



Notice of Proposed Amendment 2024-03 (A)

in accordance with Article 6 of MB Decision 01-2022

Regular update of CS-ETSO

RMT.0457

EXECUTIVE SUMMARY

This NPA proposes to introduce new or updated standards for parts, taking into account the principles of efficiency and harmonisation.

The objective is to maintain the high level of safety by:

- recognition of the latest industry standards (e.g. EUROCAE Documents (EDs), Radio Technical Commission for Aeronautics Documents (RTCA DOs), or other);
- harmonisation with the corresponding Federal Aviation Administration (FAA) Technical Standard Orders (TSOs);
- incorporation of new ETSOs;
- amendments of existing ETSOs;
- introduction of new guidance material for Subpart A.

The proposed regulatory material is expected to offer more possibilities for EU applicants to obtain ETSO authorisations and to align CS-ETSO with the state of the art and with European operational requirements.

The proposed amendments are expected to ensure a level playing field for European manufacturers and increase the cost-effectiveness of compliance demonstrations.

REGULATION(S) TO BE AMENDED/ISSUED

n/a

ED DECISIONS TO BE AMENDED

[ED Decision 2003/010/RM](#) (CS-ETSO)

AFFECTED STAKEHOLDERS:

Manufacturers of ETSO articles

WORKING METHOD(S)

Development	Impact assessment(s)	Consultation
By EASA	Light	NPA — Public

Related documents / information

[ToR RMT.0457](#) Issue 1, 21.8.2015

PLANNING MILESTONES: Refer to the latest edition of the EPAS Volume II.

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1. About this NPA

1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) identified a set of issues (as described in Chapter 2), and after having assessed the impacts of the possible intervention actions identified rulemaking as the necessary intervention action.

This rulemaking activity is included in the 2024 edition of Volume II of the European Plan for Aviation Safety (EPAS) for 2023–2025¹ under Rulemaking Task (RMT).0457.

EASA developed the regulatory material in question in line with Regulation (EU) 2018/1139² (the Basic Regulation) and the Rulemaking Procedure³, as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for this RMT⁴.

1.2. How to comment on this NPA

The draft regulatory material is hereby submitted for consultation of the public.

Please submit your comments using solely the dedicated **Comment-Response Tool (CRT)** available at <https://hub.easa.europa.eu/crt/>⁵.

To facilitate the collection and technically support the subsequent review of comments by EASA in an efficient, controlled, and structured manner, stakeholders are kindly requested to submit their comments to the respective predefined segments of the NPA within the CRT, and refrain from submitting specific comments or all their comments to the 'General Comments' segment.

Further, once all comments are placed to the respective predefined segments, there is no need to submit them (as a pdf attachment) to the 'General Comments' segment.

The deadline for the submission of comments is **3 July 2024**.

1.3. The next steps

Following the consultation of the draft regulatory material, EASA will review all the comments received and will duly consider them in the subsequent phases of this rulemaking activity.

¹ [European Plan for Aviation Safety \(EPAS\) 2023-2025 | EASA \(europa.eu\)](#)

² Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139>).

³ EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 (<https://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-01-2022-rulemaking-procedure-repealing-mb>).

⁴ [ToR RMT.0457 Regular update of CS-ETSO](#)

⁵ In case of technical problems, please send an email with a short description at crt@easa.europa.eu.

Considering the above, EASA may issue a Decision amending the Certification Specifications for European Technical Standard Orders (CS-ETSO).

When issuing the Decision, EASA will also provide feedback to the commentators and information to the public on who engaged in the process and/or provided comments during the consultation of the draft regulatory material, which comments were received, how such engagement and/or consultation was used in rulemaking, and how the comments were considered.



2. In summary — why and what

2.1. Why we need to act — issue/rationale

ETSOs are defined in Article 1(2)(g) of Regulation (EU) No 748/2012⁶ as detailed airworthiness specifications issued by EASA to ensure compliance with the requirements of that Regulation as a minimum performance standard for specified articles (i.e. ‘parts’ as defined by Article 3(4) and ‘non-installed equipment’ as defined in Article 3(29) of the Basic Regulation; see Article 1(2)(f) of Regulation (EU) No 748/2012).

