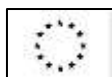
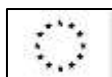


<u>List of participants</u>		
Attendees:	Pietro BARBAGALLO	Italy
	Ørjan BJØRNSTRØM	Norway
	Stéphane BONJEAN	Luxembourg
	Nicholas BUTTERFIELD	Ireland
	Marcello CAUCHI SAVONA	Malta
	Henk CORPORAAL	European Defence Agency (EDA)
	Michael DELA	Denmark
	Matej DOLINAR	Slovenia
	Piotr DROBNIAK	Poland
	Juraj DOVAL	Slovak Republic
	Clément DUFIX	France
	Ómar Thor EDVARDSSON	Iceland
	Remir GJOLIGAJ	Albania
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	David JUHASZ	Germany
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	Bárbara LEMA FERNÁNDEZ	Spain
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	<u>EASA:</u> Youri AUROQUE Harald BAER Apostolos BATATEGAS Bernard BOURDON Carmen CHIRITA Eduard CIOFU Eugenia DIAZ ALCAZAR Ana-Marija DURANEC Joaquin DURAN CEREZA Ralf ERCKMANN Alberto FERNANDEZ LOPEZ Guillermo GAGO GONZALEZ Ludwig HESSLER Antonin MACHALA Guido MARGIOTTA Jeremie NEVEUX Lorenzo PELLEGRINI Luis PIRES Rodrigo PRIEGO Jose QUINTAS Alessandra SPACCATROSI Karl SPECHT Thaddee SULOCKI Rosa TAJES Claudio TREVISAN Christian VAN LIESHOUT Micaela VERISSIMO	
<u>Apologies:</u>	Kalle ALLIKSON Veljko BASARIC Kerstin FITZ-GAHAN Aleksandar MOJSOV	Estonia Serbia Liechtenstein The Republic of North Macedonia



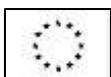
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<b>Attachments:</b> Where relevant, embedded on the Microsoft Word version of the meeting minutes
<b>MoM Distribution:</b>
To the participants and P&CA TeB members, alternates and observers.

MoM prepared by	Carmen Chirita & Luis Pires, EASA	Electronic review	
(D1_1) Welcome and introduction			(Information)
Welcome by Ralf ERCKMANN (RER)			
Due to the CoVid-19 crisis, the meeting P&CA TeB April 2021 takes place as a Webex meeting. RER welcomes the attendees on behalf of EASA and addresses the attendees with the following points:			



### New Methods

- New ideas of how to make these meetings more effective are being considered: more frequent but shorter meetings with dedicated topics, meetings with specific audience (limited or wider audiences).
- At the light of the gained experience EASA is also considering establishing short sessions (typically 1 hour) to reach out people in the field, for example all licensed engineers in EU or all inspectors in certain domain, if there are important messages to convey.
- Feedback from the TeB members would be welcomed.

### Brexit

- EU Parliament agreed on the EU – UK Trade Treaty making the separation of UK from EU official and bringing clarification to the relation EU – UK.
- An agreement with UK covering design and production has been signed. The implementation procedures are being drafted and close to be signed.
- No agreement or working arrangement in the other domains, including maintenance, has been established yet. This means UK will have the same statute as any other third country.
- A high number of approvals in UK (around 500, from which approximately 240 are AMOs) are now under the responsibility of EASA. The help from NCAs under the partnership agreement will be important to help EASA to cope with the increased workload.

### High priority items in the agenda

- Digitalisation – Very important for EASA and most of the NCAs, it comprises several elements:
  - An internal dimension related to how our internal processes are implemented (paperless systems, digital, etc) and on how we interact with the applicants (how we issue the approvals, etc).
  - The dimension of the industry going digital where standards are being discussed with regards to paperless release forms, use of the latest technology. We must discuss with industry minimum standards to move safely into digital.
- Remote oversight / audits – it works better in some domains than in others. We need to share our experience and be fully aligned.

### **(D1\_2) Adoption of the Agenda / Adoption of the minutes of the previous meeting**

**(Decision)**

*Presented by Eugenia Diaz Alcazar (EDIA)*

#### **Agenda**



Agenda PCA TeB  
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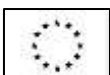
No comments are received to the proposed agenda, which is adopted.

#### **Minutes of the previous meeting**

All received comments were assessed and minutes adjusted as needed. The updated minutes have been distributed in advance and approved during the meeting without further comments.

### **(D1\_3) IAW/CAW rulemaking update slot (focusing only on NAA questions)**

**(Information)**



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[FS1.1] [P&CA TeB meeting 2021-1] [Date: 28-29/04/2021]

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DAY1\_AI3\_CAW DAY1\_AI3\_IAW RM  
update RMT&SIAP 2' update PCA TeB.pdf



The presentations with regards to IAW and CAW rulemaking update as well as the standardisation planning have been previously shared with all P&CA TeB to allow the participants to submit their questions during this item of the agenda.

The following is a summary of the questions and answers presented:

**ES** submitted a question with regards to the amendment of Commission Regulation (EU) No 1321/2014 (CAW Reg) concerning "ICA", "Installation of parts without EASA Form 1" amendment to the deadline to fully comply with Part-CAO and Part-CAMO.

**EC** answered that this amendment is related to the amendment of Commission Regulation (EC) 748/2012 (IAW Reg) covering the same subject and both amendments have been adopted. **EDIA** clarified that amendment includes the postponement of the deadline for Part-CAMO and Part-CAO to March 2022.

**FR** submitted a question about the opinion timing of RMT.0734 (One CAMO for airline business group) and the possibility of having a workshop which was addressed by **EDIA** by confirming the expected timing and stating that no workshop is foreseen.

**ES** submitted a question on RMT.0255 (Review of Part-66) specifically about the ECQB. **EDIA** explained that the ECQB was not part of RMT.0255. However, it is an item that needs to be discussed further, no final decision as been taken yet.

**FR** commented RMT.0735 (Regular update of CAW Reg) by asking what its scope would be and if addresses the expected shortage of licensed mechanics. **EDIA** asked **FR** to clarify the intent of its question: it results from contacts with Mechanics Associations in FR and it mainly relates to licensed mechanics shortage in GA. FR agreed on providing more information during the next TeB meeting.

**IT** asked for clarifications with regards to RMT.0278 (Importing of a/c) and RMT.0521 (Airworthiness review process). **EDIA** clarified that those tasks were on hold and that the discussion with the review groups finalised. A single opinion is envisaged for those two RMTs. It is also the intention of EASA to setup a specific dedicated P&CA TeB meeting. **EDIA** confirmed that Part-ML will have to be considered in RMT.0278 (its ToR is pre- Part-ML).

**Rodrigo Priego (RPR)** was taking the questions pertaining to IAW RM update as follows:

**FR** submitted a question with regards to RMT.0251 (SMS in Part-21 and Part-145), opinion published by the end of last year, about how confident EASA was in relation to the timing of the publication of the amendments (Opinion 04/2021). **RPR** informed that once the opinion is published it is not an EASA process anymore. **RPR** provided an overview of the status of the process. No showstoppers have been raised until now. The opinion will be discussed again in June this year. In parallel the AMC/GM is under development.

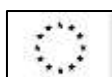
#### (D1\_4) How to tackle digitalisation? Update from PL about their experience related to the approval of electronic systems used for maintenance

Presented by Piotr DROBNIAK – Polish CAA (ULC)

(Information/  
discussion)



DAY1\_AI4 Polish  
CAA electronic system



The Polish Competent authority (ULC) provided a presentation to share their experience related to the approval and use of the electronic system in maintenance environment, also expressing their concerns related to the approval of procedure, integrity of records and transferability between systems.

Due to the commonality of this presentation with the next one, prepared by EASA, it was decided to have a common discussions session at the end of the last one (see next D1\_5).

## (D1\_5) Digitalisation: paperless maintenance

*Presented by Eugenia DIAZ ALCAZAR (EDIA) and Alberto FERNANDEZ LOPEZ (AFL)*

**(Information/  
Discussion/  
Conclusions)**



DAY1\_AI5\_EASA  
e-CAW2.pdf

**AFL** explained that due to the requests received, EASA is preparing a cross domain guideline on use of e-tools, including e-signature of documents which will be customised to different scenarios in different technical domains, aiming to keep consistency or justify differences. To develop this guideline, it is requested the advice of the NCAs and industry and EASA will send in this respect a questionnaire to collect the opinions on this matter. The presentation aims to initiate the discussions on the proposed scenarios and make the audience aware about the coming questionnaire.

### Common discussions session:

**IT:** is there a RMT to include GM on digitalisation? Are the security audits considered?

**EASA:** Initial objective is to create a guideline, for the time being no provisions in CAW Reg has been identified as preventing digitalisation. The security audits will be an item in the coming survey.

**Bernard Bourdon (BBO - Head of Air Crew & Medical Department)** explained that EASA is aware that there are general difficulties in all domains. A task force has been created with the main objective of analysing digitalisation from all domains, avoiding compartmentation. The referred survey will help to identify the issues. At a later stage it will be assessed if an amendment of the regulations is needed.

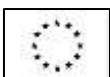
**IS** asked if EASA think that the Implementing rules are flexible enough to cover both electronic and digital signature?

**EASA:** yes, no showstoppers have been identified in CAW Reg. related to recognition of e-signature: Regulation(EU) No 910/2014 (eIDAS) states that qualified e-signature has to be recognised at the same value as the wet signature, but that also the other level of signatures shall not be ignored; (the qualified e-signature is the equivalent to the wet signature). Our rules establish that should be signed with no reference to what the format of signature should be or how to handle the signature process.

**PL** added that we should concentrate only on the minimum requirements for e-signature and not to digital signature which also addresses security.

**BBO:** Legal effect of e-signature (qualified, advanced) cannot be denied. EASA's views is that e-signature is suitable for any internal workflow. An additional difference between the advanced and qualified e-signature is the cost. EASA tries to facilitate the integration of e-signature without imposing extra cost to the organisations.

**ES:** is eIDAS applicable for all the continuing airworthiness processes?



**EDIA:** eIDAS focuses on the electronic identification, not on the processes.

**FR:** Digitalization is a multidomain matter. The same questions were raised regarding FCL domain. We see that a significant amount of signed document could be digitalized (electronic signature or digital storage for example). When drafting these guidelines, we recommend sharing our proposals with other domains to achieve a cross domain consolidation

**EDIA:** noted, already part of the mentioned task force.

**MT:** Please consider the integration of Part-66 in the EASA DLAP programme

**BBO:** Digital licence for the aviation pilots (DLAP) is the first part of creation of digital licence. This project is based on an ICAO amendment to Annex I. The task force is progressing with ICAO and the change is expected to be effective in November 2022. It will include all ICAO licences (including Part-66). The new format (in accordance with ICAO format) has the goal to be mutually recognised by all the Licences States.

**ES:** Not clear if eIDAS was considered by everyone when e-TL system is approved by the different NCAs. This results in a lack of standardisation.

**EDIA** thanked for the comment and noted this implementation difference mentioning that EASA does not have all the answers now. The aim of presentation is to show where we are and what to achieve. Discussion will continue in the future.

**PL:** clarified the use of the e-TL referred on their presentation by the pilots and maintenance staff (using different devices – tablets).

**IT:** when approving e-FB, if e-TL is used in conjunction with e-FB we should encourage integration of e-TL with e-FB in order to avoid having two different systems used for the same purpose; in addition, having in mind that the inspectors are not IT systems experts, it should be considered in EU regulation a certifying standard for this kind of tools in use for maintenance.

**EDIA** thanked and noted the comments from IT as to be considered in the future.

**IS:** shared their experience with an operator which implemented the digital signature by purchasing an “of the shelf” software which was not considering all the applicable rules namely in what concerns remote certification; there were many difficulties when assessing this organisation.

**AFL** answered that it is true that this e-signature system allows to have remote certification. The rule does not mention where should be the CS; it was implicit for wet signature that CS should be at the location where the task is performed but, now with the new system it might be possible to abuse the rules. A change in the rules may be needed to address it.

**IT** commented that to manage this issue, the digital signature should be linked to the acceptance of inspection through use of informatic and communication technologies (ICT) tools, as described in the FAQ for the release to service of new parts.

**AFL** informed the audience that the respective FAQ was transferred in the GM part of the package to be published soon, but only for production. In addition, the remote audits concept was also introduced as guideline for all the initial and continuing airworthiness approvals and will be part of the same rules package.

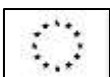
**ES** and **IS** proposed to have dedicated meeting or workshop on this subject in order to reach standardisation between the working methods of the competent authorities.

**EDIA** concluded that the topic related to digitalisation is a priority for all of us and the NCAs will receive the survey questions; EASA will continue to work on this subject and additional event on this topic are not excluded.

#### **(D1\_6) Remote audits**

*Presented by: Carmen CHIRITA (CCH)*

**(Discussion)**



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[FS1.1] [P&CA TeB meeting 2021-1] [Date: 28-29/04/2021]

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DAY1\_AI6 P&CA TEB DAY1\_AI6\_Guideline  
2021-04\_Remote audits for NCAs when per

**Carmen Chirita (CCH)** and **Antonin Machala (AMA)** delivered a presentation on Remote Audits. An EASA drafted detailed guideline was also included aiming to seeking the advice of the NCAs for further developments.

#### **Discussion:**

The following questions from EASA were presented for the discussion:

- Do you see the need of developing such a detailed guideline?
- Could this be applied also by the approved organisations?
- What is your experience related to remote audits?
- What could be the best solution to promote the principles of remote audits in a standardised way?

**IT** confirmed the need to have such guidelines and have the same tool to all MSs which should be available for the organisations. Some limitations of remote audits were also referred like for example in the case of product audits where remote audits cannot be used. Also mentioned was the difference of approach to the use of remote audits between experienced inspectors and young inspectors. IT contribution can be summarised as follows:

- need to define a more specific traffic light protocol than the one shown during the presentation.
- what type of objective evidence is expected (pictures, video?) to support findings.
- standard for the recordings during the remote audit.

**EDIA** clarified that this issue is not exclusively linked to the current pandemic situation. Once the pandemic situation is over remote audits is a tool to continue be used.

**CCH** clarified that the type of evidence collected should be agreed beforehand with the organisation under the agreement between authority and the organisation as referred during the presentation. This agreement also needs to cover other aspects like company know-how or military security.

**HU** was asking if there is a specific checklist for the remote audit.

**CCH** answered that remote audit is only an alternative mean to perform the audit thus the existing checklists can be used. There is no specific checklist for remote audits as the requirements are the same.

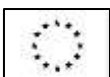
**IT** raised a comment with regards the possible connection between a desktop audit or review of documents and then the use of remote means to verify or discuss with the organisation some items. Could this be considered a remote audit or just a complement to the desktop review was the comment from **IT**.

**AMA** clarified that the discussion on remote audits is of general nature and that it has to be adapted on case by case depending on size, complexity, scope etc.

Several comments were provided in writing during the discussions as follows:

**PL:** Experience from PL indicate that remote audits take longer to achieve similar results as on-site audits. **PL** is also using hybrid audits - remote together with on-site (time spent on the organization site is limited to minimum)

**CH:** In general, we have less findings in remote audits and more time is needed. Onsite audits are more efficient in these aspects.





**DK:** We agree that remote audit is needed during the Covid-19 as special way to come through. But what we do under the Covid-19 cannot be the end solution – it can be a way to “test” different options – and then after the Covid-19 – we can analyse the outcome and then conclude the “best way forward”.

**FR:** Remote audits is one of the tools to be considered as part of the Risk-Based Oversight approach NAAs must implement iaw Part-CAMO (and will soon have to implement iaw Part-145 and Part-21). Guidance material on remote audits should then be developed keeping in mind what is required by applicable section B requirements regarding the oversight of approved organisations (and might be included as AMC/GM to these section B requirements).

**AT:** Agreed with the DK comment. After all, remote audits are contingency modus.

**MT:** Remote audits should not be the norm unless risk is low and may not be efficient when auditee is unknown. Agreed with DK

**IS:** Agree with MT.

**HR:** Agreed with the DK comment.

**IT:** The table on slide 16 is limited to Continued Surveillance. Is it intentional or it may be extended to significant changes of the terms of approval in case of "green/amber" kind of audit? **CCH** clarified that it was just an example.

**RER** addressed the discussions and the comments received in the webex chat by saying that they are very much in line with EASA internal discussions, and we all agree that remote audits have limitations. However, it was also stated that we need to consider the opportunities exposed by the pandemic situation. In summary we agree on the limitations, let us focus on the opportunities by considering the savings in travel costs, in travel time and associated gains in efficiency, the development of technology and the increasing acquaintance with these new methods and be open minded.

**RO:** Considering the surveillance challenges in this period, for the surveillance of POA suppliers (e.g. located in EU countries) are encouraged by EASA cooperation between NCAs in respect of allocation, performance and documentation of surveillance tasks? Should be used EASA FORM 58? **CCH** confirmed that yes it can be used when there is an agreement between NCAs.

**DE:** An organization should have no advantage or disadvantage from being inspected onsite or remotely compared to its competitors.

**KSP:** Added an important point to the discussion by stating that all these activities are strongly based on trust. So, if during the normal on-site audits we found that the organisation is not trustable then we should not use remote audits with this organisation. Remote audit should be the tool of choice if have the trust in the organisation ability to perform well and a just culture reporting system in place.

**CZ:** According to our experience the effectiveness of remote audits is very low.

**EDIA** thanked all contributions and the very active involvement from MSs representatives.

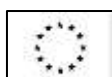
**(D1\_7) Update about ongoing CAW RMT tasks: Update about NPA [RMT.0731](#) - New air mobility**

*Presented by Alberto FERNANDEZ LOPEZ (AFL)*

**(Discussion)**



DAY1\_AI7\_RMT.0731  
subt1. New Air Mobil



**AFL** provided a presentation on RMT.0731 subtask 1: CAW for New Air Mobility which also included a proposal for a new S category in Part-66 for discussion during the meeting.

**Discussion:**

Two approaches were proposed for discussion (see slide 8 of attached presentation).

The following comments were provided in the webex chat during the discussion:

**ES:** When you say "B2/B2L could also be used for S aircraft", is it mean that we can introduce S category inside B2 and B2L? **AFL** clarified that the intention would be to extend B2/B2L to S aircraft.

**AT:** What is the TC target dates for the referred projects? **AFL** answered that each aircraft has its own specific dates

**IT:** Stated that we should not make the system more complex. Instead of introducing new license category why not analyse the existing Basic Knowledge requirements necessary for the new aircraft types. **AFL** stated that he understood **IT** point and somehow could seem easier path. However, **AFL** also explain that there are some disadvantages in this approach: first we have to take one of the existing categories which in the long term might not be the best option from the point of view of imposing basic knowledge that are not related to the aircraft type which is not an helicopter, it is not an aeroplane.

**ES:** The experience requirements are not defined from B2. Does it mean that B2 or B2L licence is supposed to cover the experience required for cat S? The same for basic knowledge, is it included from B2 & B2L categories?

**CH:** Agreed with IT. The new type of aircraft should be integrated in existing categories.

There still are systems in future AC (mechanical or electrical) and the qualification skills can be covered in the existing license system.

**CZ:** Agreed with IT.

**FR:** Apart from the Part-66 licence subject, will a new category of aircraft be introduced, or these "special" aircraft will fit into the existing ELA1/ELA2/CMPA etc. system? **AFL** clarified that the review of the concept of CMPA will have to done as it is disappearing from the rules. When asked about the question being related to the use of Part-ML for this type of aircraft **FR** confirmed that was implicit in the question but in more general, the way as it affects the complete Regulation 1321/2014.

**EDIA** thanked everybody for the active participation.

<b>(D1_8) Feedback about comments received in the EASA Committee in February to SMS in Part-145 and POA</b>	<b>(Information)</b>
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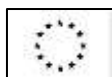
*Presented by Youri Auroque (YAUR) & Jeremie NEVEUX (JNE)*

The audience was informed about the discussions held in the EASA committee and expert group with regards to the Opinion related to introduction of SMS in Part-21 and Part-145. This package also includes elements from cross-domain rulemaking tasks related to alignment with regulation (EU) 376/2014 occurrence reporting in all implementing rules .

**JNE** mentioned that the feedback was positive and only few comments were received, as following:

**ES** – perceived the occurrence reporting elements as duplication of requirements contained in 376/2014.

**EASA** reply there are 2 framework packages, one coming from 376/2014 and one from the Basic regulation and ICAO. This rulemaking tasks was intended to make these 2 frameworks to coexist and avoid contradictions. EASA made very minor modifications to the package and commission will transfer the proposed answer to the MS.



**FR: Part-145 comments:**

1) there were introduced new elements like AltMoc and observations, but what about the other annexes to regulation 1321/2014?

**EASA** reply: the novelties will be progressively introduced in the other Annexes but not with this package

2) related to the way we have proposed the transition provisions to introduce SMS in Part-145

**EASA** reply: the comment was considered and the cover regulation was changed in this respect.

**YAU** mentioned for Part-21 the introduction of SMS requirements for organisations differs slightly from Part 145 due to peculiarities of initial airworthiness but the regulatory frame is the same. For Section B the requirements are aligned with the other domains.

**FR** expressed their willingness to participate to the development of AMC/GM, which was positively considered via focused consultation group.

**Commission representative** mentioned that the draft amendments of the two regulations were transmitted to the legal service for review, confirming the discussion and voting of the package during June.

**(D1\_9) Discussion about the EASA Form 1 footnote (Part-21 versus Part-M)**

*Presented by Eugenia DIAZ ALCAZAR (EDIA)*

**(Discussions/  
Conclusion)**



DAY1\_AI9\_EASA  
Form 1 footnote.pdf

EDIA provided a short update on the impact of the update of EU 1321 from last year to include CAO in the footnote of the EASA Form 1 and, as a consequence, changing the issue of the form. This also impacted the approved production organisations especially those being also approved according to Part-145.

The following 2 options were presented, and it was asked the advice from the P&CA TeB for the way-forward:

Option 1: change the EASA Form 1 for POA to issue 3 and introducing it with SMS package. Harmonisation of footnotes to be done at a later stage

Option 2: no amendment now but at a later stage

FR: It seems that none of the proposed options fully address the issue as in both options, 2 different Forms remain. Maybe one solution is to:

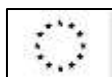
- Remove « MF/CAO/145 » and « 21 » in the footnotes.
- Keep only « EASA Form 1- Issue X » in the footnote.
- Remove the grey areas in both documents.

If we provide a period of time during which both issues are valid, why should we wait and do the necessary changes only “at a later stage”?

EDIA mentioned that we have to consider the impact of doing this change now, and this will mean that everybody will have to change the form. It is a good option but having in mind the impact of mutual recognition and not only in EU, we have to ask for a legal advice to see if it will be possible to accept of having two different forms valid in parallel for a limited period of time.


Expressed advice from the audience was:


Option 1 - none

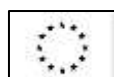


<p>Option 2 – LU, FI, IS, LV, NL, HU Agree with FR: IT, IE, CZ, ES, BE</p> <p><b>Conclusion:</b> we'll ask legal if the proposal from FR with two different issues to be used during the transition period will work.</p>
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<b>(D1_10) Closure of first day</b>	<b>(Information)</b>
<p><b>RER</b> thanked all attendants for the active participation highlighting that it was a very rich discussions with good variety of subjects. <b>EDIA</b> mentioned the availability of EASA staff to collect any feedback or comment from the participants in case of need after which she closed the day.</p>	

<b>DAY 2</b>	
<b>(D2_1) POA suppliers' occurrences reporting workflow</b> <i>Presented by Carmen Chirita (CCH) &amp; Anna Marija Duranec (ADU)</i>	<b>(Discussion)</b>
<div style="text-align: right;">             DAY2_AI1_P&amp;CA TEB            2021-04 - POA suppl         </div> <p><b>CCH</b> and <b>ADU</b> presented for discussion the issue of occurrences reporting workflow for POA suppliers. A survey was also presented to be launched after the meeting with the objective of improving the system.</p> <p><b>Discussion:</b></p> <p><b>FR</b> posed one question and one remark:  <i>Question:</i> In slide 6 of the PP presentation, it appears to include duplication of information sent to the European Central Repository (ECR) coming from EASA and from NCAs. <b>FR</b> questioned if this was the intention. <b>CCH</b> clarified that there is no intention to have duplication because the arrows from EASA and NCAS refer different sources of information: for EASA is more about report received from DOA although being about the same event some commonality with the ones from NCAs is expected. <b>CCH</b> confirmed that NCAs are responsible for the uploading of the event.  <i>Remark:</i> <b>FR</b> experience shows that it is common for DOAs also approved as POAs to report POA events under their DOA approval only. <b>FR</b> suggested adding a question in the survey on that matter to evaluate if this phenomenon is marginal or not. It was agreed that <b>FR</b> make a proposal for that additional question in the webex chat.</p> <p><b>IT:</b> mentioned that the quality of the reports from POA organisations are in general of less quality since they tend to rely on the associated DOAs reporting, recognising, however, an improvement in relation to the past. It also mentioned the possibility in ECAIRS 2.0 to share information between NCAs.</p> <p><b>EDIA</b> concluded the discussions by thanking the contributions and indicating that a survey will follow.</p>	

<b>(D2_2) Feedback on "Return to Normal Operations project (RNO)" COVI D-19, including an update on the exemptions</b> <i>Presented by Luis Pires (LPI)</i>	<b>(Discussion)</b>
<div style="text-align: right;">             DAY2_AI2 EASA            COVID 19 RNO upda         </div>	



**LPI** provided information related to the RNO process and EASA actions to support the industry, including information about the exemptions issued due to COVID-19 pandemic.

**IT:** Are time limitations mentioned in slide 5 already contained in the current Guideline?

**EASA reply:** yes, this was presented in the OPS TeB; there is a policy associated to this Guideline and it was a specific OPS TeB about this subject and the policy was introduced.

It was clarified with the OPS colleagues that the policy of 2000 FH and / or 31 December 2021 is related to the published deviation. The Guideline only indirectly contains the information via a hyperlink to the page where the deviation is published. (footer of page 2 of the guidelines -

<https://www.easa.europa.eu/document-library/product-certification-consultations/deviation-transportation-cargo-passenger>)

**Note:** Last statement in slide 5 of the presentation is not correct. The correct statement should read as follows:

*As not all cargo fire events are catastrophic, it is therefore sufficiently conservative to allow each affected airplane to fly for a maximum of 2000 flight hours and/or until 31 December 2021 **after installation of the major change or STC referred in the "Guidelines for the transport of cargo in passenger compartment (Issue-5.1 dated 18.12.2020).***

**FR:** Can you clarify how NCA can issue derogations on Section B? -slide 9

**EASA reply:** Art.71(1) of Basic regulation cannot be used by the NCA to exempt the NCA to comply with the requirements from Section B. This was clarified during last year meeting and included in the meeting minutes.

**MT:** When issuing exemptions for the modification of passenger cabin to carry cargo, are we required to approach the EASA STC team to enquire what state the STC progress is?

**EASA reply:** approval of STC is under control of EASA, specifically the Certification team. In case you exhaust the time frame for Art.71(1) related to an STC, you or the organisation should contact EASA, the person in charge and you can extend or issue an Art.71(2) in order to allow the time needed.

Contact EASA for STC and issue an Art. 71(2) if needed.

Question to the floor: Do you think that this is a common topic from everyone? Is the process not smooth enough? No reaction.

**MT:** we expect that somebody will inform us if the STC process will not continue, we hope EASA will also inform us, but the EASA opinion is that we as authority have to continue asking EASA on the process.

**EASA reply** even though there is no reaction from the audience sharing MT's view this is a valid point; as a reflection on who is doing what and who responsible of what: clearly the Art. 71(1) is notified by the MS meaning that you have to be satisfied on the measures that are put in place to ensure that there is no safety problem – clear responsibility of MS.

### (D2\_3) Safety Sensitive Personnel

*Presented by Thomas IACONO - DGAC/OSAC FR*

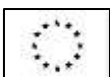
**(Discussion)**



DAY2\_A13\_2021-05  
Safety sensitive persc

**FR** expressed a concern about safety sensitive personnel – definition is in AIR OPS rules.

The policy of control by the operator does not apply for subcontracted Part-145 organisations not part of the operator approval. Basic regulation states that the operator has to extend the enforcement on the maintenance



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[FS1.1] [P&CA TeB meeting 2021-1] [Date: 28-29/04/2021]

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personnel. AIR OPS rules have significant impact on maintenance and the guideline is not sufficient to ensure level playing field.

DGAC/OSAC position:

- A common and coherent application of rules is necessary
- Even if in the long term a regulatory update is necessary, the common and coherent application of current rules can't wait for it.

Feedback to the 3 questions will be appreciated:

- Do you have any feedback from operators and/or PART-145 organisation (EASA / MS)?
- What do you apply in your national checks for audits regarding PART-145 organisation (MS)?
- Do you intend to include this subject in standardisation audits (EASA)?

**Eduard Ciofu (ECIO** - Head of Air Operations Department) thanked for the presentation and gave a short explanation on the background of the subject. This rule came after the accident of Germanwings where focus was on substance abuse. The maintenance personnel were included in the concept of Safety Sensitive Personnel, due to the conclusion that the safety sensitivity does not stop with the air crew and there are more aviation professionals having direct interaction with the aircraft which leads to the need to reinforce the barriers against risks related to substance abuse. ECIO acknowledged the point presented by FR whereby implementation of the requirements is different between the operators with Part-145 organisation integrated and the ones subcontracting the maintenance. However, this asymmetry has no or very small impact in operator's daily business as the mentioned requirements can be addressed via the contractual means.

**PL** was of the opinion that it is more related to operator's. It's the operator responsibility to include in the agreement between the Operator and MOA the additional safety requirements for the maintenance personnel.

**Conclusion:** the questions raised by FR are good, and the MS are encouraged to send their answers in the next coming days by e-mail, especially because the topic will be presented in the OPS TeB in May.

**Note:** no further comments received from the P&CA TeB.

**(D2\_4) AOB:**

- **Part-66 Examination Credits**  
*Presented by Björn Holm - Swedish CAA*
- **Question related to RMT 0734 One CAMO for airline Business Group**  
*Presented by David Juhasz – Germany LBA*

**(Discussion)**

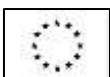
**Part-66 Examination Credits**

**SE** provided a presentation on Part-66 examination credits by posing two questions and providing the position of SE NCA.

**Discussion:**

**IT** supported the SE proposal included in the last slide of the presentation and stated that more guidance about the way which the examination credit should developed with regards to what NCA is expected to receive while evaluating other kind of national qualifications.

**ES, NL, DK, FR** and **IS** expressed their agreement with question 1 in the webex chat.



**EDIA** concluded by stating the point has been taken, will be assessed and feedback will be provided. Depending how mature the topic is it might be included in the upcoming Part-66 short discussion slot for more detailed discussions.

#### **Questions about RMT 0734 One CAMO for airline Business Group:**

**DE** posed an open question about RMT 0734 process.

**EDIA** confirmed that EASA used the support of the expert group to draft the opinion and that the plan is to have the draft opinion for consultation with the advisory bodies by June.

**DE** made sated that it will be happy to comment on the opinion once available but expressed disappointment in relation to the fact that no NPA was issued on this RMT.

**EDIA** explained that EASA is using a process which is part of the procedures. This process is not new and has been used in other stances. In addition, the subject is not new as we have been discussing it for many years now with the relevant stakeholders thus EASA believes that is ready to come with conclusions on this matter. Transparency has been ensured in all process.

**DE** provided additional comments on this matter mainly with regards the lack of alignment of EU rules with ICAO and its consequences.

**DK** Posed a question if any other authority found difficulties in explaining that a CAO or CAMO under Part ML can or must issue an ARC to an aircraft in the process of being importing from a third country without an CoA. and the inconsistency on the dates between the first ARC and CoA (with an ARC date before the first CoA issue).

**MT** expressed support of DE comments.

**ES** conformed to have the same problem and suggested that it should be clarified in RMT import of a/c.

No additional AOB.

#### **(D2\_5) Closure by EDIA and RER**

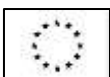
*Presented by: EDIA and RER*

**RER** closed the meeting by thanking the EASA team and all participants for their contributions. RER also mentioned a few take ways resulting from the meeting as follows:

- There is a general agreement with the approach taken by EASA in collecting information using questionnaires but is time now to offer guidance and to progress further.
- The discussion on remote audits showing some limitations but also some opportunities which should be our focus. To take into consideration the link between RBO and remote audits.
- Aviation industry and airlines have been under tremendous pressure due significant changes and new business models coming and at the same time taking advantage of the new digital solutions. We must be open minded and develop innovative solutions, always considering safety first, and offer what the industry needs.
- New ideas for the format of the TeB meeting with shorter, more focused and frequent technical discussions with the NCAs.

**EDIA** presented the plan for three short and focused technical discussions before the full meeting in November 2021. The invitation and more detailed information will be sent. It is expected that for these meetings TeB members invite other colleagues from the NCA.

**EDIA** thanked everyone and closed the meeting.



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**Appendix:** List of P&CA TeB actions closed recently, still 'Open' actions and actions opened at this meeting.

Ref	Action	Who/Status at time of Minutes approval
#1 2019-04	<i>P&amp;CA TeB members to provide feedback on application of AMC2 145.A.50(d) (national guidance, best practice, implementation issue, practical case, deviations encountered, proposed changes...).</i>	MS <b>Open</b>
#3 2019-04	<i>The item presented by PL on Electronic Signature to be included in the next meeting agenda.</i> This action can be <b>closed</b> now, since PL presented the issue during P&CA TeB meeting on 28 April 2021.	EASA/ <b>Closed</b>
#2 2019-11	<i>EASA to provide feedback to the P&amp;CA TeB members when the final text is of the White paper about ACAM guidance available.</i>	EASA <b>Open</b>
#4 2019-11	<i>EASA to coordinate with Lithuania to provide a presentation about the acceptance of aircraft status at the time of importing to EU during the next P&amp;CA TeB meeting. <b>The presentation was provided during the technical meeting about of import of aircraft on 28 September 2021.</b></i>	EASA <b>Closed</b>
#1 2020-02	<i>EASA to assess scenarios (other than those covered by AMC2 145.A.50(d)), describing how to conduct maintenance on parts that have been de-installed from an aircraft that does not have an EU-airworthiness certificate.</i>	EASA <b>Open</b>
#1 2021-01	<i>EASA to discuss internally the possibility to draft a paper on the basic principles and/or good practices related to CAMO.B.300 and CAMO.B.305 and provide feedback. <b>EASA to send out the final version of the RBO paper following NAA comments.</b></i>	EASA <b>Open</b>

