

No.	AD WORKSHOP PARTICIPANT QUESTIONS	EASA ANSWER / POSITION
1	How an AMOC will be accepted?	See our related AD FAQ
2	What are the differences between AD (Airworthiness Directive) and SB (service Bulletin)?	An SB is published by a manufacturer or a design approval holder and provides technical instructions and also compliance times as determined by the manufacturer. However, those are not legally binding; see our related AD FAQ . An AD is published by an airworthiness authority and requires mandatory actions within prescribed periods. EASA ADs are defined in Regulation (EU) 748/2012 , Part 21.A.3B. Whether anyone must comply with an AD, see our related AD FAQ .
3	Is there any easy way to find AFM related AD without having to re-read all of them? In case of a new fleet operation it would speed up the AD analysis process.	At this time, no such ‘filter’ exists in our SP Tool, but we may consider it for a future update.
4	During the AD comment process it would be convenient to be able to read other commenters input, to avoid duplication of questions and/or comments.	We may consider this for a future update of our SP Tool.
5	Component AD "but not limited to" creates a big analysis burden, would it be possible to reduce it's use, or at least to aircraft types/categories?	On average, only 10 State of Design ‘equipment’ ADs are released per year <u>worldwide</u> . In case an ‘equipment’ AD is limited a certain category (or categories) of aircraft, the Applicability should make that clear. EASA always considers such ‘restrictive’ Applicability for AD actions, on a case-by-case basis, when appropriate. However, this is not always possible. In addition, it should be clear that each owner/operator may be expected to know (or have access to a list, showing) which P/N are currently installed on their aircraft.
6	What is EASA’s view on reducing number of superseding AD? The number of superseding AD is increasing in past 12 months. This adds enormous burden to operators.	<p>This subject is being discussed in an international forum. The current standard (harmonised with the FAA) is shown in our CAP (see Table on page 37). If, internationally, a change of policy is decided, then EASA will amend the CAP accordingly.</p> <p>Regardless of any possible changes to our ‘system’, please note that the superseding AD are driven by TC holder’s actions (e.g. new or revised SBs) that instruct to do additional or different actions, or within reduced compliance times, or expand the Applicability. Therefore, additional actions will still be required to be completed on the aircraft.</p>

7	<p>Can EASA consider to extend the effective date of AD to 1 month after issuance if deem not urgent. Especially for ALS req, which often involves numerous items/tasks.</p>	<p>This is not being considered as a standard at this time, only for exceptional cases. For ALS Revision ADs, EASA always releases a PAD for public consultation, for a standard 4 week period. In EASA view, operators should use this same time period to review the ALS (i.e. the changes, assuming the previous ALS Rev. is already in place) and start planning.</p>
8	<p>Reporting back inspection result including no findings within 10 days after inspection is a huge burden. Why reporting is needed even inspection has no finding?</p>	<p>EASA agrees 10 days is rather short and must be considered an exception. Our standard period for reporting is 30 days after an inspection. Reporting is only required by an AD (must be specified explicitly) in case there is a demonstrated safety benefit. In most cases, the data allows the TC holder to determine the fleet condition and develop a suitable 'fix' with an appropriate implementation period, clearly proportional to the risk, taking that fleet condition into account.</p>
9	<p>For EU registered aircraft, all new applicable ADs will be published in the EASA AD SP Tool, including also appliances with no type certificate?</p>	<p>That is correct.</p>
10	<p>Please explain issuing ECI (Emergency Conformity Information). Any issued?</p>	<p>For definition of an Emergency Conformity Information, see our CAP (page 13). No ECI have been issued and none are foreseen.</p>
11	<p>According to MA 301 (5) the operators is responsible to check e.g. AD's and OD's.Q1: What are OD's (Have you an example?)</p>	<p>An EASA operational directives (OD) would be issued under Regulation (EU) 965/2012, Annex II, ARO.GEN.135 paragraph (b), whereupon EASA Member states are expected to take measures as specified in paragraph (c). ODs are currently under development, including Proposed OD (POD), but none have been issued so far.</p>
12	<p>Safety Information Bulletins (SIB's). Q: What is their role? Since they are not listed in MA 301".</p>	<p>SIB are (as the footnote emphasises) for “information only. Recommendations are not mandatory”. The legal basis for SIBs is (the basic) Regulation (EC) 216/2008, Article 15, paragraph 2 (a), “to provide persons and organisations with the information they need to improve aviation safety”. They should be reviewed by the end user to determine if safety could be improved.</p>
13	<p>Would it be possible to issue a list of non-adopted ADs, and update it at each non adopted AD issuance? We have some troubles with ARC of FAA TC aircraft.</p>	<p>EASA does not intend to create such a list, if only because there are (and most likely will be) very few cases. Operators of affected aircraft can easily filter and find them, doing an advanced search for their type/model in the SP Tool. If there is a specific case causing trouble (of whatever nature), please contact EASA.</p>

