



FUEL TANK SAFETY TRAINING SEMINAR

Operators views on EASA Decisions on FTS Training

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AGENDA



- **EASA Decisions & Explanatory Letter**
 - Implications
 - Problems
 - Concerns
- **European Operators view**
 - Familiarization (awareness) training
 - Continuation training
 - Operators compliance overview
- **Summary**

EASA Decisions- Implications



- **The decisions are AMC for part 66, part 145 and part M**
 - they are GUIDANCE material to the rule, no changes to the rule.
 - alternate MOC are acceptable.
- **Acceptable MOC include**
 - Computer based training.
 - Video / photo / diagrammatic examples of CDCCL's.
- **Acceptable compliance time**
 - Training Material Production: 9-12 months.
 - Initial training Completion: 1-3 years.
- **Two phase Training Requirements**
 - Familiarisation (Awareness) Training.
 - Continuation Training.

EASA Decisions - Problems



- **Minimum Initial Training**
 - Compliance time? decisions and letter imply immediate action.
 - What is acceptable minimum training? Info bulletin + MPD ?
- **Detailed Training Requires TC holder assistance**
 - Some TC holders have declined requests.
- **Operators have to construct their own training**
 - Wide variability across Europe.
- **Subject to NAA interpretations on what is required**
 - How to ensure homogeneous approval of training?
 - How are NAAs staff be trained? To which standard?
- **CDCCL compliance**
 - How do you show compliance to CDCCLs?
- **No guidance material for Part 21 training available.**
 - 145 Personnel must follow maintenance data;
 - Part 21 Personnel can make changes.

EASA Decisions- Concerns



- **Single source of clarification from EASA**
 - Rule – Decision - Letter – FAQ
- **Agency Decisions are not subject to the NPA process**
 - however their implications are potentially high for operators.
 - Consultation with affected stakeholders is essential.
- **The decisions mention specific maintenance practices (i.e. CDCCL's)**
 - Information of this type belongs in maintenance data and not in AMC.
- **EASA guidance to NAA's essential to ensure uniform compliance**
 - Interpretation from the different NAAs of the Decisions
 - Findings have been raised against some operators in NAA / 3rd party audits regarding the published material.
- **Risk of over emphasis on FTS in training and maintenance data**
 - Other significant safety areas are not as prominent e.g. EZAP, CPCP, ALI, MRB CAT 5,8 tasks etc..
- **References (factor of safety('10-6 to 10-9')**
 - this data has not been substantiated.

Familiarisation Training



- **Minimum Knowledge ensured**
 - European operators have to include the last version of the MPD (includes the CDCCLs);
- **Revision of Maintenance Organization Manual.**
 - Maintenance Instructions regarding the operation of fuel pumps
 - Information on the introduction of CDCCL items in Maintenance Programme and Aircraft Maintenance Manuals
 - Aircraft type related 'Operator Engineering Information' have been published to explain the changes in MPD, purpose and details of the CDCCL's
 - The CDCCL's were added in all based work instructions, as were added to different Manuals (AMM, CMM, etc) by aircraft TC holders.
- **Familiarization Training Courses**
 - During continuation training to Certifying Staff .
 - Computer based training.

Familiarisation (Awareness) Training



■ Example of Familiarisation Training Syllabus

- Background
- Historical development of regulations regarding FTS
- Fire chemistry /physics (flammability & ignition)
- Instruction for continuing airworthiness for Operator fleet
- Impact on maintenance program
- Examples of hazards
- Ignition source Prevention
- Flammability Reduction
- Safety precautions

Continuation Training



- **Expectations from Operators**
 - support from TC holders
 - flexibility
 - time to comply
 - guidance from EASA
 - standardization of minimum requirements

Operators Compliance Overview



- **CDCCLs in MPD**
 - Is mandatory, and already performed.
- **Familiarization (Awareness) training: Different levels of compliance**
 - Informative activities – raise awareness.
 - Information bulletins.
 - JAA training .
 - Formal familiarization training – approved syllabus.
- **Continuation Training**
 - Most operators developing computer based trainings.
 - Compliance time expected 1-3 years.

European operators are doing their outmost to comply with the regulation, to ensure the highest level of safety

SUMMARY



- **Operators are compliant with EASA decisions**
 - Familiarization (Awareness) training.
 - Continuation training.
- **Specialist assistance from TC holder is needed**
- **Minimum training should be standardized**
- **Homogeneous implementation across Europe is essential**
 - Interpretation by NAAs and by Operators.
 - AMC and Acceptable MOC.
 - Compliance times.
- **Better industry consultation is required for similar provisions**
 - NPA process.
 - Maintenance practices not in AMC.

EASA guidance is essential to ensure the homogeneous implementation of the decisions in EU





Thanks for your Attention

➤ Any Questions?

AEA - the Association of European Airlines - brings together 31 major airlines, and has been the trusted voice of the European airline industry for over 50 years.