



EASA

European Aviation Safety Agency

Update on initial airworthiness rulemaking issues

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STC WORKSHOP

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Content

- Update on Part-21 rulemaking activities
- How can I contribute?
- How does EASA interpret the rules outside of AMC/GM material?



Regulatory changes in the past 12 months

Reg 748/2012 (Part-21)

- no amendment of Part-21
- no new opinion submitted to European Commission
- Pending opinion(s) for preparation of regulatory changes:
 - RMT.0262 Level of Involvement (LOI)
 - RMT.0225 ageing aircraft (Part-26 opinion, but with minor amendment to Part-21 to link it to Part-26)

AMC/GM to Part-21

- amended by EDD 2017/024/R (14.12.2017) through RMT.0031 (regular update)
 - GM 21.A.101: revision of the advisory material on the basis of the CIT work
 - AMC to Appendix XII and 21.A.143, 21.A.243, 21.A.14(b), 21.A.112B(b) and 21.A.432B(b): Lead Flight Test Engineer (follow up of A-NPA on RMT.0583)



Highlights upcoming changes

Decisions upcoming

- RMT.0689 Part-21 proportionality (Phase 1) – introduction of proportionate AMC/GM to Part-21

Consultations recently closed

- RMT.0018 Parts without Form 1 (NPA 2017-19)
- RMT.0262 Level of Involvement (LOI) – proposed AMC/GM to Part-21 changes (NPA 2017-20)
- RMT.0252 Instructions for Continued Airworthiness (NPA 2018-01)

Ongoing consultations

- none






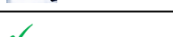
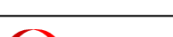

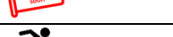
Upcoming consultations

- RMT.0251 SMS (Q3/2018)



Overview RMTs affecting Part-21

- The overview on the next slide is an extract from the rulemaking programme as shown in the EPAS 2018-2022
- Note:
 - The RMP published on EASA website reflects the draft presented to the MB (status mid Nov)
 - the below is already an updated plan (status end Jan)
- Abbreviations, signs and symbols used ...

	Strategic task
	Important task
	Standard task
	Regular update task
	Harmonisation with bilateral partners
	Delivery completed
	Delivery postponed
	Technical work completed, delivery ahead
	Use of Art. 15 or Art. 16 procedure

ToR	Terms of Reference
NPA	Notice of Proposed Amendment
A-NPA	Advanced Notice of Proposed Amendment
ABC	Advisory Body Consultation
Dec-CS	Decision re Certification Specification
Dec-AMC	Decision re Means of Compliance to IR
Dec-IR	Decision pending adoption of Implementing Rule
Opinion	Proposal to European Commission
Dec/O	Combined Decision (CS or AMC) & Opinion
RU	Regular Update



RMT.0018: Parts without EASA Form 1

 Simpler, lighter, better rules for General Aviation

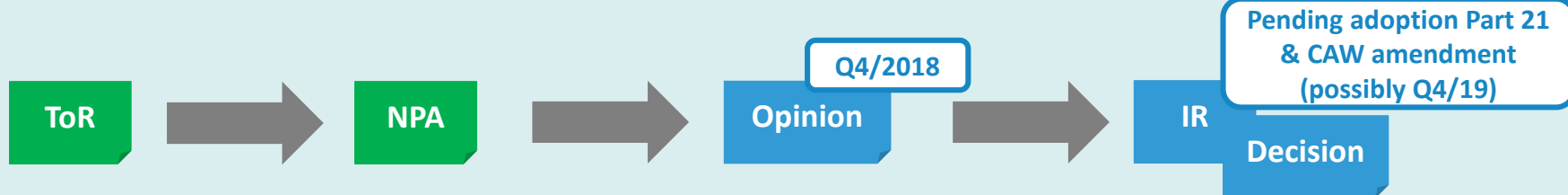
Objective: Introduction of proportional and flexible release and acceptance of parts.

The NPA proposes a regulatory change to allow that parts with lower criticality as identified by the TC holder, would not need an EASA Form 1 when used as spare part for installation during maintenance.

Part-21

CAW Reg.

