1 to Final Report Summary COM.IE.10.2010**




**Contact and address for enquiries:**

European Aviation Safety Agency  
Approvals & Standardisation Directorate  
Standardisation Department  
Postfach 10 12 53  
D-50452 Koeln  
Germany  
Tel. +49 221 8999 000  
Fax +49 221 8999 099

This Standardisation Inspection Final Report was distributed to:

1. European Commission, DG-MOVE
2. Irish Aviation Authority (IAA)
3. State Permanent Representation of Ireland to the European Union
4. EASA S.1

Copy No.: IAW.IE.10.2010 



## Table of Contents

Foreword .....	4
Part 1 – Executive Summary .....	5
Part 2 – Conduct of the Inspection .....	8
2.1 Background .....	8
2.2 Scope .....	8
2.3 National Coordinator .....	8
2.4 Inspection Team .....	8
2.5 Officials Met .....	8
2.6 Inspection Programme .....	9
2.7 Scale of Activity .....	9
2.8 Additional Information .....	9
Part 3 – Immediate Safety Hazards (ISH) .....	9
Part 4 – Comments of the National Aviation Authority .....	10
Part 5 – Finding Classes and Initial Follow-up .....	11
Part 6 – Status of previous Standardisation Inspection(s) .....	12
Appendix 1 – Findings raised against NAA	



## Foreword

Articles 24.1 and 54 of the Basic Regulation<sup>1</sup> 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 Regulation<sup>2</sup> states that the Agency shall carry out inspections of National Aviation Authorities whereby it shall examine in particular compliance of these [National Aviation] Authorities with the annexes [of the implementing rules].

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 and the Agency expects to receive a formal statement that the NAA has properly handled the observations in accordance with the relevant provisions of Section B.

---

<sup>1</sup> REGULATION (EC) No 216/2008 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 February 2009 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

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



## **Part 1 – Executive Summary**

### **Outline**

This EASA Standardisation Inspection of the Irish Aviation Authority – the Competent Authority of Ireland (hereinafter called IAA), covered Part 21 Subpart A, Subpart F and Subpart G. It was carried out in Ireland with a team composed of three inspectors during a one-week period as a part of the EASA Combined Standardisation Inspection COM.IE.10.2010, which also included the areas of Continuing Airworthiness.

The inspection was the first EASA Standardisation Inspection in the field of Initial Airworthiness (Production) carried out in Ireland in accordance with the Standardisation Regulation (EC) No 736/2006.

During the course of the inspection, one Production Organisation Approval (POA) holder (the only one at the time of the inspection) was visited to sample the IAA's oversight of approved organisations in the area inspected.

This report forms attachment 1 to the combined report ref. COM.IE.10.2010.

### **1 - Primary Aviation Legislation**

As Ireland is a member of the European Union, EC regulations are fully applicable in the inspected field (namely European Regulations (EC) No 216/2008 and (EC) No 1702/2003 (as amended) are binding and directly applicable). The EU Regulations are introduced through Statutory Instrument of the Ministry for Transport (S.I. No. 469 of 2003 introducing (EC) 1592/2002 and its Implementing Rules, amended by S.I. No. 95 of 2008 introducing (EC) 216/2008).

### **2 – Specific Operating Regulations**

The IAA stated that they had adopted all applicable AMCs and GMs issued by EASA besides Annex I (Part-21) of Regulation (EC) 1702/2003 which is fully applicable in the inspected field. The statement is documented through the Procedure for Investigation, approval and continued surveillance of production organisations – POA Handbook, ref. AWSD.435 (dated 12.04.2010) and the Procedure for the evaluation of organisations undertaking production without a POA in accordance with Commission Regulation 1702/2003, ref. AWSD.440 (dated 12.01.2010).

The Chief Executive of the IAA issued an Aeronautical Notice (No. G.9 issue 3 / 12.06.2009) introducing the EU Regulations (e.g. (EC) 1702/2003 and the applicable AMCs and GMs) to the industry.

### **3 – State civil aviation system and safety oversight functions**

The IAA is the designated Competent Authority (Statutory Instrument of the Ministry for Transport S.I. No. 469 of 2003, § 6.) for the areas inspected. The IAA is responsible for conducting the investigation and the surveillance of production organisations in order to issue, renew, change and revoke Part 21 POA certificates (Subpart G) and Letters of Agreement (Subpart F).



The Irish Aviation Authority is a commercial state-sponsored company which was established on 1st January 1994 (under supervision of the Ministry of Transport).

