

MINUTES OF MEETING

Subject SAB C.COM meeting (1/2021)
Date 3 March 9:30-16:45
Location Teleconference (Webex)

Organised by Certification Directorate

List of Participants

Attendees	<p>C.COM members/alternates: François DUCLOS, Gilles GARROUSTE (from 10:30), Eric PARELON, Belinda SWAIN, Francesco PISANTI, Uwe SCHUELER, Markus GOERNEMANN, Alain LEROY, Dominique ROLAND, Xavier VERGEZ</p> <p>Other participants from EASA: Anne SENECHAL, Eric DUVIVIER, Julian HALL, Grégory LIEVRE, Rodrigo PRIEGO, Youri AUROQUE, Jean-Pierre ARNAUD, Rachel DAESCHLER, Ludovic ARON, Olivier TRIBOUT</p> <p>Other participants from the industry: Cyrille MARCHAND (Thales), Gilles Fontaine (Airbus)</p>
Apologies	N/A

AGENDA

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MoM prepared by	Xavier VERGEZ (C.COM Secretary)	Date 15.3.2021
MoM endorsed by	François DUCLOS (C.COM Chairman)	Date 12.4.2021

1. Opening and Welcome

The meeting was held via Webex teleconference and started at 9:30am.

The Chair François Duclos welcomed the participants.

Dominique Roland, HoD CT.5 since 1 January 2021, introduced himself and highlighted the main organisational changes done in the EASA CT Directorate in the frame of the re-organisation which entered into force on 1 January 2021 (so called 'CT Adjust 2021').

- Approval of the agenda:

The agenda was approved without change.

- C.COM membership:

Uwe Schueler joined the C.COM recently, representing Lufthansa Technik. The nomination of an alternate member to Uwe is considered but the candidate has not yet been identified in A4E.

Regarding the potential to add a member from the smaller end of the industry (mentioned at last meeting), this will be discussed in the frame of the SAB taskforce discussing the membership in relation to the AB re-organisation.

The industry will come back later with a proposal for the above two points.

2. Abstraction layer

Presented by: EASA (Eric Duvivier, Anne Sénéchal), and Industry (Cyrille Marchand)

A joined EASA-industry presentation was performed to present the status of the actions of the AL task force.

EASA first reminded the background of the taskforce. Three tasks have been defined, and their status of progress was provided as follows:

Task 1 (T1) -Develop criteria for evaluating a standard or methodology that could be used for the approval of Software and Airborne Electronic Hardware

➔ completed at 95%.

Task 2 (T2) Identify standards or methodologies that could be evaluated (against the criteria defined in 1) as potential alternatives

➔ completed at 100%.

Task 3 (T3) Highlight any recommendations to improve upon the concepts identified in DO-178 and DO-254

➔ very limited progress at this stage, some work is scheduled in March, completion expected by end of June.

Plenary meetings are planned until the end of March. Sub-groups meetings also take place in between, the schedule is considered tight.

EASA also presented an overview of the criteria repository describing the definitions of each criterion (task 1).

Regarding the FAA participation, it is considered good and well supportive.

Task force report target: by end of June 2021. The target is considered on track. Industry insisted to work also in parallel on a strategy defining the way the results of the taskforce will be translated in rulemaking.

The results of the taskforce are planned to be shared at the next COB with the FAA and CMT meetings.

This topic will be followed up at the next C.COM during which the recommendations proposed by the task force will be reviewed.



3. SMS (RMT.0251)

Presented by: Industry (Gilles Fontaine (Airbus)) and EASA (Rodrigo Priego, Youri Auroque, Jean Pierre Arnaud)

Gilles Fontaine represents the ASD as SMSco-leader for the update of the SMS international Standard (SM-0001).

On EASA side: the new colleagues in charge of the Part 21 part of the project were introduced: Rodrigo Priego and Youri Auroque.

Presentation by industry (ASD):

Many comments from the industry have been taken on board. But some comments not, e.g. concerning the AltMoC provision which is maintained in the Opinion (for POA and MOA).

AMC/GM: Generally considered too prescriptive. Industry would like to further collaborate to work on the new shape of the AMC/GM to Part 21 and Part 145.

