



Update on current rulemaking activities (Initial Airworthiness) POA Seminar 2019

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Recent regulatory changes and proposals (Part-21)

Regulations amended

Nil since 2016

Regulations adopted by not yet published/in force

- ▶ Amendment to Regulation 748/2012 (Part 21)
 - ▶ Based on EASA opinions 7/2016 (RMT.0262 **LOI**), 9/2017 (RMT.0513, 0514 **CAEP/10**), and partially 1/2017 (RMT.0393 **Maintenance Check Flights**)

Decisions published

- ▶ AMC/GM Part-21 issue 2, amdt. 8
 - ▶ RMT.0689 **Part-21 proportionality**



Consultations

- ▶ RMT.0262 **LOI** (2nd set of AMC/GM), closed 15 May 2019
- ▶ RMT.0251 **SMS**

Recent regulatory changes and proposals (Part-26)

Regulations amended

- Regulation 2015/640 (Part 26) amended by Regulation 2019/133
 - **Seat crashworthiness** (RMT.0069)
 - **Thermal/acoustic insulation material** (RMT.0071)
 - **Halon replacement** (RMT.0560)

EASA opinions pending adoption

- Opinion 12/2016 (RMT.0225 **ageing aircraft**) proposing to amend Part 26
 - Still under discussion

Decisions published

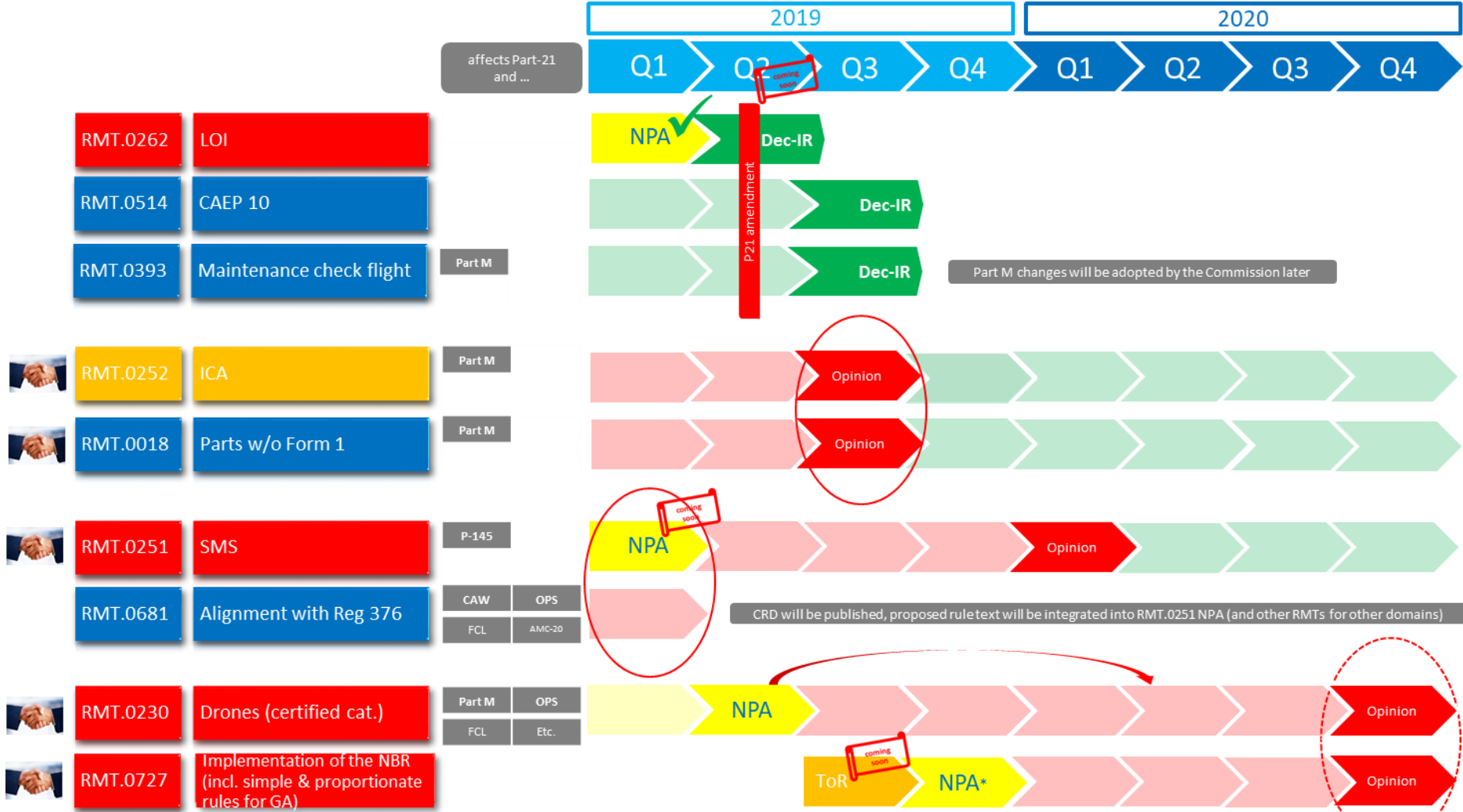
- CS-26 amdt. 1
 - RMTs.0069, 0071 and 0560 **seat crashworthiness, thermal/acoustic insulation material and halon replacement**