AMC/GM





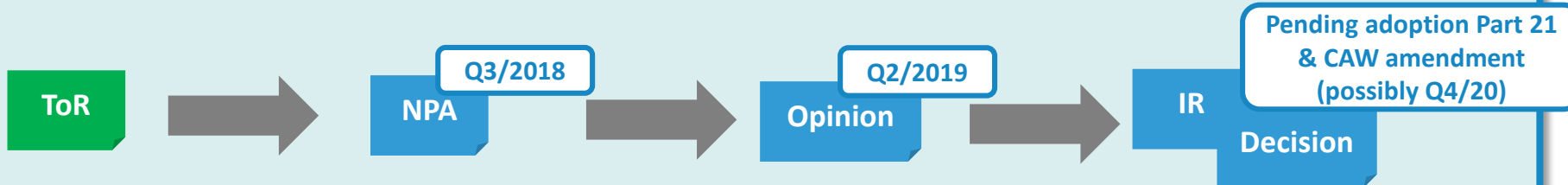
RMT.0251, Phase II: Embodiment of SMS

Objective: to amend Part-21 (and Part-145) to include SMS requirements, and related AMC/GM for design, production and maintenance organisations to align with ICAO Annex 19.

Part-21

CAW Reg.

AMC/GM





RMT.0252: Instructions for CAW

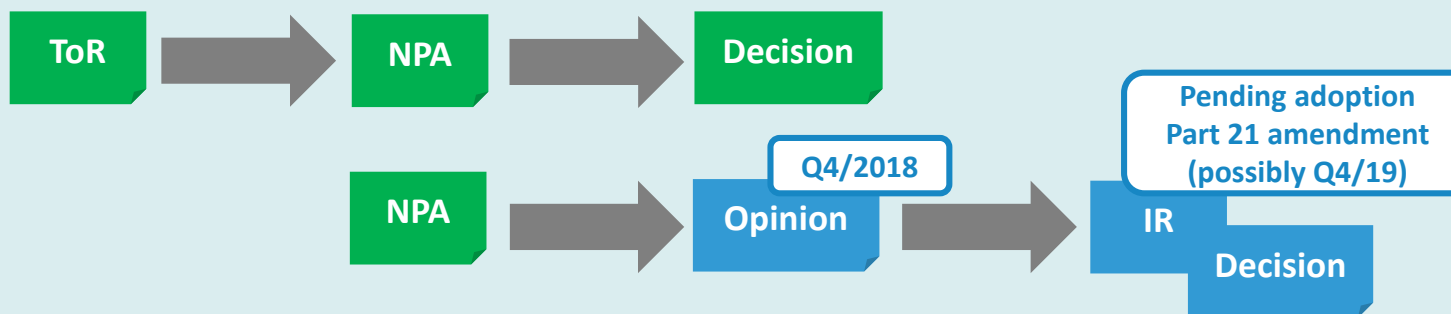
Objective: Establish clear requirements and responsibilities for all parties involved in the production of ICAs, their approval and their implementation.

- Definition and completeness of ICA (Subtask 1), availability of ICA (Subtask 2) and acceptance of ICA (Subtask 4).
- Certification maintenance requirements (Subtask 5) has been published.

Part-21

AMC/GM

CS-25



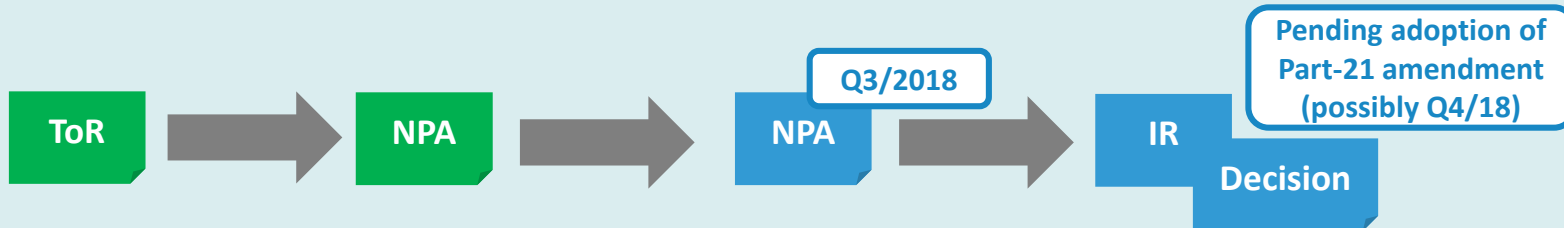


RMT.0262: LoI, Phase II (AMC/GM)

Objective: LOI implementation, Phase II.

