



**European Union Aviation Safety Agency**  
**Comment Response Document (CRD) to Special Condition ref.**  
**SC-E25.963-01 Issue 01 on**  
**“Installation of Conformal Rear Centre Tank – Crashworthiness**  
**Conditions” dated 8 May 2023**

**1. Summary of the outcome of the consultation**

During the public consultation of the above referenced proposed Special Condition from 8 December 2022 to 27 January 2023, EASA has received:

- 5 comments
- from 4 different commenters.

**2. Individual comments and responses**

<b>(General Comments)</b>	-
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comment	1		comment by: <i>LBA</i>
		LBA:  The LBA has no comments.	
response		<b>Noted — Thank you for your above confirmation.</b>	

comment	2	comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i>	
		<b>General</b> Thank you for the opportunity to comment on SC-E25.963-01_Issue-01 - Installation of Conformal Rear Centre Tank – Crashworthiness Conditions. Please be advised that there are no comments from the Swedish Transport Agency.	
response		<b>Noted — Thank you for your above confirmation.</b>	

comment 3 comment by: FOCA (Switzerland)

Thank you for the opportunity to comment. No comments from the side of FOCA.

response **Noted — Thank you for your above confirmation.**

comment 4 comment by: Federal Aviation Administration (FAA)

The FAA would like to express its appreciation for EASA’s work developing its special condition and consideration of previous FAA comments. While the FAA agrees that additional guidance for fuel tank crashworthiness is appropriate, the FAA is taking a different approach. The FAA establishes acceptable means of compliance with the introductory requirement in Title 14, Code of Federal Regulations 25.963(d), and focuses on ensuring that the applicant makes every practicable consideration to ensure protection of fuel tanks in more severe crash conditions that exceed, or are not captured by, the conditions specified in § 25.963(d)(1) through (d)(5), especially tanks located in the fuselage below the main cabin floor.

response **Noted - and thank you for the contributions and close co-operation.**

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comment 5 comment by: Federal Aviation Administration (FAA)

Referenced Text:  
*"The sole existing guidance addressing the protection of fuel tank in fuselage is the FAA AC 25-8."*

Comment/Rationale or Question:  
Additional guidance is available in FAA AC 25-30, Fuel Tank Strength in Emergency Landing Conditions, and clarifies that the introductory statement of § 25.963(d) is in addition to the quantitative criteria in §25.963(d)(1) through (d)(5).

Proposed Resolution:  
Add the following information to the special condition background:  
AC 25-30, Fuel Tank Strength in Emergency Landing Conditions, reiterates much of the guidance in AC 25-8, and includes the following:  
*"Survivable landing conditions may occur that exceed, or are not captured by, the conditions specified in § 25.963(d)(1) through (d)(5). Therefore, to meet the introductory requirement in § 25.963(d), every practicable consideration should be made to ensure protection of fuel tanks in more severe crash conditions. For example, as much clearance as possible should be*

*provided between fuel tanks and structure that can be crushed, or the tanks should be protected by primary structure not likely to be crushed.”*

response

Noted/Not Accepted. EASA AMC to 25.963(d) has not been fully harmonized with the FAA AC 25-30 on this aspect. Nevertheless, the EASA published Special Condition has included the pertinent elements of the AC 25-30 within the Special Condition and in particular, that survivable landing conditions may occur in excess of the conditions specified under 25.963(d), and practical consideration have been imposed to protect the RCT fuel tank. The text of the proposed Special Condition has not been changed based on this comment.