

Irish Aviation Authority The Times Building 11–12 D'Olier Street Dublin 2, Ireland www.iaa.ie	Údarás Eitlíochta na hÉireann Foirgneamh na hAmanna 11–12 Sráid D'Olier Baile Átha Cliath 2, Éire	OAM No. 18 Revision: 00 Date: 31.10.25	
--	---	--	--

USE OF ANNEX I AIRCRAFT FOR TRAINING at an ATO or DTO

1. Introduction

- 1.1. The purpose of this advisory memorandum is to set out the general requirements for Approved Training Organisations (ATOs) and Declared Training Organisations (DTOs) that wish to include aircraft that fall under points (a), (b), (c) or (d) of Annex I to Regulation (EU) 2018/1139 in the fleet of the organisation's training aircraft as provided for in ATO.GEN.240 and DTO.GEN.240.
- 1.2. The scope of these aircraft (hereafter 'Annex I' aircraft) may include certain historic, experimental, home-built or military aircraft meeting the criteria set out in Annex I to Regulation (EU) 2018/1139.
- 1.3. These aircraft will typically be required to hold :
 - a) a Certificate of Airworthiness (CoA) compliant with ICAO ANNEX 8 issued by the State of Registry; or,
 - b) a Flight Permit issued in accordance with Irish National Airworthiness regulations.

Note: Aircraft issued with Flight Permits or similar by States other than Ireland shall not be considered for inclusion in the fleet training aircraft at an ATO or DTO in Ireland.

- 1.4. The inclusion of an Annex I aircraft in the fleet of training aircraft at an ATO or DTO must be authorised¹ by the IAA on a case-by-case basis.
- 1.5. Due to the conditions on a Flight Permit prohibiting any commercial use, the conditions for the use of Annex I aircraft holding a (CoA) or a Flight Permit by an ATO or DTO are dealt with separately by this advisory memorandum.

2. Annex I Aircraft that hold an ICAO-level Certificate of Airworthiness (CoA)

- 2.1. ATOs or DTOs proposing to use an Annex I aircraft holding an ICAO ANNEX 8 compliant CoA shall be required to apply to the IAA for authorisation to use the aircraft for training purposes.
- 2.2. The application for the use of the aircraft shall include the following:
 - a) Evidence that the ATO/DTO is the legal operator of the aircraft through an appropriate ownership or lease arrangement;
 - b) Evidence that the aircraft is appropriately insured for the proposed training activities; and
 - c) A detailed assessment² that the aircraft is appropriately equipped and suitable for the training courses provided, which is conducted by an experienced PART-FCL qualified instructor nominated by the ATO/DTO Head of Training.

¹ ORA.ATO.135 Training aircraft and FSTDs (a)(2) / DTO.GEN.240 Training aircraft and FSTDs (a) (2)

² AMC2 ORA.ATO.135 Training aircraft and FSTDs / AMC3 DTO.GEN.240 Training aircraft and FSTDs

Irish Aviation Authority The Times Building 11–12 D'Olier Street Dublin 2, Ireland www.iaa.ie	Údarás Eitlíochta na hÉireann Foirgneamh na hAmanna 11–12 Sráid D'Olier Baile Átha Cliath 2, Éire	OAM No. 18 Revision: 00 Date: 31.10.25	
--	---	--	--

3. Annex I Aircraft that do not hold an ICAO-level CoA³

- 3.1. ATOs or DTOs proposing to use an Annex I aircraft holding a Flight Permit shall be required to apply to the IAA for authorisation to use the aircraft for training purposes;
- 3.2. Due to the non-commercial use limitations of the Flight Permit, consideration shall only be given to non-commercial ATOs or DTOs as defined in (EU) 1321/2014; and
- 3.3. In general, non-commercial ATOs or DTOs in Ireland are registered flying clubs or not for profit organisations made up of members where there is no element of profit for any individual. Non-commercial ATOs or DTOs proposing to use Annex I aircraft holding a Flight Permit shall be required to have procedures to ensure that members are properly briefed that such aircraft do not meet ICAO compliant airworthiness standards.
- 3.4. The IAA shall only consider Annex I aircraft which are registered in Ireland for authorisation.
- 3.5. The application for the use an Annex I aircraft shall include the following:
 - a) Evidence that the ATO/DTO is the legal operator of the aircraft through an appropriate ownership or lease arrangement;
 - b) Evidence that the aircraft is appropriately insured for the proposed training activities; and,
 - c) A detailed assessment⁴ that the aircraft is appropriately equipped and suitable for the training courses provided, which is conducted by an experienced PART-FCL qualified instructor nominated by the ATO/DTO Head of Training.

