



**EASA**  
European Aviation Safety Agency

# EASA Level of Involvement (LOI) project

Peter Corbeel  
Regulations & certification policy section manager  
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- Objectives
- Main Principles
- Rulemaking
- Guidance Material
- Applicability to GA



# Main Objectives

- Comply with ICAO Annex 19: State safety management: risk based oversight
- Codify risk based approach in product certification
  - threat: a non-detected non-compliance
- Consistent LOI, based on (safety risk) criteria
- Improve integration of product certification with DOA oversight



# Additional objectives of NPA

- Alignment with Basic Regulation
- Separate requirements for applicant from requirements for authority
- Improve Part 21 related to product certification



# Main Principles

- Builds on certification programme
- Defines Agency's responsibility in product certification
- Confirms responsibility of applicant
- Codifies current practice
- creates legal certainty/protection



# Main Principles

- Level of involvement = selection of the compliance demonstration items that the Agency will investigate and the depth of those investigations
- Criteria for establishing LOI:
  - Novel or unusual features
  - Criticality of design
  - Performance of DO
- TC issued when
  - Applicant has declared compliance
  - Agency has not found any non-compliance



# Main Principles

- Possible new DOA privilege:  
When DOA has shown capability in similar project
  - Approve non-significant major changes
  - Issue STCs (non-significant)
  - Approve any major repair



# Rule development process so far

- TOR + concept paper (including proposed changes to Part-21) issued 27-08-2013
- Agency task, but in consultation with LOI industry group (14 meetings held)
- NPA 2015-03 with rule and main AMC/GM: issued 2 March 2015
- 345 comments from 38 commenters
- Comments generally positive





# Schedule

- Comment response work ongoing by Agency with help from LOI industry group
- Opinion: 1Q 2016
- guidance material:
  - Certification Memos (CM)
  - Internal Agency procedures (WI)using experience from pilot projects to be issued in coming months



- WI: DOA dashboard to define EASA oversight
  - IT tool: DOA scoreboard
- WI: Decision process for the determination of LOI

### 3. **DECISION PROCESS FOR SIMPLE PROJECTS**

The decision process is the same for all simple projects, whatever the product:

	Minor design change, repair	Simple projects
Applicant	Reserved for future use	Proposes (P)
Expert		Reviews (R )
PCM		Decides (D)
Senior Expert		R (escalation)
HoS of the product line		D (escalation)
Chief expert		
HoD of the product line		



# LOI guidance

## ➤ 2 CMs:

- Generic criteria for establishing LOI
- form supporting the decision of the Agency on its LOI





More guidance needed:

- domain specific guidance on novelty and criticality

When CMs mature: include in AMC/GM



## ➤ LOI : 4 classes

- Level Z: familiarisation and cert programme review
- Level L: cert programme and cert plans acceptance
- Level M: L + some detailed test plans acceptance and certification summary acceptance
- Level H: M + some certification reports acceptance or witnessing or participation in some tests



# Applicability to GA

- Rule also applicable to AP-DOA and ‘certification programme only’
- But:
  - First get LOI working for DOA
  - Principles of guidance can also be applied to AP-DOA and CP only
  - Next step: adapt guidance
  - Future: rulemaking task ‘Part-21 light’



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**Thank you**

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