

FAQs: Initial Airworthiness, Regulations

Question:

From 18 May 2022, a new requirement 21.A.307 becomes applicable (refer to Regulation (EU) 2021/699). This means that certain new parts do not require an EASA Form 1 for installation during maintenance. What are the implications of these regulatory changes, especially for General Aviation? Are 'standard parts' and 'owner-accepted-parts (former 21.A.307(c)-parts') impacted?

Answer:

In essence, two new categories of new parts will be permitted to be installed during maintenance of European registered aircraft without the parts being accompanied with an EASA Form 1, but with an alternative document instead:

- parts with negligible safety effect as identified by the holder of the design approval (according to 21.A.307(b)3);
- parts with negligible safety effect as identified by EASA in CS-STAN for standard changes/repairs (according to 21.A.307(b)4)

This will permit fabrication of the above parts by organisations which are not approved as productions organisations (POA), which was considered too stringent for the manufacturing of parts having negligible safety impact in case of non-conformities.

Note that already for years, and after the new regulatory change will become applicable, 'standard parts' (parts i.a.w. 21.A.307(b)1) and 'owner-accepted-parts' (parts i.a.w. 21.A.307(b)2) are not required to be accompanied with an EASA Form 1 when they fulfil certain conditions.

For all the above-mentioned parts, as an alternative to the EASA Form 1, the rule requires a manufactured-issued document accompanying the part (for instance a certificate of conformity) to properly identify the part and trace it to the original manufacturer (refer to the new 21.A.307(c) for details). In respect of 'standard parts', this requirement is fulfilled with a 'dated delivery-note' from the manufacturer stating the name and the part-number (and the parts being engraved with that number). For parts obtained through a part's dealer, the dealer can add a scanned copy of the dated delivery note (or equivalent) from the manufacturer on the shipment of the parts. This also applies to 'owner-accepted-parts'.

Finally, note that the regulatory amendment excludes the need for 'EPA' marking (see new point 21.A.804(a)3) for all the above-mentioned parts, and that the requirements applicable for the maintenance of these parts are also alleviated as established in M.A.502 (d) and (e) and ML.A.502 (a) and (c) of regulation (EU) 2021/700.

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Link:

https://www.easa.europa.eu/fi/faq/136280