

EASA response to industry feedback including improvement actions

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EASA Response to Industry Feedback

- Sources of Feedback
- Analysis of Feedback
- Improvement Actions



Certification Conference

October 24, 2023
Cologne

Sources of Feedback



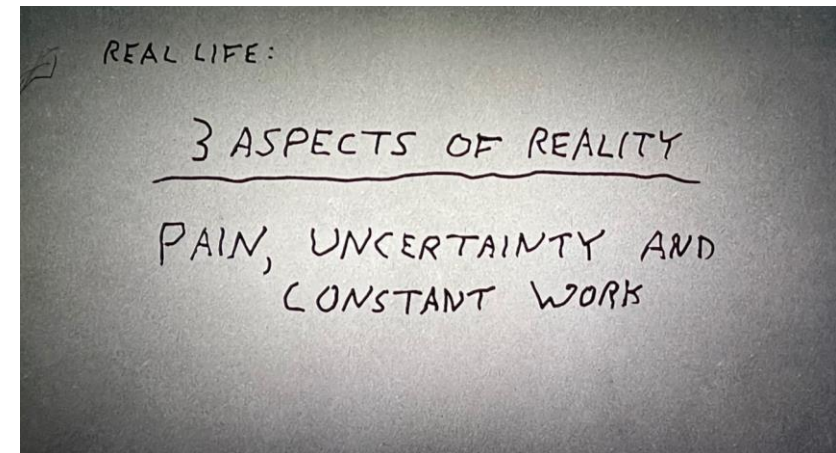
Sources of Feedback

1) Stakeholder Survey 2022

2) Certification Conference 2022 – Working with EASA Session

1) APTOZ in relation to STCs using feedback collected from DM.TEC (a group of the Stakeholders Advisory Body) and the SME DOA Alliance

2) Lufthansa Technik in relation to DOA





Stakeholder Survey 2022

214 Responses



Overall satisfied and in some cases very satisfied with our services

General Statement

Application process & the applicant portal straightforward and easy to use.



Stakeholder Survey 2022 Highlights



WORKING WELL?

74% are satisfied with the resolution of disagreements and the escalation process.

86% find our technical competences adequate and the same goes for the transparency of technical aspects related to certification.

77% find our certification teams adequately competent and proportionate.

86% find our Certification basis and means of compliance clear.

80% found that the industry standards, when relevant are taken into account as Means of Compliance with the requirements.

95% are confident with the protection of confidential/proprietary data by EASA

73% are satisfied with the level of support provided for foreign Authority validation.

80% are satisfied with our DOA oversight.

70% are satisfied with the Part 21 Rulemaking process related to certification of design and approved organization

85% are satisfied with the extent of the privileges offered by the Part 21 DOA requirements.

74% find the privileges workable and easy to implement.





Stakeholder Survey 2022 Highlights



NEEDS IMPROVEMENT



42% are not satisfied with the implementation of the LOI requirements.

40% expressed concerns regarding the timeliness and predictability of the certification process and did not feel well informed on their project progress status.



36% are unsatisfied with SEPIAC

30% are not satisfied with the communication throughout the project and found that our justification of a technical decision was unclear and lacking transparency.

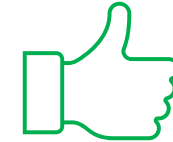




APTOZ – Reminder

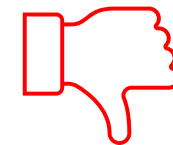
Well done

- Covid-19 special conditions and GM
- Easy access regulations
- EASA staff are easily approachable for questions, a quick phone call or advice
- Certification Memoranda



Improvement

- Assignment of resources
- Spread of Guidance Material
- DOA lack of involvement in industry groups
- Availability of Special Conditions and their updates





Lufthansa – Reminder

General Observations



- EASA guidance and opinions
 - Distribution of information/guidance is moving towards FAQs
- Introduction of regulatory changes
 - Information provided becoming more sparse
 - Delayed information (release of AMC/GM)
- EASA resources



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Analysis of Feedback

Analysis of Feedback



LOI including Performance ratings

- Consistency of feedback.
- Level of understanding within DOAs.
- Frequency & Availability of data.
- Bringing Complexity.

Rulemaking and Guidance

- More training needed to support regulation updates.
- Part 21 requirements should remain more stable.
- AMC/GM sometimes coming too late
- Guidance is too spread out – AMC / GM / CM / FAQ
- Access to Special Conditions
- Visibility of what is in work.

Predictability including Resources

- Lack of clear planning on timelines.
- Long response times / Delays in process / availability.
- Lack of transparency in communication.
- Assignment of team not based upon availability.
- SEPIAC usage not standardised.
- Lack of standardisation of experts.
- PCM acts as coordinator only rather than Certification Manager.
- No clear escalation path for DOA team

Proportionality - Small Organisations

- Lack of small DOA involvement in industry groups.
- Too many new requirements in short time period.
- Process focused on large OEM.

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Improvement Actions



EASA

European Union Aviation Safety Agency



LOI including Performance ratings

Improvement actions



- Clear guidance and internal training for EASA Staff.



