

2019 IMRBPB Meeting Summary

6th to 10th May 2019

Ottawa, Canada, hosted by Transport Canada Civil Aviation (TCCA)

1. Reference

Pre-meeting package can be downloaded from the IMRBPB website:

<https://www.easa.europa.eu/newsroom-and-events/events/imrbpb-meeting-2019>

Note: In this document, “MPIG” = “MPIG + RMPiG” unless otherwise specified.

2. Attendance List

<i>Organization</i>	<i>Name</i>
ANAC	Fernando LACERDA
CAAC	WANG Jin
CAAC	FAN Jingzhu
CAAC	LI Xiaolei
CAAC	SUN Bin
CAAS	Gerald POH Hock Guan
CASA	<i>Absent with apologies</i>
EASA	Raffaele IOVINELLA (Acting Chairperson)
EASA	Frederic GASZTOWTT
EASA/OSAC	Dominique DUMORTIER
FAA	William (Bill) HELIKER
FAA	Rocky JOHNSON
GCAA	Hatem DIBIAN
GCAA	Zaved BANAFI
HKCAD	Jimmy LEUNG (Secretary)
JCAB	YOSHIDA Masao
JCAB	FUKUYAMA Hiroki
JCAB	FUNAHASHI Yoshifuru
TCCA	Jeff PHIPPS
TCCA	Ryan HENNIGAR
TCCA	Mathieu PARÉ
TCCA	Ben SIEBARTH



TCCA	Jeff MARTIN
328 Support Services	Markus KOCHS-KAMPER
A4A	Mark LOPEZ
Aeronovo	Manny GDALAVITCH
Airbus Canada	Mokhtar BOUZEGHOUB
Airbus Canada	Jean-Pierre GÉLINAS
Airbus Commercial	Oliver WEISS
Airbus Commercial	Tony HARBOTTLE
Airbus Helicopters	Élodie CARMONA
Airbus Defence and Space	Pilar ROJAS-BARCI
Air Canada	LI Yong
Air Canada	Yves MORIN
Air-Zermatt	Christof KALBERMATTER
American Airlines	Avril BENSON
American Airlines	Edwin DAVIS
ANA	MATSUBARA Hideaki
ATR	Ana-Maria PIVNICERU
Bell Helicopter	Hamid NOURI
Boeing	Kayode ARIWODOLA
Boeing	Kupp SRIDHAR
Bombardier	Alessandra BATALHA
Bombardier	Peter OSBORNE
Bombardier	Chantal LABELLE
China Aviation Industry General Aircrafts Co., Ltd	HU Yuqiang
China Aviation Industry General Aircrafts Co., Ltd	LI Yang
Dassault-Aviation	Laurent BOYER
Embraer	Pedro Augusto de Silva ALVES
Gulfstream Aerospace LP	Jeffrey POULIOT
Gulfstream Aerospace LP	Armando CHIEFFI
Hexagon US Federal	Kent BOLL
Hexagon US Federal	Terry THOMAS
IATA	Dragos BUDEANU
JetBlue Airways	William MERCIER
Lockheed Martin	Keith WELLS
Lockheed Martin	Ty PEACE
Safran Aircraft Engines	Philippe GALOZIO
SeaTec	Ron LITTLE
Sukhoi	Andrey SHUMILOV
Sukhoi	Elizaveth SHIPENKO
United Airlines	Jason ONORATI



3. IMRBPB Chairperson / Co-chairperson / Secretary Membership

- 3.1 Mr Raffaele IOVINELLA took up the position of Chairperson for the 2019 IMRBPB Meeting due to the unavailability of Mr Richard Todd PERRY.
- 3.2 Mr William (Bill) HELIKER was elected as the Chairperson effective after the 2019 IMRBPB Meeting till 2021.
- 3.3 Mr Raffaele IOVINELLA will resume the position of Co-chairperson after the 2019 IMRBPB Meeting till 2021.
- 3.4 Mr Jimmy LEUNG continued with the position of Secretary for 2019 till 2021.
- 3.5 Mr Bill HELIKER will provide invitation letter for GCAA of UAE to become a member of IMRBPB.
Post Meeting Note: Invitation letter dated 20 May 2019 was issued.

