

GEN 1.7 DIFFERENCES FROM ICAO STANDARDS, RECOMMENDED PRACTICES AND PROCEDURES

ANNEX 1 - Personnel Licensing - Eleventh Edition

| Reference | Difference | Remarks |
|-----------------------------|---|--|
| Chapter 1 1.2.5.1.1 | The SMS and SSP related provisions will be fully implemented at the European level when relevant Implementing Rules (IRs) deriving from the EC Regulation 216/2008 come into effect. This will most probably be after the applicability date of this ICAO standard but not later than 08 April 2012. | In accordance with Article 70 of the EC Regulation 216/2008, relevant IRs shall apply not later than 08 April 2012. |
| Chapter 1 1.2.5.2.6 | Ireland does not defer medical examinations | Ireland applies the requirements of PART-MED (Medical) which does not permit the deferral of a medical examination |
| Chapter 2 2.1.3.1.1 | Class ratings for helicopters are not established. | Ireland applies the requirements of PART-FCL (Helicopter) which requires the issue of a type rating for each type of helicopter. |
| Chapter 2 2.1.9.2 | The holder of a pilot licence, when acting as Co-pilot, is entitled to be credited with all of the Co-pilot time towards the total flight time required for a higher grade of pilot licence. | Ireland applies the requirements of PART-FCL (Aeroplane) & PART-FCL (Helicopter) |
| Chapter 2 2.3.3.1.1 | The applicant shall have completed not less than 45 hours of flight time as a pilot of aeroplanes | Ireland applies the requirements of PART-FCL (Aeroplane) |
| Chapter 2 2.3.4.1.1 | The applicant shall have completed not less than 45 hours of flight time as a pilot of helicopters. | Ireland applies the requirements of PART-FCL (Helicopter) |
| Chapter 2 2.4.4.1.1.1(a) | The applicant shall have completed at least 50 hours as pilot-in-command | Ireland applies the requirements of PART-FCL (Helicopter) |
| Chapter 2 2.6.3.1.1.1 | In addition, the applicant shall have at least 500 hours in multi-pilot operations on aeroplanes type certificated in accordance with the JAR/EASA-CS/FAR-25 Transport category or the JAR/EASA-CS/FAR-23 Commuter category, or BCAR or AIR 2051 | Ireland applies the requirements of PART-FCL (Aeroplane) |
| Chapter 2 2.6.3.2 | In addition, the applicant shall have received instruction in multi-crew co-operation | Ireland applies the requirements of PART-FCL (Aeroplane) |
| Chapter 2 2.6.4.1.1.1 | In addition, the applicant shall have at least 350 hours in multi-pilot helicopters | Ireland applies the requirements of PART-FCL (Helicopter) |
| Chapter 2 2.6.4.1.1.1(a) | The applicant shall have completed at least 250 hours, either as pilot-in-command, or at least 100 hours as pilot-in-command and 150 hours as pilot-in-command under supervision; OR 250 hours as pilot-in-command under supervision on multi-pilot helicopters, and the ATPL privileges shall be limited to multi-pilot operations only; | Ireland applies the requirements of PART-FCL (Helicopter) |
| Chapter 2 2.6.4.1.1.1(d) | The applicant shall have completed at least 100 hours of night flight as pilot-in-command or as co-pilot | Ireland applies the requirements of PART-FCL (Helicopter) |
| Chapter 2 2.6.4.2 | In addition, the applicant shall have received instruction in multi-crew co-operation | Ireland applies the requirements of PART-FCL |
| Chapter 2 2.7.1.3.2 | A PPL applicant for an Instrument rating is not required to comply with the physical, mental & visual requirements for the issue of a Class 1 Medical Assessment. | Ireland applies the requirements of PART-FCL |
| Chapter 2 2.7.3.2 (b) | A maximum of 35 hours of instrument ground time is permitted for a Single-engine IR (Aeroplane or Helicopter), and a maximum of 40 hours instrument ground time is permitted for a multi-engine IR (Aeroplane or Helicopter). | Ireland applies the requirements of PART-FCL |

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|------------------------|---|--|
| Chapter 2 2.9 | Provision of a Glider Pilot licence which is compliant with Annex 1. | Ireland applies the requirements of PART-FCL for the provision of a "Sailplane" Licence |
| Chapter 2 2.10 | Ireland issues Private pilot and Commercial Pilot licences for free balloons | Ireland applies the requirements of PART-FCL |
| Chapter 3 3.2 | Ireland does not issue Flight Navigator licences | |
| Chapter 3 3.3.1.2 | The applicant for a Flight Engineer Licence shall demonstrate a level of knowledge appropriate to an ATPL (Aeroplane) | Ireland applies the requirements of JAR-FCL 4 (Flight Engineer) |
| Chapter 3 3.3.1.5 | The applicant shall hold a valid Class 1 medical certificate. | Ireland applies the requirements of JAR-FCL 4 (Flight Engineer) |
| Chapter 4 4.2.1.4 | Ireland does not require the completion of a course of training for certain aircraft types | Ireland applies the requirements of EC Regulation 1321/2014, Annex III (Part 66). Executive Decision 2008/003/R allows for the granting of type ratings based on type examination for certain non large, non-complex aircraft types. In respect of aircraft excluded by EC Regulation 216/2008, Irish National regulations (S.I. 333 of 2000) do not require an applicant with previous experience on type to complete a course of training |
| Chapter 4 4.5.3.4 | Unit Training Plans ensure the continued competency of a controller to exercise his/her privileges. These plans normally relate to a 12 month period. Regulation (EC) No 1108/2009 amending Regulation (EC) 216/2008 in the field of aerodromes, air traffic management and air navigation services gives EASA competence for rule making in the area of ATC licensing. | |
| Chapter 4 4.6 | Ireland does not issue Flight Operations Officer / Flight Dispatcher licences | The activity is controlled as part of the approval of an Air Operator's Certificate |
| Chapter 4 4.7 | The licence is issued as a Radio Officer Licence | |
| Chapter 5 5.1.1.2 | The Date of Birth appears under Section XIV on all flight crew & ATC licences | In respect of flight crew licences, Ireland applies the licence format requirements of JAR-FCL. In respect of ATC licences, Ireland applies the licence format requirements of EU Regulation 805/2011. |
| Chapter 5 5.1.1.2 | All required details are entered on Aircraft maintenance Licences issued in accordance with EC Regulation 1321/2014, Annex III (Part 66), however, the order in which they are entered is not in accordance with Annex 1. | In respect of EASA Aircraft Maintenance Licences, Ireland applies the licence format (EASA Form 26) requirements of EC Regulation 1321/2014, Annex III (Part 66). |
| Chapter 5 5.1.4 | Item headings on EASA Aircraft Maintenance Licences are uniformly numbered in Arabic numerals | In respect of EASA Aircraft Maintenance Licences, Ireland applies the licence format (EASA Form 26) requirements of EC Regulation 1321/2014, Annex III (Part 66). |
| Chapter 6 6.2.5.5 | Applicants are tested by pure-tone audiometry only if an Instrument rating is to be added to the applicable licence, in which case, a hearing test with pure tone audiometry is required at the first examination for the rating and shall be repeated every five years up to the 40th birthday and every two years thereafter. | Ireland applies the requirements of PART-MED (Medical) |
| Chapter 6 6.3.1.2.1 | No examinations are allowed to be omitted | Ireland applies the requirements of PART-MED (Medical) |

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| Reference | Difference | Remarks |
|------------------------|--|--|
| Chapter 6 6.3.2.2.1 | Use of Anti-depressants | Ireland applies the requirements of PART-MED (Medical) |
| Chapter 6 6.3.2.9.1 | Posterior/anterior chest radiography may be required when indicated on clinical or epidemiological grounds | Ireland applies the requirements of PART-MED (Medical) |
| Chapter 6 6.4.2.2.1 | Use of Anti-depressants | Ireland applies the requirements of PART-MED (Medical) |
| Chapter 6 6.4.2.6.1 | Electrocardiography shall be included in every re-examination of applicants after the age of 40 | Ireland applies the requirements of PART-MED (Medical) |
| Chapter 6 6.5.1.2 | Holders of air traffic controller licences shall have their Class 3 Medical Assessments renewed at intervals not exceeding 24 months | Ireland applies the requirements of Article 16 of EU Regulation 805/2011 |

ANNEX 2- Rules Of The Air - Tenth Edition

| Reference | Difference | Remarks |
|---------------------------------|--|--|
| Chapter 3 3.2.2 | '(b) An aircraft that is aware that the manoeuvrability of another aircraft is impaired shall give way to that aircraft.' | New provision. Implementing Regulation (EU) No 923/2012, SERA.3210(b) |
| Chapter 3 3.2.2.4 | '(i) Sailplanes overtaking. A sailplane overtaking another sailplane may alter its course to the right or to the left.' | New provision. Implementing Regulation (EU) No 923/2012, paragraph SERA.3210 (c)(3)(i) differs from ICAO Standard in Annex 2, 3.2.2.4 |
| Chapter 3 3.2.3.2 (b) | '(2) unless stationary and otherwise adequately illuminated, all aircraft on the movement area of an aerodrome shall display lights intended to indicate the extremities of their structure, <u>as far as practicable</u> .' | Implementing regulation (EU) No 923/2012, paragraph SERA.3215 (b)(2), specifies (with the addition to ICAO Standard in Annex 2, 3.2.3.2 (b) of the underlined text) |
| Chapter 3 3.2.5 (c) and (d) | '(c) <u>except for balloons</u> , make all turns to the left, when approaching for a landing and after taking off, unless otherwise indicated, or instructed by ATC (d) <u>except for balloons</u> , land and take off into the wind unless safety, the runway configuration, or air traffic considerations determine that a different direction is preferable.' | Implementing Regulation (EU) No 923/2012, paragraph SERA.3225 differs from ICAO Standard in Annex 2, 3.2.5(c) and 3.2.5(d) in that it specifies that subparagraphs (c) and (d) do not apply to balloons. |
| Chapter 3 3.3.1.2 | <ul style="list-style-type: none"> With regards to VFR flights planned to operate across international borders, the Union regulation (point SERA.4001(b)(5)) differs from the ICAO Standard in Annex 2, 3.3.1.2(e) with the addition of the underlined text, as follows: 'any flight across international borders, unless otherwise prescribed by the States concerned.' With regard to VFR and IFR flights planned to operate at night, the following requirement is added to point SERA.4001(b)(6) of that Union regulation: '(6) any flight planned to operate at night, if leaving the vicinity of an aerodrome' | ICAO Annex 2, 3.3.1.2 is replaced with Implementing Regulation (EU) No 923/2012 SERA.4001(b). |
| Chapter 3 3.8 and Appendix 2 | | The words 'in distress' of Chapter 3 Part 3.8, are not included in Union law, thus enlarging the scope of escort missions to any type of flight requesting such service. Furthermore the provisions contained in Appendix 2 Parts 1.1 to 1.3 inclusive as well as those found in Attachment A, are not contained in Union law. |

ANNEX 2- Rules Of The Air - Tenth Edition

| Reference | Difference | Remarks |
|------------------|--|--|
| Chapter 4 4.6 | <p>'(f) Except when necessary for take-off or landing, or except by permission from the competent authority, a VFR light shall not be flown:</p> <ol style="list-style-type: none"> 1. over the congested areas of cities, towns or settlements or over an open-air assembly of persons at a height less than 300 m (1000 ft) above the highest obstacle within a radius of 600 m from the aircraft; 2. elsewhere than as specified in (1), at a height less than 150 m (500 ft) above the ground or water, or 150 m (500 ft) <u>above the highest obstacle within a radius of 150 m (500 ft) from the aircraft.</u> | ICAO Annex 2, 4.6, is replaced with Implementing Regulation (EU) No 923/2012 SERA.5005, introducing the obstacle clearance criteria in (f), as outlined. |