More than 60 new or amended AMC/GM have been drafted to support the implementation of the new elements proposed by the Opinion 07/2016 and to reflect the changes proposed by Opinion. Particular attention has been paid to the explanation of the criteria to be considered for EASA LOI determination and to the introduction of the new privilege to approve major changes/repairs or STC.

AMC/GM
to Part-
21





RMT.0689: Part-21 proportionality

Simpler, lighter, better rules for General Aviation

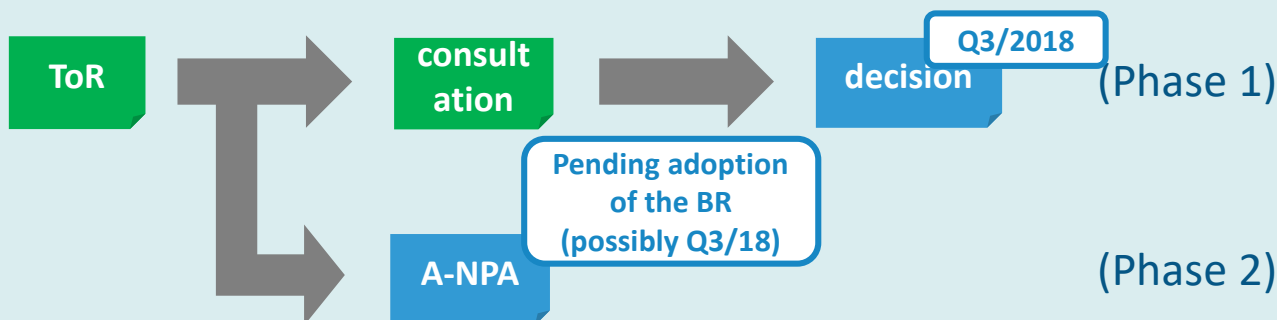
Objective: Provision of additional flexibility and simplification in Part-21 certification for GA that is proportionate to risks and meets acceptable safety levels.

► Phase 1: amendment of forms and other improvements, where rules are affected; using accelerated procedure; focused consultation workshop took place 9th June, now preparing adoption of Part-21 AMC/GM amendments.

► Phase 2: depending on the revision of the BR, task may be merged with general task to implement revised BR; timeline: 2 years after adoption of new BR.

Part-21

AMC/GM





Content

- Update on Part-21 rulemaking activities
- **How can I contribute?**
- How does EASA interpret the rules outside of AMC/GM material?



How can I contribute

1. Highlighting issues / proposing rulemaking activities

The screenshot displays the EASA website interface. The top navigation bar includes links for 'the agency', 'newsroom & events', 'EASA & you', 'regulations', 'document library' (highlighted with a red circle), and 'can we help you?'. The left sidebar shows a 'Rulemaking Process' section with a red circle around 'Rulemaking proposal'. The main content area is titled 'Rulemaking proposals' and contains the following text:

According to Article 3(3) of the [Rulemaking Procedure](#) adopted by Agency's organisation may propose the development of a new rule or an amendment

How to submit a Rulemaking proposal

In order to be considered for the development of the next Rulemaking Program Plan for Aviation Safety (PPAS), the rulemaking proposals should be submitted via the [Candidate Issue Form](#). This form replaces the old Rulemaking Proposal Form range of proposals for actions, including proposals for new rulemaking tasks and new issues.

Assessment of the received proposals and possible outcomes

The Agency receives new proposals for actions on a continuous basis from a Commission's requests, ICAO programme, FAA look A-head programme, the Network of Analysts (NoA), Safety Risk Management Process (SRM), internal and external stakeholders.

2 – Issue / Rationale

What is the issue / rationale? Please complete additional information below.

