

COMMENT RESPONSE DOCUMENT

EASA AD No.: 2025-0295

[Published on 22 December 2025 and officially closed for comments on 19 January 2026]

Commenter 1: Amac Aerospace – Prosdocimo Nicolai – 23/12/2025

Comment # 1

With reference to the required action on EASA AD **2025-0295**, could you please clarify if our understanding is correct that the requirement to ‘not use a pallet net on any aircraft’ applies only to the ‘affected’ pallet nets?

//quote//

Starting from 30 days after the effective date of this AD, **do not use a pallet net on any aircraft.**

//unquote//

EASA response:

Comment noted: EASA confirm that the actions required by AD 2025-0295 are only applicable to those nets which are affected by the AD.

Actually, the AD is not issued at aircraft level, but to those specific nets.

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

Commenter 2: Airmaster Airlines – Kamel Salem – 23/12/2025

Comment # 2

Regarding AD. 2025-0295, it is understood that starting from 30 days after the effective date of this AD, it is not allowed to use a pallet net on any aircraft.



But it is not clear if this applies to all kinds of pallet nets (including ACM 2M4N-type) or AD applies only to ACM 2M4N-type.
Please review & clarify the required action statement.

EASA response:

See EASA answer to Comment 1

Commenter 3: Cathay Pacific Airways Limited – Gawin Lau – 24/12/2025

Comment # 3

Current CPA cargo pallet net control is to follow IATA ULDR regulations, and we accept all the pallet nets that are certified under TSO C90.
After checking EASA website, I found that affected pallet net P/N is also listed under the TSO C90 certification.

AIRCRAFT CABIN MODIFICATION GmbH - WORINGERSTRASSE 11 87700 MEMMINGEN GERMANY					
Approval Number	Date of last issue	Description	Partnumber(s)	ETSO Standard(s)	DDP Reference
EASA.210.10078151	1/18/2022	ACM Pallet Net 2M4N	5010-2M4N-()-()()	C90D A1	DDP-ETSO-02

CPA has the following inquiries to EASA and ACM:

- Will the affected pallet 5010-2M4N-()-()() be removed from TSO C90 certification? As it will effectively prevent to install any uncertified pallet net on wing in order to comply with the AD.
- Can ACM share the SB ETSO-02 SEB 06 00 to CPA for review?.

EASA response:

3A) Comment noted. EASA cannot cancel that certification. No changes have been made to the Final AD in response to this comment.

3B) Comment noted: While EASA acknowledges that the request is addressed to ACM, EASA reminds that EASA cannot provide the SBs referenced in the AD – please refer to this FAQ: [Can EASA provide the service information referenced in an AD? | EASA](#)

To be noted that EASA AD 2025-0295 prohibits using the pallet nets affected by the AD, with no reference to instructions of the SB. In other words, to comply with the AD, availability of the SB is not needed.

No changes have been made to the AD in response to these comments.



Commenter 4: EgyptAir – Shaimaa Zedan – 24/12/2025**Comment # 4**

Egypt Air would like to enquire about AD 2025-0295 definition of Pallet net as it states in the required actions section “Starting from 30 days after the effective date of this AD, do not use a pallet net on any aircraft.”

From our understanding it would mean the affected Pallet net of this AD but the phrase statement is generalized as it could also mean not using any pallet net on any aircraft.

Kindly provide us with a clarification or a definition of the “Pallet Net” that states that it is meant for the affected Pallet net P/N of this AD

EASA response:

See EASA answer to Comment 1

Commenter 5: Tibet Airlines – Jimeng Sun – 26/12/2025**Comment # 4**

Per AD 2025-0295, TBA can not get the reference document The SB: ACM Service Bulletin (SB) ETSO-02 SEB 06 00

Could EASA supply TBA The SB: ACM Service Bulletin (SB) ETSO-02 SEB 06 00

EASA response:

See EASA answer to Comment 3B

Commenter 6: ITA Airways – Pasquale La Spina – 29/12/2025**Comment # 4**

A. During Aircraft Operational activity Pallet Net are usually managed by Cargo Handling Personnel not EASA Part 145 approved. Check for Pallet net P/Ns used is not performed by a Part 145 organization before each flight;



B. To satisfy subject AD EASA Requirements kindly clarify if specific notification to Cargo Handling personnel involved in the Cargo activity will fulfill AD required actions.

EASA response:

Comment noted. EASA recommends operators to seek and follow advice from their national competent authority (NCA), that is responsible for AD enforcement. No changes have been made to the AD in response to this comment.

Commenter 7: HNAir – 刘捷 Harlow – 30/12/2025

Comment # 7

We couldn't get in touch with the ACM engineer.

Could you provide the ACM Service Bulletin (SB) ETSO-02 SEB 06 00?

EASA response:

See EASA answer to Comment 3B

Commenter 8: NWAirlines – Lei Zhang – 30/12/2025

Comment # 8

We have reviewed EASA AD 2025-0295 issued on 22 December 2025.

