European Aviation Safety Agency

2005 Activity Report

Foreword

Regulation 1592/2002 established the European Aviation Safety Agency as the centrepiece of a new European system for aviation safety regulation. For the first time the framework for a fully harmonised system for initial and continuing airworthiness of aeronautical products was created, operational in the whole community.

The Agency started its activity in 2003, and this was developed over the course of 2004, with the set up of the different directorates, the recruitment of its first staff, and the launch of the first programmes.

Despite the progress over that period, 2005 can by no means be considered as a year of mature operation, and in many respects the Agency must be considered as still being in a start up phase. The Agency has yet to extend to a wider scope, encompassing airline operations and flight crew licensing as envisaged in the Basic Regulation; and the number of staff employed remains far below the levels expected for normal operations.

Moreover, 2005 has been marred by considerable financial uncertainty. The Fees and Charges Regulation was intended as the legal mechanism to ensure long term funding of the Agency's certification activities, but it entered into force on 1st June 2005 after considerable delays, and it quickly became apparent that it failed to levy funds at a level sufficient to cover all the costs of the Agency's certification tasks.

This emerging problem impacted profoundly the Agency's work: the priorities required constant reappraisal and revision. Considerable time and efforts were devoted to implementing the regulation and the insufficient resources provided by the regulation had also a considerable effect on the 2006 budget which has required several amendments. Although the fees and charges Regulation has now been amended, increasing fee revenue to meet the immediate needs of certification activities, an in depth revision before the end of 2006 is still necessary in order to put these activities on a stable footing from 2007 onwards.

Given these circumstances, the challenge of implementing the Fees and Charges Regulation whilst carrying out the Agency's key tasks uninterrupted cannot be understated.

Coping with fees and charges does not cover the full range of achievements in 2005. The Agency also established key support processes, relative to its establishment and practical working, including provisions for further refinements as the fees and charges system is put on a firmer footing. Steps were taken in order to deepen links with third country authorities, to manage and develop procedures for proper functioning, to create systems, structures and applications for diverse items such as Quality Management, handling appeals or managing audits. There is still work to do, but most crucial priorities have been met.

In achieving these targets, the Agency has often worked to the very limits of its capacity. This has required significant dedication from the Agency's staff, and constant support from its partners, including industry, the NAAs and the Commission.

The Agency will continue to improve and further develop its capacity to operate effectively and cost-efficiently, and looks forward to working with and receiving support from all its key partners during the years ahead.

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Milestones achieved by the Agency in 2005

✸ Completed the annual certification objectives for all major certification programmes (A380, Boeing 787)

✸ Implemented the Fees and Charges Regulation[1], determining a common charging scheme for all certification tasks

✸ Initiated the first meeting with European Accident investigation bodies, leading to the establishment of a cooperative working culture

✸ Hosted the 2005 International Aviation Safety Conference in Cologne gathering some 300 participants from all continents in order to share reflections on the future of aviation safety

✸ Organised workshop on fuel tank safety, attended by European airliners, aerospace industry and maintenance organisations, to present and discuss Agency plans with regards to maintenance actions and flammability reduction systems

✸ On the basis of Agency opinion 3/2004, the European Commission adopted a proposal to the European Parliament and the Council extending the Agency's remit to the safety regulation of air operations, flight crew licensing and third country aircraft.

✸ Launched the Standardisation inspection programmes

✸ Issued more than 8,000 product Certificates, 265 new organisational approvals and performed all related oversight activities

✸ Agreed and signed the extended working arrangement with the General Administration of the Civil Aviation of China as to Eurocopter and Dassault products

✸ Agreed and signed a working agreement with ICAO for the USOAP audit

✸ Hosted audits by major international counterparts and organisations (FAA – ICAO)

✸ Integrated EEA countries Norway, Iceland and into the EASA system

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[1] Regulation EC 488/2005 on the Fees and Charges levied by the European Aviation Safety Agency (June)

List of Acronyms used

AD	Airworthiness Directive
AGNA	Advisory Group of National Authorities
AMC	Acceptable Means of Compliance
ART	Airworthiness Review Team
ASC	Air Safety Committee
ASD	AeroSpace and Defence Industries Association of Europe
ATM	Air Traffic Management
ATM/CNS	ATM/ Communication, Navigation and Surveillance
BASA	Bilateral Air Safety Agreement
CAEP	Committee on Aviation Environmental Protection
CAST	Continuing Airworthiness Standardisation team
CIS	Community of Independent States
C-JAA	Central Joint Aviation Authorities
COSCAP	Co-operative Development of Operational Staff
CRD	Comment Response Document
CS	Certification Specification
DOA	Design Organisation Approval
EASA	European Aviation Safety Agency
ECAC	European Civil Aviation Conference
ECCAIRS	European Co-ordination for Aviation Incident Reporting System
EEA	European Economic Area
EFTA	European Free Trade Association
ETSO	European Technical Standard Order
FAA	Federal Aviation Administration
GM	Guidance Material
ICAO	International Civil Aviation Organisation
IPA	Implementation Procedure for Airworthiness
ISC	Internal Safety Committee
MAST	Maintenance Standardisation Team
MIP	Maintenance Implementation Procedure
MIST	Maintenance International Standardisation Team
NAAs	National Aviation Authorities
NPA	Notice of Proposed Amendment
PCM	Product Certification Manager
POAST	Production Organisation Approval Standardisation Team
RIA	Regulatory Impact Assessment
RNP	Required Navigation Performance
SAFA	Safety Assessment of Foreign Aircraft
SSCC	Safety Standards Consultative Committee
STC	Supplemental Type Certificate
TC	Type Certificate
UAV	Unmanned Aerial Vehicle
USOAP	Universal Safety Oversight Audit Program
WG	Working Group

1. Continuity and forward thinking

After preparatory regulatory work, the Agency started its certification operations with the entry into force of the Basic Regulation on 28 September 2003. Its work was then organised via letters of delegation to National Aviation Authorities (NAAs), entrusted with carrying out tasks under the Agency's supervision. Through 2003 and 2004, this system of allocation was maintained, whilst the other regulatory functions of the Agency were organised and started work.

The system proved to be operational. As expected during this transition period, the growth of the Agency allowed initial internalisation of some tasks previously allocated to the NAAs.

In 2005, this internalisation, plus the entry into force of the Fees and Charges Regulation, induced a number of changes to the daily work of the Agency and its sub-contracted NAAs. Despite this, no disruption of operations was incurred; the Agency made a point of ensuring complete continuity to all its activities in spite of a difficult administrative context.

1.1. Defining rules

1.1.1. Assessing the need for rules

The implementation of a uniform set of aviation safety regulations throughout Europe is per se the raison d'être of the Agency. The existing and long established codes and rules were largely taken into account for the drafting of the Implementing Rules of the Basic Regulation in 2003[2]. Aviation safety rules have to constantly remain in line with latest developments, including technological and scientific progress, analysis of safety risks, and the actual needs of industry.

➤ **Analysing situations and taking lessons from air accidents: Answering to safety recommendations, creating a cooperative culture with accident investigation bodies and raising levels of safety**

The Agency must act, react and anticipate safety needs. It is therefore crucial that all safety information and data are properly analysed and that lessons to be learnt from these are properly disseminated within the Agency and to the organisations concerned.

A link was created with accident investigation bodies in 2005 both in Europe and worldwide in order to establish the Agency as one of the addressee of the safety recommendations they issue. The answers brought to these recommendations can be addressed in the short term by the Certification Directorate when immediate action is necessary, for example by issuing an Airworthiness Directive. In the mid-term, safety recommendations can be answered by the definition or revision of Acceptable Means of Compliance (AMC) or Guidance Material (GM). In the longer term, and where more fundamental revision is required, an opinion can be issued, which may lead to a regulatory modification.

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[2] Commission Regulation EC 1702/2003 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations and Commission Regulation (EC) No 2042/2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

Additionally, in the event of major accident, the Agency at the request of the European Commission can modify its annual standardisation inspection programme[3], when approved by the Management Board, in order to accommodate additional inspections as appropriate.

An Internal Safety Committee, composed of the Executive Director, the Directors[4] and the Head of Safety was created in order to deal with European safety performance and trends, review significant safety issues, monitor follow up actions on accident investigation recommendations and eventually propose a safety plan.

➤ **Involving stakeholders**

The need for developing new safety initiatives or actions is also identified via discussion with stakeholders in various forums such as the Commission's '3922' Air Safety Committee (ASC), the Safety Standard Consultative Committee (SSCC) and Advisory Group of National Authorities (AGNA).

The Agency participated in the ASC, most significantly in drafting the regulation for the transfer of SAFA from the CJAA to the Agency. A draft regulation for the protection of safety occurrence data is in discussion. The Agency also took part in the ECCAIRS Steering Committee and other working groups.

Links were created with industry in order to discuss specific items such as helicopter safety and suspect parts.

➤ **Incorporating state of the art research and worldwide standards**

The Agency took part in the meeting of the JAA Research Committee and the ECAC Group of Experts on Accident Investigation.

1.1.2. Amending or establishing rules

The focus in the regulatory area during the year was on the implementation of the 2005 rulemaking programme, whilst carrying out preparatory work for the years forthcoming, working towards the extension of the Agency's scope, promoting better understanding of the rules by the users and initiating work on the streamlining of processes.

➤ **The major regulatory tasks in 2005**

The 2005 Rulemaking Programme consisted of 29 tasks to be finalised during the year. The delays in hiring staff, lack of practice with the heavy rulemaking process and insufficient use of outsourcing to external experts limited the Agency's ability to fully meet its objectives. Only 7 tasks were fully executed, but all were initiated. For all but two, an NPA was issued, as well as 11 Comment Response Documents (CRD). If we consider that a Notice of Proposed Amendment (NPA) represents half of the work and a CRD three quarters of it, this means that 70% of the work had been done by year end.

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[3] The standardisation inspection programme typically consists of bi-annual visits, differing in case of major concerns
[4] All but the Administrative Director

Some of the accomplishments during 2005 were:

✱ Issue of 4 opinions improving the quality of Commission Regulations (EC) n°1702/2003 and 2042/2003

✱ Issue of 1 opinion on the approval of navigational database suppliers for Required Navigation Performance (RNP) operations and related standards

✱ Adoption of the completely revised Certification Specifications for large aeroplanes (CS-25), incorporating the input from 5 different NPAs, thanks to the concerted efforts of Agency staff and national/industry experts over the last two years

✱ Issue of 1 decision amending Annex IV of the Acceptable Means of Compliance (AMC) to Part 66

✱ Publication of the Advance Notice of Proposed Amendment on a "Policy for Unmanned Aerial Vehicle (UAV) certification" aimed at eliciting public input on this new activity

✱ Launch of an NPA implementing the changes resulting from International Civil Aviation Organisation (ICAO) Committee on Aviation Environmental protection (CAEP)

✱ Release of the NPA on Part M revisions resulting from the Regulatory Impact Assessment (RIA);

✱ Issue of two NPAs on fuel tank safety matters

In addition, 6 opinions were delivered to the European Commission in the framework of the implementation of Article 10 of the Basic regulation dealing with derogations from requirements, as laid down in Commission Regulations (EC) n° 1702/2003 and 2042/2003.

