

## COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0222

[Published on 13 October 2025 and officially closed for comments on 10 November 2025]

**Commenter 1: JUNEYAO AIR – Jiwen Xu – 15/10/2025**

### Comment #1

In AD 2025-0222, Acceptable Method(s) of Compliance section clarifies both paragraphs (2) and (3) are acceptable methods to comply with the requirements of paragraph (1)

We would like to know if we should meet both (2) and (3) to comply with requirements of paragraph (1) or either (2) or (3)?

### EASA response:

**Comment noted. Paragraphs (2) and (3) of the AD are acceptable method to comply with the requirements of paragraph (1) of the AD; as such, there is no obligation to use any of those methods.**

**In other words, the “core” requirement of the AD is defined in paragraph (1). To comply with paragraph (1), an operator may refer to paragraph (2) or paragraph (3), but also other methods can be used, provided that the National Competent Authority (responsible for AD enforcement) is satisfied.**

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

**Commenter 2: Korean Air – Chulhee Shim – 20/10/2025**

### Comment #2

2A) While applying the AD required actions, two questions have arisen.

First, do we need to perform **both (2) and (3)** paragraphs under Acceptable method(s) of compliance, or is it good to perform **just one** of the two methods under Acceptable method(s) of compliance?



**Acceptable Method(s) of Compliance:**

- (2) Amending the operations manual of an aircraft in accordance with the content of the SB is an acceptable method to comply with the requirements of paragraph (1) of this AD for that aircraft.
- (3) Disseminating the content of the updated instructions to flight and cabin crew members of an aircraft, and ensuring that they will operate in accordance with the updated instructions, is an acceptable method to comply with the requirements of paragraph (1) of this AD for that aircraft.

2B) Second, which manual exactly does “operations manual” specify in (2) paragraph under the Acceptable method(s) of compliance? FCOM, POM, CCOM, etc.

**EASA response:****Comments noted.**

**2A) See EASA answer to comment #1.**

**2B) “Operations manual” must be read as the Operations Manual as referenced in the Air Ops regulations (Regulation EU 965/2012). Practically speaking, it is each (one or more, depending on operator’s organisation) manual including the procedures and training for those members of the flight and cabin crew which may have to use the PBE.**

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

**Commenter 3: HI FLY – Marta Rodrigues – 22/10/2025**

**Comment #3**

Could you please confirm whether the **Parts Installation Provisions paragraph** is missing in the referenced Appliance AD?

The installation of an affected part should be acceptable for aircraft that will, in the future, embody a modification that installs such a part, **provided that all AD requirements are complied with**. Do you agree?

**EASA response:**

**Comment partially agreed.**



*EASA agree that if, in the future, an affected PBE will be installed on an a/c, the AD will have to be complied with.*

*EASA does not agree that a “part installation” provision (similar to that used in several others AD) is required for this AD. The AD requires implementing certain procedures; such action is required for those aircraft having that PBE in their configuration (even if that PBE could be not actually installed on the aircraft).*

*Any future installation (i.e., modification of an aircraft to allow carrying that part on board) will have to take the AD into account.*

*At present, no AD revision is expected; this comment will be taken into consideration should the AD be revised in the future.*

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

#### **Commenter 4: China Express Airlines Co. ,Ltd. – Wang Zequan – 23/10/2025**

##### **Comment #4**

HXA (China Express Airlines) would like to know when the AD 2025-0222 was uploaded to [EASA Safety Publications Tool](#)? The time was 2025-10-13 or other?

##### **EASA response:**

*Comment noted.*

*EASA AD 2025-0222 was uploaded in the EASA SP tool on 13 October 2025, around 18:00 German Time.*

*A notification was sent to registered users, having Appliances/ATA 35 in their filters, on 14 October 2025, around 00:30 German time.*

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

#### **Commenter 5: VallJet – Rahma Boughrara – 29/10/2025**

##### **Comment #5**

Could you please confirm whether Airworthiness Directive 2025-0222 supersedes or replaces Safety Information Bulletin No. 2025-04?

##### **EASA response:**



***Comment not agreed.***

***The AD does not supersede nor replace the SIB.***

***The SIB provides recommendation to several entities (NCAs, a/c operators, air crew, PBE manufacturers) and is not related to a specific PBE manufacturer or PBE P/N.***

***The AD requires (mandatory action) accomplishment of certain actions related to a specific PBE, as identified in the applicability of that document.***

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

#### **Commenter 6: Turkish Airlines – Emre Kabil – 05/11/2025**

##### **Comment #6**

According to EASA 2025-0222, THY will revise operational manuals to comply the AD's requirements.