ANNEX 3 - Meteorological Service For International Air Navigation - Twentieth Edition

| Reference | Difference | Remarks |
|--------------------------------|--|--|
| PART I Chapter 4 4.1.5 | Ireland does not use automated equipment to measure visibility or integrated systems for real-time display of meteorological parameters | |
| PART 1 Chapter 4 4.2.4.4 | Prevailing visibility not implemented in Ireland. Minimum visibility reported in METAR. | Inability of some operational systems to process prevailing visibility. Implementation planned in November 2018. |
| PART I Chapter 4 4.6.5.1 | Reporting of clouds is not limited to those of operational significance | |
| Chapter 5 | (b) competent authorities shall prescribe as necessary other conditions which shall be reported by all aircraft when encountered or observed | New Provision. Implementing Regulation (EU) No 923/2012, paragraph SERA. 12005. |

ANNEX 4 - Aeronautical Charts - Tenth Edition

| Reference | Difference | Remarks |
|--|---|--|
| Chapter 1 1.1 Air Defence Identification Zone (ADIZ) | DEFINITIONS, APPLICABILITY AND AVAILABILITY ADIZ does not exist in Ireland | |
| Chapter 1 1.2.2.1 | We do not produce several charts in Ireland. For those charts and where we have published a difference, we do not conform to the recommended practices. | |
| Chapter 2 2.1.8 | GENERAL SPECIFICATIONS Sheet size is A4 297mm x 210mm. | Ireland published charts are on a A4 sheet size 297mm x 210mm for inclusion in the integrated Irish AIP document. |
| Chapter 7 7.7 | ENROUTE CHART – ICAO Isogonals are not shown. | There is no operational or industry requirements for this information on this chart. |
| Chapter 7 7.9.3.1.1 | <ol style="list-style-type: none"> 1) Frequencies and coordinates are not shown. 2) Elevation of DME is not shown. 4) The RNP value is not shown. 5) Coordinates are not shown. 6) Frequency is not shown. 8) The distance is given to a tenth of a nautical mile. 10) Minimum En-route altitude is not shown. 11) Communication facilities are not shown. 12) Air defence identification zones do not exist in Ireland. | Due to the complexity of the chart this information would cause too much clutter and should be read in conjunction with the AIP pages ENR 3.1, ENR 3.2 and ENR 4.1 |

ANNEX 4 - Aeronautical Charts - Tenth Edition

| Reference | Difference | Remarks |
|-------------------------|--|---|
| Chapter 8 8.1 | Area Chart-ICAO The Area Chart-ICAO is not produced in Ireland. | Requirements are fulfilled by other means-SID, STAR, Approach, and En-Route charts. |
| Chapter 11 11.4 | INSTRUMENT APPROACHCHART - ICAO Sheet size is A4 297mm x 210mm. | Ireland published charts are on a A4 sheet size 297 mm x 210 mm for inclusion in the integrated Irish AIP document. |
| Chapter 11 11.10.7 | Ireland only publishes OCA/H minimums. We do not publish visibility, MDA, DH, DA, MDA/H or DA/H for instrument approaches at aerodromes. | |
| Chapter 12 12.4 | VISUAL APPROACH CHART - ICAO Sheet size is A4 297mm x 210mm. | Ireland published charts are on a A4 sheet size 297mm x 210mm for inclusion in the integrated Irish AIP document |
| Chapter 13 13.6.1.i) | Geographical coordinates are not published for taxiway centre lines. | |
| Chapter 13 13.6.1.j) | Standard routes are not established. | |
| Chapter 14 14.1 | Aerodrome Ground Movement Chart-ICAO The Aerodrome Ground Movement Chart-ICAO is not produced in Ireland. | Requirements are fulfilled by other means- Aerodrome and Aircraft Parking/Docking Charts |
| Chapter 15 15.6.f) | Geographical coordinates are not published for taxiway centre lines. | |
| Chapter 16 16.1 | World Aeronautical Chart-ICAO 1:1,000,000 The World Aeronautical Chart-ICAO 1:1,000,000 is not produced in Ireland. | Requirements are fulfilled by other means- 1:500,000, 1:250,000 and En-Route charts |
| Chapter 17 17.9.2.2 | AERONAUTICAL CHART - ICAO 1:500 000 Not all this information is displayed on the chart due to clutter. | |
| Chapter 17 17.9.5.2 | ADIZ does not exist in Ireland | |
| Chapter 18 18.1 | Aeronautical Navigation Chart-ICAO Small Scale The Aeronautical Navigation Chart-ICAP Small Scale is not produced in Ireland. | There is no operational or industry requirements for this chart. |
| Chapter 19 19.1 | Plotting Chart –ICAO The Plotting Chart –ICAO is not produced in Ireland. | There is no operational or industry requirements for this chart. |
| Chapter 20 20.1 | Electronic Aeronautical Chart Display-ICAO The Electronic Aeronautical Chart Display-ICAO is currently not produced in Ireland. | |

ANNEX 5 - Units Of Measurement To Be Used In Air And Ground Operations - Fourth Edition Nil

| Reference | Difference | Remarks |
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ANNEX 6 Part I - Operation Of Aircraft - Ninth Edition

| Reference | Difference | Remarks |
|--------------------|--|------------------------|
| Chapter 3 3.3.4 | Annex IV Reg (EU) 965/2012 CAT GEN MPA 195 refers only to FDR, CVR and data link recordings. ICAO Standard specifically lists CVR, CARS, Class A AIR and Class A AIRS. | Different in Character |
| Chapter 3 3.3.5 | Annex IV Reg. (EU) 965/2012 CAT. GEN. MPA. 195 refers to CVR and FDR. ICAO Standard specifically lists FDR, ADRS, Class B and Class C AIR and AIRS. | Different in Character |

ANNEX 6 Part I - Operation Of Aircraft - Ninth Edition

| Reference | Difference | Remarks |
|------------------------|--|--------------------------------|
| Chapter 3 3.5.1 | Annex IV Reg. (EU) 965/2012 CAT.GEN.MPA.205 requires ATS involvement where ATS coverage is provided. ICAO Standards specifies operator only. Regulatory requirement by 16 DEC 2018 | Different in Character |
| Chapter 3 3.5.3 | Annex IV Reg. (EU) 965/2012 CAT.GEN.MPA.205 does not specify 15min requirement. EASA will make automated reporting at least every 15 minutes a requirement by 16 Dec 2018. | Partially Implemented |
| Chapter 3 3.5.4 | Annex IV Reg. (EU) 965/2012 CAT.GEN.MPA.205 is different in its wording. EASA Regulatory requirement by 16th Dec 2018. | Different in Character |
| Chapter 4 4.2.8.1.1 | Annex IV Reg. (EU) 965/2012 Automatic Landing systems, HUD, SVS and CVS not addressed. Will be transposed with RMT.0379 | Pending EU Implementing Rules. |
| Chapter 4 4.2.8.3 | Annex IV Reg. (EU) 965/2012 SPA.LVO.110 and SPA.LVO.110(a) The European Regulation does not yet classify approach operations by Type A and B. RMT0379 (AWO) is envisaged to update the approach classification. Annex IV Reg. (EU) 965/2015 as amended makes no changes to the regulation so the difference will stand. The European Regulation does not yet classify approach operations by Type A and B. RMT 0379 (AWO) is envisaged to update the approach classification. Annex IV Reg. (EU) 965/2012 Annex I Definitions CAT IIIA: DH lower than 100ft and RVR not less than 200m. CAT IIIB: DH lower than 100ft or no DH and RVR lower than 200m but not less than 75m. | More Exacting |
| | Annex IV Reg. (EU) 965/2012 Annex I Definitions CAT IIIA: DH lower than 100ft and RVR not less than 200m. CAT IIIB: DH lower than 100ft or no DH and RVR lower than 200m but not less than 75m. CAT IIIA and CAT IIIB type approaches are not listed in ICAO Definitions. | Different in Character |
| Chapter 4 4.3.4.1.3 | Annex IV Reg. (EU) 965/2012 CAT.OP.MPA.185(a) and CAT.OP.MPA.107 require a period commencing one hour before and ending one hour after the estimated time of arrival at the aerodrome. ICAO Standard 4.3.4.1.3 specifies 'at the estimated time of use'. ICAO Standard 4.3.4.1.2 does break down time requirements. | More Exacting |
| Chapter 4 4.3.4.3.1 | Annex IV Reg. (EU) 965/2012 CAT.OP.MPA.180(b) AMC1 CAT.OP.MPA150(b), Point (d) CAT.OP.MPA.246(b) Reg. (EC) 216/2008 Annex IV 2.a.7 European rules require a period commencing one hour before and ending one hour after the estimated time of arrival at the aerodrome. | More Exacting |

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| Reference | Difference | Remarks |
|---|---|---|
| Chapter 4 4.3.6.2 | Annex IV Reg. (EU) 965/2012 CAT.OP.MPA.150(b) Part-CAT does not require the effect of deferred maintenance items. | Different in Character |
| Chapter 4 4.3.6.7 | Annex IV Reg. (EU) 965/2012 The use of contingency fuel needs clarification. In-flight fuel management needs further amendment. Will be transposed with RMT.0573 | Pending EU Implementing Rules. |
| Chapter 4 4.3.7.2.2 | Annex IV Reg. (EU)965/2012 CAT.OP.MPA.280 The phraseology is addressed in a SIB. The SARPS will be transposed through RMT.0573. European rules require to declare PAN, PAN, PAN. | Pending EU Implementing Rules |
| Chapter 4 4.4.2.1 | Annex IV Reg. (EU) 965/2012 This requirement not specified | Not Implemented |
| Chapter 4 4.4.11 | Annex IV Reg. (EU) 965/2012 CAT.OP.MPA.300 EASA regulation does not specify a height for this requirement. | Different in Character |
| Chapter 4 4.6.1 | Annex IV Reg. (EU) 965/2012 ORO.GEN.110(c) GM1 ORO.GEN.110(c) The European rules do not require a flight operations officer. ORO.GEN.110(c) does not imply a requirement for licensed flight dispatchers or a full flight watch system. If the operator employs flight operations officers in conjunction with a method of operational control, training for these personnel should be based on relevant parts of ICAO Doc 7192 Training Manual, Part D-3, This training should be described in the operations manual. | Partially Implemented |
| Chapter 5 5.2.10 | Annex IV Reg.(EU) 965/2012 CAT.POL.A.220 Provides stricter and more detailed requirements | More Exacting |
| Chapter 5 5.4.1 | Annex IV Reg. (EU) 965/2012 CAT.POL.A.300 SE IMC/night currently not allowed in Part-CAT To be implemented with RMT.0232/233 | Pending EU Implementing Rules |
| Chapter 5 5.4.2 | Annex IV Reg. (EU) 965/2012 CAT.POL.A.300 "An operator shall not operate a single-engine aeroplane at: night; or in instrument meteorological conditions except under special visual flight rules." | SE IMC/night currently not allowed in Part-CAT |
| Chapter 6 6.1.1 | Annex IV Reg. (EU) 965/2012 CAT.IDE.A.100(a) Different in character or other means of compliance | Part-CAT refers to Reg (EU) 748/2012 for approval of equipment and its installation |
| Chapter 6 6.2.2 a) Recommendation 2 | The use of a Universal Precaution Kit is not covered in Reg (EU) 965/2012 | Universal Precaution kit will be dealt with in the RMT.0383 |

