

MAB Meeting Report

(1) Welcome and Introduction

Presenter: Chair

The meeting was chaired by Christopher Holgate-Romanov, Head of Department - Strategy and Programmes, who welcomed the participants and opened the meeting.

(2) Adoption of the agenda and [minutes of the last meeting](#)

Presenter: Chair, MAB Secretariat

The Agenda of MAB 02-2023 and the MoM of MAB 01-2023 were adopted.

(3) Review of [open action items](#)

Presenter: MAB Secretariat

The following actions were closed at the meeting:

- EASA to table the topic of regulatory sandboxes to the MAB Research Group in order to discuss the concept and for the Group to contribute to the drafting of the material (2023-01/#04)
- EASA will share with the MAB a paper providing an overview of the measures it is taking to ensure timely availability of AMC/GM (2023-01/#05)
- ATCO Study: Reminder to MAB Members who may still want to share any previous study, material or data to the Agency (2023-01/#06)
- EASA to provide an update to the MAB on the AOB raised by FR w.r.t. the publication of AltMOCs (2023-01/#08)

(4) EASA Update ([Presentation](#)), ([Information paper 01](#)), ([Information paper 02](#))

Presenter: Chair

The Chair presented an update on EASA activities since the last meeting.

With regards to questions related to RefuelEU, the Agency confirmed that the labelling provision is voluntary but clarified that once an airline chooses to opt-in, it will have to use the methodology as defined in the future Implementing Rule. It was further specified that the agreed scope is limited to commercial operators, to enable passengers making an informed choice. MAB Members requested more information on the new international cooperation project with India and Africa in the area of Sustainable Aviation Fuel (SAF) and the Agency informed that this project is part of EC's support to ICAO's new Capacity-building and Training for Sustainable Aviation Fuels programme (ACT-SAF). EASA will be the implementing partner to perform capacity building and training in these two regions.

On safety intelligence, the MAB discussion highlighted the importance of having a Working Group that would look at safety performance indicators from a wholistic point of view, aligning and connecting those used by industry, States at the level of the State Safety Plan as well as those used at European and ICAO level. On the EASA multi-lingual website (EASA 'Light'), FR noted some translation errors which the Agency took note of and will pass to the relevant services. On the topic of unruly passengers, MS shared steps they are taking to address the issue (IE, FR, HU, NO), raised considerations related to incidents linked to the misuse of prescriptive drugs as well as legal considerations, and called for sharing of best practices.

MAB Members also inquired on the topic of this year’s Annual Safety Conference (Seville, 27-28 September) which will be on innovation, and the related challenges for regulators.

(5) Preparation for expected disruptions in the summer period

Presenter: Eduard Ciofu

The MAB welcomed the comprehensive work of the Agency in this area and the presented analysis of safety issues. The Agency invited MAB Members to raise awareness and coordinate accordingly with their stakeholders at national level, as well as to review and comment on the upcoming draft Safety Information Bulletin (SIB), which will be consulted with the Advisory Bodies. With regards to cybersecurity-related risks, the discussion noted that, on the one hand, it is important to put in focus the risks that are clearly related to the summer situation for the purpose of this exercise, while on the other, cybersecurity has to be taken into account in the risk analysis given the hyper-connected environment of aviation.

(6) Update on EASA cybersecurity activities and Part-IS implementation ([Presentation](#))

Presenter: Gian Andrea Bandieri

At the ensuing discussion, comments from the MAB focused on:

- the availability of a list of activities to be included in AMC/GM, in order to help organisations define the scope of their ISMS. The Agency informed that several requests for such contribution have been sent to industry, but so far have not been successful. EASA will now collect this information during the initial part of implementation;
- The need for a dedicated taxonomy to classify cyber events, with the Agency confirming that the Network of Cyber Analysts is working on this;
- Support to MS for communication to their stakeholders: the Agency informed that a lot of material has already been shared with the MAB Task Force and offered to share a communications package including this material; EASA is also available to support specific requests;
- Training of inspectors: the Agency has defined a set of competences and training requirements but has so far had difficulty to find a training provider. Discussion has started with EUROCONTROL for the potential development of such course, which will first be for EASA staff; after this initial ‘test’, it could be shared with NAAs;
- Pilot projects, where the Agency invited MS to make further proposals for pilot projects led by NAAs;
- Questions on the timetable of the discussions on Part-IS as ‘lex specialis’ for the NIS 2 Directive: the Agency informed that discussions are in an initial phase, and, while there is confidence regarding the equivalence, it can be a long process. It was further noted that Part-IS is already compliant with NIS 2 - which does not require an ISMS – and that Art.4 of the Directive does not require transposition into the national system, so the best approach for a decision on equivalence would be at European level.

