



Composite Initiatives involving EASA

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Composite Initiatives Involving EASA Introduction to CMH-17 Updates

Presentation by:

Melanie Herman, Structures Expert, EASA Simon Waite, Senior Expert Materials, EASA

EASA Webinar 26 March 2025 D.M. Hoyt, NSE Composites Allen Fawcett, NSE Composites

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Introduction



Laurent PINSARD Chief Expert - Airframe

















The 787

Dreamliner family





Composite Initiatives involving EASA

Introduction to CMH17 updates

Composite Initiatives Involving EASA Priorities, Existing Initiatives and Road Map

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20'

15'

5'

Composite Guidance – CS23/CS25/CS27/CS29
Overview of Generic and Product Specific Composite Guidance

• Selection of Means of Compliance

EASA Challenges & Priorities for Composite Initiatives

Global Composite Safety Initiatives

- Overview of Global Safety Initiatives (FAA lead)
- IRCWG, ARAC 25.571, CMH17, CACRC, ASTM, Training

EASA Composite Guidance Road Map

- EASA R&D EPAS Project DESIGN
- EASA Composite Guidance Next Steps for 2025

Q&A Session

10'

Agenda – Part 1

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Overall Aviation Safety Objectives

Source: CMH-17 Composite Certification Tutorial



Public Demand for Safety Assurance



No Reduction of Safety Levels for all products is EASA primary objective

Composite Guidance CS23/CS25/CS27/CS29



Composite Materials – F&DT/Durability Guidance

- → Certification requirements (CS) are specific to products for Materials and F&DT
- → Available Guidance: Product Specific (AMC/AC), Generic (AMC 20-29) and CM

Materials	Certification requirements	AMC	GM	СМ	Structural Durability	Certification requirements	АМС	GM	СМ		
GA	CS23.2260	ASTM F3114-21 CS23.603 Amdt4 CS23.605 Amdt4 CS23.613 Amdt4	AMC 20-29 AMC 20-29 for composite	CM-S-004 Iss 01 CM-S-005 Iss 01 CM-S-008 Iss 04 CM-S-010 Iss 01	GA	CS23.2240	ASTM F3115-20 CS23.573 Amdt4		CM-S-005 Iss 01 CM-S-008 Iss 04 CM-S-010 Iss 01		
VLA	CS23.2260	ASTM F3114-21 ASTM F3380-19 CSVLA.603/605 CSVLA.613		CM-S-004 Iss 01 CM-S-006 Iss 01 CM-S-008 Iss 04	VLA	CS23.2240	ASTM F3380-19 CSVLA.572/627		CM-S-006 lss 01 CM-S-008 lss 04		
Rotorcraft	CS27/29.603 CS27/29.605 CS27/29.613	AC27/29.603 AC27/29.605 AMC 27/29.613 AC27/29.613		AMC 20-29	AMC 20-29	CM-S-004 Iss 01 CM-S-005 Iss 01 CM-S-008 Iss 04 CM-S-010 Iss 01 CM-S-016 Iss 01	Rotorcraft	CS27/29.573	AC 27/29.573	AMC 20-29	CM-S-005 lss 01 CM-S-008 lss 04 CM-S-010 lss 01 CM-S-016 lss 01
Large Aircraft	CS25.603 CS25.605 CS25.613	AMC 25.603 ← AMC 25.605 AMC 25.613		CM-S-004 Iss 01 CM-S-005 Iss 01 CM-S-008 Iss 04 CM-S-010 Iss 01	Large Aircraft	CS25.571	AMC 25.571		CM-S-005 lss 01 CM-S-008 lss 04 CM-S-010 lss 01		

→ Only a limited selection of requirements is listed here, some others apply

Evolution of CS23 Regulation

- → Significant change in CS23 amdt 5 to target **performance based regulation**
 - Design-independent requirements to promote innovation / disruptive technologies
 - To fulfill the willingness of the Industry to be less prescriptive ...
 - ... with growing demand for guidance and interpretive materials for certification of composite structures
- → Evolution of ASTM F3115 is coordinated by ASTM F44.30 with EASA vote
 - F3115 considered as AMC by EASA (CS23.2010)
 - F3115 is referring to generic guidance (AMC 20-29)
 - → How to ensure consistency of generic guidance (e.g. AMC 20-29) with product specific guidance (e.g. F3115) ?
 - → How to manage implementation of novel technology requirements and guidance (e.g. thermoplastics, AM, ...)?



