European Union Aviation Safety Agency

FAQ n.136740

FAQs:

Instructions for Continued Airworthiness (ICA), Initial Airworthiness, Regulations

Question:

Does point 21.A.90C(c) imply that we may encounter non-ALS changes which can be minor with/without additional work to demonstrate compliance and major? Should a TCH process start with the identification of the affected requirements, to determine, for non-ALS ICA changes, if they can take benefit of point 21.A.90C(c)?

Answer:

In general, type certificate changes can be minor without showing of compliance, minor with showing of compliance and major.

For non-ALS ICA changes, the GM1 21.A.90C is proposing a different perspective on how the stand-alone changes have to be considered:
'[...] Stand-alone changes are usually straightforward changes, and are not considered to require additional work in order to show compliance. However, they must be managed in accordance with a process accepted by EASA under point 21.A.239 or point 21.A.14(b), for discharging the obligation to keep the ICA up to date and to cover aspects like preparation/verification/release in accordance with their respective AMC/GM material.

Examples of changes that may require additional activities in order to show compliance are changes to the CDCCL, and EWIS ICA.'

Also, App. A to GM 21.A.91, section 10, is listing cases where compliance needs to be demonstrated (in this respect, the section contains examples of **major changes**).

The TCH process may document this kind of approach - i.e. a list of examples of stand-alone changes which require additional compliance demonstration as either major or minor. When a change is within the list, a classification on airworthiness criteria should be performed (with the identification of applicable requirements).

Last updated:

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Link: