

# SIDE MEETING #3

## OSD in certification processes

Andrea Boiardi - Chief Expert OSD

Anssi Karhunen - Senior Expert FCD

Giuseppe Izzi – Senior Expert MMEL

Massimiliano Bazzocchi – Senior Expert MCSD

Angela Gallorini, Vairis Velde – CCD Experts

**EASA** Part 21  
Implementation Workshop

**Cologne, Germany**  
March 10, 2026

# OSD in certification processes

## CONTENTS

- Objectives
- Introduction to the OSD Team
- Update on future OSD regulatory developments
- Answers to queries provided to EASA in advance
- Q&A open discussion

# Objectives

- Introduce some of the members of the EASA OSD Team
- Provide support to applicants on compliance to OSD requirements
- Answer specific questions provided to EASA in advance
- Listen to issues raised by applicants and provide support
- Reply to (or take under advice) additional questions the audience may have



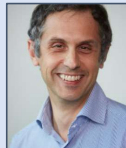
# The EASA OSD Team



Andrea Boiardi  
Chief Expert OSD



**Panel 2**  
Anssi Karhunen  
Senior Expert FCD



**Panel 15**  
Giuseppe Izzi  
Senior Expert MMEL



**Panel 16**  
Andrea Boiardi  
Acting Senior SIMD



**Panel 17**  
Andrea Boiardi  
Acting Senior CCD



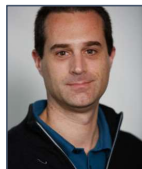
**Panel 18**  
Massimiliano Bazzocchi  
Senior Expert MCSD



Roel Huysmans



Julien Colinos



Mathieu Quoi



Jari Vilenius



Angela  
Gallorini



Vairis Velde



Marco Manodori  
Sagredo



Marcello Cauchi  
Savona



Stefano Oprandi



Ascanio Russo



External Experts

# Update on future OSD regulatory developments

**EASA** Part 21  
Implementation Workshop

**Cologne, Germany**  
March 10, 2026

# Evolutions in Part-21

Opinion Expected in March-April 2026

- ✓ Simplification of the GM to 21.A.93 associated with OSD
- ✓ Alignment of GM terminology on appreciable/not-appreciable vs. major/minor
- ✓ Inclusion of missing GM for MCSD
- ✓ Completion of table 1 in GM No 1 to 21.A.93(b)(1)
- ✓ Inclusion of flight test category for OSD flights in Appendix XII



# Regular update to CS-FCD

NPA expected by Q2 2027

- ✓ Possible simplification of CS structure for better readability and usability
- ✓ Revision of training tools following RMT.0196
- ✓ Possible introduction of an alternative to the T5 test
- ✓ Improvement in the “variant” determination
- ✓ Possible review of the “training footprint” format and content
- ✓ Expand the description of the purpose and development criteria for TASE

# Regular update to CS-SIMD

NPA expected by Q2 2027

- ✓ Review to assess changes stemming from RMT.0196



# Regular update to CS-CCD

NPA expected by Q4 2027

- ✓ Structural improvements for better readability and usability
- ✓ Improvement and alignment of TSD list and ADT contents
- ✓ Improvement of determination criteria for variants and types

# Answers to queries provided to EASA in advance

**EASA** Part 21  
Implementation Workshop

**Cologne, Germany**  
March 10, 2026

# Query 1

**How to qualify a CVE in the field of OSD FCD? Does the person need both flight crew and engineering skills?**

A CVE in the FCD discipline should possess two main competences:

1. Be familiar with the aircraft from a pilot perspective and with flight crew training to the level necessary to perform the required assessment;
2. Have an understanding of the certification process to the extent to ensure formal compliance with the applicable specifications and requirements.

*Note: Typically, the CVE is an engineer, familiar with the certification compliance processes and the OSD, and he/she is supported by a small team including pilots having familiarity with the aircraft and acting as instructors. In other cases, is a pilot supported by engineers.*



# Query 2

**Can the classification and certification aspects of OSD be subcontracted? If so: what are the knowledge and procedures required within the design holder DOA? be contracted out to an external DOA by splitting the project into two separate entities? E.g.**

- **project #1: design project done by DOA #A**
- **project #2: OSD aspects done by DOA #B**

It is possible to subcontract OSD classification and compliance activities to another entity.