CS23/CS27/CS29 products and environment vs CS25

Some factors need to be considered for durability and damage tolerance approaches

- Loading (no pressurization, lower speed/altitude, variety of missions, spectrum)
- Environmental conditions (range of temperature, aging, ...)
- Design constraints (SLP, bonding, damage growth,) and practicality
- Criticality
- Safety level
- Proportionality
- Inspectability
- Affordability
- Positive past experience !



→ High diversity of operations, ranges, missions and aircraft configurations

→ Increasing safety level with increasing number of passengers



Normal Category Aeroplanes Levels

EASA Rule	MTOW	Aircraft Category	Number of Passengers	Examples
CS-23 Amdt 6	750 kg	VLA – Very Light Aircraft (subset of Level 1)	Max 2 seats Single engine – Day VFR Non aerobatic	Blackshape BS115
	19000 lbs (8618 kg)	Level 1	0 to 1	Extra EA-300
		Level 2	2 to 6	Cessna Skyhawk
		Level 3	7 to 9	Diamond Aircraft DA62
		Level 4	10 to 19	Pilatus PC-24

→ Level of requirements "proportional" to number of passengers

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→ Compliance demonstration should be **proportionate** to aircraft category



14



Selection of Means of Compliance

"Proportionality" of the compliance demonstration for CS23 should consider:

- Certification level (number of passengers)
- Performance level
- **Operations**



Generic vs Specific

 \rightarrow

- Generic Guidance (e.g. AMC 20-29) and Product Specific Guidance (e.g. AC27/29.573, F3115, \rightarrow AMC25.571) are typically used to propose means of compliance to certification requirements, possibly with products cross-references where applicable (e.g. AMC25.307 for CS23)
- Typically **Product Specific** Guidance reflects specifics of the products \rightarrow

Nota: The product specific requirement (CS) takes always precedent over the generic guidance



Next slides will illustrate some **differences** between some products:

 \rightarrow Proof of Structure: typical approaches between CS23 & CS25





CS23 & CS25 Proof of Structure

CS23 Level 1, 2, 3 (e.g. non pressurized aircraft, non commercial operations)



CS25, typical TC holder approach

AMC 20-29 Categories of Damages and Residual Strength



damage severity.

Severe damages created by anomalous ground or flight events should be identified. They may result in Cat 5 damages.

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Residual Strength and Damage Severity



Minimum Required Residual Strength is LL capability for Rotorcraft vs GHL for Large Aircraft (70%LL)



Take Away – Composite Guidance

- → CS23 amdt 6 is **performance based** regulation
- → AMC 20-29 is a generic guidance for all products, harmonized with FAA AC 20-107B
- → Some product specifics are addressed in product AMC/AC
- → EASA Certification Memorandum (CMs) are intended to provide guidance and interpretative material on a particular subject → to be considered similarly as AMC
- → Compliance demonstration approach for CS23 should be "proportionate" to aircraft category levels.



Composite Guidance



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Challenges for Safety of Composite Applications



Novelty

Complexity

Criticality

- Damage tolerance and maintenance practices are key aspects of safety
- Sandwich for PSE
- Structural Bonding
- Inspections and Quality Control Plan
- 'End to End' qualification / certification



Novelty for the applicant

- Advanced Manufacturing, AM
- Development of greener and sustainable technologies
- Repair, Reuse and Recycling
- Thermoplastic overmolding
- Thermoplastic Welding
- VTOL



Complexity

- Performance based regulation (CS23) while the applicants request more guidance
- Lack of standards for composite materials and processes, design criteria, structural substantiation methods and maintenance practices
- Increasing complexity of global supply chains and ramp-up
 High Rates

Knowledge Transfer

- Increasing number of applicants with increasing criticality (all products)
- Increasing number of newcomers in composite technologies with limited experience
- Retiring experienced staff
- Skill Currency





How EASA can ensure **no reduction of safety level** with **novel** technologies, **higher** rates, **newcomers** and **skills handover**?