14	Can a component manufacturer release a mandatory Service Bulletin to operator despite there is no AD release?	Yes. Under European regulation, a company must have Design Organisation Approval to publish SB without prior EASA review or approval, as applicable. However, no SB is legally mandatory unless it is mandated by an AD. Please review our related AD FAQ on mandatory SBs.
15	ADs which mandate ALS documents - before incorp ALS revisions into AMP, is it req to record the accomplishment of individual tasks to demonstrate AD compliance?	Yes, unless (or until) a specific task is in the approved AMP, accomplishment is to be recorded as 'AD compliance'. Thereafter, recording would still be required (under the approved AMP), but not (or no longer) with the AD. Please note that AMC M.A.714 specifies that the intent is to keep " continuing airworthiness records in a form acceptable to the competent authority ". This implies that, apart from EASA opinion, the State of Registry authority of your aircraft has to accept your recording practice(s).
16	Is it planned to adopt the advanced search function of the safety publication tool to filter ADs for e.g. AFM impact, W&B impact, ALS impact?	See EASA reply to question 3.
17	What is the EASA position regarding to Appliances AD? Are Operators obliged to consider them all regardless to the aircraft types that are operated?	EASA confirms that, unless the Applicability is restricted (e.g. only if installed on rotorcraft) or otherwise excludes certain aircraft, each appliance AD must be considered for each aircraft. See also EASA reply to question 5.
18	Does FAA AD (or CAAC) always lead to an EASA AD? For a non EU plane (Boeing) what is the applicability for aircraft registered in EU and AD issued by FAA/CAAC?	<p>It is EASA policy to 'adopt' each State of Design AD (FAA, Transport Canada, ANAC Brazil, etc.) or publish a different decision, before the AD effective date. These principles are the subject of ED Decision 2/2003 dated 14 October 2003. This decision allows the Agency to recognise SoD ADs as 'equal to an EASA AD' and avoids the need to publish our own document to 'cover' the AD, as was common practice in many countries pre-EASA. Note that Regulation (EC) 748/2012, Part 21.A.3B, paragraph (a), defines an AD as "a document issued or adopted by the Agency".</p> <p>If an AD is issued by a State that is <u>not</u> the State of Design, it cannot be adopted – if necessary, EASA will publish a separate AD for aircraft registered in EASA Member States.</p> <p>For related information, see our AD Home Page and our AD FAQ.</p> <p>PS: Since, at this time, no Chinese type designs are validated in Europe, so CAAC ADs cannot (nor need to) be adopted by EASA.</p>

19	Does EASA consider putting lowest threshold to do inspection to prevent premature applications? Early inspection may result with no finding.	EASA confirms that, when appropriate, an AD can impose a lower limit (i.e. do not accomplish before accumulating...etc.) for certain actions.
20	EASA is working only on product but not on personnel working on product, is there any plan?	The question is not understood.
21	When is the issuance of the risk classification scheme planned?	EASA was not sure what was meant by the question and showed a slide from AMC 25.1309 which is used with respect to design safety and combines hazard classifications with probabilities in a table. In the frame of the European Plan for Aviation Safety, EASA has developed the European Risk Classification Scheme (ERCS) which identifies certain occurrences as root causes of aircraft accidents. The adoption can be expected for 2018.
22	Who are the attendees of Product Safety Board meetings? Is it common or expected for component manufacturers who has ETSO certified product to attend?	Safety Boards are EASA <u>internal</u> meetings which are chaired by the Head of the Department for the related product and supported by a secretary.
23	Is there a definition in place in how far a CAMO may sign off completion of an applicable AD if compliance is assured by simple means (e.g. check of WDM/IPC)?	AD instructions are mandatory and can only be deviated from through an AMOC approval.
24	Why are AD's not supported by flow charts, which are easier to read than the huge pages of text. The SB element of ICA's should cover the detail level	EASA agrees that flow charts can ease the work of the operator. At this time, it is preferred that the TC holder provides such flow charts (e.g. in the SB) and, when accepted and appropriate, an EASA AD may include reference to that SB flowchart for compliance.
25	How SDM will work? Will it be for some particular person or for anyone?	SDM is designed as a web-based application that can be used by authorized users with defined access rights. For individual occurrences and identified safety issues, it will contain occurrence information and technical correspondence in a common data base to avoid multiple communication lines and provide traceability. Therefore, it is planned to have users within EASA, NAAs, and manufacturers. Manufacturers will only have access to occurrences of their own products. NAAs will have access right granted that correspond to their responsibilities.