ANNEX 6 Part I - Operation Of Aircraft - Ninth Edition

| Reference | Difference | Remarks |
|---|---|--|
| Chapter 6 6.2.2 a) Recommendation 3 | CAT.IDE.A.225 requires the emergency medical kit for aeroplanes with a maximum approved passenger seating configuration of more than 30 seats if any point on the planned route is more than 60 minutes flying time (at normal cruising speed) from an aerodrome at which qualified medical assistance could be expected. | More exacting requirement |
| Chapter 6 6.3 | AMC1 CAT.IDE.A.190 for 6.3.1.1: CAT.IDE.A.190(b)(3) &(b)(5), Reg (EU) 965/2012 There is no definition for crash-protected flight recorder or lightweight flight recorder Airborne image recorders and lightweight flight recorder are not required. For installation requirement, refer to applicable certification specifications (CS 25.1457 for CVR and CS25.1459 for FDR) For equipment design requirements, refer to applicable ETSOs (C123 for CVR, C124 for FDR, C176 for AIR, C177 for DLR, 2C197 for ADRS and CARS) Will be transposed with RMT.0400/0401 (by ED Decision) and RMT.0271) | Pending EU Implementing Rules |
| Chapter 6 6.3.1.2.1 | CAT.IDE.A.190(a) (3) & (b)(5) Reg. (EU)965/2012 CAT.IDE.A.190 (a) (3) applies to multi-engine turbine-powered aeroplanes with an MCTOM of 5700kg or less, ICAO requires for all turbine-engine. CAT.IDE.A.190 (b)(5) is applicable to aeroplanes delivered an individual CofA on or after 1 January 2016. There is no alternative offered to the FDR in CAT.IDE.A.190. However, it is in the scope of RMT.0271 | Pending EU Implementing Rules |
| Chapter 6 6.3.1.2.2 | CAT.IDE.A.190(a) (3) applies to multi-engine turbine-powered aeroplanes with an MCTOM of 5700kg or less, with an MOPSC of more than 9 and first issued with a CofA on or after 1 April 1998. Will be addressed by RMT.0271 | Pending EU Implementing Rules |
| Chapter 6 6.3.1.2.3 | CAT.IDE.A.190(a)(1), (a)(2) and (b)(3) of Reg (EU)965/2012 CAT.IDE.A.190(a)(1) and (a)(2) applies to aeroplanes with an individual CofA issued on or after 1 June 1990. CAT.IDE.A.190 (b)(3) identifies the FDR Type 1 requirement for aeroplanes referred to in CAT.IDE.A.190(a)(1) and (a)(2) with an MCTOM of over 27000kg and first issued with an individual CofA before 1 Jan 2016. | EU Reg CAT.IDE.A.190 is more specific with respect to applicability |
| Chapter 6 6.3.1.2.4 | CAT.IDE.A.190(a)(1) and (b)(2) Reg (EU)965/2012 CAT.IDE.A.190(a)(1) applies to aeroplanes with a MCTOM of more than 5700kg with an individual CofA on or after 1 June 1990. CAT.IDE.A.190 (b)(2) applies to aeroplanes referred to in (a)(1) with an MCTOM of less than 27000kg and first issued with an individual CofA before 1 Jan 2016. | EU Reg CAT.IDE.A.190 is more specific, however difference in earlier qualification date. |
| Chapter 6 6.3.1.2.5 | CAT.IDE.A.190(a)(3) and (b)(4) Reg (EU)965/2012 CAT.IDE.A.190 (a)(3) applies to aeroplanes with an individual CofA after 1 April 1998. Will be addressed by RMT.0338. | Pending EU Implementing Rules |

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| Reference | Difference | Remarks |
|-------------------------|---|--|
| Chapter 6 6.3.1.2.6 | CAT.IDE.A.190(a)(2) &(b)(1) Reg EU 965/2012. CAT.IDE.A.190(a)(2) applies to aeroplanes delivered an individual CofA before 1 June 1990 | Difference in qualification dates |
| Chapter 6 6.3.1.2.7 | AMC6 CAT.IDE.A.190(a)(1) & (a)(2)&(a)(3) applies to aeroplanes delivered an individual CofA before 1 June 1990 | Difference in qualification dates |
| Chapter 6 6.3.1.2.8 | CAT.IDE.A.190(a)(2) & (b)(3) Reg (EU) 965/2012 CAT.IDE.A.190(a)(2) applies to turbine-engined aeroplanes delivered an individual CofA before 1 June 1990 | Difference in qualification dates |
| Chapter 6 6.3.1.2.9 | CAT.IDE.A.190(a)(2) and (b)(1) Reg (EU) 965/2012 CAT.IDE.A.190(a)(2) applies to turbine-engined aeroplanes delivered an individual CofA before 1 June 1990 | Difference in qualification dates |
| Chapter 6 6.3.1.2.11 | CAT.IDE.A.190(a)(1) and (b)(5) Reg (EU) 965/2012. AMC1 CAT.IDE.A.190(b) The flight parameters of Type IA should be recorded only for aeroplanes first issued with an individual CofA on or after 1 January 2016 | Type IA differ from type I by the list of parameters to record. The list of parameters are given in the AMC to CAT.IDE.A.190 |
| Chapter 6 6.3.1.2.12 | CAT.IDE.A.190 Reg (EU) 965/2012. AMC 1 CAT.IDE.A.190(c) AMC 1 CAT.IDE.A.190(c) states that 'The parameters to be recorded should meet the performance specifications (range, sampling intervals, accuracy limits and resolution in read-out) as defined in the relevant tables of EUROCAE Document ED-112, including amendments n°1 and n°2, or any later equivalent standard produced by EUROCAE.' and the table of flight parameter performance in ED-112 is only specifying a maximum recording interval of 0.125 seconds for acceleration parameters. | Difference in FDR recording interval parameters |
| Chapter 6 6.3.1.2.13 | CAT.IDE.A.190 Reg (EU) 965/2012 AMC 1 CAT.IDE.A.190(c) states that 'The parameters to be recorded should meet the performance specifications (range, sampling intervals, accuracy limits and resolution in read-out) as defined in the relevant tables of EUROCAE Document ED-112, including amendments n°1 and n°2, or any later equivalent standard produced by EUROCAE.' and the table of flight parameter performance in ED-112 is only specifying a maximum recording interval of 0.125 seconds for acceleration parameters | Difference in FDR recording interval parameters |
| Chapter 6 6.3.1.2.13 | CAT.IDE.A.190(a)(3) and (b) Reg (EU)965/2012 The minimum recording duration for the FDR is 25 hours or 10 hours | Exceeds ICAO Standards |
| Chapter 6 6.3.2 | AMC1 CAT.IDE.A.185. For 6.3.2.1: CAT.IDE.A.185 (a) Reg. (EU)965/2012 CVR for light aircraft not implemented. To be developed under RMT.0271 | Pending EU Implementing Rules |
| Chapter 6 6.3.2.1.2 | CVR for light aircraft not implemented. To be developed under RMT.0271 | Pending EU Implementing Rules |

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| Reference | Difference | Remarks |
|------------------------|--|---|
| Chapter 6 6.3.2.1.3 | AT.IDE.A.185 (a) (1) and (b) (1) Reg (EU) 965/2012. Minimum CVR duration is 2 hours when the individual CofA was first issued on or after 01 April 1998 | Exceeds ICAO Standard |
| Chapter 6 6.3.2.1.4 | CAT.IDE.A.185 (a) (1) Reg (EU) 965/2012 CAT.IDE.A.185(a)(1) applies to all aeroplanes with a MCTOM exceeding 5 700 kg whatever the date of delivery of the individual CofA | Exceeds ICAO Standard |
| Chapter 6 6.3.2.1.5 | CAT.IDE.A.185 (a) (1) Reg (EU) 965/2012 CAT.IDE.A.185(a) (1) applies to all aeroplanes with a MCTOM exceeding 5 700 kg whatever the date of delivery of the individual CofA | Exceeds ICAO Standard |
| Chapter 6 6.3.2.1.6 | CAT.IDE.A.185 (a) (1) Reg (EU) 965/2012 CAT.IDE.A.185 (a) (1) applies to all aeroplanes with a MCTOM exceeding 5 700 kg, be they turbine-engined or not. | Exceeds ICAO Standard |
| Chapter 6 6.3.2.2.1 | CAT.IDE.A.185 (d) Reg (EU) 965/2012 By 1 January 2019 at the latest, the CVR shall record on means other than magnetic tape or magnetic wire. | Later Implementation date |
| Chapter 6 6.3.2.2.2 | CAT.IDE.A.185 Reg (EU) 965/2012 By 1 January 2019 at the latest, the CVR shall record on means other than magnetic tape or magnetic wire. | Later Implementation date |
| Chapter 6 6.3.2.3.1 | CAT.IDE.A.185 (b) Reg (EU) 965/2012 For aeroplanes with an MCTOM of over 5 700 kg and first issued with an individual CofA on or after 01April 1998, the minimum recording duration of the CVR is 2 hours | Exceeds ICAO Standard |
| Chapter 6 6.3.2.3.2 | CAT.IDE.A.185 (b) & (c) Reg (EU) 965/2012 EU Regulation is more specific in terms of applicability dates until 1 January 2019. By 1 January 2019 at the latest, the CVR shall be capable of retaining the data recorded during at least: (1) the preceding 25 hours for aeroplanes with an MCTOM of more than 27 000 kg and first issued with an individual CofA on or after 1 January 2021; or (2) the preceding 2 hours in all other cases. | Difference in applicability dates until 1 January 2019. |
| Chapter 6 6.3.2.3.3 | CAT.IDE.A.185(b) Reg (EU) 965/2012 For aeroplanes with an MCTOM of over 5 700 kg and first issued with an individual CofA on or after 01 April 1998, the minimum recording duration of the CVR is 2 hours. | Difference in applicability date |
| Chapter 6 6.3.2.3.4 | CAT.IDE.A.185 (c) By 1 January 2019 at the latest, the CVR shall be capable of retaining the data recorded during at least: (1) the preceding 25 hours for aeroplanes with an MCTOM of more than 27 000 kg and first issued with an individual CofA on or after 1 January 2021; or (2) the preceding 2 hours in all other cases. | Exceeds ICAO Standard |
| Chapter 6 6.3.2.4.1 | CAT.IDE.A.185 Not implemented. To be developed under RMT.0249 | Pending EU Implementing Rules |

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| Reference | Difference | Remarks |
|------------------------|--|--|
| Chapter 6 6.3.2.4.2 | CAT.IDE.A.185 Not implemented. To be developed under RMT.0249 | Pending EU Implementing Rules |
| Chapter 6 6.3.2.4.3 | CAT.IDE.A.185 Not implemented. To be developed under RMT.0249 | Pending EU Implementing Rules |
| Chapter 6 6.3.3.1.1 | CAT.IDE.A.195 (a) requires recording data link communications for aeroplanes issued with an individual CofA on or after 08 April 2014. | Difference in applicability date |
| Chapter 6 6.3.3.1.2 | CAT.IDE.A.195 Reg (EU) 965/2012 EU Regulation applicability date is for Aeroplanes first issued with an individual CofA on or after 8 April 2014. The EU Regulation does not reference modifications. | Different in character and compliance. |
| Chapter 6 6.3.4.4 | CAT.GEN.MPA.195(d) Reg (EU) 965/2012 CAT.IDE.A.190 Reg (EU) 965/2012 It is inferred that the FDR documentation is in electronic format | Different in character |
| Chapter 6 6.3.4.5.1 | CAT.IDE.A.200 Reg (EU) 965/2012 The carriage of two combination recorders is an alternative to carrying single-function flight recorder | Different in character |
| Chapter 6 6.3.4.5.2 | CAT.IDE.A.200 Reg (EU) 965/2012 Compliance with CVR and FDR requirements may be achieved by two flight data and cockpit voice combination recorders in the case of aeroplanes with an MCTOM of more than 5 700 kg and required to be equipped with a CVR and an FDR. AMC1 states When two flight data and cockpit voice combination recorders are installed, one should be located near the flight crew compartment, in order to minimise the risk of data loss due to a failure of the wiring that gathers data to the recorder. The other should be located at the rear section of the aeroplane, in order to minimise the risk of data loss due to recorder damage in the case of a crash. | Different in applicability weight. |
| Chapter 6 6.4.1 | CAT.IDE.A.125 Reg (EU) 965/2012 Part-CAT requires additional instruments | Exceeds ICAO Standard |
| Chapter 6 6.5.3.1 | CAT.IDE.A.285 (f) Reg (EU) 965/2012 EU Regulation requires Underwater Locating Beacon (ULB) or Device (ULD) mandatory by 1 January 2019 | Difference in Implementation Date |
| Chapter 6 6.10 | CAT.IDE.A.130 CAT.IDE.A.115 Reg (EU) 965/2012 CAT.IDE.A.115 requires portable lights also during daylight flights which exceeds ICAO SARPS which requires it only for night flights. | Exceeds ICAO Standard |
| Chapter 6 6.12 | Council directive 96/29 EURATOM Art 42 Protection to air crew. The Basic Regulation only addresses the mitigation of safety risks and does not provide the legal basis for transposing this standard to avoid overlaps with other Community Legislation, (Council Directive 96/29/Euratom of 13 May 1996). | Dealt under EU Council Directive |

