



EASA

European Aviation Safety Agency

Product Certification and Design Organisation Approval Workshop

22nd – 23rd November 2017

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General Aviation (GA) roadmap update and PART21 proportionality

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22/Nov/2017

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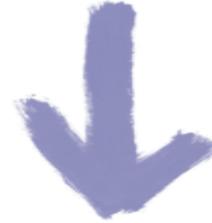
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Motivation and problem



Avert a dramatic loss of activity as a result of complex and disproportionate rules



Necessary to adopt a specific new approach for GA in order to assure a sustainable development of the sector in Europe



Founded on:

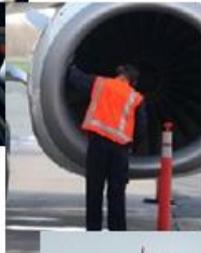
1. Agreed risk hierarchy
2. Agreed strategic principles
3. Cooperation of all stakeholders
4. Commitment at all levels

This foundation gives us a higher chance for success!!



Risk hierarchy

Active application of risk hierarchy



More protection



More freedom



Better, more effective rules





Strategic direction - six principles

P1: One size does not fit all (reduce cliff-effect)

P2: Philosophy of minimum necessary rules

P3: Adopt a risk-based approach (risk-hierarchy)

P4: Protect “grandfather rights”

P5: Apply EU “Smart Regulation Principles”

P6: Make best use of available resources/expertise



Cooperation of stakeholders



Member States



Success when
all partners
work together



GA users/industry



Commitment at all levels



Simpler, lighter and better rules to stimulate GA:

- Regulate only when needed and use other means when possible
- Hand responsibilities back to people/organisations that are able to take that responsibility
- Avoid automatic use of “CAT logic” to GA



Simpler, lighter, better rules for GA



Changes to the Basic Regulation: 2018: On-going



Part M Light: Opinion published in May 2016



Facilitate access to IFR (holistic approach across domains): NPA published in November 2016



Aircraft changes and repairs made easy (CS-STAN): Amendment 2 published in April 2017



More options for pilot training outside ATO (DTO): NPA published in December 2016



Air Operations and licence Balloon Rule Book: Opinion published in January 2016



Air Operations and licence Gliders Rule Book: Rulemaking task on-going



LAPL Medical Certificate: Done (Needs Safety Promotion)



Modular LAPL: On going



Simpler Certification (Part 21 proportionality – manufacturer approval): AMC planned for Q4/2017



Reorganisation of CS-23 using Industry standards: April 2017

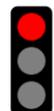
We are delivering in accordance with our commitments



Simpler, lighter, better rules for GA (cont'd)



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Reorganisation of CS-23 using Industry standards: April 2017

****Commission's process in progress***



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Simpler Certification

Part 21 Proportionality

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Part 21 Proportionality

Objective:

- Introduce flexibility and simplification in Part-21 certification for small organisations designing simple products (Gliders manufacturers, LSA, small CS23...)
- Practically combine different approvals (DOA/POA/MOA) for these small companies
- Make sure it can be adjusted since no company in GA is alike



Challenges to the initiative

- The current system; rules & culture are suitable for large organisations and aircraft
E.g Oversight aims at compliance to the rules (checking procedures) instead of risk/safety objectives
- Combining POA, DOA and MOA means putting NAA/EASA responsibilities and different rules together
- This is a shift in culture, processes and cooperation between all stakeholders



What is going on?

A Task Force is working on:

- Phase 1: Development of documents (Draft AMC) that show how the current Part-21 can be made workable for smaller companies (2017 Q4)
- Phase 1A: Test this in a pilot project (2018 Q1)
- Phase 2: Proposing a fundamentally new Part-21L consisting of objective rules supported by flexibility in the AMC (Start 2018 Q1)*

* Depending on the Basic Regulation changes and progress



EASA using a Task Force (sounding board & think tank).

Task Force (TF) members:

- National authorities (LBA, DGAC-F, FOCA)
- Manufacturers (sailplane, GA)
- (Non-)Users (Europe Air Sports)



Terms of Reference (ToR) key words:

- Flexibility and simplification
- Proportionate to the risks
- Performance based
- Pragmatic implementation
- Redistribute responsibilities



With this ToR, the Task Force pursues three initiatives:

Step 1: Develop alternatives to Part-21 AMC/GM for smaller companies for:

- Subpart G – POA
- Subpart J – DOA

Step 1A: Test these new AMC in pilot cases

Step 2: Develop a new approach for Part-21(Light)

- Implementing Basic Regulation updates



Step 1 –

AMC-European Light Aircraft



Step 1 – Developing (draft) AMC-ELA to Part-21

- Organise a dedicated focussed consultation workshop with stakeholders to get feedback
 - Refer to [EASA website/Events](#)
 - Draft AMC is available for comments in the EU Survey
- Consultation with stakeholders and Competent Authorities via the advisory bodies (STeB and GA Sectorial team).
- Direct publication of a Decision

Step 1 AMC (The workshop 9-6-2017 main focus)

Develop new Part-21 AMC/GM for:

- A specific scope:
- Limited to **Design and Production** organisations
- Within the possibilities of the current rules (Part-21)

Using this workshop as public consultation instead of via an **Notice of Proposed Amendment**

Today there are three main problem areas:

-  Existing AMC/GM to Part-21 is written for large aircraft and companies; especially POA is lacking alternatives
-  Non-natural split between approvals for DOA & POA (and Maintenance) of small, consolidated teams
-  Part-21 Section B (Procedures for competent authorities) mandate a process-oriented approach

How to improve the situation:

- Ensure common sense for small companies:
 - Know for every specific means why it is requested
 - Ensure that general means required are really necessary to meet the requirement
 - Define the means so that it serves the intent

Applying this in a strict way makes numerous elements unrelated for companies designing and producing small aircraft.