Consultations (ongoing)

- RMT.0070 **Class D cargo compartments** (Part-26)

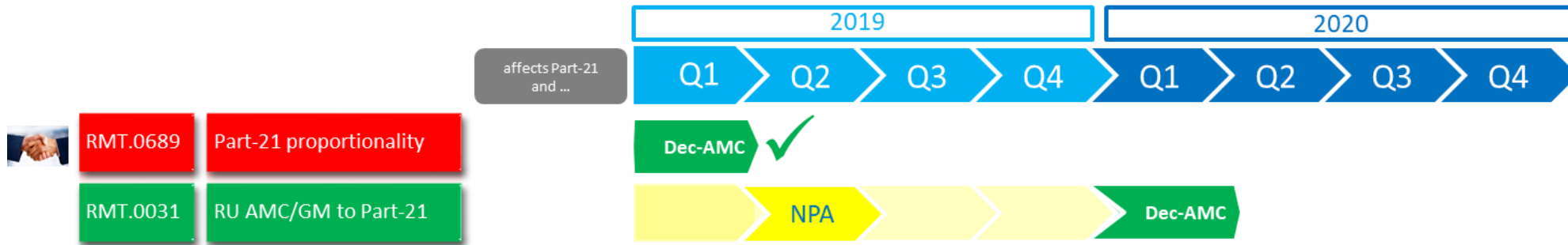
RMTs affecting Part-21



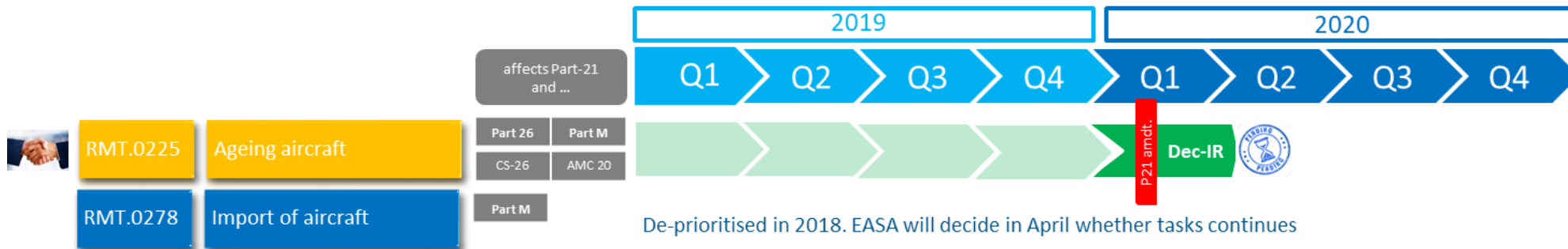
*consultation mechanism tbd.

RMTs affecting Part-21 (other)













➤ Affecting only AMC/GM to Part 21



➤ Affecting mainly other Regulations with slight amendments to Part-21



Abbreviations, signs and symbols

	Strategic task
	Important task
	Standard task
	Regular update task
	Harmonisation with bilateral partners
	Delivery completed
	Delivery postponed
	Postponed to free resources for NBR
	Technical work completed, delivery ahead
	Use of Art. 15 or Art. 16 procedure
	Publication pending adoption of the IR
	Delivery cancelled

ToR	Terms of Reference
NPA	Notice of Proposed Amendment
A-NPA	Advanced Notice of Proposed Amendment
ABC	Advisory Body Consultation
Dec-CS	Decision re Certification Specification
Dec-AMC	Decision re Means of Compliance to IR
Dec-IR	Decision pending adoption of Implementing Rule
Opinion	Proposal to European Commission
Dec/O	Combined Decision (CS or AMC) & Opinion
RU	Regular Update

RMT.0018: Parts without EASA Form 1

Simple, lighter, better rules for General Aviation

Objective: Components can only be installed if accompanied with EASA Form 1 or equivalent (except standard parts and raw material). Some parts are not designed or manufactured specifically for aviation use (light bulbs, fire axes, smoke detectors,...). This task assesses a more proportionate and efficient requirements to allow the installation of components based on the safety consequences should the component fail.

The objective is to allow that parts with lower criticality, as identified by the TC holder, would not need an EASA Form 1 when used as spare part for installation during maintenance. In practice, the parts would be classified into different manufacturing criticality levels (MCLs).

