



## **MINUTES OF WORKSHOP**

**Subject** Instructions for Continued Airworthiness Workshop (MDM.056 ICA)  
**Date** 19 January 2010  
**Location** Jugendherberge, Cologne

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#### **Related Links/ Documents:**

1. Ref 1. MDM.056 TOR
2. Ref 2. MDM.056 Group Composition
3. Ref 3. List of participants
4. Ref 4. Agenda and speakers
5. Ref 5. Presentation "Introduction of the rulemaking task MDM.056"
6. Ref 6. Presentation "Coordination with authorities"
7. Ref 7. Presentation "What are ICAs"
8. Ref 8. Presentation "Approval status of ICA"
9. Ref 9. Presentation "MRB process / ICA"
10. Ref 10. Presentation "DOA and AP-DOA"
11. Ref 11. Presentation "When and to whom do ICA need to be available"
12. Ref 12. Presentation "Use of ICA"

#### **MoM Distribution:**

To all the participants  
Published on EASA website

## I. EXECUTIVE SUMMARY

### 1. Background

#### **Background of task MDM.056**

A decision to initiate a rulemaking task was taken in 2008 due to implementation problems identified in Instructions for Continued Airworthiness. The task created is MDM.056.

The Terms Of Reference (TOR) of the task were published on 28 September 2009 (see ref. 1).

The objective of the task, as described in TOR MDM.056, is to improve the provisions in the Certification Specifications (CSs), Implementing Rules Regulation (EC) No 1702/2003 and Regulation (EC) No 2042/2003, AMC and GM in a consistent way in order to establish clear requirements and responsibilities for all parties involved in the production of ICA, their approval and their implementation.

#### **Scope of the task MDM.056:**

This rulemaking task may affect:

- All Certification Specifications (CS): CS-22, CS-23, CS-25, CS-27, CS-29, CS-31, CS-APU, CS-E, CS-ETSO, CS-P, CS-VLA, CS-VLR.
- 1702/2003 dealing with design and production (this includes Part 21)
- 2042/2003 dealing with maintenance (this includes Part M and Part 145)
- And all associated AMC/GM

#### **Status of task MDM.056**

A drafting group was set up following SSCC/AGNA consultation as per our standard rulemaking procedure (the Safety Standards Consultative Committee (SSCC) and the Advisory Group of National Authorities (AGNA) provide the Agency with a forum for consultation of interested parties and national authorities on all aspects of the rulemaking process).

The drafting group is made of people from Authorities (EASA – European Aviation Safety Agency, FAA – Federal Aviation Administration, TCCA – Transport Canada Civil Aviation, NAA – National Aviation Authorities), European and US manufacturers as well as one representative of operator and general aviation.

Refer to Group composition in ref. 2.

The first meeting of the drafting group (Kick off meeting) took place on 8<sup>th</sup> of December 2009. Next meetings will take place in March and June.

The date of delivery for the opinion/decision issuance is foreseen in 2012.

#### **Reasons for a workshop**

The scope of the TOR as written is very broad and needs to be refined. Particularly, the Agency wanted to establish via this workshop that:

- the questions raised in the TOR tackle all the key issues
- all the concerns of the industry/NAAs have been identified and have been understood by the drafting group.

### 2. Conduct of the workshop

The workshop took place in Cologne at the Jugendherberge from 9.30 to 16.30.

There were 125 participants and 9 speakers. 29 requests for registration could not be accommodated due to the size of the room.

Please refer to [ref.3 \(list of participants\)](#).

The speakers were the following:

- Yves Morier, EASA Rulemaking Directorate, Head of Product Safety
- Peter Corbeel, EASA Rulemaking Directorate, Initial Airworthiness Manager
- Scott Geddie, FAA, AIR-140 - Airworthiness Programs
- Markus Janischowsky, EASA Certification Directorate, ICA focal point
- Pascal Lair, EASA Certification Directorate, Project Certification Manager Propulsion
- Olivier Robelin, EASA Certification Directorate, Maintenance Review Board Expert
- Alexandru Enache, EASA Approvals & Standardisation Directorate, DOA team leader
- Steve Dowling, Boeing, ICA Quality Assurance
- Juan Anton, EASA Rulemaking Directorate, Continuing Airworthiness Manager

The workshop was organized in sessions per TOR subject. Each session was opened with a short presentation and followed by an open discussion.

