

CRD table of comments, responses and resulting text

In responding to the comments, the following terminology is applied to attest EASA’s position:

(a) Accepted — EASA agrees with the comment and any proposed change is incorporated into the text.

(b) Partially accepted — EASA either partially agrees with the comment or agrees with it but the proposed change is partially incorporated into the text.

(c) Noted — EASA acknowledges the comment, but no change to the text is considered necessary.

(d) Not accepted — EASA does not agree with the comment or proposed change.

(General Comments)	-
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comment	7	comment by: <i>LBA</i>
	LBA has no comments	
response	Noted.	

comment	8	comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i>
	General Thank you for the opportunity to comment on <i>CM-21.A-K-001 issue 2</i> . Please be advised that there are no comments from the Swedish Transport Agency.	
response	Noted.	

comment	9	comment by: <i>FNAM</i>
	Introduction	
	The FNAM (Fédération Nationale de l’Aviation et de ses Métiers) is the French Aviation Industry Federation, gathering the following members:	
	<ul style="list-style-type: none">• CSAE: French Handling Operators Professional Union• CSTA: French Airlines Professional Union (incl. Air France)• SNEH: French Helicopters Operators Professional Union• GIPAG: French General Aviation Operators Professional Union	

- GPMA: French Ground Operations Operators Professional Union
- EBAA France: French Business Airlines Professional Union

And the associated member: UAF (French Airports Professional Union).

General comments

We thank EASA for providing additional guidance on the derogations (b)(1)(2)(3) in point 21.A.307 of Commission Regulation (EU) No 748/2012 that allows the installation of parts and appliances without an EASA Form 1. In particular the issue 2 of the CM which is providing updated guidance, based on the changes introduced by Commission Regulation (EU) 2021/699 (section 3.1 provides an overview of the changes).

We understood that the intent of the derogation is to provide industry with flexibility for the acceptance of parts and appliances with different production background for installation during maintenance, without decreasing the level of safety.

Two new categories of new parts are permitted to be installed during maintenance of EASA registered aircraft without the parts being accompanied with an EASA Form 1, but with an alternative document instead:

- parts with negligible safety effect as identified by the holder of the design approval (according to 21.A.307(b)3);
- parts with negligible safety effect as identified by EASA in CS-STAN for standard changes/repairs (according to 21.A.307(b)4).

This will permit fabrication of the above parts by organisations which are not approved as production organisations (POA), which was considered too stringent for the manufacturing of parts having negligible safety impact in case of non-conformities.

For all the parts for which the DAH makes use of one of the derogations described in 21.A.307(b), as an alternative to the EASA Form 1, the rule requires a manufactured-issued document accompanying the part (for instance a certificate of conformity) to properly identify the part and trace it to the original manufacturer.

However, because of the COVID and the Ukraine war, general aviation is facing difficulties and we want to draw your attention on the spare parts shortage. For Part-145 organisations, it is more and more difficult to supply spare parts, and it would be easier to introduce a procedure (it could be an approved procedure) where Part-145 organisations could issue directly the certificate of conformity.

The explanation described in document CM-21.A-K-001 is very restrictive compare to the regulation itself, and it may increase the spare parts shortage.

FNAM already answered to NPA 2017-19 (02/03/2018). Unfortunately, answers provided by CRD doesn't meet our expectations. Please find below our suggestions:

- - A clarification is needed for components which do not require an EASA form 1. It is quite difficult to have the exact list of components which do not require an EASA form 1, indeed the type certificate holder doesn't provide the information, mainly for old aircraft type, before 2000. Due to no easier applicable solution for General Aviation, there will be in the near future more and more aircraft grounded.

A list of set of components which do not require an EASA form 1 would be appreciated.

- - More flexibility should be provided for PART-145 organisations. Since the managements system warrantees safe procedures, tools and documentation, Part-145 organisations should be allowed to establish EASA Form 1 from any spare parts (except for complex motor-powered aircraft and aircraft used by an air carrier licensed in accordance with Regulation (EC) No 1008/2008).

The GIPAG (French General Aviation Operators Professional Union) and FNAM (Fédération Nationale de l'Aviation et de ses Métiers) are available to discuss with EASA the possibility of improving this regulation, to help operators during this difficult context of spare parts shortage.

response

Not Accepted.

EASA do not agree to the comment for the following reasons:

Regarding the comment that "a clarification is needed for components which do not require an EASA form 1" and that "A list of set of components which do not require an EASA form 1 would be appreciated", EASA cannot provide such a list since it would not meet point 21.a.307(b)(3), since the derogation can be proposed only by the design approval holder. However, EASA is helping in this regard by providing more flexibility to General Aviation aircraft by establishing at CS-STAN parts that do not need an EASA Form 1 for certain Standard Changes/Repairs.

Regarding the statement asking for 'More flexibility should be provided for PART-145 organisations', in the opinion of the Agency the maintenance organisations are not necessarily knowledgeable about the safety implications of a non-conforming component and therefore, this determination is assigned in the rule to the holder of the approved design.

comment

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comment by: *Ahmet Furkan IBRAHIMOGLU*

Comment:

In a video explaining the regulation 2021/699, EASA has shown a fire extinguisher as an example which could be manufactured and installed using the derogation (21.A.307(b)(3)-(6)).

I am confused as to how a critical equipment such as fire extinguisher can be an example (considering its safety effect) for this derogation?

Justification:

When considering the criteria given in GM1 of 21.A.307(b)(3) & (b)(4), I do not understand how such equipment can be used in accordance with this regulation?

response

Noted.

Thank you for your comment.

It is understood that the comment does not propose changes to the CM, it rather asks for explanation.

The mentioned EASA presentation, addressed hand held Fire Extinguishers as just an example of non-aviation parts, for which it could be acceptable to not request a specific aviation authority approval (e.g. ETSO) but it could be sufficient to have evidence that the design of such part meets industry standards, as defined in AC 20-42D, e.g. US – UL standard 711..

That fire extinguisher is therefore an example where the risk of a non conformity can be reduced with specific verification activity of the installer who would need to check that the part meets an accepted industry standard.

comment

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comment by: *Ahmet Furkan IBRAHIMOGLU*

Attachment [#1](#)

Comment:

During the EASA & FAA AM Event in 2021, there were consecutive pages related to "parts without Form 1" and parts manufactured with AM in same slides. But since there is no video of the event, it is not really possible to confirm that EASA has provided the examples (attached figure) to combine 2 subjects (i.e. parts without Form 1 and parts manufactured with AM).

