

Business Jets Workshop 2025



21st – 22nd January 2025

EASA Headquarters

Cologne, Germany

#easabusinessjets

Upcoming Reg Updates

New OSD rules published by ANAC

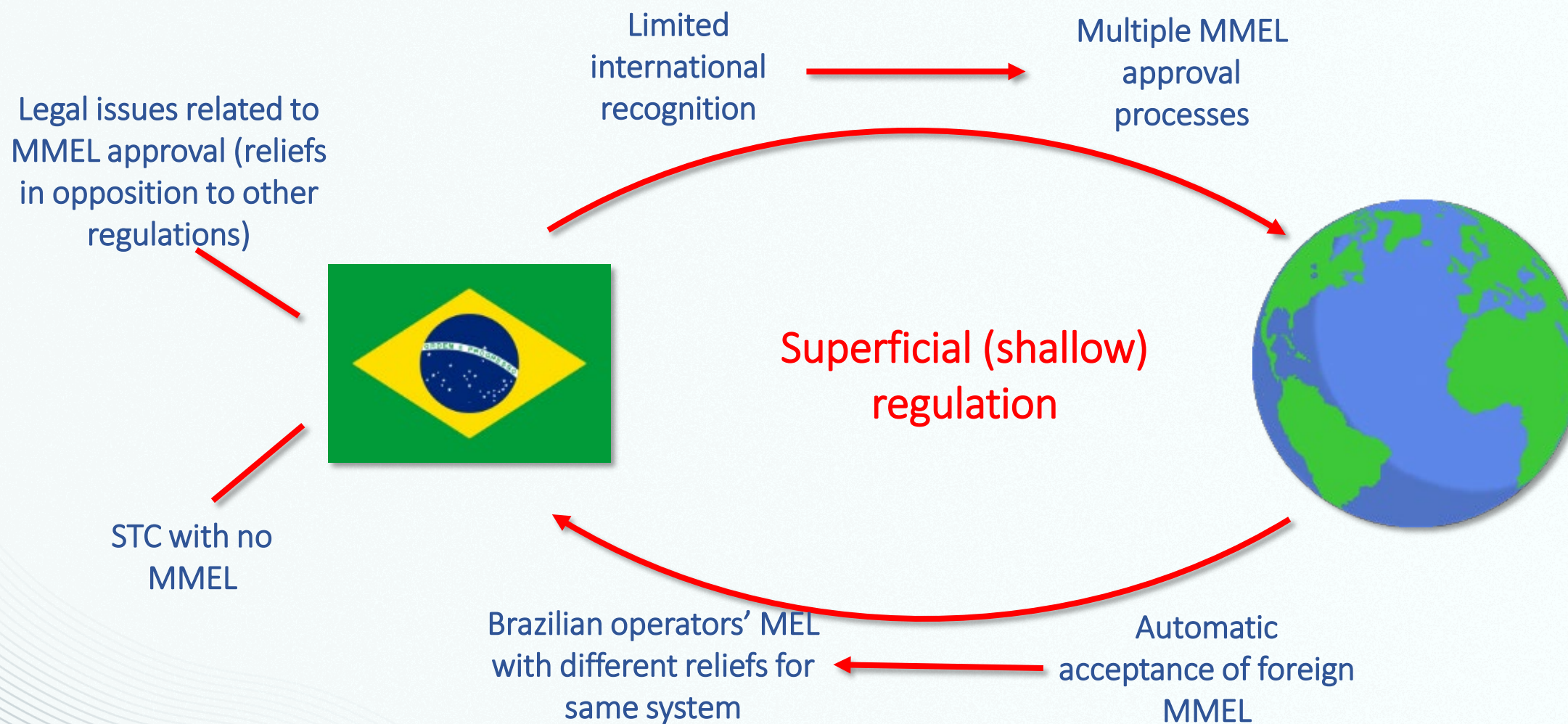
Willer Cruz

Manager, Flight Engineering Technical Branch

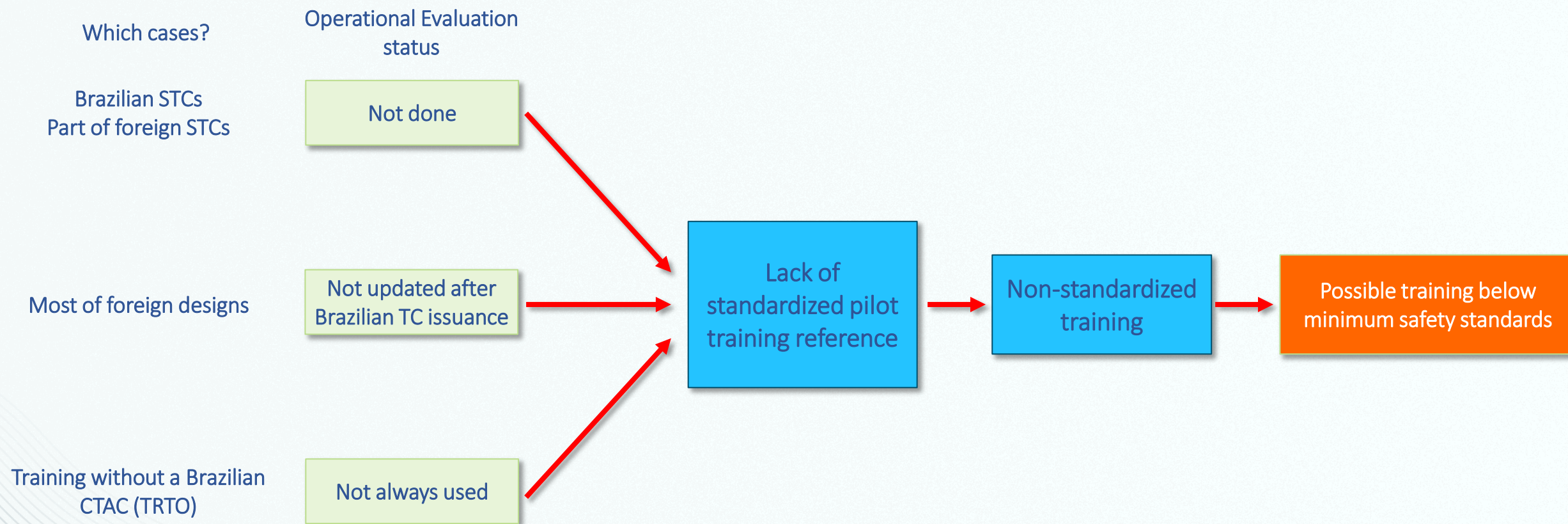
Why change?

Regulatory Impact Assessment (RIA) and Public Consultation

