

SIDE MEETING #2

(Cabin Definition: mature design proposals on application date)

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Cabin Definition: mature design proposals on application date

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Certification Programme

Certification Programme

21.A.93 on “Application” states that:

“An application shall include, or be supplemented after the initial application by, a certification programme for the demonstration of compliance ..., consisting of:

1. a description of the change ...

2. an identification of any reinvestigations necessary to demonstrate compliance of the change and areas affected by the change with the type-certification basis,...

3. for a major change to a type-certificate:

(i) a proposal for the initial type-certification basis, ...;

(ii) a proposal for a breakdown of the certification programme into meaningful groups of compliance demonstration activities and data, including a proposal for the means of compliance and related compliance documents;

(iii) a proposal for the assessment of the meaningful groups of compliance demonstration activities and data,....

..., the application shall include a proposal for the Agency's involvement in the verification of the compliance demonstration activities and data; and

(iv) a project schedule including major milestones.”

Certification Programme

When to provide the CP to EASA?

- EASA expects Certification Programme on a project to be provided together with the application (technical investigation is not started by EASA before CP is available).
 - But before being ready to send the Certification Programme (or even the application) to EASA, Applicants may have questions on:
 - the certification approach in general
 - the classification of the change
 - how to treat design novelties
 - the applicable type certification basis (TCB)
 - applicability of specific paragraphs of the TCB
 - the means of compliance intended to be used
 - ...
- ⇒ For simple questions contact DOATL or PCM (if known) – even possible before application
- ⇒ More detailed questions (meeting or detailed review needed) to be raised to PCM in the project
- ⇒ PAC/TAC to request guidance on the entire certification approach from EASA

Certification Programme

When to update the CP?

- The CP is considered a “living document”.
- Applicants should consider updating the CP when:
 - the entire certification approach has changed,
 - the scope of the project has considerably changed,
 - the first review loop from the EASA team has been completed and relevant comments from EASA could be included to seek final agreement
 - Change of LOI agreed with the Agency or driven by unexpected outcomes (failed test) from compliance demonstrations
 - Any (Major) failure is registered in delegated activities (e.g., Failure in design installation having a high impact on Aircraft Safety or that may affect previously proposed demonstration of compliance strategy).

Certification Programme

1. Description of Change

- What kind of information is needed for EASA Experts and PCMs to understand the relevant aspects of the change?
- Important to be covered:
 - Basic aircraft (configurations) to which the change should be applied.
 - Comparison of pre- and post-mod configuration(s) of the areas affected by the change.
 - ⇒ This is specifically relevant for physical changes to the cabin, where a comparison should be provided and supported by drawings, pictures, photos ...
 - The description should be sufficiently clear to detail essential characteristics of the design
 - ⇒ focus on characteristics that are driving the certification approach / demonstration of compliance (e.g. article P/N with existing article approval)

Certification Programme

2. “*identification of reinvestigations*” / Certification Approach

- What is the philosophy behind the way how compliance is intended to be demonstrated with applicable TCB:
 - new compliance demonstration
 - partially new compliance demonstration
 - Use of existing compliance demonstration data based on similarity to previously approved design.
 - ⇒ need for existing approval of applicant (or other DOA with DOA-DOA arrangement)
 - ⇒ Previous compliance demonstration still valid (original MoC and associated compliance report(s) to be listed in Cert. Plan) + MoC 1 for evident similarity or MoC 2 for more detailed similarity analysis
 - ⇒ Justification of similarity by (S)TC Holder statement (from Office of Airworthiness!)
 - ⇒ Previous compliance data from 3rd parties cannot be used without DOA-DOA arrangement (protection of intellectual property)
 - Justification of unaffected areas (if not obvious).
 - Use of existing (E)TSO approval (detailed installation still to be demonstrated)
 - ...