Proposed

Text:

Can EASA confirm that attached figure (extracted from the Event) be used for 21.A.307(b)(3)-(6) ?

response

Noted.

Thank you for your comment.

It is understood that the comment does not propose changes to the CM, it rather asks for explanation.

The attached figure is from a presentation provided by EASA on the subject of Additive Manufacturing. The latest available guidance on the topic is provided though CM-S-008 "Additive Manufacturing" issue 3 (dated 30 April 2021). The figure cannot be used as such to

directly justify the use of the derogation since it was simply used for discussion purposes associated with developing guidance and standardisation which includes some common aspects with this CM (CM-21.A-K-001, issue 2), i.e. EASA is working towards certification effort being proportionate to 'criticality'. Until better standardisation is achieved regarding the definition of 'criticality' and expectations associated with proportionate Means of Compliance, the subject for any particular application is likely to continue to be assessed on a 'case by case' basis.

Note: The discussion between the industry and regulators regarding the 'criticality' definition continues, e.g. ASTM F3572-2 'Standard Practices for Additive Manufacturing – General Principles – Part Classifications for Additive Manufactured Parts Used in Aviation'. EASA also continues to develop the connection between the two topics and will provide guidance accordingly in the mentioned CM. The next revision of the CM-S-008 will include reference to this CM-21.A-K-001. The process will be shared more broadly in various workshops etc., as usual.

comment

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comment by: *Ahmet Furkan IBRAHIMOGLU*

Comment:

According to Foreign Part-145 User Guide - Fabrication of Parts, it is possible to fabricate some parts under the Part-145 approval. However, parts fabricated using this User Guide have limitations, rightfully so. Can soft items/NTFs (such as carpet) be manufactured by using the derogation in 21.A.307(b)(3)-(6) instead of using the Part-145 approval?

Justification:

Fabricated parts under the Part-145 have limitations for storage and quantity. It could be useful to manufacture such parts by using the derogation instead of Part-145 regulation.

response

Noted.

EASA acknowledge the comment. The assessment of the applicability of the derogation shall be done by the installer case by case.

Fabrication of a restricted range of parts for the own use by an organisation approved in accordance with Part-145 is permitted in paragraph 145.A.42b(iii). The related AMC provides relevant information.

There are no requirements in 21.A.307(b) that need to be fulfilled by the organisation manufacturing such parts. Therefore, it is not expected to hold any manufacturing or maintenance organisation approval by that company manufacturing 21.A.307(b)(3) parts. Having a maintenance organisation approval, of course, does not disqualify the organisation to manufacture the 21.A.307(b)(3) parts. Such parts should not be issued an EASA Form 1.

It is however worth mentioning that while the understanding of the restricted parts is provided in the mentioned AMC for 145.A.42 b(iii), the parts that can be manufactured using 21.A.307(b)(3) require their identification by the DAH when fulfilling certain conditions.

For an item like a carpet, for example, the installation without form 1 can be accepted if the necessary flammability requirements are met, according to the information provided in the ICA.

Indeed, the AMC1 21.A.307(b)(3) and (b)(4) states:

"[...] To prevent a non-negligible safety effect on the product, due to the installation of a part or appliance referred to in point 21.A.307(b)(3) and (b)(4) that could potentially not conform to its design, the design approval holder (DAH) or EASA may identify in the ICA (in the case of 21.A.307(b)(3)) or in CS-STAN (in the case of 21.A.307(b)(4)) any specific verification activities to be conducted by the installer on the part or appliance before installing it on the product in accordance with Regulation (EU) No 1321/2014.

When assessing the safety effect of a part or appliance identified in point 21.A.307(b)(3) or (b)(4), the DAH or EASA should assume that the installer would conduct, in accordance with Regulation (EU) No 1321/2014, any specific verification activities on the part or appliance or release documentation, as identified in the ICA or in CS-STAN.

Example: Information from the DAH contained in the ICA: 'Part XXX-YY must comply with flammability requirement JJJ-KKK'. [...]"

comment

19

comment by: Ahmet Furkan IBRAHIMOGLU

Comment:

GM1 CAT.IDE.A.100(b) gives details about not required instruments and equipment which are carried on a flight. Eventhough it clearly states that such instruments and equipment do not need to be approved in accordance with Part-21, can such instruments & equipment be manufactured and installed by using the derogation given in 21.A.307(b)(3)-(6) ?

response

Noted.

Thank you for your comment. It is understood that the comment does not propose changes to the CM, it rather asks for explanation.

CAT.IDE.A.100(b) addresses equipment that is not required by the OPS rules. The point (a) of GM1 CAT.IDE.A.100(b) further clarifies that, installed equipment meeting CAT.IDE.A.100(b), the equipment itself and their installation have to comply with commission regulation (EU) No 748/2012.

EASA wish to clarify that for such equipment (and their installation) the derogation in points 21.A.307 (b)(3) can be used, but still an assessment should be made by the DAH that the effect of non-conformity has negligible effect on safety.

comment

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comment by: FOCA (Switzerland)

Dear Sir or Madam,
FOCA supports the proposed document and has no comments.
Thank you for taking note.

response

Noted.

comment

22

comment by: *Ahmet Furkan IBRAHIMOGLU*

Comment:

Can the derogation for large aeroplanes be used for IFE system and it's components?

response

Noted.

Thank you for your comment. It is understood that the comment does not propose changes to the CM, it rather asks for explanation.

It is not clear which derogation is referred to in the comment. Assuming that the comment refers to the derogation in point 21.A.307 (b)(3), the response is that such derogation can be used if the design approval holder decides to make use of the derogation and performs the required assessment and define parts of the IFE, which do not require an EASA Form 1, in the ICA. For those parts the installer will not need a Form 1. EASA cannot answer to the question for IFE equipment in general, since it depends on the design.

comment

23

comment by: *KSAK - Swedish Royal Aero Club*

We at the Royal Swedish Aero Club appreciate that EASA are working actively to allow the use of parts without Form 1 in aircraft.

What we demand from EASA now is the following:

- Return to the old rule before 18th of May of this year. The latest amendment has more or less made this rule worthless in our country, at least according to our maintenance facilities which do the installations.
- Raise the weight limit from ELA 2 aircraft up to 2730 kg to further align this with Part-ML and other alleviations associated with 2730 kg.

response

Not accepted.

Thank you for your comment.