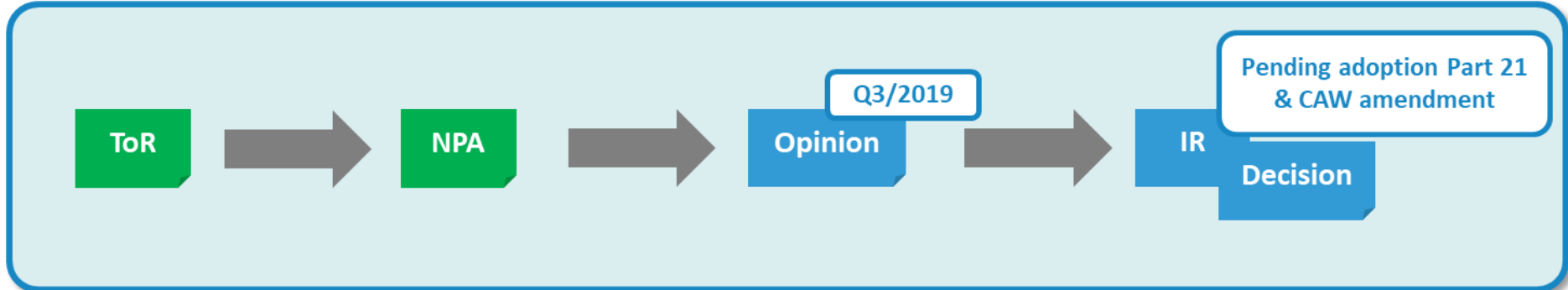
Part-21

CAW Reg.

AMC/GM

Controversial issues: MCL classification (number and definition); relying on TCH to develop the parts' MCL; need of Form 1 as CRS for maintenance; DO/PO missing relation when no POA; impact on bilateral agreements.

AB position: consult stakeholders on conclusions after review of comments



RMT.0251, Embodiment of SMS, NPA 2019-05

Objective: to amend Part-21 (and Part-145) to include SMS requirements, and related AMC/GM for design, production and maintenance organisations to align with ICAO Annex 19.

Part-21

CAW Reg.

AMC/GM

Controversial issues: Minimum threshold applicability; level of consistency with other domains; recognition of industry standard

AB position: Advised to recognise industry standard as AMC to Part-21

ToR

Q2/2019

NPA

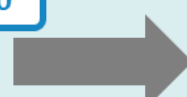
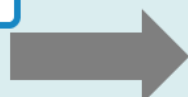
Q1/2020

Opinion

IR

Decision

Pending adoption Part 21
& CAW amendment



RMT.0252: Instructions for CAW

Objective: Establish clear requirements and responsibilities for all parties involved in the production of ICAs, their approval and their implementation.

- ▶ Definition and completeness of ICA (Subtask 1), availability of ICA (Subtask 2) and acceptance of ICA (Subtask 4).
- ▶ Certification maintenance requirements (Subtask 5) has been published.

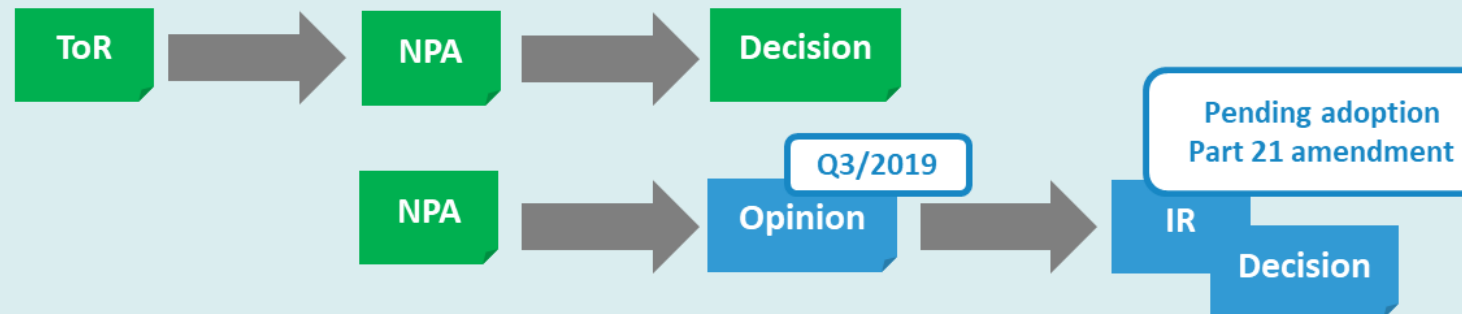
Part-21

AMC/GM

CS-25

Controversial issues: clarify ICA status as part of TC without imposing a cumbersome process and harmonisation with FAA

