EASA
European Union Aviation Safety Agency

Product Certification and Design Organisation Approval Workshop 2019

Rulemaking Activities Affecting Part 21: Update

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Content

- → Regulatory changes in the past 12 months
- → Overview status of ongoing Part 21 RMTs

Recent regulatory changes in Part 21 & the AMC/GM

Recent amendment of Part 21

by Regulation (EU) 2019/897 based on EASA opinions

- 7/2016 (RMT.0262, LOI),
- 9/2017 (RMT.0513/0514, CAEP/10),
- 1/2017 (RMT.0393, maintenance check flights)

Upcoming amendment of Part 21

to align with recent amendment of Regulation (EU) 1321/2014 by Regulation (EU) 2018/1139 based on EASA opinions 5/2016 (Part ML) and 6/2016 (SMS in Part M), and correcting certain mistakes

Recent amendments to the AMC/GM

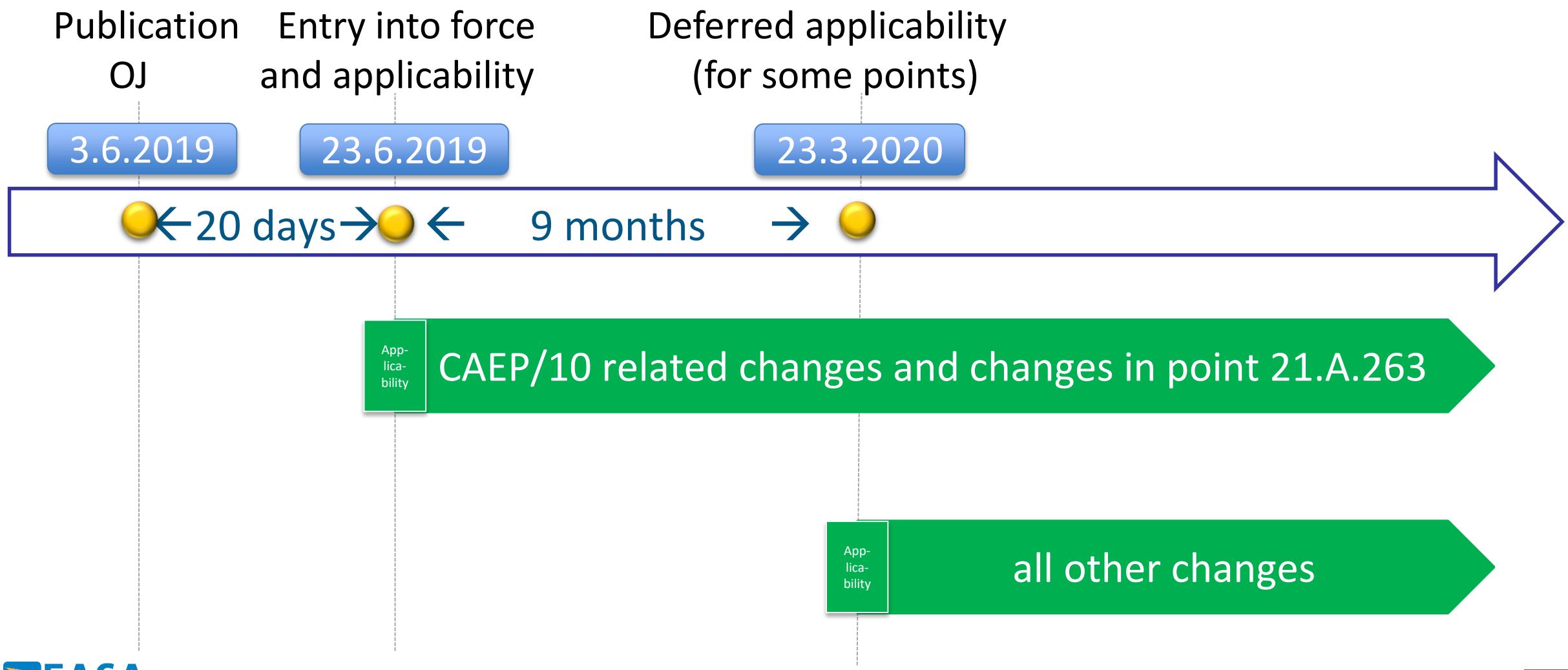
Issue 2 amendment 8

- Part 21 proportionality (RMT.0689)

Issue 2 amendment 9

- Supporting the application of the requirements introduced by Regulation (EU) 2019/897 (RMT.0262 LOI, RMT.0513/0514 CAEP/10, and RMT.0393 maintenance check flights)

Regulation (EU) 2019/897 - Applicability



How to learn more about Regulation 2019/897?