Priorities for Composite Initiatives

No Reduction of Safety Level for all products

- Safety risk mitigation through regulation and adequate training, considering past airworthiness issues with some composite application
- Proportionality considered for CS23 applications

Work in Close collaboration with other regulators (FAA/TCCA/ANAC)

 Harmonisation / Consistency of requirements for consistent approvals and certification efficiency (e.g. reduction of SEI list) Sustainable and Greener Technologies

 Regulation framework to support development of sustainable composite technologies and advanced manufacturing processes Standardization and Simplification

 Support development of industry standards consistent with EASA requirements

 Enhanced Certification efficiency ensuring regular exchanges and feedback from OEM, airlines and maintenance organizations



Training

 Ensure knowledge Transfer internally & externally to maintain and develop competences



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Composite Guidance: Regulator – Industry Link

Performance Based Regulations - moving work to Standards Development Organisations (SDOs)



CERTIFIED PRODUCT

SDO Example: CMH-17 goes some way to supporting AMC 20-29

- not ideal, but best option available
- includes some 'magic numbers' e.g. DT includes common impactor energies, impactor sizes etc... to be used with caution (Regulator 'substantiated use' warnings included)!
- developed and supported by many USA and EU composite stakeholders, including Airbus, Boeing, Bombardier, Fokker, Rolls Royce etc (up to the point where sharing balances stakeholder IP needs)
- CS25 biased, but expanding to address Engines, Rotorcraft, GA, eVTOL etc





IRCWG (Industry & Regulatory Composite Working Group)

- FAA Sponsor & Lead \rightarrow
- IRCWG is a **Steering Group** \rightarrow
- **Transport Aircraft centric up to now** \rightarrow
- Large and Strong forum, including Regulators, OEM, \rightarrow Airlines, Standardization Bodies and Research Institutes
- **Crosslinked** activities \rightarrow
- Openly share knowledge from past and current \rightarrow composite applications to structure
- \rightarrow Primary advantage comes from industry members with experience & knowledge
- \rightarrow Repository of the presentations (and much more) <u>here</u>





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Capture and Share knowledge and good practices



☆☆☆

☆

☆

Ensure alignment and consistencies regarding certification expectations



Achieve Certification Efficiency and No reduction of Safety Level



ARAC 25.571 (Aviation Rulemaking Advisory Committee)

1/ Objectives and Scope

In 2015, FAA assigned task for ARAC to provide recommendations to FAA regarding 14CFR, part 25 Fatigue and Damage Tolerance requirements (§25.571). Transport Airplane Metallic and Composite Structures Working Group (TAMCSWG) provided advice and recommendations on the tasking.

One of the item added in the scope was harmonization of EASA aging aircraft rulemaking

Targeted products: Part 25 - CS25

2/ Stakeholders

Coordinator: FAA

Industries: Boeing / Airbus / Bombardier / Dassault Aviation / Embraer / Gulfstream / Mitsubishi Aircraft / Textron Aviation

Airlines: British Airways / Delta Airlines / FedEx / United Airlines

Regulators: FAA / EASA / ANAC / TCCA / JCAB

3/ Timeline: 2015-2023

4/ Top Achievements: 4 ARAC reports issued by TAMCSWG:

Initial Report: 06/2018

Structural Bonding :07/2021

Single Load-Path Structures: 10/2021

Crack Interaction: 02/2023

5/ Next Steps: revisions of AC25.571-1D / AC20.107B / AC21-26A to implement the recommendations of TAMCSWG







Note: Also ARAC tasks for crashworthiness, ditching and flammability

Scope of ARAC 25.571 is Metallic & Composite F&DT

SAE-CACRC (Commercial Aircraft Composite Repair Committee)

1/ Objectives and Scope

The charter of the SAE Commercial Aircraft Composite Repair Committee (CACRC) is to promote **repair and modification standardization** and to provide guidance to composite and bonded structure maintenance providers, airlines, regulators, material suppliers and OEMs. This will be accomplished through developing and publishing AIR, ARP, AMS and other guidance documents. These guidance documents are developed to enhance safety and reduce aircraft ownership cost.

