



## European Union Aviation Safety Agency

### Comment Response Document (CRD) to Equivalent Safety Finding ref.

ESF-D25.856-01 Issue 1 on

“Flame penetration resistance in the lower half of the fuselage”

(24 October 2023)

#### 1. Summary of the outcome of the consultation

During the public consultation of the above referenced proposed Equivalent Safety Finding from 14 September to 5 October 2023, EASA has received:

- 1 comment
- from 1 commenter.

#### 2. 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** — it means that EASA agrees with the comment and any proposed change is incorporated into the text
- (b) **Partially accepted** — it means that 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 and the text will not be changed

comment 1

comment by: DE-LBA

We understand that this ESF is raised to address local replacement of existing thermal/ acoustic insulation material.

Our understanding of CS 25.856 is, that it applies only if thermal /acoustic insulation material is installed, but it does not impose a mandatory requirement for installation of such material at all.

If installation is not mandatory, removal or replacement of existing material should not be precluded by this requirement.

Therefore, from legal perspective we do not see the necessity for an ESF against 25.856. In general, fuselage flame penetration resistance is obviously not covered as an independent requirement by existing CS 25.

If it is intended to impose such a requirement, it would be more a subject for a Special Condition and not an ESF.

response

Not accepted

The purpose of this ESF is not to mandate any burn through compliant material in areas where it would not be mandated.

The purpose of this ESF is to authorize the usage of other materials in the lower half of the fuselage, instead of insulation blankets, to provide a burn through protection.