



Aerospace and Defence
Industries Association of Europe

Group 5 ASD Community side meeting outcome



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Content

A vertical timeline graphic on the left side of the slide. It consists of four white circles connected by a thin blue line. Each circle is positioned to the left of a blue rectangular box containing text. The circles have a small blue line segment extending from the top-left and bottom-left, giving them a 3D or pin-like appearance.

2015 ASD subjects follow up

ASD DOA Task Force 3 “Part 21 rationalisation”

Approval of minor change with digital means

DOA Performance Dashboards feedback

2015 ASD subjects follow up

1. minor–minor Changes or Repairs – lack of definition in current Part 21 & AMC

- Covered by ASD Task Force 2 DOA Think Tank
 - WG 10 “[Repair design management and approval](#)” PrEN9252 under active discussion with EASA
 - WG 08 “[Post-TC design change management](#)” PrEN 9256 will integrate outcome from WG10 discussions



minor-minor

2. Part Marking

- Integrated within Task Force 3 “Part21 rationalisation” (see next slides)



Part Marking

3. Concessions

- Currently under discussion within ASD Task Force 2 DOA Think Tank WG 09 “[Concession management](#)” PrEN 9254



Concession



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ASD
DOA Task Force 3
“Part 21 rationalisation”



ASD Task Force 3 Objectives

- To propose to EASA:
 - Simplification and clarification of the Part 21 DOA related requirements applicable to the DOA applicants/holders
 - To maximize the flexibility and the adaptations in their implementation by transferring parts of requirements (hard law) to the AMC/GM (soft law) for the benefit of both the EASA and European Industry.



Part 21 change proposals

- All requirements and associated GM/AMC in Part 21 Subparts A, B, D, E, J, K, M, O, P and Q have been reviewed.
- 80 comments and proposals for change have been drafted, including:
 - minor/major criteria for classification of ALS changes
 - Simplification of Type Design definition
 - clarification/rationalisation of various requirements on record keeping, Manuals and ICAs
 - Clarification on ICAs versus Type Certificate changes
 - Clarification on part marking requirements
 -
- All details in attached table (issue 3 dated 18 July 2016)



PART21 ration



Records Keeping example

Id.	Requirement	Comment & change proposal
	Record keeping	<p>Change Proposal:</p> <p>To regroup record keeping sections in one single section within Part 21, under Subpart A General</p> <p><i>21.A.5 Record Keeping</i></p> <p><i>All relevant design information/data, drawings and test reports, including inspection records for the product test holder type certificate or restricted type certificate holder at the disposal of the Agency and/or competent authority provide the information necessary to ensure the continued airworthiness, continued validity of the operations compliance with applicable environmental protection requirements of the product.</i></p> <p><i>GM 21.A.5</i></p> <p><i>Relevant information/data include at least:</i></p> <p><i>1- For TC/RTC/Changes/ STC/Repair/ETSO as applicable:</i></p> <ul style="list-style-type: none"><i>- Design data such as Type certificate data, ETSO, repair design data</i><i>- Certification programme</i><i>- Compliance demonstration data</i> <p><i>2- For flight conditions & Permit to flight:</i></p> <ul style="list-style-type: none"><i>- justification data</i><i>- approval data (e.g EASA Form 18A, EASA Form 20b)</i>



Way Forward

- Review of ASD DOA TF3 proposals to be done via the EASA focal point (internal reviews within EASA + discussions with the ASD DOA TF3 representatives):
 - in the frame of LOI NPA 2* (AMC/GM to LOI concept)
 - In the frame of OSD NPA 2* (AMC/GM)
 - In the frame SMS NPA1* (requirements)

*Note: Purpose being not to impact current activities on LOI NPA1.

- To be coordinated with rulemaking task RMT.0031 “Regular update of AMC and GM to Part-21”



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Approval of minor
change with digital
means



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Digital Approval of minor change

Current wording:

AMC No. 1 to 21.A.263(c)(2) Procedure for the approval of minor changes to type design or minor repairs

../....