4. Updates on MPIG / RMPiG

MPIG and RMPiG provided updates on their respective activities in 2018 and 2019.

5. 2018 IMRBPB Minutes of Meeting

2018 IMRBPB Minutes of Meeting was accepted.

6. Candidate Issue Papers

6.1	CIP EASA-2019-01	Updated definition of “Adverse Effect on Safety”
	CIP disposition	CIP not accepted. EASA withdrawn this CIP and would propose in future if needed.
	CIP presented by EASA. <u>MPIG</u> Wish to understand if this CIP is related to EASA Certification Memorandum CM-21.A-A-001 Issue 1, <i>Parts Detached from Aeroplanes</i> .	



	<p><u>EASA</u> This CIP is not linked to the mentioned EASA CM.</p> <p><u>MPIG</u> MPIG does not support this CIP. EASA CM-21.A-A-001 Issue 1 indicated that there are no unsafe conditions. The CIP proposal does not consider human factor issue as applied via AMM procedures. The proposal also alters the concepts of the MSG-3 document by expanding the scope which is not reflected in the CIP.</p> <p><u>IMRBPB</u> After the caucus, there is no full consensus within IMRBPB members on this CIP.</p>
6.2	<p>CIP EASA-2019-02 Updated definition of “Operating” in MSG-3</p>
	<p>CIP disposition CIP accepted as IP 186 after being reworked by the attendees during the meeting.</p>
	<p>CIP presented by EASA.</p> <p><u>IMRBPB</u> The CIP content is slightly amended after the caucus, such as operating instead of operation. The impact on MSG-3 Structure Section was also reviewed during the caucus in which operating is only referred to environment and has nothing to do with the intent of this CIP.</p> <p><u>MPIG</u> Agrees with the proposal with suggestions in removing the reference to business jet and certain minor changes proposed by MPIG.</p>
6.3	<p>CIP EASA-2019-03 Application of IPs</p>
	<p>CIP disposition CIP accepted as IP 187 after being reworked by the attendees during the meeting.</p>
	<p>CIP presented by EASA.</p> <p><u>IMRBPB</u> This CIP was originally presented with the title “Temporary Application of IPs” but it is re-titled as “Application of IPs” during the meeting.</p> <p><u>MPIG</u> MPIG submitted a similar CIP (CIP IND-2019-04-R2) and suggested these two CIPs to be considered / discussed together to the effect that only one CIP proposal will be selected.</p>



Suggestions to this CIP have been sent to IMRBPB during the meeting.

Would a two-year revision cycle of MSG-3 document / IMPS allow quicker adoption of IP?

IMRBPB

Reviewed the suggestions by MPIG and incorporated some but not all.

This CIP would allow more timely application of IP as it provided step-by-step implementation of IP.

The concept of the “IP Effective Date”, which is normally 60 days after the initial date of the IP unless otherwise determined, is discussed and agreed. IP Template and IP Management Procedure will be amended accordingly.

IMRBPB agreed that on the nature of IP retroactivity, the implementation on retroactivity as required by an IP may be only on PPH level during the Periodic Review of MRB Report, not on individual analysis level which could be subsequently performed.

MPIG

MPIG does not agree 100% with this CIP on its retroactivity nature. Bombardier may come up with suggestions in future IMRBPB meeting.

IMRBPB

Should MPIG consider some current IPs that may be affected by this CIP/IP, IMRBPB would not object to future CIP that may be further developed to make better the implementation of existing IP.

Post Meeting Note: Revised IP Template (Rev 6, 9th May 2019) and IP Management Procedure (Rev 7, 15th May 2019) were issued to describe the concept of “IP Effective Date”.