EASA acknowledge that both proposals, regarding the expected use of the derogation in Sweden and regarding the increase of the weight limit from ELA 2 aircraft up to 2730 kg, are beyond the scope of this Certification memorandum, since they refer to the changes to point

21.A.307 introduced with Commission Regulation (EU) 2021/699 and the related AMC and GM. Justified proposals requesting regulatory action should be communicated to the Agency by the representatives nominated to the EASA Advisory Bodies using the appropriate channels.

comment

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comment by: UK CAA

Page No: 4 & 6

Paragraph No: 2 Background, 2nd sub-paragraph and 3.1, sub-paragraph 7) Point 21.A.307(c)

Comment:

Paragraph 2 states: ‘... For such parts, manufacturing in accordance with the approved design data needs still to be declared ...’.

Paragraph 3.1 states: ‘The intent of this requirement is to clarify that also for parts listed in point 21.A.307(b), a document declaring conformity to the design shall be provided. This document needs not be in the format of a Certificate of Conformity.’

The UK CAA believes EASA should define a standard wording that needs to be stated on the Certificate of Conformity for it to be considered valid to meet 307.

The UK CAA also considers a shipping note is not satisfactory for a certification document, so a Certificate of Conformity should be required for Standard Parts as well.

Justification: Appropriate documentation

Proposed Text:

‘The intent of this requirement is to clarify that also for parts listed in point 21.A.307(b), a document declaring conformity to the design shall be provided. ~~This document needs not be in the format of a Certificate of Conformity.~~ **A document issued by an OEM or commercial certificate of conformity issued under an accredited quality system such as ISO 9001 or EN 9100 accepted by the design approval holder are examples of an acceptable format. This should be defined in the DAH procedures and plan for each item.**’

response

Not Accepted.

Thank you for your comment. EASA does not agree to the comment since the provision 21.A.307(b)(3) addresses parts for which a non-conformity would have a negligible safety effect, EASA has taken the lightest requirement to fulfil the intended purpose which is traceability to the original manufacturer: this aims for the possibility that the installer is able to reach them in case of need and to report to the manufacturer, for instance, a repetitive manufacturing non-conformity on a given batch. This is also considering that these parts

may be manufactured by non-aviation companies over which the design approval holder has in practice no effective influence.

comment 37

comment by: *European Sailplane Manufacturers*

Comments to Proposed CM-21.A-K-001 Issue 02 "Parts without Form1"

on behalf of the European sailplane manufacturers, we send herewith the following comments:

1. Background information no.1 – Parts without Form 1 in sailplanes

Historical we see rather often the issue that parts have been fitted to sailplanes not having a Form 1.

The vast majorities of such cases are those, where additional equipment, often for dedicated use in sailplanes is added, sometimes even during the production of new sailplanes.

This had been brought to the attention of the Agency in 2005 and resulted into DECISION No 2006/13/R which brought the wording of today's AMC 21.A.303(c) Standard Parts into the Part-21.

For such a "sailplane standard part" it is required that

"...when installed, functioning, functioning improperly or not functioning at all, does not in itself, or by its effect upon the sailplane and its operation, constitute a safety hazard."

Accordingly such parts have been installed since 2006 and the CS-STAN includes regarding wording about the correct way to perform and document the according installation.

Background information no.2 – Parts without Form 1 in ELA 1/2 aircraft

Also in 2006 EASA acknowledged that several regulations including that for Part-21 should be amended to include alleviations for small aircraft.

This resulted into forming of the MDM.032 rulemaking task which went on for several years and created for example the well established ELA 1/2 definitions.

This was also in 2007 the occasion, where the wording for today's 21.A.307(b)(2) (owner accepted parts) was created and finally put into Part-21.

For such a "owner accepted part" in an ELA 1/2 aircraft it is required that

"...[it is not] not life limited, nor part of the primary structure, nor part of the flight controls."

Accordingly such parts have been installed since 2012 and in 2013 also CM – 21.A – K – 001 Issue 01 was issued.

Background information no.3 – Parts without Form 1 as defined by the DAH

Much later, but still based on the many discussions within the MDM.032 task and the following RMT.0018 and "Part-21 light" task led to NPA2019-19 which was rather different to the current wording of 21.A.307(b)(3) (DAH designated parts) which is today the outcome of this approach.

As discussed in the draft CM, here the requirement is that such parts must be of a kind “... for which the consequences of a non-conformity with its approved design data has a negligible safety effect on the product..”

4. Of course, the points 1. to 3. Are nothing new and are partially also detailed in the draft CM, but nevertheless it is interesting to compare those three:

case 1 – the owner, perhaps with help of a certifying staff decides that this part is “not hazardous”

case 2 – the owner sees that it is neither life limited / primary structure nor flight controls

Note: in both cases no need for justification and an easy process....

case 3 – as described in the draft CM the DAH has to show compliance and to justify that the effect is negligible with justification, documentation and also within a change which has to go through an EASA application / certification / fees & charges cycle.

Our main feedback is: this is certainly not proportional!

Of all stakeholders the DAH is certainly the most qualified to decide that the effects of having the same part (just now without a Form 1) is safe to operate, but he must show compliance!

Of all stakeholders the DAH would be the first to experience any negative consequences, but he has the most effort to use according procedures within Part-21!

And of all stakeholders it would be the DAH who has the least financial benefit from not requiring a Form 1 but he is required to apply for a change and pay with effort and a certification fee!

5. For these reasons the sailplane manufacturers would like to see some adaption in the proposed CM to make this application of 21.A.307(b)(3) (DAH designated parts) easier.

6. One way would be to take on board wording into the CM which is used for the other options described under 1. and 2. – example wording to explain this way:

“The DAH may comply with 21.A.307(b)(3) and (b)(4) with regard to the Meaning of ‘negligible safety effect’ by

(i) showing that the part is not life limited, nor part of the primary structure, nor part of the flight controls for installation in an ELA 1/2 aircraft, or

(ii) showing that the part when installed, functioning, functioning improperly or not functioning at all, does not in itself, or by its effect upon the sailplane and its operation, constitute a safety hazard for installation in a sailplane, or

(iii) show compliance with the Meaning of ‘negligible safety effect’ by adhering to the following processes [and then the explanations as in the draft CM].”

Justification: here, the DAH has not any more obligations than the stakeholders allowed to take options 1. or 2. If the CM would recommend additionally (but not require it) to do these other showing of compliance, this would be acceptable.