26	For major STC, who is responsible to apply to EASA for AMOCs? STC Holder? Aircraft owner? Operator?	<p>Anyone can apply for an AMOC – note that the AMOC is not a technical approval. The purpose of an AMOC is to establish whether the alternative method (already approved at the time of AMOC application, or to be approved in parallel) provides ‘equivalent safety’ as compared to the action(s) required by the AD. Note that an AMOC does not need to address all AD requirements – an AMOC can be applied for, related to a single AD paragraph.</p> <p>For further information, see our AMOC FAQ.</p>
27	Is it possible to search in the SP tool on Part number?	<p>Yes, using the keyword field. However, it should be remembered that the full text of many historic ADs is not in the SP Tool. EASA did not get the facilities to do that until the latest update in September 2008. Any AD issued before may therefore not be text-searchable.</p>
28	For example FAA issue one AD but a German operator is to follow FAA AD, EASA AD, LTA etc. Any joint AD numbering (by agreement between FAA, EASA, ANAC, TCCA, and sub LBA...etc.) is considered?	<p>No joint numbering is considered, although much has been put into place to avoid confusion. According to Regulation (EU) 1321/2014, Part M.A.301, paragraph 5, the applicable ADs (i.e. those issued or adopted by EASA – see EASA reply to question 18), must be complied with.</p>
29	When issuing an AD, what kind of concerns does EASA have on Materials/components availability at OEMs to cope with limits imposed by the AD	<p>In nearly all cases, where (possibly limited) parts supply is a factor to allow compliance with an AD, this will be taken into account and a balance will be determined between safety and logistics/economics. This will likely be reflected in the compliance time. For individual cases, an exemption can be requested from the State of Registry NAA under the BR, Article 14(4).</p>
30	How/when will the reporting requirements from Part 21 [be] aligned with those from Regulation 376?	<p>Based upon the NPA 2016-19 on aligning Implementing regulations, AMCs and GM with Regulation (EU) 376/2014 and comments received during the consultation period, EASA is currently working on the opinion which is scheduled for Q1-2018.</p>
31	About Adopted SoD AD where the TCH is not a DOA: Temporary repair recalled by the AD with a reference to a TCH document, could the repair be considered as an EASA approved repair?	<p>Yes, when this falls within the scope of a Bilateral Agreement.</p> <p>No, in case the repair is not covered by a Bilateral, the repair must be approved (i.e. validated) by EASA.</p>
32	The use of later revision of a SB is allowed, even if not clearly specified?	<p>No. Only if the AD specifies that the use of a ‘later approved revision’ (of the SB that contains the ‘required’ instructions) allowed. This does <u>not</u> involve authorisation to use any changed compliance time or Applicability (Effectivity) of that revised SB. For such cases (see also EASA reply to question 6), further AD issuance is expected.</p>

33	Does EASA consider another threshold to prevent premature applications especially [when] structure related. Example, threshold is 36.000 Total FC but not earlier than 30.000 Total FC as similar. Thanks	Confirmed. See EASA reply to question 19.
34	Seen the different answers, some AD being not clear enough, why not incorporating some guidelines to indicate practically what actions are required, clearly stating those guidelines are not mandatory?	Agreed. EASA recently published its AD Writing Instructions , which should provide such guidance, explaining why certain wording is used. This document will be updated, justified by logical and appropriate arguments, as and when necessary. This document may also be subject to changes, due to international developments, see EASA reply to question 6.
35	Potential IFSD are always to be considered to have impact on safety?	<p>An engine in-flight shut-down (IFSD) always increases the risk of a potential unsafe condition for the aircraft. To limit the consequences of one engine IFSD, design precautions are imposed on the aircraft. The result is that the aircraft safety level will be found acceptable as long as the number of engine IFSD remains low.</p> <p>EASA is regularly reviewing every engine type IFSD rate in order to react when this rate may become so high that the aircraft safety level would be affected in an unacceptable manner. ADs are sometime published to reduce the risk of engine IFSD.</p> <p>As particular guidance on how this issue is addressed on engines installed in Rotorcraft, the EASA Certification Memoranda EASA CM-PIFS-011 refers.</p>
36	Some ADs state if records can confirm not applicable then no physical inspection is required. Some only infer this. Can they not all state this officially?	<p>Understood. EASA will take measures to ensure that this standard is applied as much as possible, where appropriate, i.e. in cases where an AD requires an inspection to identify the part.</p> <p>However, it should be clearly understood that, in case an AD does <u>not</u> explicitly require identification of a part (e.g. listing 'affected' P/N in a Note), by default, <u>any</u> method for identification of P/N is acceptable. EASA does not intend to change that practice.</p>
37	Adopted SoD AD/TCH is not DOA: if, after EASA AD,TCH change instructions recalled by the EASA AD (e.g. same doc number new issue date), is EASA AD "satisfied" by new document? (no SoD AD rev)	<p>Yes, when this falls within the scope of a Bilateral Agreement (e.g. through mutual acceptance of AMOC approval for revised SB usage).</p> <p>No, in case this falls outside the scope of a Bilateral, the revised SB must be reviewed/approved (i.e. validated) by EASA.</p>

