

Part-21 Implementation Workshop

New Product Model Designation

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Product Models

- A new model designation is a type certificate holder decision.
- There are no EASA criteria requiring a new product model and there is no definition regarding what kind of change should lead to a new product model designation. However, it is recognised that the aviation world works with model designations:
 - Each product has a model designation on its identification plate
 - Airworthiness Directives are applicable per model
 - Aerodromes work with models and model groupings

Past Process for Product Models

→ Product = Aircraft, Engine, Propeller

→ **Past Process:**

- The **complete product** model was considered as a change application, as per Part-21 Subpart D, requiring the complete product model to be compliant for certification.
 - This led to an unlevel playing field with foreign authorities and TC holders from non-EASA member states.
 - An application for a **new product model**, led to a more stringent compliance demonstration when compared to the same change to type certificate being considered without the introduction of a new product model designation.

Revised Approach for Product Models

→ Active process:

Future and on-going applications for a major change with the addition of a **new product model designation** are considered in the frame of Part-21 Subpart D, as changes to type certificate **considering the actual changes and their affected areas only**.

→ The amended TCDS (as part of the type certificate as per 21.A.41) will mention the new model designation with a note* that the introduction of the new model designation is based on the approval of the corresponding major change(s) to type certificate.

→ Additionally, and in line with GM 21.A.3B(d)(4) point 4.4, the applicant for a new product model designation shall

1. review and analyse all known potentially applicable Airworthiness Directives, unsafe and potential unsafe conditions in the unaffected areas of the applied major change(s), and
2. include the adequate corrective actions to those unsafe and potential unsafe conditions, to the extent practicable**, in the applied major change(s). If determined as not practicable, identify the need for AD revision(s) to extend the applicability to the new model.

Revised Approach for Product Models

- *Reason for note:
- The revised approach may lead to newly introduced product models that are not fully compliant, and may include pre-existing unsafe conditions in the non-affected areas (addressed by existing ADs), if the introduction of the corrective action to such unsafe condition is considered disproportionate within the timeframe of the targeted major change approval.
- The note provides clarification that EASA certifies the changes and its affected areas that lead to a new product model designation, but does not approve the unaffected areas of the actual design changes that may include non-compliances and/or unsafe conditions which would need to be addressed via the continuing airworthiness process.
- A new product model may therefore be added to an existing airworthiness directive at the time of introduction.

Revised Approach for Product Models

→ Summary

- In the past, a complete product model was approved
- Now, a change is approved leading to a new model designation
- Consequence: Only the change and the area affected by the change needs to be demonstrated as fully compliant, the complete product model may have residual non-compliances

REMINDER

→ An unsafe condition in the affected area of a change leads to **NO** approval!

REFERENCE

→ On EASA website:

→ WI.CERT.00172

→ Chapter 3.1.1.5

“Certification Process for TC, RTC, STC,
Changes, Repairs, ETSO Authorizations”

Thanks for your attention

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