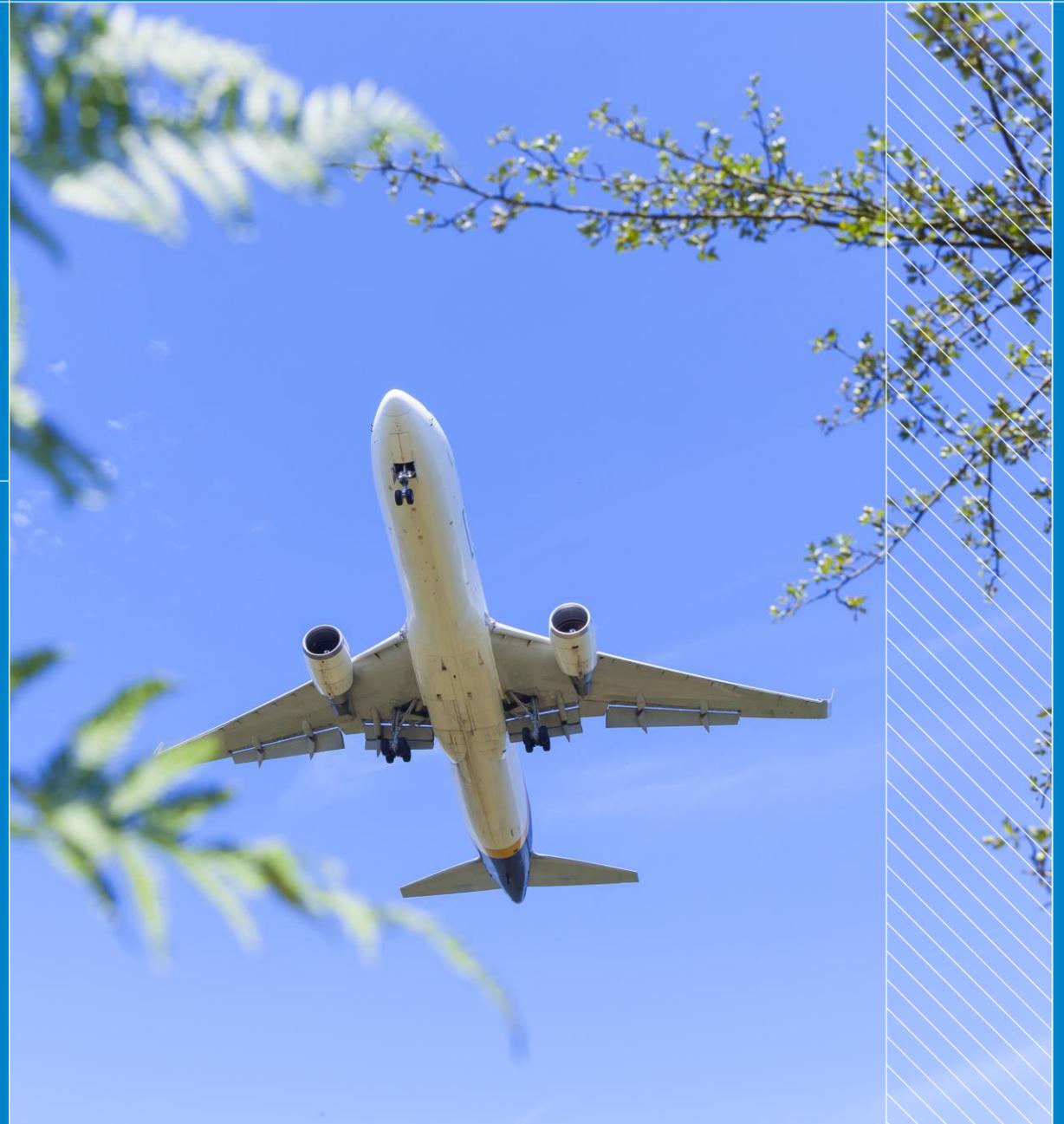


# EASA Experience regarding the systematic risk based EASA Level of Involvement (LOI)

Ralf Bader  
Chief PCM Initial  
Airworthiness



# Preparation before part 21 LOI implementation

- LOI Working Groups were established for
  - AMC/GM drafting
  - Advanced applications (volunteer DOA holders)
  - ASD (AeroSpace and Defense Industries Association of Europe)
  - Steering Committee (EASA + Industry)



- The outcome of all groups led to iteration loops and a mature risk based approach at the time of implementation.