Following subjects were discussed (please refer to the [agenda](#) in [ref. 4](#)):

- Coordination / cooperation with other authorities
- What are ICA?
- Approval status of ICA- Level of Agency verification/approval
- How does the MRB (Maintenance Review Board) process fit in the approval/acceptance of ICA?
- Role of DOA (Design Organisation Approval) and Alternative Procedure-DOA (AP-DOA): privileges for ICA issuance and approval
- When do ICA need to be available? To whom should ICA be made available?
- Use of ICAs and other maintenance data by operators / MROs (Maintenance and Repair Organisations)

The [presentations](#) given are also enclosed ([ref. 5 to 12](#)).

### **3. Conclusions of the workshop**

#### **General:**

- The initiative for the workshop and the commitment to work jointly with FAA and TCCA was appreciated by the participants
- There is still a need to ensure that the drafting group composition is adequate to the scope of the task. The drafting group shall consider involvement of airlines, general aviation, maintenance organisations and manufacturers of small/business aircraft.

#### **Main areas of concern:**

All the following comments were the main ones raised by stakeholders who require clarifications on the related subjects. Those comments do not represent any conclusion or any EASA position. They only express some concerns and points of view of participants.

ICA definition:

- Following manuals/instructions were discussed thoroughly and require a specific review by

the drafting group regarding their status as ICA, their level of acceptance/approval: CMM (Component Maintenance Manual); IPC (Illustrated Parts Catalogue) , Service Bulletins (particularly concerning the compliance with Part M.A.302), MRB, ALS (Airworthiness Limitations Section), AMM(Aircraft Maintenance Manual), ADs (Airworthiness Directives)

- Difficulty of the operator to identify the full picture of applicable ICA

#### General rules:

- Impact of any possible rule changes on existing fleets/legacy issue
- Rules shall be proportionate. Care shall be given to GA (General Aviation)
- The meaning of approved/accepted shall be clarified. Clarification should be given on what is mandatory and non mandatory and right balance should be found. Instructions safety related and non safety related shall be distinguished and clear identification should be done accordingly. In addition, the terminology used should be clarified: "approved data", "ICA", "maintenance data", "maintenance instructions"
- A glossary would be appreciated
- Human factors to be considered

#### DOA side:

- Considerations to be given to DOAs for changes in ICA only
- Review of DOA privileges is needed

#### Operators/MROs side:

- Guidance on Part M.A.302 is needed about the requirement for operators/MROs to take into account ICA changes introduced by manufacturers.
- How to accept alternative instructions developed by the operators/maintenance. Is feedback needed to DAH (Design Approval Holder)?
- Guidance on one time inspection is needed (replacement of JAA leaflet 26)

### **Way forward**

All the points discussed here above will be reviewed by the drafting group.

Any further question/comment is welcome and will also be considered by the drafting group.

Further workshops will be organized:

- when first ideas for rule changes are developed
- to share information and collect comments/feedback

The drafting group composition will be reviewed and discussed within the drafting group at next meetings. Operators/MRO should join and the way additional manufacturers could be involved will be investigated further.

The organisation of the drafting group will also be defined at a later stage. It is envisioned that subgroups are created to focus on dedicated subjects.

## II. RECORD OF DISCUSSIONS

### 4. Opening of the meeting and welcome speech

*Presented by: Yves Morier, EASA Rulemaking Directorate, Head of Product Safety*

Mr Morier welcomed the participants and pointed out the high number of participants which is a sign of the great interest of stakeholders in the ICA.

Mr Morier apologized for those who could not participate due to the fact that the room could not accommodate the number of requests.

Mr Morier indicated that all the presentations as well as minutes of this workshop will be posted on the website.

He invited also all participants to send all inputs related to ICA to EASA for further consideration.

### 5. Introduction of the rulemaking task MDM.056

*Presented by: Peter Corbeel, EASA Rulemaking Directorate, Initial Airworthiness Manager*

The material given in reference 3 was presented to the audience.

The objective of the workshop was given, highlighting the need to precise the Term of Reference of the task MDM.056 in order to ensure the right issues are tackled by the drafting group.

