



Explanatory Note to Decision 2015/016/R

Certification Specifications for Standard Changes and Standard Repairs (CS-STAN) — Phase 1

RELATED NPA/CRD 2014-24 — RMT.0245 (MDM.048) — 8.7.2015

EXECUTIVE SUMMARY

This Decision addresses a proportionality issue: it will allow a simpler process for the design and embodiment of some changes and repairs when applicable to certain aircraft (aeroplanes up to 5 700 kg MTOM, rotorcraft up to 3 175 kg MTOM, most sailplanes, balloons and airships).

The concept of Standard Changes and Standard Repairs was introduced with Regulation (EU) No 748/2012 (21A.90B and 21A.431B). In order to use these concepts, the establishment of the related Certification Specifications (CS-STAN) was required by EASA. The package now released (Phase 1) contains a first Decision on Certification Specifications CS-STAN with additional AMCs to Part M, mainly.

In the future, CS-STAN will be further supplemented (Phase 2) based on lessons learned during Phase 1 and with new proposals provided by the affected stakeholders.

The proposed changes are expected to reduce the regulatory burden for the embodiment of simple changes and repairs in/on certain aircraft when fulfilling the acceptable methods, techniques and practices included in CS-STAN. It is expected that this will have a positive impact on the operation of the affected aircraft in Europe, thus promoting General Aviation (GA). Additionally, a simplified procedure for the embodiment of Standard Changes and Standard Repairs could limit the illegal practices of some owners that have not followed the applicable rules when modifying the aircraft and encourage the installation of safety equipment.

Applicability		Process map	
Affected regulations and decisions:	Regulations (EU) Nos 748/2012 & 1321/2014; ED Decision No 2003/19/RM, and ED Decision No 2012/020/R.	Concept Paper:	No
Affected stakeholders:	Light aircraft owners; design organisations; maintenance organisations and individuals involved in maintenance; Continuing Airworthiness Management Organisations (CAMOs), and National Aviation Authorities (NAAs).	Rulemaking group:	No
Driver/origin:	Proportionality	Terms of Reference (Issue 2):	16.12.2014
Reference:	N/A	RIA type:	Light
		Technical consultation during NPA drafting:	No
		Publication date of the NPA:	6.10.2014
		Duration of NPA consultation:	3 months
		Review group:	No
		Focused consultation:	No



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1. Procedural information

1.1. The rule development procedure

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed ED Decision 2015/016/R in line with Regulation (EC) No 216/2008¹ (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure².

This rulemaking activity is included in the Agency's [4-year Rulemaking Programme](#) under RMT.0245 (MDM.048)³. The scope and timescale of the task were defined in the related Terms of Reference (ToR) (see process map on the title page).

The draft text of this Decision has been developed by the Agency. All interested parties were consulted through NPA 2014-24⁴. Around 380 comments were received from interested parties, including industry and National Aviation Authorities (NAAs).

The Agency has reviewed the comments received on the NPA. The comments received and the Agency's responses are presented in the associated Comment-Response Document (CRD) 2014-24⁵.

The final text of this Decision with the Certification Specifications (CS)/Acceptable Means of Compliance (AMC)/Guidance Material (GM) has been developed by the Agency.

The process map on the title page summarises the major milestones of this regulatory activity.

1.2. Structure of the related documents

Chapter 1 contains the procedural information related to this task. Chapter 2 explains the core technical content. The text of the CS/AMC/GM is annexed to the ED Decision.

¹ Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1).

² The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'. See Management Board Decision concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material (Rulemaking Procedure), EASA MB Decision No 01-2012 of 13 March 2012.

³ http://easa.europa.eu/document-library/terms-of-reference-and-group-compositions?search=245&date_filter_1%5Bvalue%5D%5Byear%5D=&=Apply.

⁴ In accordance with Article 52 of the Basic Regulation and Articles 5(3) and 6 of the Rulemaking Procedure.

⁵ <http://easa.europa.eu/document-library/comment-response-documents>.



2. Explanatory Note

2.1. Overview of the issues to be addressed

Commentators suggested that the regulatory framework for General Aviation (GA) aircraft has become too heavy with the introduction of Regulation (EU) No 748/2012. They create a regulatory burden for the owners of these aircraft, thus discouraging the development of this aviation sector.

To minimise this burden, the Agency is adopting Certification Specifications for Standard Changes and Standard Repairs (CS-STAN), as defined in 21.A.90B and 21.A.431B of Annex I (Part-21) to Regulation (EU) No 748/2012. The Decision contains AMC/GM to Part-M, Part-145 and Part-21 to guide the implementation process.

The concepts of Standard Changes & Standard Repairs were introduced with Regulation (EU) No 748/2012 and allow, under certain conditions and for certain aircraft, the modification of the design of an aircraft without following the design approval process described in 21.A.95, 21.A.97 and 21.A.437. These Standard Changes and Standard Repairs do not require a design approval, issued by the Agency or by an approved Design Organisation (DOA).

