



Notice of Proposed Amendment 2024-07

in accordance with Article 6 of MB Decision 01-2022

Regular update of CS-MMEL and CS-GEN-MMEL

RMT.0499

EXECUTIVE SUMMARY

This NPA proposes the update of the Certification Specifications for Master Minimum Equipment List (CS-MMEL) and of the Certification Specifications for Generic Master Minimum Equipment List (CS-GEN-MMEL) considering the principles of harmonisation and possible relief of items under special operating conditions, limitations or procedures for a specific aeroplane type or model.

The objectives are summarised below:

- Introduction of items covered by Federal Aviation Administration (FAA) Policy Letters that are not yet included in CS-MMEL/CS-GEN-MMEL, such as cabin/galley storage
- Harmonisation of the airborne collision avoidance system (ACAS) rectification interval in accordance with the related FAA Policy Letter and in line with the recommendation of the EASA working group in the field;
- Alignment with the FAA MMEL Policy Letter for relief of items following its latest update in the field of long-range communications.

The proposed regulatory material is expected to facilitate the applicants' compliance with the operational suitability data (OSD) requirements for MMEL and increase efficiency by rendering the evaluation process of applications more comprehensible. Overall, the proposed changes are expected to have a moderate safety benefit and no social or environmental impact, while some economic benefits are expected by streamlining the certification process.

REGULATION(S) TO BE AMENDED/ISSUED

N/A

ED DECISION(S) TO BE AMENDED

ED Decision 2021/008/R

ED Decision 2020/012/R

AFFECTED STAKEHOLDERS

Design organisations of complex motor-powered aircraft and other design organisations dealing with changes or supplemental type certificates to these aircraft; design organisations of other than complex motor-powered aircraft.

WORKING METHODS

Development

By EASA

Impact assessment(s)

Light IA

Consultation

Public – NPA

RELATED DOCUMENTS / INFORMATION

ToR [RMT.0499](#) issued on 9.4.2018

PLANNING MILESTONES: Refer to the latest edition of the EPAS Volume II.



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1. About this NPA

1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) identified the need to mitigate an identified potential issue (as described in Chapter 2), and after having assessed the impacts of the possible intervention actions identified rulemaking as the necessary intervention action.

This rulemaking activity is included in the 2024 edition of Volume II of the European Plan for Aviation Safety (EPAS) for 2023–2025¹ under Rulemaking Task (RMT).0499.

EASA developed the regulatory material in question in line with Regulation (EU) 2018/1139² (the Basic Regulation) and the Rulemaking Procedure³, as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for this RMT⁴.

1.2. How to comment on this NPA

The draft regulatory material is hereby submitted for public consultation. NPA 2024-07 is divided in three parts. The present NPA 2024-07 (A) includes the background information pertaining to the regulatory proposal. NPA 2024-07 (B) and NPA 2024-07 (C) include the proposed amendments.

Please submit your comments using the **Comment-Response Tool (CRT)** available at <http://hub.easa.europa.eu/crt/>⁵.

To facilitate the collection and technically support the subsequent review of comments by EASA in an efficient, controlled and structured manner, stakeholders are kindly requested to submit their comments to the respective predefined segments of the NPA within the CRT, and refrain from submitting specific comments or all their comments to the 'General Comments' segment.

Further, once all comments are placed to the respective predefined segments, there is no need to submit them (as a pdf attachment) to the 'General Comments' segment.

The deadline for the submission of comments is **17 March 2025**.

¹ [European Plan for Aviation Safety \(EPAS\) 2023-2025 | EASA \(europa.eu\)](#)

² Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/eli/reg/2018/1139/oj>).

³ EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 ([EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 \(by written procedure\) | EASA \(europa.eu\)](#)).

⁴ [ToR RMT.0499 - Regular update of CS-MMEL | EASA](#)

⁵ In case of technical problems, please send an email with a short description to crt@easa.europa.eu.



1.3. The next steps

Following the consultation of the draft regulatory material, EASA will review all the comments received and will duly consider them in the subsequent phases of this rulemaking activity.

Considering the above, EASA may issue a Decision issuing the certification specifications (CSs).

When issuing the Decision, EASA will also provide feedback to the commentators and information to the public on who engaged in the process and/or provided comments during the consultation of the draft regulatory material, which comments were received, how such engagement and/or consultation was used in rulemaking, and how the comments were considered.