To support the limited resources available internally, the Agency awarded contracts to external experts to draft preliminary regulatory impact assessments and initiated negotiations with EUROCAE with a view to establishing a contract on the development of draft European Technical Standard Orders.

As regards preparatory work for the future, the results again show a discrepancy between the expectations contained in the Advance Planning and the actual capacity of the Agency to deliver. Only 29 of the 43 planned tasks could be initiated.

Drawing on the experience of the last 2 years, future programmes will have to be better tailored to the resources available and the rulemaking procedure, in particular that for guidance material, will need to be streamlined.

➤ **Planning ahead on the short and longer term**

Over the first half of 2005, the Agency worked on the development of its 2006 Rulemaking Programme and Advance Planning with the help of the Advisory Group of National Authorities (AGNA) and the Safety Standards Consultative Committee (SSCC). In this respect, 68 preliminary regulatory impact assessments were issued in order to support the prioritisation of rulemaking activities. This allowed them to be adopted and published before the summer period.

In view however of the delays encountered in 2005, a significant rethought of the 2006 programmes appeared necessary. After consultation with its advisory bodies, the Agency issued its revised programmes before the end of December.

➤ **Extending the scope of Agency competence**

A major step forward was achieved in 2005 when the European Commission, after thorough co-ordination with the Agency, adopted a proposal to the European Parliament and the Council extending the Agency's remit to the safety regulation of air operations, flight crew licensing and third country aircraft, on the basis of Agency opinion 3/2004. Once the proposal is adopted Europe will move towards achieving its overall strategy encompassing the various components of aviation safety.

Acting on the basis of the European Civil Aviation Conference (ECAC) Director-Generals' conclusions on the future of the JAA, the Agency and Central JAA initiated an important work to analyse the various options and prepare the ground for a seamless transfer of CJAA tasks in the area of air operations and flight crew licensing to the Agency by 1st January 2007.

The Agency initiated preparatory work with the assistance of experts nominated by the Group of Airport Safety Regulators and the Joint Aviation Authorities as to the basic principles and essential requirements for the safety regulation of aerodromes.

Steps have also been taken to ensure proper co-ordination between the activities of the Agency and those of the JAA and Eurocontrol in the regulation of Air Traffic Management/Communication, Navigation and Surveillance (ATM/CNS)

Whilst it is acknowledged that further work is required, the Agency also designed the overall structure of a possible future coherent framework for integrating all implementing rules needed to regulate aviation safety at Community level, namely the General EASA Rule Template.

➤ **Promote a better understanding of rules by stakeholders**

The daily challenge of providing rules to enhance safety, deliver good environmental protection and promote cost-efficiency is closely linked with the creation of a seamless system across Europe. Throughout 2005, the Agency continued to provide technical support to the aviation industry, air operators, the national aviation authorities, and professional organisations in their efforts to implement the rules at local level. The Agency therefore held one workshop in Cologne and seven others in the Member States on the themes of Commission Regulation (EC) n° 2042/2003 and its Parts M/-145/-66/-147 with the view to improving information exchange and addressing stakeholders' concerns.

The Agency also worked extensively with the general aviation community to address issues related to the application of Part M. In November 2005, the Agency and Europe Air Sports jointly hosted a workshop, with the participation of more than 70 stakeholders, to discuss the sector's needs and concerns. As the majority of stakeholders felt that they were over-regulated and that current rules were inappropriate and therefore could not be implemented, the Agency agreed to review its regulations and practices and adapt them to the complexity of the aircraft concerned[5].

The Agency had thorough discussions with stakeholders operating former Russian built aircraft on the difficulties in implementing Parts 145 and Part M for these aircraft. A course of action was agreed upon, in co-operation with the Interstate Aviation Committee of the Commonwealth of Independent States, to examine how these aircraft could continue their operations.

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[5] This activity has been added to the task of the group that was to develop implementing rules for operations and flight crew licensing for non complex aircraft not engaged in commercial air transport.

The Agency also worked on addressing the continued operation of aircraft whose type-certificate cannot be maintained valid: the so-called orphan aircraft. Accordingly, it has issued a policy document for discussion that envisages the issuing of restricted certificates of airworthiness under a scheme of minimum continued monitoring of airworthiness organised by the Agency in co-operation with the National Aviation Authorities concerned.

1.2. Applying aviation safety requirements: from certification to standardisation

1.2.1. Application of single requirements: a first in Europe

➤ **From NAA certification cultures to the European approach**

The past variety of different NAA certification cultures (different levels of direct technical involvement, depth of investigation and surveillance) was a key reason in establishing the Agency. With the taking over of certification tasks from NAAs and the introduction of a single European Fees and Charges system[6]), the European certification system, for the first time ever, became transparent in terms of resources needed and total costs.

By setting up its own core teams of certification experts and efficient certification processes the Agency continued to implement a single certification and safety oversight culture in Europe. This was appreciated by most stakeholders and monitored by external partners like ICAO and the FAA.

➤ **The Agency's certification strategy**

In the course of 2005, the continuity of action for the Agency was clearly placed under the auspices of the implementation of a certification strategy. This strategy had been developed in close collaboration with NAAs and aimed to ensure the permanence of all certification and safety oversight activities whilst building up its own European aviation safety culture based on best practices of the JAA and NAAs.

The strategy is orientated around several aspects:

- *Cooperation with NAAs*
  Service contracts with all major NAAs were concluded enabling the Agency to use best resources available at NAA level to discharge its responsibilities

- *Building up own expertise*
  Safeguarding the expertise existing at European level by hiring from all NAAs a core team of highly experienced experts in all domains of activity continued. 45 new Project Certification Managers (PCMs) and certification experts joined the Agency

- *Internalising tasks*
  With the arrival of new experts the internalisation of certification tasks continued. By the end of 2005 all major transport aircraft and engine programmes, including the related continuing airworthiness tasks, were

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[6] Including its subsequent necessities (all applications directly to the Agency, tight resources management and financial control by the Agency

already managed centrally from Cologne. This includes prominent certification programmes like Airbus A380, Boeing 787, and engine programmes like Rolls Royce Trent 700, CFM56 and GE NX.

- *Using DOA privileges*
  In line with the certification strategy and also due to the September 2005 deadline set by the Regulation a number of new DOAs were granted. The total number of approved design organisations and alternative procedures today is in line with the initial expectations

- *Monitoring the transition*
  The transition period and its related risks were closely monitored by the EASA NAA Certification Transition Working Group. This included the development and detailed analysis of the EASA recruitment risk register.

Due to the limited number of highly qualified certification staff in Europe, one of the main challenges for the Agency and the NAAs was human resource management. Clear indications were received[7] that the internalisation process would need to be accelerated during next year because the reduction of resources within NAAs might happen faster than initially expected.

The following chart illustrates the number of certificates and approvals issued throughout 2005:
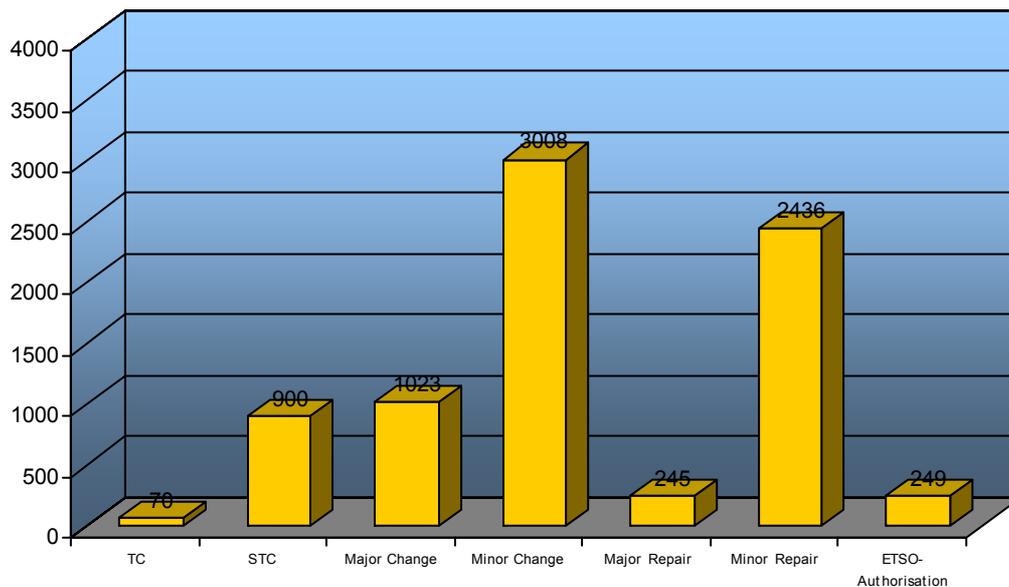
Number of Certificates/Approvals issued 2005

In addition 265 new organisational approvals were issued ranging from design organisations of various sizes located within the territory of the EU to maintenance organisations located worldwide. A limited number of foreign production and maintenance training organisations were approved as well.

## ➤ The Agency's safety oversight activities

On a product level the Agency monitored the continuing airworthiness of more than 800 approved type designs and related parts and appliances. The analysis of in-service events and regular airworthiness reviews in cooperation with certificate

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[7] From regular contract management meetings with NAAs

holders led to 489 corrective actions (Airworthiness Directives) mandated by the Agency.

At the same time periodical surveillance of approved organisations forms the second pillar of the Agency's safety oversight system ensuring the continuing of compliance with the rules applicable.

