

**Comment Response Document (CRD)  
to Advance-Notice of Proposed Amendment (A-NPA) 15/2006**

**Consistency of Organisation Approvals (COrA)**

## Explanatory Note

### I. General

1. The purpose of the Advance-Notice of Proposed Amendment (A-NPA), dated 29 September 2006 was to consult stakeholders on the preferred method of implementation of the JAA Consistency of Organisation Approval (COA) report.

### II. Consultation

2. By the closing date of 29 December 2006, the European Aviation Safety Agency (The Agency) had received 15 comments from 14 national authorities, professional organisations and private companies.

### III. Publication of the CRD

3. All comments received have been acknowledged and incorporated into a Comment Response Document (CRD) with the responses of the Agency.
4. In responding to comments, the following standard terminology is used:
  - **Accepted** – The comment is agreed by the Agency and any proposed amendment is wholly transferred to the revised text.
  - **Partially Accepted** – Either the comment is only agreed in part by the Agency, or the comment is agreed by the Agency but any proposed amendment is partially transferred to the revised text.
  - **Noted** – The comment is acknowledged by the Agency but no change to the existing text is considered necessary.
  - **Not Accepted** - The comment or proposed amendment is not shared by the Agency.
5. Any possible reactions of stakeholders regarding possible misunderstandings of the comments received and answers provided should be received by the Agency not later than 06 February 2008 and should be sent by the following link: [CRD@easa.europa.eu](mailto:CRD@easa.europa.eu);

### IV. Result of the consultation

6. The purpose of the A-NPA was to consult stakeholders on the preferred method of implementing the Consistency of Organisation Approval (COA) recommendations. These recommendations were prepared by the JAA COA group to achieve consistency of the Joint Aviation Requirements (JAR's). JAA had introduced the concept of approved organisations in all its regulated fields as an important tool to promote safety. As the JARs had been developed progressively and more or less independently for each field, the regulatory material varied in many aspects. Inconsistencies regarding organisation approvals became apparent while implementing the JARs. The COA group was established for reviewing the JARs and restoring consistency as far as possible. The JAA Committee adopted the final report of the COA group in February/March 2003.
7. The COA report classified the recommendations in short (0-2 years), medium (2-5 years) and long term (5-10 years) recommendations. Short and medium term recommendations address mainly the clarification of wording, the standardisation of forms, the harmonisation of manuals and quality systems. Long term recommendations propose one set of implementation procedures by authorities and a single approval system.
8. The task of implementing these recommendations was transferred to EASA. It was considered that these recommendations remain globally valid even though the regulatory framework had changed. The A-NPA identified three options for implementation:

- (a) Do nothing,
- (b) Review and transfer of the COra short term and medium term recommendations,
- (c) Transfer of the COra long term recommendations.

(a) The do nothing option implied that existing differences in the airworthiness organisation requirements and approval processes remain and no changes following the COra recommendations would be implemented. This would affect the new requirements in the field of air operations and pilot licensing as well as no harmonisation efforts would be made when drafting the implementing rules. By choosing this option the diversity of organisation approval requirements would be extended.

(b) The option of transferring the COra short and medium term recommendations proposed the implementation of applicable COra recommendations in the airworthiness implementing rules and adapting the air operations and pilot licensing rules accordingly. The main objective was seen as harmonising requirements including editorial amendments of manuals and forms as well as changes on the quality system. It was considered that some differences in the approval processes would remain.

(c) The third option, transfer of the COra long term recommendations, proposed the objective of one set of implementation procedures by authorities and a single approval system with variable scope. The implementation choice would lead to one certificate or approval number for multiple approved organisations, whilst maintaining different criteria for approvals. It was outlined that the timeframe for the implementation of the long term recommendations could vary depending on the state of regulation. For areas where implementing rules are currently drafted, namely operations and pilot licensing, the COra recommendations could easily be incorporated in the drafting process. For the field of airworthiness, where implementing rules are already in place, the implementation of the COra recommendations could be accomplished at a later stage. A certain transition period may be taken into account.