Regulatory Issues – MMEL



Regulatory Issues – Operational Evaluation



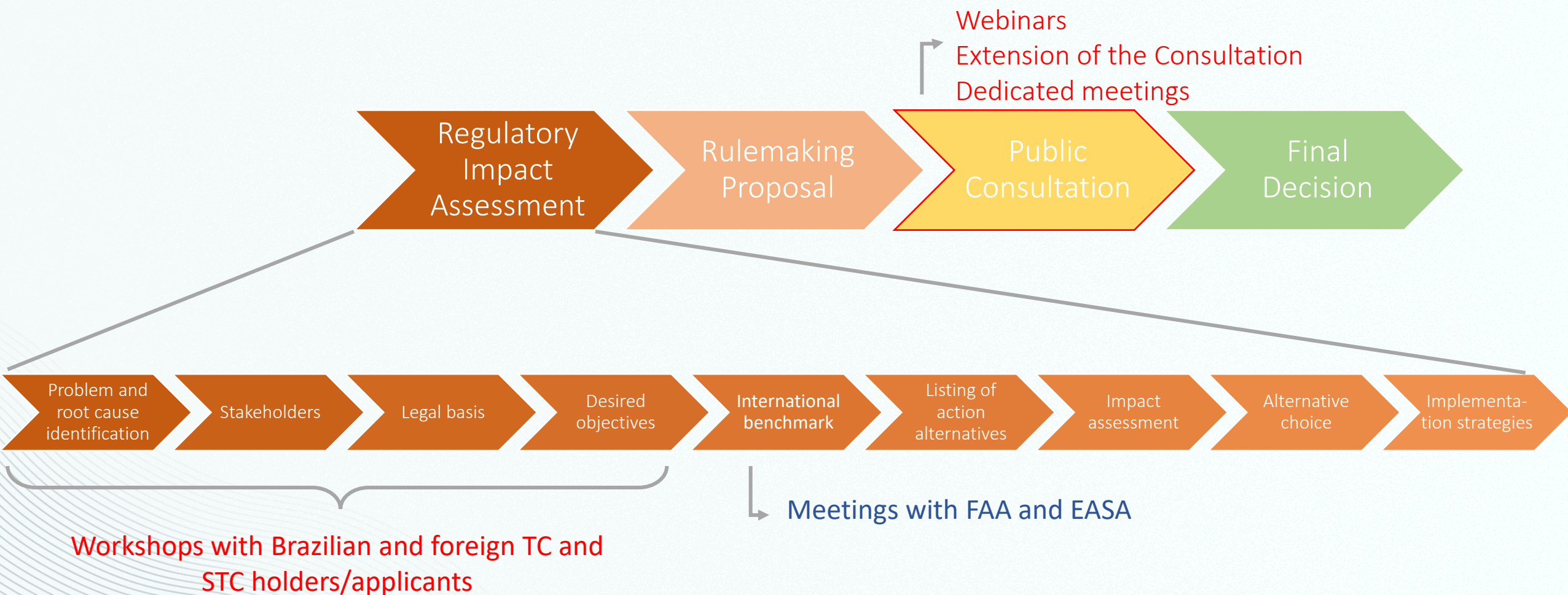
CTAC – Civil Aviation Training Center
TRTO – Type Rating Training Organization

* In most situations, the Operational Evaluation Report was used as a good practice by the ANAC technical branch, but existing regulations did not cover, or covered only partially, such use.