2. PROCEDURE FOR THE APPROVAL OF MINOR CHANGES TO TYPE DESIGN OR MINOR REPAIRS

../....

2.3 Approval under the DOA privilege

2.3.1 For those minor changes to type design or minor repairs where additional work to demonstrate compliance with the applicable CS and environmental protection requirements is necessary, **the procedure must define a document to formalise the approval** under the DOA privilege.

This document must include at least: ../....



Digital Approval of minor change

Problem statement :

- The current wording of the AMCs to part 21.A.263(c)(2) implies that a “document” should be produced to record the approval.
- Today, with current information management system there are digital solutions which could manage the information without generating a “document”.

Proposed Way forward:

- ✓ **The use of digital solutions as alternative to “classic document” should be recognized.**
- ✓ **A digital freeze of the definition in configuration management database with all attributes as quoted in AMC is a possible alternative.**
- ✓ **Digital signature should have the same robustness & legal basis as a wet signature.**



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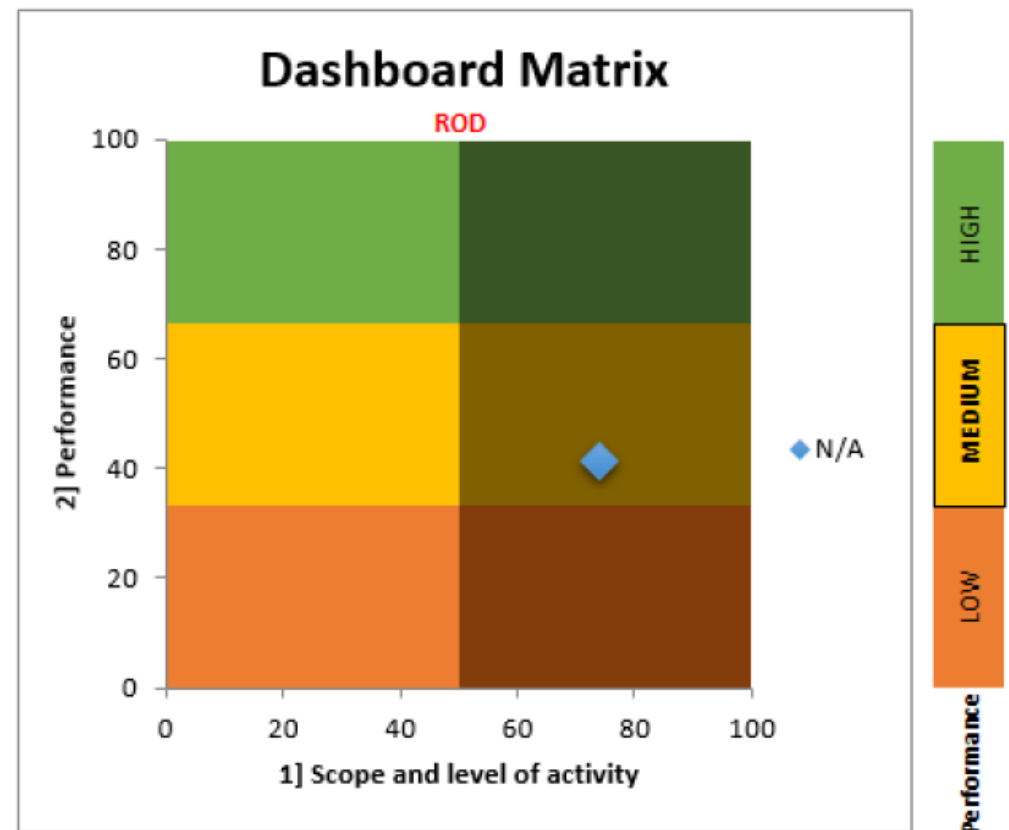
DOA Performance
Dashboards –
EASA feedbacks on
certification project

DOA Performance Dashboards

Draft Certification Memo “ **Criteria for the determination of the Agency's level of involvement in product certification**”

The overall performance and associated risk are measured taking into account:

1. Scope and level of activity
2. Performance



DOA Performance Dashboards



DOA Performance

➤ 2] Performance

- Feedback on certification projects
 - Findings
 - Responsiveness to findings
 - Performance Indicator from last year
 - CVE Turnover
 - ISM Performance
 - Other intelligence



DOA Performance Dashboards

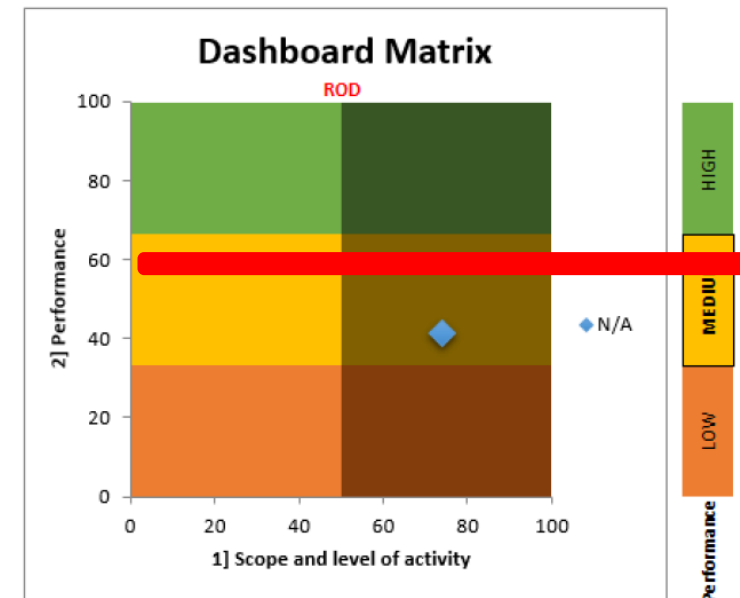
Feedback on certification projects

- Major Mods, TC and STC
- Three scored criteria
 - PPC: Project Planning & Communication
 - ARC: Applicable Requirements & Means of Compliance
 - CD: Compliance Documents
- Evaluation principles
 - Evaluation given by PCMs/panel experts for each criteria
 - **Green = 100**
 - **Orange = 50**
 - **Red = 0**

DOA Performance Dashboards

Concerns & Proposals:

- **Lack of guidance for PCM /expert rating**
 - Is 100 means : “no comments on application data” ? (or is it 50)
 - What is the difference between 0 & 50 ? Number of comments ?
- Today’s Experience shows that **more than 80 % of the evaluations are rated 50**
 - *80% of 50 with 20% of 100, the average result is 60*
- With a big volume of projects
-> **the average will always lead to “Medium” performance**





DOA Performance Dashboards

Draft Certification Memo “ **Criteria for the determination of the Agency's level of involvement in product certification**”

Step 1: Likelihood of an unidentified non-compliance			
CDI performance of the organisation	no novel or complex aspects	no novel, but complex aspects ; novel, but no complex aspects	novel and complex aspects
High	Very low	Low	Medium
Medium	Low	Medium	High
Low or unknown	High	High	High

DOA Performance Dashboards

Draft Certification Memo “ Criteria for the determination of the Agency's level of involvement in product certification”

Step 2: Determination of the Agency’s level of involvement

<div> <div>Likelihood</div> <div>(see Chap. 3.2.5)</div> <div>Severity (see Chap. 3.3)</div> <div>Critical</div> <div>Non-Critical</div> </div>	Low	Medium	High
	Level 3	Level 4	Level 4
	Level 1	Level 2	Level 3

•Medium DOA performance results in minimum Level 3 EASA LOI for “major” change (level 1 and 2 cannot be selected)

✓Objective criteria and guidance need to be defined for PCM/panel feedback on certification project



DOA Performance Dashboards

Concerns & **Proposals** (cont'd):

- Today experience shows that a static figure on yearly basis does not help to improve the performance
 - the effectiveness of any corrective action will take more than one year to become visible.
 - ✓ **Intermediate report (Quarterly) needs to be provided with tendency indicator**
- “100” for 1 project is it better than “75” average for 60 projects ?
 - ✓ **The feedback per panel needs to be correlated with the number of feedback**
- How to minimise “rotation policy” effect on Project feedback ?
 - **The criteria for assessment should differentiate Request for technical clarification to identified “non-compliance”**