Except for the case of repair and change design acceptable in accordance with bilateral agreements, in the absence of Certification Specifications for Standard Changes & Standard Repairs, Regulation (EU) No 748/2012 mandates the approval of a change design or of a repair design as a prerequisite for their embodiment in/on the aircraft. Without the adoption of the CS for Standard Changes and Standard Repairs, there will be no deviation from to this process.

2.2. Objectives

The overall objectives of the EASA system are defined in Article 2 of the Basic Regulation. This proposal will contribute to the achievement of the overall objectives by addressing the issues outlined in this Chapter.

The specific objective of this proposal is to create safe and cost-efficient Certification Specifications defining detailed acceptable methods, techniques and practices, including requirements for the marking of the parts and instructions for continued airworthiness in order to implement Standard Changes and Repairs for:

- aeroplanes of 5 700 kg Maximum Take-Off Mass (MTOM) or less;
- rotorcraft of 3 175 kg MTOM or less; and
- sailplanes, powered sailplanes, balloons and airships, as defined in ELA1 or ELA2.

2.3. Outcome of the consultation

Please refer to CRD 2014-24, published on the Agency's website.

2.4. Summary of the Regulatory Impact Assessment (RIA)

The adoption of the Certification Specifications for Standard Changes and Standard Repairs and related AMC/GM to Part-M, Part-145 and Part-21 will simplify the process of embodiment of changes/repairs for a number of cases in/on certain aircraft. The design approval process by a DOA or EASA is no longer required. The level of safety is believed to be maintained considering that the design developed as a



Standard Change or Standard Repair will follow acceptable methods proven by experience, as well as the qualification and know-how of the persons entitled to carry out these changes and repairs.

The new process will only be applicable to certain aircraft: aeroplanes with MTOM equal to or below 5 700 kg, rotorcraft with MTOM equal to or below 3 175 kg and most sailplanes, powered sailplanes, balloons and airships, as long as 21.A.90B or 21.A.431B is fulfilled. The Standard Changes and Standard Repairs will have to comply with the acceptable methods, techniques and practices for the particular Standard Change or Standard Repair, as included in the Certification Specifications.

The concept of Standard Changes and Standard Repairs is part of the Agency's activities to **reduce the regulatory burden for GA**. It will, in particular, reduce the regulatory burden for the embodiment of changes and repairs in certain aircraft when complying with the acceptable methods, techniques and practices included in CS-STAN. It is expected that this will have a **positive impact on the operation of the affected aircraft in Europe, thus promoting GA**. Additionally, the existence of a simplified procedure for the embodiment of Standard Changes and Standard Repairs **could limit the illegal practices** of some owners that have not followed the applicable rules when modifying the aircraft and encourage the installation of safety equipment.

More details with regard to the Regulatory Impact Assessment (RIA) can be found in Chapter 4 of NPA 2014-24.

2.5. Overview of the amendments

CS-STAN adopted with this Decision contains acceptable methods, techniques and practices for carrying out and identifying Standard Changes and Standard Repairs for their embodiment in/on certain aircraft without the need for a design approval.

The Certification Specifications may sometimes contain additional limitations, in terms of aircraft applicability or permitted operation, as laid down in the paragraphs 'Applicability' and 'Limitations' of each Standard Change and Standard Repair. Considering that until now changes to the type design required a design approval (by a DOA or by EASA), the Agency is taking a cautious step with this CS and is proposing only certain Standard Changes and Standard Repairs or limitations to certain aircraft. A gradual implementation of this concept, that will allow the industry, NAAs and the Agency to find adequate solutions for unforeseen scenarios and will ensure that safety is maintained at an acceptable level, is considered appropriate. In a second phase of this rulemaking activity (Phase 2), the Agency will consider to add some of the proposals made by stakeholders during the consultation process of Phase 1 .

In addition to the Standard Changes (Subpart B) and Standard Repairs (Subpart C) contained in CS-STAN, the CS also contains a Subpart A - General with information on how to use/understand the CS.

The Decision also includes AMC mainly to Part-M in respect of eligibility of parts, installer responsibility, amendment of aircraft manuals, records, etc. These AMC are proposed considering, to the highest possible extent, the possibilities offered in the current Part-21, Part-M and Part-145 framework.



3. References

3.1. Related regulations

- Commission Regulation (EU) No 748/2012 of 3 August 2012 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations and repealing Commission Regulation (EC) No 1702/2003 (OJ L 243, 27.9.2003, p.6-79). Regulation as last amended by Commission Regulation (EU) 69/2014 of 27 January 2014 (OJ L 23, 28.1.2014, p. 12).
- Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks. (OJ L 362, 17.12.2014, p. 1)

3.2. Affected decisions

- ED Decision No. 2003/19/RM of the Executive Director of the Agency of 28 November 2003 on acceptable means of compliance and guidance material to Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks.
- ED Decision No 2012/020/R of the Executive Director of the Agency of 30th October 2012 on acceptable means of compliance and guidance material for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations ('AMC and GM to Part-21') repealing Decision No 2003/01/RM of the Executive Director of the Agency of 17 October 2003.

3.3. Reference documents

Please refer to the Subpart A — General of the Certification Specifications (CS-STAN), adopted with this Decision.