9. The majority of stakeholders indicated their preference for the third option, implementation of the COra long term recommendations. A gradual approach is supported, meaning that the recommendations should first be implemented during the drafting of operations and licensing rules. In the field of airworthiness, where legislation already exists, implementation should be addressed by existing rulemaking tasks as listed in the EASA inventory. In this respect, the need of consistent planning is highlighted. A few stakeholders stress that, although supporting option 3, this should not be understood as agreement on changing the airworthiness regulatory structure or adopting the GERT concept in its present shape.
10. One NAA sees the third option as commendable and ultimate goal but thinks that much more effort and consideration is needed, specifically on the single approval and mutual recognition. It therefore supports the short and medium term implementation as it could lead to the desired results much faster.
11. Four NAAs consider the do nothing option as the best way forward. One NAA comments that the context during the transition from JAA to EASA has significantly changed. Implementing the COra recommendation would be another administrative change not necessarily having a safety benefit. In addition, these NAAs express difficulties in foreseeing the consequences on their activities if the COra recommendations are implemented. However, the nature of the comments shows that there may be a misconception of performance based rules and oversight.
12. The COra report introduces the general recommendation of performance related oversight by using industry internal systems. Two NAAs fear that industry internal audit procedures would replace authority oversight. But this has never been the intention. Industry internal audit systems could support the authority oversight function in helping to define a performance based oversight programme by taking into account compliances or finding of such industry systems. It would also allow authorities to better plan their resources and

activities by taking into account the complexity of a certain operation and organisation, the management system established by the company and its privileges.

13. In addition, one authority supports the idea to reduce administrative burden but indicates that the implications on its remit cannot be overlooked at this time. These concerns may be alleviated if the gradual approach of the implementation of COrA recommendation is followed. This allows for a thorough consideration of each change. These changes will be subject to a regulatory impact assessment and public consultation. Furthermore, certain transitional measures could be considered to give stakeholders sufficient time for implementation.

## **V. Conclusion and perspective**

14. Following the majority view of stakeholders, the Agency will start implementing the COrA long term recommendations. They are best summarised by the COrA vision as presented in paragraph 11 of the A-NPA.
15. The Agency will use a gradual approach for harmonising organisation approvals. In a first step, these recommendations will be taken into account for newly drafted legislation such as the implementing rules for air operations and licensing that are currently being developed. While drafting these implementing rules, the Agency also considered the ICAO amendment on safety management system and the associated State safety programme. The evaluation of the ICAO standards and recommended practices (SARPs) showed that many elements of COrA are addressed by the ICAO SMS philosophy. The ICAO objective of introducing SMS in all aviation fields necessarily leads to the same basic principles of organisation management and approval. The Agency has therefore decided to stop task MDM.004 as COrA implementation task and to address the COrA long term recommendations through different rulemaking tasks dealing with the implementation of the ICAO SMS. As explained above, this has already been started for the operations and pilot licensing implementing rules.
16. Consequently, task MDM.044 will not be continued; it will be replaced by separate tasks addressing continuing and initial airworthiness organisations.
17. Following the gradual approach and to ensure continued compliance with ICAO in the field of continuing airworthiness, Part-M and Part-145 require an immediate amendment. The task will provide a good basis to review applicable COrA recommendations, to be taken into account if not rendered obsolete by the SMS harmonisation exercise. In view of the ICAO SMS applicability date of 1 January 2009, the Agency envisages starting the task for Part-M and Part-145 as soon as possible and intends to finish it in 2009. This may bring a slight implementation delay for Part-M and Part-145 organisations. Harmonisation with the implementing rules on operations and pilot licensing will however be ensured as it follows the step by step approach. For the time being, there is no intention to amend Part-147.
18. Concerning design and production organisations, the Agency envisages creating a task in the rulemaking inventory to prepare for the implementation of the ICAO SMS provisions. The Agency does not consider this task urgent as there is no amendment in ICAO yet.
19. The coordination required between the different tasks will be carried out by the Agency with advice from AGNA and SSCC. It is expected that the general sharing of roles as set out in the Basic Regulation will require no change.
20. All these tasks will necessarily lead to assessing the regulatory structure. The provisions could be compiled in a certain way to support the harmonisation objective allowing for proper enforcement while reducing the risk of inconsistencies, overlapping and loopholes.