→ EASA website

→ EASA information sessions organised through H2/2019

Location	Date	# of participants	# of organisations
Rome	25-26/6/2019	64	28
Prague	3-4/9/2019	83	42
Cologne	18-19/9/2019	120	71
Toulouse	30-31/10/2019	100	56
	Total	*367*	*197*

Overview of ongoing Part 21 RMTs

→ Ongoing Part 21 rulemaking activities are aiming at

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establishing more proportionate rules addressing the initial airworthiness of 'GA aircraft'

Overview of ongoing Part 21 RMTs

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Implementing the changes in the new basic Regulation to the substantive requirements for airworthiness and environmental protection

increasing the level of safety by introducing for approved organisations a more proactive …

establishing more proportionate rules addressing the initial airworthiness of 'GA aircraft'

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Overview of ongoing Part 21 RMTs

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P2I

Implementing the changes in the new basic Regulation to the substantive requirements for airworthiness and environmental protection

establishing more Proportionate rules addressing the initial airworthiness of 'GA aircraft'

increasing the level of safety by introducing for approved organisations a more proactive System for managing Safety risks

RMT.0727 Implementation of the NBR

Simpler, lighter, better rules f
General Aviatio

Objective: To revisit Part 21 in view of the amendments to the Basic Regulation (NBR). The focus of this task is to introduce simple rules that will allow to apply a proportionate approach. It will take into account the various risk levels in GA in the initial airworthiness process, and is aiming at achieving a reduction of administrative burden and costs, while at the same time supporting GA innovation. The task will include the preparatory work done under RMT.0689 'Part 21 proportionality'. In the first phase of this RMT, EASA will develop proposals required by NBR Article 140 (3) and a few other topics, such as a proposal for the certification of non-installed equipment. In a second phase EASA will develop proposals for implementation of aspects of the NBR requiring a change of Part 21.

Driver: Efficiency/proportionality
Action Area: General aviation; Design and Manufac.
Priority: Strategic
Int. harmonisation: No
RM Procedure: Standard and Accelerated
RM Group: No

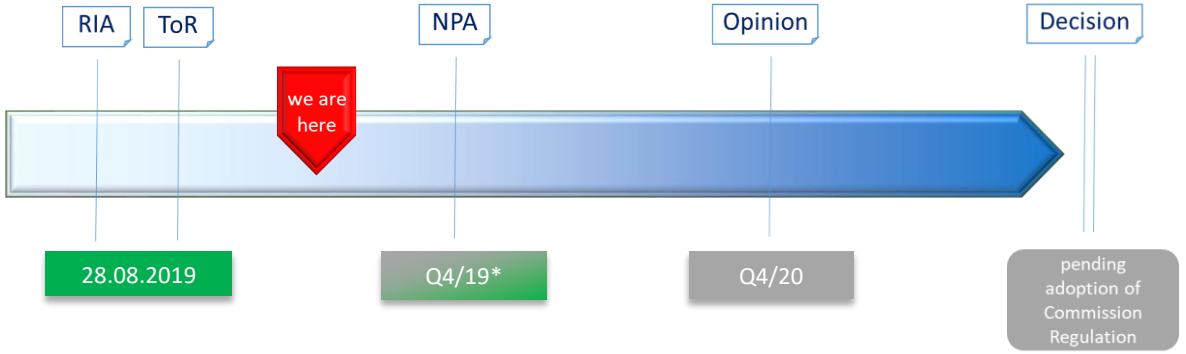
Will (propose to) amend:

Part 21

AMC/GM to Part 21

Comments: Two focussed consultation workshops have already been organised to discuss with affected stakeholder the initial concept for simple and proportionate rules for GA. Further workshops will be organised. Other aspects of the RMT, such as non-installed equipment, will be consulted through an NPA or dedicated focussed consultation workshops.