The following chart illustrates the number of approved organisations under surveillance at the end of 2005
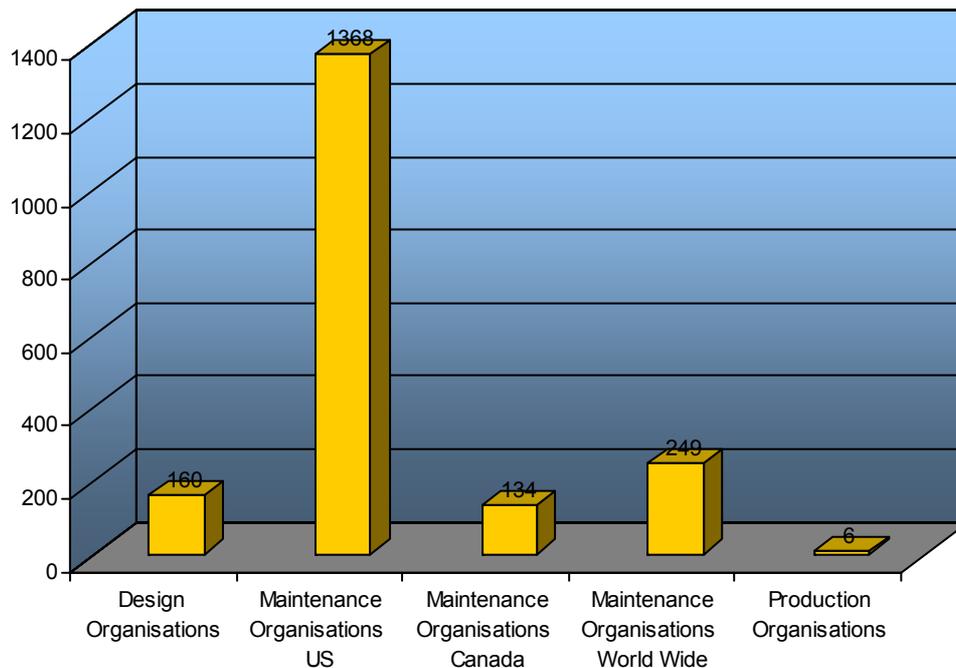
Number of approved organisations under surveillance end of 2005

➤ **An emphasis put on the dissemination of Airworthiness Directives (ADs)**

Airworthiness Directives from the Agency addressed to Type Certificate holders to correct potential design deficiencies are published on the Agency's website.

A process to prepare proposed ADs and to ensure follow up to final ADs was put in place. Further refinements were envisaged in order to address urgent needs expressed by Industry and Member States. The Agency set up an action plan to establish a comprehensive and active AD distribution and publication system[8].

1.2.2. A common understanding and uniform application

➤ **Monitoring the application of rules within the NAAs through the standardisation process**

"Standardisation" is the process of inspecting Member States' national aviation authorities in order to monitor the application of the EU rules, as provided by the Basic Regulation.

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[8] Finished in April 2006

The main part of the process within standardisation is the inspection in the country; which includes a review of the NAA itself and visits to selected undertakings where the NAA's activity relating to those undertakings is checked. There are therefore two kinds of findings: those made in relation to the NAA itself and those made regarding the undertakings. The latter are only recorded and passed to the NAA for further enforcement. They constitute evidence of failure of the NAA to perform its mission in compliance with the rule.

The team approach is at the heart of standardisation: the various views from the various team members coming from EASA or seconded by the different NAAs ultimately ensure a standardised approach to the visited country. Indeed, each team member is encouraged to share the methodology and the results within his NAA which also helps to standardise countries other than the one visited, and allows both to educate and to be educated.

➢ **Major achievement in 2005: a comprehensive standardisation programme was carried out regardless of the continued absence of the standardisation regulation**

The Standardisation Programme consists of inspections regarding both Initial and Continuing Airworthiness

As regards the Initial Airworthiness standardisation programme (commonly called POAST, which stands for Production Organization Approval Standardisation Team), this aims to ensure that States fully comply with Commission Regulation 1702/2003 in the field of Parts-21, Subpart F and G, mainly Section B.

It became mandatory for Member States on 28 September 2005 to issue and maintain Production Organisation Approvals according to the Commission Regulation mentioned above for products, parts and appliances specified in Regulation 1592/2002. This was a major task especially for those Member States which had not implemented the JAA system in the field of production.

The POAST Standardisation programme for 2005 consisted in visits to 8 countries (of which Belgium was postponed to January 2006) which resulted in 28 non-compliance findings[9] and 37 comments/ observations raised (a total of 65 actions was required from the NAAs).

The number of corrective actions required doubled in 2005 compared to 2004 due to the inspection of countries which were not standardised under the JAA system.

As regards the Continuing Airworthiness standardisation programme (commonly called MAST, which stands for MAintenance Standardisation Team), this aims at ensuring that Member States fully comply with Commission Regulation 2042/2003 in the fields Parts-M, Part-145, Part-66, Part-147 and Part-21 subpart H.

A total of 19 countries (14 member states, 2 EFTA states and 3 other JAA full member states) were visited in 2005, representing 60% of EASA and JAA countries. Indeed, 18 visits were originally planned but an additional visit (Cyprus) was added at the request of the European Commission.

In 2005, 675 non-compliance findings were raised including findings raised against organisations as defined in the JAA standardisation procedures temporarily applied until the Commission Regulation on standardisation comes into force. This represents a major increase compared to the previous years in

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[9] A "non-compliance finding" is a direct non-compliance with the Regulation requirements whilst a "Comment / Observation" is a indirect non-compliance with the Regulation requirements.

the JAA system since the total amount of findings has almost doubled whereas the number of visits remained approximately the same as in previous years.

This increase in the number of findings was due to a number of factors, the main one being a more stringent legal framework with several new requirements.

Out of the 19 visits performed in 2005, none could be completely closed during the year 2005. However, a significant number of findings (28%) could be closed in the same period.

For the countries where difficulties have been experienced in the rectification of the findings, a closer follow-up has been launched and a further inspection will be scheduled in 2006.

The completion of standardisation procedures has been postponed because of the delay in the adoption of the Commission Regulation on Standardisation. The Quality and Standardisation Directorate has been actively involved in the drafting of this Regulation and a budgetary impact assessment has been also developed and passed to the Commission.

As mentioned above, some visits were dedicated to non-EU JAA countries[10]. The support of NAAs has been important especially for Continuing Airworthiness, where 74 NAA inspectors have been involved. On the overall number of inspectors for Continuing Airworthiness, 68% were from EU-NAA, 14% from JAA-NAA and 18% from EASA.

Standardisation inspections
POAST (Part 21 Subpart F and G)
Switzerland, Norway, Poland, Spain, Sweden, Czech Republic, Denmark
MAST (Parts M, 145, 66, 147 and 21 subpart H)
Estonia, Belgium, Hungary, Latvia, Lithuania, Slovakia, Bulgaria, Slovenia, Iceland, Netherlands, Luxembourg, Italy, Portugal, Croatia, Turkey, Cyprus, Norway, Finland, Sweden

The international standardisation activity to third countries (also called MIST) has been re-launched and a visit to USA has been carried out.

The 2006 standardisation inspection programme for Initial and Continuing Airworthiness (POAST and MAST), as well as the 2006 international standardisation programme (MIST) was prepared and internally approved. 24 Continuing Airworthiness, 16 Initial Airworthiness and 6 International visits will be carried out in 2006. This is more than those initially planned, because of some non-scheduled ad-hoc visits.

Furthermore, the whole JAA standardisation archive for Initial Airworthiness and Continuing Airworthiness has been completely transferred to EASA, including electronic archives of findings. A provisional electronic archive and tool for the follow-up of new findings has been developed and is in operation. In addition, the preliminary study providing general specifications for a new database, which will have to cater also for the enlargement of the scope of the Agency in 2006/2007, has been carried out.

Finally, it was decided to promote a new pro-active approach by launching standardisation meetings with all NAAs, with the aim of providing a better

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[10] In accordance with the EASA-JAA Working Arrangement, signed on 1st November. 2004

understanding of the rules and a better way of implementing them. These meetings have started to take place with an initial scope limited to Part 66. It is foreseen to enlarge the scope in the future.

Standardisation efforts in 2005 have resulted in

- ✱ Consolidation of experience on coordination and procedures
- ✱ A better control of the compliance with the rules
- ✱ A number of non-compliance areas have been identified and corrective actions have been launched by Member States
- ✱ Identification of possible rulemaking activities

➢ Lessons learnt

In carrying out the standardisation visits we concluded that the scope of the visits was too large. For this reason it is foreseen that in 2006 the scope of the visits will be reduced in order to allow more in-depth inspections. The outcome will be an overall increase of visits per year, maintaining nevertheless the frequency of 24 months per scope per country. This has been labelled the so-called "intensive programme".

The two main issues of concern, resulting from the findings during the standardisation inspections, have been the continued operation of CIS-built (Commonwealth of Independent States) aircraft in some Member States, and with regards to the conversion of national qualifications to PART 66 licences.

➢ Promoting the quality of the work performed in the name of the Agency

"Accreditation" is the process of auditing the national aviation authorities in order to ensure that they can be allocated certain certification tasks by the Agency. The accreditation process of NAAs is regarded as part of the internal Quality Management of the Agency, even if the audits are actually performed by teams lead by the Standardisation Department. The major achievements of the Accreditation procedure and the relevant working instructions were finalised in July and they are both presently published on the Agency Website.

Accreditation Visits	
TC / STC	Ireland, Poland, Austria and Germany
DOA	Poland, Norway, Portugal, Denmark, Austria and Germany
POA	Czech Republic

➢ Promoting a uniform culture of safety through internal and external technical training

The definition of the internal training policy, together with the Human Resources department, is now complete. Five internal courses on Part 21 were carried out well ahead of schedule in 2005. Courses on Continuing Airworthiness are in development and will start in 2006, and the first one on Part M was run for testing. A complete internal catalogue has been developed and is under evaluation by the directorates.

In addition, an Agency-wide technical library was implemented through the acquisition of electronic publications made available to all staff through web access.

As regards the Agency's external learning system for aviation legislation, this was defined following a meeting with the stakeholders, and was accepted by the Executive Director and presented to the Management Board at the end of September. Another open meeting to all interested parties took place on 15 December to discuss the involvement of training providers within the Agency's proposed system.

1.3. Contributing to international aviation safety

1.3.1. Technical support to the Community and its Member States

The Agency actively supported the Commission in the four negotiation sessions it conducted with the United States with the view to concluding a future EU/US Bilateral Aviation Safety Agreement (BASA). In this context it was tasked to organise the work aiming at elaborating the technical elements of this agreement called the Implementation Procedures for Airworthiness (IPA) and the Maintenance Implementation Procedures (MIP). It also worked on a process allowing its extension to environmental protection.