7. Another way would be to update the GM1 21.A.307(b)(3) and (b)(4) Meaning of ‘negligible safety effect’ and not do this in the CM.

8. In all cases it should not be subject of a required change process for the DAH to designate parts, which are not necessarily requiring a Form 1 or at least such processes need an exemption within the EASA fees & charges regulation.

9. Additionally, we received feedback that beside the things addressed in the CM there is some uncertainty in the implementation of options 1. or 2. regarding continuing airworthiness. Some NAA seem to apply much stricter processes with regard of the obligation of a repair / maintenance organisation to issue Form 1. In some cases, taking the possibility to ask the owner to use the process as described in 21.A.307(b)(2) is then used as a work-around. Here again a more streamlined process by using a DAH designation for such a part could be a much better option, but the process as described in the draft CM is much too onerous for such cases.

All in all the manufacturers applaud the update of CM-21.A-K-001 into Issue 02 "Parts without Form1" but would appreciate very much less onerous processes for the DAH.

10. Last but not least we received feedback that the new wording and structure in 21.A.307 also brought some (possibly unintended) changes for the installation of "standard parts" according to AMC 21.A.303(c) Standard Parts bullet 1 & 2.

In the new wording of Part-21 also such a standard part would require a kind of CofC according to 21.A.307 (c) and feedback from experience shows that this may be difficult or impossible to get in typical cases. (Case A: buying standard nuts and screws in an end-customer shop or Case B: buying a sailplane standard part like a bug-wiper which are often sold by a cottage type of manufacturer or are obtained second-hand.) This is a complication which should be rectified by either amending the AMC/GM for 21.A.307 or could be also addressed in the planned new CM.

response

Not accepted

Thank you for your detailed comments and proposal.

First EASA wish to clarify that the already existing derogations for standard parts (and the related meaning for sailplanes as per AMC 21.A.303(c)) and owner accepted parts are still available with no change to their meaning and scope (ref. derogations in points 21.A.307 (b)(1) and 21.A.307 (b)(2) respectively). The new derogations in 21.A.307 (b)(3) and 21.A.307 (b)(4) are not affecting the above mentioned derogations.

EASA understand that the comment aims also to provide an alternative to the meaning of negligible effect (for ELA1/2 aircraft) as provided in GM1 21.A.307(b)(3) and (b)(4). EASA find that the proposal goes against GM1 and it is therefore beyond the scope of this CM. EASA wish to provide nevertheless some clarifications in the following response.

The Design Approval Holders can define parts eligible for the derogation in Part 21.A.307 (b) according to any subparagraph. Which means that the DAH can define Standard parts according to point (b)(1) (for which the provision of AMC 21.A.303(c), point 2, can be used

when applicable), and then, for the rest of the parts, derogation in points (b)(2), (b)(3) or (b)(4) can be used.

In this context, a clarification will be anyway added to the CM par. 3.2, concerning Sailplanes standard parts, to make clear reference to provision of AMC 21.A.303(c), point 2.

For what concern the effort of the DAHs, EASA wish to clarify that a change approval, in order to identify parts that do not require form 1, is not required since ICA can also be changed in accordance with 21.A.90C. Similarly, it is not expected that a new certification effort is required to perform the related assessment, since it is largely based on certification information already available (as explained in section 3.4.2 of the CM).

Finally, concerning the conformity requirements (last point in the comment), the CM already provides information on how the conformity can be checked for Standard Parts, without the need of a CofC. See also the comment 24, 33, 35 and the information in section 3.5 of the CM.

comment 42

comment by: *Slovenian CAA*

I have a comment to the proposed CM-21.A-K-001 Issue 02 regarding definition of the design data that a part or appliance without an EASA Form 1 and declared to be installed in the ELA1 or ELA2 aircraft by the owner shall conform to.

I am in process to issue an exemption in accordance to article 71(1) of basic regulation and have encountered in a practical problem where I was asked what it is actually meant by the new definition »part or appliance to be in conformity to its design data« new 21.A.307(c) as in oppose to the old requirement »manufactured in conformity to applicable design« old 21.A.307(c)(2),

I noticed that the CM-21.A-K-001 Issue 01 does clarify the design data to which such part or appliance shall conform to. It is applicable design data and the definition of those is defined in the GM No 2 to 21.A.121 Applicability – Applicable design data and GM 21.A.131 Scope – Applicable design data, “Applicable design data is defined as all the necessary drawings, specifications and other technical information provided by the applicant for, or holder of a...”

The proposed CM-21.A-K-001 Issue 02 in principle continues the same narrative despite that the requirement is really not the same. “its design data” in relation to “applicable design” is by my understanding essential difference especially due to missing definition of the term “its design data”. That may mean really anything including translation by some frustrated owners of old types of small aeroplanes not able to procure eligible parts for their aircraft, that “its design data” mean that a part or appliance just have any design data to define the part or appliance. So in ch. 2 second paragraph of the proposed CM-21.A-K-001 Issue 02 it’s the text stating »Points 21.A.307(b)(1)(2)(3)(4)(5)(6) of Commission Regulation (EU) No 748/2012, as introduced by Commission Regulation (EU) 2021/699 of 21 December 2020, provide

derogations to point 21.A.307(a) for the installation of parts and appliances without an EASA Form 1 (to make the process more proportional when it comes to the installation of parts and appliances with a low safety risk). For such parts, manufacturing in accordance with the approved design data needs still to be declared but without the need of an EASA Form 1 (see 21.A.307(c)).« I find this text a bit misleading and in very weak correlation to the regulation. So my suggestion is to put in CM-21.A-K-001 Issue 02 clear definition (explanation) that the term “its design data” stands actually for “approved design data” because the introduction of any other design data in to an approved design would mean the implementation of an unapproved change to the type design. The only reason that the term “its design data” is used for the purpose of acquiring parts from non-aviation OEM-s (vendors), which some are not even aware that the particular part they produce is included in an approved aviation product and that type certificate holders are the owners of the approved design data, which include also OEM-s “of the shelf” component.

The other interesting explanation in the CM-21.A-K-001 in both Issue 02 and Issue 01 is about parts and appliances manufactured by OEM non-aviation vendor: »There are two ways to establish that a part without an EASA Form 1 conforms with applicable design data:

- by obtaining a part directly from the original source/Original Equipment Manufacturer (OEM) (which may be a non-aviation vendor) as identified by part number and/or vendor code in the ICA (e.g. IPC, SB, AMM etc.).«

I think that the repetition of this text in the CM-21.A-K-001 Issue 02 does not entirely match the requirement of new 21.A.307(c): “.....provided that the installer holds a document issued by the person or organisation that manufactured the part or appliance, which declares the name of the part or appliance, the part number, and the conformity of the part or appliance with its design data, and which contains the issuance date.”

