

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0180

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Commenter 1: The Emirates Group – Sagar Manzoor Banbhan – 20/08/2025

Comment #1

We are writing to request clarification regarding EASA Airworthiness Directive No. 2025-0180, issued on 15 August 2025, specifically concerning contradictory language identified in **Section 4**.

Issue Summary:

Upon review of the directive's "Required Action(s) and Compliance Time(s): Additional Maintenance Requirements" section, we have identified what appears to be contradictory guidance in Section 4. The section simultaneously:

- References both aircraft groups/categories
- States "DO NOT ACCOMPLISH ANY MAINTENANCE ACTION"

Concern:

This contradictory language is creating confusion in the interpretation and implementation of the Airworthiness Directive requirements.

The simultaneous reference to maintenance groups followed by an instruction to perform no maintenance actions appears to be internally inconsistent.

Request: We respectfully request EASA's clarification on the following:

1. **Intended Scope:** Which specific aircraft groups or categories are subject to the requirements outlined in Section 4?
2. **Required Actions:** What are the actual maintenance actions (if any) that operators should perform or refrain from performing?
3. **Compliance Interpretation:** How should operators interpret the "DO NOT ACCOMPLISH ANY MAINTENANCE ACTION" instruction in relation to the referenced aircraft groups?

Impact: This ambiguity may lead to:

- Inconsistent compliance across operators



- Potential safety implications due to unclear requirements
- Administrative burden from varied interpretations

Requested Response: We would appreciate either:

- A formal clarification notice addressing the contradictory language
- Written guidance on proper interpretation of Section 4

We understand the critical importance of clear and unambiguous airworthiness directives for maintaining aviation safety standards.

We look forward to your prompt clarification to ensure proper compliance across our operations.

EASA response:

We disagree. Paragraph (4) of the EASA AD 2025-0180 does not allow to accomplish any maintenance action on an aeroplane in accordance with the instructions of the MP task A350-A-25-62-47-00001-720A-A dated earlier than 04 July 2025, since those instructions have been identified as incorrect. The statement “do not accomplish any maintenance action” does not refer to any other maintenance action, and e.g. accomplishment of any maintenance action in accordance to any version of that same MP task dated after 04 July 2025 is well allowed.

No changes have been made to the AD in response to this comment.

