



Notice of Proposed Amendment 2025-12 (A)

issued in accordance with Article 6 of MB Decision 01-2022

Regular Update of the Continuing Airworthiness Regulation

RMT.0735

WHAT THIS NPA IS ABOUT

This Notice of Proposed Amendment (NPA) proposes to amend Commission Regulation (EU) No 1321/2014 and the associated acceptable means of compliance (AMC) and guidance material (GM) to ensure that the continuing airworthiness regulatory framework remains fit for purpose, cost-effective, and implementable by the affected stakeholders, while simplifying certain provisions and maintaining the associated level of safety.

The proposed regulatory material is expected to improve the clarity and consistency of the rules and to facilitate their implementation by the affected stakeholders through amendments to:

- correct or clarify miscellaneous topics and identified issues of a non-controversial nature;
- address outstanding items from legacy rulemaking tasks (i.e. RMT.0096 and RMT.0217);
- keep the rules consistent with the latest ICAO Standard and Recommended Practices (SARPs);
- implement rulemaking actions decided as outcomes of the EU safety risk management (SRM) process, support the digitalisation of certain processes;
- delete obsolete provisions;
- simplify specific provisions (e.g. replacing the list of aircraft type ratings included in Appendix I to AMC to Part-66 with a web-based version on the EASA website).

REGULATION(S) INTENDED TO BE AMENDED

- [Commission Regulation \(EU\) No 1321/2014 \(Continuing Airworthiness\)](#)

ED DECISION(S) INTENDED TO BE AMENDED

ED Decisions that issue the AMC & GM to support the application of that Regulation

- [ED Decision 2015/029/R — AMC & GM to Part-M, Part-145, Part-66, and Part-147](#)
- [ED Decision 2016/011/R — AMC & GM to Part-T](#)
- [ED Decision 2019/009/R — AMC & GM to articles](#)
- [ED Decision 2020/002/R — AMC & GM to Part-ML, Part-CAMO, and Part-CAO](#)

and

- [ED Decision 2003/012/RM — General AMC for Airworthiness of Products, Parts, and Appliances](#)

AFFECTED STAKEHOLDERS

Aircraft maintenance organisations (AMO), continuing airworthiness management organisations (CAMO), combined airworthiness organisations (CAO), aircraft maintenance training organisations (AMTO), aircraft maintenance licence (AML) applicants and holders, aircraft owners, aircraft operators, pilot-owners, national competent authorities (NCA), and EASA.

WORKING METHODS

Development	Impact assessment(s)	Consultation
By EASA	Light	Public – NPA

RELATED DOCUMENTS / INFORMATION

- [ToR RMT.0735 Issue 1](#), issued on 1 December 2023.

PLANNING MILESTONES: Refer to the latest edition of EPAS Volume II.



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1. About this NPA

1.1. How this regulatory material was developed

The European Union Aviation Safety Agency (EASA) identified the need to mitigate a set of non-controversial issues (described in Chapter 2), and having assessed the impacts of the possible intervention actions, identified rulemaking as the necessary intervention action.

This rulemaking activity is included in the 2025 edition of Volume II of the European Plan for Aviation Safety (EPAS)¹ under Rulemaking Task (RMT).0735.

EASA developed the regulatory material in question in line with Regulation (EU) 2018/1139² (the Basic Regulation) and the Rulemaking Procedure³, as well as in accordance with the objectives and working methods described in the Terms of Reference (ToR) for this RMT⁴.

When developing the regulatory material, EASA solicited and received written input from the competent authorities of the Member States through the Production and Continuing Airworthiness Technical Body (P&CA TeB). EASA also considered written inputs received separately from European industry stakeholders.

1.2. How to comment on this NPA

The draft regulatory material is hereby submitted for public consultation.

NPA 2025-12 is divided in three parts (A), (B), and (C). The present NPA 2025-12 (A) includes the background information pertaining to the regulatory proposal. NPA 2025-12 (B) and NPA 2025-12 (C) include the proposed amendments, respectively to Commission Regulation (EU) No 1321/2014⁵ and the associated AMC and GM, and to AMC-20 (Airworthiness of Products, Parts, and Appliances).

