EASA
European Union Aviation Safety Agency

Product Certification and Design Organisation Approval Workshop 2019

New major privileges

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The new privileges

The new privileges introduce a possibility for DOA holders to obtain, under strictly specified conditions, new privileges to:

- Certify certain **major changes** to a TC or STC
- Issue certain **STCs**
- Approve certain **major repair** designs

For projects that compared to previous projects:

- Are **Similar** in design
- Are **Repetitive** in certification process
- DOA has shown **Good performance**
- Have **Low LOI likelihood**

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New privileges in point 21.A.263

[…] (c) A holder of a design organisation approval shall be entitled […]

5. to approve certain **major repair designs** under Subpart M to products or auxiliary power units (APUs); […]

8. to approve **certain major changes** to a type-certificate under Subpart D; and

9. to issue **certain supplemental type-certificates** under Subpart E and approve certain major changes to those certificates.

The relevant guidance

AMC No 1 to 21.A.263(c)(5)(8)(9)	• Explains the scope of the new privilege • Explains the criteria for limitation and eligibility of the new privilege
AMC No 2 to 21.A.263(c)(5)(8)(9)	• Provides the process for obtaining and using the new privilege • Provides the process to extend the privilege
GM on 21.A.263(c)(5),(8),(9)	• Provide an example of numbering system for approval of STCs, major changes/repairs issued by DOA holders under the new privilege, and information to be sent to EASA
EASA DOA Dept. internal policy	• Provides further guidance to DOATL on how to investigate for the new privileges • The document is available on request (DOATL)

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Scope and criteria – Changes/STC

- Point 21.A.263(c) does not provide the possibility to receive a privilege for just any major change / STC;
  it limits the privilege to ‘certain’ major changes / STC:
  - changes similar to those that have been previously approved by EASA for the same DOA holder
  - meet the ‘eligibility’ criteria

Scope and criteria – Repairs

- "Certain" major repairs:
  - Major repairs by (S)TC-holder
    - Limitations on use of privilege:
      New interpretation of certification basis;
      Application of a CS that is different from the one used for type certification
  - Major repairs by another DOA under certain conditions
    - Conditions are the same as for major change / STC

Major changes/STC not eligible for a privilege

Revision of TCDS

Amendment to the existing certification basis

Revision of ALS or Ops limitations*

* unless otherwise agreed with EASA

changes triggered by an AD

AMOC to an AD

Major changes/STC not eligible for a privilege

significant changes

(ref to 21.A.101)

more conservative requirements compared to the reference change(s)

Noise and/or emissions characteristics are affected*

* unless otherwise agreed with EASA

critical characteristics
or
single failures with catastrophic effects

Engines/propeller:

single failures with hazardous effects

non-compliance in referenced change

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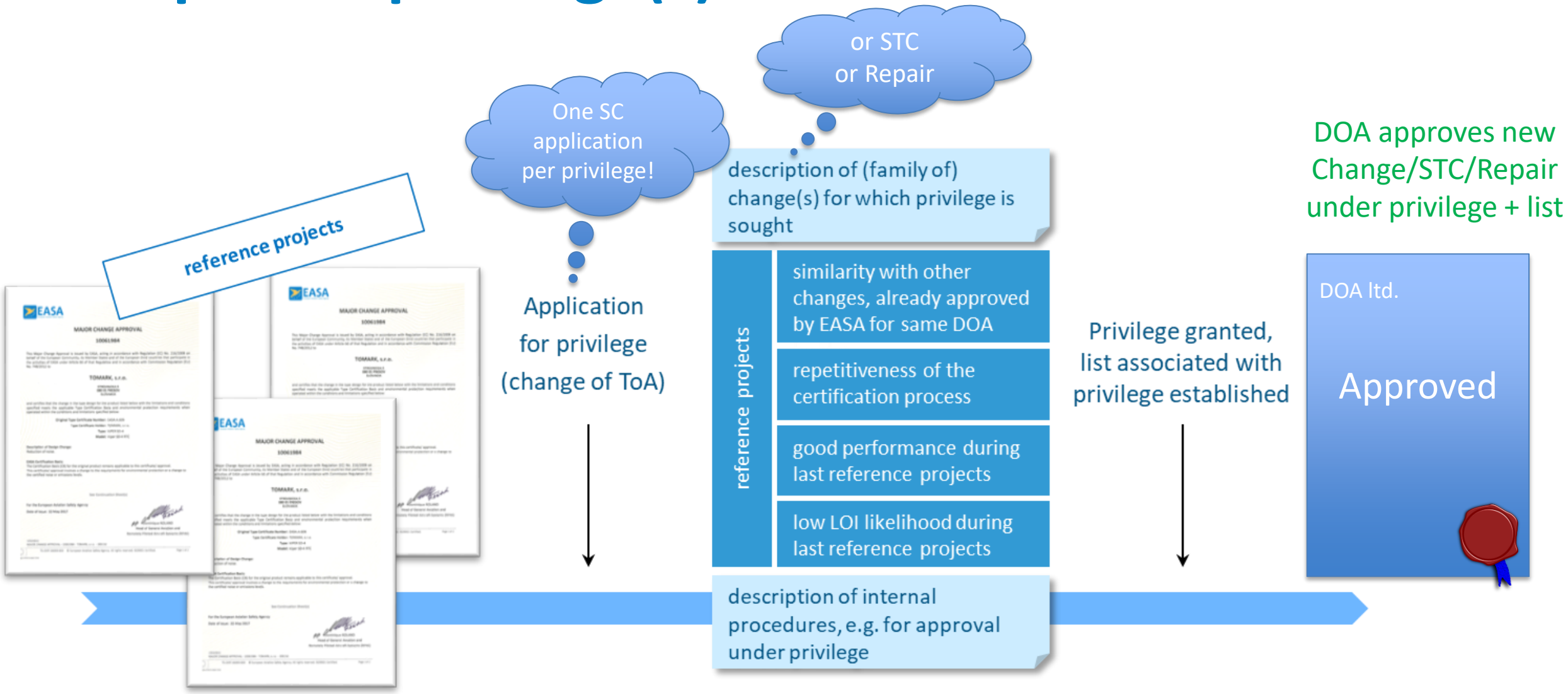
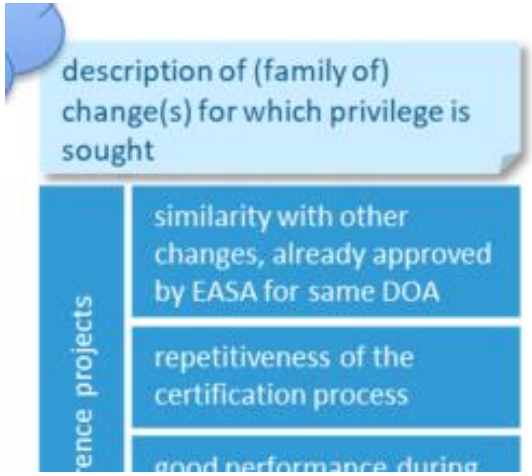
Principles of privilege(s)