For clarification, THY requested AIRBUS to provide information if Airbus is planning to revise any document related to this AD.

Airbus informed us, they will revise the FCOM and CCOM documents according to the AD.

Airbus published the FOT-999.0047-25-1 and FOT includes FCOM and CCOM document revisions that refers to EASA 2025-0222 and EASA SIB 2025-04.

Could you please confirm that revising the FCOM and CCOM documents according to FOT-999.0047-25-1 meets the requirements of the AD ?

##### **EASA response:**

***Comment not agreed.***

***EASA does not consider that revising the FCOM and CCOM documents according to FOT-999.0047-25-1 meets the requirements of the AD.***

***Those FCOM and CCOM are actually providing generic information, which are applicable for all PBEs.***

***The AD requires implementing specific instructions, as defined in the Safran Aerosystems SBs.***

***Similar information is provided in Airbus FOT 999.0047/25 Rev 01***

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

#### **Commenter 7: Jetstar Airways – Jeffrey Concordia – 11/11/2025**



**Comment #7**

I am Jeffrey Concordia, A320 Cabin Technical Specialist from Jetstar Airways (JST). I am formally writing to seek clarification regarding the demonstration of compliance against the requirements of EASA AD 2025-0222 which requires the implementation of updated PBE Operational instructions for Aerospace & Defense Oxygen Systems (part of SAFRAN Aerosystems & formerly Air Liquide) Protective Breathing Equipment (PBE) P/Ns 15-40F-11 and P/N 15-40F-80. PBE P/N 15-40F-80 is known to be installed on our A321-251NX and A320-251N aircraft. The updated PBE operational instructions were provided in Safran Aerosystems Service Bulletin (SB) 1540F-35-001 – Section 3.C.

JST would just like to seek clarification if it is mandatory for the updated PBE Operational Instructions (to be disseminated to the Flight Crew and Cabin Crew) to be an **exact transcription of the procedures as identified in Safran Aerosystems SB 1540F-35-001 – Section 3.C** to demonstrate compliance to the AD requirement/s.

**EASA response:****Comment noted.**

***The AD requires implementing the instructions. Any method to ensure that flight and cabin crew will follow those instructions is acceptable for compliance, provided the National Competent Authority (responsible for AD enforcement) is satisfied.***

***An exact transcription of the procedures as identified in the Safran Aerosystems SB 1540F-35-001 – Section 3.C is not required for compliance with the AD.***

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

**Commenter 8: Airbus India Private Limited – Rameez Ummer P – 13/11/2025****Comment #8**

The AD mandates the dissemination of updated operational instructions to flight and cabin crew, based on the corrected procedures stipulated in **Safran VSB 1540F-35-001**, specifically addressing proper PBE donning and the associated risks of improper handling.



**Compliance Action Taken**

As the operator, we confirm that we have completed the action required by the AD by implementing the content through the following means:

1. **Airbus Flight Operations Transmission (FOT reference 999.0047/25 Revision 00, dated 31 July 2025):** This FOT informed us of the revision to the Cabin/Flight Crew Operating Manuals (**CCOM/FCOM**) to incorporate the necessary PBE operational updates.
2. **Internal Dissemination:** We have subsequently updated and disseminated these updated instructions, referencing the FOT content, via our internal Flight Operations Circulars to all flight and cabin crew members.

**Required Clarification for AD Closure**

We understand that the content within the referenced Airbus FOT is equivalent to and addresses the corrective actions detailed in the Safran VSB - 1540F-35-001 and required by EASA AD 2025-0222.

However, the specific reference **FOT 999.0047/25** is not explicitly listed in the AD 2025-0222 or the underlying VSB.

**Our critical query is:** We request urgent confirmation on whether compliance with EASA AD 2025-0222 can be formally recorded and closed based on the revision and dissemination completed via **Airbus FOT 999.0047/25** and the subsequent update of our **FCOM/CCOM**, given that this action successfully implements the corrected operational procedures mandated by the EASA AD 2025-0222.

***EASA response:***

***Comment not agreed.***

***The AD 2025-0222 requires implementing procedures which are specific to the PBE P/N affected by the AD, as specified in the Service Bulletin referenced in the AD.***

***EASA does not consider that revising the operator FCOM and CCOM documents according to FOT-999.0047-25 original issue meets the requirements of the AD.***

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