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| Reference | Difference | Remarks |
|-----------------------|--|--|
| Chapter 6 6.18.2 | CAT.GEN.MPA.210 Transmission of information from which a position can be determined is not specified as 'once every minute' when in distress. | Different in character or other means of compliance. |
| Chapter 6 6.20.2 | CAT.IDE.A.350 Reg (EU) 965/2012 Resolution of 7.62 m for the pressure altitude reporting transponder not specified. | Different in character or other means of compliance. |
| Chapter 6 6.20.3 | CAT.IDE.A.350 Reg (EU) 965/2012 Resolution of 7.62 m for the pressure altitude reporting transponder not specified. | Different in character or other means of compliance. |
| Chapter 6 6.20.4 | CAT.IDE.A.350 Reg (EU) 965/2012 Resolution of 7.62 m for the pressure altitude reporting transponder not specified. | Different in character or other means of compliance. |
| Chapter 6 6.22.1 | Not implemented. Work in progress with RMT.0369/370 | Pending EU Implementing Rules |
| Chapter 6 6.22.2 | Not implemented. Work in progress with RMT.0369/370 | Pending EU Implementing Rules |
| Chapter 6 6.24.2 | (EU) 965/2012 Provisions as regards criteria for the approval of operational credits for automatic landing systems, HUD, SVS and CVS are not available. Will be transposed with RMT.0379 | Pending EU Implementing Rules |
| Chapter 6 6.24.2 | (EU) 965/2012 AMC 20-25 Requirements related to the use of EFB and operational approval for the use of some functions not available. Will be transposed with RMT.0601 | Pending EU Implementing Rules |
| Chapter 6 6.25.1 | (EU) 965/2012 AMC 20-25 Requirements related to the use of EFB and operational approval for the use of some functions not available. Will be transposed with RMT.0601 | Pending EU Implementing Rules |
| Chapter 6 6.25.2.1 | (EU) 965/2012 AMC 20-25 Requirements related to the use of EFB and operational approval for the use of some functions not available. Will be transposed with RMT.0601 | Pending EU Implementing Rules |
| Chapter 6 6.25.2.2 | (EU) 965/2012 AMC 20-25 Requirements related to the use of EFB and operational approval for the use of some functions not available. Will be transposed with RMT.0601 | Pending EU Implementing Rules |
| Chapter 6 6.25.3 | (EU) 965/2012 AMC 20-25 Requirements related to the use of EFB and operational approval for the use of some functions not available. Will be transposed with RMT.0601 | Pending EU Implementing Rules |
| Chapter 7 7.1.4 | Certification Specifications - ACNS issue 17 Dec 2013 EU Implementing Rules currently do not address this area in the context of flight crews | Pending EU Implementing Rules |
| Chapter 7 7.1.5 | EU Implementing Rules currently do not address this area in the same context | Pending EU Implementing Rules |

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| Reference | Difference | Remarks |
|----------------------|---|--|
| Chapter 7 7.3.2 | Annex I to ED Decision 2013/031/R, Certification Specifications - Airborne Communications, Navigation and Surveillance, 17 Dec 2013 EU Rules do not currently address. | Pending EU Implementing Rules. |
| Chapter 7 7.3.3 | Annex I to ED Decision 2013/031/R, Certification Specifications - Airborne Communications, Navigation and Surveillance, 17 Dec 2013 EU Implementing Rules do not currently address. | Pending EU Implementing Rules. |
| Chapter 7 7.3.4 | Annex I to ED Decision 2013/031/R, Certification Specifications - Airborne Communications, Navigation and Surveillance, 17 Dec 2013 EU Implementing Rules do not currently address. | Pending EU Implementing Rules. |
| Chapter 8 8.3.2 | Regulation (EC) 2042/2003, Part M does not require that copies of all amendments to the maintenance programme be furnished promptly to all organizations or persons to whom the maintenance programme has been issued. | Not regulated but done in practice and put in the contract between AOC Holders and maintenance organisations |
| Chapter 8 8.4.2 | EC 2042/2003 Annex I Part M, Subpart C M.A.305(h)(1-6) require certain records are kept for up to 24 months | More exacting requirement |
| Chapter 8 8.7.2.1 | Regulation (EC) 2042/2003, Part 145, 145A.70, AMC provides for additional information that must be listed in the maintenance organisation exposition | More exacting requirement |
| Chapter 8 8.7.2.3 | Regulation (EC) 2042/2003, Part 145 does not explicitly require that copies of all amendments to the procedures manual be furnished promptly to all organizations or persons to whom the manual has been issued. This issue is dealt with under the Part 145 Quality System requirements. | Not regulated but common practice due to the requirement for a quality system |
| Chapter 8 8.7.3.2 | Regulation (EC) Part 145, 145A.65 requires a safety policy to be established for maintenance organisations. The State Safety Programme is currently being implemented in Ireland and will establish acceptable levels of safety for maintenance by 2012. | Less Restrictive |
| Chapter 8 8.7.3.3 | ORO.GEN.200 of Reg (EU) 965/2012 Existing Irish regulation mandates SMS, however, EU regulation is pending that will update the requirements established by the IAA in the Aeronautical Notices. | Pending further EU Implementation rules |
| Chapter 8 8.7.7.2 | EASA requires records to be retained for two years. | More exacting requirement |
| Chapter 9 9.1.2 | FCL.055 of EU Reg 1178/2011 Licencing Requirement for English Language Proficiency for radio telephony in all phases of flight. Specific Radio Operators licences requirements were deleted in SI 333/2000. | Different in character. |
| Chapter 9 9.1.3 | ORO.FC.110 Reg (EU) 965/2012 and Article 7 of EU Reg 1178/2011 Flight Engineer Licences are administered under National Rules SI 333/2000 | Different in character. |
| Chapter 9 9.1.4 | Requirement deleted in SI 333/2000 Flight Navigator Licensing requirement repealed in SI 333/2000. | Not Applicable. |

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| Reference | Difference | Remarks |
|----------------------|---|---------------------------|
| Chapter 9 9.2 | Reg (EC) 216/2008 1.(b) & (c) ORO.FC.130(a),(b) ORO.FC.230(d) AMC1.ORO.FC.230(a)&(b) ORO.GEN.110(e),(f),(h) Reg (EU) 965/2012 AMC1.ORO.FC.220(b)&(d) ICAO Annex 6, chapter 9.2 establishes provisions for each type of aeroplane. ORO.FC.130(a) for each type and variant. ORO.GEN.110(h) requires also the use of a checklist. ICAO Annex 6 9.2 does not require it. | More exacting requirement |
| Chapter 9 9.4.3.3 | Reg (EU) 216/2008(2) ORO.FC.105(b.2)&(c) Reg (EU) 965/2012 AMC1 ORO.FC.105(b)(2);(c) [(a),(b)&(c)] AMC2.ORO.FC.105(c) [(a)&(b)] European rules have implemented a categorisation of aerodromes (A, B, C and/or demanding/not demanding). Rules achieve same safety level even though the classification is slightly different. | Different in character. |
| Chapter 9 9.4.4.1 | AMC1.ORO.FC.240 [(a)] AMC1.ORO.FC.230 [(a)&(b)] ORO.FC.230(b) ORO.FC.145(a)&(c) Reg (EU) 965/2012 The rule allows ATQP as an alternative to the prescriptive training requirements. Even though checking intervals can be extended, the same or even higher level needs to be achieved. For operations under VFR by day of performance class B aeroplanes conducted during seasons not longer than 8 consecutive months one OPC is sufficient. | Different in character. |
| Chapter 10 10.1 | ORO.GEN.110 Reg. (EU) 965/2012 No requirement for flight operations officer/flight dispatchers to be licensed. | Not Applicable. |
| Chapter 10 10.2 | ORO.GEN.110 Reg (EU) 965/2012 Guidance Material for the above Reg states that; If the operator employs flight operations officers in conjunction with a method of operational control, training for these personnel should be based on relevant parts of ICAO Doc 7192 Training Manual, Part D-3. This training should be described in the operations manual. | Different in character. |
| Chapter 10 10.3 | ORO.GEN.110 Reg (EU) 965/2012 Guidance Material for the above Reg states that; If the operator employs flight operations officers in conjunction with a method of operational control, training for these personnel should be based on relevant parts of ICAO Doc 7192 Training Manual, Part D-3. This training should be described in the operations manual. | Different in character. |
| Chapter 10 10.4 | ORO.GEN.110 Reg (EU) 965/2012 ORO.AOC.135 Reg (EU) 965/2012 Guidance Material for the above Reg states that; If the operator employs flight operations officers in conjunction with a method of operational control, training for these personnel should be based on relevant parts of ICAO Doc 7192 Training Manual, Part D-3. This training should be described in the operations manual. | Different in character. |
| Chapter 10 10.5 | ORO.GEN.110 Reg (EU) 965/2012 The ICAO recommendation is not transposed in the above EU Reg. | Not Implemented. |

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| Reference | Difference | Remarks |
|----------------------|--|-----------------------------------|
| Chapter 11 11.4.3 | ORO.MLR.115 Reg (EU) 965/2012 months storage period required under Reg. 965/ 2012 | Different in means of compliance. |
| Chapter 12 12.4 | CC.TRA.220 CC.TRA.225 Appendix I to Part-CC ORO.CC.110 ORO.CC.115 For HF/CRM: AMC1 ORO.CC.115(e) GM1 ORO.CC.115(e) ORO.CC.120 ORO.CC.125 AMC1 ORO.CC.125(c) AMC1 ORO.CC.125(d) ORO.CC.130 ORO.CC.135 AMC1 ORO.CC.135 ORO.CC.140 AMC1 ORO.CC.140 ORO.CC.145 AMC1 ORO.CC.145 GM1 ORO.CC.145 For DG: ORO.GEN.110(j) CAT.GEN.MPA.200 Reg (EU) 965/2012 In addition to the completion of initial training required by the Air Ops Regulation Reg. (EU) 965/ 2012, the Aircrew Reg. (EU) 1178/2011 also requires the issuing of a cabin crew attestation to each cabin crew member who will be operating in CAT operations. This attestation shall be issued in accordance with the mandatory EASA Form 142 (Appendix II to Part-ARA). This attestation is considered valid as long as the holder acts as cabin crew and completes the other training required by the Air Ops Regulation. If a holder stops operating during more than 5 years, his/her attestation becomes invalid and initial training has to be completed again. | More exacting requirement |
| Chapter 13 13.4.1 | Essential requirements 8d, Reg (EU) 216/2008. Point 10 of Annex 1 Reg (EC) 300/2008 AMC1 ORO.FC.220 AMC1 ORO.FC.230 AMC1 ORO.CC.125(c) & ORO.CC.140 & ORO.CC.124, Reg (EU) 965/2012 for flight crew compartment security training. BR 216/2008 & Reg. 965/2012 only mention generic security training required, but not as detailed as in ICAO. | Different in Character |
| Chapter 13 13.4.2 | AMC1 ORO.FC.220 AMC1 ORO.FC.230 AMC1 ORO.CC.125(c) Regulation (EU) 965/2012 only requires training on flight crew compartment procedures. | Different in Character |
| Chapter 13 13.5 | Essential requirements 8d (v), Reg (EU) 216/2008. AMC3 ORO.MLR.100(a) Part A Chapter 11(e) Art. 4 Reg (EU) 376/2014 Reporting to local authority is not specified. Occurrence Reporting Regulation (EU) 376/2014 foresees reporting on security by pilot within 72hrs to the operator and by operator within 72 hours to the competent authority. | Different in Character |