Please submit your comments using the **Comment-Response Tool (CRT)** available at <http://hub.easa.europa.eu/crt/>⁶.

To facilitate the collection and technically support the subsequent review of comments by EASA in an efficient, controlled, and structured manner, stakeholders are kindly requested to submit their

¹ [European Plan for Aviation Safety \(EPAS\) 2025 – 14th edition | EASA \(europa.eu\)](#)

² Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<http://data.europa.eu/eli/reg/2018/1139/oj>).

³ EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 ([EASA MB Decision No 01-2022 on the Rulemaking Procedure, repealing MB Decision 18-2015 \(by written procedure\) | EASA \(europa.eu\)](#)).

⁴ [ToR RMT.0735 'Regular update of the Continuing Airworthiness Regulation and associated AMC and GM' Issue 1](#)

⁵ Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1) (<http://data.europa.eu/eli/reg/2014/1321/oj>).

⁶ In case of technical problems, please send an email with a short description to crt@easa.europa.eu.



comments to the respective predefined segments of the NPA within the CRT, and refrain from submitting specific comments or all their comments to the 'General Comments' segment.

Further, once all comments are assigned to the respective predefined segments, there is no need to submit them (as a pdf attachment) to the 'General Comments' segment.

The deadline for the submission of comments is **31 March 2026**.

1.3. The next steps

Following the consultation of the draft regulatory material, EASA will review all the comments received and will duly consider them in the subsequent phases of this rulemaking activity.

Considering the above, EASA will issue an Opinion proposing amendments to Commission Regulation (EU) No 1321/2014. The Opinion will be submitted to the European Commission which shall consider its content and decide whether to issue amendments to that Regulation.

Following the amendment of Commission Regulation (EU) No 1321/2014, EASA will issue a Decision amending the acceptable means of compliance (AMC) and guidance material (GM) to support the implementation of the Regulation.

When issuing the Opinion and the Decision, EASA will also provide feedback to the commentators and information to the public on who engaged in the process and/or provided comments during the consultation of the draft regulatory material, which comments were received, how such engagement and/or consultation was used in rulemaking, and how the comments were considered.



2. In summary — why and what

2.1. Why we need to act

Commission Regulation (EU) No 1321/2014 (the Continuing Airworthiness Regulation) establishes the requirements for the continuing airworthiness of aircraft, aeronautical products, parts, and appliances and for the approval of organisations and personnel involved in these activities.

EASA considers it necessary to amend this Regulation and the associated AMC and GM to ensure that the continuing airworthiness regulatory framework remains fit for purpose, cost-effective, and efficiently implementable by the affected stakeholders.

EASA has also identified the need to simplify this regulatory framework through the implementation of its Rule Simplification Programme⁷.

In addition, the continuing airworthiness provisions must remain aligned with the latest applicable ICAO Standard and Recommended Practices (SARPs).

Therefore, amending this Regulation and the associated AMC and GM is deemed necessary to ensure continued efficiency, proportionality, and safety.

2.1.1. Description of the issue

Over the last few years, diverse and numerous topics and issues have been identified across the articles and the eight annexes to the Regulation (i.e. Part-M, Part-145, Part-66, Part-147, Part-T, Part-ML, Part-CAMO, and Part-CAO).

Those topics and issues stem from:

- EASA internal reviews and rulemaking activities which have identified the need to correct shortcomings as regards the clarity and completeness of certain requirements, AMC, and GM;
 - EASA initiatives on the simplification of the regulatory framework, driven by EASA's Rule Simplification Programme;
 - EASA initiatives on the digitalisation of certain processes;
 - lessons learnt from the application of the current rules, for example implementation issues observed during standardisation activities, the oversight of organisations by EASA acting as the competent authority, and queries received from stakeholders;
- feedback received from stakeholders through advisory bodies consultations and meetings, or in the form of rulemaking proposals (candidate issues);
- safety recommendations made to the Agency (i.e. UNKG-2021-018 and UNKG-2021-019);
 - outcomes of the EU safety risk management (SRM) process as regards the identification and mitigation of prioritised safety issues;
 - outstanding items from RMT.0096 '*Amendments (IRs and AMC & GM) in line with the process of granting foreign Part-145 approvals*' and RMT.0217 '*CAMOs' and Part-145 organisations' responsibilities*';

⁷ [EASA Rule Simplification Programme](#)



- consideration of applicable amendments to the ICAO SARPs related to continuing airworthiness that are not the subject of dedicated RMTs.