Targeted products: Part 25 – CS25 / CS-E

Note: EASA is on the CACRC Exec

2/ Stakeholders

Coordinator: SAE

Industries: Boeing/Airbus/Bombardier/Spirit/Embraer/Collins/Nordam Material Manufacturers: Hexcel / Teijin/ Solvay / Henkel /Saint Gobain/... Airlines: United / Delta/Air France/Lufthansa/TAP/Japan Airlines/ANA/Cathay Pacific Regulators: FAA /EASA

3/ Timeline: 1991-now

4/ Top Achievements

- AIR6292 Guidelines for Bonded Repair Process Evaluation of Fiber Reinforced Composites
- → AIR7509 Reporting of Damage to Composite Structure
- → AIR4938 Composite and Bonded Structure Technician/Specialist Training Document
- → AIR6825 Identification and Assessment for Damage to Composite Aircraft Structures
- AIR6902 Guide for the Design of Durable, Repairable and Maintainable Aircraft Composites
- 5/ Next Steps, e.g.

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-ARP7520 – Certification Guidelines for Aircraft Modifications Involving Composites (in progress through Mods task group) -Development of Alternate Repair Material and Process Qualification and Substantiation Protocol involving secondary structural parts

→ IRCWG inputs are important, work in progress



SAE-CACRC Task Groups:

- Repair Techniques
- Repair Materials
- Procedures
- Inspection
- Training
- Design
- Mods



ASTM (American Society for Testing and Materials)

1/ Objectives and Scope

Standardization body supporting development and delivery of voluntary consensus standards. Today, over 12,000 ASTM standards are used around the world. Each main committee in ASTM International is composed of subcommittees that address specific segments within the general subject area covered by the technical committee.



4/ Top Achievements

- → For General Aviation aircraft, see F44 Standards Management Table : link
- Transfer of CS23 amt 5 into ASTM \rightarrow
- → Mode 1 dominated skin to core test standard (supporting EASA EPAS Sandwich Structure work, including planned revision to EASA CM-S-005)

5/ Next Steps

- Under F44.30 the following work is in progress
 - WK86457--New Standard | General Damage Tolerance Evaluations
 - WK78199--New Standard | Safe--Life, Inspection Intervals \rightarrow
 - WK68230--F3093 Revision | Aeroelastic Requirements \rightarrow
 - WK86458--New Standard | Composite Damage Tolerance Evaluations
 - WK86455--New Standard | Durability Components to be Evaluated \rightarrow

SCB TEST (ASTM WK 56166)

Note: ASTM provides important support for CMH-17, and EASA

FIG. 1. Single Cantilever Beam Speci

 \rightarrow Needs alignment with CMH17 vol. 3 rev H !



ASTM

Composite Trainings





1/ Objectives and Scope

Wichita State University

Institute of Aviation

The **WSU** training courses are targeting "workforce education" for people dealing with composite applications, covering the essential topics pertaining to composites engineering and the certification process. They have been developed by FAA:

- CSET: Composite Structural Engineering Technology, including "Hands-on" course (WSU iLOT). Course development was supported by FAA and industry engineers, bringing decades of experience in both regulatory and engineering practice to the course development. (European 'hands-on' course held at iLOT)
- <u>CMfgT: Composite Manufacturing Technology</u>: provides manufacturing professionals with a technical background in the manufacturing of composites. Students examine each of the fundamental processes of composite manufacturing, and where individual processes fit within the overall fabrication scheme.
- <u>CMT Composite Maintenance Technology</u>: provides a background in critical maintenance issues associated with composite structures. Students will gain increased understanding of safety implications concerning the maintenance and repair of composite materials utilized in aerospace

The CMH-17 training courses are covering:

- Statistics Tutorial (STAT-17): This tutorial is a comprehensive treatment of the CMH-17 methods for statistical analysis and their importance to proper development of design information.
- **Composite Certification Tutorials (FAA/EASA delivery)**: The tutorial provides an overview of the subjects of certification, regulations, design substantiation, and essentials of production and maintenance delivered by subject experts, with an emphasis on structural substantiation. The linkage among design, production, and maintenance functions in the context of unique material properties of composite materials has long been recognized as a critical part of safe and efficient certification. Developing an awareness of regulations and their role is another essential understanding for practitioners engaged in certifying aircraft.
- Structural Bonding (new).
- Ceramic Matrix Composites (new)

Industry training courses from OEM (Boeing, Airbus) are also available

Targeted products: all

IEASA

2/ Stakeholders

Coordinator: WSU – CMH-17

Regulators: FAA

*Note: CMH-17 is developing further new tutorials and potentially 'mini-tutorials', to be linked to various subject/chapter themes



Take Away – Global Composite Safety Initiatives

- → **FAA** sponsor and lead of major global composite safety initiatives
- → IRCWG is a Steering Group, involving Regulators and OEM
- → Mainly **Transport Aircraft** centric to date
- → SDO's (Standards Development Organisation) are key stakeholders supporting composite materials standardization (CMH-17, SAE CACRC, ASTM, ...)