However, the DOA responsible for the TC/STC/Change approval has to have the OSD in their scope of approval. The competence may be acquired and maintained via a sub-contract agreement with the other entity (DOA or not).

The process, including selection and qualification of the subcontracted entity, needs to be duly described in the DOH and the responsibility is retained by the DOA.

It is not possible to formally split the project in two as the approval is one and issued to the responsible DOA #A. As mentioned, DOA #B would only act as a subcontracted entity.

# Query 3

**Can a DOA create stand-alone MEL for a system that is designed by another DOA / TCH?**

We assume the question is about MMEL, rather than MEL. No, they cannot. The MMEL is associated with the specific design and it is held and controlled by the DAH.

# Query 4

**Through a change a certain system is removed from the aircraft. This system is accompanied by a MEL chapter / item. Can this MEL chapter / item simply be removed (as the system is not present anymore)? Are any privileges required to remove the MEL item?**

We assume the question is about MMEL, rather than MEL. Firstly, we must assume that the change is technically correct and demonstrated compliant. The MMEL item can be removed with the change, or after as stand-alone.

If the removal is performed by the DOA under their privileges, MMEL needs to be part of their scope (i.e. not excluded in the TOA limitation).

The removal can be done post type design change approval as minor, which can be applied for the Agency by anyone.

However, we do not encourage this approach, as the effect on the MMEL should be kept connected with the change to type design.



# Query 5

**When do changes to emergency equipment (type, relocation, change in stowage and access) require new training requirements?  
When is OSD affected?**

“Training requirements” is generic and may have slightly different meaning depending on the perimeter. These changes to emergency equipment may affect training under the Air Operations requirements and the responsibility of the Operator.

However, from a certification perspective, CS-CCD does not consider changes to portable safety and emergency equipment as one of the elements determining an effect on CCD.

However, according to CS-CCD Issue 2 article CCD.305 (a)(1), an applicant may elect to provide supplementary data to support the development of relevant training programs by the end users, such as data which can include portable safety and emergency equipment.

When provided by the applicant in the CCD, these data become mandatory for the end users.

# Query 6

**In an STC project where no formal OSD approval is required, but the change may have indirect impact on existing OSD data (e.g. CCD or FCD), what level of OSD impact assessment does EASA expect from a DOA? Should this assessment be formally integrated into the Certification Programme?**

We do not believe that an STC, where no “formal” OSD approval is required, exist. An STC is a change to a TC and, as such, the design modifications have to be assessed for their effect on the TC certification basis, including OSD.

It is therefore the duty of the STC applicant to perform the assessment of the effect on the OSD certification basis and document it in the certification program and, where the OSD are affected, generate the associated CDI, or include the effect in a CDI.

In general, the effect on the OSD CB should be documented at the same level of any other effect on the type certification basis. When the effect is not straightforward, a short rationale may be necessary.

# Query 7

**When concluding that a change has “no OSD impact”, what minimum analyses or justifications would EASA consider sufficient to support that conclusion?**


The analysis of the effect of a change/modification on the OSD certification basis shall be documented in the certification program. When the case is straightforward, a short sentence may be sufficient to justify that the OSD (or one specific OSD discipline) is not an affected area. In less obvious cases, a more extensive explanation of the analysis performed, or additional justification documents, could be required. A familiarization with the expert(s) may help in developing the CP.



# Q&A session

**EASA** Part 21  
Implementation Workshop

**Cologne, Germany**  
March 10, 2026

A close-up photograph of a hand holding a piece of white chalk, writing the letters 'Q&A' on a dark, textured surface that resembles a chalkboard. The hand is positioned on the left side of the frame, with the fingers gripping the chalk. The letters are written in a casual, slightly messy style.

slido

Join at  
**slido.com**  
**#1706 658**





# Thank you for your participation!