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| Reference | Difference | Remarks |
|----------------------|--|---------|
| Chapter 2 1.4 | Specific approvals are issued by the Competent Authority of the operator, not necessarily the State of Registry. | |
| Chapter 2 2.4.9.1 | EASA states (a) The PIC shall use the departure and approach procedures established by the State of the aerodrome. | |

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| Reference | Difference | Remarks |
|---|--|---------|
| Chapter 2 4.6.2 | EASA requires this safeguard for all aeroplanes operating at these altitudes. | |
| Chapter 2 4.6.3 Recommendation | EASA requires this safeguard for all aeroplanes operating at these altitudes. | |
| Chapter 2 4.8 | EASA does not require the fitment of an outside temperature gauge. | |
| Chapter 2 4.11.2 Recommendation | EASA has not implemented this recommendation. | |
| Chapter 2 4.16.1.1.1 Recommendation | This recommendation is not addressed by EASA. | |
| Chapter 2 4.16.1.2 | Not implemented into EU rules. | |
| Chapter 2 4.16.2.1 Recommendation | EASA stipulates above 2,250kgs. | |
| Chapter 2 4.16.2.3.2 | The EU has not yet implemented this rule. | |
| Chapter 2 4.18.4 Recommendation | May not use layout of Appendix 2.5, paragraph 2. | |
| Chapter 2 5.1.7 | EASA uses the State of the operator | |
| Chapter 2 5.1.8 | EASA uses the State of the operator | |
| Chapter 2 5.1.9 | EASA uses the State of the operator | |
| Chapter 2 5.2.3 | A PBN approval is issued by the Competent Authority of the operator not necessarily the State of Registry. | |
| Chapter 2 5.2.4 | A PBN approval is issued by the Competent Authority of the operator not necessarily the State of Registry. | |
| Chapter 2 5.2.5 | A PBN approval is issued by the Competent Authority of the operator not necessarily the State of Registry. | |
| Chapter 2 5.3.3 | For aeroplanes registered in the EU, for the non-commercial operator, it is the authority of the State in which the operator has its principal place of business, is established or is residing. | |
| Chapter 2 6.2.2 | (EU) 1321/2014 specifies 12 months for all 6 items (EC) 2042/2003 specifies 12 months for all 6 items. | |
| Chapter 2 8.1 | EASA requires that flight manual updates are approved by EASA | |
| Chapter 3 1.2 Recommendation | EASA states more than 19 passenger seats. | |
| Chapter 3 4.3.5.4 Recommendation | EASA has not implemented this Recommendation. | |
| Chapter 3 6.2.1 | EASA makes no mention of paragraph d. | |

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| Reference | Difference | Remarks |
|--|--|---------|
| Chapter 3 6.3.1.1.1 | EASA states first issued with a C of A after 1 January 2016. | |
| Chapter 3 6.3.1.1.2 | EASA states first issued with a C of A after 1 January 2016 and stipulates over 5,700kgs. | |
| Chapter 3 6.3.1.1.3 Recommendation | EASA states first issued with a C of A after 1 January 2016 and no upper weight limit. | |
| Chapter 3 6.3.2.1.1 | EASA states above 2,250 kg. | |
| Chapter 3 6.3.2.1.2 | EASA states a C of A issued on or after 1st January 2016. | |
| Chapter 3 6.3.2.1.3 Recommendation | EASA states a C of A issued on or after 1st January 2016 and above 2,250kgs with no upper limit. | |
| Chapter 3 6.5.2.1 | EASA stipulates this requirement for all aeroplanes when operating IFR. | |
| Chapter 3 6.8.2.1 Recommendation | EASA only stipulates this requirement for an individual C of A first issued after 31 Dec 1980. | |
| Chapter 3 6.9.1 Recommendation | EASA stipulates all turbine powered aeroplanes in excess of 5,700kgs and in excess of 19 passenger seats. | |
| Chapter 3 6.9.2 | EASA stipulates all turbine powered aeroplanes in excess of 5,700kgs and in excess of 19 passenger seats. | |
| Chapter 3 8.5.2 | Pilot-owner authorisation does not comply with the requirement that a person shall be appropriately licenced i.a.w. Annex 1. | |

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| Reference | Difference | Remarks |
|---|---|--|
| Section II Chapter 2 2.2.8.1.1 | Automatic landing systems includes EVS and HUD but SVS and CVS are not addressed | |
| Section II Chapter 2 2.2.8.3 | EASA: a. does not refer to a visibility for CAT I only an RVR of 500m; b. states a minimum RVR for CAT IIIA of 200m; c. states an RVR for CAT IIIB of between 200m and 75m; d. does not define CAT IIIC | RMT.0379 (AWO) is envisaged to update the approach classification. |
| Section II Chapter 2 2.3.3.1 | EASA does not require the operational flight plan to be lodged with the appropriate Authority but expects the operator to retain a copy on the ground. | |
| Section II Chapter 2 2.3.4.2.3 Recommendation | (EU) 965/2012 AMC1 CAT.OP.MPA.192 requires RVR/VIS + 400 m Ceiling at or above (M)DH + 200 ft for both alternates. | |
| Section II Chapter 2 2.3.4.3.10 Recommendation | This recommendation is not addressed by EASA. | |

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|---|--|---|
| Reference | Difference | Remarks |
| Section II Chapter 2 2.3.4.3.15 Recommendation | This recommendation is not addressed by EASA. | |
| Section II Chapter 2 2.3.6.3.3 | EASA states: "additional fuel to fly for 2 hours at holding speed including final reserve fuel; and extra fuel if there are anticipated delays or specific operational constraints" | |
| Section II Chapter 2 2.3.7.1 | (a).is permitted provided operator has procedures in place in accordance with AMC4, AMC5 & AMC6 to CAT.OP.MPA.200. (b). (EU) 965/2012 does not consider this requirement. | |
| Section II Chapter 2 2.3.7.2 | Requirements a) and c) are not addressed. | |
| Section II Chapter 2 2.3.7.4 Recommendation | f) EASA expects the operator's risk assessment to determine whether seat belts should be fastened or unfastened. g) EASA expects the operator's risk assessment to determine when passengers should disembark/embark. | |
| Section II Chapter 2 2.3.7.6 | a) and b) are permitted, but not for avgas or wide-cut fuel or a mixture of these types of fuel, provided 'For all other types of fuel, the necessary precautions should be taken, and the aircraft should be properly manned by qualified personnel that should be ready to initiate and direct an evacuation of the aircraft by the most practical and expeditious means available.' c) EASA does not consider this requirement. | |
| Section II Chapter 2 2.4.4.4 | EASA makes no mention of "all other flight crew members shall keep their safety harness fastened during the take-off and landing phases unless the shoulder straps interfere with the performance of their duties, in which case the shoulder straps may be unfastened but the seat belt must remain fastened" | |
| Section II Chapter 2 2.5.5 | EASA uses the term "signature of person in charge" instead of "pilot-in-command" | |
| Section II Chapter 2 2.6.1 | EASA does not mandate the use of Flight Operations Officers / Flight Dispatchers | EASA states a. ORO.GEN110(c) does not imply a requirement for licensed flight dispatchers or a full flight watch system. b. if the operator employs flight operations officers in conjunction with a method of operational control, training for these personnel should be based on relevant parts of ICAO Doc 7192 Training Manual, Part D-3. This training should be described in the operations manual |
| Section II Chapter 2 2.8.1 | EASA has not implemented FRMS for helicopters | |
| Section II Chapter 2 2.8.2 | EASA has not implemented FRMS for helicopters | |

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|---|---|---------|
| Reference | Difference | Remarks |
| Section II Chapter 2 2.8.5 | EASA has not implemented FRMS for helicopters | |
| Section II Chapter 4 4.1.5.4 Recommendation | May not use layout of Appendix 7 paragraph 2 | |
| Section II Chapter 4 4.3.1.1.2 | EASA specifies more than 9 passengers. | |
| Section II Chapter 4 4.3.1.1.3 Recommendation | EASA specifies an applicability date of 1 August 1999 | |
| Section II Chapter 4 4.3.1.1.5 Recommendation | Flight data recording equipment is only required for commercial air transport helicopters first issued with an individual C of A after 5 September 2022 with a MCTOM exceeding 2250 kg. | |
| Section II Chapter 4 4.3.1.3 | 1st issue of C of A post 1 January 2016 10 hours retention; 1 August 1999 to 1 January 2016 8 hours retention; 1 January 1989 to 1 August 1999 5 hours retention. | |
| Section II Chapter 4 4.3.2.1.1 | EASA makes no mention of "For helicopters not equipped with an FDR, at least main rotor speed shall be recorded on the CVR." | |
| Section II Chapter 4 4.3.2.1.2 Recommendation | EASA makes no mention of "For helicopters not equipped with an FDR, at least main rotor speed shall be recorded on the CVR." | |
| Section II Chapter 4 4.3.2.3 | EASA stipulates helicopters first issued with an individual C of A prior to 1st January 2016 of 7,000 kg or less shall retain the recorded information for at least 30 minutes. EASA stipulates helicopters first issued with an individual C of A prior between 1st August 1999 and 1st January 2016 of greater than 7,000 kg shall retain the recorded information for at least 1 hour. EASA stipulates helicopters first issued with an individual C of A prior to 1st August 1999 of greater than 7,000 kg shall retain the recorded information for at least 30 minutes. | |
| Section II Chapter 4 4.3.3.1.3 Recommendation | EASA stipulates helicopters first issued with an individual C of A on or after 8th April 2014 | |
| Section II Chapter 4 4.4.4 Recommendation | EASA only requires this forward-looking terrain avoidance function for helicopters involved SPA.HOFO operations. | |
| Section II Chapter 4 4.5.2.6 Recommendation | The AMC is applicable to all helicopters regardless of the date of issuance of the C of A. | |
| Section II Chapter 4 4.5.2.7 Recommendation | EASA only allows raft below 40 kg. | |

