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| Title | Installation of parts and appliances that are released without an EASA Form 1 or equivalent |
| NPA Number | NPA 2017-19 |

UK CAA (European.Affairs@caa.co.uk) has placed **1** unique comments on this NPA:

| Cmt# | Segment description | Page | Comment | Attachments |
|------|---------------------|------|--|--|
| 302 | (General Comments) | 0 | <p>Overall comments</p> <p>1) We believe allowing parts affected by airworthiness requirements to be released and accepted onto aircraft with only commercial releases does not constitute a 'high and uniform' level of safety consistent with the Agency's mission – it is a considerable reduction below those levels previously established by the constituent NAAs of the EU member states without any justification or comprehensive mitigation.</p> <p>The major issue is with the classification of parts within the NPA. In order to ensure safety, those parts that are directly affected by the need to show compliance with airworthiness requirements (such as strength, flammability, crashworthiness etc.) should be supported by an Authorised Release Certificate/Airworthiness Approval Tag, in order to ensure conformity with the design data established by the design approval holder.</p> <p>2) The NPA proposes in 21.A.309 a 4 layer classification process which we consider is unnecessarily complex. During the recent excellent presentation by John Van Doeselaar from Airbus at the global aviation manufacturing meeting, a slide was presented (attached) that provides a clear approach to classifying risk that could be adapted to determine the level of assurance needed and thus the type of release required.</p> <p><u>Please see the attached slide</u></p> <p>The criticality axis shows three levels:- Critical, Loaded and Non-Loaded.</p> <p>Converting this approach into Part 21 release terms, could equate to:-</p> <p>Critical – Part21G + additional controls for critical parts in 21.A.139 b) 1) and 21.A.805 – i.e. EASA Form 1 + additional traceability/life information</p> <p>Loaded – Part 21G – normal Part 21 QMS controls and standard EASA Form 1</p> <p>Non-Loaded - Commercial parts for which an airworthiness release is not required.</p> <p>3) The 4th layer of the NPA (CL IV) proposes “documentation accompanying the part identifying the part and the manufacturer” i.e. not requiring any Certificate of Conformity at all. This is</p> | 20180322Attachr (111.1kb)  |

considerably below the levels currently required even for Standard Parts and below that required for installation onto aircraft in the Military sector in the United Kingdom. It is suggested that this is deleted, or in cases where truly commercial items without any conformity evidence are utilised in production or maintenance, it is stated that the means by which the POA holder/Maintenance Organisation can determine suitability for installation (such as flammability testing for commercial carpet, for example) must be defined in the instructions for continuing airworthiness produced by the Design Approval Holder.

The Rulemaking Group was provided with National Guidance Material established by several NAAs in dealing with commercial/role fits parts such as camera installations etc, the NPA does not show how these have been considered and addressed.

4) The basic conflict arises from Part 21 Subpart K requiring an EASA Form 1 for all parts installed on an aircraft other than Standard Parts, but GM to Part 21 Subpart G limiting eligibility for POA approval (and therefore ability to issue EASA Form 1s), excludes those organisations manufacturing parts identified in the design holder product support documentation as 'industry supply or no hazard'.

While this does not cause an issue in aircraft build, the fact that such parts were not initially supported by an EASA form 1 creates challenges during maintenance, unless the product support documentation is clear that a release is not required.

Please note: That since the initial release of JAR-21 in the 1990s, DOAs have already had the ability to identify those parts that do not require a Form 1 release and have generally not done so.

We believe the current approach set out in the NPA will not achieve its aims unless it is fully supported by the TC holders, there is the very real possibility that nothing will change for existing and future designs, as DOAs will simply specify Form 1s for all spare parts and the considerable work that has gone into the proposal will be wasted if it is not adopted in practice. Some further consideration should be given to addressing this apparent shortcoming.

5) We believe the Economic Impact statement on Page 27 that states that the effect is Zero or Minimal on the basis of a one-off activity to update procedures and templates is incorrect.

Firstly, there is a direct impact on NAAs that derive their income from the charging of fees. The eligibility of an applicant is significantly determined by the need to release an EASA Form 1 directly to end users. If the classification of parts requiring EASA Form 1 changes as proposed, then significantly less POAs will be required, which will have a direct and significant impact on income of affected NAAs and in some cases impact their ability to maintain the necessary resources to oversee remaining POAs.

Secondly, many POAs up to TC Holder level place reliance on the ability to obtain an EASA Form 1 from their supply chain, thereby alleviating the need to undertake supplier surveillance audits. With a significant reduction on the number of POAs, that burden of supplier surveillance will fall on the integrating POAs (i.e. Industry), with a significant increase in the expected levels of resource and associated

inspection/audit travel costs to maintain the expected level of control.

Neither of these impacts appear to have been quantified and evaluated.

During the Global Manufacturing meeting, the FAA (who are broadly supportive of the proposal at a Policy) observed the reduction of POAs would not be an issue for control as the NAAs could simply audit the supply chain as the FAA does with its PAHs. The question is, with what resource? With the reduction of income as from the reduction in the number of POAs, some NAAs may not be able to maintain staff numbers to undertake such a task. During the separate discussion, representatives of some of the smaller NAAs advised that the effect of this proposal could make them economically unviable.

6) With regard to Standard Parts and previous Agency discussions (SIB 2012-06R2 and Certification Memorandum on use of Standard Parts in Critical Installations), the NPA does not seem to address these areas. Indeed, the first impression is that Standard Parts could be considered as CI IV, in which case they would not even justify a Certificate of Conformity.

We note that M.A.501 states that "Standard Parts shall only be fitted when accompanied by evidence of conformity traceable to the applicable standard" which has been left unchanged from the existing rule. This would mean that all Standard Parts should be Class III, which leads to the question "What class of Part is CI IV actually likely to apply to?".

7) There are alleviations in place for sailplanes that provide a sensible fix for certain parts, it is not explained if this approach will be retained or why the concept could not be broadened to a larger group of General Aviation aircraft types.

8) The NPA only applies to new parts and will not apply to overhauled or repaired parts. This could result in parts that did not require a Form 1 needing to be provided with a Form 1 when the part is maintained in a workshop. It doesn't appear to be logical to apply the classification concept to new parts and not to refurbished or maintained parts.

The UK CAA is willing to expand further on our comments and to participate in any meeting arranged to further progress the content of this NPA.