Besides, it is to be highlighted that, since its adoption, the successive amendments to Regulation (EU) No 1321/2014 have:

- inadvertently introduced non-controversial regulatory incoherences or inconsistencies between the requirements set out in its annexes.
- retained Subpart F and Subpart G in Annex I (Part-M), which are no longer applicable since 24 March 2022 because they were superseded by the requirements introduced with Annex Vc (Part-CAMO) and Annex Vd (Part-CAO).
- left certain parts of the rules with outdated references to other EU regulations (including the Basic Regulation).

2.1.2. Who is affected by the issue

Aircraft maintenance organisations (AMO), continuing airworthiness management organisations (CAMO), combined airworthiness organisations (CAO), aircraft maintenance training organisations (AMTO), aircraft maintenance licence (AML) applicants and holders, aircraft owners, aircraft operators, pilot-owners, national competent authorities (NCA), and EASA.

2.1.3. How the issue could develop

If no action is taken, the affected stakeholders will continue to face challenges in the implementation of Commission Regulation (EU) No 1321/2014 and the associated AMC and GM, potentially leading to a lack of efficiency and a non-level playing field.

2.1.4. Conclusion on the need for rulemaking

EASA concluded, as explained further in Chapter 3 below, that an intervention was necessary and that non-regulatory actions cannot effectively address the issue.

Therefore, amendments to the Regulation and the applicable AMC and GM are required.

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. The regulatory material presented here is expected to contribute to achieving these overall objectives by addressing the topics and issues described in Section 2.1.

Furthermore, this RMT aims to ensure a better understanding and application of its requirements and, therefore, contribute to an improvement in the level of safety associated with continuing airworthiness activities.

More specifically, with the regulatory material presented here, EASA intends to:

- improve the consistency between the 8 annexes to the Regulation (Part-M, Part-145, Part-66, Part-147, Part-T, Part-ML, Part-CAMO, and Part-CAO).
- support the simplification of the regulatory framework as regards continuing airworthiness.



- enable further clarity and completeness regarding several topics of non-controversial nature.
- ensure the rules are written in accordance with appropriate and consistent terminology.
- update references to the relevant EU regulations.
- align the rules with applicable amendments to the ICAO SARPs, safety recommendations, and regulatory actions defined through the EU SRM process.

As a result, Commission Regulation (EU) No 1321/2014 and the associated AMC and GM are expected to benefit from improved content and targeted simplification.

2.3. How we want to achieve it — overview of the proposed amendments

The regulatory material proposed to amend Commission Regulation (EU) No 1321/2014 and the associated AMC and GM aims to address and improve the non-controversial topics and issues identified in Section 2.1 in accordance with the objectives defined in Section 2.2.

The following proposed amendments are further described hereafter:

- **As regards the deletion of Annex I (Part-M) Subpart F and Subpart G**

Subpart F and Subpart G of Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 have not been applicable since 24 March 2022, when they were superseded by the provisions contained in Annex Vc (Part-CAMO) and Annex Vd (Part-CAO).

The proposal is to entirely delete Subpart F and Subpart G from Section A and Section B of Part-M.

Additionally, all references to those provisions are proposed to be deleted from the Regulation and the associated AMC and GM across all annexes.

This includes the deletion of the related transition provisions to Part-CAMO and Part-CAO set forth in Article 4 *'Approvals for organisations involved in the continuing airworthiness'*.

- **As regards the list of Part-66 aircraft type ratings**

This RMT includes a proposal to reduce the global volume of AMC to Commission Regulation (EU) No 1321/2014 by moving the content of Appendix I to AMC to Annex III (Part-66) to EASA's website, where it will remain publicly available.

The purpose is to simplify the process for amending the aircraft type ratings list, so that the adoption of ED Decisions would no longer be required, thereby allowing more responsive updates based on new or revised type certificate holder data (e.g. type certificate data sheet model designation).

This also allows the dismissal of RMT.0541 *'Regular update of aircraft type ratings for Part-66 aircraft maintenance licences'*.