So I believe the text should contain also the need for “a document issued by the person or organisation that manufactured the part or appliance, which declares the name of the part or appliance, the part number, and the conformity of the part or appliance with its design data, and which contains the issuance date”, something like:

“- by obtaining a part directly from the original source/Original Equipment Manufacturer (OEM) (which may be a non-aviation vendor) as identified by part number and/or vendor code in the ICA (e.g. IPC, SB, AMM etc.), provided that the part is equipped with the document issued by the OEM, which declares the name of the part or appliance, the part number, and the conformity of the part or appliance with its design data, and which contains the issuance date.»

Of course it would be next to impossible to obtain such document from the OEM (except if it is foreseen that “EU declaration of conformity” is the one meant in the new 21.A.307(c)).

It would be most helpful for future practical use of this provision if such clarifications of terms used in the regulation are provided in the CM-21.A-K-001 Issue 02.

So I believe the new regulation is even more restrictive (less flexible) than the old one in case of parts declared by the owner of the ELA aircraft and even standard parts.

response

Not Accepted.

Thank you for your comments.

In response to your first comment, please note that the term 'its design data' as opposed to 'approved data' is used in 21.A.307(c) since in the case of 21.A.307(b)(4) the design data that contains reference to the part design is not approved.

EASA do not agree with the assumption that by using the term 'design data' a person could argue that it is permitted to install parts that are not referred by a design compliant with the design provisions of Part-21.

In response to your second comment, please refer to the replies provided to comments 24, 33 and 35.

Log of issues

p. 2

comment 1

comment by: *KNVVL Royal Netherlands Aviation Organisation*

Het meest passende commentaar richting EASA is dat de tekst totaal onbruikbaar is in het veld. Het betreft complex juridisch Engels met verwijzingen naar tenminste drie andere delen van complexe regelgeving. Dit is totaal onbegrijpelijk, tenzij je het als jurist bij EASA zelf bedacht hebt.

The most appropriate comment I can think off towards EASA, is that the document and text is utterly unusable in the field. The phrasing consist of complex, difficult to read English. The text relates to at least three variants of other regulations besides Part 21 such as: 1321/2014 Part ML.A.502, ML.A.201, CS-STAN, AC4313, Part 66.A.20. Part CAO, 145. So while rading and trying to understand you get the run around along more unintelligeable EASA text.

No indivual owner, AML or even the average CAO, or 145 will be able to understand and properly apply this.

The only person probably understanding what it is all about is lawyer who prepared this nonsense on behav of EASA.

Job well done EASA.....

response Noted.

Thank you for your comment, EASA recognises that it is challenging to navigate through different regulations. EASA has performed a further review of the text and has introduced some improvements aiming for clarity.

Nevertheless, in EASA view, the references to other applicable regulations that need to be taken into consideration for a proper application of the concept of 'Parts without an EASA Form 1' helps to understand the applicable legal framework.

1.1. Purpose and scope

p. 3

comment 26

comment by: *Uppsala Flying Club*

The document is generally helpful but is essentially silent regarding the new 21.A.307(c). See comments on section 3.5.

response Noted.

Thank you for your comment.

Reference is made in comment 27, to which a response is provided.

1. Introduction

p. 3

comment 28

comment by: *IATA*

- General
 - Issue: it is a CM and by definition it is a customary tool used by DAH; while “3.8 Who this CM affects” mentions also the “installers”, do they usually have the awareness of CMs or there is also an additional means which could point them towards this CM?

response Noted.

Thank you for your comment.

EASA consider referring to this Certification Memo in any related continuing airworthiness FAQ.

3. Certification Policy

p. 4

comment 3

comment by: *THE ROYAL EXPRESS TRAVELS*

response

No comment.

3.1. Structure and additional explanations of the new regulation and of the related AMC/GM;

p. 5

comment

21

comment by: *General Aviation Manufacturers Association (GAMA)*

RATIONALE

Item 5) Point 21.A.307(b)(5) has been introduced and states the following:

"(5) a part or appliance that is exempted from an airworthiness approval in accordance with Commission Regulation (EU) No 965/2012 ();"*

1. It is not clear what "(*)" means in the context of this statement.

2. While it is appreciated that the intent of 21.A.307(b)(5) is to exempt from the need of an EASA Form 1 those parts for which operational rules ((EU) No 965/2012) do not require an airworthiness approval, it was not obvious from our review of (EU) No 965/2012 which parts would be considered exempt. For example, (EU) No 965/2012 includes four instances of "exempt" (not including the preamble) but these appear to be exemptions from requiring equipment to be installed at all and it is unclear whether 21.A.307(b)(5) would be applicable even if an operator chose to install equipment that is not required by (EU) No 965/2012.

PROPOSED ACTION/TEXT

1. Clarify what "(*)" means in the context of this statement.

2. Clarify the intent of 21.A.307(b)(5) as relates to at least one specific example from (EU) No 965/2012.

response

Partially accepted.

Thank you for your comment.

The (*) is an internal reference in regulation (EU) No 748/2012). EASA agree that the (*) it does not provide a reference in this certification memorandum so it will be removed.

Regarding the comment that it is not clear which parts are exempted from an airworthiness approval, GM1 21.A.307(b)(5) explains which are the points of Commission Regulation (EU) No 965/2012 that identify such parts.

comment

24

comment by: *KSAK - Swedish Royal Aero Club*

When the requirement for a "document issued by the person or organisation that manufactured the part or appliance" was introduced it absolutely ruined this good rule. It is now very difficult to install used parts that previously(before 18th of May) could be installed.

If you wish to move an instrument or any other part that fulfills the terms in 21.A.307(b)(2) to another similar aircraft, it is no longer possible unless you have an old Form 1 for that part. Mind you that basically no parts installed by the factory when the aircraft was built will come with a Form 1. This means that recycling of perfectly fine and used components is made impossible with the changes introduced earlier this year.

Therefore we demand that the rule is changed again to make installation of used parts possible again. As an example you will find a lot of perfectly fine parts in an aircraft that might have been written off due to various reasons. There are also plenty of second hand avionics available that we want to be able to install.

