

# APTOZ

## Supplemental Type Certificates

Feedback collected from DM.TEC and SME DOA Alliance

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APTOZ

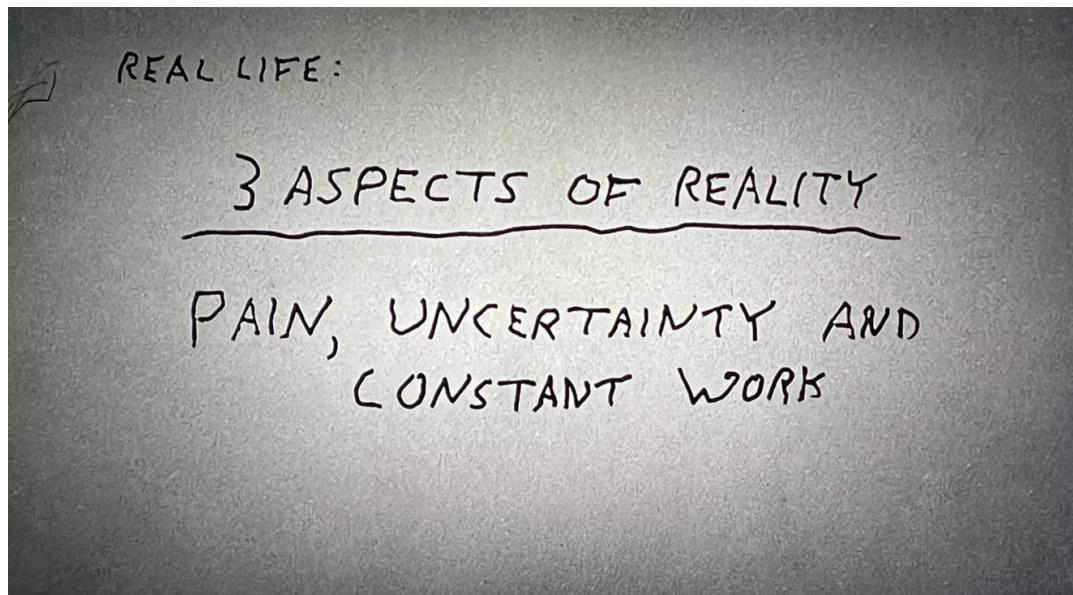
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# Overview

- STC process at EASA
  - Workflow
  - Communication and grading system
- Classification
  - Guidance material
- Improvement



# STC process - workflow

## → EASA portal

- Assignment of PCM relatively quick but the nominated PCM does not seem to have enough resources to respond to applicants in a timely manner (highly dependent on team of experts and not proactive with providing feedback timeplan)

## → Sepiac use

- Very random and not standardized
- Projects finished remain open
- Some PCMs and DOAs don't seem to like it's use

## → Timeline

- Expectations from DOAs and EASA are out of sync
- Timelines rarely discussed and can be committed to

# Communication

- Communication with EASA PCMs and experts
  - Usually very good and professional and feeling is that everyone is doing their best
  - Lack of standardization between experts. Different views on what needs to be demonstrated for compliance for same type of STC projects.
  - Lack of expert time and sometimes they do not have time to prepare or read documents thoroughly
  - Rarely discussions on proposed certification plan timeplan
  - PCM acting more as co-ordinator rather than certification manager of experts. Lack of communication between PCM and experts often evident
    - Certification plan accepted by PCM but then subject experts start adding compliance item to the program in final stages

# Grading System

- Grading system
  - Not used by all participants in project
  - Cases where experts or PCMs have gotten offended that we elevated a certification topic to management
  - Poorly understood by DOAs and lack of explanations from EASA
- Examples of improper use given below

## Expert/PCM comment

## Grade

Difficult to give precise answers, since no Certification Programme and LOI were provided. This was coordinated previously with the DOATL and partly stems from the fact that Iceland is not an EU Member state – DOA could not implement LOI as Iceland had not accepted EU regulation and was penalized by PCM for that.

7/100

Grading system filled in with no comments and no grade.  
No comments = No improvement  
57 entries with/without grades but only 4 with comments.

# Classification

## → Major/minor

- Still an active discussion point inside DOAs, EASA and each other
- Guidance material will never be perfect and there will always be grey areas
- Subjective instead of objective determination
- EASA guidance on this heavily distributed
  - Part-21
  - Certification Memorandums
  - Special conditions
  - FAQs
- Results in un-level playing field and common that one DOA is classifying as major while another is doing minor

# Well done

- Covid-19 special conditions and GM
  - EASA team was leading the world with guidance material
- Easy access regulations
  - Rule and guidance material combined
- EASA staff are easily approachable for questions, a quick phone call or advice
- Certification Memoranda
  - Generally well written and studied



# Improvement

- EASA experts should focus on DOA CVEs understanding of requirements for projects and how to show compliance instead of EASA expert acting as CVEs. Builds confidence and trust both ways
- EASA assigns expert names and not resources
- Guidance material often hidden in many places like FAQs. FAQs are not AMC/GM/CMs. Use only one method of communication for certification: CMs or bulletins.
- Lack of EASA DOA involvement in industry groups like DM.TEC, especially small and medium sized DOAs (70% of all EASA DOA approvals). How can EASA improve regular feedback from their DOAs and make all DOAs feel their voice is being heard?
- Access to special conditions. Not all are accessible.
- Major updates to special conditions not put out for public comments
  - Example non-rechargeable lithium batteries

# Thank you for your attention

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