Certification Programme

3. Contents

- “(i) *proposal for the initial type-certification basis*”
 - ⇒ Applicants to check for applicability of published EASA Special Conditions (SC)!
 - ⇒ Any need for Equivalent Safety Finding (ESF) or even Deviation (DEV)?
 - ⇒ EASA team may see the need to complement proposal (21.A.101(d) / Step 8 „adequate” CB).
- „(ii) *proposal for ... meaningful groups of compliance demonstration activities and data*” / CDIs including:
 - proposal for means of compliance
 - related compliance documents.
 - ...
 - ⇒ Applicants are free to define what makes the grouping of CDIs “meaningful” for their change, ...but
 - ⇒ Sub-grouping of CDIs in accordance with the affected disciplines (EASA Panels to be involved) may help in performing the risk assessment for the proposal of EASA LoI!

Certification Programme

3. Contents ...

- *“(iii) proposal for the assessment of the meaningful groups of compliance demonstration activities and data,... proposal for the Agency's involvement ...”*
 - ⇒ What are the analyses, tests, inspections, ... planned and where and how should EASA be involved?
 - ⇒ Sound reference to existing AMC or alternative proposed ones.
 - ⇒ Article qualification supporting certification of installation at aircraft level (MoC2+9),
NOTE: IPC, CMM, ANM, OEM Specs are not sufficient to provide evidence of compliance without DOA evaluation of relevant compliance document (test plan, test report, analysis).
 - ⇒ Reference to DOA experience in identical/similar demonstration of compliance task with similar complexity agreed with EASA to support LOI definition
 - ⇒ List of Demonstration of Compliance Document (as part of CP CCL) and Test planned
 - ⇒ Part 26 CCL with clear definition of Operational and Airworthiness action perimeter.

Certification Programme

3. Contents ...

- *“(iv) project schedule including major milestones ...”*
 - ⇒ Establish a “realistic” schedule!
 - ⇒ Please allow for planning of involvement from EASA side (e.g. review of test plans before actual test is performed, checking availability of EASA team members if witnessing is anticipated ...)!

Compliance Demonstration Activities

Compliance Demonstration Activities

Compliance Documents

- System/Article description should be exhaustively defined for its performance associated to the test demonstration.
- In line **with 21.A.33 Inspections and tests**
 - Test Article configuration (Material and processes, type design data, manufacturing/construction/and assembly)
 - Test Set-up definition (for each test case)

must be sufficiently detailed to support relevant Conformity activities for Test Article and test set-up.

Any deviation should be supported by a statement that ensure that intended test demonstration is not affected.

- System/Article description should be exhaustively defined for its performance associated to the test demonstration.
- Instruments and their calibrations must be mandated in the test plan and collected in its report
- the test cases, methods, and procedures for test execution;
- the pass–fail criteria; and
- pre-, during- and post-test inspections.
- Design change evaluation with clear investigation of any design evolution on design performances and any prior demonstrated compliance.
- DOA procedure must be respected anytime.

Industry topics/EASA feedback

Industry topics/EASA feedback

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Thank you for your participation!

Pre-Application (PAC) / Technical Advice Contract (TAC)

PACs and TACs are tools offered by EASA Innovation Services to:

- Support introduction of a product with embodied innovative or disruptive technologies (Category 2, PAC). Expected outcomes of a PAC are the draft generic elements that will:
 - be the foundation for the subsequent establishment by the Agency of the formal product certification basis (in the form of applicable Certification Specifications (CSs), plus optionally to be consulted and published Special Conditions (SCs) and Equivalent Safety Findings (ESFs)) and its Interpretative Material and Means of Compliance (MoC) once the application for a certificate is submitted.
 - also include launching the development of the regulatory actions that are — or have previously been — identified in the regulatory action plans
- Provide technical advice for a specific technical matter (Category 3, TAC). Expected outcome of a TAC:
 - Technical Report

<https://www.easa.europa.eu/en/document-library/application-services/innovation-services>