In addition, features may be added later to the EASA website to ease navigation through the aircraft type ratings for all stakeholders.

- **As regards aligning the rules with applicable amendments to the ICAO SARPs**

This alignment includes the implementation of Amendment 36 to ICAO Annex 6, Part I, which introduces extended diversion time operations (EDTO) to replace ETOPS, within Appendix 8



to AMC 20-6B *'Extended-range operation with two-engine aeroplanes — ETOPS certification and operation'*⁸, where continuing airworthiness considerations are set out.

Concurrently, the content of this Appendix is moved from AMC 20 to the relevant AMC to Annex II (Part-145) and Annex Vc (Part-CAMO) to Commission Regulation (EU) No 1321/2014.

- **As regards considering the outstanding items from RMT.0096 and RMT.0217**

For RMT.0096, the proposed amendments of NPA 2013-12⁹ were considered.

For RMT.0217, the proposed amendments of NPA 2014-27¹⁰ were considered.

Overall, most of those amendments have already been addressed through completed rulemaking actions (e.g. RMT.0251 which led to Commission Implementing Regulation (EU) 2021/1963 as regards safety management system requirements in Part-145).

Some of those amendments would not apply anymore owing to other changes made to Commission Regulation (EU) No 1321/2014 and the associated AMC and GM in the meantime.

As a result, none of the remaining proposed amendments from RMT.0096 and few of those from RMT.0217 (i.e. new proposed GM1 M.A.301 on roles for continuing airworthiness tasks and AMC M.A.301(a) on pre-flight inspections) were considered relevant and incorporated to into the proposed amendments of this NPA.

- **As regards considering the outcomes of the EU SRM process**

In the context of the new SRM process and Safety Issue SI-9001 *'Inadequate management of repetitive defects'*, it was decided to introduce specific GM for CAMOs and maintenance organisations for raising awareness on exchanging information, managing, and rectifying repetitive defects occurring on a single aircraft (refer to new proposed GM1 M.A.301(b)).

In addition, this guidance will support competent authorities in focusing their oversight on the management of repetitive defects by these organisations.

- **As regards EASA initiatives on the digitalisation of certain processes**

This RMT includes proposals to clarify the possibility for affected stakeholders to issue various types of certificates in digital format, including organisation certificates, certificates of release to service (CRS), and certificates of recognition (CoR).

In addition, amendments are proposed to delete the requirements to return certificates upon their surrender or revocation, and to clarify that applications may also be submitted through online platforms (e.g. a dedicated website) when decided by the competent authority.

All proposals have been developed in consideration of the *'Guidelines on the use of electronic documents, records, and signatures in the Continuing Airworthiness domain'*¹¹ and include,

⁸ [AMC-20 Amendment 23](#)

⁹ [NPA 2013-12 'Amendment to Decision 2003/19/RM \(AMC to Part-145\) to adapt it to the process of granting Part-145 approvals to maintenance organisations located outside the territories of the Member States'](#)

¹⁰ [NPA 2014-27 'Continuing Airworthiness Management Organisations' \(CAMOs\) and Part-145 organisations' responsibilities'](#)

¹¹ [Guidelines on the use of electronic documents, records, and signatures, Issue 1 \(FAQ n. 137907\)](#)

where relevant, references to Regulation (EU) No 910/2014 (eIDAS)¹² to ensure satisfactory data authentication and integrity.

Target applicability date

Because of the nature of the proposed amendments, which are expected to be non-controversial and beneficial to the affected stakeholders, EASA intends to propose to the European Commission a slightly delayed applicability date (i.e. up to six months) following the entry into force of the adopted regulatory material.

The final applicability date will be discussed and determined during the Comitology process at the European Commission.

Legal bases

The legal basis for amending Commission Regulation (EU) No 1321/2014 lies in Article 17 of the Basic Regulation regarding the adoption of implementing acts laying down detailed provisions concerning the rules and procedures or the privileges and responsibilities set out in points 1(b) to 1(g) inclusive.

The legal basis for the issuance and amendment of AMC and GM for the application of the implementing acts, such as Commission Regulation (EU) No 1321/2014, lies in Article 76(3) of the Basic Regulation.