The IAA has 4 Divisions under the Chief Executive: Safety Regulation, Human Resources, Technology & Training and Operations. The Airworthiness Department (AWSD) under the Safety Regulation Division (SRD) deals with all the aspects related to the certification of organisations and products. The AWSD (through Aircraft Registration and Design Control Section) is responsible for approval and surveillance of production organisations. The IAA's Headquarters are located in Dublin. There are no regional offices.

#### **4 – Technical personnel qualification and training**

The IAA employs 3 qualified aeronautical engineers (Airworthiness Officers) performing POA activities (Subpart G and F) and the Assistant Director – Airworthiness Standards is acting as POA Manager. The number of staff is adequate to the number of production organisations under their surveillance and to the complexity and rate of production activity.

The general policy and criteria established for initial and continuation training are contained in the procedure No. SRD 006 / Dec. 2009 – Training Programmes, Training Plans and Training Records. For each person, an annual Training Plan is developed under the responsibility of the Assistant Director (establishing the individual training needs). For the 3 POA inspectors, the plan takes into account the additional requirements described in the procedure No. AWSD.435, Section 10. An electronic system (Sharepoint) has been established to retain the records of completed training. The EASA team verified the competence, expertise and professional preparation of the IAA's aeronautical engineers involved in POA activities and the general results were satisfactory. However, some evidence related to the recurrent training of personnel was missing.

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

The IAA has issued the amendment 2 of the Procedure No. AWSD.435 dated 12.04.2010 (for Part 21 Subpart G activity) and the amendment 0 of the Procedure No. AWSD.440 dated 12.01.2010 (Part 21 Subpart F), which includes the new applicable requirements introduced by Regulation (EC) No. 1194/2009 amending (EC) No 1703/2003. Some comments on the content of these procedures regarding some requirements not covered were raised during the visit.

All the general policies and procedures, the specific Part 21 procedures, the check-lists and the associated forms are available to the IAA staff on their Intranet. The IT tool (Sharepoint) for recording and monitoring of audits results (including the follow-up) can also be accessed by all the involved team members and team leaders via Intranet.

#### **6 – Licensing, certification, authorisation and approval obligations**

The first POA was issued in Ireland in April 2009 and 2 new applications for POA have been received this year. No Letter of Agreement (Subpart F) was issued by the IAA but one application has been received. The process of agreement was not developed due to the withdrawal of the application. The EASA Team identified some non-compliances with the applicable requirements in the investigation process for POA related to the scope of work definition in the Production Organisation Exposition and acceptance of calibration process.



## **7 – Surveillance obligations**

The planning and recording of the IAA surveillance is maintained in an electronic format and also on paper. The approved organisation is regularly inspected in accordance with the continued surveillance programme.

Due to the period of inspection (before completion of a two year period from the issuance of the POA) EASA Team could not verify the complete surveillance process.

## **8 – Resolution of safety concerns**

In general, the IAA monitors the findings in an adequate manner.

## **Conclusions**

During this Standardisation Inspection, a total of 7 findings related to Part 21 were raised against the IAA. There were no indications of any immediate safety hazard.

The technical level of the visited undertaking was very good. However, 5 observations were made. The IAA was notified of these observations on 7 October 2010 by means of the Preliminary Report.

The main findings, as classified by the FCC, are related to:

- POA and Subpart F procedures
- Investigation process (POE scope of work, calibration process)
- Comments related to the training process

The IAA demonstrated a very cooperative attitude throughout this Standardisation Inspection and fully supported the standardisation process. This enabled the programme to be completed as planned.

The EASA team would like to thank the Irish Aviation Authority (IAA) for its openness, full transparency and its positive attitude at all phases throughout the inspection, as well as the very good support given by the National Coordinator, the management and all the IAA staff involved. This contributed to the efficiency and effectiveness of the team and resulted in the conclusions being agreed upon.



## **Part 2 – Conduct of the Inspection**

### **2.1 Background**

A Standardisation Inspection was performed at the Irish Aviation Authority (IAA) in Dublin. The visit took place from 04 to 07 October 2010.

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

This first Initial Airworthiness (IAW) Standardisation Inspection in Ireland was part of a combined inspection which also included the areas of Continuing Airworthiness.