Rulemaking Process:



*various different consultation mechanism between Q2/19 and Q2/20

RMT.0018 Parts without EASA Form 1

Simpler, lighter, better rules f
General Aviatio

Objective: Components can only be installed if accompanied with EASA Form 1 or equivalent (except standard parts and raw material). Some parts are not designed or manufactured specifically for aviation use (light bulbs, fire axes, smoke detectors,…).

The objective is to establish a more proportionate and efficient requirement to allow the installation of components based on the safety consequences should the component fail. It should allow that parts with lower criticality would not need an EASA Form 1 when used as spare part for installation during maintenance.

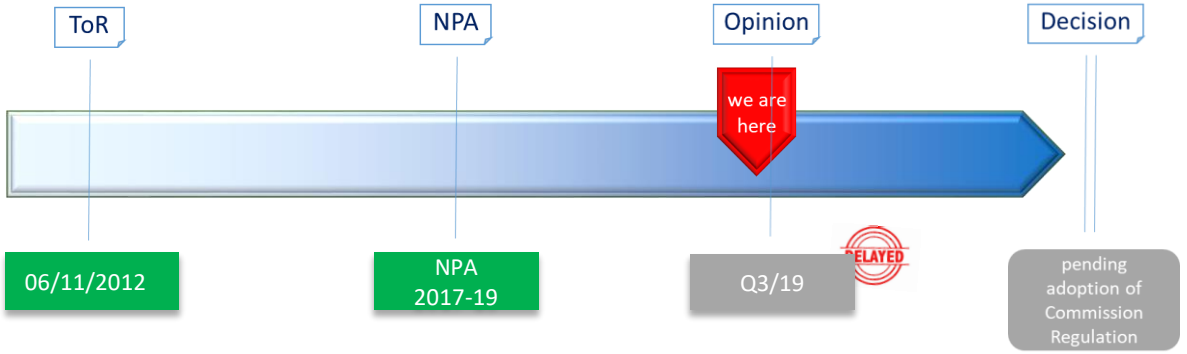
Driver:	Efficiency/proportionality
Action Area:	Maintenance Organisations
Priority:	Standard
Int. harmonisation:	No
RM Procedure:	Standard
RM Group:	Yes

Comments: Based on the comments received and after discussion with the advisory bodies, EASA amended the proposal of four risk classes.
Common opinion on RMT.0018 and RMT.0252.

Will (propose to) amend:

- Part 21
- AMC/GM to Part 21
- Part-M
- AMC/GM Part-M
- Part-145

Rulemaking Process:



RMT.0251 Embodiment of SMS (phase 2)

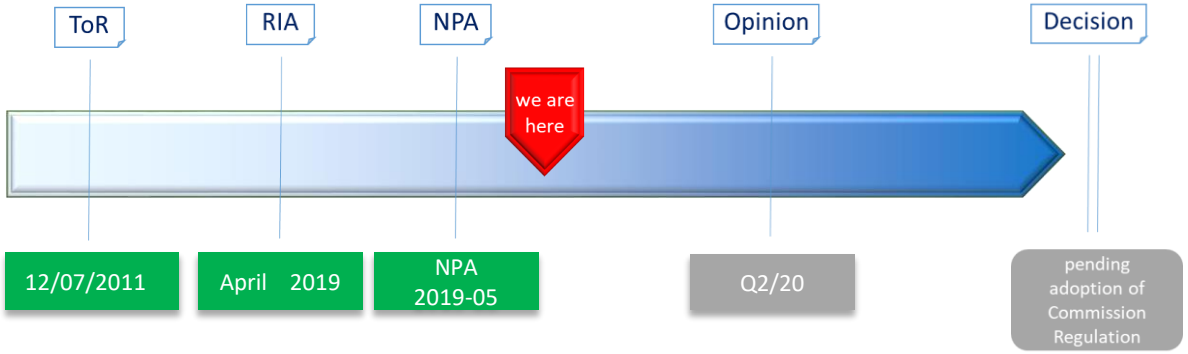
Objective: With reference to ICAO Annex 19, the objective is to set up a framework for safety management in the initial and continuing airworthiness domains.