2.4. What are the stakeholders' views

To complement the amendment topics collected over the years and ensure that stakeholders' views are given balanced consideration in the development of proposed amendments, EASA invited those stakeholders to share or further elaborate their proposals covering the full scope of Commission Regulation (EU) No 1321/2014.

Those contributions have been in the form of written inputs and were mainly received:

- from the competent authorities of the Member States, through the P&CA TeB, where dedicated actions were defined and tracked;
- from European industry stakeholders, through separate initiatives such as rulemaking proposals and queries relating to the implementation of the Regulation.

Most contributions received aimed to address implementation issues by proposing that certain provisions be either:

- more flexible and practical to implement, to tackle cases where affected stakeholders may be negatively affected by overly prescriptive or inadequate provisions; or
- more complete or precise, to tackle cases where a lack of clarity may also negatively affect a consistent implementation of the Regulation.

¹² Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC (OJ L 257 28.8.2014, p. 73) (<http://data.europa.eu/eli/reg/2014/910/2014-10-18>)



The contributing stakeholders welcomed the opportunity to share input based on their experience of implementing the Regulation and did not express any specific concerns about this approach.

All contributions were considered in the prioritisation and selection of topics (as mentioned in Section 2.1.1.) for which amendments are proposed in NPA 2025-12 (B) and NPA 2025-12 (C).

2.5. Other relevant information

The following should be considered:

- **As regards the volume of identified topics and issues**

In total, more than 500 topics covered by the Regulation and associated AMC and GM were collected by EASA and considered for inclusion in the proposed amendments.

To be able to meet the deadlines set in the EPAS for this regular update, EASA decided to focus on a narrower selection of 80 of those topics, assessed as being non-controversial, having higher importance, a positive impact (if addressed), and higher priority, thus best fulfilling the scope of this RMT.

Note: The 80 selected topics and issues are not all listed or mentioned in this document to keep it concise. The reader is invited to discover them directly with the proposed amendments included in NPA 2025-12 (B) and NPA 2025-12 (C), together with their associated rationale for amendment (refer to Sections 2.3 and 2.5).

- **As regards identified topics and issues not addressed by this regular update**

As regular updates to Commission Regulation (EU) No 1321/2014 are recurrent, EASA may reconsider those topics and issues that are not addressed by the regulatory material proposed with NPA 2025-12 (B) and NPA 2025-12 (C) during the next regular update cycle.

- **As regards aligning Commission Regulation (EU) No 1321/2014 and the associated AMC and GM with other EU regulations**

Point 21.A.307 and AMC1 21.A.303(c) of Annex I (Part 21) to Commission Regulation (EU) No 748/2012 will be amended under RMT.0031 *'Regular update of the Initial Airworthiness Regulation and associated AMC and GM'* to define the documentation accompanying parts for which an EASA Form 1 is not required.

These amendments are expected to impact points M.A.305(e)(3)(iii) and M.A.502 of Annex I (Part-M) to Commission Regulation (EU) No 1321/2014, which will therefore require alignment. Similarly, GM M.A.305(d)(2)(d) and AMC2 M.A.501(a)(4) will need to be updated accordingly.

However, these alignments can only be implemented once the final text of the corresponding Part 21 provisions has been adopted, which remains pending at the time of publication of this NPA.

The necessary amendments to the affected Part-M provisions will therefore be introduced with the Opinion and Decision referred to in Section 1.3.



3. Expected benefits and drawbacks of the proposed regulatory material

EASA assessed that an intervention was required and that new or amended regulations, AMC, and GM are necessary to effectively address the topics and issues described in Section 2.1, because the objectives described in Section 2.2 cannot be achieved effectively by non-regulatory action.

It is deemed necessary to address identified issues, inconsistencies, and inefficiencies associated with the content and implementation of Commission Regulation (EU) No 1321/2014 and to align its provisions with the relevant international standards (e.g. ICAO SARPs), recommendations, and industry practices (e.g. as regards the digitalisation of documents and signatures) on a regular basis.

EASA assessed the impacts of the proposed regulatory material to ensure that the regulatory material delivers its full benefits with minimum drawbacks.