SMS International standard update: Kick-Off Meeting in Nov 2020 with industry and authorities of the CMT. Schedule: draft Issue B in July 2021, ballot through AIA, AIAB, AIAC, ASD and GAMA member companies in Q3/2021, validation by SC Q4/2021, Publication Q1/2022 together with AMC/GM to Part 21 and Part 145.

Update work is ongoing with the following objectives:

- Onboard lessons learnt from first implementations
- Consider feedback from Authorities
- Add some specifics/examples for scalability, maintenance organisations and SMS maturity assessment
- Remove EASA “additional topics” from Part 21 draft AMC to accept SM-0001 as standalone Means of Compliance with SMS requirements, and, after review and agreement, incorporation in the industry standard of the topics which are specific to the SMS

Presentation by EASA:

The first presentation of Opinion 04/2020 to the EASA Committee & Experts Group was delivered last week: positive feedback from various Member States. The European Commission is now going to get the document ready for the MS's vote, possibly in June 2021. Adoption of regulation amending Part 21 might be expected Q4/2021.

EASA underlined that best effort should be made to ensure that regulatory material is aligned for organisations holding two approvals (DOA, Part 145). The aim is to ensure consistent regulatory provisions applicable to both types of approval. In addition, small organisations appreciate AMC/GM to have a sufficient level of details to understand what is needed in terms of implementation.

EASA reminded the way forward method:

- To consider the criticality of the comments, a working matrix has been made to separate controversial and non-controversial AMC/GM items.
- For Part 21, 5 working groups have been made to address the controversial items, as grouped, with the following timelines:
 - Q2 and Q3/2021: Webex meetings on the review of the controversial items.
 - Q4/2021 (or when appropriate): FCGs final desktop review of AMC/GMs.
 - Q1/2022: Publication of ED Decision (AMC/GM).

Industry (François) mentioned that our aim should be to work so that controversial items become non-controversial in the end. A status should be reviewed at the next C.COM meeting to identify what is missing to converge.

Industry (Gilles) asked for clarifications on how ‘non-controversial’ is defined. EASA (Jean-Pierre) reminded the challenge to address 864 NPA-related comments (Part 21) and review 100 AMCs within a 1 year period, so a cut



had to be done, based on the perceived criticality of the received comments. A definition of 'non controversial' can always been challenged; the aim is to timely progress the AMC/GM with confidence and efficiency. If, during the review of the 'non controversial' items, uncertainty, challenges or whatsoever difficulties are felt, EASA will turn to the FCG for support. In addition, for the sake of transparency, a consultation of all the drafted AMC/GM will be planned with the FCG at a point of time as part of the overall project management. This will be the spirit of the work planned in the next months.

A follow up of this topic will be done at the next C.COM meeting.

4. International cooperation update

Presented by: EASA (Grégory Lièvre, Markus Goernemann)

EASA presented an update on the cooperations with the UK and China.

EU-UK BASA:

A BASA agreement applies since 1 Jan 2021.

A TIP negotiation is on going. It could be completed in the next weeks. Target is before end of Q2.

Industry insisted on the importance to meet this target since the situation introduced by the Brexit is new and the manufacturers cannot rely on existing working arrangements as it has been the case with other countries where the TIP was awaited.

First COB meeting as soon as the TIP adoption process has been completed (exact date depending on the negotiation developments).

General FAQ is available on the EASA Website.

China:

The TIP was adopted in September 2020.

The 2nd COB was held in February 2021.

No. 3 Jet fuel: agreement reached on the issue.

Several training/communication were made.

Common FAQs to be published on EASA Website shortly.

At last COB, the following issues were presented:

- Undue delays for the treatment of validation projects,
- Administrative requirements not in line with the TIP.

EASA and CAAC agreed to exchange the status of main validation projects.

Discussion also held to review the existing DOA/POA in China, the participation of EFTA States in the Agreement, production aspects. But no decision has been reached yet.

AOB

Action: EU Industry to provide their priorities on design and production matters at ICAO level. Target date: End April 2021

5. B737 MAX follow up

Presented by: All

Discussion around the US congress publication on 12th January 2021: Aircraft Certification, Safety and Accountability Act (ACSAA).