Driver: Safety
Action Area: Safety management
Priority: Strategic
Int. harmonisation: Yes
RM Procedure: Standard
RM Group: No – but expert group

Comments: EASA intends to align the principles of SMS in all domains, therefore this RMT will consider the existing SMS requirements in the EASA system. Extensive discussion with expert group and advisory bodies to ensure a proportionate approach and to apply performance based regulation, as well as allowing design and production organisations to demonstrate compliance by showing compliance to SMS industry standard.

Will (propose to) amend:

Rulemaking Process:



RMT.0252 Instructions for Continued Airworthiness

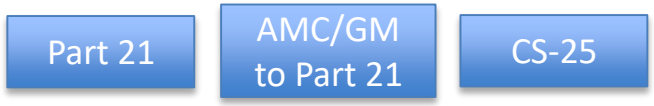
Objective: To establish clear requirements and responsibilities for all parties involved in the production of ICAs, their approval and their implementation.

Structure of the RMT: The task is split into two phases. Phase 1 addressed certification maintenance requirements affecting CS-25 and is completed. Phase 2 addresses the definition and completeness of ICA, the availability of ICA and the acceptance of ICA.

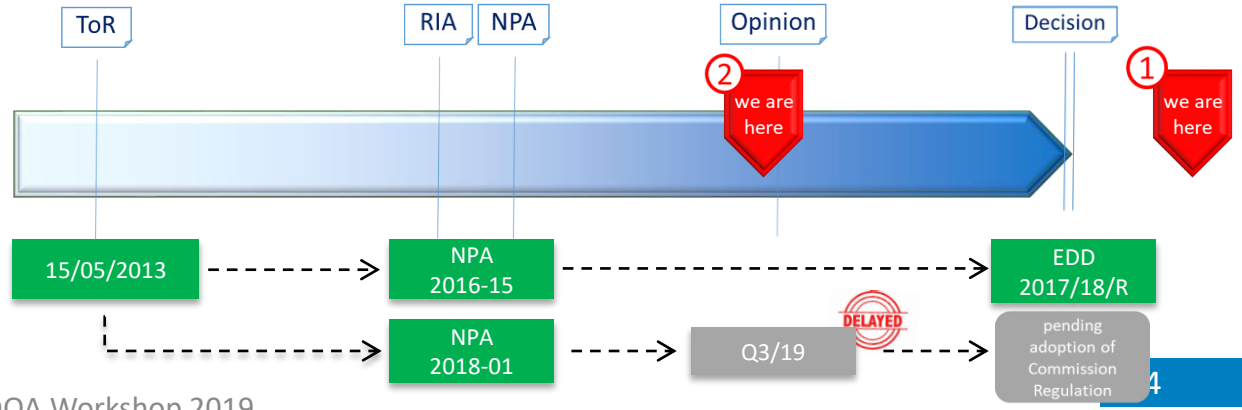
Driver: Level playing field
Action Area: Manufacturers (design and production)
Priority: High
Int. harmonisation: Yes
RM Procedure: Standard
RM Group: Yes

Comments: Phase 1 is terminated. Phase 2: common opinion on RMT.0018 and RMT.0252.

Will (propose to) amend:



Rulemaking Process:



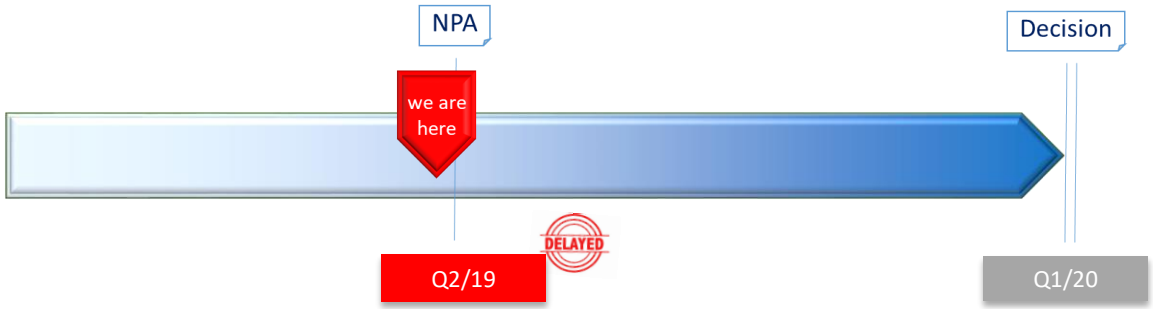
RMT.0031 Regular update of AMC/GM to Part-21

