

### Purpose of the meeting

- Purpose of the meeting is to update on actions taken on CDCCL and maintenance issue.
- Discussion of outstanding issues is scheduled after an EASA presentation
- Discussion will be followed by a summaryconclusions.



### European Aviation Safety Agency Review of conclusions from June 2004 workshop

#### $\boldsymbol{\div}$ Instructions for continued airworthiness:

- + CDDCCL will only be notified by AD if TC/STC holders do not produce them in time. AD schedules for Operators will provide same delay as Part-M:
  - Status: See slide 9
- Plan for ICA maintained as described in the slides.
  Status: See slide 12
- EASA has noted concerns expressed by Operators
   Therefore EASA is willing to organise with representatives of Industry and NAAs to evaluate if changes are needed when better knowledge of work generated by CDCCL volume
  - Status: Today's workshop and see also slide 12



### European Aviation Safety Agency Review of conclusions from June 2004 workshop

#### → Instructions for Continued Airworthiness:

 EASA will write to Authorities to make clear that the dates included into the JAA Interim Policy are replaced by those described in these slides

# Status: letter to TC/STC holders posted on EASA web-site

- + EASA will publish on its Web-site the letter to TC/STC holders if no confidential data
  - Status: done
- + PMA on CDCCL for European products will only be accepted after the modification has been approved by EASA

Status: no change



### European Aviation Safety Agency Review of conclusions from June 2004 workshop

#### Communications channels:

\*Keep the communication channels open:

- This is likely to take the form of another information meeting with a wider audience including national Authorities after summer.
   Status: today's workshop
- +AEA offered a Fuel tank Safety focal points for discussions with EASA:
  - Status: offer is acknowledged with thanks. Such focal point would find its natural place in the rulemaking group for task 25.056 (Inerting/ Fuel Tank safety).

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### **Rulemaking framework for FTS**

- The rulemaking framework for such issues is somewhat complex because they need to address generally speaking the following items:
- Amendment to certification specifications to improve the standards for fuel tank systems. This will address the case of future TC and future amendments to TC/ future STC in accordance to the changed product rule.
- Requirement to Design Approval Holders (e.g. TC, STC holders) to review their existing design to identify compliance with the amended certification specification
- $\boldsymbol{\div}$  Requirements for operators to introduce resulting modifications in individual aircraft and maintenance programme

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 $\boldsymbol{\div}$  Requirement to install certain systems in aircraft in production and possibly in aircraft in service



### 3 subjects today

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- Part 1 developments after 24 June 2006 until present, ALI, CDCCL including harmonisation activities
- Part 2 letter to JAA NAAs, a consequence for operators of the JAA Recommendation letter on Fuel Tank Safety and SFAR88
- →Part 3 Proposed EASA ADs, Final EASA ADs, FAA ADs



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PART 1 – after 24 June 2005

+ Chronology of actions after 24th June 2005



### After 24 June 2005

- → EASA published presentations and Questions & Answers following the 24 June meeting on the EASA website July/August 2005. RIA for FRS followed later in the year
- → EASA published Policy Statement on the process for development of MRBR, including compliance schemes for CDCCL and ALI in August 2005, requesting EU and non – EU TC holders to accept EASA dates (31-12-2005 for unsafe related and 31-12-2006 for not unsafe related)
- In principle, most of the TC Holders could meet the EASA targets: 2 TC Holders had a delayed response
- EASA changed approach with regard to Part M.A. 302 discussion and decided to issue ADs per type of aircraft: communicated to AEA and AAPA

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# After 24 June 2005

- → Detailed discussion started August, September and October with all EU TC holders
- → 3 August Airbus meeting, 5-6 October all other EU TC holders, 4 November Fuel Tank Safety closing meeting for MRBR with Airbus
- → 12 October 2005 EASA fuel systems specialist seminar
- 15 November most EU TC Holders issued their Fuel Airworthiness Limitations for approval to EASA
- → 1-2 December 2006: FAA-EASA-TCCA-CTA meeting was held for coordination

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# After 25 June 2005

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- → 8 December 2005 EASA Fuel Tank Safety Airworthiness Limitations standardisation review was held: useful exercise for overview: report internal EASA
- December 05 Jan 06: Communication with EU TC holders about the changes needed to approve the Fuel Airworthiness Limitations and associated detailed information needed for publication
- → January 2005: EASA proposed ADs for all EU TC holders types of aircraft for Fuel Tank Safety



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# After 24 June 2005

- Comments are being received to finalise the EASA ADs: 2<sup>nd</sup> half of February 2006 and March 2006 we hope to release the final ADs
- Proposed ADs: substantial comments received: grace period, time for release of detailed CDCCL associated documentation, text and legal consequences
- → Questions from operators to some EU TC holders: are some TC holders `not in compliance with EASA policy' since 31-12-2005 has passed and relevant document have not been published?
  - EASA decision to revise the EASA policy statement, addressing revised dates, cover ALI and CDCCL aspects (revised date propose 1 April 2006)