2. In summary — why and what

2.1. Why we need to act

The aviation industry is complex and rapidly evolving. CSs and acceptable means of compliance (AMC) need to be updated regularly to ensure that they are fit for purpose, cost-effective and can be implemented in practice.

Regular updates are issued when relevant data is available following an update of industry standards, feedback from certification activities or minor issues raised by the stakeholders.

Furthermore, the EASA-FAA Technical Implementation Procedures (TIP) for Airworthiness and Environmental Certification include a validation procedure for an initial MMEL and changes to an existing MMEL. To facilitate validation, harmonisation of standards between EASA and FAA should be pursued.

2.1.1. Description of the issue

The main issues are listed below:

Firstly, the current CS-MMEL/CS-GEN-MMEL guidance material (GM) is based on the DGAC's Temporary Guidance Leaflet (TGL)-26, dated 2008. Since then, new items have been introduced in the aircraft for which additional GM is needed. The introduction of these items in the GM will facilitate MMEL development for EU OEMs, the EASA validation of FAA MMELs and the MELs approval for the NAAs.

Secondly, in CS-MMEL/CS-GEN-MMEL Issue 3 GM, the rectification interval for the ACAS inoperative is 10 calendar days while the FAA Policy Letter 032 provides for a rectification interval of 3 calendar days (with the possibility to be extended once for the same duration). This item was recently discussed within the EASA working group 'ACAS Resolution Advisory not followed' and it was agreed to harmonise CS-MMEL/CS-GEN-MMEL with the rectification interval of the FAA, considering the increasing air traffic in the EU and the associated event probability.

In addition to the above, the current operational procedure associated with the autopilot item in CS-MMEL/CS-GEN-MMEL Issue 3 does not include specific operational restrictions for helicopters. To clarify the affected operations, some examples of operational restrictions for helicopters with autopilot inoperative are added to the operational procedure.

2.1.2. Who is affected by the issue?

Type-certificate (TC) and supplemental type-certificate (STC) holders are affected since these updates will have an impact on their MMEL development. Air operators will also be affected when developing their own MEL.

2.1.3. Conclusion on the need for rulemaking

EASA concluded, as explained further in Chapter 3 below, that rulemaking was appropriate and that other non-regulatory actions could not have effectively addressed the above issues.



2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. The regulatory material presented here is expected to contribute to achieving these overall objectives by addressing the issues described in Section 2.1.

The objective of this RMT is to regularly address miscellaneous issues of non-controversial nature, to ensure that the CS are fit for purpose, cost-effective and can be implemented in practice. A regular update is used to incorporate special conditions, certification memoranda and other material supporting the application and interpretation of existing CSs as established by EASA during previous certification projects, and to address non-complex and non-controversial issues raised by stakeholders.

The objectives are summarised below:

- Introduction or revision of items covered by FAA Policy Letters and not yet harmonised in CS-MMEL/CS-GEN-MMEL.
- Amendment of CS-MMEL to introduce relief for new required equipment under EU Regulations.
- Amendment of CS-MMEL and CS-GEN-MMEL based on experience gained with stakeholders.

2.3. How we want to achieve it — overview of the proposed amendments

2.3.1. General overview

Some items have been considered eligible for harmonisation and, consequently, CS-MMEL and CS-GEN-MMEL GM is updated in line with FAA Policy Letters on cabin/galley storage items, ACAS and long-range communication system.

To incorporate possible reliefs following the latest amendments of Regulation (EU) 2015/640⁶ (Part-26) and Regulation (EU) No 965/2012⁷ (Air OPS Regulation), and to improve consistency with Regulation (EU) No 748/2012⁸, the new issue of CS-MMEL and CS-GEN-MMEL:

- introduces and/or modifies GM for relief of the runway overrun awareness and alerting system (ROAAS), tyre pressure monitoring system, additional medical equipment and usage monitoring system transponder; and
- extends the applicability of CS-GEN-MMEL, on a voluntary basis, to aeroplanes categorised as European Light Aircraft ELA1 and ELA2 for applicants wishing to benefit from an MMEL, substituting Part 21 GM on the same topic.

