



**EASA**  
European Aviation Safety Agency



Simpler, lighter, better rules for  
General Aviation

# PART-21 Proportionality

## Introduction of proportionality & simplification of airworthiness & environmental certification regulations for small aircraft

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***As part of RMT.0689 EASA intends to provide immediate and significant simplifications to companies developing and building small aircraft.***

***Step 1 of the approach makes a wide range of simplifications available that affect Design and Production of these products, already in Summer 2017. Step 2 aims to implement the provisions for declarative systems, that the upcoming revised Basic Regulation is expected to offer.***

***The EASA Part-21 Proportionality Session at AERO is held to present the proposed amendments of AMC of Step 1 to the affected stakeholders, and to provide affected stakeholders the opportunity to discuss and to provide feedback.***

***The EASA Part-21 Proportionality session will take place on Friday 7 April 2017, AERO Friedrichshafen, 11:00, "Rome", Conference Center East***

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Current Part-21 rules are considered not to provide sufficient proportionality to the risks and safety level that is considered acceptable to aircraft of simple design and low complexity in the low end of GA. As a consequence, certification cost and administrative burden are high for the small aircraft community that is the least tolerant to this.

In particular, the Agency has identified a high procedural burden for Production Organisation Approval and Design Organisation Approval. The Agency has decided to take a two-step approach to establish alleviations allowing for more proportionate application of the rules, in order to already allow in a first step the generation of significant alleviation in a very short timeframe.

***Step 1 – Immediate Actions:***

Step 1 can be achieved immediately, by not changing the underlying regulations, i.e. Part-21. Instead, AMC to Part-21 are improved. This may sound like a minor correcting variable, but indeed many of today's hurdles do not originate from Part-21 as such, but from the current AMC (which in the first place address companies with complex production chains and large aircraft). Considering this, proportionate AMC could resolve the majority of the problems observed.

AMC are issued on the basis of an Agency Decision, directly by EASA. To reflect a generally supported proportionate treatment of small companies, the Agency has decided to accelerate the rulemaking procedure and to conduct a focussed consultation through workshop at EASA, instead of consulting the proposed amendments via a Notice of proposed Amendment (NPA). The workshop will be organised in short time following AERO. Furthermore, the Agency's Advisory bodies will be consulted on the draft AMC.

The new AMC are planned to be issued following that workshop, in Summer 2017.

In addition, the Agency intends to gain immediate experience and verification of the alleviations. To this end, the draft AMC will be tested in dedicated pilot cases,.

In a nutshell, the following amendments will be proposed to the AMC: A new set of AMC for Production organisation will allow for a significantly more compact Quality Assurance System that is tailored around the requirement to verify that manufactured products comply with the Type Design. The approach allows for a significant amount of procedural expectations to be excluded, significantly reducing administration and overhead. As this approach has a direct effect to the way how the Authorities have to conduct investigations, a second comprehensive set of new AMC has been developed with respect to the requirements to the Competent Authorities. This way it is ensured, that also the supervision process meets the changed scope.

An equivalent approach has been taken with respect to Design Organisation Approvals. Established expectation on the basis of the current AMC is to ensure and manage detailed design process definitions, together with the Design Assurance System. The newly generated set of comprehensive AMC will reduce the focus down to the Design Assurance System as such, asking for independent verification of compliance, monitoring of significant events, classification of changes and independent monitoring of the Design Assurance System. It will be ensured that the design result does comply with the certification basis. The path that the company is using in order to come to a certifiable design is no more within the scope of the new set of AMC.

In both cases - Design and Production - the direct result for the companies is that the amount of paperwork to be created and maintained is significantly reduced. The need to change established practice in companies that like to grow into the EASA system is greatly eliminated, nevertheless being able to obtain the privileges associated with the relevant Organisation Approval.

In both cases, the new AMC will be applicable to companies developing products that are otherwise eligible for Part-ML procedures, such as for example aeroplanes up to 2.730 kg MTOM. The AMC defines the minimum for the “lower corner” of GA, but is drafted in a proportionate way that results in smooth growth of the quality and assurance system, as company and product size and complexity grow, ultimately connecting to established Part-21 implementations for large products and companies.

### *Step 2 – Actions related to the revision of the basic Regulation*

Step 2 builds upon the experience obtained in Step 1 and in addition makes use of the enhanced options expected from the revision of the basic Regulation. This update will lead to new and less restrictive Part-21 requirements as such, therefore allowing other alleviations than in Step 1.

One key element of relevance to light aviation expected from the revised basic Regulation is to allow for declarative elements, commensurate to the risk involved with the relevant product. Declarative systems are in use for

aviation in several sectors, the most prominent one being the US-LSA class, allowing for manufacturer to self- declare the compliance and conformity for full aircraft. Therefore, a broad range of experience with versions of such declarative systems exist, which have been carefully analysed before exploring the options within the EASA system.

As of today, one possible scenario has been worked out, how declarative elements can be brought into the system. The scenario builds upon several elements of assistance to the applicant, in return giving the option to declare compliance for Type Designs and conformity for manufactured products, with an Authority oversight that is reduced by the maximum extent. The system includes options for early product sales to generate income for the companies affected, especially when considering growing product sizes.

The system using declarative elements is defined in a way that it allows for a natural growth of a company, into the alleviated system that is introduced in Step 1 of this RMT, and further on into today's established systems, when considered adequate either by company or product size, or complexity.

In addition to declarative elements, Step 2 will include improvements to the changes done in Step 1, on the basis of lessons learned from pilot projects and follow-on applications.

*EASA Part-21 Proportionality Session (Friday 7 April 2017, AERO Friedrichshafen, 11:00, "Rome", Conference Center East):*

Join this session while you are visiting AERO, as designer or manufacturer of aircraft, as aircraft operator, or as aircraft pilot, or as aviation enthusiast. The task force highly depends upon feedback to the AMC draft versions, and to the scenario worked out for Step 2. Primary focus of this effort is to provide a system that helps the users. Only when this can be achieved, the secondary focus makes sense to structure this approach in a way that adequate safety, proportionate to the kind and complexity of the product and operation, is achieved. The timeline for Step 1 is extremely short, offering benefits immediately, but also requiring rapid feedback by the affected stakeholders, in order to meet their needs.