6.4 **CIP EASA-2019-04** **IMRBPB participation**

CIP disposition **CIP not accepted.**

CIP presented by EASA.

MPIG

CIPs submitted by MPIG are proposed by individual MPIG members and discussed within MPIG. They may include IATA, experienced industry specialists in the form of consultancy firms and new operators who may not actively participate in a current MRB/MTB process.



	<u>IMRBPB</u>	MPIG's comments are reviewed. CIP not accepted. However, IP Management Procedures are in place where CIP should be submitted and stated as MPIG or RMPIG CIP.
6.5	CIP EASA-2019-05	Analysis of bonding devices in MSG-3
	CIP disposition	CIP returned to the originator for additional work, information or justifications for re-submit in 2020. IMRBPB requested MPIG to provide comments to support the enhancement on this CIP.
	CIP presented by EASA.	
	<u>MPIG</u>	Should all bonding jumpers / leads be analysed under L-HIRF, the requirements for bonding jumpers / leads to be analysed under EWIS should also be reviewed and removed where necessary. Currently EWIS has driven a lot of Zonal tasks purely on bonding jumpers / leads. Though there was a major re-write of the L-HIRF section in MSG-3 rev. 2013. MPIG wants to understand if this CIP is based on MSG-3 rev. 2013 or MSG-3 rev. 2018 with regard to critical system.
	<u>IMRBPB</u>	This CIP's concept is agreed by IMRBPB but enhancement is needed. MPIG requested to provide comments and send to IMRBPB. CIP will be re-submitted in 2020.
6.6	CIP EASA-2019-06	Letter of Information for projects under Bilateral Agreements
	CIP disposition	CIP returned to the originator for additional work, information or justifications. EASA to review the CIP with FAA and TCCA and may come up with further proposal in 2020.
	CIP presented by EASA.	
	<u>MPIG</u>	This CIP directly affects the IMRBPB member authorities and the discussion / outcome should not have any major effect on the MPIG. However, MPIG would like to understand more on the roles of CA and VA in a MRB process, such as the VA comments would be communicated directly, or via CA, to TCH?



	<u>IMRBPB</u> Three IMRBPB member authorities are affected by TIP (or IPA) and Bilateral Agreements. EASA to take action to create a Working Group dedicated to Bilateral discussions with FAA and TCCA. The outcome of this WG may be a new submission of the CIP by 2020.
6.7	CIP FAA-2019-01 Calendar Clock Stoppage and Calendar (Time) Interval
	CIP disposition CIP returned to the originator for additional work, information or justifications. FAA to review IP 123 and IMPS 5.9 and may come up with further proposal in 2020.
	CIP was presented by FAA. <u>MPIG</u> Operators are aware that there should be no clock stoppage per MSG-3 logic. MPIG does not agree that the MSG-3 document is the proper place for this recommendation as this is occurring in-service. IP 123 is a similar (in operation) proposal and incorporated into IMPS, which may be the more appropriate place to include proposal mentioned in this CIP. This is a subject that is applicable to an operator and NAA and again is not a MSG-3 activity. <u>IMRBPB</u> CIP's intent is already covered by IP123 and IMPS 5.9. FAA to take action to review IP123 and IMPS 5.9 and may come up with further proposal in 2020.
6.8	CIP FAA-2019-02 Candidate CMR's (CCMR) dispositioned using MSG/MRBR Tasks
	CIP disposition CIP not accepted. Two action items are identified.
	CIP was presented by FAA. <u>MPIG</u> Different methods are using by different TCH on CCMR disposition, especially on tagging of CCMR. <u>IMRBPB</u> The coverage of CCMRs by MRBR tasks was already thoroughly discussed in the past and superseded by the direction given by the RMT.0252 Subtask 5, resulting in the



publication of the new EASA AMC 25-19 into CS-25 Amendment 20. However, the current FAA and TCCA guidance materials are not yet in line with the guidelines agreed at RMT.0252 Subtask 5.