## VI. CRD table of comments and responses

Cmt #	Para	Comment provider	Comment/Justification	Response
1.	Explanatory Note  V.5.c	Airbus	<p>The transfer of the long term COra recommendations would certainly result in an improved set of rules, bringing some safety and economic improvements compared to the present situation, albeit difficult to quantify. However the deployment of option 3 may require significant rulemaking efforts, to be shared between the Agency, NAAs and stakeholders.</p> <p>This rulemaking activity cannot be considered in isolation. Indeed, the EASA rulemaking inventory already lists a number of ongoing, planned or envisaged tasks that are at least to some extent related to organization approvals:</p> <ul style="list-style-type: none"> <li>▪ MDM.003 Flight testing</li> <li>▪ MDM.014 Principal place of business</li> <li>▪ MDM.033 Issues arising from GERT</li> <li>▪ MDM.039 harmonization of enforcement systems</li> <li>▪ 21.016 Alternative procedure to DOA</li> <li>▪ 21.022 POA privileges</li> <li>▪ 21.023 Permit to fly</li> <li>▪ 21.024(a) Subpart J DOA</li> <li>▪ 21.024(b) The future of DOA</li> <li>▪ 21.042 Third party supplier control</li> <li>▪ 21.044 Foreign supplier surveillance</li> <li>▪ 145.015 MOE amendment records</li> <li>▪ 145.017 Control of suppliers</li> <li>▪ FCL.001 Implementing rules licensing</li> <li>▪ OPS.001 Implementing rules operations</li> <li>▪ APR.001 Implementing rules airport safety</li> <li>▪ ATM.001 Implementing rules for ATM/ACM</li> </ul> <p>There is a need for a coherent plan integrating all or part of those initiatives and the COra recommendations:</p> <p>As suggested in the A-NPA, the COra recommendations should be first adopted, as far as possible, in the implementing rules that are under development (operations and licensing) or to be developed (ATM, airports).</p> <p>Some tasks in the current inventory are related to similar subjects for different organization approvals and could be merged (e.g. supplier surveillance/control). Some tasks, considered for only one category of organization approvals, could be extended if</p>	<p>Noted.</p> <p>Noted.</p> <p>Agreed.</p> <p>Noted. The drafting of implementing rules for operations and licensing has started. COra long term recommendations will be taken into account. The drafting of implementing rules for airport and ATM has not started yet but will probably follow along the same lines.</p> <p>Noted. The EASA inventory will be reviewed in light of the result of this A-NPA and the implementation of the long term recommendations.</p>

Cmt #	Para	Comment provider	Comment/Justification	Response
			<p>appropriate to other organization approvals.</p> <p>Industry members in the SSCC have expressed their reluctance to GERT implementation for already adopted rules, as it appears not to offer a real safety benefit, and is likely to generate a lot of confusion and expense. Many of the COra recommendations can be adopted without changing the general layout of EASA regulations.</p> <p>Great care should be taken of the transition conditions between the existing system and the wished final system of "integrated organization approvals": first applicable to new organizations only, optional for existing organizations for a sufficient period before becoming mandatory. Applicable rules and their entry into force should be visible with sufficient notice, and adopted with a long-term view: iterations should be avoided.</p> <p>Consistency of organization approvals cannot be limited to intra-European consistency. In a global industry, consistency or at least compatibility with foreign approvals also needs to be considered. The COra Group's objective "Mutual recognition and acceptance of outputs with non-European countries" is the most important one, thus non-European Authority and Industry partners should be involved or at least consulted in COra rulemaking.</p> <p>Attention should be paid to the FAA Organization Delegation Authorization system, as recently adopted in FAR 183. As well, consideration should be given to extending to other organization approvals some ideas expressed during the recent consultation on the future of DOA. The possibility of nominating EASA designees (individuals or organizations) should be considered to complement the existing organisation approvals and provide a greater degree of autonomy with extended privileges to meet the challenges of controlling a global business.</p> <p>The COra Group's medium/long term objective of a "single approval system with variable scope" requires the resolution of some collateral issues, such as adaptation of the fees and charges system, distribution of supervision roles between the Agency (currently in charge of DOA and some POA/MOA) and national Authorities (generally in charge of POA, MOA, CAMOA, AOC...),</p>	<p>Noted. Regulations structure will not be changed for the sake of changing. But NPAs implementing the COra recommendation will necessarily assess the regulatory structure as well. Each NPA will encompass a Regulatory Impact Assessment for evaluating safety, economic, social and environmental impacts of any change. It is probably more important to have a coherent system supported by a sufficient structure than a system that lacks clarity because the structure in place is kept by all means. Furthermore, GERT is a proposal for regulatory structure. It could and should be adapted while drafting the content or amending the applicable rules.</p> <p>Noted. Tasks implementing the COra long term recommendations could consider certain transitional measures. For the existing airworthiness regulations, changes are expected to take place over a longer period leaving stakeholders sufficient time to adapt.</p> <p>Agreed. Non-European stakeholders are involved in all steps of the EASA RM process.</p> <p>Noted. The ideas presented will be considered with the applicable rulemaking tasks.</p> <p>Noted.</p>

Cmt #	Para	Comment provider	Comment/Justification	Response
			<p>need for polyvalent EASA/NAA inspectors or teams, etc.</p> <p>All in all, we support the implementation of the COrA long-term recommendations under certain conditions:</p> <ul style="list-style-type: none"> <li>Application first to future implementing rules;</li> <li>For existing implementing rules, identification of the issues to be solved in priority, considering safety improvements and economic benefits;</li> <li>Avoidance of "nice to have" amendments without clear benefits;</li> <li>Review and consolidation of tasks related to organization approvals in the EASA rulemaking inventory;</li> <li>Definition of reasonable transition conditions;</li> <li>Consideration of global trends and needs for extended privileges/delegation/accreditation;</li> <li>Adaptation of Agency/NAA organization and charging system(s).</li> </ul> <p>We suggest that the COrA implementation activities be organized along the above guidelines, under the leadership of a multi-disciplinary steering committee with stakeholders participation.</p> <p><b>Justification:</b> The ultimate, long-term objective of COrA (single approval system with variable scope) is attractive, provided the steps to reach it are built upon consideration of the real needs and expected benefits and ensure a seamless transition. Close management of the project, with stakeholders involvement, is necessary.</p>	<p>Please refer to the responses to each of the comments above.</p> <p>The Agency supported by AGNA and SSCC plays this role by setting general principles and adopting the yearly rulemaking programme. By doing so, stakeholder participation is ensured. Care is also taken that amendments to regulations and new regulations are drafted in a consistent and coherent manner.</p>
2.	General Comment	CAA UK	<p>Although the COrA proposals were never put into effect within JAA there were several discussions and general agreement with the principle in the FCL Committee at the time.</p> <p>As a result of publishing the JAA document unedited, there are incorrect references to JAR 145, 147 throughout rather than the current Parts. Its content, however, is acceptable.</p>	Noted.
3.	General Comment	CAA UK	<p>Our preferred option is (b)</p> <p>Even whilst preparing the Implementing Rules (within 1702/2003, 2042/2003, 2043/2003) it was obvious that variations existed between the various approval types e.g Manual, Exposition, or Handbook? Many were down to the original scripting of the approval requirements from the many and diverse groups</p>	<p>Noted.</p> <p>The majority of commentators is in favour of the long term recommendation. It provides for a smooth transition by taking a gradual approach. This result of the A-NPA will be followed. The Agency therefore does not consider necessary to invest time and resource for implementation of the short and medium term recommendations. While addressing the</p>

