



Enforcement

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CAA International, part of the UK Civil Aviation Authority

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.

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:
 - 1) Financial penalties
 - 2) Raising findings from L2 to L1 if not addressed
 - 3) 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.

When an aerodrome requires increased regulatory oversight:

- 1) 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.

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

Safety and Airspace Regulation Group
Airspace, Aerodromes and Air Traffic Management

[Name]
[Address]
[Date]

Dear [Name]

NOTIFICATION OF AERODROME REQUIRING SPECIAL ATTENTION

As part of the CAA's oversight of licensed aerodromes, it is necessary on occasion to notify an aerodrome that it has been identified as requiring 'Special Attention'. It is subjected to an enhanced level of regulatory oversight.

I hereby notify you that [aerodrome name] has been entered onto our register of aerodromes requiring special attention. This follows [your letter of] [date] in which you advised that a number of changes will be made to the management organisation, the aerodrome audit conducted on [date].

NOTE: Owing to the extent of the changes being made, we shall monitor closely the progress of any changes they are being processed under your safety management system, and the processes being followed to ensure that they are introduced in a way that ensures both compliance with licensing criteria and continued effective management of safety.

OR: Owing to the severity of the findings, and in particular their implications with regard to the effective management of safety, we require you to abide by the agreed actions within the specified dates stated in the aerodrome audit report and respond with positive progress. Failure to close the actions within the agreed dates may result in the aerodrome being put 'On Notice' (CAP 105 Licensing of Aerodromes, Chapter 1, Section 11 refers) and licensing action being taken.

It is our intention to visit [Name] Airport on the date of this page to discuss this with you and to review your plans, with the intent of being able to remove [Name] Airport from the Special Attention listing.

The date of the visit will be conveyed to you in due course. The allocated Aerodrome Inspector will be [Name], who will be accompanied by a member of the Senior Management Team.

Yours faithfully,
[Name]
Senior Aerodrome Inspector



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.

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.

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.

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



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Thank you Any Questions?

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