TCCA has taken an action to bring this issue at CMT level in order to push the alignment of all the guidance materials as per RMT.0252 Subtask 5 decision.

MPIG

MPIG to take action to propose a new CIP to update MSG-3 to the current EASA AMC 25-19 on CMCC process, especially on tagging of CCMR tasks.

6.9 **CIP IND-2018-04 R2** **SSI boundary determination guideline**

CIP disposition **CIP returned to the originator for additional work, information or justifications.**

CIP presented by Bell Helicopter.

IMRBPB

Inquired if the purpose of the CIP was to harmonize SSI’s amongst all TCHs.

MPIG

CIP’s main goal is not on harmonization, rather to prevent deviations during decision making and to assist the MSG-3 structural analysts in identifying the boundaries in a correct manner. It is limited to the definition of the SSI and differentiated by Other Structural Items (OSIs) and PSEs.

IMRBPB

The format of the CIP should change. A list with bullet points may send the wrong message to the audience that the items to consider are limited to the list. It should be kept as guidelines for help not solid list to implement. In addition, PSE listed in the list but how about other elements of SSI which are not necessarily PSEs?

The idea of “highest manageable level” offered by the CIP for SSIs is new and supported by the IMRBPB. However, this idea requires more expansion and explanation along with examples.

IMRBPB suggests MSI similar idea to be considered.

EASA structures experts (Frederic / Ralf) are willing to participate in WebEx meetings and / or review the outcome CIP of WebEx meetings.

Efficient tasking should not be the main goal of the CIP, but efficient MSG-3 analysis should be.



6.10	CIP IND-2018-05	Use of the term 'operator' instead of 'airline'
	CIP disposition	CIP accepted as IP 188.
	CIP presented by Dassault-Aviation.	
6.11	CIP IND-2019-01 R2	Making Tasks Resulting from Path 7 Analysis Optional
	CIP disposition	CIP not accepted by IMRBPB.
	CIP presented by Lockheed Martin.	
	<u>MPIG</u> MRB Report would have only one interval but operators with different fleet size may have different perspective on FEC 7 tasks.	
	<u>IMRBPB</u> ISC would take consideration on different fleet size.	
	All tasks defined by the MSG-3 analysis are applicable and effective therefore cannot be considered as an option depending on the type of fleet.	
6.12	CIP IND-2019-02	Interaction between zones
	CIP disposition	CIP returned to the originator for additional work, information or justifications.
	CIP presented by Dassault-Aviation	
	<u>IMRBPB</u> It is already common practice for Working Group to have the same awareness as mentioned in this CIP. The CIP proposal may be too limited, i.e. in Zonal but in fact it should be expanded to other analysis.	
	IMRBPB supported the idea of this CIP but would recommend MPIG to further expand the scope and re-propose in 2020.	
6.13	CIP IND-2019-03	Exempting FEC 7 Tasks from IP-44 Process
	CIP disposition	CIP not accepted by IMRBPB.
	CIP presented by Lockheed Martin.	



IMRBPB

Would like to know why no / lack of data on FEC 7 tasks but not on non-FEC 7 tasks when performing IP 44 evolution?

MPIG

There is no huge difference in getting data on FEC 7 / non-FEC 7 tasks albeit this separates the rigidity applied to the FEC 7 tasks which are purely economic.

IMRBPB

Once the analysis is complete it is a task and they do not believe the operator's maintenance program should not mitigated by provisions in MSG-3 and the MRB report.

Evolution of FEC 7 tasks on in-service fleet should be dealt by NAA / operators.