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			<p>involved, without thought for that which other groups may be doing. This caused inefficiencies and duplications whilst effecting the approvals. Removal of such factors is to be recommended and therefore OPTION a) SHOULD BE DISCOUNTED.</p> <p>At the opposite end of the scale the Long Term considerations include (in addition to Short and Medium Term proposals) better authority procedures, single rather than multiple approvals, mutual recognition of non (JAA) EU approvals and increases in efficiency. All of these items are worthy of serious consideration, however, the items concerning single approvals and mutual recognition may need to be considered separately and in depth. Many companies (particularly larger ones) may actually be more comfortable with separate approvals handled within the dedicated separate areas within those companies. Introduction of single approvals may add to costs and be a retrograde step! Mutual recognition where specific requirements would be harmonised across the states involved, needs careful consideration and time. Within the POA world (and to a lesser extent, DOA) some success has been achieved, particularly with the USA and Canada, however, the requirements continue to be refined, at least, 10 years after the exercise proper was started. OPTION c) IS COMMENDABLE, AND SHOULD BE THE ULTIMATE GOAL BUT REQUIRES FURTHER CONSIDERATION.</p> <p>Option b) reduces duplication, increases efficiencies, moves towards 'common' approvals, standardises quality, attempts to make privileges consistent, looks at SMS, considers smaller organisations and starts to look at mutual recognition. OPTION b) IS OUR RECOMMENDATION FOR IMPLEMENTATION ASAP.</p>	<p>long term recommendations account has to be taken of the existing environment and possible impacts of the changes proposed. This includes the single approval and mutual recognition.</p>
4.	Explanatory Note	Eurocopter + Eurocopter Deutschland	<p>According A-NPA, Item 22 and V. Regulatory Impact Assessment, Item 5c. Stakeholders choice of implementation, EUROCOPTER and EUROCOPTER Deutschland GmbH prefer the option "<b>3 – Long term</b>" in combination with some parts of the EASA "<b>General EASA Rule Template (GERT)</b>" approach. EUROCOPTER and EUROCOPTER DEUTSCHLAND GmbH would support / contribute the implementation of these recommendations and proposals under defined conditions resulting from a multidisciplinary steering group.</p> <p><b>General Comment(s) &amp; justification</b> The COra investigation &amp; report is JAR related, not really status of today and does not give either any clear identification of positive</p>	<p>Noted. The Agency supported by AGNA and SSCC plays this role by setting general principles and adopting the yearly rulemaking programme. By doing so, stakeholder participation is ensured. Care is also taken that amendments to regulations and new regulations are drafted in a consistent and coherent manner.</p> <p>Noted. As explained in the A-NPA, the task of COra implementation has been inherited from the JAA. Obviously,</p>

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			<p>impacts on stakeholders nor substantiations for the expected enhanced safety, increased efficiency or economic benefit. The assumption that many organizations hold more than one organisation approval does not mean that may is the majority. The majority of the organizations do hold only one approval.</p> <p>The fundamental idea to develop a global regulatory system that minimizes the need for overlapping regulations and reduce the risk of gaps or loopholes is essential. Both, COra and GERT concept should provide a consistent structure of aviation regulations, which ensures and adapts the need of the authority and the industry.</p> <p>The elaboration of a structure that does depart fundamentally from classical schemes and that can not be implemented using accepted regulations will need special attention and care in view of transition. It is very important to be in the position to reach international acceptance by avoiding deviation faraway and unnecessarily from classical schemes. This means also that the complete organisation approval system (incl. fees and charges), considering the EASA and all european national authorities involved, must be revised and all authorities must be part of that working group.</p> <p>A common organisation approval on European side could cause acceptance problems and may economic disadvantages if it is not globally compatible to other system, having in mind FAA organizations and the future FAA Organisation Designation Authorization (ODA) program, FAA Order 8100.ODA (delegation authorization system / designees).</p>	<p>these recommendations are linked to the JAA environment. However, the technical requirements do not differ fundamentally between the JAA and Community environment. Therefore, the recommendations can be transferred. Further consideration of the recommendations is however needed while amending or drafting the regulations. Each NPA will encompass a Regulatory Impact Assessment for evaluating safety, economic, social and environmental impacts of any change.</p> <p>The implementation of the long term recommendations provides for a smooth transition by taking a gradual approach. Nevertheless, transitional measures could be considered during drafting. Issues of international acceptance should be considered as well.</p>
5.	<p>Explanatory Note</p> <p>IV. para 19, 20, 22</p> <p>V.2</p> <p>V.5.c</p>	ASD	<p>In response to the above A-NPA consultation, ASD members are of the opinion that taking a long term view of changing the rules would be preferable. ASD is therefore in favour of the proposed Option N°3 i.e. starting with the implementation of COra Report long-term recommendations, under the following conditions/reservations:</p> <ul style="list-style-type: none"> <li>➤ International aspects of Option N°3 are quite significant and must not be underestimated. Conditions of mutual recognition of organisation approvals will have an impact on implementation of existing and future bilateral aviation safety agreement. In a more and more global industry, consistency with foreign approvals therefore needs be considered, which gives special importance to the relevant COra recommendation on "Mutual recognition and acceptance of outputs with non-JAA countries". Furthermore, important foreign authorities also</li> </ul>	<p>Noted. The issue is recognised as important for stakeholders. Due consideration will be given to it at the time.</p>