Step 1 – Developing (draft) AMC-ELA to Part-21 (cont'd)

Besides rulemaking this requires....:

→ A Cultural Change!!

- A change towards product oriented surveillance, instead of today's process oriented approach.
- A change towards utilisation of other influences to companies, instead of duplicating aspects
- A change towards integrated assessments, instead of individual certificates
- A change towards partnership and trust, instead of hierarchy and suspicion



As an example
Step 1 – AMC-ELA
for
Subpart G (POA)

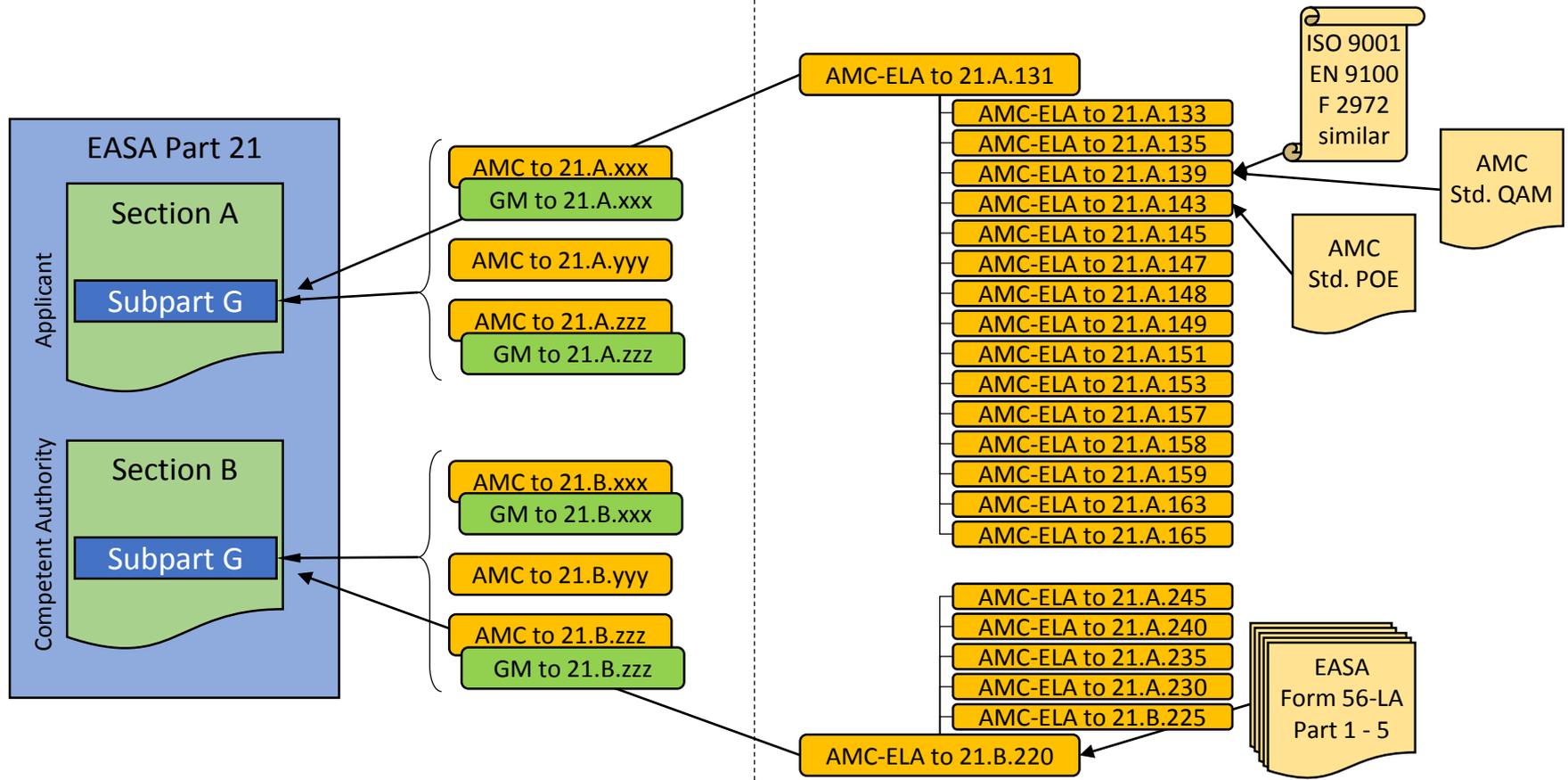


21.G – Spirit of AMC-ELA for small POA (Step 1)

- Apply product-oriented surveillance instead of process-oriented
- Significantly tailor the extent of documentation of the Quality System
- Make use of “practiced methods” in many areas - demonstration of repeatable procedures by evidence of work results is enough
- The competent authority oversight will focus on work results instead of process overhead verification



21.G – System of AMC-ELA



Existing – applicable to all products

New – applicable to products level 1 & 2

Note: „ELA“ relates to light aircraft in a much wider scope than ELA 1/2



Spirit of AMC-ELA for small POA (Step 1/A)

- The AMC explains what is needed for a small company
- The template handbook reflects the pragmatic bare minimum to meet the requirements
- The Competent Authority explains the spirit of oversight (Not new for some) and provides a “standard” and amended checklist
- Pilot projects are intended for verification of the AMC and approach
- This AMC-ELA will have a short life since changes will occur from the implementation of the new BR (Step 2)



Step 2 – Updated Part-21 based on new BR (Start 2018?)



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Thank you

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