Mr Corbeel indicated that the composition of the drafting group is still under discussion to ensure all areas of the tasks are appropriately covered by the expertise in the drafting group.

In addition, a decision might be taken to create subgroups in order to cover all categories of products (equipment, General aviation, Large aeroplanes...) and ensure that the rules will be proportionate.

Mr Corbeel also pointed out that additional workshops will be organized during the development of the task in order to share the results of the drafting group and collect the view of all stakeholders.

### 6. Coordination/ cooperation with other authorities

*Presented by: Scott Geddie, FAA AIR-140- Airworthiness Programs*

The material given in reference 4 was presented to the audience.

The FAA confirmed the need for harmonisation with EASA and will consider the result of the rulemaking task MDM.056.

Particularly, the FAA order 8110.54 will take into account EASA comments.

### 7. What are ICAs

*Presented by: Markus Janischowsky, EASA Certification Directorate, ICA focal point*

The material given in reference 5 was presented to the audience.

There is no definitive answer to this question yet.

Comments were received from ARSA (Aeronautical Repair Station Association), Dutch CAA, GAMA (General Aviation Manufacturers Association), Dassault Aviation on the specific status of

CMMs (Component Maintenance Manual): Can we consider CMM as ICA? Who is responsible for CMMs? Vendors or aircraft manufacturers?

SB (Service Bulletin) case was also raised by Dutch CAA as they may contain ICA. Reference was also given to AD (Airworthiness Directive) versus Part M.302: In which cases will the Agency issue an AD to mandate an SB and in which cases will it rely on the implementation scheme through Part M?

GAMA highlighted the fact that the scope of the task is very large. Additional experts might be needed to ensure all products are adequately dealt with.

Boeing underlined that the drafting group should address the case of the existing fleet and recommended the TOR to include this aspect.

Austrian Airlines emphasized the difficulty airlines face in getting a full picture of the ICA. There is often a need to dig into a high number of manuals such as WDM (Wiring Diagram Manual), ELA (Electrical Load Analysis), CMM...They would prefer one source of information.

In addition, in dealing with TC (Type Certificate) and STC (Supplemental Type Certificate), it was recommended that ICA are consistently considered in terms of ICA requirements by TCH (TC Holder) and STCH (STC Holder).

Eurocopter emphasized the need to have guidance on the requirement so that ICA is easy to use and to understand.

Finally, Austrian Airlines highlighted that ICA shall be such that airlines should not need to develop their own instructions.

## **8. Approval status of ICA – Level of Agency verification/approval**

*Presented by: Pascal Lair, EASA Certification Directorate, Project Certification Manager Propulsion*

The material given in reference 6 was presented to the audience.

TCCA requested that the CMP (Configuration, Maintenance and Procedures) document for ETOPS be considered for the ICA review.

KLM, BAE and Cargolux raised their concern on repairs.

ICAs associated with repairs and responsibility of the DAH (Design Approval Holder) were discussed. The fact that repairs are less and less covered by the Manuals was also noticed.

A clarification was requested on the classification of a repair affecting the ICA. According to the current guidance, it was understood that any repair impacting the ICA is classified as major.

The case of a DOH (Design Organisation Holder) wishing to modify the ICA related to a design that they do not hold was mentioned: Could there be a privilege for minor change to ICA?

Then, there were some discussions on ICA versus TD (Type Design): are ICA part of TD? If so, is a change to ICA considered as change to TC (Type Certificate)?

European Sailplane Manufacturers Association asked the drafting group to consider the level of verification of NAAs (National Aviation Authorities) concerning the AMP (Approved Maintenance Programme). The procedures should be harmonized and special care shall be given to small aviation. It was pointed out that General Aviation structures are very different from CAT (Commercial Air Transportation). Regulations shall ensure there is no "One size fits all".

The Agency reminded the assembly that there are regulation alleviations in the field of GA (General Aviation) concerning the Maintenance Programme.

TCCA emphasized that good level of flexibility shall be given to DAH.

## **9. How does the MRB process fit in the approval/acceptance of ICA?**

*Presented by: Olivier Robelin, EASA Certification Directorate, MRB expert*

The material given in reference 7 was presented to the audience.

It was reminded that MRB is a means of compliance with CS and that it is not a mandatory process.

UKCAA mentioned that aircraft changes can be covered by MRBR and there are existing cases where the methodology was adapted to STC.