AB position: supportive of the task and well represented in the working group



RMT.0262: Lol, Phase II(AMC/GM), NPA 2019-03

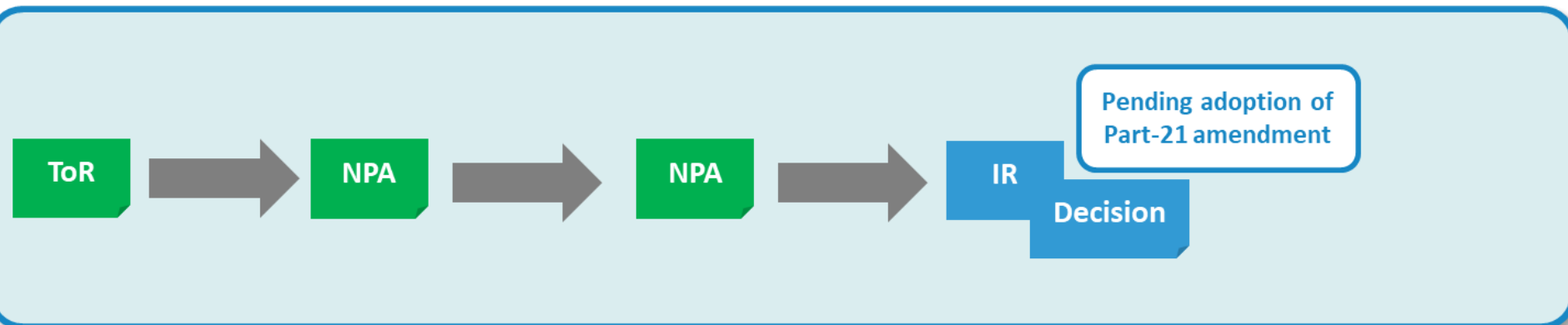
Objective: LOI implementation, Phase II.

More than 60 new or amended AMC/GM have been drafted to support the implementation of the new elements proposed by the Opinion 07/2016 and to reflect the changes proposed by Opinion. Particular attention has been paid to the explanation of the criteria to be considered for EASA LOI determination and to the introduction of the new privilege to approve major changes/repairs or STC.

AMC/GM
to Part-
21

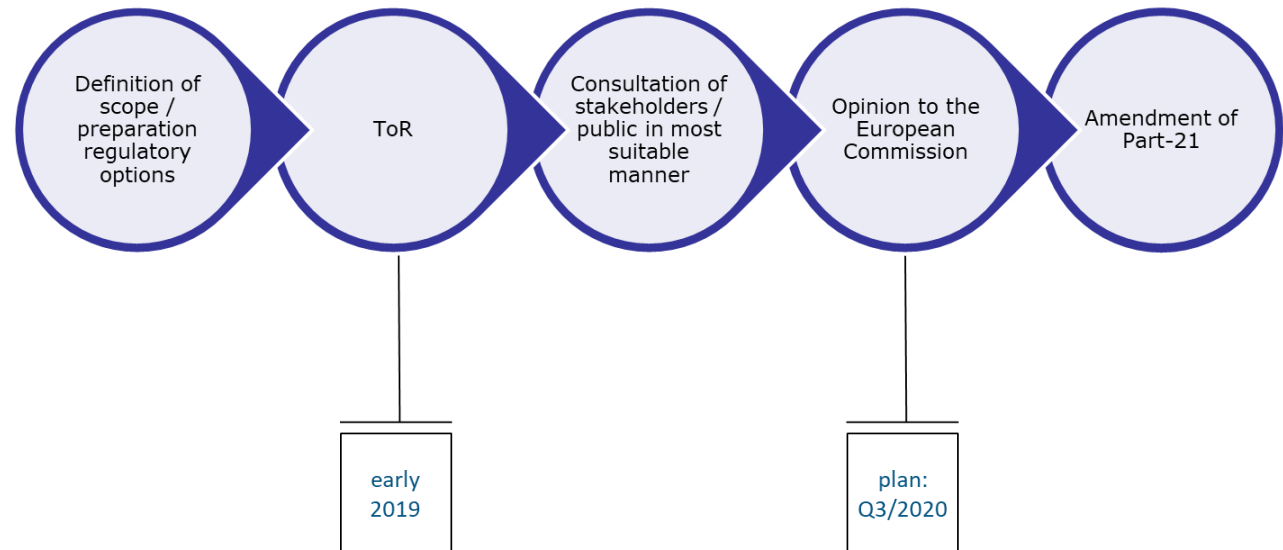
Controversial issues: the new LOI concept is sometimes perceived as an additional burden by the industry. The industry has also expressed some concerns on the process to obtain the new privileges.

AB position: ./.



■ RMT.0727 implementation of the NBR into Part 21

- GA proportionality
- A totally new concept is being developed (high level first) for discussion at AERO
- First workshop in the development of the concept, following article 16 procedure
- Scope similar to Part-ML
- Separate Part-21L



Thank you!