Action 2023-02 #01	EASA to share with the MAB a communications package on Part-IS including material already shared with the MAB TF	EASA	MAB 03-2023
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(7) Update on rulemaking in the area of Ground-handling (RMT.0728) ([Presentation](#))**Presenter: Adina Szonyi**

The MAB welcomed the comprehensive presentation. Comments focused on:

- the concept of 'hub and spoke' and collaborative oversight, with some concerns expressed on its practical implementation, thus requiring clarity at the level of the rule on the respective processes and responsibilities;
- the need for proportionality in the eventual application of Part-IS to minimise additional burden for industry; the Agency confirmed that a longer transition period would be proposed for the requirements related to Part-IS;
- the potential recognition of industry standards, with varying views on maturity and suitability in particular w.r.t. ISAGO; the Agency noted the collaborative process with MS to evaluate such standards and that crediting ISAGO could happen in the future when the programme is more mature;
- the oversight cycle and responsibilities of NAAs, in particular on the oversight of operators as well as on the issuing of declarations or means to revoke them in case of findings;
- Pan-European organisations with no Principal Place of Business (PPoB) in the EU: some MS supported an amendment of the BR to provide legal basis for EASA as competent authority; on PPoB, it was also reminded that the guidelines already published by EC/EASA on its definition remain valid;
- The transportation of dangerous goods and the need for it to be more explicitly addressed in the regulatory proposal;
- Interference with GH Directive, where the Agency clarified that in cases where national rules used to transpose this directive have safety dimensions, these will have to be withdrawn as there cannot be duplication with the EU legislation;
- The scope of the regulation, where it was clarified that this does not include helicopter operations (for now), non-commercial operators (NCC, NCO) and specialised operators (SPO) when they do self-handling, as well as CAT operators of small, non-complex aircraft.

Finally, there was a request by most MS to extend the consultation period of the draft Opinion to mid-September.

(8) EASA measures to ensure timely publication of AMC/GM ([Presentation](#)) ([Information paper 03](#))**Presenter: Michael Gerhard**

The MAB welcomed the presented measures. Related to the topic of EPAS, the Chair informed the MAB that, among the proposed structural measures discussed at the PAR AG aiming to bridge the budgetary deficit on the side of the EU contribution, is to potentially de-prioritise some of the rulemaking tasks for 2024, should the need arise at the end of the year.

(9) ATM Update ([Presentation](#))**Presenter: Athanassios Tziolas**

On ATM Ground Equipment, FR pointed out that the issue of outermost regions is still not addressed bilaterally. The Agency assured the MAB that the Commission and EASA are committed to address the last remaining issues before the next EASA Committee meeting. On Performance-based Navigation (PBN), DE commented that, with regards to noise-related aspects, it is important to have the opportunity to deviate from ICAO-compliant PBN and allow some more flexibility for Member States. On the scope of the national transition plans, it was clarified that, while the focus is on approach procedures, the plans should incorporate environmental aspects including CO2 and noise, thus bridging

safety and environmental benefits. Acknowledging the complexity of the task, the Agency's experts are available to support MS.

(10) Evolution of EASA standardisation activities (Presentation)

Presenter: Jesper Rasmussen, Bernard Bourdon

There was wide support for the proposed approach, the increased focus on management systems and request for a better alignment with ICAO reporting requirements in order to alleviate additional burden on NAAs. Main comments from the MAB focused on:

- the practical implementation of the new approach on inspections, requesting more information on frequency, duration and workload for NAA staff – this is planned to be discussed in more detail at the regular meetings of national Standardisation coordinators;
- the potential impact of increased desk-top audits on NAA resources;
- the need for more lean time and advanced planning, as well as for IT tools that bring benefits to both MS and EASA;
- inspector training, and how best to transform and adapt it to the new concept;
- the potential to reflect this approach also to industry inspections in the future, as well as the need for communication to industry - on this, the Agency informed that an update has been requested by industry at the next SAB meeting in June;
- The possibility to share more widely the lessons learnt from inspections was also raised and the Agency offered to share its maturity indicators, if so agreed by MS.