# Preparation before part 21 LOI implementation

- Before the part 21 LOI amendment (Regulation (EU) 2018/897) went into force
  - All PCMs and Experts in EASA and NAAs were trained
  - 4 Roadshows took place in Europe to train the Industry
- Overall very positive feedback about
  - Early involvement of all stakeholders in a part 21 change
  - Provision of training before a part 21 change
  - The provided training itself

# LOI Field Experience

- Different ways of implementation were identified
  - Vast majority was acceptable
  - Depending on DOA holders' needs, meaningful groupings of design change/compliance demonstration (CDIs) are provided
    - From Document perspective – Bottom up approach (more CDIs)
    - From Change perspective – Top down approach (less CDIs)



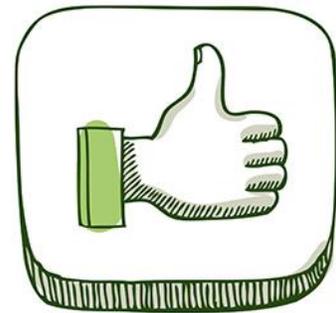
# LOI Field Experience

## → LOI specific Lessons Learnt

- The CDI reference should be linked in the compliance table of the certification programme with each CS, SC, ESF, MoC and compliance data package. Otherwise it is not ensured that all the details of a change are covered by at least one CDI.
- Complexity is dependent on the design, the specification, the means to demonstrate compliance, the possibilities of interpretation, etc. Complexity is independent of experience, novelty, how often something was already practiced
- The LOI proposal does not stop with a Risk Class but if compliance data is proposed as retained or not retained by EASA.

# LOI Field Experience

- Some process adaptations on DOA holder sides based on EASA DOA teams' feedback at the time of industry implementation
- Some delays due to COVID19 crisis
- Overall experience is very good
- Introduction is considered as very smooth based on the preparation that was invested by all stakeholders
- Good compromise between meaningfulness and complexity of the process
- Efficiency gain in the process by
  - investing more time at the beginning of a project,
  - saving more time at the end of a project than invested at the beginning and reducing friction at the usually more stressful end of a project



# Feedback

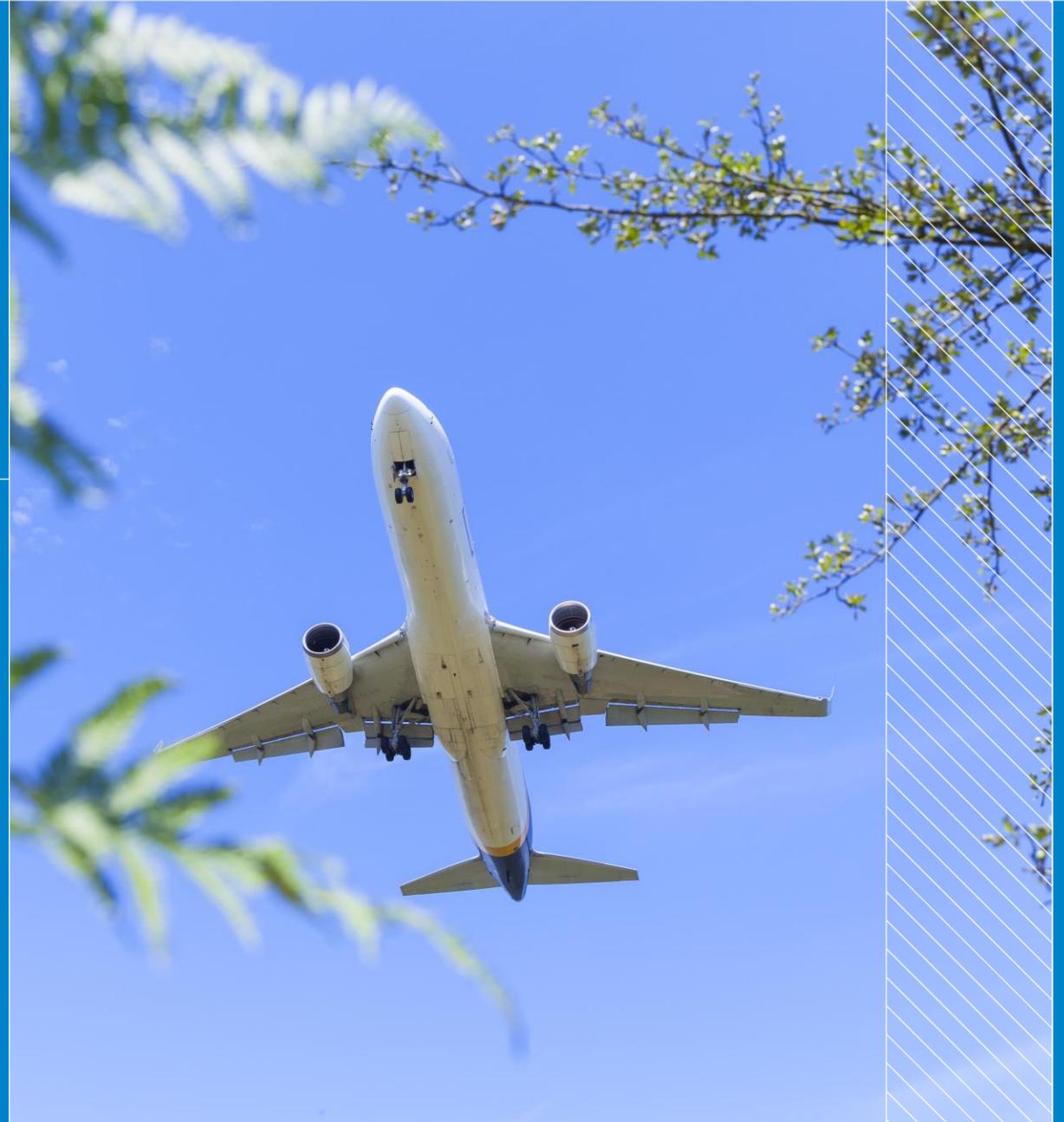
- Good example how industry and agency can work together taking into account all stakeholders aspects and keeping all stakeholders informed to ensure a smooth implementation.