Worldwide aircraft experience, as well as scientific and technical progress, need to be reflected in existing or new ETSOs. The experience and progress lead to evolution of the industry standards which are referred to in the ETSOs. Also, given that the FAA TSOs evolved and some gaps appeared in respect of ETSOs, the alignment of the standards’ technical content would facilitate the mutual recognition in the context of bilateral agreements.

These evolutions need to be reflected in existing and new ETSOs to ensure a level playing field for European industry and the possibility to introduce new article features in a safe way. Evolved standards would generally increase the safety level of the ETSO authorised equipment.

The European Industry is asking for the introduction of the latest standards to enhance readiness and competitiveness on a worldwide scale.

A detailed description of the identified issues is provided below in Section 2.2.

2.2. Description of the issues

2.2.1. Recognition of the latest industry standards

Issue 1: ETSO-C112 ‘Secondary Surveillance Radar Mode S Transponder’ — The EUROCAE standard ED-73E, referenced currently in ETSO-C112e, has been superseded by ED-73F Change 1 which is proposed to be referenced in ETSO-C112f. This update also addresses the harmonisation with FAA TSO-C112f that is already published.

Issue 2: ETSO-C166 ‘Extended Squitter Automatic Dependent Surveillance-Broadcast (ADS-B) and Traffic Information Services-Broadcast (TIS-B) equipment operating on the Radio Frequency of 1090 Megahertz (MHz)’ — The EUROCAE standard ED-102A, referenced currently in ETSO-C166b A3, has been superseded by ED-102B Change 1 which is proposed to be referenced in ETSO-C166c. This update also addresses the harmonisation with FAA TSO-C166c that is already published.

Issue 3: ETSO-2C502 ‘Helicopter Crew and Passenger Integrated Immersion Suits’ — In 2023 the industry issued (the first) standard for ‘Rotorcraft immersion suits’ (document ref. EN4863:2023). This standard provides better/improved provisions compared with the current MOPS included in ETSO-2C502. The industry has largely started using this standard for their articles.

⁶ Commission Regulation (EU) No 748/2012 of 3 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations (OJ L 224, 21.8.2012, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32012R0748&qid=1706191409841>).

Issue 4: ETSO-2C503 ‘Helicopter Crew and Passenger Immersion Suits for operations to or from Helidecks located in a Hostile Sea Area’ – In 2023 the industry issued (the first) standard for ‘Rotorcraft immersion suits’ (document ref. EN4863:2023). This standard provides better/improved provisions compared with the current MOPS included in ETSO-2C503. The industry has largely started using this standard for its articles.

Issue 5: ETSO-2C504 – ‘Helicopter Constant-Wear Lifejackets for Operations to or from Helidecks Located in a Hostile Sea Area’ — In 2023 the industry issued (the first) standard for ‘Rotorcraft Constant Wear Lifejackets’ (document ref. EN4862:2023). This standard provides better/improved provisions compared with the current MOPS included in ETSO-2C504. The industry has largely started using this standard for their articles.

Issue 6: ETSO-2C505 ‘Helicopter Life Rafts for Operations to or from Helidecks Located in a Hostile Sea Area’ — In 2022 the industry issued (the first) standard for ‘Rotorcraft Liferaft’ (document ref. prEN4886:2022). This standard provides better/improved provisions compared with the current MOPS included in ETSO-2C505. The industry has largely started using this standard for their articles.

Issue 7: ETSO-2C519 ‘Emergency Breathing Systems (EBSs)’ — The ASD-STAN standard prEN4856:2018, referenced currently in ETSO-2C519, has been superseded by EN4856:2023 which is proposed to be referenced in ETSO-2C519a.

The subset of ETSO-2C502, ETSO-2C503, ETSO-2C504, ETSO-2C505 and ETSO-2C519 could provide direct support in complying with operational rules (SPA.HOFO and related AMC) addressing such equipment. The current ETSOs reference outdated versions of international standards either being unavailable or being superseded by multiple other references difficult to track. Therefore, a dedicated working group from ASD-STAN, Domain 12 (Cabin) WG02 (Ditching Equipment), has been tasked, within the wider frame of RMT.0120 *Ditching Occupant Survivability* and RMT.0392 *Regular update of air operations rules*, to review the available standards for rotorcraft ditching equipment. This activity has resulted in industry standards being self-contained, with harmonised definitions, latest terminology use, presenting the same document structure and same cross-requirements in terms of compatibility for integrated systems made of more equipment.