The Agency was also deeply involved in the confidence building process required by the FAA as a prerequisite to the conclusion of this agreement. This involved a first assessment of the Agency's headquarters and of the National Aviation Authorities (NAA) of France, Austria and Spain. Certification projects have also been identified, which the FAA will shadow to get understanding of the way the Agency works and reach its certification decisions. Implementation of these "shadow projects" was immediately started.

In July 2005, the European Community and Canada finalised the text of the EU/Canada Bilateral Aviation Safety Agreement after several rounds of negotiation involving the Agency over the last two years.

1.3.2. Relationships with aviation authorities around the world

➤ **Working arrangements**

A new working arrangement with the General Administration of Civil Aviation of China (CAAC) on Dassault and Eurocopter products was signed and the drafting of a working arrangement for Airbus products initiated.

An implementation procedure for the validation of European products was added to the existing working arrangement with the Interstate Aviation Committee of the Commonwealth of Independent States. Furthermore, work on additional implementation procedures covering several specific programmes (Beriev 200, SaM 146, RRJ 95) was started.

The Agency started drafting working arrangements with New Zealand and with Australia, based on the results of the Airworthiness Review Team (ART) visits performed earlier in the year.

An arrangement was signed with the Israel Civil Aviation Authorities for the implementation of the Agreement between Israel and Italy concerning the airworthiness certification, approval or acceptance of imported civil aeronautical products and the acceptance of maintenance services.

Exploratory talks were initiated with Brazil with the aim to extend the existing working arrangement, subject to a positive advice from the Commission.

Exploratory talks with the Japan Civil Aviation Authorities on the terms of a working arrangement for European products were undertaken.

➤ **Technical co-operation**

The Agency received delegations from the aeronautical authorities of the United Arab Emirates, Qatar and Egypt to examine potential areas of co-operation and support them in improving their technical capabilities.

Discussions took place with the Singaporean Civil Aviation Authority to explore possible co-operation on the approval of their repair stations and the continuing airworthiness of European products used by Singaporean operators.

EASA participated in the initiation phase of the EU - South Asia and South East Asia /ASD co-operation projects aimed at enhancing co-operation and improving understanding of the European aviation safety system. In parallel, the Agency supported the ICAO Co-operative Development of Operational Safety and Continuing Airworthiness (COSCAP) North-Asia.

Additionally the Agency took part, with the Commission to an aviation summit, with China, in June.

The Agency was also called by the Commission to assist in the co-ordination of the technical assistance programmes of the Member States and the Community.

1.3.3. Support to Member States in respecting their international obligations

The Agency organised several meetings to support the Member States in preparing for the International Civil Aviation Organisation (ICAO) audit programme (USOAP). This included in particular the filling of the related questionnaire and checklists. Following notification by all Member states of the transfer to the Agency of all design related responsibilities, the Agency also had to conclude a Memorandum of Cooperation with ICAO allowing for its audit, which took place in November.

The Agency has set up a process for co-ordinating answers to ICAO State Letters addressing issues of Community competence and issued several recommendations to Member States.

The Agency provided technical support to the Commission in the ICAO Committee on Aviation Environmental Protection Steering Group and participated in its Working Groups on noise and emissions where, among other things, standards for supersonic transport aircraft, as well as possible changes to the standards and guidelines for environmental certification.

Finally, the Agency started working with professional organisations to define means for a better co-ordination and communication with stakeholders on international matters.

2. Establishing a transparent and open system of management

In 2005 the Agency started organising its management structure and philosophy more systematically, in order to develop its professionalism and to enhance performance.

A number of principles have been adopted and their implementation started throughout the year in all fields of activity, with the view to constantly improve existing processes and to continue strengthening the structure of the Agency itself.

2.1. Aiming for excellence

2.1.1. An integrated quality management system

The process for implementing a Quality Management System in the Agency was initiated in March 2005, and, from that perspective, most of 2005 was dedicated to setting up the legal basis and the framework for its implementation which will constitute an essential part of the 2006 (major milestones) and 2007 (fine-tuning) work programme.

Actual work started with the Quality Assurance department carrying out thorough research on Quality Management Systems and standards already being applied in industry and organisations similar to the Agency[11]. In the meantime, the definition of the Agency's documentation structure appeared as a pertinent starting point and this initial work led to an Executive Director Decision issued on December[12] and the structuring of the internal Agency Quality System for documentation.

It was agreed that the Agency's Quality Management System should be based on ISO 9001/9004, the EC ICS 24 (internal control standards) and CAF (Common Assessment Framework). The outcome of this work was the issuing of an Executive Director Decision in October[13]. As a first step in the implementation of the Quality Management System, data was and is being collected through an analysis of the actual situation in the different Directorates.

2.2. Risk assessment

The Executive Director recruited a risk specialist to ensure that the Agency's quality management system incorporates the necessary internal control mechanisms.

This Risk assessment manager/internal auditor took up his duties in January 2006. Nevertheless in 2005 the Agency initiated a process to build up an "integrated" management system which aims at providing a reasonable assurance for efficiently and effectively achieving the Agency's objectives and managing its resources. This system will fulfil the internal control standards developed by the Commission and the international ISO quality standard. Risk analysis will be fully part of this system.

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[11] Data was primarily collected from NAAs such as Civil Aviation Authority UK, LBA in Germany, DGAC in France, Civil Aviation Authority Sweden ; industry such as Airbus and other Agencies such as EMEA
[12] 2005/02/Q, establishing the Agency's QMS Documentation
[13] 2005/11/E, a "Project order for establishing the Agency QMS"

Preparatory work consisted of an analysis of the situation in each directorate regarding organisational and management issues (risk analysis, assessment and management included) and it has been performed by the team in charge of leading the project. In each Directorate, tools and procedures have been set up in order to mitigate critical risks, including those relating to financial issues.

This preparatory work forms a basis for developing and implementing in 2006 a more systematic and formalised way to analyse and assess risks.

2.2.1. Legal certainty

It is important that the Agency can operate with legal certainty and therefore the Legal Department has been involved in a wide range of administrative and operational issues. It handled over 250 requests for legal advice in 2005. Notably they have supported:

- The Executive Director on various decisions, revision of Management Board decisions and questions on public access to documents;
- The Certification Directorate on various issues relating to the implementing rules, Regulation 488/2005 on Fees and Charges, the service contracts with the NAAs, personal liability of Agency staff, and the Frequently Asked Questions (FAQ) logged on the website;
- The Rulemaking Directorate on the legality and regularity of its Opinions to the Commission, Notices of Proposed Amendments, Comment Response Documents and responses to Frequently Asked Questions;
- The Quality and Standardisation Directorate on ICAO USOAP, the FAA assessment and drafting of the Standardisation Regulation.
- The Administrative Directorate on issues relating to the Staff Regulations and the Financial Regulation, and building contract renewal.

2.3. Continuously improving

2.3.1. By focusing on customers

In addition to involving stakeholders in the definition of rules (see earlier), it is clear that the Agency's continuity of work depends to a large extent on the willingness of its stakeholders to support it, and from the understanding they have of its policies. This is the reason why during the course of 2005, stakeholders and partners were voluntarily involved in a number of working groups chaired by the Agency. Specific attention has also been paid to creating a number of forums to diffuse the Agency's position and to use all available channels to convey this information.

➤ **The formal working groups associating the Agency's stakeholders in its work**

Working Group	Task description	Group members	Deliverables
Advisory Group of National Authorities (AGNA)	Involvement in the rulemaking process,	National Aviation Authorities	
Safety Standards Consultative Committee (SSCC)	Involvement in the rulemaking process,	Interested Parties	
Fees & Charges (F&C)	Draft changes to F&C Regulation to provide increased income for EASA in 2006	Agency Industry members European Commission 4 NAA	Draft amended Commission Regulation
Work programme & Budget permanent working group	Draft the Agency's 'Statement of Estimates, Establishment Plan and Preliminary Work Programme'; draft the Agency's work programme and budget, in co-operation with representatives of the Management Board and the European Aviation Safety Agency Advisory Board and propose it for the Agency directors' approval;	Agency Management board representatives Interested parties representatives	Work programme for following year; quarterly assessment report for the Agency directors', draft previous year annual report
EASA/NAA Certification Transition Working Group ENACT	Monitor certification transition	Agency Management Board representatives NAAs representatives	

➤ **General meetings**

The Agency is organising general meetings with its stakeholders on a regular basis, be it industrial stakeholders or representatives from the NAAs. A successful Industry meeting was held in Cologne on 17 November, with over 200 participants representing all parts of the civil aviation sector. Key points of discussion included STC validations and EASA Fees and Charges. A date has already been set for next year's meeting (15.11.2006).

The International Aviation Safety Conference is an annual meeting, held in turn in Europe and in the USA. The 2005 edition took place in Cologne, and was the opportunity to meet stakeholders at world level and continue reflection on cooperation.

➤ **General communication**

The Agency received considerable media attention in 2005, notably during the second half the year. Unfortunately the crisis communication procedures were checked against reality, which helped to raise public awareness of the Agency's tasks and policies.

2.3.2. By addressing weaknesses

➤ **At business level: thorough audits by international regulators, and set up of a Board of Appeal**

The Agency being a new player in the field of Aviation safety, it had to demonstrate its capacity to maintain the existing level of safety, and it was therefore audited by the FAA and by the ICAO.

The first FAA assessment of the Agency was performed between 26 January and 3 February 2005. The purpose of being assessed by the FAA was determined by the desire to enter into a bilateral agreement between the US and EC that would provide for the reciprocal acceptance of findings for the certification of aeronautical products and repair stations. However, it needs to be noted that the EASA system includes several significant differences compared to the FAA system.

The FAA assessed 13 general areas[14] of which six remain open pending final EASA or Community actions. In addition, the FAA also performed assessments of several NAAs (ACG Austria, DGAC France, DGAC Spain and CAA Malta).

It was agreed to continue with this process and to have a second FAA assessment of the Agency around the end of the year, which was performed in February 2006.

The first ICAO audit, based on the Universal Safety Oversight Audit Programme (USOAP), was performed between 29 November and 2 December 2005. The scope of the ICAO safety oversight audits concentrated on the transfer of regulatory competencies in the fields of airworthiness, continuing airworthiness and environmental certification from Member States to EASA (EC Regulation No 1592/2002).

Seven findings were issued with regards to the civil aviation organisation (ORG) and nine findings raised with regards to airworthiness of aircraft (AIR). One finding relating to AIR was not accepted by EASA. The deadline for the corrective action plan has been set to April 2006. It is important to underline that Quality and Standardisation Directorate will be also systematically participating to ICAO visits as observers.