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|---|---|---|
| Reference | Difference | Remarks |
| Section II Chapter 4 4.5.3.2 Recommendation | Consideration on sun not included. | |
| Section II Chapter 4 4.10.1 Recommendation | Helicopters with an MOPSC of more than 9 shall be equipped with airborne weather detecting equipment. | |
| Section II Chapter 4 4.15.1 Recommendation | (EU) 2016/1199 SPA.HOFO.155(a) stipulates: The following helicopters conducting CAT offshore operations in a hostile environment shall be fitted with a VHM system capable of monitoring the status of critical rotor and rotor drive systems by 1 January 2019: (1) complex motor-powered helicopters first issued with an individual Certificate of Airworthiness (C of A) after 31 December 2016; (2) all helicopters with a maximum operational passenger seating configuration (MOPSC) of more than 9 and first issued with an individual C of A before 1 January 2017; (3) all helicopters first issued with an individual C of A after 31 December 2018. | |
| Section II Chapter 4 4.17.2.1 | This regulation only applies to Type B EFBs | |
| Section II Chapter 4 4.17.2.2 | This regulation only applies to Type B EFBs | |
| Section II Chapter 5 5.1.3 | EASA does not yet specify requirements for PBC. | Pending EU Implementing Rules |
| Section II Chapter 5 5.1.4 | EASA does not yet specify requirements for PBC. | Pending EU Implementing Rules |
| Section II Chapter 5 5.1.5 | EASA does not yet specify requirements for PBC. | Pending EU Implementing Rules |
| Section II Chapter 6 6.2.1 | EASA requirements do not address the human factors principles. | <ol style="list-style-type: none"> 1. M.A.704 (a) requires to provide the CAME although it is not specified to whom. The AMC requires the personnel to be familiar with the relevant parts of the manual. The manual is approved by the State of Operator, due to mutual recognition is valid for the State of Registry within EASA MS. 2. Non-compliance is only identified in relation to the HF Requirement. |
| Section II Chapter 6 6.2.4 | Non-compliance relates to the requirement to provide the manual to the State of Registry if different for the State of operator. It is currently required to be approved by the State of operator. | Within the EU Member States this requirement is compensated by the mutual recognition. |
| Section II Chapter 6 6.3.2 | (EU) 1321/2014, Part M does not require that copies of all amendments to the maintenance programme be furnished promptly to all organizations or persons to whom the maintenance programme has been issued. | Not regulated but done in practice and put in the contract between AOC Holders and maintenance organisations |

| ANNEX 6 Part III - Operation Of Aircraft - Eleventh Edition | | |
|---|--|---------|
| Reference | Difference | Remarks |
| Section II Chapter 6 6.4.2 | (EU) 1321/2014 Part M specifies more exacting requirements for al 6 items | |
| Section II Chapter 6 6.4.4 | M.A.305(h) requires An owner or operator shall ensure that a system has been established to keep the following records for the periods specified: In AMC M.A.305(h) the details in 8.4.4Same applies to maintenance organisations in 145.A.55(c) | |
| Section II Chapter 6 6.5.1 | EASA does not stipulate a minimum take-off mass. | |
| Section II Chapter 6 6.5.2 | (EU) 1321/2014 Part M does not specify a minimum mass for this requirement. | |
| Section II Chapter 6 6.7.1 | Part-M.A.612 has not specified the details in referenced Chapter. No difference for Part-145. Part-M.A.612 is Less protective or partially implemented or not implemented | |
| Section II Chapter 6 6.8.2 | For a),b(1) it is required to be kept for 12 months after aircraft is permanently withdrawn from service. However for b)(2)(3) and c) Part-M doesn't specify in corresponding provisions how long records should be kept after the aircraft has been withdrawn from service. Nevertheless those records are still required to be kept under the provisions of M.A.305(h)(1) at least 36 months after release to service. | |
| Section II Chapter 7 7.2 | ICAO Annex 6 SARPS 7.2 established provisions for each type of helicopter, ORO.FC.130 (a) Required for each type and variant. | |
| Section II Chapter 9 9.1 | EASA requires that flight manuals shall be updated by implementing changes made mandatory by EASA. | |
| Section II Chapter 9 9.4.3 Recommendation | EASA only requires journey logs to be retained for 3 months. | |
| Section II Chapter 12 12.4.2 | EASA does not specifically address this requirement but refers to 'the transport of dangerous goods by air shall be conducted in accordance with Annex 18 to the Chicago Convention as last amended and amplified by the 'Technical instructions for the safe transport of dangerous goods by air' (ICAO Doc 9284-AN/905), including its supplements and any other addenda or corrigenda.' | |
| Section II Chapter 12 12.4.3.2 | EASA does not specifically address this requirement but states 'The transport of dangerous goods by air shall be conducted in accordance with Annex 18 to the Chicago Convention as last amended and amplified by the Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Doc 9284-AN/905), including its attachments, supplements and any other addenda or corrigenda.' | |

| ANNEX 6 Part III - Operation Of Aircraft - Eleventh Edition | | |
|---|--|--------------------------------|
| Reference | Difference | Remarks |
| Section II Chapter 12 12.4.3.3 | Not implemented by EASA. | |
| Section III Chapter 1 1.4 | Specific approvals are issued by the Competent Authority, of the operator, not necessarily the State of Registry. | |
| Section III Chapter 2 2.6.1 | EASA gives no alleviation for purely local visual flights. | |
| Section III Chapter 2 2.8.4 | d) is not considered | |
| Section III Chapter 2 2.17.1 | EASA states (a) the PIC shall use the departure and approach procedures established by the State of the aerodrome. | |
| Section III Chapter 4 4.3.2.5 Recommendation | EASA considers lift rafts not deployable by remote control should have a maximum mass of 40 kg. | |
| Section III Chapter 4 4.3.2.6 Recommendation | EASA considers lift rafts not deployable by remote control should have a maximum mass of 40 kg. | |
| Section III Chapter 4 4.7.2.1.1 | EASA requires a CVR to be fitted to helicopters over 7000 kg with an individual C of A issued on or after 1 January 2016. | |
| Section III Chapter 4 4.7.2.1.2 Recommendation | EASA has no requirement for the carriage of a CVR for a helicopter of less than 7000 kg. | |
| Section III Chapter 4 4.7.2.2 | Discontinuation of magnetic tape CVR not implemented, however Opinion 01/2014 proposes discontinuation by 01 January 2019. | |
| Section III Chapter 4 4.13.4 Recommendation | May not use layout of Appendix 7 paragraph 2 | |
| Section III Chapter 5 5.1.6 | EASA does not yet specify requirements for PBC | Pending EU implementing rules. |
| Section III Chapter 5 5.1.7 | EASA does not yet specify requirements for PBC. | Pending EU Implementing Rules |
| Section III Chapter 5 5.1.8 | EASA does not yet specify requirements for PBC. | Pending EU Implementing Rules |
| Section III Chapter 5 5.1.9 | EASA does not yet specify requirements for PBC. | Pending EU Implementing Rules |
| Section III Chapter 5 5.2.1 | EASA does not state the distance between landmarks for international general aviation flights. | |

| ANNEX 6 Part III - Operation Of Aircraft - Eleventh Edition | | |
|---|---|---|
| Reference | Difference | Remarks |
| Section III Chapter 5 5.2.3 | A PBN approval is issued by the Competent Authority of the operator not necessarily the State of Registry. | SPA.GEN.100 states: (a) The competent authority for issuing a specific approval shall be: (1) for the commercial operator the authority of the Member State in which the operator has its principal place of business; (2) for the non-commercial operator the authority of the State in which the operator is established or residing. |
| Section III Chapter 5 5.2.4 | The Competent Authority of the operator not necessarily the State of Registry, establishes these requirements are met. | |
| Section III Chapter 5 5.2.5 | A PBN approval is issued by the Competent Authority of the operator not necessarily the State of Registry. | |
| Section III Chapter 5 5.3.3 | For aircraft registered in the EU, for the non-commercial operator, it is the authority of the State in which the operator has its principal place of business, is established or is residing | |
| Section III Chapter 6 6.2.2 | (EU) 1321/2014 Part M specifies in excess of the specified requirements. | |

ANNEX 7 - Aircraft Nationality And Registration Marks - Fifth Edition

| Reference | Difference | Remarks |
|--------------------|---|---|
| Chapter 3 3.2 | Captive balloons, kites, unmanned free balloons without payload and gliders with a maximum structural mass of 80kg or less, are exempt 'Nationality and Registration Marks' requirements. | Consequently all provisions of Annex 7 which refer to the affixing and location of registration marks and identification plate cannot be applied. No centralised register of unmanned free balloons is kept in Ireland. |
| Chapter 3 3.3 | | |
| Chapter 4 4.1.2 | | |
| Chapter 6 | | |
| Chapter 8 | | |

ANNEX 8 - Airworthiness of Aircraft - Tenth Edition

| Reference | Difference | Remarks |
|------------------------------------|---|--|
| PART II Chapter 3 3.6.1 | Assessment also allowed by EASA approved DOA under procedure agreed with Agency | Assessment also allowed by EASA approved DOA under procedure agreed with Agency |
| PART IIIA. Chapter 2 2.2.3 | In the airworthiness codes, scheduling of landing distance with runway slope is not mandated, but factors on landing distance are applied by operational rules, where appropriate. In the airworthiness codes, performance scheduling for variations in water surface conditions, density of water and strength of current is not mandated, but factors on landing distance are applied by operational rules, where appropriate. | CS-23 complies except that performance is not scheduled for variations in water surface conditions, density of water and strength of current. CS 23.237 requires that the allowable water surface conditions and any necessary water handling procedures for seaplanes be established. However, factors on landing distance are applied by operational rules, where appropriate. |
| PART IIIA. Chapter 2 2.3.4.1 | In the airworthiness codes, stall testing with one power unit inoperative is not mandated, but issues with stall warning with one engine inoperative are considered in individual certification activities. | Any issues with stall warning with one engine inoperative would be apparent from the evaluation of the design and during OEI flight testing, especially during evaluation of the manoeuvring margin at V2. This latter test is carried out by EASA with asymmetric power. It is noted that the equivalent requirement has been by Amendment 100 in Part 3B |

ANNEX 8 - Airworthiness of Aircraft - Tenth Edition

| Reference | Difference | Remarks |
|---|--|---|
| PART IIIA. Chapter 4 4.1 | At this time, the airworthiness codes do not specifically require the observing of Human Factors principles but these principles are considered during certification activities for those areas that affect the safety of the aircraft. | NPA 15/2004 relative to Flight Crew Error/Flight Crew Performance Considerations in the Flight Deck Certification Process has been published and CS-25 has been updated in 2007. EASA has included in the rule making inventory a task MDM.035 grouping of various human factor tasks. A plan to take into account human factors into design will be proposed by an Advance NPA that should be circulated during the second quarter of 2008 There is also a JAA interim policy (INT/POL/25/14) for large aeroplanes that has also been used by EASA. |
| PART IIIA. Chapter 4 4.1.6 | At this time, the airworthiness codes do not specifically require protection against explosive and incendiary devices. | Work to address this, based on the output of the Design for Security Harmonization WG should lead to an NPA in 2009 and a modification to CS-25 by end 2009 |
| PART IIIA. Chapter 9 9.2.4 | The airworthiness codes do not specifically address the issue of limitations on equipment and systems but in practice the Standard is complied with. | Paragraph XI524 was deleted from JAR-25 and is not in CS-25. The deletion was done to harmonise with FAR-25 and the rationale was that the paragraph did not added further requirements compared to FAA practice. |
| PART IIIA. Chapter 9 9.3.5 | At this time, the airworthiness codes do not specifically require the identification of the least-risk bomb location. | Work to address this, based on the output of the Design for Security Harmonization WG should lead to an NPA by first quarter of 2009 and a modification to CS-25 by end 2009 |
| PART IIIA. Chapter 11 | At this time, the airworthiness codes do not specifically address this security Standard except for pilot compartment doors. | Work to address this, based on the output of the Design for Security Harmonization WG should lead to an NPA by first quarter of 2009 and a modification to CS-25 by end 2009 |
| PART IIIB. SUB-PART B Chapter B.2.7 | In the airworthiness codes, scheduling of landing distance with runway slope is not mandated, but factors on landing distance are applied by operational rules, where appropriate. In the airworthiness codes, performance scheduling for variations in water surface conditions, density of water and strength of current is not mandated, but factors on landing distance are applied by operational rules, where appropriate | CS-23 complies except that performance is not scheduled for variations in water surface conditions, density of water and strength of current. CS 23.237 requires that the allowable water surface conditions and any necessary water handling procedures for seaplanes be established. However, factors on landing distance are applied by operational rules, where appropriate. |
| PART IIIB. SUB-PART B Chapter B.2.7 b). | The airworthiness codes ensure compliance with this Standard except for accountability for worn brakes in case of commuter category aeroplanes. | The airworthiness codes ensure compliance with this Standard except for accountability for worn brakes in case of commuter category aeroplanes. |
| PART IIIB. SUB-PART B Chapter B.2.7 e). | The airworthiness codes ensure compliance with this Standard except for accountability for worn brakes in case of commuter category aeroplanes. | |