2.2.2. Harmonisation with FAA TSOs

Issue 8: ETSO-C90 ‘Cargo Pallets, Nets and Containers (Unit Load Devices)’ — FAA TSO-C90e was published in July 2021. The European industry has asked for the evolution of the equivalent ETSO in order to ensure the competitiveness of the European manufacturers on the global market. In the absence of such evolution, the European manufacturers will not be able to provide article functions, except through a deviation. However, deviations are not fully understood by the potential customers, reducing thus the competitiveness in relation with the articles which are provided and certified by US manufacturers.

Issue 9: ETSO-C132 ‘Geosynchronous Orbit Aeronautical Mobile Satellite Services Aircraft Earth Station Equipment’ — FAA TSO-C132b was published in January 2021. The European industry has asked for the evolution of the equivalent ETSO in order to ensure the competitiveness of the European manufacturers on the global market.

Issue 10: ETSO-C159 ‘Next Generation Satellite Systems (NGSS) Equipment’ – FAA TSO-C159e Chg. 1 was published in September 2023. The European industry has asked for the evolution of the equivalent ETSO in order to ensure the competitiveness of the European manufacturers on the global market.

Issue 11: ETSO-C164 ‘Night Vision goggles (NVG)’ – FAA TSO-C164a was published in October 2015. The European industry has asked for the evolution of the equivalent ETSO in order to ensure the competitiveness of the European manufacturers on the global market.

2.2.3. Introduction of new ETSOs

Issue 12: ETSO-C220 ‘GNSS-Aided Inertial Systems’ — Currently, no ETSO exists to support the development of GNSS-aided inertial systems. This new standard provides specific requirements to develop these systems according to the newly published RTCA DO-384 standard. The equivalent FAA TSO-C220 was published in June 2023.

2.2.4. Amendments of existing ETSOs

Issue 13: ETSO-C30 ‘Aircraft Position Lights’ — The existing technical MOPS provide only minimum emission requirements to be met. EASA observed large angular variations on the lights emissions in designs authorised in the last years. These large variations may lead to misinterpretation of the distance of the light source.

Issue 14: ETSO-C96 ‘Anticollision Light Systems’ — The existing technical MOPS provide only minimum emission requirements to be met. EASA observed large angular variations on the lights emissions in designs authorised in the last years. These large variations may lead to misinterpretation of the distance of the light source.

Issue 15: ETSO-2C169 ‘VHF Radio Communications Transceiver Equipment operating within the radio frequency Range 117.975 to 137.000 Megahertz’ — Addition of specific requirements for VHF Communications Antennas and specific requirements for VHF Communications Equipment Control Panels design.

Issue 16: ETSO-2C521 ‘Electronic Flight Bag (EFB) Software Applications’ — Clarification for minimum performance specifications for the EFB Host Platform to be introduced in ETSO-2C521 A1.

2.2.5. Introduction of new guidance material for Subpart A

Issue 17: CS-ETSO Subpart A – Currently, there are references to outdated standards and acceptable means of compliance applicable to software and airborne electronic hardware design. Also, the guidance for the development assurance process required for ETSO articles is outdated.

2.3. Who is affected by these issues

Manufacturers of ETSO articles.

2.4. How could the issue evolve

In the absence of updates, the EU industry will be put at a competitive disadvantage on the market because of providing articles that are compliant with standards that are outdated and not aligned with those used by US competitors.

2.5. Conclusion on the need for rulemaking

EASA concluded, in consideration of the impacts created (see Chapter 3 below), that an intervention was necessary and that non-regulatory actions cannot effectively address the issues. Therefore, revised ETSOs are required.

2.6. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. The regulatory material presented here is expected to contribute to achieving these overall objectives by addressing the issues described in Section 2.2.

