

Current Status of the European Parts Rulemaking Activity

The Issue

- EASA is proposing a change to their manufacturing rules
- Creating two parts categories
 - Category A – must be produced under production approval; EASA Form 1 would be necessary
 - Category B – no production approval required; only a C of C would be necessary; would be ineligible for EASA Form 1
- The Design Approval Holder (DAH) will designate the category, and will have wide categorization discretion

Why Does it Matter?

- There appear to be a number of problems with the NPA, including:
 - Category lists would be unavailable to distributors (so members would not know which traceability documentation was right for a part)
 - EASA has suggested that distributors could ask for EASA Form 1 on all parts, but category two parts would be ineligible for Form 1
 - Makers of unapproved parts could claim the parts were category two and distributors would have no way to verify this
 - Parts could to be categorized differently by two different DAHs (e.g. a fastener used by both)
 - It is unclear what documentation the distributor would need to request; EASA has suggested that the documentation requirement would be driven by the end-use, but the distributor may not know the end-use at the time of stock purchase
 - Lack of harmonization could make it more difficult to transact parts between Europe and the rest of the world (including the US and Canada)

What Are We Doing?

- ASA filed comments on the rule
- ASA has maintained open lines of communication with EASA, FAA and the EASA rulemaking committee chair
- ASA met with EASA in Germany to discuss the rule
- ASA filed supplemental comments with both EASA and FAA on some remaining problems that will disadvantage ASA members
- ASA continues to work with EASA and FAA



Thank You

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