



Public Consultation Notice

Irish Aviation Authority Consultation Paper

Consultation on the Proposed Irish Aviation Authority (Nationality and Registration of Aircraft) Order 2026

Introduction

The Irish Aviation Authority (IAA) is commencing a public consultation on the [proposed Irish Aviation Authority \(Nationality and Registration of Aircraft\) Order 2026](#). The proposed Order would replace the Irish Aviation Authority (Nationality and Registration of Aircraft) Order 2015 and update the legal framework governing the nationality and registration of aircraft in the State.

The IAA invites views from aircraft owners, operators, financiers, lessors, aviation undertakings, professional and representative bodies, public authorities and other interested parties. The purpose of the consultation is to identify any legal, operational or practical issues arising from the proposed provisions before the Order is finalised.

No final decision has been taken on the text of the proposed Order. Responses will inform the IAA's consideration of the final regulatory approach.

1. Background

The existing national framework for the registration of aircraft is principally contained in the Irish Aviation Authority (Nationality and Registration of Aircraft) Order 2015. Since that Order was made, there have been developments in European Union aviation law, electronic administration, unmanned aviation and international standards relating to aircraft nationality and registration.

The proposed Order is intended to modernise and consolidate the national framework, while maintaining the core requirements governing eligibility for registration, the aircraft register, certificates of registration, nationality and registration marks, changes of ownership, cancellation of registration and the operation of aircraft in the State.

2. Why is the IAA Consulting?

The proposed Order contains a number of substantive and administrative changes. The IAA wishes to ensure that the revised framework is clear, workable and proportionate, and that any implications for affected persons are identified before the Order is adopted.

The consultation is particularly intended to obtain views on:

- the proposed eligibility and ownership conditions for registration;
- the registration of aircraft operated under lease, charter by demise, hire-purchase or similar arrangements;
- electronic applications, an electronic aircraft register and electronic certificates of registration;
- the proposed statutory framework for noting charges, including mortgages and liens, over aircraft;
- the assignment and use of nationality and registration marks, including the proposed use of the nationality mark "EJ" at the discretion of the IAA;

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- requirements relating to unmanned aircraft systems and operator identification;
- cancellation, alteration and continuity of registrations; and
- the transitional arrangements for existing registrations, certificates, approvals, exemptions and reserved marks.

3. Policy Objective

The objective of the proposed Order is to provide a modern, clear and effective framework for aircraft nationality and registration in the State. In particular, the proposed framework seeks to:

- support compliance with the Chicago Convention and Annex 7 concerning aircraft nationality and registration;
- reflect relevant developments in European Union aviation law;
- provide a clear legal basis for electronic registration processes and electronic certificates;
- improve the transparency and administration of the aircraft register;
- provide a statutory basis for the notation of charges over aircraft without determining the validity, enforceability or priority of those charges;
- modernise terminology relating to unmanned aircraft and remotely piloted aircraft; and
- preserve continuity for registrations and related instruments already in force.

4. Overview of the Proposed Order

The proposed Order is structured in six Parts and two Schedules. Its principal provisions are summarised below.

Eligibility and conditions for registration

The proposed Order retains eligibility requirements based on ownership by qualifying Irish or European Union citizens and companies, while also providing for registration in specified leasing, hire-purchase and other circumstances. The IAA may impose conditions concerning the management, operation and basing of an aircraft and may refuse or discontinue registration where applicable safety, airworthiness, environmental or public-interest requirements are not met.

Applications and the aircraft register

Applications would be made in the form specified by the IAA and submitted electronically. The IAA may require information and supporting evidence concerning the aircraft, ownership, leasing and operation. The aircraft register would record prescribed particulars, including the registered owner, aircraft details, registration marks, certificate number and basis of registration.

Noting of charges

A new statutory framework would permit the IAA, on application, to note the existence of a charge, mortgage or lien over an aircraft. It would also provide for recording satisfaction or release, notifying a recorded charge holder where registration is to be cancelled, and removing an inaccurate or unsupported notation following notice and an opportunity to make representations. A notation

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would not itself create, perfect, vary or extinguish a charge, determine its validity or priority, or confer authority to request deregistration.

Certificates and electronic administration

The proposed Order would provide for an electronic register and for electronic certificates of registration signed with a qualified electronic signature to have the same legal effect as paper certificates. Existing rules concerning the validity, return, replacement and non-transferability of certificates would continue in updated form.