⁶ Commission Regulation (EU) 2015/640 of 23 April 2015 on additional airworthiness specifications for a given type of operations and amending Regulation (EU) No 965/2012 (OJ L 106, 24.4.2015, p. 18) (<http://data.europa.eu/eli/reg/2015/640/oj>).

⁷ Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1) (<http://data.europa.eu/eli/reg/2012/965/oj>).

⁸ Commission Regulation (EU) No 748/2012 of 3 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations (recast) (OJ L 224, 21.8.2012, p. 1) (<http://data.europa.eu/eli/reg/2012/748/oj>).



Based on experience gained with stakeholders, the GM on first-aid oxygen dispensing units, use of time limited dispatch (TLD) report content, and radio altimeter with an audio voice warning has been improved for a better understanding and applicability.

More specifically and to achieve the above-mentioned objectives, the following changes are introduced.

2.3.2. Harmonisation with the FAA

- Introduction of items covered by FAA Policy Letters into CS-MMEL/CS-GEN-MMEL (i.e. cabin/galley storage items).
- Harmonisation of the ACAS rectification interval in accordance with the related FAA Policy Letter and in line with the recommendation of the EASA working group on ‘ACAS Resolution Advisory not followed’.
- Harmonisation of items relief in the field of long-range communications with the latest release of FAA MMEL Policy Letter 106 on ‘High Frequency (HF) Communications’.

2.3.3. Review of CS-MMEL to introduce relief for new required equipment

- Introduction of the limitation established by the Surveillance Performance and Interoperability Implementing Regulation regarding transponder temporarily inoperative (Commission Implementing Regulation (EU) 2023/1770⁹).

In 2020, Article 5 of Regulation (EU) No 1207/2011, as amended by the Regulation (EU) 2020/587, introduced a temporal limitation for the inoperability of some transponder functions and of the automatic dependent surveillance - broadcast (ADS-B OUT). At the time, in order not to further delay the publication of the ongoing amendment of the affected CS-MMEL/CS-GEN-MMEL items, a note was temporarily introduced to make TC holders aware of the impact of this limitation on the dispatch conditions. The content of the note is now transferred in the dispatch condition of the transponder and the ADS-B-OUT inoperative.

- Introduction of a relief for the usage monitoring system (UMS) for helicopters

Points CAT.POL.H.305 and CAT.POL.H.420 of Regulation (EU) No 965/2012 require UMSs:

- for helicopter operations without an assured safe forced landing capability; and
- for helicopter operations over a hostile environment located outside a congested area.

Since points CAT.POL.H.305 and CAT.POL.H.420 do not specify any relief framework in case of UMS failure, today it is up to the OEMs to propose to EASA a relief for the system. To address this issue, a relief in CS-MMEL is introduced.

- Introduction of a relief in CS-MMEL to allow the release of aircraft with the following related equipment inoperative

⁹ Commission Implementing Regulation (EU) 2023/1770 of 12 September 2023 laying down provisions on aircraft equipment required for the use of the Single European Sky airspace and operating rules related to the use of the Single European Sky airspace and repealing Regulation (EC) No 29/2009 and Implementing Regulations (EU) No 1206/2011, (EU) No 1207/2011 and (EU) No 1079/2012 (http://data.europa.eu/eli/reg_impl/2023/1770/oj).



- for operators of large aeroplanes used in commercial air transport, introduction of MMEL relief for equipment required by the latest update of Part-26 (ROAAS and tyre pressure monitoring system).
- for operators of large aeroplanes and helicopters, introduction of an MMEL relief for the additional medical equipment, as per Annex VIII to Commission Regulation (EU) 965/2012 on Air Operations.

The latest AMC2 SPO.IDE.A.165 and AMC2 SPO.IDE.H.165 refer to the transport of additional medical equipment together with the initially requested first aid kit (FAK). Presently, this item is treated differently by each OEM. Guidance on an acceptable relief applicable to all the affected OEMs is needed to reduce the burden on OEMs and to ensure a level playing field. Consequently, a relief for this equipment is introduced in CS-MMEL.

2.3.4. Experience gained with stakeholders

- Impact of the latest CS-AWO (All-weather operations) on CS-MMEL and CS-GEN-MMEL

For the item radio altimeter with an audio voice warning inoperative, additional guidance and limitations were added to CS-MMEL when offshore standard approach procedures (OSAP) and helicopter special authorisation category I (HELI SA CAT I) operations are performed.