- **Thanks to all who contributed to this successful implementation**

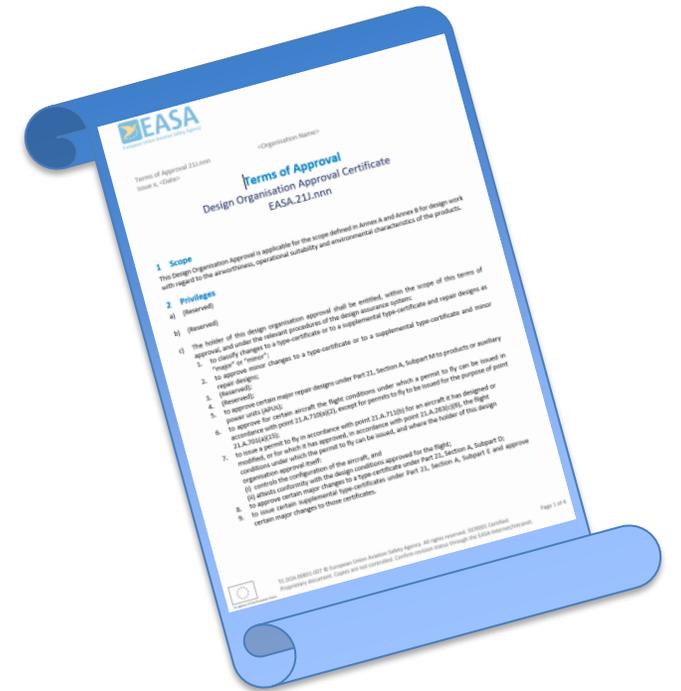
# EASA Experience regarding the introduction of certain major repair, major change, STC privileges

Rob Boersma  
Senior DOA Team  
Leader



# New privileges - Reminder

- New privileges were made possible for DOAs:
  - *Certain major repairs (21.A.263(c)(5));*
  - *Certain major changes (21.A.263(c)(8));*
  - *Certain STC (21.A.263(c)(9)).*
- “Certain” is defined through AMC/GM
- Projects for which the involvement of EASA is not necessary:
  - Known repetitive projects, previously applied for, and
  - Good DOA performance, and
  - Low or very low risk (LOI risk analysis).
- No added safety benefit to review compliance demonstration



# Lessons learned (1)

- Already some DOA holders have new privileges → TCH, STCH
- Several applications on-going
- AMC and GM provide very good guidance
- Privileges not always understood:  
Only applicable for repetitive low risk projects for which the DOA demonstrated good performance; not a blank cheque
- Need for recent reference project(s) done under LOI principles



# Lessons learned (2)

- Following elements need to be clearly demonstrated
  - Repetitiveness of the certification process
  - Very low or low risk for each CDI
  - Good DOA panel specific performance in the reference project(s)
- Limitations apply (AMC No 1 par 1.1 / 2.1)
- Justification document
  - Documents how the DOA fulfills the requirements
  - Checklist to determine whether a particular project can be done under privilege
  - Quality of justification document is key for a successful application

# Application tips

- Determine internally whether there is a business case for new privileges
- Discuss intent with DOA Team Leader
- Apply for a project noting that it will be used as reference project
- Build procedures using AMC/GM as basis
- Create justification document addressing all necessary points of AMC
- Communication is key to a successful application!





**THANK  
YOU**

