



**European Aviation Safety Agency  
Rulemaking Directorate**

**EXPLANATORY NOTE**

**CS-25 Amendment 6**

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**1. GENERAL**

Executive Director Decision 2009/010/R amends Decision No 2003/02/RM of 17 October 2003 (CS-25 Initial Issue) as last amended by Executive Director Decision 2008/006/R of 05 September 2008 (CS-25 Amendment 5). It represents Amendment 6 of CS-25 Large Aeroplanes, and incorporates the output from the following EASA rulemaking tasks:

<b>Rulemaking Task No.</b>	<b>TITLE</b>	<b>NPA No.</b>
25.006	Thermal /Acoustic Insulation Material	2008-13
25.008(c)	Flight in icing conditions	2008-05
25.056(b)	Fuel Tank Flammability Reduction	2008-19

Each Notice of Proposed Amendment (NPA) has been subject to consultation in accordance with Article 52 of the Basic Regulation<sup>1</sup> and Article 15 of the Rulemaking Procedure established by the Management Board<sup>2</sup>. For detailed information on the proposed changes and their justification please consult the above NPAs which are available on the Agency's website.

The Agency has addressed and responded to the comments received on each of the NPAs. The responses are contained in a comment-response document (CRD) which has been produced for each NPA (CRDs 2008-13, 2008-05 and 2008-19) and which are also available on the Agency's web-site.

<sup>1</sup> 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, 19.03.2008, p. 1

<sup>2</sup> 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 08-2007-03, 13.6.2007.

## 2. CRD REACTIONS

- In response to the CRD 2008-13, the Agency received the following substantive comment, which is reproduced below together with the Agency's responses:

CRD Comment No.	Commenter	Comment	EASA Response
36	Airbus	<p>In its comment n°36, Airbus emphasized its strong opposition to the note included in the proposed paragraph (c)(3) that reads:</p> <p><i>"For blanket materials that cannot be installed in accordance with figure 7 above, the blankets must be installed in a manner approved by the Agency."</i></p> <p>Airbus maintains its comments and insists on the fact that this note introduces an unfair treatment between the originator of the suggested design and its competitors. As mentioned in the comment, the Figure 7 reflects one manufacturer's particular design. The AC 25.856-2A provides other alternatives that are also acceptable by the FAA.</p> <p>We request the deletion of the note and its replacement by a cross-reference to the AC 25.856-2A that shows acceptable design alternatives.</p>	<p>The Agency still confirms that AMC 25.856 (b) gives directly a link to AC 25.856-2A and estimates there is no need to give an additional cross reference to this AC in the appendix F as suggested by Airbus.</p> <p>Both figure 7 and AC 25.856-2A constitute approved methods of compliance without any preferred option. There is no unfair treatment, this is up to the manufacturer to select their method, as per appendix F, ACs or any other approved methodology.</p> <p>As explained in the context of some comments received about this NPA, the Agency considered the harmonization of the text with FAA as fundamental for the manufacturer.</p>

- In response to the CRD 2008-05, the Agency received the following substantive comment, which is reproduced below together with the Agency's responses:

CRD Comment No.	Commenter	Comment	EASA Response
General	Airbus	<p>In addition to our accepted comments on the current text of CS-25, we have found that the unit conversion needs to be corrected in paragraph d: 180 lbf = 801 N instead of 356 N.</p> <p>(180 lbf is the number given in FAA AC 25-25)</p>	Accepted. Correction is included in the final resulting text.