4. Assessment of Aircraft holding a Flight Permit for Training Purposes

- 4.1. The initial assessment by the IAA shall consider the following criteria⁵:
 - a) aircraft similarities to a certified variant;
 - b) aircraft with a satisfactory in-service experience as training aircraft;
 - c) simple and conventional aircraft design;
 - d) aircraft that does not have hazardous design features or details, judging by experience; and,
 - e) operable aircraft systems, equipment, and appliances that do not require exceptional skills or strength.

³ AMC2 ORA.ATO.135 Training aircraft and FSTDs / AMC3 DTO.GEN.240 Training aircraft and FSTDs

⁴ AMC2 ORA.ATO.135 Training aircraft and FSTDs / AMC3 DTO.GEN.240 Training aircraft and FSTDs

⁵ AMC3 DTO.GEN.240 Training aircraft and FSTDs (1)

Irish Aviation Authority The Times Building 11–12 D'Olier Street Dublin 2, Ireland www.iaa.ie	Údarás Eitlíochta na hÉireann Foirgneamh na hAmanna 11–12 Sráid D'Olier Baile Átha Cliath 2, Éire	OAM No. 18 Revision: 00 Date: 31.10.25	
--	---	--	--

4.2. Additional assessment by a qualified instructor

To support the IAA's evaluation of an aircraft holding a Flight Permit for training purposes the non-commercial ATO/DTO shall be required to provide the following data to confirm that the aircraft in question is suitable:

Evidence that⁶:

- a) the aircraft is safely controllable and manoeuvrable under all anticipated operating conditions, including after failure of one or more propulsion systems;
- b) the aircraft should allow for a smooth transition from one flight phase to another without requiring exceptional piloting skills, alertness, strength, or workload under any probable operating conditions;
- c) the aircraft should have sufficient stability to ensure that the demands made on the pilot are not excessive, considering the phase and duration of flight; and
- d) the assessment should take into account control forces, flight deck environment, pilot workload, and other human factors (HF) considerations, depending on the phase and duration of flight.

5. Additional Airworthiness Requirements for Annex I (c) Aircraft (Home-built Aircraft) :

5.1. In the case of Annex I (c) aircraft, including those supplied in kit form, where at least 51% of the fabrication and assembly tasks are performed by an amateur, or a non-profit making association of amateurs, for their own purposes and without any commercial objective, such aeroplanes must:

- a) hold a valid Flight Permit and an attestation issued by the kit manufacturer after the fabrication and assembly tasks are performed, confirming that the aeroplane complies with the following airworthiness standard requirements:
 - i. BCAR section 'S',
 - ii. DAeC LFT-UL,
 - iii. Czech LAA UL-2, or,
 - iv. an equivalent airworthiness standard acceptable to the Irish Aviation Authority.
- b) be inspected by appropriately designated personnel or an approved maintenance organisation for suitability in terms of build standard and equipage etc.,
- c) have a procedure for the conduct of scheduled and unscheduled maintenance conducted by a person or an organisation acceptable to the IAA who should ensure that the aircraft continuously complies with the maintenance recommendations prescribed by the airframe, engine, and propeller manufacturers/designers, as applicable; and,
- d) be free from modifications that conflict with the above standards or recommendations.

⁶ AMC3 DTO.GEN.240 Training aircraft and FSTDs (a) (2)

Irish Aviation Authority The Times Building 11–12 D'Olier Street Dublin 2, Ireland www.iaa.ie	Údarás Eitlíochta na hÉireann Foirgneamh na hAmanna 11–12 Sráid D'Olier Baile Átha Cliath 2, Éire	OAM No. 18 Revision: 00 Date: 31.10.25	
--	---	--	--

- 5.2. The Authority may inspect the proposed Annex I aircraft to determine suitability for the proposed training course prior to being authorised for training purposes.
- 5.3. Annex I aircraft authorised for training purposes shall have the Flight Permit validity restricted to no more than 12 months.

6. Application for Authorisation to include an Annex I Aircraft in an ATO or DTO Fleet of Training Aircraft:

- 6.1. The Head of Training at an ATO or DTO proposing to add an Annex I aircraft to the fleet of training aircraft should make initial contact with the IAA by contacting the organisation's assigned Flight Operations Inspector for further instructions.
- 6.2. Each case shall be evaluated on a case-by-case basis using the guidance in this advisory memorandum and any other relevant technical or regulatory material as may be applicable.
- 6.3. General enquiries may be sent to fod@iaa.ie

END