DOA Performance Dashboards

Concerns & **Proposals** (cont'd):

- The representativeness of panel feedback, Is there always 100% of the collected feedback per project ?
 - ✓ **The ratio of number of project per panel per number of feedback is needed**
- Some justification for rating need to be visible to DOA Team leader
 - ✓ **When a rating below 100 is provided, identification of area for improvement should be identified**



DOA Performance Dashboards

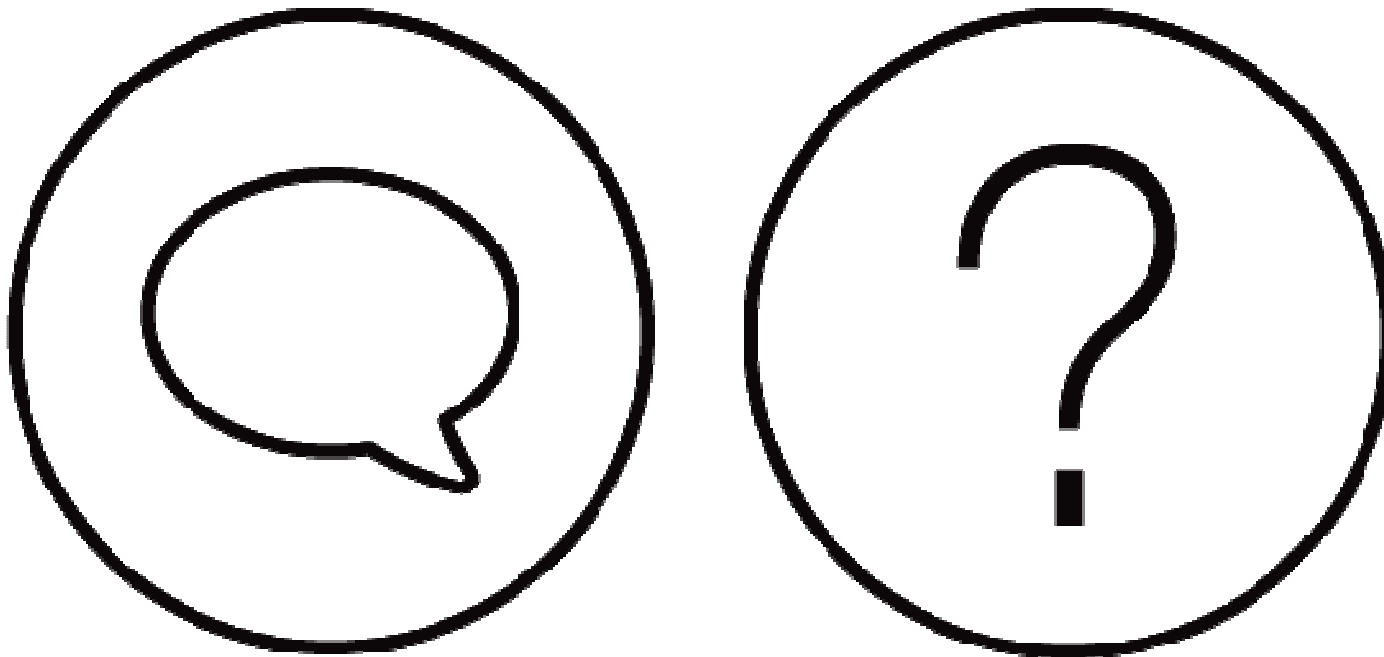
Concerns & **Proposals** (cont'd):

- Sharing of data collected from the certification projects (DOA performance feedback) with the concern DOA Holder.
 - Last EASA position : data shall be shared on an aggregated form only and no longer with details at each project level.
- ✓ **The data management should ensure that there is no individual blame (*Just Culture approach*).
But in the absence of feedback back to each project level, the efficiency of improvement action will be strongly reduced**



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Discussions / questions:





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Thank you

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