Objective: To regularly address miscellaneous issues of non-controversial nature, which are required to ensure that the AMC/GMS are fit for purpose, cost-effective, can be implemented in practice and are in line with the latest ICAO SARPS. In particular, a regular update is used to transpose certification memoranda and other material supporting the application and interpretation of Part 21 as established by EASA, and to address non-complex and non-controversial issues raised by stakeholders.

Current Cycle

Subjects

All candidates related to the AMC/GM affecting design organisations; incl. proposals from ASD WG4



RM Procedure: Standard

Comments

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Next Cycle

Starting 2021: All candidates related to the AMC/GM affecting production organisations

RMT.0262 Embodiment of LOI into Part 21

Objective: Introduction in Part 21 of a risk-based approach for the determination of the level of involvem of EASA in product certification. This entails introduction of a systematic risk management (hazard identification, risk as nd mitigation); performance-based oversight allowing to focus on areas of greater risk; safety awareness and all staff involved; and improved effectiveness and efficiency of Part 21 achieved by their streamlining and impr

completed

Driver: Safety
Action Area: Safety management
Priority: Strategic
Int. harmonisation: No
RM Procedure: Standard
RM Group: No – but steerin

end:

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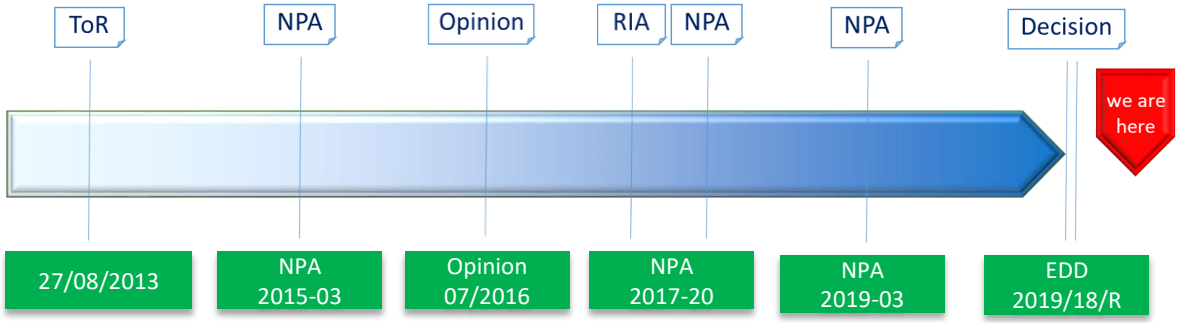
AMC/GM to Part 21

Comments: EASA developed GM initially proposed in NP mendments that were introduce Part 21 compared to the EASA opinion 07/ posals were consulted with NPA 2019-03. Commiss ation 2019/897 amended Part 21, EASA now prepares t inal decision for the related AMC/GM.

Rulemaking Process:



Prospective changes to Part 21 & the AMC/GM

Consultations upcoming

RMT.0031 regular update of AMC/GM to Part 21

Consultations recently closed

RMT.0251 SMS

Opinions pending adoption

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drafting → consultation (e.g. NPA) → Review of comments and finalisation → Opinion / Decision → Commission Review and MS experts group → Adoption

Consultations ongoing

RMT.0727 implementation of the NBR – w.r.t. the aspect of simple and proportionate rules for aircraft used for sports and recreational activities

EASA Opinions coming soon

RMT.0018 Parts without Form 1

RMT.0252 Instructions for continued airworthiness

EASA
European Union Aviation Safety Agency

Thank you for your attention!

Questions are welcome.

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