

Classification or notification of changes

Major and minor changes (Major/Minor changes) - the description of what is a major and what is a minor change (for major changes, the need to issue an SoC/Declaration/Certificate) is defined in general terms in the regulatory proposals. There was no consensus on the interpretation at the EASA webinar. It is necessary to define the criteria for including the change in the big/small category

Answer

The definition of major/minor changes are provided at the AMC/GM level. Further details on the delineation between minor and major changes will be clarified in the forthcoming set of AMC/GM associated to Regulation (EU) 2023/1769 and apply regardless of when the system was deployed/implemented.

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<https://www.easa.europa.eu/da/faq/139159>

The new regulation does not require a notification and documentation of a small change - in cases where the SoC is not changed. A different approach compared to today's DoVs, which cover the entire life cycle of a component/equipment - for small changes, a TF change is made. Will this create a problem at the end of the transition period? – TF will not be updated and SoCs will only have some changes

Answer

The details for the notification and management (incl. documentation) of minor changes are illustrated at AMC/GM level.

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What should an air navigation service provider (ANSP) expect to receive from a design or production organisation (DPO) for minor changes that are not notifiable to EASA and do not result in an update to the certification, and is the ANSP still expected to notify these minor updates as changes to the functional system?

Answer

The DPO is eligible to design and implement minor changes to its CERT/DECL equipment, but has to notify these changes to EASA in any case.

The DPO is required to communicate to the ANSP any update to the technical manuals and maintenance instructions of the equipment.

The ANSP is responsible to notify a change to the functional system in accordance with the change management procedure approved by the competent authority, which may or may not require prior approval.

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