



9th November 2011
ICCAIA/AC/057

Process Support
Rulemaking Directorate

EASA

Postfach 101253

50452 Cologne

Germany

Subject: ICCAIA Airworthiness Committee Comments on EASA NPA 2011-14 – Halon

Dear Sir or Madam,

The ICCAIA Airworthiness Committee would like to draw your attention on international compatibility aspects linked to your NPA 2011-14.

Our members are aware that this NPA is the administrative tool to introduce the European Commission decisions on Halon Replacement into the EASA Certification Specification framework. However, we are concerned about significant differences between ICAO standards in Annexes 6 and 8, and the European legislation as now transposed via this NPA.

The key issue is:

- The ICAO standards address new type certificates and newly produced aircraft;
- The EC Regulation addresses new type certificates after the cut-off dates, and all in-service aircraft after the end dates.

Commercial aviation is organized globally. Over the decades, ICAO standards have been developed and demonstrated as worldwide accepted standards to ensure an adequate level of safety and environmental protection while avoiding unequal treatment and disturbances to economic competition.

Manufacturing industry will experience significant economic burden to implement the Commission Regulation and to provide, as a second standard, ICAO compliant products for non-EU customers.

In particular, all manufacturers expect significant burden with regard to offering retrofit solutions for in-service aircraft. As the regulations and standards are written now, only the EU is defining retrofit requirements.

ICCAIA members made significant progress in developing alternatives to the use of halon as a fire extinguishing agent in civil aviation. The ICAO standards were adopted after careful consideration of the progress and expectations for each halon application.

We expect different standards or regulations will not benefit striving for a safe and environmentally acceptable solution.

Further, having in mind the importance of commercial aviation for the global economy, ICCAIA supports worldwide harmonization through implementation of ICAO standards.

In NPA 2011-14, paragraphs 81 through 88, EASA asks stakeholders to express their preference between alternative A (i.e. do not affect newly produced aircraft based on existing type certificates and notify a difference to ICAO until 2020/2025) and alternative B (i.e. take action in the EU to comply with the new ICAO SARPs before 2020).

For the reasons expressed above, ICCAIA supports alternative B, provided the end dates are withdrawn.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Schmitt', with a stylized flourish at the end.

Claude Schmitt
Chairman, ICCAIA Airworthiness Committee