There is no greater hazard in installing more modern used avionics than keep using the old original one.

It is also better for the environment to take advantage of the second hand market when it comes to these parts that are not critical.

response

Not accepted.

Thank you for your comment. EASA do not agree to the comment.

It was never the intention that the referred process was meant to be for the installation of used parts, as it can be deduced by referring for the related rulemaking documents. For new parts EASA considers that the referred document from the manufacturer should not be difficult to obtain.

Continuing airworthiness rules permit that a properly approved maintenance organisation issues EASA Form 1 for parts removed serviceable from an aircraft.

To install new more modern parts to substitute a rather older design, a change to the approved design is also needed.

comment

29

comment by: IATA

- Section 3.1 7) (page 6 of 12):
 - Issue: the CM mentions that "...a document declaring conformity to the design shall be provided. This document needs not be in the format of a Certificate of Conformity"; should we link this to section 3.5 (page 10 of 12) elaborated explanation?
 - Solution: include additional text to say "...a document declaring conformity to the design shall be provided. This document needs not be in the format of a Certificate of Conformity – see details under section 3.5".

response

Accepted

Thank you for your comment.

A reference to section 3.5 will be provided.

3.3. Derogation referred to in point 21.A.307(b)(2) (owner accepted parts)

p. 6

comment

5

comment by: *THE ROYAL EXPRESS TRAVELS*

response

No comment.

comment

34

comment by: *UK CAA*

Page No: 7

Paragraph No: 3.3

Comment: The sub-paragraph beginning “*There are two ways to establish.....*”
The UK CAA believes this text is not only applicable to owner accepted parts and therefore we recommend that it should be moved to paragraph 3.5 ‘Conformity, marking, manufacturing aspects’.

response

Partially accepted

Thank you for your comment.

EASA agree that the text identified in the comment is of general validity. After further review EASA has assessed that paragraph 3.5 provides sufficient information regarding means to establish conformity, therefore the text highlighted in this comment will be replaced with a reference to paragraph 3.5.

comment

36

comment by: *M. M.*

The way EASA introduces the possibility to install owner accepted parts is highly appreciated by GA.

Beside this fact, it must be taken into account, that the owner may not have the necessary background to verify the compliance with the applicable condition. Therefore some kind of sample matrix or material to describe the procedure the verification of being compliant should be introduced.

Without this, owner, who are not familiar with the work of Part 21J or Part 21G do not understand the required steps.

As a sample, many aircraft operating Rotax engines uses spark plugs similar to those used at motorcycle engines. In fact those are nearly the same spark plugs. May it be acceptable for the owner to use such parts. From the financial point of view, yes, because those cost only the half of a certified spark plug. Using the certified spark plug is obvious of course.

The point is, EASA may should clearly make some samples or a sample matrix, what owners can expect to accept. This should be done similar to the table stated at ED Decision 2015/029/R AMC to Appendix VIII — Limited Pilot Owner Maintenance.

response

Not accepted.

Thank you for your comment. EASA do not agree to the comment since this CM does not concern using parts different from those belonging to the Type design (or other design change in accordance with Part-21). Parts to be installed must still belong to the approved design.

For certain aircraft, 21.A.90B and CS-STAN provide some other means to embody design changes that could refer to parts other than those from the original type design.

3.4.1. Who can use the derogation

p. 8

comment

6

comment by: *Julien Mourat*

Concerning the following texts :

"In this respect, the holder of an ETSO authorisation cannot assess the effect of a potential non-conformity of the article at product level and therefore the holder of an ETSO authorisation cannot determine that the article can benefit from the derogation referred to in point 21.A.307(b)(3)."

Here are the following remarks :

The ETSO authorisation holder should be allowed to submit a safety analysis to the EASA which would issue its opinion.

In case the safety demonstration provided by the ETSO holder proves sufficiently convincing for the EASA, the latter could authorize the ETSO holder to exempt it from such part or subassembly of the EASA Form1.

response

Not Accepted.

Thank you for your comment.

EASA do not agree to the comment. The installation and integration aspects of the article at product level cannot be assessed by the ETSO Authorisation holder. In addition, it is reminded that the ETSO Authorisation holder shall always have a Production Organisation Approval (POA) - see capability demonstration requirements in 21.A.602B. Consequently, the need to release the article or (spare) parts without a Form 1 is questionable.

comment

10

comment by: *Ahmet Furkan IBRAHIMOGLU*

Comment:

In second paragraph; can't we use this derogation (21.A.307(b)(3)-(6)) as a third party even if we sign an agreement/arrangement with related parties to receive & use the data?

Justification:

It would be clear if the text included the case where there is an agreement/arrangement in place between a third party and other related (design approval holder & manufacturer) parties.

response

Not Accepted.

Thank you for your comment.

According to Part 21, the derogation can be used only by design approval holder since they have sufficient knowledge to make an assessment of the consequence of the non-conformity. Consequently, the CM may not provide clarifications / guidance which are going beyond Part 21 requirements. In addition, it is to be noted that the design approval holder has to identify such parts (i.e. which do not require a Form 1) in the Instructions for Continued Airworthiness (ICA) and also in the installation instructions (see Section 3.4.3 of the CM). In this context, there is no need for an additional agreement / arrangement between the design approval holder and the installer (or any other party).

comment

11

comment by: *Ahmet Furkan IBRAHIMOGLU*

Comment:

In second paragraph;

"It is not acceptable that a third party uses the derogation since they are not the holder of the approval of that design (it is also highlighted that stand-alone changes to ICA as defined in 21.A.90C can be introduced only by the holder of the design approval for which those instructions have been established)."

Proposed text:

Please re-visit this paragraph for COTS equipment.

Justification:

This derogation (21.A.307(b)(3)-(6)) could be really useful for *some* COTS equipment. As far as i know, one of the reasons why this rule was even brought up was that there was a need for DOAs to use COTS equipment without the need for Form 1. However, from what I understand from this paragraph, it is not possible to use this derogation for COTS equipment if the COTS equipment manufacturer is the designer.

response

Not accepted.

Thank you for your comment.

EASA do not agree to the comment. It is fully acknowledged that in most of the cases the COTS manufacturer is the COTS designer. EASA confirm that a derogation can be used to allow the installation of the COTS without a Form 1 but still the installation itself has to be approved and the design approval holder have to ensure compliance with the conditions in 21.A.307 (b) if the COTS is to be exempted from the Form1. In other words, an installer cannot take a COTS and install it if there is no design approval for such installation.