In the case of legacy aircraft, that had an MRB using MSG-2, how are changes to such MRBR handled?

EASA mentioned that in case of change to the TC, the CPR (Changed Product Rules) apply, and this determines the applicability of the methodology to be used to develop the associated Maintenance Schedule.

Virgin Atlantic Airways stressed that it is a real challenge for operators to collect relevant information to elaborate the Maintenance Schedule. It is not worth regulating ICA on the Part 21 side if use of ICA is not facilitated.

The Agency recognized that operators and MRO (Maintenance and Repair Organisations) are not represented enough in the MDM.056 group and assured again the importance of the use of ICA.

Fokker made reference to the ICA on EWIS (Electrical wiring interconnection system) and mentioned the "double" route for approval through certification process and MRB process.

The Agency recognized that coordination shall be improved for the EWIS subject.

Clarification was given by the Agency about ALS (Airworthiness Limitation Section): Those tasks are not the result of a "MSG3" (Maintenance Steering Group) approach and can not be included in the MRB.

It was also highlighted by a participant that MRBR contains safety and non safety tasks. Should we clearly separate the approved /non approved tasks?

An additional concern was raised about the involvement of PCM. Consistency was requested for initial projects such as TC and "current process" such as changes to TC.

Human Factors should also be considered for the ICA issuance.

## **10. Role of DOA and AP DOA: privileges for ICAs issuance and approval**

*Presented by: Alexandru Enache, EASA Approvals and Standardisation Directorate, DOA team leader*

The material given in reference 8 was presented to the audience.

Dassault Aviation expressed their concern on the ICA approval. Their process to ensure that ICA are available at EIS (Entry Into Service) of the aeroplane was presented. Dassault-Aviation also explained that their current structure could allow them to approve their ICA under DOA. The idea for DOAs to have more authority on ICA issuance was mentioned by Dassault Aviation, including the case of MRB and minor change to ALS. The idea of a privilege for vendors to issue CMM was also mentioned.

Boeing and ARSA discussed on the meaning of "accepted by"/ "accepted to" /"approved". Boeing refers to ICA as being "recommendations" which suggests that they can always be deviated from. It was suggested that legally speaking, "approved by" and "accepted by" are equivalent.

There were discussions on the approvals granted by TC holders to operators to deviate from ICA. It was requested whether the rulemaking task will cover this aspect.

The question was raised what would happen with ICA responsibilities in case of "orphan" aircraft (aircraft without TC holder).

Finally, a clarification was requested on the differences between DOA and AP DOA in terms of privileges.

## **11. When do ICA need to be available? To whom should ICA be available?**

*Presented by: Steve Dowling, Boeing, ICA quality assurance*

The material given in reference 9 was presented to the audience.

Discussions took place with KLM, Cargolux, Boeing, and ARSA on the definition of ICA.

Clarification was requested on the ICA with regards to TC: If ICA are required for TC, does it mean that they are part of TC?

The idea to have for each product an index defining the ICA was mentioned.

Specific manuals were discussed, for instance MPD, AMM... so as to know if they are considered as ICA. It was concluded that the definition of ICA content is today defined by the DAH together with the Certification Authorities at time of certification of the product.

A robust process is requested to ensure operators/MRO can have the ICA on time.

Dassault Aviation made reference to the other rulemaking task 21.039 and OSD (Operational Suitability Data) and requested the drafting group consider this task, particularly concerning the training syllabus.

## **12. Use of ICA and other maintenance data by operators / MROs**

*Presented by: Juan Anton, EASA Rulemaking Directorate, Continued Airworthiness Manager*

The material given in reference 10 was presented to the audience.

Consideration is requested concerning Part MA.302.

The applicable ICA as defined in Part M and AMC is not consistent and the rules are not equivalent in the EASA and in the FAA systems.

The AD issuance was questioned with regards to ALS applicable at the latest amendment: The Agency recognized the duplication of tasks when issuing an AD on amended ALS. It was reminded that ADs are issued to comply with ICAO standards (Airworthiness Directives shall be communicated to Member states).

Virgin Atlantic mentioned the case of the feedback to the TCH when encountering a problem with ICA provided. Question was asked whether it was mandatory to notify the DAH. What if the notification concerns only "economical" improvement?