The inspection was conducted in application of Article 24 and pursuant to Article 55 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 (as amended) including the following Implementing Rules:

Commission Regulation (EC) No 1702/2003 as amended up to and including (EC) No 1194/2009

Annex Part 21 Subpart A – General provisions

Part 21 Subpart F – Production without POA

Part 21 Subpart G – Production Organisation Approval

### **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 IAA for the IAW field was Mr Nicholas Butterfield.

### **2.4 Inspection Team**

The EASA inspection team was composed as follows:

Team Leader: Carmen Chiriță, EASA

Team Member: Jiří Nový, EASA

Team Member: Algirdas Baseckas, EASA

### **2.5 Officials Met**

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

Brian Skehan – Assistant Director Airworthiness Standards Department

Eugene O'Sullivan – Manager Aircraft Registration and Design Control

Nicholas Butterfield – Airworthiness Officer / POA National Coordinator

Frank Tone – Airworthiness Officer



Kevin Masterson - Airworthiness Officer

## 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 04 October 2010 in Dublin and concluded with a wrap-up meeting on 07 October 2010 in Dublin.

The inspection was conducted in Dublin, headquarters of the IAA, the competent authority designated by Ireland according to Statutory Instrument of the Ministry for Transport.

The programme also included a visit to the undertaking under the surveillance of the IAA:

- Technical Engineering & Tooling Services Limited (Technical Engineering Group) (Mullingar), IE.21G.0001.

At the closing session held in Dublin on 07 October 2010, pursuant to Article 9 (d) of Regulation (EC) No 736/2006, the appointed POA National Coordinator was provided with a Preliminary Inspection Report, which included a list of requirements reviewed and a list of findings and observations made at the undertaking, together with IAA's comments.

The following officials of the IAA attended the closing session:

Brian Skehan – Assistant Director Airworthiness Standards Department

Eugene O'Sullivan – Manager Aircraft Registration and Design Control

Nicholas Butterfield – Airworthiness Officer / POA National Coordinator

Frank Tone - Airworthiness Officer

Kevin Masterson - Airworthiness Officer

## 2.7 Scale of Activity

The scale of activity of IAA is reflected in the following table:

Number of valid Part 21 Subpart F Letters of Agreement	0
Number of Part 21 Subpart G Production Organisation Approvals	1

## 2.8 Additional Information

None

## Part 3 – Immediate Safety Hazards (ISH)<sup>3</sup>

None



#### **Part 4 – Comments of the National Aviation Authority<sup>4</sup>**

The IAA provided the following comments on the Preliminary report:

"The Irish Aviation Authority has added its initial comments as indicated below and reserves the right to add or amend these in the near future..."

The IAA comments raised against the findings can be found in the attachment **IAW.IE.10.2010 Appendix New Findings**.

"...The IAA would like to thank the EASA investigation team for their clear and fair approach to the audit and the constructive guidance provided."

---

<sup>3</sup> Article 9.1 (d) of Commission Regulation (EC) No 736/2006.

<sup>4</sup> 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;

**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 appendix, the first relevant deadline in the follow-up phase of this standardisation inspection is **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 NAA<sup>5</sup> 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.

---

<sup>5</sup> Article 15(3) of Commission Regulation (EC) No 736/2006.



The attached **Standardisation Inspection of Ireland Final Report number IAW.IE.10.2010 Appendix New Findings** contains all findings from the Preliminary Report of this inspection and the classification made in accordance with Art. 13 of Commission Regulation (EC) No 736/2006.

This appendix consists of a total of 4 pages and 7 findings as follows:

Finding class	Number of findings
(a)	1
(b)	2
(c)	4
(d)	0
(e)	0
(f)	0

#### ***Part 6 – Status of previous Standardisation Inspection(s)***

This was the first Standardisation Inspection related to Initial Airworthiness activities in Ireland.



# Standardisation Inspection of Ireland

## Final Report n° IAW.IE.10.2010

### Appendix New Findings

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

#### Commission Regulation 1702/2003 (PART-21)

**Reference** IE # 11359 Open

**Basis** 21.B.30 (a) - 21.B.220 (c) - 21.B.120 (c)

**Finding** dated 07/10/2010

Some comments/non-compliances regarding the IAA POA Handbook and Subpart F procedure were identified and discussed during the EASA Team Inspection with the IAA.

a) IAA POA Handbook (AWSD.435 dated 12.04.2010):

Examples:

1. The EASA involvement in acceptance of application, in decisions related to the restriction / suspension / revocation of the approval or in mediation of conflicts between IAA and industry is not appropriate.
2. The procedure is not describing the notification of significant changes in IAA organisation and procedures to EASA (21B.35(a)).
3. "Material" is still kept in the text.
4. There is no statement related to the notification to EASA of any difficulty in the implementation of Part 21 (21B.45(b)).
5. The method of formal appointment of POAT Leader and members is not specified.
6. The classification of findings during the initial investigation is not mentioned.
7. The record keeping policy is not updated in accordance with actual situation (electronic archiving)

b) IAA Subpart F Procedure (AWSD.440 dated 12.01.2010):

Examples:

1. The necessity to include or refer the inspection plan in the Letter of Agreement is not mentioned.
2. The process of amending the Letter of Agreement is not described.
3. The case when the holder of the Letter of Agreement would need to continue the activity after the expiration date is not treated.