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			<p>are developing and/or initiating implementation of new principles for organisation approvals and associated authority surveillance (e.g; FAA). In such context, consideration should be given to inviting representatives from foreign authorities/industries to participate in the working group(s) tasked to work on Option N°3.</p> <ul style="list-style-type: none"> <li>➤ ASD concurs with the opinion that the COrA recommendations should be first incorporated in implementing rules that are at the drafting stage (operations, licensing ) and, at a later stage, in existing rules (i.e. in the field of airworthiness). However, there are many current or envisaged other rulemaking tasks related to organization approvals aspects and, when objectives are clearly identified, consideration could be to given to the possibility of including relevant CorA recommendations in these other rulemaking tasks.</li> <li>➤ Paragraphs IV. 20.c and V.2.a of the A-NPA Explanatory Note mention a possible link between Option N°3 and the adoption of a regulation structure as proposed by the General EASA Rules Template (GERT) concept. ASD wants to confirm that its support for Option N°3 must not be interpreted as a support for GERT. The GERT concept is not supported across the industry, and the current ASD position is not in favour of it, as it appears not to offer any real safety benefit, and is likely to generate a lot of confusion and expense. Similarly, ASD would be concerned if GERT is presented by EASA as the means to carry out Option N°3, and is therefore requesting that it is not presented in such a manner. Option N°3 can be carried out without GERT.</li> </ul> <p><b>Justification:</b></p> <ul style="list-style-type: none"> <li>- ASD preference for Option N°3 is essentially based on the desire to have a long term perspective and because it is felt that Option N°2 would not bring significant improvement (in particular for companies holding several approvals) and would not necessarily make a subsequent Option N°3 implementation easier.</li> <li>- Importance of international aspects of Option N°3 for maintaining level of mutual recognition of approvals by authorities.</li> <li>- The GERT concept currently is not supported by interested parties.</li> </ul>	<p>Noted. The EASA inventory will be reviewed in light of the result of this A-NPA and the implementation of the long term recommendations.</p> <p>Noted. Regulations structure will not be changed for the sake of changing. But NPAs implementing the COrA recommendation will necessarily assess the regulatory structure as well. Each NPA will encompass a Regulatory Impact Assessment for evaluating safety, economic, social and environmental impacts of any change. It is probably more important to have a coherent system supported by a sufficient structure than a system that lacks clarity because the structure in place is kept by all means.</p> <p>Furthermore, GERT is a proposal for regulatory structure. It could and should be adapted while drafting the content or amending the applicable rules.</p>
6.	General Comment	Austro Control	Austro Control supports A-NPA 15-2006 and the preferred option selected:	Noted.