Normative Process

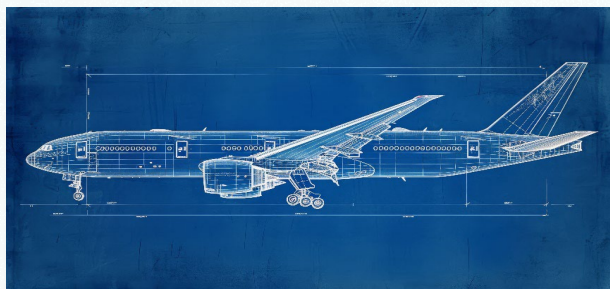
Regulatory Agenda Theme:

Type Design Data with Relevant Effects to the Operational Context

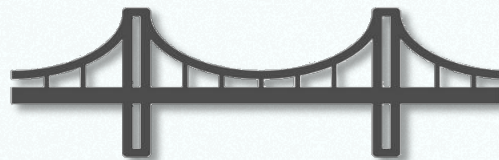


What has changed?

Operational Suitability Data (OSD) Concept



Type Certification

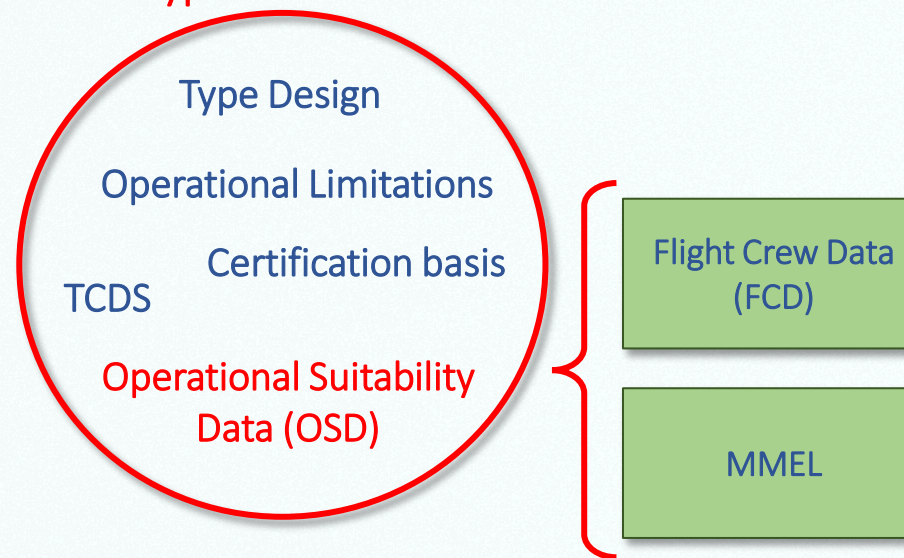


OSD



Operations

Type Certificate



Chosen Alternative after Public Consultation

Aspect	A4.1	Improvement Package included in TC
Type Certificate	✓	OSD is part of TC
Operational Evaluation	✓	Voluntary / use as a reference
Certification Basis	✗	No specific amdt. / current requirements always apply
Design Organization Certification (COPj / DOA)	✓	COPj / DOA privileges apply to OSD
Data Ownership	✓	MMEL: certificate holder
	✗	FCD: ANAC

Flexible requirement:

- Data ownership is not specified in regulations
- IS (GM) may evolve and allow ownership by the certif. holder

Summary of Changes

RBAC 21

21.29 – TC Validation

OSD approval for type validation

21.41 – Type Certificate

Inclusion of OSD

21.61 – OSD **NEW**

(a) FCD – voluntary

(e) MMEL – mandatory depending on the size of aircraft

(f) Availability of OSD

21.107 – Changes to OSD **NEW**

(a) Applicant **MUST** demonstrate that the OSD remains valid OR update the OSD;

(b) IF not demonstrated, ANAC may limit OSD.

(c), (d), (e), (f) Classification and Approval of Changes to OSD

21.263 – Privileges – Design Org.
Classification and approval of changes to OSDs

RBAC 01

MEL Definition **UPDATED**

MMEL Definition **UPDATED**

OSD Definition **NEW**

RBAC 61

Better link between Operational Evaluation and type rating training/limitations

RBAC 90

OSD acronym update

RBAC 21 amdt. 11 published on 16/APR/2024, Effective on 02/JAN/2025

What are the impacts to Supplementary Instructions (IS)?

Note: An ANAC Supplementary Instruction is the equivalent of:

- FAA Advisory Circular
- EASA Interpretative Material / Means of Compliance

Mixed Study Group for IS Revisions



- Mixed Study Group conducted in 2024 helped ANAC to identify the perspective of the industry on the theme.
- New Supplementary Instructions published in Dec/2024:



IS 21.61-001A FCD



IS 21.61-005A MMEL

Conclusion

Conclusion: Main Takeaways

- **FCD:**
 - Remains voluntary for new TCs.
 - If there is a Brazilian FCD, it must be kept updated with design changes.
- **MMEL:**
 - Required for large aircraft (MTOW > 5,670kg / 12,500lb).
 - Streamlined acceptability for EASA and FAA MMELs.
 - Specific ANAC policies may apply for MEL acceptance of Brazilian operators.
 - STCs impacting MMEL of the aircraft require specific evaluation.

Thank you. Any Questions?



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