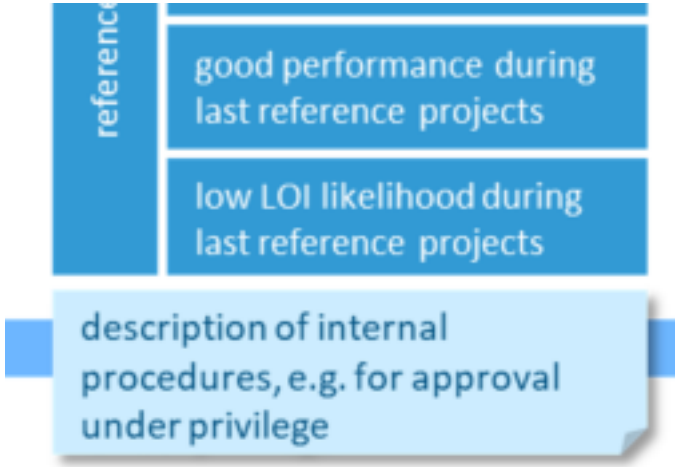
Conditions for issuing the privilege

- **Reference projects**: major changes / STCs approved by EASA in the past
- **Similarity**: The design, installation and operation are basically the same as in such reference projects
- **Repetitiveness of the certification process**: The certification process is repetitive, i.e. identical to, or part of, the already approved referenced project(s)



Conditions for issuing the privilege

- **Performance and experience** in previous projects
  - ‘medium’ or ‘high’ level of performance during at least the latest project referenced, to demonstrate ‘similarity’ and ‘repetitiveness’
  - ‘low’ or ‘very low’ likelihood of an unidentified non-compliance for all the groups of compliance demonstration activity and data (CDIs)



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Process for issuing the privilege

- In order to obtain the privilege, DOA holders need to apply for an amendment of the TOA of their DOA
  - Application with Form 82
  - Provision of related procedure
  - Establishing "List associated with the privilege" (defining the projects)
  - Provision of the "justification document" per certain change/repair
  - EASA assessment of acceptability by DOA TL, PCM, Experts
- Update of TOA
  - Addition of privilege
  - Limitation to refer to "list associated with the privilege"

Justification Document

- Reference project(s)
- Compliance with criteria
- Certification Programme
- Related possible types and models, exceptionally for a dedicated product if the type/model has no technical influence
- List of requirements and corresponding certification process if not identical to referenced certification programme
- Detailed description
- Any other limits on the use of the privilege

Extending the privilege

- In order to later add new major changes, major repairs or STCs to the privilege, they need to be included in the 'list associated with the privilege'
  - Repairs by S(TC)-holders: Unchanged
  - Repairs by non S(TC)-holders, Changes, STC's:
    - Check eligibility
    - Provide justification document
    - EASA acceptance
    - Update of the "List associated with the privilege"

No TOA update!

