



Enforcement

Aim





The aim of this session is to provide guidance for the criteria and procedures for National Authorities (CAA) to follow should an aerodrome be identified as requiring enforcement.

In the UK aerodromes can be subject to Special Attention or to be put On Notice.

ICAO Doc 9981 PANS Aerodromes





I-2-16 Procedures — Aerodromes

2.5.8 Increased oversight

- 2.5.8.1 When an aerodrome's corrective action plan does not ensure that appropriate corrective action has been taken within acceptable timelines, and after coordination between the State and the operator, the State may decide that increased oversight of this operator is necessary. The scope of increased oversight may cover specific subjects or be all-encompassing.
 - 2.5.8.2 The State should notify the aerodrome operator in writing:
 - a) that it is being placed under increased oversight and outline the subjects concerned and from which date;
 - b) the reasons for the increased oversight and what it consists of; and
 - c) what actions are required by the aerodrome.
 - 2.5.8.3 When an aerodrome is placed under increased oversight, the State should:
 - a) carry out appropriate oversight actions on the subjects concerned;
 - b) follow very carefully the implementation of the corrective actions plan; and
 - c) allocate sufficient time/resources to the oversight of the concerned aerodrome.
- 2.5.8.4 The oversight actions carried out under increased oversight are the same as those carried out normally, but are more exhaustive and address all the subjects concerned.
- 2.5.8.5 When increased oversight is concluded on an aerodrome for a specific subject, the State should advise the aerodrome operator in writing, stating the end of the procedure and the reason.
- 2.5.8.6 The aerodrome certificate can be amended, suspended or revoked according to the outcome of the increased oversight.

EASA - Findings, observations, corrective actions and enforcement measures





- Enforcement measures:
 - Financial penalties
 - Raising findings from L2 to L1 if not addressed
 - Correspondence and/or meeting with the accountable manager
 - 4) Certificate limitation or suspension
- UK CAA uses 2 means of enforcement:
 - Special Attention
 - On Notice

Increased Oversight





- The need for additional regulatory oversight may be due to:
 - Failure to meet agreed timescales to action audit reports;
 - Failure to develop and meet corrective action plans
 - Identification of repetitive non-compliances;
 - Level 1 non-compliances;
 - Numerous Level 2 non-compliances;
 - Breaches of the Air Navigation Order (ANO) or licence conditions;
 - Items identified at internal safety review meetings.

UK - Special Attention





When an aerodrome requires increased regulatory oversight:

- In order to observe large complex developments
- 2) Significant operational changes or
- 3) When an aerodrome fails to achieve and/or maintain a satisfactory standard of compliance

The aerodrome shall be identified as requiring 'Special Attention'.

As part of the UK CAA's Management System a procedure is in place when an aerodrome has been identified as requiring Special Attention.

Special Attention

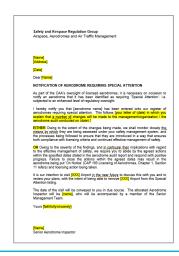




Procedures

- Any other significant factor, such as extensive development, large increase in movements and/or changes in aircraft size, failure to communicate or changes in those persons with management safety accountabilities.
- NB: In the case of significant changes to Group management structure, the Group and associated aerodromes may warrant additional regulatory oversight.

Special Attention Procedure and Special Attention Notification letter



UK - On Notice





Procedure

- Where additional oversight of licence/certificate holders is in place due to Special Attention and the holders continues to perform below the standards required then an "On Notice" procedure can be applied.
- It is a process that provides for urgent or immediate regulatory action to suspend or revoke the certificate.
- Suspension or revocation will not take place without consulting the CAA Legal team.

Special Attention or On Notice





Procedures

- Aerodromes that have been identified as meeting one or more of the above criteria should be brought to the attention of the NAA Senior Management Team.
- Following notification by an Inspector, the Senior Management
 Team will determine the method and degree of additional
 oversight required and will also determine the appropriate criteria
 for the exit strategy.
- The management team will send a standard letter to communicate the situation to the aerodrome accountable manager.
- Progress of 'Special Attention' aerodromes will be discussed at the weekly management meetings as required. This will be relevant in deciding the exit strategy criteria, to decide if an aerodrome remains on the 'Special Attention' list.

On Notice





Procedure

The following are some of the potential initiating events that may lead to On Notice:

- High numbers of defects being left open for long periods;
- Poor management attitude towards regulatory compliance;
- Unstable or ineffective management;
- Instability caused by significant changes in organisation structure or personnel;
- Degradation of safety performance;
- Management unwilling to take necessary safety actions.

On Notice





Procedure

The CAA will expect to see an improvement in safety performance as the organisation continues to be monitored. The On Notice notification may be lifted if the organisation's actions address our concerns. However, if the situation continues to deteriorate, it may result in our taking action to limit, suspend or revoke the licence/certificate held by the organisation as required by the regulatory requirements.

If an aerodrome certificate is revoked the aerodrome will be subject to the full certification procedure.

Summary





- Tools are available to manage poor performance of regulated entities
- The oversight is the same as usual but will be more in depth and may cover more areas





Thank you Any Questions?