



EASA regulatory framework for aging aircraft issues

EAPAS / AASR EASA / FAA / DAH
Familiarization meeting
EASA Cologne
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The regulatory framework for aging aircraft issues

➤ Contents of the presentation:

★ **Design Approval Holder (DAH) rules**

- ➔ Long term
- ➔ Short term for EAPAS

★ **Maintenance rules**



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➤ Design Approval Holder rules:

★ Long term: included in the proposed revision of 1592/2002 to extend EASA scope

- ➔ Proposed revision to article 5 would request to create provisions into Part-21 with regard to:
 - ➔ Syllabus for Maintenance certifying staff type rating training, syllabus of pilot type rating training, MMEL, additional airworthiness specifications for a given type of operations
- ➔ Task 21.039 of rulemaking programme: Incorporation of 'operational' issues in Type certificate.
 - ➔ NPA scheduled 1 quarter 2008
 - ➔ Opinion scheduled 4 quarter 2008.
 - ➔ One of the options under consideration for DAH rule would be a concept of Safety Enhancement Directive



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➤ Design Approval Holder rules:

★ In the meantime for Aging Systems:

- ➔ Use of Paragraph 21A.3B(c)(1) that broadly says:
 - ➔ **When an airworthiness directive has to be issued by the Agency, the TCH shall propose the appropriate corrective actions or required inspections and submit details of these proposals to the Agency for approval**
- ➔ The Agency would send letters to request review of ICA to incorporate results of EZAP by TCH holders.
 - ➔ **Airworthiness Directives would be issued only in case of non-cooperation by a TCH.**
- ➔ When ICA are amended by TCH, Operators are required by Part-M to incorporate them into their maintenance programmes.
- ➔ TCDS will record compliance to EWIS ICA provisions (Appendix H.25.5)



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➤ Design Approval Holder rules:

★ In the meantime for Aging Systems:

- ➔ Pending modification of TCDS, special conditions will be systematically issued for approvals of modifications affecting EWIS ICA when application is after the amendment to CS-25 (June 2008)



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➤ Maintenance rules:

★ Maintenance programmes

- ➔ Part-M M.A.302 requires maintenance programmes to be based on data produced by TC holders, STC holders or organisations required to by Part-21:
 - ➔ *(f) The maintenance programme must be subject to periodic reviews and amended when necessary. The reviews will ensure that the programme continues to be valid in light of operating experience whilst taking into account new and/or modified maintenance instructions promulgated by the Type Certificate holder.*
 - ➔ *(g) The maintenance programme must reflect applicable mandatory regulatory requirements addressed in documents issued by the Type Certificate holder to comply with Part 21A.61.*
- ➔ Anything else requires the approval by the competent authority. In the case of ALIs and CMRs this is EASA.



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➤ Maintenance rules:

★ Maintenance Data

- ➔ Part-145 145.A.45 requires AMOs to hold and use current maintenance data.
- ➔ The maintenance instructions can only be modified with the approval of the competent authority.



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➤ Maintenance rules:

★ Maintenance Training

- ➔ Part-145 145.A.30(e) and Part-M M.A.706 require personnel to be competent and this competence to be evaluated in view of their tasks.
- ➔ This is part of the organisation's expositions that is approved by the competent authority.

★ Control of aircraft configuration

- ➔ Part-M M.A.301 requires operators to control the configuration of their aircraft and to have an embodiment policy for non mandatory modifications
- ➔ Furthermore, M.A.304 requires modifications and repairs to be accomplished in compliance with Part-21. The resulting maintenance data will then become maintenance data that needs approval to be changed.



- **THANK YOU FOR YOUR ATTENTION**
- **COMMENTS/ QUESTIONS ARE WELCOME**