3.4.2. Meaning of "negligible effect"

p. 8

comment

12

comment by: *Ahmet Furkan IBRAHIMOGLU*

Comment:

Second the last paragraph of page 8 states that:

"

The 'negligible safety effect' assessment may depend, among other factors, on the location of the part in the aircraft. The same part could be contained in systems with different

criticality and its non conformity may have an effect on safety when installed in a particular system and may have a negligible safety effect when installed in another system.

"

Doesn't this approach follow a different line of thinking in comparison to Section 6.b. of FAA AC 21-45?

Justification:

This may cause disharmonization.

response

Not accepted.

Thank you for your comment.

EASA do not agree to the comment. The scope of the FAA AC 21-45 is limited to 'commercial part'. The approach in EASA Part 21 (21.A.307(b)(3)-(6)) is not attempting to define and limit the derogation to 'commercial part' similar to FAA AC. Even if a part will not be meeting the definition for 'commercial part' in FAA AC 21-45, it may still be found eligible for installation without an EASA Form 1 according to e.g. 21.A.307(b)(3). Consequently, the clarification contained in the quoted paragraph is fully relevant.

Even if EASA requirement is not limited to 'commercial parts', in both FAA AC and EASA CM, there is consideration of a potential product design that incorporates such part in two different locations with a different safety effect in the case of a 'non-conformity' (FAA AC uses the term 'failure') of the part. Also, both documents require means to prevent that such part would be installed without evidence of manufacturing controls (e.g. EASA Form 1) if the safety effect of a potential non-conformity of such part in a system would not be negligible.

3.4. Derogation referred to in point 21.A.307(b)(3)

p. 8

3.4.4. Specific verification activities to be conducted by the installer

p. 9

comment

4

comment by: *THE ROYAL EXPRESS TRAVELS*

response

No comment.

comment

13

comment by: Ahmet Furkan IBRAHIMOGLU

Comment:

"In principle and unless decided otherwise by the aircraft POA holder, when an aircraft TCH elects to use the provisions set up in point 21.A.307(b)(3), such parts do not need to be accompanied with an EASA Form 1 neither during the first installation before aircraft release"

Shouldn't this be the responsibility of DOA since DOA decides which part(s) can be eligible for the derogation in 21.A.307(b)(3)-(6) ?

Justification:

The decision should be made by DOA rather than POA since the eligibility assessment is done by DOA.

response

Accepted.

Thank you for your comment.

EASA acknowledge that the text is misleading therefore the subparagraph has been changed as follows, adding also more details for sake of clarity:

~~"Regulation (EU) 2021/699 has no effect on the way an aircraft POA holder controls the conformity of parts supplied by other organisations. In principle and unless decided otherwise by the aircraft POA holder, when an aircraft TCH elects to use the provisions set up in point 21.A.307(b)(3), such parts do not need to be accompanied with an EASA Form 1 neither during the first installation before aircraft release."~~

"Regulation (EU) 2021/699 is not intended to change the way an aircraft POA holder controls the conformity of parts supplied by other organisations. When an aircraft TCH elects to use the provisions set up in point 21.A.307(b)(3), such parts do not need to be accompanied with an EASA Form 1 neither during the first installation in a new aircraft (the aircraft POA holder has always to establish procedures acceptable to its Competent Authority for the acceptance of parts coming from external parties), nor when a new part is delivered to a maintenance organisation for installation as a spare part (as 21.A.307(b)(3) applies to such part in this case). Note: when the conditions set up in 21.A.307(b) are met, an EASA Form 1 is not required. However, it is not forbidden to issue an EASA Form 1 in this case, provided the production organisation complies with Part 21 requirements (in particular, the production organisation should be granted with the appropriate scope and should ensure the proper coordination with the design approval holder)."

Commission regulation (EU) 2021/699 introduced a new requirement for conformity documents, 21.A.307(c). In the context of owner-accepted parts – 21.A.307(b)(2) – this requirement has proved very troublesome. Among other things, the requirement that the conformity document is issued by the manufacturer sets the bar higher compared to the Form 1 which can also be issued by some maintenance organisations.

Several maintenance organisations that have in the past installed owner-accepted parts without a Form 1 claim that it is now impossible to do so because a conformity document such as required by 21.A.307(c) is *in practise* impossible to obtain. Hopefully, this is a misinterpretation of 21.A.307(c) and in that case it is imperative that EASA clarifies – in a way that is not open to interpretation – exactly how 21.A.307(c) is intended to be applied and what kinds of documents are acceptable.

21.A.307(c) does not mention that the conformity document has to include a serial number or otherwise identify the individual part. This is reasonable as every part with a specific part number should equally conform to the design. This, however needs to be stated explicitly in the Certification Memorandum.

The Certification Memorandum also needs to state clearly what kinds of documents are acceptable to show conformance. After reading it, it should be possible to know the answer to at least the following questions:

- Is an installation or maintenance manual for the part issued by the manufacturer sufficient? What information on certifications, approvals etc. does it need to contain?
- Is it sufficient that a type certificate holder lists the part with its part number in a maintenance manual or parts catalogue?
- Is it sufficient that the part with its part number is mentioned in an STC or Minor Modification document?
- Is a document such as an FAA 8130-3 sufficient? (I know that in the particular case of the 8130-3, EASA accepts it in lieu of a Form 1 for *new* parts, but in principle?)
- Is an original Form 1 issued when the part was new acceptable as a conformity document even if the part has since been repaired, overhauled, removed from an aircraft and put in storage, etc. without a new Form 1 having been issued?

I will give some examples of installations of owner accepted parts in accordance with 21.A.307(b)(2), all of which were possible under the old formulation of 21.A.307 but which is now deemed impossible in practise by the installers I have talked to. Assume that all other requirements on the use of 21.A.307(b)(2) are met.

1. A part (e.g. an instrument, avionics unit, wheel fairing, light unit etc.) is removed from an aircraft for repair or overhaul. The facility performing the repair or overhaul does not issue an EASA Form 1. The same part is reinstalled in the aircraft.

2. A part (e.g. an instrument, avionics unit, wheel fairing, light unit etc.) is removed from an aircraft and a different *used* serviceable component with the identical part number but no EASA Form 1 is installed instead.
3. A part (e.g. an instrument, avionics unit, wheel fairing, light unit etc.) is installed in an aircraft according to an STC, Minor Modification or Standard Change. The part is used and has no EASA Form 1 but is serviceable and the identity of the component is not in question, e.g. by manufacturer markings.

