EUROPEAN AVIATION SAFETY AGENCY
AGENCE EUROPÉENNE DE LA SÉCURITÉ AÉRIENNE
EUROPÄISCHE AGENTUR FÜR FLUGSICHERHEIT

Standard changes/repairs update

Rulemaking task RMT.0245 (MDM.048)

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Standard changes/repairs

- Reg. EU 748/2012 ("*the new Part 21*") was adopted in August 2012.

- Introduced, among other things, the concept of **standard changes/repairs**.

- While the regulation is in force, the standard changes/repairs cannot be applied until Certification Specifications are developed. This is the objective of MDM.048.

- Regulation EU 593/2012 amended EC 2042/2003 to allow the installation of Standard changes/repairs → M.A.304 data for modifications and repairs.

Standard changes/repairs

- **21.A.90B Standard changes**

(a) Standard changes are **changes to a type design**:

1. in relation to:

    (i) aeroplanes of 5 700 kg Maximum Take-Off Mass (MTOM) or less;

    (ii) rotorcraft of 3 175 kg MTOM or less;

    (iii) sailplanes, powered sailplanes, balloons and airships, as defined in ELA1 or ELA2,

2. that follow design data included in **certification specifications issued by the Agency,** containing acceptable methods, techniques and practices for carrying out and identifying standard changes, including the associated instructions for continuing airworthiness; and

3. that are not in conflict with TC holders data.

(b) Points **21.A.91 to 21.A.109 are not applicable** to standard changes.

Standard changes/repairs

Points 21.A.91 to 21.A.109 are not applicable to standard changes.

-No minor vs. major distinction,

-The change requires no design approval.

No need for an EASA or DOA involvement to design a modification to the type design. Instead the Certification Specification - Standard Change (CS-SC) will have to be fulfilled.

Same applies for the concept 21.A.431B Standard repairs.

Standard changes/repairs

* Changes to the AFM (i.a.w. CS-SC) would not require specific approval.

* These changes will have to be embodied i.a.w. Part M or Part 145. This affects:

-Manufacturing of parts.

-Embodiment of parts without a Form1 → new M.A.307 (c)

-Aircraft release to service by an adequate person → responsibility for embodiment of a standard change/repair.

-Potential impact on instructions for continuing airworthiness/maintenance programme.

-The embodiment of the standard change will have to be recorded as part of aircraft records → basis for inspections in Airworthiness reviews.

Standard changes/repairs

Current status of the rulemaking activity:

* CS-SC will follow new rulemaking process, including consultation.

There is no formal rulemaking group. Technical contents are being developed by staff from Certification directorate and NAAs.

* CS-SC will be developed in more than one phase: first phase will contain easier changes or more demanded changes considered it will no have a safety impact.

* So far progress has been slow, since the concept is new.

Standard changes/repairs

- Some examples of potential standard changes. :
  - FLARM installation
  - Mode S transponder installation
  - Radio exchange
  - Battery change
  - Structural metal repairs for certain structures
  - …

Other proposals from the industry may be considered once some experience is gained.

Standard changes/repairs

CS-SC/SR will contain:

- General subpart: suitability of parts, parts identification, instructions for continuing airworthiness, record keeping, declaration of compliance and installed responsibility,…
- Specific chapters for each standard change/standard repair:
  - purpose
  - applicability (within 21A.90B)
  - limitations
  - installation : - it may require equipment ETSO approved
    - it may include required testing (*)
  - affected aircraft manuals
  - records to be retained

(*) It will refer to standard practices (compiled in an annex or external references or equipment manufacturer functional test).