The contents of a bilateral agreement between ICAO and EASA, called Memorandum of Co-operation (MOC), was discussed and agreed in October 2005. However, it was agreed to sign this during the March 2006 ICAO Conference.

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[14] National legislation; Mission and mission priorities; Organization; Personnel (open); Delegation and/or oversight of NAAs (open); Enforcement (open); Communications; Working environment; EASA approval documents, EASA implementing rules, CS/AMC/guidance and policies (open); Design, production and airworthiness certification processes ("design" is open); Maintenance, facility, approval process; Certificate management/post design approval activities(open)

The contents of a bilateral agreement between ICAO and EASA, called Memorandum of Co-operation (MOC), was discussed and agreed in October 2005. However, it was agreed to sign it during the March 2006 ICAO Conference.

The Board of Appeal registry was open and a clerk appointed. However no case was raised to the Board of Appeal in 2005.

➢ **At administrative level**

The Agency has worked diligently through the year to improve its financial capacity, and to develop a system able to cope with the complex EU requirements for finance, procurement and budget.

This included the adoption of a full set of financial implementing rules, and the Agency has an agreed control framework to reduce risks of unsound financial management. A decentralised approach to financial management was also implemented; it assigns budget responsibility to operational managers[15].

The internal manual of procedures (the Fees and Charges Handbook) incorporates these financial controls. All new recruits are given an introduction to the rules during the induction training, and all financial actors follow a more thorough training programme.

In practical terms, this implied the training of staff, the set up of an electronic payment system in order to save time and to reduce the risk of error, and the implementation of a full set of documented procedures for procurement.

The European Court of Auditors conducted its first audit for the financial year 2005. The Agency is expected to reply to an interim report by the end of March before the second audit takes place in April 2006 and the final report is issued.

2.4. Going open book on Fees and Charges

2.4.1. A clear charging system

The entry into force of the Fees and Charges Regulation[16] in June 2005 was extremely challenging. It implied a complete re-organisation from various existing national charging schemes to a single scheme, entirely managed and monitored by the Agency, and due to fund all certification activities by the Agency.

From the Agency's perspective, it does not imply shifting from one existing system to another existing system, but shifting from a variety of systems to a single system, operated under the auspice of complex Community rules. Consequently, the implementation of the Fees and Charges Regulation has consumed a considerable amount of resources within all directorates in monitoring cash flow, dealing with concerns, suits and requests from applicants and dealing with the continuous management of contracts.

From the industry perspective, this implied shifting from systems to which they were used to, to an unfamiliar set of rules based on a cost-recovery system.

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[15] Chiefly for income and expenditure transactions relating to Regulation 488/2005
[16] EC Regulation 488/2005

As a result the Agency, in its entirety had to prove its flexibility and to closely monitor the implementation of the Regulation. It implied:

✱ Regular coordination meetings with involved departments and directorates
✱ Continuing improvement of existing procedures (revision of fees and Charges handbook)
✱ Further elaboration of IT tools, templates, forms and subsequent installation, training, publications
✱ Collection and analysis of statistical data already available
✱ Recruitment and training of necessary staff
✱ Processes to deal with the NAAs

2.4.2. Budget uncertainty through the year

➤ **Late entry into force of the Fees and Charges Regulation, and low level of fee collected**

The expected deadline for entry in force of the Fees and Charges Regulation moved from autumn 2004 to January 2005 to April 2005, finally being realised on 1 June 2005[17]

The fee income – while no Fees and Charges regulation existed yet – was expected to be 39.6 million euros during a 12 months' period, and instead the actual revenue collected from Fees and Charges turned out to be 8.6 million euros.

This was due to several facts, of which the most important are:

✱ the late entry into force of the Fees and Charges Regulation (June 2005 instead of the initially planned November 2004);
✱ lower than estimated volume of applications in some categories;
✱ the level of the established fees;
✱ average payment delays of more than 60 days.

In addition, the big difference between the budgeted and final revenue from the Fees and Charges Regulation is due to a different calculation basis. The original own revenue was calculated on an accrual basis (invoicing). Using the same principle of invoicing, the final revenue from F&C was 15.7 million in 2005 compared to the cash income of 8.6 million.

The own revenue actually collected from Fees and Charges during 7 months of implementing the F&C regulation was 21.65% of the income forecasted in the PDB for a full year. The invoicing during these 7 months reached 39.75 % of the income forecasted in the PDB for a full year.

If the PDB figures are adjusted to the actual implementing period of 7 months of the F&C regulation, the budgetary execution reached 37% and 68% respectively.

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[17] Another budget uncertainty, when drafting the 2004 preliminary budget for 2005 related to the fact that the Agency did not know what would be the building selected as its future headquarters. Therefore, it could not estimate the costs related to it.

➤ **The Agency had to review constantly its budget, and planning of activities**

Moreover the shift between the figures was not predictable, and several intermediate budgets had to be drafted during the year, leading to substantial uncertainty as regards to what activities could be funded and what other would have to cancelled, or even to changing working methods. This permanent uncertainty was one of the reasons why the Agency focused on its core missions and put a particular emphasis on maintaining the continuity of activities (see earlier).

Not less than 4 versions of the budget had to be produced during the course of 2005, in order to take into account the latest developments of the Fees and Charges Regulation.

The table below gives an overview of all budget versions for the year 2005 in comparison to the budgetary execution of 2004 and 2005.

Date	Estimated collected fee	Justification for the modification	Consequences of the modification for activities planned
30 March 2004 Preliminary Draft Budget for 2005	39,6 M€		
13 December 2004 Adoption of the budget	37,2M€	Modification of the Establishment Plan by the Parliament Entry into force of the Regulation scheduled for March 2005 Move to the new Headquarter, and higher rental and ICT and Software developments costs Contribution from third countries was pending the ratification of agreements* The subsidy from the German Federal Government needed to be included in the Budget	Downgrading of some posts Decrease of the amount dedicated to subcontracting certification work to NAAs Increase of Title 2 expenses in order to include costs related to the new building and subsequent IT; security, and telecom costs Increase of budget dedicated to the development of operational software applications (to manage the fees collected, the CRDs etc.) Increase of the budget dedicated to missions
1st June 2005 Draft amending budget	18, 1M€	Entry into Force of the Fees and Charges Regulation in June 2005 Adjustments of outsourcing expenditures to the levels agreed after the negotiations with them. Difference between the commitment appropriations and the cash to be collected	Reduction of expenses by some 7,9 M€ Reduction of outsourcing costs and reimbursements to NAAs Reduction of operational costs (missions expenses** etc) Reduction of ICT investments
29 September 2005 Amending Budget 2005	8 M€ (cash)	Fees and Charges Regulation was based upon estimates of applications too high for some activities Some of the fees levied through the fees and Charges regulation proved to be too low Inclusion in the budget of the remainders of the EC subsidy unused in 2003 and 2004	Cancellation of most research studies Decrease of ICT and software Investment Postponing some database developments Reduction of operational expenses The starting date of some 43 staff (Temporary and contract agents) was postponed to early 2006 while the recruitment was done in 2005
December 2005 Revised 2005 Budget			

* Liechtenstein, Norway and Iceland were negotiating their adhesion to EASA, and their financial contribution was pending at that time
* In order not to affect the continuity of activities, meetings were held directly in Cologne (with the consent of industry), or through

videoconferencing

2.4.3. The pressing need to revise tariffs

It was not unexpected that the Fees and Charges Regulation would have to be revised, and the text itself of the Regulation had provisioned for such a revision. Such a new scheme was deemed to be imperfect, and the industry, during the initial consultation had rightfully pointed out their will to have the Regulation reviewed after its entry into force. The level of uncertainty correlated to the level revision necessary. At the end of the year, it appeared that the revision was more than urgently needed, and that the levels of fees levied were highly insufficient.

The main issues were:

- The level of tariffs were not adequate to generate the income necessary to cover expenditures for certification tasks
- The complexity of the regulation and administrative requirements resulted in a high level of bureaucracy for both the Agency and applicants
- Active project management with NAAs during transition phase requiring high co-ordination efforts

An external study confirmed this analysis in the beginning of 2006[18].

At the beginning of 2006, it was agreed that two levels of revisions were needed: one urgent revision in order to allow the Agency to work in 2006 with less budgetary uncertainty. This revision of the Fees and Charges Regulation would levy Charges mostly on large industry. A second stage revision, to be undertaken afterwards would be dedicated to a longer term revision.

A dedicated working group has been tasked to analyse the situation and elaborate adequate proposals. These would be based upon revisions of the Regulation and its annex, not on the fundamental principles behind the scheme.

2.5.   Recruiting and retaining the best in Europe

2.5.1. A challenging schedule

Altogether the Agency completed 183 recruitment procedures in 2005. Of these 140 related to new vacancies in the establishment plan, and 43 to additional posts that became vacant due to unsuccessful recruitment procedures or resignations. The unsuccessful procedures mostly concerned administrative or support positions which often elicited very few applications from qualified candidates or resulted in the chosen candidate refusing to accept the Agency's conditions of employment.

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[18] Deloitte study

2005 Recruitments
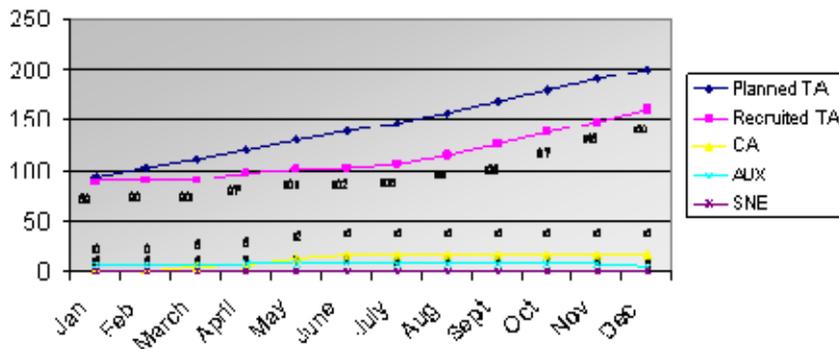
By the end of the year the Agency employed:

* ✳ 153 temporary agents, with a further 39 expected to take up employment in early 2006. The Agency has already advertised the majority of the vacancies authorised in the 2006 establishment plan.
* ✳ 16 contract agents in the Certification and Administrative Directorates. Contract agents are assigned to processing the financial transactions related to fee income and allocation of tasks to NAAs, the recruitment team and the reception. An additional four contract agents are expected to take up employment in early 2006.
* ✳ 7 auxiliary agents, these positions will gradually be replaced by contract agents in 2006.
* ✳ No national experts on secondment have been employed so far. This is largely due the fact that they are not employees of, and hence cannot represent, the Agency.