Consequently, the Radio Altimeter with an Audio Voice Warning item relief and the relative 'Additional considerations' paragraph in CS-MMEL/CS-GEN-MMEL are improved for better clarity.

- Improvement of GM3 CS-MMEL.145 'Justification of MMEL items'

To align the CS-MMEL GM with the certification memorandum CM-MMEL-001 and CS-E 1030, paragraph 1(c) of GM3 CS-MMEL.145 'Dispatch with engine faults covered by a TLD report' has been expanded to clarify that dispatch with engine system faults for which a TLD approval is not required may be included in the TLD report to support justification of the related MMEL item.

- Addition of references to the relevant GM1 MMEL.145 'Justification of MMEL items'

When relief for an item subject to Certification Specifications (e.g. CS-25, CS-26) is introduced in the MMEL, the justifications provided by the applicant must include the necessary information to retain compliance with those specifications.

With this aim, paragraph (b) of GM1 MMEL.145 is added requiring to include, in the justification, information related to the compliance with the applicable Certification Specifications.

- Improvement of the additional considerations on first-aid oxygen supply time (item 35-15-1 of CS-MMEL)

Additional considerations on first-aid oxygen supply time were added to clarify the computation of the minimum number of first-aid portable oxygen dispensing units in some configurations.

- Extension of the applicability of CS-GEN-MMEL to aeroplanes belonging to the European Light Aircraft ELA1 and ELA2 categories on a voluntary basis

Part 21 GM provided a method to generate a document that could be used in lieu of the MMEL for European Light Aircraft (ELA 1 and ELA 2) if required by the TC applicant/holder. EASA has



determined that a more consistent approach was necessary. Therefore, the applicability of CS-GEN-MMEL is extended, on a voluntary basis, to these categories of aeroplanes.

2.4. What are the stakeholders' views

At this stage stakeholders are expected to support the changes since overall the topics are considered non-controversial. The views of stakeholders will be better known after the public consultation.



3. Expected benefits and drawbacks of the proposed regulatory material

The proposed amendments are expected to facilitate the applicants' compliance with the OSD requirements for flight crew and improve efficiency by rendering the evaluation process for OSD certification more comprehensible. Overall, the proposed amendments will provide moderate safety benefits and would have no social or environmental impacts, while some economic benefits are expected by streamlining the certification process.



4. Proposed regulatory material

Please refer to:

- NPA 2024-07 (B) — Proposed amendments to CS-MMEL
- NPA 2024-07 (C) — Proposed amendments to CS-GEN-MMEL



5. Monitoring and evaluation

No monitoring provisions are considered necessary for this regular update.



6. Proposed actions to support implementation

N/A



7. References

- Commission Regulation (EU) 2015/640 of 23 April 2015 on additional airworthiness specifications for a given type of operations and amending Regulation (EU) No 965/2012 (OJ L 106, 24.4.2015, p. 18) (<http://data.europa.eu/eli/reg/2015/640/oj>)
- Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1) (<http://data.europa.eu/eli/reg/2012/965/oj>)
- Commission Regulation (EU) No 748/2012 of 3 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations (recast) (OJ L 224, 21.8.2012, p. 1) (<http://data.europa.eu/eli/reg/2012/748/oj>)



Appendix — Quality of the NPA

To continuously improve the quality of its documents, EASA welcomes your feedback on the quality of this document with regard to the following aspects:

Please provide your feedback on the quality of this document as part of the other comments you have on this NPA. We invite you to also provide a brief justification, especially when you disagree or strongly disagree, so that we consider this for improvement. Your comments will be considered for internal quality assurance and management purposes only and will not be published (e.g. as part of the CRD).

1. The regulatory proposal is of technically good/high quality

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

2. The text is clear, readable and understandable

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

3. The regulatory proposal is well substantiated

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

4. The regulatory proposal is fit for purpose (achieving the objectives set)

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

5. The regulatory proposal is proportionate to the size of the issue

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

6. The regulatory proposal applies the ‘better regulation’ principles^[1]

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

7. Any other comments on the quality of this document (please specify)

^[1] For information and guidance, see:

- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en
- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en