The proposed regulatory material has been developed in view of the better regulation principles, and in particular the regulatory fitness principles. Specifically, the proposed regulatory material will:

- Alleviate the existing regulatory burden by clarifying and improving the proportionality of miscellaneous requirements, deleting outdated provisions, and simplifying the overall framework;
- limit the regulatory burden created by new and amended provisions to the minimum by focusing on clarification, alleviation, simplification, and consistency corrections made to the existing provisions.

3.1. How this proposal contributes to rule simplification

This proposal contributes to:

- the deletion of obsolete and duplicative requirements

The proposal to delete Subpart F and Subpart G of Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 is considered to significantly improve the readability and navigability of Commission Regulation (EU) No 1321/2014 and the associated AMC and GM.

- the removal of obstacles to digitalisation

The proposals to clarify the possibility to use online platforms and to rely on certificates issued in digital format are expected to bring flexibility to the affected stakeholders.

- easing the access to information

The proposal to move the list of aircraft type ratings from Appendix I to AMC to Annex III (Part-66) to the EASA website is expected to ease navigation by stakeholders and future amendments thereto.

- harmonisation the qualification criteria for the safety manager across technical areas

This NPA proposes amendments to AMC to Annex II (Part-145) and Annex Vc (Part-CAMO) to Commission Regulation (EU) No 1321/2014 to ensure that knowledge, background, and experience criteria for the safety manager are consistent across various aviation domains, allowing the same individual to fulfil the safety manager role in multiple domains, when appropriate.



In total, this RMT is expected to reduce the volume (i.e. number of pages) of the existing continuing airworthiness regulatory material by approximately 20%.



4. Proposed regulatory material

Please refer to:

- **NPA 2025-12 (B) — Proposed amendments to Commission Regulation (EU) No 1321/2014 and associated AMC and GM**
- **NPA 2025-12 (C) — Proposed amendments to AMC 20 for Airworthiness of Products, Parts, and Appliances**



5. Monitoring and evaluation

Considering the scope of this RMT as a regular update to Commission Regulation (EU) No 1321/2014 and the associated AMC and GM, no monitoring and evaluation provisions are deemed necessary.



6. Proposed actions to support implementation

Considering the scope of this RMT as a regular update to Commission Regulation (EU) No 1321/2014 and the associated AMC and GM, no specific actions to support implementation are deemed necessary.



7. References

All relevant and accessible references are included as footnotes in the other chapters and sections of this document.

In addition, the amendments proposed to implement ICAO EDTO provisions (refer to Section 2.3) were developed with due consideration of the following documents:

- ICAO, *Annex 6 – Operation of Aircraft – Part I – International commercial air transport aeroplanes (Amendment no. 48 dated 18/11/22)*, 12th edition, 2022.
- ICAO, *Extended Diversion Time Operations (EDTO) Manual (Doc 10085)*, 1st edition, 2017.
- ICAO, *Annex 8 – Airworthiness of Aircraft*, 13th edition, 2022.



Appendix 1 — Impact assessment(s)

Considering the scope of this RMT as a regular update to Commission Regulation (EU) No 1321/2014 and the associated AMC and GM, only amendments deemed as non-controversial are proposed in NPA 2025-12 (B) and NPA 2025-12 (C).

Therefore, it was assessed that an impact assessment would not be necessary for these proposed amendments.

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Appendix 2 — Quality of the NPA

To continuously improve the quality of its documents, EASA welcomes your feedback on the quality of this document with regard to the following aspects:

Please provide your feedback on the quality of this document as part of the other comments you have on this NPA. We invite you to also provide a brief justification, especially when you disagree or strongly disagree, so that we consider this for improvement. Your comments will be considered for internal quality assurance and management purposes only and will not be published (e.g. as part of the CRD).

1. The regulatory proposal is of technically good/high quality

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

2. The text is clear, readable and understandable

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

3. The regulatory proposal is well substantiated

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

4. The regulatory proposal is fit for purpose (achieving the objectives set)

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

5. The regulatory proposal is proportionate to the size of the issue

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

6. The regulatory proposal applies the ‘better regulation’ principles^[1]

Please choose one of the options

Fully agree / Agree / Neutral / Disagree / Strongly disagree

7. Any other comments on the quality of this document (please specify)

^[1] For information and guidance, see:

- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en
- https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en

