

Safety Recommendation Number:	IRLD2021006
AAIU Event Reference:	IRL00917016
AAIU Report Number:	2021-008
Date of Publication of Safety Recommendation:	5 November 2021
Safety Recommendation Status:	Implemented, closed

Safety Recommendation:

The IAA should require an operator that has exemptions from Standard Rules of the Air to state the minimum height at which each leg of its company routes can be flown.

Response:

On 02 February 2022, and in subsequent engagement with the AAIU, the IAA provided the following response to this Safety Recommendation:

"The IAA accepts this safety recommendation.

Background information:

- The approved Instrument Flight Procedures (e.g. standard instrument approaches and departures to airports) are published in the State's AIP and must meet relevant ICAO and EU standards including initial and ongoing requirements for maintaining navigation accuracy and obstacle protection.*
- The SAR operator has developed its own 'company routes' and associated route guides to support visual navigation to/from a number of locations (e.g. remote sites, including fueling locations, hospitals, etc). The SAR operator company routes were developed as a supplemental aid to visual navigation under conditions specified in the exemptions from SERA.*

Actions Taken (SAR):

- During 2021, the SAR operator re-applied to the IAA for the exemptions required to conduct SAR activities based on their latest updated procedures, and the application was supported by a full safety case, including specification of the day and night Minimum Descent Heights associated with all legs of all company routes (i.e. these are standard MDHs). The exemptions were granted by the IAA in December 2021.*
- IAA procedures (ASD.260) were reviewed and updated to require that any operator that has exemptions from the SERA state the minimum height at which each leg of its company routes can be flown.*

Outstanding Actions (SAR):

- Action completed.*
- The SAR rules currently being finalised (see response to AAIU Recommendation IRLD2021030) will include regulatory requirements with*

regard to the use of company routes and any associated conditions and limitations. These SAR rules are already reflected in the operator's operating manuals, and will be published in general form in Q2 2022. The on-going oversight programme of the SAR operator will audit against these regulatory requirements.

Outstanding Actions (Non-SAR):

- In so far as Non-SAR operators with permissions/exemptions regarding the SERA use pre-defined company routes, the same regulatory requirements apply."*

On 22 December 2022, the IAA provided the following updated response to this Safety Recommendation:

"Background information:

- The approved Instrument Flight Procedures (e.g. standard instrument approaches and departures to airports) are published in the State's AIP and must meet relevant ICAO and EU standards including initial and ongoing requirements for maintaining navigation accuracy and obstacle protection.*
- The SAR operator has developed its own 'company routes' and associated route guides to support visual navigation to/from a number of locations (e.g. remote sites, including fueling locations, hospitals, etc). The SAR operator company routes were developed as a supplemental aid to visual navigation under conditions specified in the exemptions from SERA.*

Actions Taken:

- During 2021, the SAR operator re-applied to the IAA for the exemptions required to conduct SAR activities based on their latest updated procedures, and the application was supported by a full safety case, including specification of the day and night Minimum Descent Heights associated with all legs of all company routes (i.e. these are standard MDHs). The exemptions were granted by the IAA in December 2021.*
- IAA procedures were reviewed and updated to require that any operator that has exemptions from the SERA state the minimum height at which each leg of its company routes can be flown.*
- The SAR rules issued as an Appendix to IAA Aeronautical Notice O.76, issue 3, dated 01/06/2022, include regulatory requirements with regard to the use of operator pre-defined routes (company routes) and any associated conditions and limitations. These SAR rules are already reflected in the operator's operating manuals and are subject to the on-going oversight programme of the SAR operator."*

AAIU Comment:

The AAIU notes the IAA's response of 02 February 2022.

The AAIU notes that activities are planned for completion in Q2 2022. The AAIU also notes that while the Safety Recommendation suggested that the IAA should require operator's to state 'the minimum height at which each leg of its company routes can be flown' the IAA has adopted an approach that should achieve the same safety benefit by allowing operators to nominate a single safe altitude for a route in its entirety, and this altitude applies to all route legs.

The AAIU considers the status of this Safety Recommendation to be 'In Process of Implementation'.

The AAIU notes the IAA's response of 22 December 2022.

The AAIU consider the status of this Safety Recommendation to be 'Implemented, closed'.