More specifically, with the regulatory material presented here, EASA intends to:

- recognise the latest industry standards (e.g. EUROCAE Documents (EDs), Radio Technical Commission for Aeronautics Documents (RTCA DOs), or other);
- harmonise with the corresponding Federal Aviation Administration (FAA) Technical Standard Orders (TSOs);
- increase the overall safety of the ETSO articles by incorporating the latest technical standards;
- alleviates the certification process at aircraft level by credits to ETSOA;
- avoid duplications of certification activities;
- facilitate straightforward mutual recognition by bilateral partners;
- provide support to the ETSOA applicants in demonstrating compliance with software, airborne electronic hardware and development assurance requirements.

2.7. How we want to achieve it — overview of the proposed amendments

The amendments proposed by this NPA are listed below.

Issue 1: ETSO-C112f ‘Secondary Surveillance Radar Mode S Transponder’

The main objective of this update is to incorporate the latest revision of the EUROCAE standard ED-73F Change 1 into ETSO-C112f. This update allows to support new functionalities required by forthcoming amendments of the certification specifications (CS-ACNS) and airspace usage requirements (Annex to Regulation (EU) No 1332/2011 – Part-AUR). The update is tied to the ADS-B Out rule change because a combined transponder / ADS-B Out unit compliant with ETSO-C166c must also be compliant with ETSO-C112f. The new revision is also in harmonisation with the technical content of FAA TSO-C112f.

Issue 2: ETSO-C166c ‘Extended Squitter Automatic Dependent Surveillance-Broadcast (ADS-B) and Traffic Information Services-Broadcast (TIS-B) equipment operating on the Radio Frequency of 1090 Megahertz (MHz)’

The main objective of this update is to incorporate the latest revision of the EUROCAE standard ED-102B Change 1 into ETSO-C166c. This update allows to support new functionalities required by forthcoming certification specifications (CS-ACNS) and operational rules. The update is tied to the ETSO-C112f change because a combined transponder / ADS-B Out unit compliant with ETSO-C112f

must also be compliant with ETSO-C166c. This also guarantees full harmonisation of the EASA ETSO with FAA TSO-C166c.

Issue 3: ETSO-2C502a ‘Rotorcraft Integrated Immersion Suits’

The existing ETSO requirements have been replaced by the recognition of the latest industry standard ASD-STAN (document EN4863:2023). The title is also amended to reflect the referenced industry standard.

Issue 4: ETSO-2C503a ‘Rotorcraft Immersion Suits for Operations to or from Helidecks Located in a Hostile Sea Area’

The existing ETSO requirements have been replaced by the recognition of the latest industry standard ASD-STAN (document EN4863:2023). The title is also amended to reflect the referenced industry standard.

Issue 5: ETSO-2C504a ‘Rotorcraft Constant-wear Lifejackets for operations to or from Helidecks located in a Hostile Sea Area’

The existing ETSO requirements have been replaced by the recognition of the latest industry standard ASD-STAN (document EN4863:2023). The title is also amended to reflect the referenced industry standard.

Issue 6: ETSO-2C505a ‘Helicopter Life Rafts for Operations to or from Helidecks Located in a Hostile Sea Area’

The existing ETSO requirements have been replaced by the recognition of the latest industry standard ASD-STAN (document prEN4886:2022). The title is also amended to reflect the referenced industry standard.

Note At the time of publication of this NPA, the standard prEN4886:2022 is in the process of consolidation and it will be published as EN4886:yyyy. This will be taken into consideration by EASA when publishing CS-ETSO Amendment 19.

Issue 7: ETSO-2C519a ‘Emergency Breathing Systems (EBSs)’

The ASD-STAN standard (document prEN4856:2018), referenced currently in ETSO-2C519, has been superseded by document EN4856:2023 which is proposed to be referenced in ETSO-2C519a. The standard was accounted for two categories of functionalities. It has been revised to remove categories with focus given on the specific functionality required by operational rules (rapid underwater deployment).

Issue 8: ETSO-C90e ‘Cargo Pallets, Nets and Containers (Unit Load Devices)’

The revised standard introduces novel requirements for enhanced fire properties related to unit load devices (ULDs) and how these properties could affect compatibility among ETSO cargo equipment.

Issue 9: ETSO-C132b ‘Geosynchronous Orbit Aeronautical Mobile Satellite Services Aircraft Earth Station Equipment’

The revised standard introduces novel requirements for the improved diplexer low noise amplifier (DLNA) part of ETSO satellite aircraft station equipment.

