

ICB

Industry Consultation Body

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Mr Maurizio Castelletti
European Commission
DG Mobility and Transport (MOVE)
Head of Unit E2 - Single Sky and modernisation of Air Traffic Control
Rue De Mot 24
1040 Brussels
Belgium

30 September, 2016

Subject: EASA RMT on Conformity Assessment

Dear Mr Castelletti,

Dear Maurizio,

In September 2015 the ICB approved a position paper on the Future of Conformity Assessment, in response to the intended transfer of responsibility for conformity assessment from SES to EASA competence with SES 2+ and an amended EASA Basic Regulation (BR).

The position paper supported the creation of an EASA Rule Making Task (RMT) to develop requirements and guidance material for the declaration or certification of systems and constituents. It recognised that there are lessons to be learnt from existing processes and therefore there is an opportunity to improve the conformity assessment process reducing administrative burden and increasing effectiveness of interoperability compliance.

A key conclusion was that a clear understanding for the future process is necessary to avoid confusion. This includes a clear and efficient transition to the new system. Therefore, the ICB recommended that the Commission request EASA to initiate an RMT as soon as possible. The ICB, through its Technical Sub-Group, committed to actively participate in the EASA consultation activities building on current experiences.

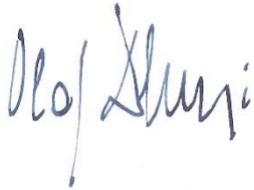
ICB members were therefore pleased that such an RMT was originally included in the draft Rule Making Programme, but subsequently disappointed that it was deleted from the final published programme. My understanding is that this due to some uncertainty over how the task relates to the BR amendment, and a desire to first have the BR and then the RMT.

Unfortunately this postponement has led to increased confusion and loss of momentum. Our firm belief is that the work can, and should, be started now and eventually fitted to the final BR amendment with only minor amendments. There is no need to 'second guess' and our position paper clearly set out both a scope and a set of recommended improvements.

I therefore ask you to request that EASA re-schedule the RMT to start as soon as possible. A proactive approach is needed in this case, and should be underpinned by the principle of 'evolution not revolution' that our members believe is needed for efficiency and effective interoperability compliance.

Of course, the ICB, through its Technical Sub-Group, remains at your service on this topic.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Olaf Dlugi". The signature is fluid and cursive, with the first name "Olaf" and the last name "Dlugi" clearly distinguishable.

Olaf Dlugi
Chairman,
Industry Consultation Body

Enc. ICB Position Paper on the Future of Conformity Assessment (September 2015)