Nationality and registration marks

The proposed Order would continue the use of “EI” followed by three capital letters and would permit the IAA, at its discretion and subject to conditions or criteria, to assign “EJ” followed by four capital letters. It also sets out rules on reservation, display, cancellation and alteration of marks. Schedule 1 specifies the affixing, location, dimensions and form of marks for different classes of aircraft.

Unmanned aircraft systems

The proposed Order would enable the IAA to establish registration requirements for unmanned aircraft systems and UAS operators consistent with applicable European Union requirements, and to prescribe requirements concerning operator identification and remote identification.

Enforcement, cancellation and transitional provisions

The proposed Order would retain powers relating to the prevention of unlawful flights, notification of ownership changes, destruction or permanent withdrawal from use, falsification of certificates and cancellation of registration. Transitional provisions would preserve existing registrations and related instruments and would continue existing notations of charges and pending applications under the new framework.

5. Potential Impacts and Matters for Consideration

The proposed changes are intended to improve legal clarity and administrative efficiency. They may nevertheless have practical implications for applicants, registered owners, operators, lessors, financiers and professional advisers. The IAA particularly welcomes evidence on:

- the documentation and information likely to be required for electronic applications;
- the interaction between ownership, leasing and operational control in determining eligibility for registration;
- the operation of the proposed procedure for noting and releasing charges;
- the proposed notice and representation periods relating to charges and cancellation;
- the use of electronic certificates in domestic and international operations;
- the practical application of the proposed “EJ” mark;
- any implications for aircraft already registered or marks already reserved; and
- any disproportionate administrative, legal or financial burden that may arise.

6. Consultation Questions

Question 1

Do you agree with the overall approach and objectives of the proposed Order? Please give reasons for your answer.

Question 2

Are the proposed eligibility requirements, registration conditions and grounds for refusal or cancellation clear, proportionate and workable?

Question 3

Electronic registration: Are the proposed arrangements for electronic applications, the aircraft register and certificates of registration practical and accessible? What safeguards or alternative arrangements, if any, are needed where electronic processes cannot be used?

Question 4

Noting of charges: Is the proposed framework for noting charges over aircraft clear and workable, including its application requirements, notification procedures and arrangements for recording satisfaction or release? Is the limited legal effect of a notation sufficiently clear?

Question 5

Nationality and registration marks: Are the proposed arrangements for allocating, reserving and displaying nationality and registration marks, including the use of “EI” and “EJ”, clear and appropriate?

Question 6

Unmanned aircraft systems: Are the proposed provisions concerning unmanned aircraft systems, operator identification and remote identification clear and compatible with existing regulatory arrangements? Please identify any gaps or potential duplication.

Question 7

Implementation and other impacts: Are the transitional arrangements sufficient, and would the proposed Order create any legal, operational, financial or administrative difficulties? Please identify any other drafting issues or unintended consequences and suggest changes where possible.

7. How to Respond

The IAA welcomes written submissions and observations on the proposed Order and on the questions set out in this consultation paper.

Responses should be submitted by 20 November 2026 using [Irish Aviation Authority \(Nationality and Registration of Aircraft\) Order 2026 Consultation](#)

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Response form QR code

Respondents should identify the provisions of the proposed Order to which their comments relate and should provide reasons and supporting evidence where possible. Respondents should also indicate whether any part of their submission is considered confidential and explain the basis for that request. The IAA may publish submissions received, subject to applicable legal obligations and the treatment of genuinely confidential information.

8. Conclusion

The proposed Order is intended to provide an updated and coherent framework for the nationality and registration of aircraft in the State. It would modernise registration administration, provide for electronic processes, establish a statutory basis for noting charges, update provisions relating to aircraft marks and unmanned aircraft, and preserve continuity under the existing framework.

The IAA has not reached a final conclusion on the text of the proposed Order. It welcomes informed and practical views from all interested parties before the provisions are finalised.

Important Note

This consultation paper is intended to facilitate public engagement on the proposed regulatory framework. It is not a legal interpretation of the draft Order and does not affect the application of existing law. Respondents should review the draft Irish Aviation Authority (Nationality and Registration of Aircraft) Order 2026 when preparing their submissions.

[Irish Aviation Authority \(Nationality and Registration of Aircraft\) Draft Order](#)

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