MAB Members also confirmed the great benefits of having NAA inspectors participating to EASA inspections, a practice which will continue in the future. Replying to a question, it was clarified that the new approach does not require a revision of the Standardisation Implementing Regulation, at least not in the short term. Finally, the Agency informed that a pilot case inspection will take place in Poland in June of this year, with a gradual roll-out planned for the next two to three years.

(11) Status report on Exemptions and AltMoC (Presentation)

Presenter: Jesper Rasmussen, Stephan Baertges

MAB Members were invited to endorse the proposed solution with regards to the sharing of EASA-approved AltMoCs on the Flextool. While there was consensus on the proposal as presented (with limited information published i.e., AltMoC title and contact information as the main content), some MS (FR, BE) requested to include in the publication also the AltMoC summary, which in turn raised some concerns on data confidentiality and related risks (FI). A potential solution to this could be that this 'enhanced' approach is only applied to **new AltMoCs cases notified through FlexTool as of 2023**, where MS, when drafting the summary themselves, can take into account the fact that it will be published on the tool. The Agency will investigate internally the related technical feasibility and timeline.

Post meeting note: proposals were further discussed after the meeting. EASA will follow up and contact the MAB with a proposed way forward regarding the field of the AltMoC summary.

Action 2023-02 #02	EASA to follow up and contact the MAB with a proposed way forward regarding the field of the AltMoC summary.	EASA	MAB 03-2023
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(12) Recognition of the SMS International Industry Standard for Maintenance (Part-145)
(Presentation)

Presenter: Jesper Rasmussen, Bernard Bourdon

At the ensuing discussion, the MAB raised concerns with regards to the governance of this industry standard which is not part of a recognised industry standard body. Main comments from MS focused on the importance of a robust governance structure of such standards, including clear responsibility to maintain and keep them aligned with e.g. ICAO developments; the potential proliferation of industry standards and impact on NAA resources; and the potential use of an accreditation body which, in this case, is not contemplated.

Replying to questions, the Agency informed that the topic of enhanced use of Industry Standards had been raised by the SAB already last year. In the case of this particular SMS standard, it was noted that its recognition in Part 21 and soon possibly also in Part 145 has no impact on the requirements for integrated risk management and that an acknowledgement of a Standard will not change the implementing rules. It was further explained that this international standard (SMS 0001) was developed by international manufacturing associations in EU, US, CA and BRA, in order to provide a harmonised approach to comply with ICAO Annex 19 (and EU rules). If EASA is not endorsing the standard for Europe, it would lead to an undesirable proliferation of AltMoC applications to various NAAs from different manufacturers.

The next step in the rulemaking procedure will be the consultation of the draft AMC, awaiting Industry's closing the gap between the Part 145 SMS rules and the industry standard. The MAB requested to make available the gap analysis with the latest revision of the standard, and the Agency confirmed that it will be included in the upcoming consultation.

In parallel, EASA will consider how to involve both industry and MS in further discussions on how to apply industry standards in the regulations.

(13) AOB

- **ECCAIRS 2 (Presentation)** – Frederik Blauuw (NL), Geert Kinders (EASA)

There was in principle support for the proposal, providing adequate funding will be possible, while MAB Members also pointed out potential risks, incl. distraction on the ramp, impact on NAA resources in case of very high volume of individual reports and circumventing the organisational SMS (this would not apply to GA). As proposed, the topic will be followed up at the SM.TeB.

- **Update on Data4Safety (Presentation)** – Leopold Viroles (EASA)

A short update on D4S was presented at the request of ES. Replying to questions from the MAB, the Agency noted that, while the Proof-of-concept phase provided many solutions to the identified challenges, D4S remains a complex programme with the main challenge to continue to develop the safety benefits for both members and the system as a whole. It also clarified that the priority in the Development phase is on safety, however in a second stage, use cases should be considered that touch on the interfaces between safety and environment or cybersecurity. The Agency also confirmed that Artificial Intelligence services such as machine learning are included in the services requested through the tendering process. Furthermore, MAB invited EASA to contribute to the ICAO Panel on safety management, and the Agency confirmed that it is indeed part of the activities of EASA's representative in Montreal. With regards to lessons learnt from similar initiatives worldwide, the Agency informed that such analysis with initiatives in the US or South East Asia has taken place and interfaces continue. It was agreed that a further update on D4S will be included in the EASA update at the next MAB meeting.