Consistency of feedback.



- DOA TL available to provide details as required to DOA.
- Run Workshop on LOI.



Level of understanding within DOAs.



- Internal automated tracking of EASA Feedback.
- Implement yearly project feedback for long term projects.



Frequency & Availability of data.



- DOA TL and PCM to work with DO where process shown to be problematic.
- Review CM on LOI if still up to date.



Bringing Complexity.





LOI including Performance ratings

Reminder - LOI Determination

Applicants **proposal** and justification per CDI for



If EASA do not agree with the proposal

- EASA to **determine**, record, explain and notify the changed values from EASA perspective

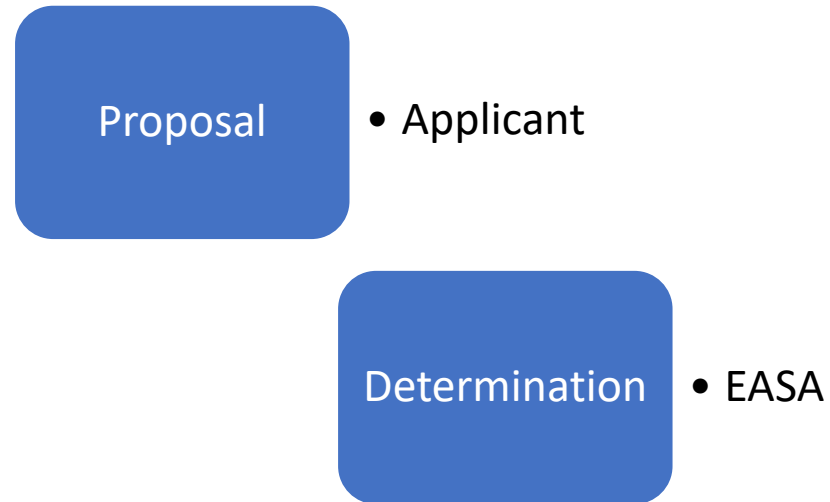




LOI including Performance ratings

Reminder - LOI Determination

There are only 2 steps:



This is a fixed process for speed and efficiency

Happy to
explain the
determination





Predictability including Resources

Improvement



- Increase Resources



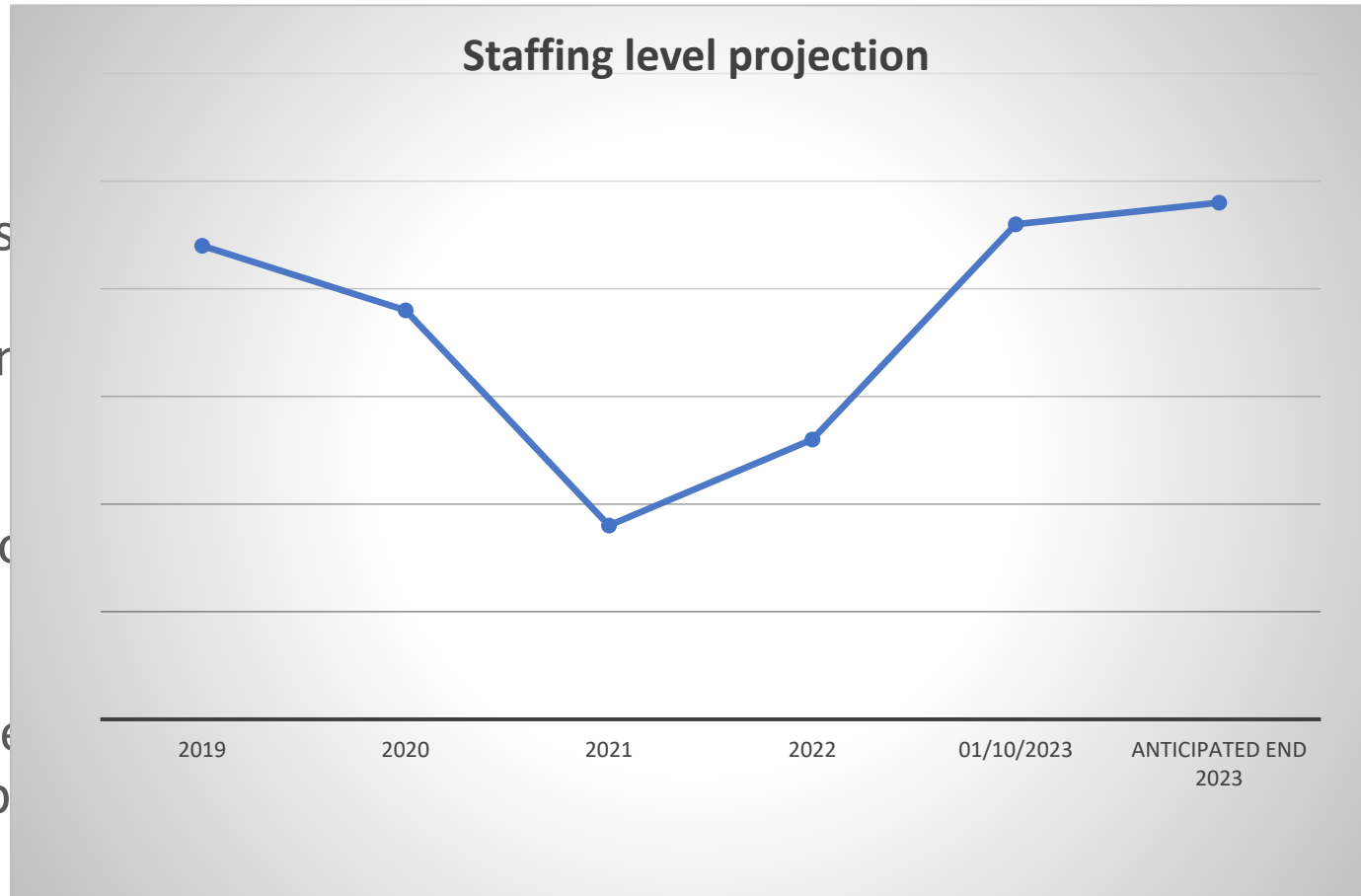
- Internal Staffing & Experts



- Escalation coordination



- IAW improved to address problems



delays in process / availability.

communication.
used.
of experts.

for DOA teams.

timelines.
based upon availability.
only rather than
used.



Proportionality – Small organisations

Improvement actions



- ✓ Restructuring of SAB (Stakeholders Advisory Body) allows for more interactions from small organisations.
- ✓ Continuing to seek feedback from groups involving Small and Medium DOAs such as IAMA.

Lack of small DOA involvement in industry groups.



- ⌚ Slow down in Part 21 evolutions is anticipated.

Too many new requirements in short time period.



- ✓ Initiatives such as Part 21 Light are aimed at other segments
- ✓ Restructuring of SAB allows for more interactions from small organisations.
- ✓ Continuing to seek feedback from groups involving Small and Medium DOA such as IAMA.

Process focused on large OEM.



Rulemaking and Guidance

Improvement actions



- Systematic implementation plans to be provisioned including sessions to inform stakeholders.
- Other communication means to be explored.

More training needed to support regulation updates.



- Noted; Slow down in Part 21 evolutions is anticipated.

Part 21 requirements should remain more stable.



- Target is to make AMC & GM at time we change IR or shortly after.

AMC/GM sometimes coming too late



- Review ongoing to identify FAQ & CM that have already been incorporated AMC & GM

Guidance is too spread out – AMC / GM / CM / FAQ



- All Special Conditions are available on our website, however not always easy to find.
- New interface being developed to more easily find relevant Special Conditions

Access to Special Conditions.



- Plan to publish list of material that is anticipated to be amended and ultimately published

Visibility of what is in work.



Rulemaking and Guidance

Guidance is too spread out – AMC / GM / CM / FAQ

- FAQs should clarify existing material only, but should not implement additional Means of Compliance or Interpretative Material.
If you identify the opposite, please inform EASA via the EASA website [“Contact us”](#)
- When an FAQ is covered by later CS, AMC/GM, CM updates, the FAQ is planned to be deleted.





Rulemaking and Guidance

Certification Memoranda (CM) clarifications

- To provide guidance on a particular subject and may provide complementary information and guidance for compliance demonstration with current CS.
- Not intended to introduce new certification requirements or to modify existing CS and do not constitute any legal obligation.
- To provide early awareness and should reduce discussions during certification projects. Content of IM and MoC CRIs that are of public interest and without proprietary data are planned to be published via CMs. List of future CMs in the order or priority will be published.
- When an AMC/GM rulemaking task covers CM topics and the CM is considered as mature, the content is transferred into AMC/GM





Rulemaking and Guidance

Publication and Consultation of certification requirements and guidance

EASA website is going to be improved with new filters

[Link to EASA website for published SC, ESF, DEV, ETSO-DEV, CM, IM, MoC](#)

Initiated improved filters

Related certifiable products

1. CS-22 Sailplanes and Powered Sailplanes
2. CS-LSA (Light Sport Aeroplanes)
3. CS-23 Aeroplanes (CS-VLA is merged with CS-23 amdt5)
4. CS-25 Large Aeroplanes
5. ...

Affected Primary Technical Domain

1. Flight and Human Factors
2. OSD-Flight Crew
3. ...

Consultation/Publication type

1. Special Condition (SC)
2. Equivalent Safety Finding (ESF)
3. Deviation (DEV)
4. ETSO Deviation
5. Certification Memoranda (CM) Cat. 1
6. Certification Memoranda (CM) Cat. 2
7. Interpretative Material/
Means of Compliance to SC



And.... SEPIAC

Improvement actions



- SEPIAC continues to be developed.



Some comments were made in the Survey relating to;

Specific Functionalities.



- Internal training at EASA provided on functionalities and best practices.
- Workshop organised for applicants.



More training on functionalities and best practices for Expert and Applicants.



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Thank you!