Note 1:

Currently IAA has no application for Subpart F and no Subpart F Letter of agreement has been issued.

Note 2:

Other comments to the IAA POA Handbook and Subpart F procedure have been communicated to and noted by the National Coordinator during the visit.

**Comment** IAA Preliminary Comment:

In relation to a) 4, section 5.3 (2)(e) of the POA Handbook does address seeking the advice and guidance from EASA on the regulation.

FCC Comment:

IAA Comment noted.

---

**Reference IE #11360 Open**

**Basis** 21.B.25 (c)

**Finding** dated 07/10/2010

The POA Workshop organised by IAA in June 2010 as a recurrent training introducing the EC 1194/2009 didn't cover the ED Decision 2010/001/R with related AMC's and GM's for Part 21.

**Comment**

---

**Reference IE #11364 Open**

**Basis** 21.B.220 (b)

**Finding** dated 07/10/2010

The Scope of Work from a Production Organisation Exposition accepted by IAA is not referring another document detailing the approved scope of work.

**Comment** IAA Preliminary Comment:

The scope of work defined in the specific POE audited by EASA was agreed with the agency at the conclusion of the POA investigation by IAA. However, for clarification, the IAA will ensure that a reference to the DOA/POA arrangements will be included.

FCC Comment:

IAA Comment noted.

---

**Reference IE #11365 Open**

**Basis** 21.B.220 (b)

**Finding** dated 07/10/2010

In one POA organisation the calibration process is not properly managed (there is no instruction related to the performance of in house calibration, the conditions needed for this activity are not established and consequently the room temperature is not controlled). This issue was not properly addressed by the IAA during the investigation for approval.

**Comment** IAA Preliminary Comment:

This finding is accepted, however, calibration was addressed in the Initial investigation of the POA by the Authority and this is reflected in our detailed checklists record.

FCC Comment:

IAA Comment noted.

**Class (b) findings according to Regulation (EC) n° 736/2006 Art. 13**  
**Commission Regulation 1702/2003 (PART-21)**

**Reference IE # 11361 Closed**

**Basis** 21.B.30 (a)

**Finding** dated 07/10/2010

The procedure SRD.006 is not establishing the criteria or requirements for qualification of the training officer who performs the induction training of the new employees.

Note: The induction training contains technical aspects but the qualification training of POA inspectors was provided externally.

**Comment** IAA Preliminary Comment:

The training Officer role and qualifications will be clarified in the Training Syllabus for an Airworthiness Engineer. This applies to a new appointee induction training and the on-the job training, since the technical training for POA is carried out using external courses.

FCC Comment:

IAA Comment noted.

Classified as "b" because qualification of POA Inspector was not affected.

**Reference IE # 11362 Closed**

**Basis** 21.B.25 (c)

**Finding** dated 07/10/2010

The individual Training plan of one Team Leader is recording the regular audits as on-job-training.

**Comment** IAA Preliminary Comment:

The purpose of this was to record currency of the person involved but the IAA accepts that the Training Plan is not the appropriate place to record this.

FCC Comment:

IAA Comment noted.

Classified as "b" because qualification of POA inspector was not affected.

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

**Commission Regulation 1702/2003 (PART-21)**

**Reference** IE # 11363 Closed

**Basis** 21.B.220 (b)

**Finding** dated 07/10/2010

In the process of initial investigation for approval of one production organisation IAA didn't classify the findings raised.

Note: All findings have been closed before issuing the approval.

**Comment** IAA Preliminary Comment:

In this case no classification was carried out during the initial investigation because all issues/findings were closed prior to issuing the approval. Furthermore 21A.158(a) states "When objective evidence is found showing non compliance of the holder of a production organisation approval...." ; in this case the applicant is not yet the holder of a production organisation approval, therefore this does not apply. Notwithstanding that, there may be a need to classify issues and findings if it is necessary to issue an approval prior to all (max 3) level 2 findings being closed. AMC No. 1 to 21B.230 states that "findings must be equivalent to level two". Our procedures reflect this under 5.5 5(a).

FCC Comment :

Classified as "a" because Finding # 11359 is addressing the issue.

All findings raised by IAA during the initial investigation were closed before the issuance of the approval.