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			<p>Option 3 transfer of the COrA long term recommendations.</p> <p>Comment: It should be re-considered if a single approval number is useful based on the different privileges granted.</p>	This should be taken into account during the discussions.
7.	General Comment	DGAC France	<p>At this stage we recommend to choose the “do nothing” option.</p> <p><b>Justification</b></p> <p>The context has significantly changed since the establishment of the COrA report with the adoption of the Basic Regulation 1592/2003 and its implementing rules 1702/2003 and 2042/2003.</p> <p>Organisations have already made significant efforts to transition from the JAR regulations to EASA regulations. If some large organisations having more than one approval may draw some benefit a large number of small and medium organisations with only one approval will face unnecessary administrative burden. The effort given on such administrative burden may be detrimental to the effort they could put on safety. In addition, according to paragraph 17 of the explanatory, “the RIA did not clearly identify the positive impact of such an exercise”.</p> <p>We understand that the Agency considers that a positive impact (but again only for those having several agreements) might be considered if the option of a single agreement is pursued. However, there is no clear rationale for such positive impact. In addition this would completely question the basic principles established by regulation 1592/2002, and maintained under the Commissions proposal COM (579)2005 of 16 November 2005 for its amendment, under which Member States are responsible for the approval of national organisations except for DOA, POA of multinational organisations and foreign organisations, where a centralised action was considered beneficial. This balanced system established under the principles of subsidiarity would be endangered with a single approval approach.</p>	<p>Noted.</p> <p>Noted. The context may have changed during the transition but the substance of the regulations did not. This makes the COrA recommendations valid for most of the regulations. Further consideration of the recommendations is however needed while amending or drafting the regulations. Each NPA will encompass a Regulatory Impact Assessment for evaluating safety, economic, social and environmental impacts of any change. The majority of commentators is in favour of the long term recommendation. It provides for a smooth transition by taking a gradual approach. The COrA long term recommendations will be taken into account for the newly drafted implementing rules first (OPS, Licensing, later on Airports, ATM). Changes to existing regulations follow step by step. If certain approvals cannot be integrated in a single approval process, it needs to be taken into account. It must also be considered if such a concept can be adapted to small activities.</p>
8.	Explanatory Note IV. para 19, 20, 22	EADS	General preference is for Option 3; but COrA recommendations not generally changing the existing EASA regulatory system but improving dedicated rules, these should be considered in ongoing rulemaking activities.	Noted. The COrA long term recommendations will be taken into account for the newly drafted implementing rules first (OPS, Licensing, later on Airports, ATM). Changes to existing regulations follow step by step along with existing rulemaking

Cmt #	Para	Comment provider	Comment/Justification	Response
			<p><b>Justification:</b> A new regulatory system as proposed by the complete set of COrA recommendations should be carefully assembled and implemented under a long term perspective to provide for worldwide acceptance in our global aviation business, i.e. on authority and industry side. There is no significant safety improvement justifying a short or medium term implementation of the complete set of COrA recommendations.</p>	tasks.
9.	General Comment	BMVIT	<p>Option 1 (Do Nothing) is supported.</p> <p><b>Justification:</b> The Ministry of Transportation, Innovation and Technology is supporting the DGAC France comment.</p> <p>In addition we draw the attention to a recommendation of the COrA group to make maximum use of Industry internal systems.</p> <p>This issue was discussed at a FAA/EU annual meeting and FAA made a very clear statement that such internal industry audits do not replace authority oversight and surveillance. This recommendation is not supported because Internal industry systems can support the required organisation quality systems but not replace the authority surveillance and control.</p>	<p>Noted. Please refer to the response to the comment of DGAC France.</p> <p>Agreed. Use of internal audit systems does not replace authority oversight.</p>
10.	General Comment	CAA Sweden	The Swedish Civil Aviation Authority wish to express its support to option C, long term recommendations.	Noted.
11.	General Comment	FAA	The FAA has reviewed the subject A-NPA and has no comments.	Noted.
12.	General Comment	CAA NL	<p>CAA NL suggests at this moment to use the "do nothing" option</p> <p><b>Justification:</b> Although the CAA-NL supports the idée to minimize the administrative burden on both industry and competent authority, at this moment we can not oversee the implications of the most far going option. This option may even initiate a reorganization of the NAA's to support a single approval on the NAA items, the least is a (probable) complete reprogramming of our Approval support system. We also see more problems with the divided competences between EASA and The NAA's for different approvals within the same company. On the whole we agree with the comments from France and Austria.</p>	Noted. The implementation of the long term recommendations provides for a smooth transition by taking a gradual approach. The COrA long term recommendations will be taken into account for the newly drafted implementing rules first (OPS, Licensing, later on Airports, ATM). Changes to existing regulations follow step by step. Each NPA will encompass a Regulatory Impact Assessment for evaluating safety, economic, social and environmental impacts of any change. Each of the changes will be subject of public consultation.

