EASA Powerplant Installation Fire Certification Issues

R. Delétain
2D Nacelle (CS 25.867)

Nacelle / Cowling Fire Withstanding capability (CS 25.1193 / CS 25J1193)

Halon Replacement (All CS)
2D Nacelle (CS 25.867)
CS 25.867 Fire protection: other components

(a) Surfaces to the rear of the nacelles, within one nacelle diameter of the nacelle centre line, must be constructed of materials at least equivalent in resistance to fire as aluminum alloy in dimensions appropriate for the purpose for which they are used.

(b) Sub-paragraph (a) of this paragraph does not apply to tail surfaces to the rear of the nacelles that could not be readily affected by heat, flames, or sparks coming from a designated fire zone or engine compartment of any nacelle.
Rule require fire withstanding capability of the structures at the rear of the nacelle.

Typically:
- the wing including leading and trailing edges for wing mounted engine,
- fuselage for rear mounted engine,
- nacelle and pod.

Reference material is aluminum.

For equivalency to aluminum, iaw CS-Definitions, EASA interpretation of CS 25.867(a) is to have fire resistant surfaces, using ISO 2685
For wing mounted engine, CS 25.867(b) dispense tail surfaces from showing compliance with 25.867 (a), if they are not directly under threat from the engine.
25.867 set forth some basic heat withstanding capability for the nacelle and its surrounding structure, covering normal functioning and some recurrent issues, such as tailpipe fire.
The normal CS 25 fire containment system has been defeated implemented by CS 25.1181 to 25.1207, and the fire breaches the firewall and/or the cowls, possibly migrating to other areas of the aeroplane.
A fire might occur in areas outside of the designated fire zone, for instance in the engine pylon (i.e. fuel leak igniting on the engine nozzle).
EASA CRI to define scope, diameter, x-axis reference, surfaces (panels, seals,...), cross-reference to ISO,...

Will become a Generic CRI
EASA Rulemaking Tasks
Generic CRI
RM Task 25.0070 Generic CRI

- Proposal to amend both
  - rules [CS 25.1193(e) / 25J1193(e)] and
  - interpretative material (AMC 25.1193(e) common to Engine/APU)
- Basis from recurring CRI/IP and ARAC WG
- NPA 2011-09: Consultation period 31/05/2011 – 31/08/2011
New rule give a relaxation of the fireproof requirement

Before:
- Fireproof

Now:
- Fireproof (flight)
- Fireproof (ground + critical radial sector)
- Lower than fireproof (ground + not critical radial sector)
Credit of the relative air flow (flight)

Flight conditions: airspeed above minimum V1 until minimum touchdown speed

Critical area defined upon:
- Fuel tank explosion,
- Fire spreading
- F/CTL damages
- Fuselage penetration
- Injuries to crew, passengers or ground crew

Dependant of powerplant installation
- Symmetry may vary
- Similarity / in-service experience path
- Considerations for opening, latches, hinges, seals, etc.

<table>
<thead>
<tr>
<th>FLIGHT</th>
<th>GROUND</th>
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<tbody>
<tr>
<td>FIREPROOF</td>
<td>FIREPROOF</td>
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<tr>
<td>FIREPROOF</td>
<td>≤ FIRE RESISTANT</td>
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</table>
RM Task 25.0070 Generic CRI

- Comments reviewed and considered whenever felt necessary

- CRD ready for EASA Internal Consultation
EASA Rulemaking Tasks
Halon Replacement
The Mission of EASA is to be the Regional Safety Oversight Organisation (RSOO) of the European Union (EU). Its role is not limited to audits (i.e., standardisation inspections, similar to USOAP) of the actual behaviour of the competent aviation authorities established at national level by the Member States of the EU. It also includes:

- Directly issuing some certificates; and
- Rulemaking

In other words, most of the ICAO SARPs are no longer transposed in the EU at national level, but at once for 30 ICAO Contracting States (27 EU + Iceland, Norway, and Switzerland), through EASA. Legally binding rules, based on proposals by EASA, are adopted by the European Commission.

Article 6 of Basic Regulation 216/2008\(^2\) as amended by 1108/2009: Essential requirements for environmental protection

1. Products, parts and appliances shall comply with the environmental requirements in Amend. 9 of Vol. I and in Amend. 6 of Vol. II of **Annex 16 to the Chicago Convention** as applicable on 20 November 2008, except for the Appendices to Annex 16

2. Measures to amend requirements referred to in § 1 in order to bring them into line with subsequent amendments to the Chicago Convention and its Annexes which enter into force after the adoption of this Regulation and which become applicable in all Member States, shall, in so far as such adaptations do not broaden the scope of this Regulation, be adopted in accordance with the regulatory procedure with scrutiny referred to in Article 65(5)

\(^2\) Regulation (EC) 216/2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency
develops and implements climate change policies and strategies in order for the EU to meet its targets for 2020 and beyond, especially with regard to reducing its greenhouse gas emissions

- aims at protecting the ozone layer and at ensuring that the climate is present in all Community policies; and
- that adaptation measures will reduce the European Union's vulnerability to the impacts of climate change
- leads the respective Commission task forces on the international negotiations in the areas of climate change and ozone depleting substances (ODS) and coordinates bi-lateral and multi-lateral partnerships on climate change and energy with third countries