2.5.2. Wide advertisement of vacancies

Early warning had been sent by NAAs and by the industry to the Agency, on the difficulty to recruit aeronautical experts. The core problem is that in Europe the pool of potential candidates is small and the labour market extremely competitive. The certification strategy elaborated within the Agency takes into account these factors.

However, recruitment is a very long process, and delays encountered have sometimes caused a shifting of some envisaged task from one directorate to another, or delayed some activities; As a lesson learnt, recruitment for 2006 were started already in 2005, notably with the publication all aviation experts posts as provisioned in the 2006 establishment plan.

2.6.   Formulating an appropriate staff policy

The Commission has given its agreement to a first set of 39 implementing rules for the Staff Regulations out of an estimated total of 80. The second package of implementing rules, including recruitment procedures for contract staff, the rules on grading upon recruitment and external activities & assignments, and the Staff Committee regulation have been submitted to the European Commission for prior approval. In general the rules do not deviate significantly from those applied by the Commission.

The final package of implementing rules will be completed in 2006, and will set down policies on performance appraisal, promotion and training where a certain degree of personalisation is required.

As concerns the recruitment policy, the Agency works closely with the European Personnel Selection Office (EPSO) to make sure that it meets the expected standards of transparency in selection procedures.

Staff members have now elected a Staff Committee. As the official representative of the staff, the committee has an important role to play in policy decisions concerning personnel management, and in designing measures to achieve high standards of health and safety in the workplace. It meets regularly with the Executive Director on these issues, and is officially consulted before decisions are taken.

3.   Conclusion

➤ **A 2005 context largely placed under the auspices of the Fees and Charges Regulation.**

The new system founded by the Basic Regulation foresaw that all certification activities of the Agency were to be funded by revenues derived from the Fees and Charges Regulation. It was adopted in the first months of 2005 and entered into force in June. It was, by many means, a revolution from both the industry and from the Agency point of view: for the first time a harmonised charging scheme had been put in place, where in the past there was a superposition of national positions. The scheme was deemed to be perfectible. It implied a significant amount of work from the industry point of view, when they had to adapt their own production and their costs structure to new requirements. From the NAAs point of view, the change was neither negligible, as they had to perform tasks for the Agency, under its supervision, and charge the Agency. It is also worth mentioning, that Agency-wise, the entry into force of the regulation also generated profound internal changes: additional tasks for the team performing and supervising the work, an entire billing, charging and invoicing system had to be introduced in the process.

Such changes could have understandingly led to a disruption of the Agency's core business, but the highest priority was given to maintaining the continuity of activities and to ensuring the quality of the work.

➤ **Some continuous challenges...**

Avoiding any disruption of activity was certainly the main challenge of 2005, but it can be analysed as the end objective of several other operational challenges. The introduction of the Fees and Charges regulation has already been mentioned, but in addition, from an organisational point of view, the staffing of the Agency was certainly as time consuming. Early warnings had caught the Agency's attention as to the issue. Aeronautics is a domain where expertise is scarce and expansive. In addition, the Agency has been recruiting and operating in a start up context, building up its teams, creating its own experience and culture. It was a strong necessity to build up on experienced staff, and the recruitment in this first year focussed at the senior level so as to best disseminate experience throughout the Agency.

➤ **To be met through process and system approach**

By all means, 2005 was a year where complex challenges arose, and were met. A year in which processes were improved and deepened. A year where some teething problems were encountered, but in the end, the big picture is that of an Agency which has strengthened its position and capacity.

4. Annexes

4.1. 2005 activities as opposed to those set out by the work programme

➤ **E- Directorate in 2005**

Objectives set out in the work programme	Comment
Safety analysis and research Linkage with Accident Investigation bodies and answers to safety recommendations	An annual meeting was set up, and the necessary contacts were established, in order to answer safety recommendations in a timely manner. This system proved to be efficient during the August period, where the Agency could act as a coordination central point for the findings.
Article 11.4 safety report	The necessary information was collected, and a document has been submitted to the internal safety committee with the view of publishing the safety report in 2006.
Participation to SAFA / JSSI / CAST	The unit supported the transfer of the SAFA database from Central JAA to the Agency (within Q directorate) and is providing competencies for the analysis of the data. A strategy for transferring JSSI database to the Agency in 2006 The unit participated to several CAST meetings and coordinated the European participation to this committee, with the view of setting up a Euro-cast initiative in 2006
Communication Production of a multilingual brochure Quarterly newsletter Fact sheets on the Agency Revamp of Agency's web site Creation of an intranet Regular meetings with stakeholders	An important part of the work is related to ongoing tasks (general information within the Agency, update of website and intranet, contacts with stakeholders etc.) A number of deliverables were produced, such as a quarterly newsletter, the creation of an intranet. The Internet site could not be revamped because of a re-allocation of the funds to other projects
Internal Risk management Staff in place beginning of the year and production of quarterly reports	Arrival in post of the recruited staff in January. Part of the functions, related to Quality management were temporarily held within the Quality and Standardisation Directorate

Objectives set out in the work programme	Comment
Monitoring of activities and transversal coordination	Most of tasks assigned in this section of the 2005 work programme are on going tasks (directors meetings, follow up of the Fees and charges Implementation, work with EASA Advisory Board, secretariat of Management Board) and have been performed all through the year. The writing of some specific documents such as the budget and the work programme was done in close cooperation with industry and Management Board with the creation of a dedicated working group. Still, the team worked on a number of ad hoc issues, such as the Management of JAA Contract, the Secretariat to EASA / JAA/ FAA management meetings, organisation of industry meetings or Europe US Conference

➤ **C directorate in 2005**

Objectives set out in the work programme	Comment
Delivery of product certificates and approval of changes	Done. In total 8.000 Certificates and approvals were issued matching well with the expectations of the Work Programme 2005
Delivery of new organisation approvals	Done. 265 new approvals were issued slightly exceeding the workload expectations of the Work Programme 2005
Continuing Airworthiness activities	Done. Ongoing task. This activity resulted in 489 Airworthiness Directives mandated to TC holders
Surveillance of approved organisations	Done. Ongoing task
Implementation of DOA concept	Ongoing. 74 new DOAs were issued
Major programmes	All major certification programmes, including Airbus A380 and Boeing 787, successfully continued with no significant difficulties.
Internalisation of tasks	Ongoing process
Transfer of products to EASA	Ongoing process
Provision of technical expertise to other directorates and the Commission	The directorate actively participated in several rulemaking groups and supported the rulemaking directorate in the conclusion of new working arrangements. The directorate actively participated in standardisation and accreditation visits The directorate supported the Commission in several technical fields including revision of the Fees & Charges Regulation

Objectives set out in the work programme	Comment
Finalisation of the organisational structure	The principal organisational structure of the certification directorate was finalised. Future adjustments may result from continuous improvement processes and experience
Recruitment of experts	The recruitment of certification experts, including Project Certification Managers (PCMs) was successfully performed in accordance with the approved establishment plan. A total of 45 new certification experts and PCM joined the directorate
Establishment of EASA database and transfer from CJAA	Simple databases necessary to manage applications and approvals were developed as interim solutions until a professional and fully integrated EASA database is available.

A database provided by the commission for financial transactions and control (SI2) was adjusted and successfully implemented

Available databases from Central JAA were transferred to the Agency |
| **Completion of internal working procedures** | A first set of internal working procedures for the certification of products and approval of organisations was developed and implemented.

Based on own experience and assessments from external bodies a list of missing elements and more detailed working instructions were identified. |
| **Additional activities** | Industry meeting

Annual conference

Bilateral discussions with stakeholders

Fees & Charges WG

Transfer of eastern built aircraft |

➤ **R directorate in 2005**

Objectives set out in the work programme	Comment
Carry out 2005 RM work programme	Achieved 70% of programme implementation
Start work on developing rules for the implementation of the extended Regulation 1592/2002 for commercial air transport and flight crew licensing	The Commission legislative proposal on the extension of the Agency remit to air operations and flight crew licensing has been submitted to European Parliament and Council in November 2005. This delayed the initiation the work.
Start exploratory work as regards the safety regulation of airport operations and air traffic services	The Agency initiated work on the safety of airports essential requirements. Exploratory talks were held with EUROCONTROL and ATM community, to be continued in 2006.
Review quality of existing texts	The Agency submitted 4 opinion to the Commission amending Commission Regulations (EC) n° 1702/2003 and 2042/2003.
Prospective planning for 2006-2008	The Agency launched 29 of the 43 tasks contained in the advance planning.
Establish a research coordination committee	The current resources of the Agency do not permit taking over this task. The Agency decided therefore to participate in the JAA Research Committee.
Organise three workshops on identified implementation issues, amongst which one on the implementation of part M	The Agency organised 2 central and 7 regional workshops on Part M/-145/-66/-147 issues.
Conclude working arrangements with the aeronautical authorities if Australia, Israel and New Zealand	The Agency concluded working arrangement with Israel and started drafting the arrangements of Australia and New Zealand.
Initiate working arrangement negotiations with China and Japan	The extended working arrangement with China was signed. Talks were initiated with Japan, but progress was hampered by the cautious approach of our bilateral partner.

Objectives set out in the work programme	Comment
Assist the Commission in the negotiation of association agreements with ECAC States	The Agency has not been called to participate in the negotiation conducted by the Commission towards the European Civil Aviation Area.
Provide technical support to the Commission in the negotiation of bilateral aviation agreement	The Agency actively supported the Commission in the negotiation with Canada and the USA.
Initiate cooperation with aeronautical authorities of developing countries	The Agency had exploratory talks with 4 delegations to explore potential co-operation areas.

➤ **Q directorate in 2005**

Objectives set out in the work programme	Comment
Completion of familiarisation visit programme and report to the ED	It is expected that the Standardisation Regulation will be approved in 2006. The familiarisation programme regarding the standardisation regulation will therefore also be carried out following the approval of the Regulation, in 2006
Start and execution of an inspection programme	Notwithstanding the difficulties arising from the lack of a standardisation regulation and reduced human resources, the inspection programme was launched and carried out with success
Follow up of findings	The follow-up has been done consistently and according to established procedures. All findings and corrective actions are being followed up through an improved database, inherited from the JAA
Preparation of standardisation status report	The standardisation status report for 2005 was prepared ahead of schedule in February instead of the 2nd quarter of 2006
Approval of qualification standards and training programme for Agency's staff by February	Done. The Final Draft of the internal technical training policy was presented in April 2005 (and finalised in February 2006)
Setting up of a training system, including a training manual by February- June	Done. The interim training Manual was prepared in April. The final manual will be prepared following the implementation of the Agency-wide exercise regarding the training map
Training outsourcing contract by June 2005	Done. Potential external training courses were identified in the Interim Training Courses Catalogue but no specific need as yet to be identified
Setting up of first training on technical issues 2nd semester	Done. Internal Technical Training was started ahead of schedule in April.