Issue 10: ETSO-C159e ‘Next Generation Satellite Systems (NGSS) Equipment’

The revised standard introduces novel requirements for enhanced avionics supporting next generation satellite systems (NGSS).

Issue 11: ETSO-C164a ‘Night Vision goggles (NVG)’

The revised standard aligns the ETSO with the most current FAA TSO revision.

Issue 12: ETSO-C220 ‘GNSS-Aided Inertial Systems’

This new standard supports the development of GNSS-aided inertial systems according to the RTCA DO-384 standard. This standard is technically equivalent to the FAA TSO-C220 to guarantee the competitiveness of the European Industry.

Issue 13: ETSO-C30d A1 ‘Aircraft Position Lights’

This revision includes specific requirements for tolerance of light emission intensity to guarantee a homogeneous emission across the entire envelope of radiation.

Issue 14: ETSO-C96c A1 ‘Anticollision Light Systems’

This revision includes specific requirements for tolerance of light emission intensity to guarantee a homogeneous emission across the entire envelope of radiation.

Issue 15: ETSO-2C169b ‘VHF Radio Communications Transceiver Equipment operating within the radio frequency Range 117.975 to 137.000 MegaHertz’

This revision includes specific requirements for the ETSO authorisation of VHF communications antennas. It also includes specific human factors requirements for VHF communications equipment control panels design, to mitigate the detrimental effects of the multitude of different HMI implementations available on equipment designed for the lower end of the General Aviation market. This aims to increase the general safety level of this specific sector while maintaining the competitiveness of the European industry.

Issue 16: ETSO-2C521 A1 ‘Electronic Flight Bag (EFB) Software Applications’

This revision includes specific requirements for the declaration of the minimum performance specifications for the EFB Host Platform (hardware and operating system). The aim is to increase the general level of safety of these applications, by mitigation of incompatibilities that may affect the EFB performance in flight.

Issue 17: CS-ETSO Subpart A

This revision provides updated paragraphs 2.2 and 2.3 to references to the specific acceptable means of compliance for those software and hardware designs based on multi-core processors (MCP).

It is also proposed to extend Section 2.4, to cover the accepted means of compliance for the development assurance of the ETSO article (new paragraph 2.4.2). The heading of paragraph 2.4 is modified accordingly.

In addition, the new paragraph 2.4.2 includes conditions regarding applicants' procedures documenting the development assurance process and regarding expected certification data.

2.8. Targeted applicability of the regulatory material

This amendment of the Certification Specifications for European Technical Standard Orders (CS-ETSO) is to enter into force and become applicable by the end of 2024.

However, this amendment shall not apply to ETSO authorisation applications received until 6 months after the date of entry into force of the respective EASA Decision, if the applicant requests so and if they can demonstrate that the process of development of the relevant part or appliance started before the entry into force of the respective Decision, in accordance with the specifications applicable at that time.

Within the 6-month period mentioned above, on applicant request, EASA may accept compliance demonstration with this CS-ETSO amendment.

2.9. Legal basis

The legal basis for amending CS-ETSO is point 21.B.70 of Annex I to Commission Regulation (EU) No 748/2012 regarding the issuance of certification specifications and other detailed specifications, including certification specifications for airworthiness, operational suitability data and environmental protection, that competent authorities, organisations and personnel may use to demonstrate compliance of products, parts and appliances with the relevant essential requirements set out in the Basic Regulation.

2.10. What are the stakeholders' views

Generally, the European industry welcomes the harmonisation and the alignment between FAA and EASA standards, as this contributes to increasing the safety (by adopting the latest technical standards) and guarantees the competitiveness of the EU industry on the global market.

More specifically, the European industry is deeply concerned about the delays of the release of ETSO-C90e. The FAA released TSO-C90e in July 2021 and ETSO-C90e is expected to be released in Q3/2024.

This means that the article manufacturers under the FAA jurisdiction are already able to offer fire-resistant containers, T / U sized pallets and nets certified to TSO-C90e to the market whilst the European-based article manufacturers are unable to offer any of those articles certified to C90e. This creates an unlevel playing field and a technical disadvantage for the European manufacturers.