The “owner” of Regulation 744/2010

Establishes for each application:

- **cut-off dates** after which the use of halon for new equipment or products (i.e. related to **new applications for type certification**) would no longer be permitted

- **end dates** after which the use of halon would no longer be permitted: i.e. all halon fire extinguishers and fire protection systems should be **replaced, converted or decommissioned** by the end date (i.e. retrofit may be required)

This also implies that **halon can no longer be implemented on newly produced aircraft**, on the basis of existing TCs at the “end date” (**forward fit** on aircraft not yet delivered to operators)

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4. Commission Regulation (EU) 744/2010 on substances that deplete the ozone layer, with regard to the critical use of halons.
## Comparison with ICAO SARPs

<table>
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<tr>
<th>Purpose</th>
<th>Type of extinguisher</th>
<th>Halon</th>
<th>ICAO SARPs</th>
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<tr>
<td></td>
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<td>Dates</td>
<td>Dates</td>
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<tr>
<td></td>
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<td>Cut-off</td>
<td>End</td>
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<tr>
<td>Normally unoccupied cargo compartments</td>
<td>Fixed</td>
<td>1301</td>
<td>2018</td>
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<td></td>
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<td>1211</td>
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<td>2402</td>
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<tr>
<td>Cabins &amp; crew compartments</td>
<td>Portable (Handheld)</td>
<td>1211</td>
<td>2014</td>
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<td>2402</td>
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<tr>
<td>Engine nacelles and APU</td>
<td>Fixed</td>
<td>1301</td>
<td>2014</td>
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<td>1211</td>
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<tr>
<td>Lavatory waste receptacles</td>
<td>Fixed</td>
<td>1301</td>
<td>2011</td>
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5 Commission Regulation (EU) No 744/2010 does NOT mention a date for newly produced aircraft, according to an existing TC.

6 Proposed ICAO SARPs do not contain end dates for removal of halon from aircraft already in service.

7 No new application for TC possible, if halon is present in the design

8 After which the use of halons is no longer permitted; all halon fire extinguishers and fire protection systems should be replaced, converted or decommissioned

9 E.g. aircraft for which individual certificate of airworthiness is issued after the stated date, but for which model TC already exists

10 For aircraft whose application for TC will be submitted on or after 31st of December of that year.
Halon – Update of CS/AMC to comply with EU Regulations and ICAO Resolution

- **2011**: EASA initiated a rulemaking task to amend CS-23, CS-25 and CS-29 in order to be compliant with EU legislation and with the Amendment 103 to ICAO Annex 8.
- **2012**: CS-23\(^{11}\) and CS-25\(^{12}\) have already been amended and CS-29 is being amended accordingly.

**CS (Book 1)**: no reference to either halon or any other extinguishing agent

**AMC/GM (Book 2)**: explain the reason for halon being phased out referring to Regulation 744/2010


Halon- Update of Part 26 to comply with ICAO Standards

- EU legislation implies compliance with applicable amendments to ICAO Annex 6 (i.e. newly produced aircraft based on existing Type Certificates) **only** in **2020** (for handheld fire extinguishers) and **2025** (for lavatories)

- EASA has planned RMT.0560 to comply with the dates set on ICAO Amendments to Annex 6 (i.e. **2011** 🙁 for lavatories and **2016** for hand-held fire extinguishers)

- **Proposed option**: **Forward fit** for lavatory disposal receptacle and portable fire extinguishers in cabins and crew compartments
EASA RULEMAKING TASK  
RMT.0560

Halon- Update of Part 26 to comply with ICAO Standards

• Benefits:
  - halon alternatives sufficiently safe and suitable for portable and lavatories
  - environmental benefits, with minimum economic impact on aircraft manufacturers
  - comply with current ICAO standards
  - No amendment to EU 744/2010 needed

Notice of Proposed Amendment (NPA) available by mid 2013 (anyone can comment)
In order to comply with ICAO Resolution A37-9 ‘halon replacement’ adopted during ICAO 37th General Assembly, EASA has mandated SAE (Society of Automotive Engineers) to develop Minimum Performance Standards for **halon free** portable fire extinguishers to be used in aircrafts.

An ETSO (European Technical Standard Order) will be published:

(RMT.0206) .... NPA in 2013
Protection against the use of contaminated halon by aircraft owners/operators and in maintenance, production and air operator organisations

In order to align with ICAO Resolution A37-9 'halon replacement' adopted during ICAO 37th General Assembly, amendments to of Part-145 and Part-M shall be made. AMC/GM (Acceptable Means of Compliance/Guidance Material) will be developed for production and maintenance organizations to verify the quality of halon in their possession through testing and internal procedures.

Notice of Proposed Amendment (NPA) planned in Q3 of 2013.
## Conclusions

<table>
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<tr>
<th>RMT</th>
<th>STATUS</th>
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| 0273 | New applications for TC  
CS-23 & 25 amended  
CS-29 amended before end 2012 |
| 0560 | Newly produced aircraft  
NPA planned in 2013 |
| 0206 | ETSO for portable fire extinguishers  
NPA planned in 2013 |
| 0368 | Contaminated halon  
ToR being drafted  
NPA planned in 2013 |
| ??   | Engine nacelles, APU and cargo compartments  
No obligation of any agent in CSs  
Additional RMTs could be planned |
Thank You For Your Attention