6.14	CIP IND-2019-04	Effective Date of IMRBPB Agreed Issue Papers
	CIP disposition	CIP not accepted. CIP's intent has been discussed via CIP EASA-2019-03, eventually issued as IP 183.
	CIP presented by Airbus.	
	<u>MPIG</u>	Before this IMRBPB meeting, MPIG was not aware that this CIP was similar in scope to CIP EASA-2019-03. The solutions are not identical hence it is suggested the two CIP to be considered / discussed together.
	<u>IMRBPB</u>	This year's activities leading to the IMRBPB meeting was not the normal flow in terms of logistics. Agreed the two CIP be considered / discussed together.

7. Action Items (AI)

7.1	AI 19/01	Assigned to: MPIG	
	MPIG to provide comments to aid the enhancement on CIP EASA-2019-05.		Refer to item 6.5
7.2	AI 19/02	Assigned to: EASA	
	EASA to create a Working Group dedicated to Bilateral discussions with FAA and TCCA. The outcome of this WG may be a new submission of the CIP by 2020.		Refer to item 6.6



7.3	AI 19/03 Assigned to: FAA	FAA to review IP123 and IMPS 5.9 and may come up with further proposal in 2020 on CIP FAA-2019-01.	Refer to item 6.7
7.4	AI 19/04 Assigned to: TCCA	TCCA to engage CMT to harmonize the CMCC processes as per RMT.0252 Subtask 5 decision, especially on tagging of CMCC tasks, of FAA (AC 25-19A) and EASA (AMC 25-19 Appendix 3) possibly where AC 25-19A would be updated consequentially.	Refer to item 6.8
7.5	AI 19/05 Assigned to: MPIG	MPIG to propose a new CIP to update MSG-3 to the current EASA standard AMC 25-19 on CMCC process, especially on tagging of CCMR tasks.	Refer to item 6.8
7.6	AI 19/06 Assigned to: TCCA	TCCA to raise CIP on coverage of FDR / CVR in MSG-3.	Refer to item 9.2
7.7	AI 19/07 Assigned to: FAA	FAA (Seattle AEG) to find out if the FAA requirements on FDR / CVR are only applicable to MRB Report of individual, but not all, TCH.	Refer to item 9.2
7.8	AI 19/08 Assigned to: FAA	Retrieval of IMRBPB data such as Action Item List.	Refer to item 3
7.9	AI 19/09 Assigned to: FAA	FAA to liaise with MPIG on the communication initiative between IMRBPB and MPIG between IMRBPB Meetings, such as CIP development and interaction between Leadership Teams of IMRBPB and MPIG.	Refer to item 9.4
7.10	AI 19/10 Assigned to: EASA	EASA to review IMRBPB Charter with respect to: (i) Mandatory adoption of IMPS, (ii) Approval of MSG-3 document and IMPS by IMRBPB.	Refer to item 8

8. International MRB/MTB Process Standard (IMPS)

IMPS Issue No. 01 dated 6th May 2019 was signed by the signatories.

9. IMRBPB – MPIG Discussion Topics

- 9.1 IP 180 AHM implementation – updates provided by FAA, IATA, Airbus, Embraer, Bombardier / Airbus Canada, Sukhoi and United Airlines.
- 9.2 Coverage for FDR / CVR in MSG-3.
- 9.3 Updates on CIP ANAC-2017-01 - Applicability and interval determination of failure-finding Functional Checks or Inspections.
- 9.4 Communication initiative between IMRBPB and MPIG between IMRBPB Meetings, such as CIP development and interaction between Leadership Teams of IMRBPB and MPIG.
- 9.5 RMPiG requested that the IMRBPB to invite more rotary-wing partners such as helicopter MRB chairpersons from regulatory authorities.

10. IMRBPB Meetings of 2020, 2021, 2022 and 2023

2020	18 th to 22 nd May	Tokyo, Japan	Hosted by JCAB
2021	23 rd to 27 th May	Dubai, UAE	Hosted by GCAA
2022	TBD	City TBD, Brazil	Hosted by ANAC
2023	TBD	Cologne, Germany	Hosted by EASA

11. Meeting Adjourned