

# Deviation Request ETSO-C142a#1 for an ETSO approval for CS-ETSO applicable to NON-RECHARGEABLE LITHIUM CELLS AND BATTERIES (ETSO-C142a)

## Consultation Paper

### 1 Introductory Note

The hereby presented deviation requests shall be subject to public consultation, in accordance with EASA Management Board Decision No 7-2004 as amended by EASA Management Board [Decision No 12-2007](#) products certification procedure dated 11th September 2007, Article 3 (2.) of which states:

“2. Deviations from the applicable airworthiness codes, environmental protection certification specifications and/or acceptable means of compliance with Part 21, as well as important special conditions and equivalent safety findings, shall be submitted to the panel of experts and be subject to a public consultation of at least 3 weeks, except if they have been previously agreed and published in the Official Publication of the Agency. The final decision shall be published in the Official Publication of the Agency.”

### 2 ETSO-C142a#1 NON-RECHARGEABLE LITHIUM CELLS AND BATTERIES

#### 2.1 Summary of Deviation

Deviates from ETSO-C142a by using revision A of RTCA DO-227.

#### 2.2 Original Requirement

##### 3.1.1 - Minimum Performance Standard

*RTCA DO-227 “Minimum Operational Performance Standard for Lithium Batteries” from June 1995 unless otherwise specified by Appendix 1 of this ETSO*

##### 3.1.2 - Environmental Standard

*Non-Rechargeable Lithium Cells and Batteries must be tested according to RTCA DO-227 Section 2.3 unless otherwise specified by Appendix 1 of this ETSO*

#### 2.3 Industry

EASA advertised their intent to recognize the use of RTCA DO-227A in place of the current RTCA DO-227, which should be the MPS for the future ETSO-C142b. Until ETSO-C142b is published, the industry needs to get batteries and end-items approved in accordance with DO-227A. EASA is granting credit for this new version of DO-227A to show compliance to the applicable special conditions at installation level. FAA is following the same approach.

## 2.4 Equivalent Level of Safety

An equivalent level of safety is provided by using the latest version of RTCA DO-227A, which incorporates more stringent tests than those required by the DO-227 and the appendix 1 of ETSO-C142a, in particular than the tests for fire safety requirements in table 2 of Appendix 1.

## 2.5 EASA position

We accept the deviation.