

Aviation Stakeholder Forum Report #2 – March 2024

In accordance with Article 76 of SI #40 of 2022, Air Navigation and Transport Act 2022 (hereinafter referred to as ANTA 2022), an aviation stakeholder forum has been established and operates in accordance with agreed Terms of Reference for the Forum visit [Aviation Stakeholder Forum \(iaa.ie\)](https://iaa.ie).

The second meeting of the Forum was held on 27th March 2024 with 53 in attendance representing a cross section of organisations. 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 Opening remarks and Agenda

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?

The Chair welcomed Forum members to IAA HQ. A brief overview of the agenda was provided which included presentations:

- from IAA on safety performance statistics, significant regulatory changes and cyber security
- from EPA on Halon usage on aircraft
- from IAA and AirNav Ireland on risks associated with incorrect QNH setting errors.

Adequate time was provided at the end of each presentation for facilitate Q&A.

2 Safety Performance Overview:

The IAA presented the highlights from latest Irish safety performance statistics. This information will be published in the 2024 edition of the Annual Safety Performance Review, visit [Annual Safety Performance Reviews \(iaa.ie\)](https://iaa.ie).

The top tier SPIs (accidents and serious incidents) were reviewed, and the overall picture was positive for 2023 with no fatal accidents occurring and the total number of accidents and serious incidents lower than in 2022. The presentation also reviewed the main causes of accidents and serious incidents across different sectors. The occurrence reporting rate increases in commercial aviation during 2023 and the associated trends in the National Safety Performance Indicators were reviewed.

There followed some detailed discussions among Forum members relating to:

- the currency of definitions of accidents and serious incidents in ICAO Annex 13
- information sharing processes on safety occurrences across the aviation system

3 Update on Key regulatory Changes

The IAA provided a brief update on current regulatory changes addressing:

- Cybersecurity (see also agenda item 4)

- VTOL rules
- Part FCL omnibus regulation
- Aerodrome rules
- 5G impact on Radio Altimeters

The EPA presented the latest status on Halon use, highlighting the requirements for reporting on the use of Halons on Aircraft and forthcoming changes to regulations (including inclusion of new types of Halons) and what that means for the aviation industry. The EPA emphasised the deadline for Halon use returns as **31/03/2024** and stressed importance for all impacted to report any continued use of Halon by this date.

4 Update on Cybersecurity regulations:

The IAA presented on the different but synergistic regulations in this domain, including NIS II, CER and Part IS, and highlighted related timelines for their implementation over the next three years. The IAA intended to fully engage with Stakeholders on the implementation and oversight of these regulations and welcomed the opportunity to address this issue at the Aviation Stakeholder Forum.

The following question was posed to the Forum

“What would you like to see in the IAA Policy on oversight of cybersecurity regulations?”

The main priorities identified by Forum were:

- If possible, a single regulator should be empowered for the different cybersecurity regulations enabling an integrated oversight approach (eg single audit)
- Regulations and oversight should be agile enough to keep pace with the changing risk picture
- Differentiation between cyber risks impacting safety of flight and cyber risks impacting organisational business systems
- Information management systems should leverage existing SMS processes as much as possible and avoid the need for separate solutions
- Use of industry standards, where possible, noting that some regulations specify standards.

The IAA thanked members for the feedback and was pleased to advise that the matters raised consistent with the direction the IAA was going in the development of the oversight policy, subject to assignment of the necessary powers. The additional feedback will be taken on-board and further stakeholder workshops are being planned.

5 Safety Issue: QNH setting errors:

The IAA and AirNav Ireland made synergistic presentations addressing the risks associated with incorrect QNH settings on aircraft.

The IAA presentation focused on recently issued ICAO EUR OPS Bulletin 2023-001 and related EASA SIB 2023-03 that identified risks of CFIT during APV approaches with Baro aided Vertical Guidance, including identification of multiple causal factors for errors in the setting of QNH. This guidance also

includes recommendations for ANSP's and Aircraft operators to help mitigate the risks and includes links to very useful information on this subject.

AirNav Ireland focused on the specific risk area of Level Bust and the outcome of AirNav Ireland assessment of this risk through their SMS processes. A particular concern is the level bust events where the initial response of the aircraft is to climb following a clearance to descend and this has been attributed to some causal factors originating in the flight deck, including incorrect setting of QNH. It was also noted that lower Transition Altitudes provide less time for flight crew to spot and correct QNH error settings due to increased workload during the approach.

There followed some discussions among Forum members addressing:

- Ongoing work at EASA ATM/ANS Technical Board to address this risk
- The pro/cons of using NOTAMs to address specific local airport concerns
- The pro/cons of implementing a higher Transition Altitude

6. Any other business

Among the items discussed were:

- a) Integrated SMS
The IAA confirmed that it was supportive of the principle but scheduling the availability of key staff may be problematic (for the organisation and authority). It was also noted that the IAA processes for organisation risk profiling provides the basis for IAA cross domain assessment of an organisations SMS across multiple certificates.
- b) GNSS Interference
There has been an increase in GPS Jamming and Spoofing near conflict zones (Ukraine and Gaza) impacting aircraft navigation and warning systems. EASA SIB 2022-02R2, issued Nov 2023 includes recommendations for ANSPs and airlines to address this risk.
- c) Hybrid Meetings of the Forum
Some members requested if the option could be made available to attend Forum meetings remotely. Whereas it was acknowledged that the hybrid option would be beneficial for Members that need to travel longer distances, the consensus of the meeting was that the Forum should continue to be held as an in-person meeting at this time, as this provides for improved collaboration and engagement for Members with each other and also helps to build trust in the meeting itself.

7. Closing Remarks

The IAA summarised the proceedings and thanked the presenters for their interesting and informative presentations and thanked members for their participation and engagement in the meeting. The importance of meeting in this Forum twice a year was highlighted, and the consensus reached to continue to hold the meeting as an in-person event was supported.

8 Next Meeting

The next meeting of ASF will be planned for October 2024.