The subset of ETSO-2C502, ETSO-2C503, ETSO-2C504 and ETSO-2C519 has been revised to update the industry standard referenced therein. Overall, it represents a definite improvement and simplification for the EU industry concerned with the certification of such equipment.



3. Expected benefits and drawbacks of the proposed regulatory material

Rulemaking intervention was considered necessary due to accumulation of revised industry standards and amendments of FAA TSOs.

Technology is continuously evolving, creating the need for either development of new industry standards or update and improvement of existing ones (to which existing ETSOs refer). This drives the need to develop new ETSOs or to revise existing ones. This will contribute to ensuring that parts to be used on aircraft meet the latest and safest standards, and benefit from the most advanced technological solutions.

The proposed regulatory material will alleviate existing regulatory burden by:

- amending some of the existing ETSOs, dated back to CS-ETSO Amendment 1, that reference obsolete/unavailable industry standards. This limits the entrance of new players in the market;
- updating certain test procedures, as test houses do not support any more procedures according to old industry standards for certification purposes;
- recognising the latest industry standards, avoiding thus the need for applying for ‘positive deviations’ in the ETSO authorisation process and increasing the overall safety of the authorised equipment;
- referencing the latest industry standards which account for inputs from in-service experience and continued airworthiness issues;
- clarifying existing requirements, reducing thus arbitrariness and misinterpretation, which in turn reduces the ETSO authorisation effort for the applicants.

Following an assessment of the impacts of the proposed regulatory material, no drawbacks are identified.

4. Proposed regulatory material

Please refer to NPA 2024-03 (B) 'Proposed amendments to CS-ETSO'



5. Monitoring and evaluation

No monitoring provisions are considered necessary for this regular update.



6. Proposed actions to support implementation

EASA has created a specific webpage⁷ in order to simplify the identification and the download of the current ETSOs.

For consultation purposes, EASA has also created a specific webpage⁸ that lists all (current and historic) ETSOs.

No additional actions are foreseen to support the implementation of new and amended ETSOs.

⁷ [List of current ETSOs | EASA \(europa.eu\)](#)

⁸ <https://www.easa.europa.eu/easa-and-you/aircraft-products/etso-authorisations/list-of-all-etso>

7. References

None



Appendix — Quality of the NPA

To continuously improve the quality of its documents, EASA welcomes your feedback on the quality of this document with regard to the following aspects:

Please provide your feedback on the quality of this document as part of the other comments you have on this NPA. We invite you to also provide a brief justification, especially when you disagree or strongly disagree, so that we consider this for improvement. Your comments will be considered for internal quality assurance and management purposes only and will not be published, (e.g. as part of the CRD).

1. The regulatory proposal is of technically good/high quality

Please choose one of the options below and place it as a comment in the CRT; if you disagree or strongly disagree, please provide a brief justification.

Fully agree / Agree / Neutral / Disagree / Strongly disagree

2. The text is clear, readable and understandable

Please choose one of the options below and place it as a comment in the CRT; if you disagree or strongly disagree, please provide a brief justification.

Fully agree / Agree / Neutral / Disagree / Strongly disagree

3. The regulatory proposal is well substantiated

Please choose one of the options below and place it as a comment in the CRT; if you disagree or strongly disagree, please provide a brief justification.

Fully agree / Agree / Neutral / Disagree / Strongly disagree

4. The regulatory proposal is fit for purpose (achieving the objectives set)

Please choose one of the options below and place it as a comment in the CRT; if you disagree or strongly disagree, please provide a brief justification.

Fully agree / Agree / Neutral / Disagree / Strongly disagree

5. The regulatory proposal is proportionate to the size of the issue

Please choose one of the options below and place it as a comment in the CRT; if you disagree or strongly disagree, please provide a brief justification.

Fully agree / Agree / Neutral / Disagree / Strongly disagree

6. The regulatory proposal applies the ‘better regulation’ principles^[1]

Please choose one of the options below and place it as a comment in the CRT; if you disagree or strongly disagree, please provide a brief justification.

Fully agree / Agree / Neutral / Disagree / Strongly disagree

^[1] For information and guidance, see:

- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en
- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en
- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox/better-regulation-toolbox_en

7. Any other comments on the quality of this document (please specify)