I would like EASA to comment on how the requirement of 21.A.307(c) should *practically* be met in such cases – or state that it is on purpose that such cases should be ruled out.

response

Not accepted.

Thank you for your comment. EASA do not agree to the comment, the current provision 21.A.307(b)(2) (former 21.A.307(c)) was never meant as permitting the installation of used parts, as it can be deduced by referring for the related rulemaking documents. For new parts EASA considers that the referred document from the manufacturer should not be difficult to achieve. For the installation of used parts, the continuing airworthiness regulation allows for the issue of EASA Form 1 removed serviceable from an aircraft.

comment

35

comment by: UK CAA

Page No: 10

Paragraph No: 3.5

Comment: This paragraph mentions standard parts and dated delivery note, stating the name and part number. The intent here is not clear; and it is questioned whether it is inferring that a delivery note can also be used in lieu of an EASA Form 1 for parts with negligible safety effect

The UK CAA considers that a delivery note is not a document that declares conformity to the design data.

Justification: Clarity required.

response

Partially Accepted.

Thank you for your comment.

EASA deem that by quoting the part name and number on the delivery note, the manufacturer declares that the shipped part is actually what it is referred on the delivery note, therefore the requirement 21.A.307(c) can be considered as fulfilled.

Paragraph 3.5 is reworded to provide clarity.

The sentence:

“In respect of ‘standard parts’, this requirement is fulfilled with a ‘dated delivery-note’ from the manufacturer stating the name and the part-number’.”

is replaced with the following:

“In respect of parts referred in 21.A.307 (b), this requirement is fulfilled with a ‘dated delivery-note’ from the manufacturer stating the name and the part-number.”

3.6. Impact on International Agreements

p. 11

comment 30

comment by: IATA

- Section 3.6 (page 11 of 12)
 - Issue: given the international sourcing of aviation parts, it would be very important to speed-up the BASA TIP relaxation when both BASA partners do have similar relaxations in place
 - Question: could the Agency advise about the status in that respect of the EU-FAA BASA amendment of TIP to take advantage of the 21.A.307(b)(3)/(4) and AC 21-45 commonalities?

response

Noted.

Thank you for your comment.

Adaptation of the EASA/FAA TIP wording to take advantage of the 21.A.307(b)(3)/(4) and AC 21-45 commonalities is part of the discussions between EASA and FAA for a future TIP update.

comment 31

comment by:

- Section 3.6 (page 11 of 12)
 - Issue: is the last paragraph of section 3.6 intended to address, for EU-approved designs, only the use within EU of parts manufactured outside EU without the need of a Form1? Would the paragraph apply to an aircraft registered under a SoR which (State) accepts directly (without further validation process) the EU-approved design?
 - Question: please clarify in addition of the first paragraph of 3.6 (i.e. clarify for States which EASA does not have a BASA with).

response

Partially Accepted.

Thank you for your comment.

For installation on EU-registered aircraft, the acceptance of parts fulfilling the conditions set up in 21.A.307(b)(3) and (c) without authorised release certificate is possible from every country, except those for which a BASA is established. Indeed, a BASA takes precedence over EASA Part 21 and currently, all foresee the need for an authorised release certificate in order to export the parts into the EU or into the BASA country (some exceptions apply, but not yet linked to this provision). This will be true until the respective TIPs are updated to include such a relaxation.

For installation on non-EU registered aircraft, this shall be discussed with the SoR authority.

EASA recognise that paragraph 3.6 can be improved clarifying this aspect and will modify the text accordingly.

Appendix A - Example for the assessment of the consequences of the non conformity

p. 12

comment

2

comment by: www.aptoz.is

Appendix A should be updated with other samples other than ELA1 and ELA2 parts and also to include parts envisioned commonly for CS-23, CS-25 etc.

Such parts may be:

1. Simple brackets
2. Placards
3. Foils used for exterior marking of aircraft
4. Ownership nameplates on engines, aircraft
5. Aircraft identification steel plates

Better yet the GM should include a list of parts considered safe by EASA to install without a Form 1 and hence no safety assessment needs to be done by DOA holder.

response

Not accepted.

Thank you for your comment.

EASA do not agree to the comment for the following reasons:

The aim of the table is not to provide examples of parts for which the derogation can be used. As stated in footnote 4, "The table is an example on how the results of the assessment

can be collected. It has been prepared for ELA1/2 a/c but it can be extended by similarity to other aircraft".

Furthermore, providing a list of parts considered safe by EASA, would not meet point 21.a.307(b)(3), since the derogation can be proposed only by the design approval holder.

comment 32

comment by: IATA

- Appendix A (page 12 Of 12)
 - Issue: the title is talking about "...assessment of the consequences of the non conformity" and only the foot note 4 is recognizing that the table was developed for ELA 1 and ELA 2 aircraft – as mentioned in the opening text of column one of the table. This is a bit of inconsistency from the Agency side: it provides what EASA calls a general example, which in fact is limited to a particular example (i.e. ELA 1/2) although EASA claims it can be extended ("by similarity"!) by the reader to become a general example ... if the reader would consider the expectations as detailed in 3.4.2 that "similarity" is a very complex process expected from the DAH under use of 21.A.307(b)(3) and (b)(4)
 - Solution – either preserve the Appendix 4 title and remove ELA1 and ELA 2 wording from column one of the table and the second part of foot note 4, or change the Appendix 4 title to "Example for the assessment of the consequences of the non conformity for ELA1 and ELA2" and remove the second part of foot note 4; the first solution option would be preferable given the reference to this appendix (i.e. see text in 3.4.2 stating "In appendix A an example of table that collects the results of the assessment is provided") although not sure if possible given expectation presented in first part of 3.4.2


response Partially Accepted.

Thank you for your comment.

The aim of the table is to provide an example of how the results of the assessment can be collected. The reference in the first Column to ELA1 and ELA2 is due to the fact that the criteria listed in that column are those identified for such aircraft in GM1 21.A.307(b)(3) and (b)(4). The table is an example also for non ELA1/ELA2 a/c, as long as the related criteria in the above GM are used.

EASA will add to the appendix another table for non ELA1/ELA2 aircraft and remove footnote 4.

Appendix A - Attachments

 [EASA - AM WG1.jaileplpg](#)
Attachment #1 to comment [#17](#)