Presentation by industry (ASD):

EASA-ASD meetings were previously held in April 2020 and July 2020, where ASD presented their analysis of the recommendations made after the investigations of the two 737 MAX accidents, and where some axes of enhancement were discussed and agreed with EASA.

ASD then described their understanding of the recent US congress act (ACSAA) regarding:

1. FAA oversight, delegated authority and workforce,
2. Aircraft design, development and certification (mainly applicable to large transport aeroplanes)

Industry considerations:

1. Significant additional funding will be allocated to FAA to implement the requested actions
2. FAA is requested to retrieve its international leadership
3. When the FAA will implement the ACSAA, the validation activities may be impacted if our current alignment is not maintained. Also, specific design requirements could apply to US registered aeroplanes, and additional certification, operational, oversight requirements could be raised. Industry is concerned by the risk of being impacted by such new requirements.

Industry would like to know:

- how EASA will continue to work on the presiously agreed axes of enhancement, with adequate involvement of industry,
- what could be mirrored by EASA from the ACSAA, in addition to previously identified axes of enhancement.

EASA briefing:

EASA informed the industry on its identified axis of work:

- Work toward a more robust system safety assessment process during certification of large aeroplanes (incl. propulsion system interfaces). This activity will be proposed to be handled in the frame of the CMT/CATA, and Industry will be engaged as per the usual process. A paper will be submitted to the CMTS so as to formalise the tasking to the CMT/CATA. The expected outcome is a harmonized certification policy (no update of certification specifications). EASA leading expert is Emilie Marchais.
- Work on in-service large aeroplanes continuing airworthiness: improve the integration of human factors (HF) and crew training requirements during continuing airworthiness. Review certification assumptions taking into account experience gathered in service. Flight data analysis is considered as a tool that could help supporting this task. This is however not yet mature and ready to share with the CMT. EASA would like first to engage with the European industry (operators and manufacturers). EASA leading expert is Mark Kieft.
- Work on the development assurance: this is being analysed for the time being. EASA leading expert is Nicolas Chevillard.
- Changed product rules: FAA is in the lead for the drafting of the Charter. Regular CMT meetings are on going. EASA recommends an international Authority working group to be created. Industry stakeholders will probably be engaged through their Authority in the first phase. EASA leading expert is Ludovic Aron.

Action: B737 MAX follow up. Focal points to be defined on Industry side for the axis of work identified by EASA .

Additional clarifications brought by EASA on ACSAA consequences:

- Regarding the effort that is requested in the ACSAA to the FAA in terms of gain in expertise and technical competences, EASA stated that it has already protected its field of technical competences.
- EASA will clarify with the FAA what is expected from the manufacturer in the section 105 "Disclosure of safety critical information" in terms of submission of safety critical information.



Until more formal organised way of working with the industry will be set up for the defined axes of enhancement, EASA will start to initiate some of the expected enhancement in the frame of the programs ongoing with the manufacturers.

6. SAB reorganisation

Presented by: All

EASA presented the slides planned for the SAB 2021-01 meeting on 4 March.

The objectives of the SAB re-organisation were reminded (unchanged compared to last year).

Two pilot cases will be run in 2021 (Rotorcraft community and Aerodromes community).

Also the deployment of a new online cooperation platform is planned in 2021.

EASA re-stated that the C.COM is considered useful to EASA. If it is not possible to maintain this group within the AB structure, it may be managed by the CT Directorate. However, membership of C.COM members in a community may also be needed in the future.

7. Review of Opened actions

Presented by: All

A status was made for all opened actions. Please refer to the distributed updated Excel spreadsheet.

8. Industry feedback on the new EASA Certification Directorate organisation

Presented by: Industry and EASA

EASA provided responses to the different question marks that the industry had regarding the way the CT Directorate is organised (CT Adjust 2021) and connected with other EASA Directorates.

9. Briefing to EASA Certification Director Rachel Daeschler

Presented by: François Duclos

François Duclos presented a summary of the discussions of this meeting to Rachel Daeschler.

10. Closure of the meeting and next meetings

The teleconference was closed at around 16:45.

The next C.COM meeting (Webex teleconference) is scheduled on 5 May.

The following dates were agreed for the next meetings after the summer: 7 September and 23 November.