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			We also agree with EASA that the intermediate option has more costs than benefits and therefore is not a way to go.	
13.	11. Recommendations of the JAA COrA group	Aero-Club Switzerland	<p>Please use the letter "P" (for "permanent objectives") instead of S M L (for "short"/"medium"/"long" term objectives) Please delete "M" where "M L" is proposed.</p> <p><b>Justification:</b> "S M L" objectives are permanent ones, subdividing them is not adding clarity to the process to be followed. "M L" objectives are, as we see it, first of all long term objectives, therefore please use only "L" as priority designator.</p>	Noted. The COrA report was drafted by a JAA group to outline possible harmonisation issue. It is not the intention of this A-NPA or any following tasks in this respect to amend the COrA report itself. Instead, the recommendations will be taken into account for existing and future EASA regulations.
14.	General Comment	CAA SK	<p>CAA SK suggests "Option 1 (Do Nothing)"</p> <p><b>Justification:</b> The Civil Aviation Authority of the Slovak republic is supporting comments from France, Austria and Netherlands.</p> <p>Regardless of the CAA SK support of any administrative simplification in relation to industry and competent authority, at this moment we cannot agree with substitution of the authority surveillance and control by the internal industry system required by organization quality system.</p>	Noted. Please refer to the responses to the comments from DGAC France and CAA Netherlands. It is not the intention to replace oversight by internal audit systems.
15.	General comment  20.(c) Long term recommendations (page 7)	Snecma	<p>A-NPA says : "The long term recommendations, based on the COrA vision, propose one set of implementation procedures by authorities and a single approval system with variable scope. It would lead to one certificate or approval number for multiple approved organisations, whilst maintaining different criteria for approvals. This option implies therefore a major change for all organisations...."</p> <p>The proposed merging of DOA, POA and MOA agreements may create significant complication to most of the companies, as it does not represent common industrial organisation. The current scope of those agreements are different, not all designers are also manufacturers and/or maintenance shop facilities: the DOA is related to the design of a product, including design suppliers (different entities from the TCH), while the POA and the MOA are related to the capacity of a company (or of a plant) to manufacture or maintain a product, part or appliance.</p> <p>The benefit of the implementation of such a recommendation may</p>	As outlined in the A-NPA, approvals and associated procedures can only be harmonised up to a certain level. Due to the different nature of activities, some specific issues may remain. This needs to be addressed. Companies wishing to hold several approvals could use the same application and organisation management processes. There will be no need to comply with regulations that are not in the scope of the company activity. For the airworthiness regulations, the long term recommendations will be addressed step by step through various rulemaking tasks. This task is being currently pursued under RM task

Cmt #	Para	Comment provider	Comment/Justification	Response
			<p>be enhanced if the possibility to have a DOA for parts and appliances (like former JAR-21 JB) is restored. Therefore we support the creation of a new DOA (JB like) with no Authority's privileges, but allowing design supplier companies to exercise privileges upon agreement and delegation of the TC holder.</p> <p>In case that the proposed global agreement (regrouping DOA+POA+MOA) is adopted by the future regulation, this regulation should permit a company to apply for only one agreement without having the obligation to apply for the others agreements. For example, an applicant for a DOA may not be obliged to apply for POA and MOA.</p> <p>Finally, our understanding of the merging of DOA and MOA is that it is limited to Maintenance Shops belonging to the TCH Company.</p> <p><b>Justification:</b></p> <p>With the multiplication of cooperation agreements of several companies to build together a product, it appears impractical to merge different agreements (DOA, POA, MOA), simply because it doesn't represent the actual industrial organisation.</p> <p>For example several companies can create a consortium in one country (for one product.), different from the countries where they are based. The consortium postulates for a Type Certificate and in the same time for a DOA, but it would not produce any part or product. Some other companies (coming from the design consortium or not) are manufacturing the product within their own POA scope, and under Type Certificate Holder Licensees. POA and DOA holders are in this case completely different jurisdictional entities.</p> <p>In addition, Maintenance activities are not necessarily ensured by the DOA holder or POA holder. When a Maintenance Organisation is established, it can't be limited to the design of the TCH it would belong to.</p>	21.024(b).