Flow charts

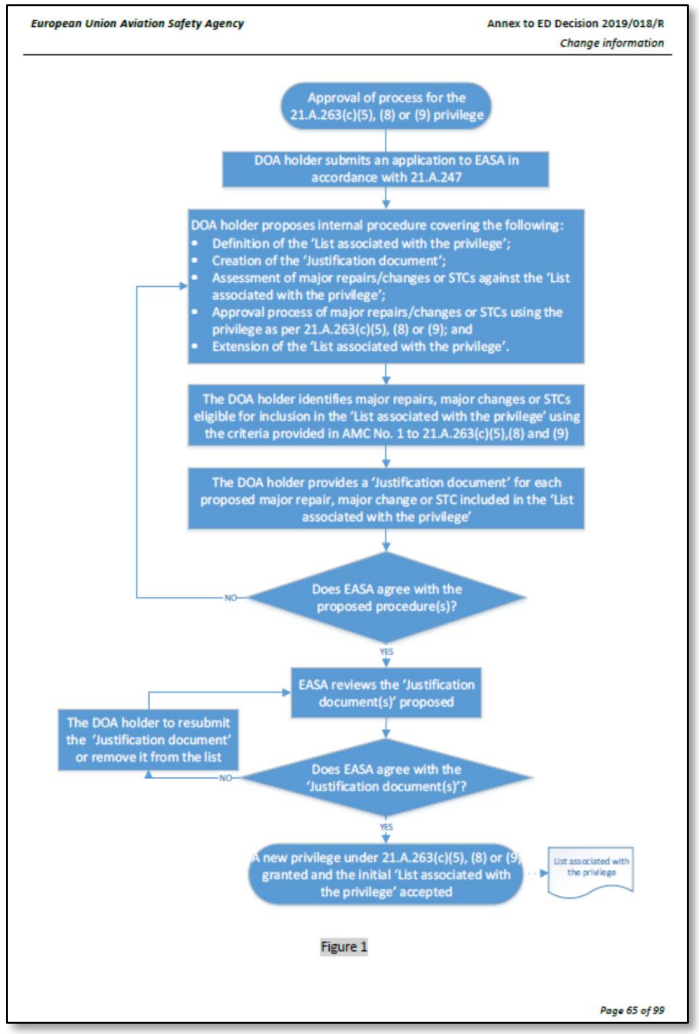

Figure 1

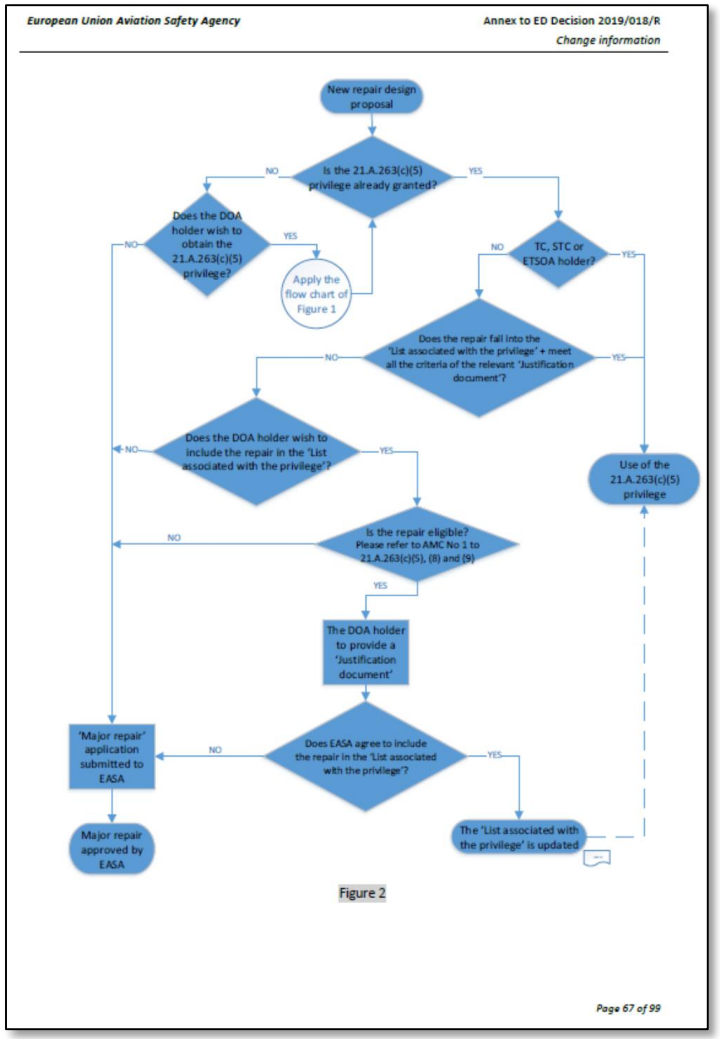

Figure 2

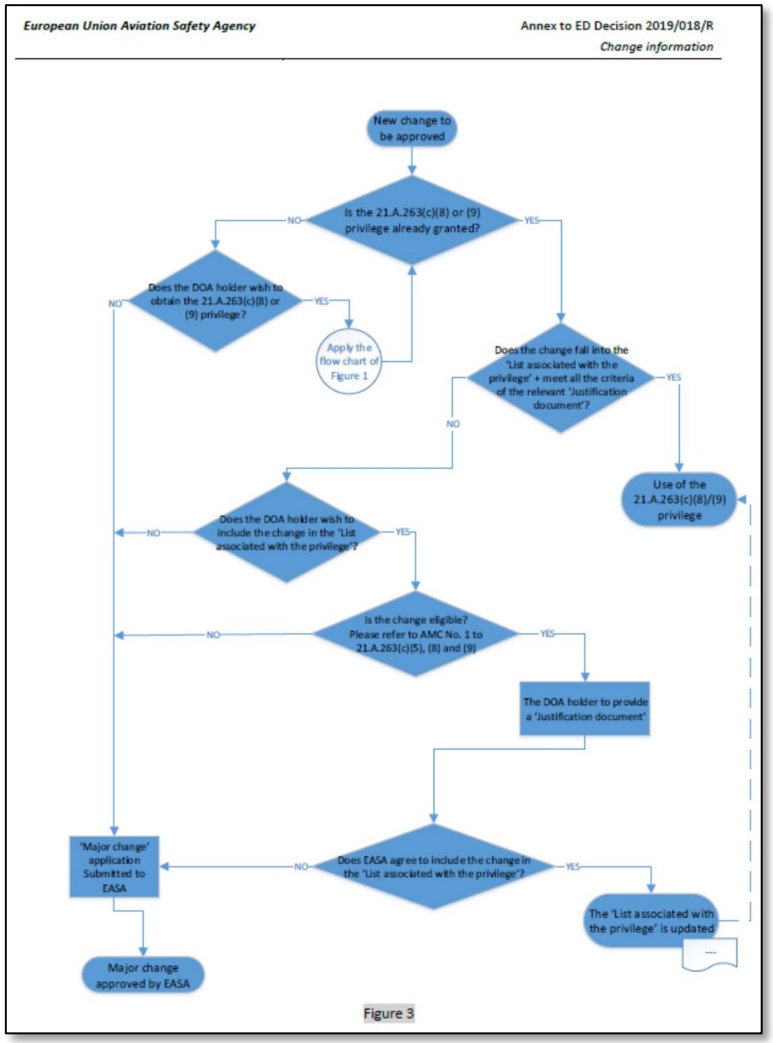

Figure 3

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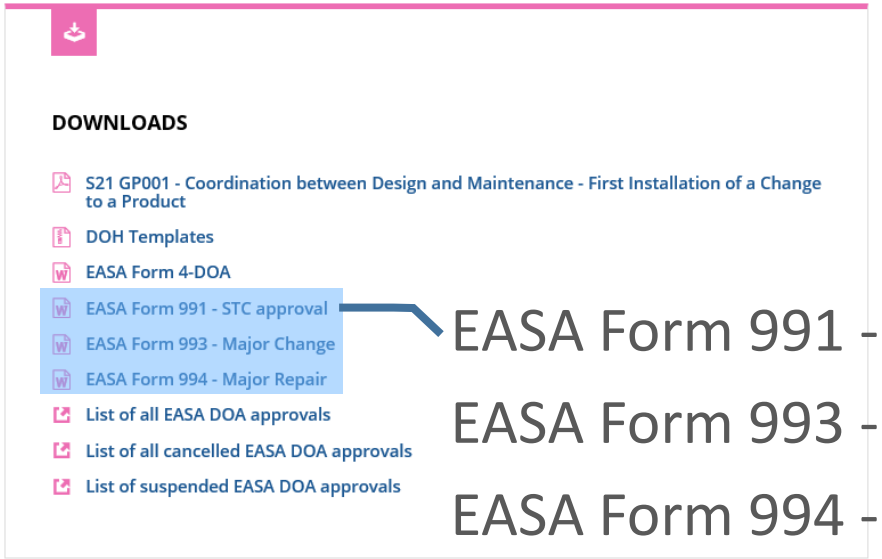
Further guidance

or MCH
or MRE

- Numbering system proposed: 21J999STC17—001A
- Approval forms proposed:



EASA Form 991 - STC approval
EASA Form 993 - Major Change
EASA Form 994 - Major Repair

- Some more details in the internal policy
- Discuss with your DOATL

EASA
European Union Aviation Safety Agency

Thank you for your attention!

Questions are welcome.

easa.europa.eu/connect

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