Some participants expressed their view, stating that DAH should be aware of any ICA change to ensure safety.

It was mentioned that Part 145 organisations are required to report wrong data whereas Part 21 organisations are not required to deal with this report.

There should be a clear responsibility for TC holders to react to identified deficiencies in the ICA.

A question was raised on the possible retro-active effect of changes to ICA.

The Agency underlined that NAAs approve the procedures for airlines to modify the Maintenance instructions.

More guidance was requested on

- how to perform a one-time extension?
- which data can be modified by the operator/MRO?
- how to revise IPC (Illustrated Parts Catalogue)/ parts catalogue?
- how to translate the maintenance data into job cards? Can job cards be standardized?

Eurocopter recommended using internationally recognized standards such as ATA100 in establishing the job cards.

There were debates between ARSA, Dutch CAA and EASA on availability of ICA to operators without appropriate capability. It was reminded that in any case access to ICA can not be negated to the operators/MRO and it is not TC holder's responsibility to control the capability of MROs with regards to ICAs.

A question was raised about IPC status: Is IPC considered as ICA? There seems to be an inconsistency between Part M and AMC.

DAH were requested to give their position about the possibility operators have to deviate from ICA.

ARSA, Rolls Royce and Boeing pointed out that there are approved procedures at the operator's side to modify ICAs. In addition, it was pointed out that operators often need to modify ICA based on their operational environment and use.

A debate took place about the need for DAH to be aware of ICA changes performed by the operators.

Dutch CAA emphasized again that TC holder shall clearly identify ICA linked to safety. According to them, only those ones could be approved. The approval by NAAs for non safety tasks was questioned. Dutch CAA proposed that operators could be able to escalate "economical task" without NAA approval.

### **13. Summary and conclusion**

*Presented by: Yves Morier, EASA Rulemaking Directorate, Head of Product Safety*

The Agency highlighted that there is no difference between Continued Airworthiness and Continuing Airworthiness.

Dassault Aviation mentioned the fees and charges policy for MRB and asked about the possibility to include them in the overall DAH fees.

Following participants intervened for conclusion: Dassault Aviation, Virgin Atlantic Airways, ARSA, Dutch CAA .

Dassault Aviation requested for clarification on which ICA are mandatory and how to identify them (should they be tagged as critical?).

They also mentioned the fees and charges policy for MRB and asked about the possibility to include them in the overall DAH fees.

Virgin Atlantic requested clarification on the use of the terms "approved data", "ICA", "maintenance data", "maintenance instructions" and requested for definitions

ARSA requested for a policy to be developed in a first step and highlighted again the case of the component ICA

Dutch CAA highlighted that a distinction shall be done between the instructions that are safety related and the ones economically driven.

Yves Morier concluded with the following points:

- The initiative for the workshop and the commitment to work jointly with FAA and TCCA was appreciated by the participants
- Any question after the workshop will be welcome and taken into account by the drafting group.
- There is still a need to ensure the drafting group composition is adequate to the scope of the task.
- Main subjects of concern by the participants are the following ones:
  - Drafting Group composition in relation to the scope
  - CMM; IPC
  - SBs with regards to Part M.302
  - Impact on existing fleets/legacy issue
  - Rules shall be proportionate. Care shall be given to GA (General Aviation)
  - Difficulty of the operator to have the full picture of applicable ICA
  - Consistency between certification process and MRB process
  - Human factors to be considered
  - Considerations to be given to DOAs for changes in ICA only
  - Review of DOA privileges is needed
- The meaning of approved/accepted shall be clarified. Right balance should be found between what is mandatory and non mandatory. A robust process is needed.
- Guidance on Part M.A.302 is needed about the requirement for operators/MROs to take

- into account ICA changes introduced by manufacturers.
- How to accept alternative instructions developed by the operators/maintenance. Is feedback needed to DAH?
  - Guidance on one time inspection is needed
  - A glossary would be needed

As a conclusion, Yves Morier informed the participants that all the points discussed will be reviewed by the drafting group.

The first step of the drafting group will be to develop a high level policy on ICA. The impact of this policy will be passed to the fees and charges department.

The meeting was very fruitful, all the speakers as well as the attendants were thanked for their active participation.

The meeting closed at 16.30.