

# Initial Presentation of Regulatory Candidate Issue Papers (CIPs)

EASA CIPs

Presented by :

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# EASA Candidate Issue Papers to be discussed

- CIP EASA 2023-01: Removal of the reference to “User’s Guide”
- CIP EASA 2023-02: Analysis/approval only for mature/frozen design
- CIP EASA 2023-03: IMPS Appendix 4 [List of Abbreviations and Glossary of Terms] Clean-up
- CIP EASA 2023-04: Clarifications on the policy of “off-wing”, overhaul and restoration tasks
- CIP EASA 2023-05: Wrong incorporation of IMRBPB IP 65 in MSG-3
- CIP EASA 2023-06: Remove reference to "Letter Checks" in MSG-3
- CIP EASA 2023-07: SSI definition update in MSG-3
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# CIP EASA 2023-01 - Removal of the reference to “User’s Guide”

→ CIP applicability: MSG-3 Vol.1 and Vol.2

→ Current MSG-3 both Volumes refer to an "User's Guide" as alternative to a PPH.

→ Paragraph 2-1-2.3

Assumptions made during the analysis, that can result in a change to the analysis, are to be recorded.

- Assumptions applying to the program as a whole, and not only to an individual MSG-3 analysis, are to be documented in the appropriate "Policy and Procedures Handbook" or "User's Guide." As a minimum, this applies to statements concerning anticipated average annual utilization, the

→ Paragraph 2-3-6.5

- The operational consideration shall be limited to the immediate consequences on the operation of the aircraft experiencing the double failure during certificated operations, e.g. cancellation of flight, aborted take-off, return-to-base, diversion. No consideration shall be given to:
  - the consequence on the infrastructure in which the aircraft operates, e.g. the impact of disruptions to the airport and airspace,
  - the subsequent disruption to the schedule, e.g. the impact of rescheduling or accommodating passengers overnight
  - a specific type of operation e.g. perishable goods as cargo,
  - the availability of repair capability or impact of sending parts and workforce to a remote airport (unless otherwise specified in the applicable Policy and Procedures Handbook or User's Guide).

→ The IMPS (Issue 02) does not refer to “User’s Guide”

→ CIP goal: to align MSG-3 to current IMPS terminology

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## CIP EASA 2023-02 - Analysis/approval only for mature/frozen design

- CIP applicability: IMPS
- Experience shows manufacturers stretch the concept of possibility to use assumptions in the analysis, proceeding with approvals of tasks pertaining to systems/structure not yet mature/frozen from a design point of view.
- When this concerns an MRBR revision, the MRBR approval date targeted by the TCH can be set prior to the TC approval date of the concerned design.
  - risk that an MRBR is approved and published not reflecting the latest type design
- CIP goal: to amend IMPS in order to address the need of properly consider and track the maturity status of design

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# CIP EASA 2023-03 - IMPS Appendix 4 Clean-up

→ CIP applicability: IMPS

→ IMPS Issue 02 Appendix 4 “List of abbreviations and glossary of terms” provides the definition of SSI:

**Structural Significant Item (SSI)**

Any detail, element, or assembly that contributes significantly to carrying flight, ground, pressure, or control loads, and whose failure could affect the structural integrity necessary for the safety of the aircraft.

→ This SSI definition is in line with MSG-3 Vol.1 definition **but not with MSG-3 Vol.2 definition** :

**Structural Significant Item - (SSI)**

Any detail, element or assembly, which contributes significantly to carrying flight, ground, pressure or control loads or external load, and whose failure could affect the structural integrity necessary for the safety of the aircraft and/or might cause serious or fatal injury to human occupants.

NOTE: the term “human occupants” includes people supported by external load carrying systems (i.e. hoist/cargo hook etc).

→ Furthermore, IMPS Appendix 4 needs a deep revision (some abbreviations to be added, some to be removed)

→ CIP goal: to harmonize and clean-up IMPS Appendix 4

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# CIP EASA 2023-04 - Clarifications on the policy of “off-wing”, overhaul and restoration tasks

- CIP applicability: MSG-3 Vol.1 and Vol.2
- Task consolidation is explained in MSG-3 paragraph 2-3-7.9
  - However the paragraph is closed with the following statement:

This paragraph applies to on-aircraft tasks only. Descriptions for off-aircraft restoration tasks may identify different task types.
- Room for interpretation resulting in several different approaches by different manufacturers
- Issues at the level of operators and their regulatory authorities due to misalignment with the according ICA (e.g. CMMs) and maintenance documentation
- CIP goal: to add clarifications in the applicability criteria for RST tasks, as well as to introduce the definition of “overhaul” in the MSG-3 glossary

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# CIP EASA 2023-05 - Wrong incorporation of IMRBPB IP 65 in MSG-3

→ CIP applicability: MSG-3 Vol.1 and Vol.2

→ The IMRBPB IP 65 (approved at IAM 2004) recommended the following for implementation:

## 2-5-1. Procedure

The following procedures may be used

- e. Identify zones that both contain electrical wiring and have potential for combustible material being present. For those zones, perform an enhanced zonal analysis that permits the identification of stand-alone inspection tasks that allow appropriate attention to be given to deterioration of installed wiring and electrical wiring interconnection system (EWIS), in particular for wiring in close proximity (i.e., within 2 inches or 50mm) to both primary and back-up hydraulic, mechanical, or electrical flight controls and tasks that minimize contamination by combustible materials if applicable and effective. Rating tables addressing the potential effects of fire caused by a wiring/EWIS failure on adjacent wiring and systems (e.g. the risk to aircraft controllability of a fire), the size of the zone and the density of installed equipment may be used to determine the

→ The following has been implemented instead:

policy. Rating tables addressing the potential effects of fire caused by a wiring/EWIS failure on adjacent wiring and systems (e.g., the risk to aircraft controllability), the size of the zone and the density of installed equipment may be used to determine the inspection level. General Visual

→ The approved recommendation has to be implemented in MSG-3

→ CIP goal: to rectify the wrong incorporation of IP 65

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# CIP EASA 2023-06 - Remove reference to "Letter Checks" in MSG-3

- CIP applicability: MSG-3 Vol.1 and Vol.2
- The IMRBPB IP 10 “*Check interval policy*” (originally discussed in 1996, rev.1 approved at IAM 2003) implementation in the MSG-3 document resulted in the reference to “letter checks” in the paragraph 2-3-8.3:

## 3. Task Interval Parameters

As a matter of convenience, usage of letter checks for individual tasks and the establishment of a check interval framework may be considered by the ISC; e.g., if no predominant usage parameter can be identified.

- The use of letter checks in new MRBRs/MTBRs is not supported by the authorities since long time
- MSG-3 Vol.1 and Vol.2 still have multiple references to “Letter Checks” throughout the document
- CIP goal: to remove the possibility of using letter checks to determine tasks intervals for new projects

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# CIP EASA 2023-07 - SSI definition update in MSG-3

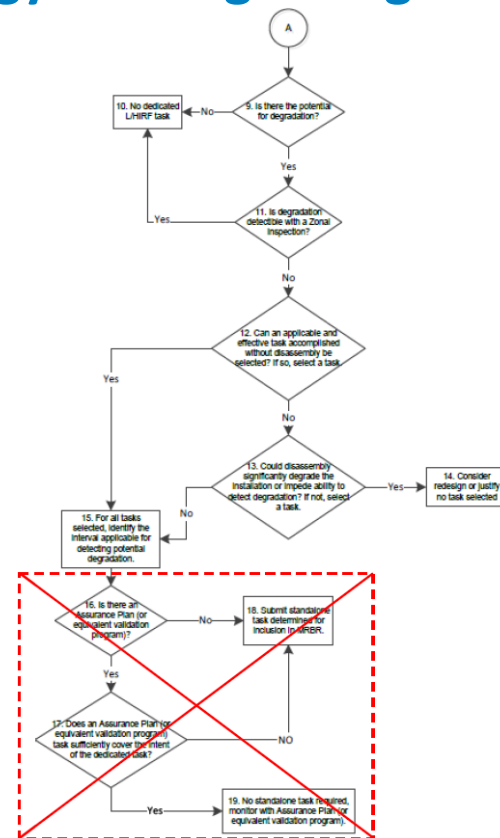
- CIP applicability: MSG-3 Vol.1 and Vol.2
- The definition of Structural Significant Item (SSI) in MSG-3 differs from Volume 1 to Volume 2
  - Vol.1      Any detail, element, or assembly that contributes significantly to carrying flight, ground, pressure, or control loads, and whose failure could affect the structural integrity necessary for the safety of the aircraft.
  - Vol.2      Any detail, element or assembly, which contributes significantly to carrying flight, ground, pressure or control loads or external load, and whose failure could affect the structural integrity necessary for the safety of the aircraft and/or might cause serious or fatal injury to human occupants.  
  
NOTE: the term “human occupants” includes people supported by external load carrying systems (i.e. hoist/cargo hook etc).
- The SSI definition currently in Vol.2 has been implemented following the recommendation of the IMRBPB IP 147 (approved at IAM 2015), applicable to Vol.2 only
- It seems that the recommendations of IP 147 are partially applicable also to fixed wing aircraft for which “*serious or fatal injury to human occupants*” should have also been considered in the SSI definition
- CIP goal: to align SSI definitions in MSG-3 Vol.1 and Vol.2

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# CIP EASA 2023-08 - Removal of not MSG-3 related Steps from the L/HIRF Protection Analysis Methodology and Logic Diagram

- CIP applicability: MSG-3 Vol.1 and Vol.2, IMPS
- The MSG-3 analysis workflow related to L/HIRF shows that the analysis can be considered completed with Step 15: *“For all tasks selected, identify the interval applicable for detecting potential degradation”*
- The following steps are describing a process that is not dependent upon the MSG-3 methodology
- The IMPS can be amended to provide guidelines regarding the possible impact of having a L/HIRF assurance program
- CIP goal: to remove L/HIRF Assurance Program related steps and diagram from MSG-3, and update IMPS accordingly



# Thank you for your attention!



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