38	Do you have fixed guidelines on how to decide if an AD should be an "Emergency" AD?	Guidelines exist, although they are not 'fixed' in the sense that they must be rigidly applied. In general, for a compliance time of anything <u>less than</u> 25 FC, 25 FH or 30 days, EAD action will be considered. Note that for a long-range aircraft, even 50 FH would likely be only 4 or 5 flights (FC) and therefore still qualify for EAD. By comparison, for a GA aircraft, 25 FH might take 2 years to accumulate. Common sense is applied. For detail, see CAP .
39	Why does ADs sometimes repeat the accomplishment instruction already defined by the DAH in the related Service Bulletin, e.g. reduced life of critical engine parts?	EASA avoids repeating SB instructions. However, the AD must include the five elements specified in Regulation (EU) 748/2012 , Part 21.A.3B paragraph d. For this reason, EASA cannot issue an AD by simply stating 'do the SB' as was sometimes done in pre-EASA times.
40	AD recalling AWL/ALS and stating these are mandatory limitations are sometimes issued by EASA, is there some reason for this kind of AD (AWL/ALS are mandatory by definition) ?	Yes, see our related AD FAQ .
41	Are EU NAAs are allowed to overwrite EASA ADs? If yes, which AD need to be accomplished by the operator?	Only EASA is empowered and privileged to issue or adopt "Airworthiness Directives" within the EU aviation system. However, a Member State may exercise its right according to Article 14, Flexibility provisions, paragraph 1, " reacting immediately to a safety problem which involves a product, person or organisation subject to the provisions of this Regulation ". In such case, the Member State may authorise deviations from EASA ADs, but in these cases the State shall immediately notify EASA, the EU Commission and all other EASA Member States of the measures and the reasons therefore.
42	Considering ICAO standards, whose responsibility is ADs dissemination to aircraft owner or operator? State of register or state of design? Or maybe it is the responsibility of the operator?	See the EASA AD 'Home' page and the Disclaimer & copyright notice statement on EASA SP Tool (link at bottom RH corner of page). Relevant extracts: " EASA has developed the Safety Publications application as a service to enhance the aviation industry's receipt of European Safety Publications ", and " The dissemination of ADs to aircraft operators and owners is a responsibility of the State of Registry and does not belong to the Agency ".
43	A remark. It worries me that quit a high number of different interpretations exist!	This is why we organise AD Workshops; to improve understanding of all parties. Note that the selected answers (AD Reading Exercise) actually show a high level of understanding.

44	Why are ADs not translated into EU languages in order to avoid mistakes especially in the General Aviation?	This was considered by the EASA Management Board and, based on a legal advice (certain existing jurisprudence for technical requirements), it was decided that this was not necessary for EASA ADs.
45	Today's exercise and experience shows that there can be many interpretation of AD's. The cause is on individuals, culture, etc...Does EASA continuously work on making the text more "universal"?	EASA confirms that an international process is in place to discuss AD standards, including writing standards. This does not diminish the fact that the major cause of misinterpretation is likely that most AD readers are not native English speakers. In EASA view, there is a task for State of Registry NAAs to provide courtesy translations for those that do not possess sufficient English to comply.
46	Must a 145 ensure AD compliance of a part before issuing an EASA Form 1?	<p>An EASA Form 1 shall be issued at the completion of any maintenance on a component whilst off the aircraft. The maintenance organisation (MO) has to perform the tasks ordered by the CAMO and it is not the MO's responsibility to manage the configuration of the aircraft.</p> <p>The fact that a part has a Form 1 is not an authorisation to install that part on an aircraft.</p>