- In response to the CRD 2008-19, the Agency received the following substantive comment, which is reproduced below together with the Agency's responses:

CRD Comment No.	Commenter	Comment	EASA Response
25	Air Safety Group	<p>The ASG thanks EASA for providing more information about their forthcoming plans to extend flammability reduction to (some) of the existing fleet. However, the ASG remains fundamentally concerned that the underlying problem - FAA not writing ADs for B737 and B747 flammability - is not being properly addressed. The ASG recognises that only the FAA can solve this fundamental problem, but we would have hoped that EASA would have taken the FAA to task for not correcting the unsafe condition (high tank flammability) by issuing ADs. Why did EASA not ask the FAA why they have introduced flammability improvements for the B737 and B747 fleets on the US Register? What justification can there be for the FAA failing to propose the same requirements to fleets outside the US, including those in Thailand and the Philippines, countries whose fleets have experienced explosions? Whilst EASA may be able to introduce safety measures for European fleets, there may be many Nations that rely on the promulgation of airworthiness information by AD, as prescribed by ICAO and who may not take any corrective action. When the FAA has already issued many fuel tank safety ADs it is quite baffling why they have not issued one for fuel tank flammability. The ASG will await the proposed NPA relating to new requirements for retrofit and production cut-in of flammability reduction.</p> <p>ASG reaction: Not yet satisfied on this point.</p>	<p>As explained in the CRD, the EASA decision concerning the retrofit and the production cut-in will be dealt separately in the frame of another rulemaking task. This task was previously identified as 25.056(a) but has recently been renamed <u>26.008</u> because of its scope which is related to the future CS-26. The NPA is being prepared and will be published by 4Q09. The decision is targeted for 1Q12 (delayed due to the delay in the adoption of the Safety Directives and CS-26).</p>
28	Air Safety Group	<p>ASG reaction: It is still not clear what is required to be presented. If</p>	<p>The objective is to ensure that holders of a type certificate,</p>

CRD Comment No.	Commenter	Comment	EASA Response
		<p>EASA wants to receive meaningful data arising from the introduction of a new type of system, specific instructions should be proposed so that a common approach can be achieved by all operators. However, harmonisation with the FAA does not seem to be sufficient reason for introducing a new kind of reporting.</p>	<p>restricted type certificate, supplemental type certificate and of any other relevant approval deemed to have been issued under Part-21 (Annex to Commission Regulation (EC) 1702/2003) which have included a FRM in their design will monitor the reliability of their FRM system to ensure it actually meets the average flammability exposure required by chapter M25.1 of the new CS-25 Appendix M; this is justified by the fact that we have no in service experience from FRM system.</p> <p>This means that an adequate collection system must be demonstrated, and a regular reporting shall be done during the first years.</p> <p>The details of the report content are to be determined by the certificate holder and to be agreed with the Agency; this will be adapted to the design of the concerned FRM system as well as to any practical maintenance constraints. Of course Operators should be involved and informed in this process so that they understand the required monitoring and reporting actions.</p> <p>The corresponding specific instructions will be developed by certificate holders as required by Part-21 chapter 21A.61 "Instructions for continued airworthiness".</p> <p>Then these instructions will be provided to Operators and incorporated in their aircraft maintenance programmes as required in Part-M (Annex to Commission Regulation (EC) 2042/2003); in particular this is required in chapter M.A.302</p>

<b>CRD Comment No.</b>	<b>Commenter</b>	<b>Comment</b>	<b>EASA Response</b>
			"Aircraft Maintenance Programme" and in chapter M.A.401 "Maintenance data".

**3. EDITORIAL CORRECTIONS IN CS-25 AMENDMENT 6**

Apart from the changes that resulted from the above NPAs, this Amendment 6 of CS-25 also incorporates several changes aiming to remove certain editorial errors and inconsistencies identified. Their description/justification is as follows:

- In book 1, 2 editorial errors are corrected in CS 25.807 (h) (3) and in CS 25.1309.
- In book 2 in AMC 25.629 and 25.807, two titles and one reference to CS 25 are corrected because they do not correspond to the correct paragraphs. Reference to FAA AC 25.812-2 is also removed in AMC 25.807 as it is already given in correct AMC 25.812.
- In book 2, for consistency purpose, "Cabin attendants" is replaced by "Cabin crew" as it is the term used in the entire CS-25.