Objectives set out in the work programme	Comment
Setting up a training programme for external stakeholders/ December	Done. The external training policy was re-evaluated and altered taking into consideration internal and external inputs (April to August). The selected system was presented to the Management Board in September
Drafting a Quality Manual by April 2005	Ongoing. The drafting of the Quality Manual, originally presented in the first half of the year, was finalised and approved in December
Setting up a quality system by April-June	Done. Research was carried out regarding identification of needs, identification of applicable standards and norms, possible use of existing Quality Management systems and the definition of methods to be used through workshops
Quality system internal approval by the end of June 2005	Done. Following the objective above, an ED decision was issued in November
Starting internal auditing activities and follow up (2nd semester 2005)	Pending. Due to the delay in the approval of the quality management system the internal audit activities started beginning of 2006
Preparation of the First biannual Management Quality system review report	Postponed due to the delay in the approval of the quality management system.
Additional activities	
Standardisation meetings	New pro-active approach with the launch of standardisation meetings with all NAAs
Participation in workshops	Systematic participation to all Rulemaking Directorate's workshops on PART 145 and PART M
Technical Library	Implementation of an Agency-wide technical library by acquiring electronic publications made available to all staff through web access

➤ **A directorate in 2005**

Objectives set out in the work programme	Comment
Recruitment of all positions provided for in the establishment plan	Altogether the Agency completed 183 recruitment procedures in 2005. Of these 140 related to new vacancies in the establishment plan, and 43 to additional posts that became vacant due to unsuccessful recruitment procedures or resignations.
Define HR policies on recruitment, performance, assessment and promotion	The Commission has given its agreement to a first set of 39 implementing rules for the Staff Regulations out of an estimated total of 80. The second package of implementing rules, including recruitment procedures for contract staff, the rules on grading upon recruitment and external activities & assignments, and the Staff Committee regulation have been submitted to the European Commission for prior approval. In general the rules do not deviate significantly from those applied by the Commission.

The final package of implementing rules will be completed in 2006, and will set down policies on performance appraisal, promotion and training where a certain degree of personalisation is required.

As concerns the recruitment policy, the Agency works closely with the European Personnel Selection Office (EPSO) on a daily basis to make sure that it meets the expected standards of transparency in selection procedures.

Staff members have now elected a Staff Committee. As the official representative of the staff, the committee has an important role to play in policy decisions concerning personnel management, and in designing measures to achieve high standards of health and safety in the workplace. It meets regularly with the Executive Director on these issues, and is consulted officially before decisions are taken. |
| **Provision of suitable European schooling facilities in Cologne** | The Agency has met several times with representatives of the City of Cologne to discuss schooling arrangements to address the needs of its staff, and notably the establishment of an equivalent to the system of European Schools. Since the issue is complex the Agency has undertaken to provide more detailed information on the requirements of its staff. |

Objectives set out in the work programme	Comment
Review of Agency's Financial Regulation and related implementing Rules	In accordance with the Financial Regulation the Agency moved in 2005 from a cash basis to an accrual basis for general accounting. This entailed a considerable amount of additional reconciliation work for the accounting team, but the accounts for 2004 were established on an accrual basis. At its meeting in June the Management Board adopted a full set of implementing rules for the Financial Regulation.
Assessment of financial management risks and establishment of the necessary internal control mechanisms	The Executive Director has recruited a risk specialist in his office who will make sure that the Agency's quality management system incorporates the necessary internal control mechanisms.
Review and implementation of financial workflows and circuits	Following the adoption of a full set of financial implementing rules the Agency has an agreed control framework to reduce risks of unsound financial management. This framework forms the basis for the decentralised approach to financial management which now assigns budget responsibility to operational managers, chiefly for income and expenditure transactions relating to Regulation 488/2005. The internal manual of procedures (the Fees and Charges Handbook) incorporates these financial controls. All new recruits are given an introduction to the rules during the induction training, and all financial actors follow a more thorough training programme. In order to improve the payment transactions the Agency has set up an electronic payment system linked to the general accounting system that allows payment instructions to given to the bank electronically. This saves time and reduces the risk of error. In addition there is an enhanced reporting tool to give information on accounts receivable.

Objectives set out in the work programme	Comment
Provisional paper-based procurement workflows and systems, and initial work on an electronic system	The Agency now has a full set of documented procedures for procurement of goods and services. For contracts above €13,800 the procedures are handled by a specialised internal procurement team within the Legal Department; other contracts are tendered directly by the authorising officer, advised by the procurement team. The Legal Department's procurement team has focused largely on establishing the procurement procedures and the team of staff to manage them. Contracts for security services and cleaning have been concluded and calls for expression of interest launched for the Certification Directorate, Rulemaking Directorate and ICT & Technical Services Department. In addition, the team was involved in setting up the contractual framework for the Service Contracts with the NAAs.
Establishment of an Advisory committee on procurement and contracts	Since this committee has been removed from the financial implementing rules of the Institutions it was decided not to establish such a committee. This decision was in line with the advice given by the external auditors.
Finalisation of invoicing system for Fees and Charges	Operational since June 2005.
Extend infrastructure and ICT services to accommodate the additional staff	The Agency took over the 15th and 16th floors in the tower in mid-November once the ICT infrastructure had been installed, and furniture donated by the authorities of North-Rhein Westfalia had been delivered. The office of the Executive Director and part of the Certification Directorate has already moved to the new floors. The Agency will take over the 9th-14th floors during 2006, which requires the further development of security and emergency procedures.
Back up internet connection	It now also has a full set of back-up servers which allows internal replica servers to take over in case of failure of the main servers. The external fail-over solutions will be studied in detail during 2006, although it is clear from the outset that an external solution has to be found to guarantee business continuity.

Objectives set out in the work programme	Comment
Support the development of operational databases and set up of an electronic document management system	Having recruited a small core group of temporary agents and consultants in 2005, the Software Development Section started work on the wide range of IT projects requested by the directorates. The first of these is a tool to support the comment response process which is under final testing in the Rulemaking Directorate. It is expected to be operational early in 2006. Other operational projects, notably a certification management system and the electronic document/workflow management system, have suffered from the limited availability of appropriate staff and the fact that functional specifications are only now becoming clear. These projects will be continued in 2006.
Development of E administration	In 2005 the Executive Director established an information and communication technology committee (COMINFO). The role of COMINFO is to direct major investments in information and communication technologies so that they support the strategic objectives of the Agency. The Agency has strengthened its network security considerably this year by implementing isolated and secured network zones that prevent unauthorised access to internal information resources. Network components are configured to run in a total fail-over mode. For its visitors, the Agency provides connectivity to the Internet via wireless facilities disconnected from the Agency's internal network. On the administrative side incremental improvements were made to support financial transactions and mission procedures through the introduction of electronic payment and general ledger software and the Commission's suite of SIC applications. In 2006 the aim will be to integrate all the administrative systems to reduce the risk of error and improve reporting.
Legal service	The Legal Department has been involved in a wide range of administrative and operational issues handled over 250 requests for legal advice in 2005.
	The Agency has now set up the registry's procedures for the Board of Appeal, and provides support to the Board through the registrar. At the end of 2005 the registrar planned a kick off meeting with the Board to discuss remaining administrative issues. The meeting was held early 2006.

Objectives set out in the work programme	Comment
	In view of the time-consuming procedures for granting individual VAT exemptions, the Agency has requested the right to certify itself as VAT exempt, as is the case for many other agencies. If permitted by the German authorities, self-certification would mean considerable efficiency gains in sending order forms to suppliers, including the NAAs, and would further reduce the workload related to invoicing. The Agency has put into operation a new inventory system that allows physical assets to be recorded by scanning bar codes. All physical assets are now in the system, but the calculation of accrual values required by the accounting system is still ongoing.

4.2. Declaration of Assurance from the Authorising Officer

I, the undersigned, Patrick Goudou, Executive Director of the European Aviation Safety Agency, in my capacity as Authorising officer, declare that the information contained in this report gives a true and fair view[19].

I state that I have reasonable confidence that the resources assigned to the activities described in this report have been used for their intended purpose and in accordance with the principle of sound financial management, and that the control procedures put in place give the necessary guarantees concerning the legality and regularity of the underlying transactions.

This reasonable assurance is based on my own judgement and on the information at my disposal, such as the validation of EASA systems by the accountant, the results of different audits carried out at the Agency and the lessons learnt from the reports of the Court of Auditors for years prior to the year of this declaration. I confirm that I am not aware of anything not reported which could harm the interests of the institution.

The following context is to be noted:

The Agency has made, over the last three years, significant efforts to manage its start up period. In this context, the Agency has implemented generic systems (such as SI2 for budget issues, BOB for general accounting issues...) or developed its own tools (the invoicing system). These generic systems give some assurance about mitigating major risks and constitute therefore a fundamental element for the Agency's internal control system. Nevertheless, in the specific context of the Agency (new invoicing activity, the Fees and Charges regulation…) they have showed their limitations. This is why the Agency now enters into a new phase of consolidation and is willing to design an integrated system which will improve the quality of information and facilitate the supervision and monitoring of activities.

Place .... Date ....

Signature

Patrick Goudou, Executive Director of the European Aviation Safety Agency

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[19]   True and fair view in this context means a reliable, complete and correct picture of the state of affairs in the service.

