EASA
European Union Aviation Safety Agency

Product Certification and Design Organisation Approval Workshop 2019

Feedback from Airlines side meeting

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Your safety is our mission.

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The Group
(left → right)

- → Olivier Chevalier, Airbus, Beluga
- → Michael Hilger, Cargolux
- → Dagmar Elten, LHT
- → Fares Fares, EASA
- → Damian Kocjancic, EASA
- → Ana Costa, TAP
- → Thomas Ohnimus, EASA (partly)
- → Peter Dol, KLM
- → Dilek Senay Yazici, Etihad Engineering
- → Pawandeep Kalyan, EasyJet
- → Gabriel Cheng, BA

What did work well

- → Open and honest discussion
- → Good participation
- → Flexibility of agenda
- → Availability of experts
- → Very supporting moderation

Issues encountered

- → Formal feedback / response to actions and issues raised during this and previous side meetings missing
- → Follow up as proposed agenda item for next year

Main Topics

- → Compliance Demonstration by Similarity
- → Repair Approvals from non TC Holder OEMs
- → Generic Repair
- → EPA Marking
- → Form 1 re-issue after STC

Compliance Demonstration by Similarity

- → Showing compliance by similarity is depending on the project
- → Finding at one DOA: Compliance demonstration using similarity was not accepted though given acceptance by PCM
- → Other DOA could approve the project (no finding)
- → Recommend DOAs to have a library of TC holders approvals
- → No equal level playing field for all EASA DOAs

Repair Approvals from non TC Holder OEMs

- → OEM (2nd level design authority of TC holder) did install repairs
- → Previous owner accepted these repairs (non TC Holder) under non EASA regulation without Bilateral
- → EASA / EU is requested to accept minor changes and minor repairs from all properly regulated authorities and not only from USA, Canada and Brazil (eg: Singapore)

Generic Repairs for a TC

- → Usually developed if damages occure more often to support Maintenance
- → Are acceptable if the repair is clearly defined with its applicability and limitations
- → EASA position is requested for consistency by all DOA TL, e.g. document within the FAQs

EPA Marking – old friend ?

- → Different interpretation of EPA Marking by DOA TL for Airlines
  - → Parts put on the stock / Wiring / Carpets cut to fit in the aircraft…./ which kind of marking, etc.
  - → Too many problems due to different interpretations
- → No level playing field FAA/EASA
- → Increased safety is not visible
- → EASA is requested to re-evaluate the use of the letters „EPA“
- → If the safety benefit of the regulation cannot be demonstrated it should be deleted

Form 1 re-issue after STC before RTS

- Prototype parts installed on Prototype STC aircraft delivered with CoC (EASA Form1 or 8130-3 Prototype)
- Upon STC issue
  - DO states that all prototype parts are approved
  - FAA Form 8130-3 prototype automatically change status to „approved“
  - EASA POs are allowed to recertify the part without shop visit
- Still, some MO are forced by their NAA to request a Form 1 re-issue as „approved“ without any safety increase
- EASA to take a similar approach as the FAA (order 8130-21H) / CAA UK leaflet B-110 (2011)

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and us….

Thank you!

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