Description of the issue*

What is the problem? And why is it a problem? Provide a problem statement for the issue. Is this a safety issue? Or an Environment, Level-playing field, Efficiency/Proportionality issues? For safety issues only, if there are several scenarios that are relevant, please list them.

Affected stakeholders*

Describe who is affected by the described issue, what is affected (e.g. aircraft types, constituents or equipment, or type of operations and organisations), and, if applicable, specify in which flight phases and circumstances.

Sources & Rationale*

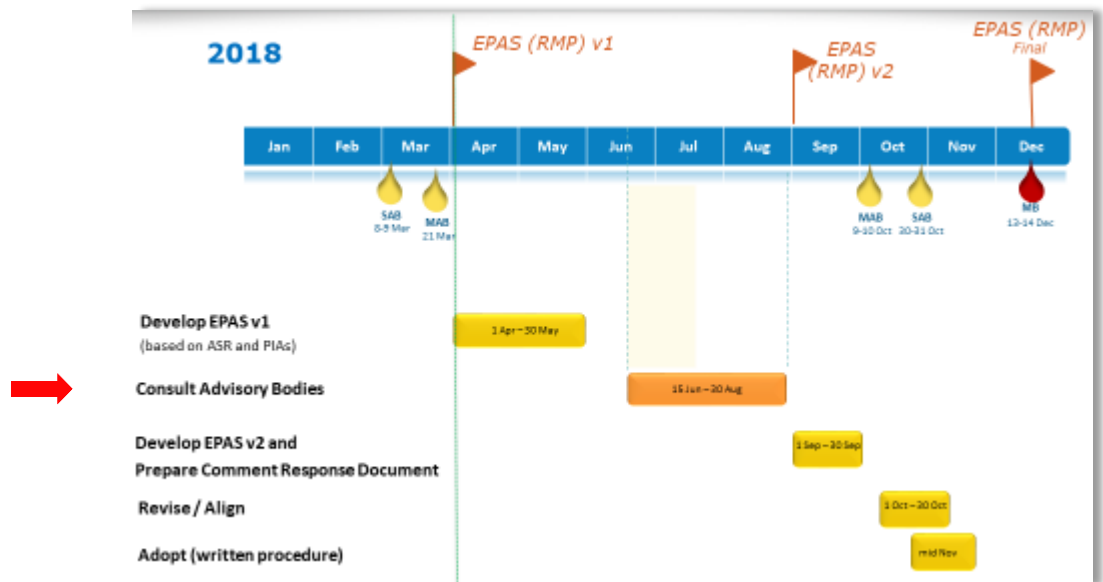
What triggered the identification of the issue? Are there data, studies or some other evidence available?



How can I contribute

2. Advising – through your associations (represented in the advisory bodies) – on the Agencies strategic priorities and draft RMP

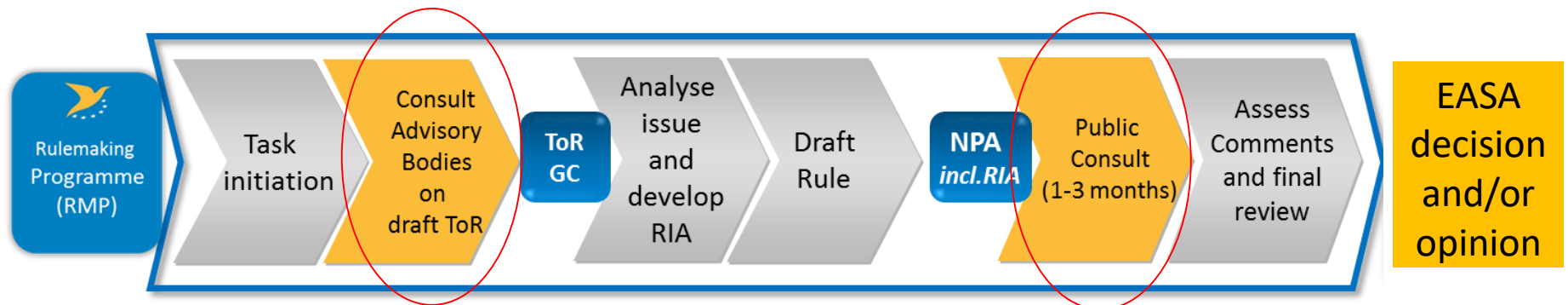
- a. in the advisory bodies meeting (e.g. DM.TEC)
- b. commenting Preliminary Impact Assessments (PIA) of candidate actions
- c. commenting the draft EPAS