4.3. Agency Staff in 2005

2005 Recruitments
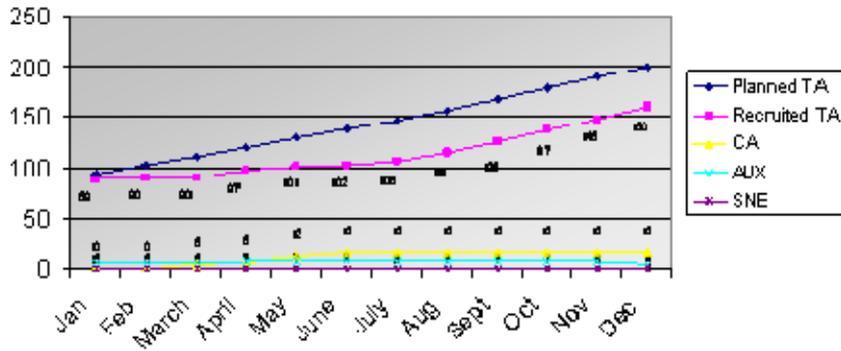
Nationality Distribution
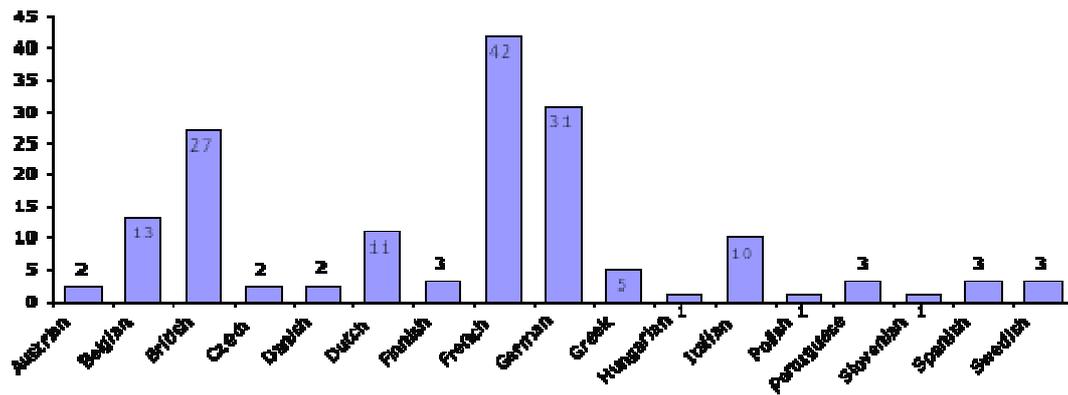
Gender Distribution
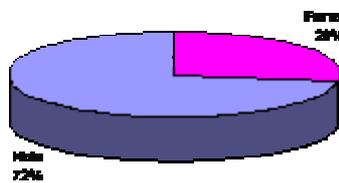
Age Distribution
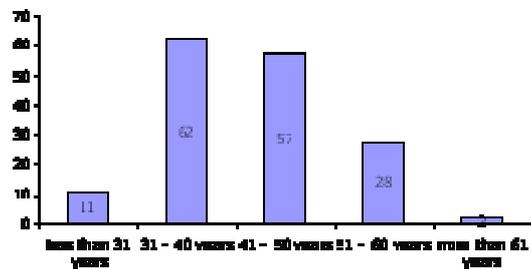
4.4. Budget information

➤ **The variations in the 2005 budget**

	B2004 Implementation	PDB2005 30.04.04	B 2005 14.12.04	Amending B 2005 27.09.05
Revenue				
Own revenue	0.00	39,570,000.00	37,200,000.00	16,400,000.00
EC subsidy	11,050,000.00	18,930,000.00	18,930,000.00	18,930,000.00
	0.00	0.00	0.00	3,207,881.00
Third countries contribution	0.00	945,000.00	p.m.	p.m.
Other revenue	247,770.07	300,000.00	1,344,000.00	1,443,119.00
TOTAL	11,297,770.07	59,745,000.00	57,474,000.00	39,981,000.00
Expenditure				
Title 1	6,000,420.81	18,390,000.00	18,250,000.00	16,189,000.00
Title 2	2,059,868.51	2,150,000.00	4,202,000.00	3,618,000.00
NAA subcontracting	0.00	34,105,000.00	25,315,000.00	16,400,000.00
Operational software development	0.00	400,000.00	1,495,000.00	622,000.00
Other Title 3 expenditure	937,464.26	4,700,000.00	8,212,000.00	3,152,000.00
Title 3	937,464.26	39,205,000.00	35,022,000.00	20,174,000.00
TOTAL	**8,997,753.58**	**59,745,000.00**	**57,474,000.00**	**39,981,000.00**
Outturn for the financial year	2,300,016.49			
Cancellation of unused carryovers	972,937.39			
Balance of the outturn account for the financial year	**3,272,953.88**			

➤ **Budget implementation**

BUDGET IMPLEMENTATION 2005	2005		2004
TITLE I - Staff expenses	**Payments**	**Commitment**	**Commitment/ Payments**
Budget appropriation (1)	16.191.637,00	16.191.637,00	7.807.522,00
Committed		13.967.417,73	6.000.420,81
Paid	13.753.781,90		5.685.938,27
Automatic carryovers	213.635,83		314.482,54
Total expenditure (2)	**13.967.417,73**	**13.967.417,73**	**6.000.420,81**
Cancelled	2.224.219,27	2.224.219,27	1.807.101,19
% used on budget appropriation (1)-(2)	86,26%	86,26%	76,85%
TITLE II - Administrative expenses			
Budget appropriation - C1+R0 (1)	3.691.372,00	3.691.372,00	2.538.891,28
Committed		3.428.326,47	2.059.868,51
Paid	2.646.603,36		1.250.342,53
Automatic carryovers	781.723,11		809.525,98
Total expenditure (2)	**3.428.326,47**	**3.428.326,47**	**2.059.868,51**
Cancelled	263.045,53	263.045,53	479.022,77
% used on budget appropriation (1)-(2)	92,87%	92,87%	81,13%
TITLE III - Operating expenses			
Budget appropriation (1)	11.697.991,00	20.097.991,00	991.000,00
Committed		13.864.567,79	937.464,26
Paid	4.656.234,18		673.596,73
Automatic carryovers	1.276.516,92		223.867,53
Non-automatic carryovers	4.334.432,51		40.000,00
Total expenditure (2)	**10.267.183,61**	**13.864.567,79**	**937.464,26**
Cancelled	1.430.807,39	6.233.423,21	53.535,74
% used on budget appropriation (1)-(2)	87,77%	68,98%	94,60%
TOTAL			
Budget appropriation - C1+R0 (1)	31.581.000,00	39.981.000,00	11.337.413,28
Committed		31.260.311,99	8.997.753,58
Paid	21.056.619,44		7.609.877,53
Automatic carryovers	2.271.875,86		1.347.876,05
Non-automatic carryovers	4.334.432,51		40.000,00
Total expenditure (2)	**27.662.927,81**	**31.260.311,99**	**8.997.753,58**
Cancelled	3.918.072,19	8.720.688,01	2.339.659,70
% used on budget appropriation (1)-(2)	87,59%	78,19%	79,36%

➤ **Draft budget outturn account**

DRAFT BUDGET OUTTURN ACCOUNT 2005	2005	2004
Own Revenue	15.730.769,48	
Commission subsidy	18.930.000,00	11.050.000,00
Ministry of Transport of the FR of Germany contribution (ear-marked revenue)	1.425.000,00	247.770,07
Third countries contribution	399.423,00	
Administrative Operations	46.604,54	
Total revenue (a)	36.531.797,02	
Revenue not collected (b)	7.561.101,41	
Total revenue collected (a-b)=(c)	**28.970.695,61**	**11.297.770,07**
Expenditure		
Personnel expenses - Budget title I		
Payments	13.731.241,10	5.685.938,27
Payments (earn-marked revenue)	22.540,80	
Automatic carryovers	213.635,83	314.482,54
Administrative expenses - Budget Title II		
Payments	1.245.255,28	1.002.572,46
Payments (earn-marked revenue)	1.401.348,08	247.770,07
Automatic carryovers	781.723,11	809.525,98
Non-automatic carryovers		
Operational expenses - Budget Title III		
Payments	4.656.234,18	673.596,73
Automatic carryovers	1.276.516,92	223.867,53
Non-automatic carryovers	4.334.432,51	40.000,00
Total expenditure (d)	**27.662.927,81**	**8.997.753,58**
Outturn for the financial year (c-d)	**1.307.767,80**	**2.300.016,49**
Cancellation of unused carryovers	208.149,69	1.186.872,48
Balance carried over from year N-1		-213.581,18
Exchange differences for the year	-2.890,56	-353,91
Balance of the outturn account for the financial year	**1.513.026,93**	**3.272.953,88**
Interest on the EC subsidy to be reimbursed to Commission	144.940,97	56.717,62

➤ **Draft Profit and Loss Statement 2005**

DRAFT PROFIT AND LOSS STATEMENT 2005	2005	2004
Recuperation of expenses (job tickets)	25.636,34	3.271,87
Revenues from administrative operations		
From third parties	1.445.968,20	247.770,07
From EC entities	17.416.973,07	7.777.046,12
Other operating revenues		
Fees and Charges revenue	10.887.941,04	
From third parties (donated assets)	293.089,90	350.423,66
From EC entities (EFTA contribution)	399.423,00	
TOTAL OPERATING REVENUES	**30.469.031,55**	**8.378.511,72**
Administrative expenses		
Staff expenses(62)	-13.636.381,48	-5.556.563,42
Buildings and related expenses(61)	-2.121.171,60	-689.697,68
Other expenses(61)	-1.319.182,15	-742.818,33
Depreciation and write offs(63)	-575.735,75	-88.747,34
Operating expenses		
Other operating expenses		
From third parties (60)	-11.659.921,61	-2.080.725,43
TOTAL OPERATING EXPENSES	**-29.312.392,59**	**-9.158.552,20**
SURPLUS/ (DEFICIT) FROM OPERATING ACTIVITIES	**1.156.638,96**	**-780.040,48**
Financial operations revenues		
From third parties	41.473,99	143,60
Financial operations expenses		
From third parties	-14.333,60	-2.425,92
SURPLUS/ (DEFICIT) FROM NON OPERATING ACTIVITIES	**27.140,39**	**-2.282,32**
SURPLUS/ (DEFICIT) FROM ORDINARY ACTIVITIES	**1.183.779,35**	**-782.322,80**
Extraordinary gains		
Extraordinary losses		
SURPLUS/ (DEFICIT) FROM EXTRAORDINARY ITEMS	**0,00**	**0,00**
ECONOMIC RESULT OF THE YEAR	1.183.779,35	-782.322,80

➤ **Establishment Plan 2005**

Grades	Est. Plan. 2005	staff on 31/12/2005
A*16		
A*15	5	4
A*14	10	1
A*13		5
A*12	20	18
A*11	28	11
A*10	28	8
A*9	17	32
A*8	17	18
A*7	20	14
A*6		5
A*5		1
Total A*	145	117
B*11		
B*10		
B*9		
B*8		
B*7	8	
B*6	8	2
B*5	9	3
B*4		5
B*3		2
Total B*	25	12
C*7		
C*6	1	
C*5	1	
C*4	8	
C*3	10	6
C*2	10	13
C*1		5
Total C*	30	24
Total TA	200	153