ANNEX 8 - Airworthiness of Aircraft - Tenth Edition

| Reference | Difference | Remarks |
|---|--|---|
| PART IIIB. SUB-PART C Chapter C.7 a). | In general the consideration of likely impact with birds is not mandated in the airworthiness codes for small aeroplanes and commuter category aeroplanes except for bird impact on windshield for Commuter category. Consideration of the probable behaviour of the aeroplane in ditching is only required for type certification where ditching certification is required by operating rules. | CS-23 Jet requirements are under development by EASA that may remove both the bird impact and ditching difference for applicable CS-23 Jet types. Note that the current CS 25.807(e) requires provision of ditching emergency exits for passengers whether or not certification with ditching provisions is requested. |
| PART IIIB. SUB-PART C Chapter C.7 c). | In general the consideration of likely impact with birds is not mandated in the airworthiness codes for small aeroplanes and commuter category aeroplanes except for bird impact on windshield for Commuter category. Consideration of the probable behaviour of the aeroplane in ditching is only required for type certification where ditching certification is required by operating rules. | |
| PART IIIB. SUB-PART D Chapter D.1.3 | The last sentence “the effect on the occupant of the aeroplane and other persons on the ground, and the environment in general, in normal and emergency situations, shall be taken into account” is covered by certification for occupants of the aeroplane. (crash survivability, fumes) For other matters in general, refer to European directive REACH | The last sentence “the effect on the occupant of the aeroplane and other persons on the ground, and the environment in general, in normal and emergency situations, shall be taken into account” is covered by certification for occupants of the aeroplane. (crash survivability, fumes) For other matters in general, refer to European directive REACH |
| PART IIIB. SUB-PART D Chapter D.1.3 | The last sentence “the effect on the occupant of the aeroplane and other persons on the ground, and the environment in general, in normal and emergency situations, shall be taken into account” is covered by certification for occupants of the aeroplane. (crash survivability, fumes) For other matters in general, refer to European directive REACH | The last sentence “the effect on the occupant of the aeroplane and other persons on the ground, and the environment in general, in normal and emergency situations, shall be taken into account” is covered by certification for occupants of the aeroplane. (crash survivability, fumes) For other matters in general, refer to European directive REACH |
| PART IIIB. SUB-PART D Chapter D.2 a). | The airworthiness codes ensure compliance with sub-paragraph a) except for prevention of misassemble. | Work to address Protection against explosive and incendiary devices, based on the output of the Design for Security Harmonization WG should lead to an NPA in 2009 and a modification to CS-25 by end 2009 |
| PART IIIB. SUB-PART D Chapter D.2 b). | At this time the airworthiness codes do not mandate protection against explosive and incendiary devices.Anx | |
| PART IIIB. SUB-PART D Chapter D.2 g) 1-3. | | |
| PART IIIB. SUB-PART D Chapter D.2 h). | | |
| PART IIIB. SUB-PART D Chapter D.2 i). | | |

ANNEX 8 - Airworthiness of Aircraft - Tenth Edition

| Reference | Difference | Remarks |
|---|---|---|
| PART IIIB. SUB-PART F Chapter F.1 | At this time, the airworthiness codes do not specifically require the observing of Human Factors principles but these principles are considered during certification activities for those areas that affect the safety of the aircraft. | NPA 15/2004 relative to Flight Crew Error/Flight Crew Performance Considerations in the Flight Deck Certification Process has been published and has been incorporated into CS-25 amendment 3 EASA has included in the 2008 advance rule making planning a task MDM.035 grouping of various human factor tasks. A plan to take into account human factors into design will be proposed by an Advance NPA that should be circulated during the second of 2008. There is also a JAA interim policy (INT/POL/25/14) for large aeroplanes that has also been used by EASA |
| PART IIIB. SUB-PART F Chapter F.5 | Protection against electromagnetic interference is not specifically required by CS-23 and CS-25 | Work to address this, based on the output of the Harmonization WG is in the inventory Interim Policies developed by JAA for small and large aeroplanes are also notified by EASA as special conditions Action: EASA Target Completion Date: Task MDM.024 2010 |
| PART IIIB. SUB-PART G Chapter G.2.5 | The airworthiness codes do not specifically address the issue of limitations on equipment and systems but in practice the standard is complied with. | Paragraph X1524 was deleted from the JAR-25 and is not in CS-25. The deletion was done to harmonise with FAR-25 and the rationale was that the paragraph did not add further requirements compared to FAA practice. |
| PART IIIB SUB-PART G Chapter G.3.5 | Not covered by CS-25 | Work to address this, based on the output of the Design for Security Harmonization WG should lead to an NPA in 2009 and a modification to CS-25 by end 2009 |
| PART IIIB SUB-PART I Chapter I.1 | This provision is not included in the airworthiness codes, but in the case of new design special conditions can be used during certification to address cases where the related airworthiness code does not contain adequate or appropriate safety standards. | The statement looks like a principle for rule making. A comparable principle, not only limited to Crash worthiness may be found in Article 5.5 and article 14 of the EASA Basic Regulation. |
| PART IIIB SUB-PART I Chapter I.6 | The airworthiness codes do not address this standard except for the installation requirement, The rest is covered by the operating rules. | JAR-OPS contains the equipage requirements |
| PART IIIB SUB-PART K | At this time, the airworthiness codes do not specifically address these security standards except for pilot compartment doors. | Work to address this, based on the output of the Design for Security Harmonization WG should lead to an NPA in 2009 and a modification to CS-25 by end 2009 |
| PART IV Chapter 2 2.2.2.1 | CS-27 and CS-29 address category A and Category B Helicopters and not class 1, 2 and 3. | Performance classes 1,2 and 3 are covered in JAR-OPS 3 but are not referred to in CS 27 & 29. CS 27 & 29 refer to Category A or B. Annex 8 at amendment 100 introduces new definitions for CAT A & B and makes use of them in new Part IVB, applicable for Helicopters for which application for certification was submitted on or after 13 December 2007. Hence, CS 27 & 29 are in compliance with Annex 8 Part IVB but not Part IVA. |

ANNEX 8 - Airworthiness of Aircraft - Tenth Edition

| Reference | Difference | Remarks |
|-----------------------------------|---|---|
| PART IV Chapter 2 2.2.2.2 | CS-27 and CS-29 address category A and Category B Helicopters and not class 1, 2 and 3. | Performance classes 1,2 and 3 are covered in JAR-OPS 3 but are not referred to in CS 27 & 29. CS 27 & 29 refer to Category A or B. Annex 8 at amendment 100 introduces new definitions for CAT A & B and makes use of them in new Part IVB, applicable for Helicopters for which application for certification was submitted on or after 13 December 2007. Hence, CS 27 & 29 are in compliance with Annex 8 Part IVB but not Part IVA. |
| PART IV Chapter 2 2.2.3.1 | For category B helicopters the airworthiness code only requires take-off distance to be included in the performance data. | For Category B helicopters, only take-off distance is required to be included in the performance data while take-off distance, path and rejected take-off distance information is required for Category A helicopters. Class 1, 2 and 3 are addressed by JAR-OPS-3. Amendment 100 introduces Category A and B 2.2.31 has been the subject of a complete revision for Part IVB (Amendment 100) such that take-off distance (all engines) for all helicopters is required as per the operating rules, with additional take-off and rejected take-off distances required for Category A helicopters. |
| PART IV Chapter 2 2.2.3.1.1 | CS-27 and CS-29 address category A and Category B Helicopters and not class 1, 2 and 3 | Performance classes 1,2 and 3 are covered in JAR-OPS 3 but are not referred to in CS 27 & 29. CS 27 & 29 refer to Category A or B. Annex 8 at amendment 100 introduces new definitions for CAT A & B and makes use of them in new Part IVB, applicable for Helicopters for which application for certification was submitted on or after 13 December 2007. Hence, CS 27 & 29 are in compliance with Annex 8 Part IVB but not Part IVA. |
| PART IV Chapter 2 2.2.3.1.2 | | |
| PART IV Chapter 2 2.2.3.1.3 | | |
| PART IV Chapter 2 2.2.3.2 | The concept of two power units inoperative is not included in the airworthiness codes, but in the case of new design special conditions can be used during certification to address cases where the related airworthiness code does not contain adequate or appropriate safety standards. | En-route performance is based on climb performance both for all engines operating and one engine inoperative situations. The case of the two critical power units inoperative for helicopters having three or more engines is not addressed. Concerns only helicopters with 3 or more engines. This standard has been reviewed and found to offer no safety benefit. It has therefore been removed from Part IVB (Amendment 100) and hence the identified difference will also be removed for helicopter certificated after December 2007 |
| PART IV Chapter 2 2.2.3.3.1 | CS-27 and CS-29 address category A and Category B Helicopters and not class 1, 2 and 3. | Performance classes 1,2 and 3 are covered in JAR-OPS 3 but are not referred to in CS 27 & 29. CS 27 & 29 refer to Category A or B. Annex 8 at amendment 100 introduces new definitions for CAT A & B and makes use of them in new Part IVB, applicable for Helicopters for which application for certification was submitted on or after 13 December 2007. Hence, CS 27 & 29 are in compliance with Annex 8 Part IVB but not Part IVA. |
| PART IV Chapter 4 4.1 | At this time, the airworthiness codes do not specifically require the observing of Human Factors principles but these principles are considered during certification activities for those areas that affect the safety of the aircraft. | EASA has included in the rule making inventory a task MDM.035 grouping of various human factor tasks. A plan to take into account human factors into design will be proposed by an Advance NPA that should be circulated during the second quarter of 2008 |

ANNEX 8 - Airworthiness of Aircraft - Tenth Edition

| Reference | Difference | Remarks |
|--|---|--|
| PART IV Chapter 4 4.1.6 | The airworthiness codes ensure compliance with this standard except for the consideration of depressurization, but this issue may be addressed during certification if appropriate using the Special Condition procedure. | The airworthiness codes ensure compliance with this standard except for the consideration of depressurization, but this issue may be addressed during certification if appropriate using the Special Condition procedure. |
| PART IV Chapter 4 4.1.8 | The airworthiness codes do not specifically address the risk that ground handling operations may cause damage. | The airworthiness codes do not specifically address the risk that ground handling operations may cause damage. |
| PART IV Chapter 7 7.1 | At this time, the airworthiness codes do not specifically require the observing of Human Factors principles but these principles are considered during certification activities for those areas that affect the safety of the aircraft. | EASA has included in the rule making inventory a task MDM.035 grouping of various human factor tasks. A plan to take into account human factors into design will be proposed by an Advance NPA that should be circulated during the second quarter of 2008 |
| PART IVB. SUB-PART E Chapter E.2.7 | PART IVB. SUB-PART E Chapter E.2.7 | This is a case where a difference exists because CS 27 is more exacting or exceeds Part IVB which only requires restart capability for helicopters greater than 3175kg or which are certificated to CAT. A. |
| PART IVB. SUB-PART F Chapter F.5 Part VB F.5 | This issue is not covered by the present CS-27, CS 29 and CS 23 | However this issue is addressed by generic special conditions ensuring an equivalent level of safety to ICAO Annex 8 by other means. The Agency has included in its inventory a rule making task to address the issue (Task MDM.024) |
| PART V. SUB-PART F Chapter F.5 | | |

ANNEX 9 - Facilitation - Ninth Edition Nil

| Reference | Difference | Remarks |
|-----------|------------|---------|
| | | |

ANNEX 10 - Aeronautical Telecommunications - Volume 1 - Eight Edition

| Reference | Difference | Remarks |
|-----------------------------------|---|--|
| Amendment 93 to Annex 10 Volume 1 | Point CNS.TR.100(a) of Regulation (EU) 2017/373 requires Member States to comply with Annex 10 Volume 1 in its 6th edition of July 2006, including all amendments up to and including No 89. In particular, Galileo services shall not be considered as operational as long as they have not been declared as such to ICAO. | The proposed amendments to the Regulation 2017/373 to introduce the references to Annex 10, Volume 1 up to and including Amendment 93 are planned under rulemaking task (RMT) of EASA with the reference of RMT.0719. (Regular update of ATM/ANS rules) should be ready for publication around Q2 2024. The final adoption date not known yet. |