- **Inconsistency between AMC's for similar requirements between domains – Pall S. Palsson (IS)**

Pall S. Palsson raised an issue related to the content of AMC's being very different in some cases between domains, even though the regulation requirements may be very similar. As an example, he mentioned the qualification for Safety Manager, as according to CAMO and later Part-145, the person responsible for Safety Management needs to be Part-66 license holder with additional training, or engineer related to maintenance. Very limited requirements are described in Operations requirements, and in the draft for Ground-handling, the person needs to be experienced in crisis management. This has caused some frustration among stakeholders, and the requirements can be very difficult to comply with. Pall stated that this is not the only area where such inconsistency exists and suggested that EASA harmonises the content of the AMC. The Agency will look into the issue and come back to the MAB.

- **Visit of ICAO Secretary General to EASA**

DE requested more information on this visit. The Chair informed that it is part of a broader visit in Europe, including meetings with ECAC and the Commission. On 26 May he will visit EASA to meet Management and address staff at the occasion of EASA's 20th Anniversary. Among topics on the agenda are sustainability, USOAP, cybersecurity, international technical cooperation, Regional Safety Oversight Organisations (RSOOs), crisis management and innovation.

- **MAB agenda**

The Agency gave a brief overview of the planning for the MAB agenda, based on the annual MAB Work Programme. Among potential agenda items for the next MAB meeting (4-5 October 2023), are U-Space Certification, Sustainability, ATM, Cybersecurity, the Drones strikes research project and other strategic topics depending on their development (e.g. digitalisation or partnership with MS). The MAB was invited to make further suggestions and IE asked to include an update on DOA and STC certification workload at EASA and,, on the topic of drone strikes research project, an update on any potential need for revision to the EASA guidelines for management of drone incidents at airports.

Action 2023-02 #03	EASA to include Data4Safety in its update at MAB 03-2023	EASA	MAB 03-2023
Action 2023-02 #04	EASA to look into the issue of inconsistencies in AMC w.r.t. the requirements for safety managers and report back to the MAB	EASA	Q4 2023

MoM Distribution:

MAB Members, Observers and Alternates, and EASA management

MoM prepared by	Savina Zakoula-Cherdron	25/05/2023
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MoM approved by	Christopher Holgate-Romanov	26/05/2023
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Annex - List of Participants

Country/Organisation	Name	SURNAME
Austria	Karin	PULEO-LEODOLTER
Belgium	Kris	CLARYSSE
Bulgaria	Eleonora	DOBREVA
Croatia	Ana	KAPETANOVIC
Cyprus	Michael	AGISILAOU
Cyprus	Neophytos	CHRISTOFIDIS
Denmark	Gustav	CHRISTOFFERSEN
Denmark	Henrik	ELLERMANN
EC - DG MOVE	Klaus	WINKLER
EDA	Christophe	VIVIER
Eurocontrol	Paul	EIJSSSEN
Finland	Kirsi	LAHTEENMAKI-RIISTAMA
France	Louis	TEODORO
France	Philippe	AURADE
Germany	Dirk	SAJONZ
Germany	Raimund	KAMP
Greece	Konstantinos	KARAGEORGIS
Hungary	Erika	VARGA
Iceland	Pall	PALSSON
Ireland	Declan	FITZPATRICK
Italy	Fabio	NICOLAI
Italy	Mario	TORTORICI
Latvia	Dace	REVISORE
Latvia	Aivita	LUBLINA-GOLDMANE
Luxembourg	Stéphane	VALLANCE
Netherlands	Frederik	BLAAUW
Netherlands	Rene	PUTTERS
Norway	Nina	VINDVIK
Poland	Andrzej	KOTWICA
Romania	Madalina	CATRINA
SESAR	Jean-Jacques	BLANCHARD
Slovakia	Martin	NEMECEK
Slovenia	Ana	HOZIC
Spain	Pablo	HERNANDEZ
Sweden	Anne-Marie	RAGNARSSON
Sweden	Magnus	MOLITOR
Switzerland	Alexandre	TRIVERIO
Switzerland	Luca	ZAUGG