Some words on FAA – EASA – TCCA and CTA meeting 1 and 2 December 2005

Text for CDCCL in Component Maintenance Manuals – standard text

- Exceptional short term extension for Fuel ALI's: differences will remain to exist between EASA, FAA and TCCA. EU TC holders documents contain the EST extension
- Threshold inspections: FAA for complex tasks that require tank entry > 10 years: 6 years; for other tasks 2 years. EASA: for tasks => 10 years or => 20000 FH within 6 years
- $\rightarrow$  Text for maintenance documentation

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- Time scale for approving the documents was quite aggressive
- EASA appreciates the effective responses of the TC holders: very much work has been done in a very short time
- →Involvement of PCMs, specialists was time consuming for EASA
- Application for approval of a major change was needed

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# **Development of MRBR**

- TC holders have until 31-12-2006 to develop MRBR
- EASA will approve MRBR: TC holders should use MSG-3 method, or need to substantiate to EASA why they do otherwise (difficult to accept)



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# For operators

- →ADs for Fuel Airworthiness limitations will be published first quarter 2006
- Operators will update maintenance programs with Fuel ALI's
- → Operators will develop the procedures to manage control of CDCCL
- Same compliance time frames as would normally be under Part M.A.302 (ALIS ASAP, other within 12 months)

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## CDCCL

 $\rightarrow$  When revision of CMM is referenced in maintenance documentation: this will have consequences for repair of components which have no relation with CMM

\*For instance for the repair of Fuel Pumps: previously approved repairs 'loose their approved status' if not referenced in the CMM: those repairs have to be re-approved



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### **European Aviation Safety Agency** Statements of Compliance for **SFAR -88**

 $\rightarrow$  EASA will issue statements of compliance for European products stating that the design reviews have been held, reports have been approved, unsafe conditions have been identified and corrective actions have been determined. A planning for development of MRBR will be given (before 31-12-2006)

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# NPA 22-2005

#### → NPA 22-2005 is related to

- Fuel tank safety. Incorporation of the CDCCL into AMC for Part-M, Part-145 and Part-66
- + Paragraph 20 of the explanatory note explain why AMC only is necessary (See slides attachment 1)
- \* Main purpose is to add mention of CDCCL in several existing AMC
- A new paragraph has been added into appendix I to AMC M.A.302 and AMC.M.B.301(b) (maintenance programme) to explain the concept of CDCCL
- → It was published on the EASA web-site on 20.12.2005
- Comment period close on 20.03.2006
- Your comments are welcome!



### European Aviation Safety Agency PART 2 – review of operators ows STCs and major mods directly related to Fuel **Tank System**

- ightarrow This review was recommended to all JAA NAAs by JAA with letter 04/00/02/07/03-L024 from 3 February 2003, see action for JAA operators point 5
- ightarrow EASA knows these reviews were held in some European countries, but we do not have the information that these reviews were held in every JAA NAA
- EASA wants to verify with JAA NAAs that these reviews have been held, potential unsafe conditions have been determined and that corrective actions have been taken
- EASA wrote to all JAA NAAs that the JAA recommendation was originally sent to (see document: the date was 'wrong' 17 January 2005.



European Aviation Safety Agency PART 2 – review of operators ows STCs and major mods directly related to Fuel Tank System

- EASA hopes to have more information the coming months
- → EU MS and JAA operators: feed back: did they perform the exercise?

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### PART 3: EASA ADs and MRBR

- →Under discussion: EASA ADs for non EU products
- $\rightarrow$  Questions for EASA ADs?
- →Questions MRBR?

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 $\div$  Items for importance of FAA? (AD process in USA with FAA)

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# Summary-conclusions



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Attachment 1

Outline of EASA rulemaking framework for Fuel tank Safety



### European Aviation Safety Agency The regulatory framework for fuel tank safety issues

#### Design Approval Holder rules:

- \*Long term: included in the proposed revision of 1592/2002 to extend EASA scope
  - Proposed revision to article 5 would include in the TC: Syllabus for Maintenance certifying staff type rating, syllabus of pilot type rating, MMEL, additional airworthiness specifications for a given type of operations

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- Task 21.039 of rulemaking inventory: Incorporation of 'operational' issues in Type certificate.
- NPA scheduled 3 quarter 2006
- Opinion scheduled 3 quarter 2007.



The regulatory framework for fuel tank safety issues

#### Design Approval Holder rules:

✤In the meantime:

• Use of letters or Airworthiness Directives to request 'reviews' by Design Approval Holders.

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### European Aviation Safety Agency The regulatory framework for fuel tank safety issues

#### → Maintenance rules:

- Maintenance programmes
  - Part-M M.A.302 requires maintenance programmes to be based on data produced by TC holders, STC holders or organisations required to by Part-21.
  - Anything else requires the approval by the competent authority. In the case of ALIs this is
- EASA. Maintenance Data
  - Part-145 145.A.45 requires AMOs to hold and use current maintenance data.
  - The maintenance instructions can only be modified with the approval of the competent authority.





### European Aviation Safety Agency The regulatory framework for fuel tank safety issues

#### → Maintenance rules:

### ightarrowShared responsibility

- In the EU system, the responsibility is shared between the operators, the maintenance organisations and the design organisations.
- The safeguards are already built into the European structure and it is not planned to redistribute the responsibilities.

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