ANNEX 10 - Aeronautical Telecommunications - Volume II - Eight Edition

| Reference | Difference | Remarks |
|--------------------------|--|--|
| Chapter 1 Definitions | The amendment of the definitions, introduced in Amendment 93, will not be implemented at the applicability date. | To be implemented under Subtask 6 of RMT.0476 (NPA in Q4 2024, Opinion and Rules in 2025). |
| Chapter 3 3.9 | This new section, introduced in Amendment 93, will not be implemented at the applicability date. | To be implemented under Subtask 6 of RMT.0476 (NPA in Q4 2024, Opinion and Rules in 2025). |

ANNEX 10 - Aeronautical Telecommunications - Volume II - Eight Edition

| Reference | Difference | Remarks |
|------------------------|---|--|
| Chapter 5 5.2.1.4.1 | <p>SERA.14035 Transmission of numbers in radiotelephony</p> <p>(a) Transmission of numbers</p> <p>(1) All numbers used in the transmission of aircraft call sign, headings, runway, wind direction and speed shall be transmitted by pronouncing each digit separately.</p> <p>(i) Flight levels shall be transmitted by pronouncing each digit separately <u>except for the case of flight levels in whole hundreds.</u></p> <p>(ii) The altimeter setting shall be transmitted by pronouncing each digit separately <u>except for the case of a setting of 1 000 hPa which shall be transmitted as "ONE THOUSAND"</u></p> <p>(iii) All numbers used in the transmission of transponder codes shall be transmitted by pronouncing each digit separately <u>except that, when the transponder codes contain whole thousands only, the information shall be transmitted by pronouncing the digit in the number of thousands followed by the word "THOUSAND".</u></p> <p>(2) All numbers used in the transmission of other information than those described in point (a)(1) shall be transmitted by pronouncing each digit separately, except that all numbers containing whole hundreds and whole thousands shall be transmitted by pronouncing each digit in the number of hundreds and thousands followed by the word "HUNDRED" or "THOUSAND", as appropriate. Combinations of thousands and whole hundreds shall be transmitted by pronouncing each digit in the number of thousands followed by the word "THOUSAND", followed by the number of hundreds, followed by the word "HUNDRED".</p> <p>(3) In cases where there is a need to clarify the number transmitted as whole thousands and/or whole hundreds, the number shall be transmitted by pronouncing each digit separately</p> <p>(4) When providing information regarding relative bearing to an object or to conflicting traffic in terms of the 12-hour clock, the information shall be given pronouncing the digits together such as "TEN O'CLOCK" or "ELEVEN O'CLOCK".</p> <p>(5) Numbers containing a decimal point shall be transmitted as prescribed in point (a)(1) with the decimal point in appropriate sequence indicated by the word "DECIMAL".</p> <p>(6) All six digits of the numerical designator shall be used to identify the transmitting channel in Very High Frequency (VHF) radiotelephony communications except in the case of both the fifth and sixth digits being zeros, in which case only the first four digits shall be used.</p> | ICAO Annex 10, Volume II, Chapter 5.2.1.4.1 is transposed in point SERA.14035 of Implementing Regulation (EU) No 923/2012 with some differences. |

ANNEX 10 - Aeronautical Telecommunications - Volume IV - Fourth Edition

| Reference | Difference | Remarks |
|------------------------|---|--|
| Chapter 4 4.3.5.3.1 | The mandate for carriage of TCAS Version 7.1 is currently part of EASA Rule making programme - EASA NPA 2010.03 refers. | The proposed forward fit mandate is for 1st March 2012 which exceeds ICAO standards |
| Chapter 4 4.3.5.3.2 | The mandate for carriage of TCAS Version 7.1 is currently part of EASA Rule making programme - EASA NPA 2010.03 refers. | The proposed forward fit mandate is for 1st March 2012 |
| Chapter 4 4.3.5.3.3 | The mandate for carriage of TCAS Version 7.1 is currently part of EASA Rule making programme - EASA NPA 2010.03 refers. | The proposed forward fit mandate is for 1st March 2012 and retrofit mandate is for 1st March 2014 which exceeds ICAO standards |
| Chapter 7 7.1.1.1.1 | EU Implementing Rules currently do not address ADS-B In | Pending EU Implementing Rules |
| Chapter 7 7.1.1.2.1 | EU Implementing Rules currently do not address ADS-B In | Pending EU Implementing Rules |
| Chapter 7 7.1.1.3.1 | EU Implementing Rules currently do not address ADS-B In | Pending EU Implementing Rules |
| Chapter 7 7.1.2.1 | EU Implementing Rules currently do not address ADS-B In | Pending EU Implementing Rules |
| Chapter 7 7.1.2.2 | EU Implementing Rules currently do not address ADS-B In | Pending EU Implementing Rules |
| Chapter 7 7.1.2.3 | EU Implementing Rules currently do not address ADS-B In | Pending EU Implementing Rules |

ANNEX 11 - Air Traffic Services - Fifteenth Edition

| Reference | Difference | Remarks |
|---------------------------------|--|---|
| Chapter 2 2.13.1 | Within the Shannon UIR / FIR, VOR change over points have not been established | |
| Chapter 2 2.25.5 | 'Time checks shall be given <u>at least</u> to the nearest minute' | Implementing Regulation (EU) No 923/2012 SERA.3401(d)(1) differs from ICAO Annex 11, standard 2.25.5 |
| Chapter 2 Paragraph 2.6.1 | | Exemption possibility. Implementing Regulation (EU) No 923/2012 SERA.6001 allows aircraft to exceed the 250kts speed limit where approved by the competent authority for aircraft types, which for technical or safety reasons, cannot maintain this speed. |

ANNEX 11 - Air Traffic Services - Fifteenth Edition

| Reference | Difference | Remarks |
|-----------|---|---|
| Chapter 3 | <p>(b) Clearances issued by air traffic control units shall provide separation:</p> <ol style="list-style-type: none"> 1. between all flights in airspace Classes A and B 2. between IFR flights in airspace Classes C, D and E; 3. between IFR flights and VFR flights in airspace Class C; 4. between IFR flights and special VFR flights; 5. between special VFR flights unless otherwise prescribed by the competent authority; <p>except that, when requested by the pilot of an aircraft <u>and agreed by the pilot of the other aircraft</u> and if so prescribed by the competent authority for the cases listed under (b) above in airspace Classes D and E, a flight may be cleared <u>subject to maintaining own separation in respect of a specific portion of the flight below 3050m (10,000ft) during climb or decent, during day in visual meteorological conditions.</u></p> | New provision. Implementing Regulation (EU) No 923/2012, paragraph SERA.8005 (b) |
| Chapter 3 | <p>(e) Read-back of clearances and safety-related information</p> <p>(1) The flight crew shall read back to the air traffic controller safety-related parts of ATC clearances and instructions which are transmitted by voice. The following items shall always be read back:</p> <ol style="list-style-type: none"> (i) ATC route clearances; (ii) clearances and instructions to enter, land on, take off from, hold short of, cross, <u>taxi</u> and backtrack on any runway; and (iii) runway-in-use, altimeter settings, SSR codes, <u>newly assigned communication channels</u>, level instructions, heading and speed instructions; and (iv) transition levels, whether issued by the controller or contained in ATIS broadcasts. | Implementing Regulation (EU) No 923/2012, paragraph SERA.8015, specifies (with the addition to ICAO Standard in Annex 11, 3.7.3.1 of the underlined text) |
| Chapter 3 | <p>(2) Other clearances or instructions, including conditional clearances <u>and taxi instructions</u>, shall be read back or acknowledged in a manner to clearly indicate that they have been understood and will be complied with.</p> | Implementing Regulation (EU) No 923/2012, paragraph SERA.8015(e)(2), specifies (with the addition to ICAO Standard in Annex 11, 3.7.3.1.1 of the underlined text) |

ANNEX 11 - Air Traffic Services - Fifteenth Edition

| Reference | Difference | Remarks |
|-----------|--|--|
| Chapter 3 | Special VFR flights may be authorised to operate within a control zone, subject to an ATC clearance. Except when permitted by the competent authority for helicopters in special cases such as, but not limited to, police, medical, search and rescue operations and fire-fighting flights, the following additional conditions shall be applied: (a) such special VFR flights may be conducted during day only, unless otherwise permitted by the competent authority; (b) by the pilot: (1) clear of cloud and with the surface in sight; (2) the flight visibility is not less than 1500 m or, for helicopters, not less than 800 m; (3) fly at a speed of 140 kts IAS or less to give adequate opportunity to observe other traffic and any obstacles in time to avoid a collision; and (c) an air traffic control unit shall not issue a Special VFR clearance to aircraft to take off or land at an aerodrome within a control zone, or enter the aerodrome traffic zone or aerodrome traffic circuit when the reported meteorological conditions at that aerodrome are below the following minima: (1) the ground visibility is not less than 1500m or, for helicopters, not less than 800m; (2) the ceiling is not less than 180m (600 ft). | New provision. Implementing Regulation (EU) No 923/2012 point SERA.5010 Special VFR in control zones |

ANNEX 12 - Search And Rescue - Eighth Edition Nil

| Reference | Difference | Remarks |
|-----------|------------|---------|
| | | |

ANNEX 13 - Aircraft Accident And Incident Investigation - Ninth Edition Nil

| Reference | Difference | Remarks |
|-----------|------------|---------|
| | | |

ANNEX 14 - Aerodromes - Fourth Edition Nil

| Reference | Difference | Remarks |
|-----------|------------|---------|
| | | |

ANNEX 15 - Aeronautical Information Service - Twelfth Edition

| Reference | Difference | Remarks |
|----------------------------------|---|--|
| Chapter 4 4.1.3 (Standard) | Area Chart ICAO The Area Chart ICAO is not produced in Ireland | Requirements are fulfilled by other means SID, STAR, Approach 1:250,000, 1:500,000 and EN Route charts |

ANNEX 16 - Environmental Protection - Fifth Edition Nil

| Reference | Difference | Remarks |
|-----------|------------|---------|
| | | |

ANNEX 17 - Security - Eighth Edition Nil

| Reference | Difference | Remarks |
|-----------|------------|---------|
| | | |

ANNEX 18 - The Safe Transport Of Dangerous Goods By Air - Third Edition Nil

| Reference | Difference | Remarks |
|-----------|------------|---------|
| | | |

ANNEX 19 - Safety Management- First Edition

| Reference | Difference | Remarks |
|--------------------|--|---------|
| Chapter 3 3.1.3 | SMS not yet addressed in the EASA regulations on design, production and maintenance organisations. | |
| Chapter 3 3.1.4 | Not yet applicable. | |
| Chapter 4 4.1.1 | SMS is not yet addressed in Reg. (EU) 1321/2014 and Reg (EC) 748/2012. | |
| Chapter 4 4.1.5 | SMS is not yet addressed in Commission Regulation (EC) 748/2012. | |
| Chapter 4 4.1.6 | SMS is not yet addressed in Commission Regulation (EC) 748/2012. | |
| Chapter 4 4.2.1 | Not yet applicable. | |
| Chapter 4 4.2.2 | Not yet applicable. | |

DOC 8168 - Procedure for Air Navigation Services - Aircraft Operations Vol 11 (Construction of visual and instrument Flight Procedures) (4th Edition including AMDT) - Nil

| Reference | Difference | Remarks |
|-----------|------------|---------|
| | | |

DOC 4444 - Procedures for Air Navigation Services - Air Traffic Management - Sixteenth Edition

| Reference | Difference | Remarks |
|---------------------------------------|--|--|
| Chapter 12 12.3.1.2 (z) to (kk) | Revised SID/STAR phraseology not yet implemented | Work is under way to effect implementation of the PANS-ATM Amendment 7-A phraseology (date to be confirmed but not before Q4 2018) |
| Chapter 12 12.3.3.1 (g) to (h) | Revised departure instructions phraseology not yet implemented | Work is under way to effect implementation of the PANS-ATM Amendment 7-A phraseology (date to be confirmed but not before Q4 2018) |
| Chapter 12 12.3.3.2 (d) to (f) | Revised approach instructions phraseology not yet implemented | Work is under way to effect implementation of the PANS-ATM Amendment 7-A phraseology (date to be confirmed but not before Q4 2018) |

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