Key enablers for positive impact on aviation safety and certification efficiency:

- ✓ Steering group including OEM and Regulators to prioritize safety needs
- ✓ **Harmonization** and good collaboration between **regulators** to align on composite requirements /AMC
- ✓ Involvement of Regulators and Industry in task groups → knowledge transfer
- ✓ **Cross linked activities**, but no duplication or divergence of activities (e.g. between SDOs)

→ Global initiatives have mainly targeted **large aircraft** applications

→ To be developed for **GA/Rotorcraft**, (VTOL?)



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This project is funded from the European Union's Horizon Europe research and innovation programme.

R&D EPAS Project DESIGN

Damage Tolerant Design of Sandwich Structures in PSE applications







Sandwich Structures in PSE

- → Lightweight structures with high stiffness and strength to weight ratios
- → Several safety issues experienced during the past decades with composite sandwich across a range of products, due to sandwich disbond and damage growth.
- → Sandwich disbond and damage growth behavior are critical aspects of Damage Tolerance of sandwich applications

Some initiatives were launched by EASA:

- ightarrow to better understand the influencing factors on sandwich disbond
- \rightarrow to develop some testing methods to characterize sensitivity to disbond
- → CM-S-010: The Safe Design and Use of Monocoque Sandwich Structures in Principal Structural Element Applications
- → R&D project **DoSS** "Disbond of Sandwich Structures" 2016-2017
 - → Disbond of Sandwich Structures report EASA_REP_RESEA_2016_2 (online)
 - → Engineering approach for sandwich disbond analysis
 - \rightarrow Testing method for sandwich fracture toughness

Sandwich structure typical damages

Design Curves

Practical design solution e.g. closed form design solution developed for large aircraft (NSE / FAA)

EASA R&D DESIGN Project

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- → **DESIGN**: Evolutions of airworthiness standards for new aircraft structure design using materials, processes, and advanced manufacturing methods
- → Main objective: Develop key enablers for safe design and use of sandwich structures in PSE applications.
- 2025-2027 Main Tasks: \rightarrow Task 3 Task 5 Task 4 3v Task 1 Improvement of Task 2 Conclusions, Development of Provision of a damage recommendations **Hybrid Structure** Development of "Current detection for implementation substantiated Continued 1 M€ typically difficult roadmap and industry status design solutions Airworthiness cost-benefit to detect report" Strategies analysis damage Contractor **Consortium Members:** \rightarrow ര്ര Project Università di **Genova Fraunhofer** JINSE COMPOSITES ZEASA Lead IMWS % LEONARDO (DUPONT) AIRBUS **AIRBUS** EASA 37 HELICOPTERS COMMERCIAL AIRCRAFT

Composite Guidance Road Map

Composite CM	CS	AMC	ASTM F44.30	SDOs	R&D
 CM-S-004 issue 02 CM-S-005 issue 02 CM-S-006 issue 02 Update CM-S-010 to include outcomes of EPAS DESIGN project (sandwich) 	 Correct CS23 Amdt 6 to refer to F3115-15 as AMC (already launched on FAA side) 	 Launch rulemaking task to update AMC25.613 	 WK86458 to develop composite DT evaluations guide (running) F3115-2X should be released by F44.30 as CS23 AMC (F44.30 WK91509) 	 CMH-17 activity to include GA + Crashworthiness TG for Rotorcraft CMH-17 Sandwich disbond TG SAE CACRC ARP 7520 SAE CACRC repair material qualification 	• EPAS DESIGN Project

Next Steps for 2025

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- → EPAS Sandwich DESIGN: KOM 13/01/25 3y project
- → CM-S-004, CM-S-005, CM-S-006 updates
- → F44.30 Composite Working Group (F3115)
- → Support standardization activities
- → EASA/FAA/TCCA/ANAC exchanges to address specific topics on CS23

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