How can I contribute

3. Advising directly or through your associations (represented in the advisory bodies) detailed rulemaking activities





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The rules

- Part-21 is the legislative document that you need to follow
 - adopted by the Commission on the basis of an EASA proposal
-
- AMC to Part-21 are possible means how you can comply with Part-21, and which the Agency considers in any case to be acceptable for the competent authority (presumption of compliance)
 - adopted by EASA and prepared by the teams developing the proposal for Part-21
- GM to Part-21 is interpreted as a non-binding document aiming to clarify or illustrate the meaning of Part-21 requirements
 - adopted by EASA and prepared by the teams developing the proposal for Part-21

The “legislators” view on how the Regulation can / should be applied (best)



The application of the rules

- The applicant and the competent authority consider the AMC/GM
 - ideally, using the AMC to demonstrate compliance
 - where no AMC exist, applicants/ certificate holders have to determine themselves how to comply with the rule and the competent authority has to assess
 - where AMC exist, applicants / certificate holders may also use other means to demonstrate compliance and the competent authority has to assess
- The competent authority may have the need to further support the application of the rule (e.g. clarifying the meaning of certain terms used in the Regulation or the AMC/GM)
 - where EASA is the competent authority on certification matters, it communicates such further interpretation using the tool of a “certification memorandum”



The application of the rules

► Certification Memoranda
an overview of all Certification
Memoranda (planned, under
development and final) is
published on EASA website at

<https://www.easa.europa.eu/document-library/public-consultations/certification-memoranda#group-easa-downloads>

Rev 7 March 2018 Overview Planned - Under development - Final CM

Technical discipline/ subject category	CM Number	Issue	Rev.	Title	Reg. material	Status
Hydromechanical Systems	CM-HS-001	01	00	Respecting Brake Energy Qualification Limits	CS-25	Final CM & CRD published
Powerplant Installations and Fuel Systems	CM-PFS-002	01	00	Approval of Engine Use with a Thrust Reverser	CS-E 10(b)	Final CM & CRD published
Cabin Safety	CM-CS-001	01	00	Use of Aircraft Materials Fire Test Handbook # DOT/FAA/AR-00/12	CS 25.853 (including Appendix F) CS 25.855 CS 25.857 CS 25.858 CS 25.869	Final CM & CRD published
Part 21	CM-21.A-00X	01	00	Definition of initial flights for helicopters	Annex Part 21 to Commission Regulation (EC) 1702/2005	On hold
Avionic Systems	CM-AS-00X	01	00	Aspen integrated cockpit lay-out	N/A	Cancelled
Software and Complex Electronic Hardware	CM-SWCEH-001	01	00	Development assurance of airborne electronic hardware	CS 25.1301 & 25.1309 CS 23.1301 & 23.1309 CS 27.1301 & 27.1309 CS 29.1301 & 29.1309 CS E-40 (a-f) CS-P CS-APU CS-ETSO	Final CM & CRD published
Software and Complex Electronic Hardware	CM-SWCEH-001	01	01	Development assurance of airborne electronic hardware	CS 25.1301 & 25.1309 CS 23.1301 & 23.1309 CS 27.1301 & 27.1309 CS 29.1301 & 29.1309 CS E-40 (a-f) CS-P CS-APU CS-ETSO	Final CM published (editorials only)
Software and Complex Electronic Hardware	CM-SWCEH-001	01	02	Development assurance of airborne electronic hardware	CS 25.1301 & 25.1309 CS 23.1301 & 23.1309 CS 27.1301 & 27.1309 CS 29.1301 & 29.1309 CS E-40 (a-f) CS-P CS-APU CS-ETSO	Editorial change in section 6 to reflect that the guidance material provided in section 6 is repeated and superseded by ASAC CM-AS-CM (Issue 2) Revision 03/On Single - vert Effects [SSE] Caused by Atmospheric Radiation, dated 06/01/2018

1



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European Aviation Safety Agency

Thank you.

Questions ?

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