

22nd March 2021

Ms. Grainne Guinan,
Commission on the Defence Forces,
Agriculture House,
Kildare Street,
Dublin 2.

Re: Commission on the Defence Forces (Ireland) - Public Consultation Process

Dear Grainne,

I am writing in relation to the above consultation. We welcome the opportunity to respond to this consultation, as well as the establishment of the Commission on the Defence Forces, and its comprehensive review of the Defence Forces. A modern, agile, well resourced Defence Forces is a key requirement for a progressive sovereign state such as Ireland. The IAA welcomes this opportunity for enhanced dialogue, consultation and cooperation between the IAA and the Defence Forces/ Air Corp. It is our view that the safety and security of civil and military aviation operations are aligned, and it is in the interest of both civil aviation in Ireland and the Defence Forces to continue to develop this strong relationship.

The Irish Aviation Authority (IAA) has the following high-level observations on the consultation for consideration by the Commission on the Defence Forces.

1. **Aircraft Range:** The Defence Forces should have full capability to detect potential aircraft infringements into our national airspace. At the moment, the IAA are doing some monitoring [REDACTED] and reporting to the Department of Transport (DoT); however, the IAA believes it would be best practice for the Defence Forces/ Department of Defence to have a role in the monitoring, reporting and classification of these occurrences, [REDACTED]

[REDACTED]

[REDACTED] The IAA will be happy to discuss this matter in more detail with the Commission as appropriate.

2. **Resources:** [REDACTED]
[REDACTED] There may be a range of options available to assist in resolving this difficulty and the IAA can work with the Air Corps as appropriate.

3. **Search & Rescue:** The JRCC (Joint Rescue Control Centre) initiative has put a rejuvenated focus on the whole area of Search & Rescue within the Shannon FIR. The Defence Forces play an integral role in the provision of SAR assets, the future defence forces should ensure the continuation and strengthening of resources available for SAR.
4. **Aircraft Capabilities:** Fishery Patrol, GASU and other AER Corps aircraft should continue to keep up to date with evolving airborne side aircraft requirements such as Mode S & ADS_B capable transponders.
5. **Baldonnell:** Baldonnell's airspace has an impact on traffic arriving and departing from Dublin airport. While the IAA completely understands the purpose of having areas for military flight training, the geographical location of these areas in respect to Dublin airport can cause issues, associated with efficiency of operations. With increasing environmental considerations evolving and even more environmental metrics being considered, the impact that Baldonnell has on the flight paths in to and out of Dublin Airport (including CDO and CCO) will become important. Therefore, more flexible use of airspace is required. An overarching strategy for the flexible use of military airspace could be of benefit to both civil and military aviation interests.
6. **Drone Operations:** UAV/ drone operations are likely to become a more prominent feature for both civil and military aviation operations over the next decade. A government strategy which considers the requirements of the Defence Forces, business and recreational interests and managing the interface between U-space and controlled airspace would provide an important framework for the consideration and harmonisation of interests.

Please feel free to contact me regarding the above should you have any queries.

Kind regards,

Paul Brandon
Head of Corporate Affairs
Irish Aviation Authority