This AD, targeting ACM (Aircraft Cabin Modification GmbH) unit load device nets (P/N: 5010-2M4N-()-()()), references "ACM Service Bulletin ETSO-02 SEB 06 00 (original issue, 28 Nov 2024)".

To ensure compliant implementation of the AD and maintain fleet airworthiness, we urgently need a copy of this SB.

We kindly request your assistance in providing this document. Please inform us of any required procedures, forms, or fees. If available on official EASA platforms, a retrieval link would be greatly appreciated.

EASA response:

See EASA answer to Comment 3B



Commenter 9: Tech Mahindra, Subcontractor for Retrofit Solutions Customer Support – SIMAO (AIRBUS S.A.S) – Arvind Raj R – 31/12/2025

Comment # 9

We are requesting a copy of Service Bulletin ETSO#02 SEB 06 00, referenced in EASA Airworthiness Directive (AD) 2025#0295, issued on December 22, 2025.

Please confirm if Airbus has this Service Bulletin available and if it can be provided to us. Obtaining the latest approved revision is essential to ensure the effectiveness of compliance actions on our aircraft.

Could you kindly advise and, if possible, share:

- The latest approved revision of SB ETSO#02 SEB 06 00
- Any additional compliance instructions associated with this AD

Thank you for your support and cooperation.

EASA response:

See EASA answer to Comment 3B

In addition, EASA confirms there are no additional compliance instructions associated with this AD.

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

Commenter 10: AirChina – Tang Xiao Ping – 24/12/2025

Comment # 10

We just received the attached EAD 2025-0295, which is linked to ACM SB :ETSO-02 SEB 06 00 , Could you send it to me via email?

EASA response:

See EASA answer to Comment 3B



Commenter 11: Ameco – Liu Jie – 05/01/2026**Comment # 11**

The affected part is pallet net with P/N 5010-2M4N-()-()(), all serial numbers manufactured on or before 20 May 2025. Take A350-941 aeroplane for example, there are two types of nets used on aeroplane, one type is used with pallet, and another type is installed in bulk cargo compartment.

We want to know which type of nets is applicable to EASA AD 2025-0295.

EASA response:

EASA AD 2025-0295 prohibits using any ACM pallet net, having P/N 5010-2M4N-()-()(), for any installation.

Pallet nets not having P/N 5010-2M4N-()-()() are not affected by the AD.

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

Commenter 12: Plus Ultra – Juan Moreno Perez – 05/01/2026**Comment # 12**

I am writing regarding the AD 2025-0295, the applicability is

Applicability:

Pallet nets part number 5010-2M4N-()-()(), all serial numbers manufactured on or before 20 May 2025.

the required action is:

- (1) Starting from 30 days after the effective date of this AD, do not use a pallet net on any aircraft.

when the required action is "do not use a pallet net on any aircraft", we understand it refers only to those defined in the applicability.

Could EASA confirm whether this paragraphs refers only to the nets defined in the applicability or to any pallet net?

EASA response:

See EASA answer to Comment 1



Commenter 13: DHL – Christian Koeth – 05/01/2026**Comment # 13**

DHL is a little confused by the requirement of EASA AD 2025-0295, issued on 22. December 2025.

DHL understands that the safety concern is related to pallet nets manufactured by Aircraft Cabin Modification GmbH (ACM) and that the effected nets have part number 5010-2M4N-()-()-(), all serial numbers manufactured on or before 20 May 2025.

DHL understands that other pallet nets from other manufacturers and nets not having part number 5010-2M4N-()-()-() are not concerned.

However the AD requires in the Required Action(s) and Compliance Time(s) section:

“(1) Starting from 30 days after the effective date of this AD, do not use a pallet net on any aircraft.”

The way how this is written leads to the interpretation that pallet nets are not allowed on any aircraft regardless of the manufacturer or part number.

DHL doesn’t believe that this is the intension of the AD.

Can this please be clarified?

EASA response:

See EASA answer to Comment 1

Commenter 14: Silk Way West Airlines – Huseyn Bakhshiyev – 06/01/2026**Comment # 14**

Kindly assist in obtaining the ETSO-02 SEB 06 00 in accordance with EASA AD No. 2025-0295.

EASA response:

See EASA answer to Comment 3B



Commenter 15: Airzeta – Jinhoo Lee – 08/01/2026**Comment # 15**

In order to review EASA Airworthiness Directive 2025-0295, we require your ACM Service Bulletin (SB) ETSO-02 SEB 06 00. We kindly request that you provide the above-mentioned Service Bulletin at your earliest convenience.

EASA response:

See EASA answer to Comment 3B

Commenter 16: Iceland Air – Björn Hörður – 08/01/2026**Comment # 16**

- A. The applicability in SB ETSO-02 SEB 06 00 is more detailed down to specific P/Ns *, are they the only applicable P/Ns or are there more like are listed in the Applicability in the AD, Pallet nets P/Ns 5010-2M4N-()-()(), all serial numbers. Do we go by the applicability in the SB ETSO-02 SEB 06 00 * or do we go by the AD ?
- B. When referencing the net in the AD it is talked about: “remove those pallet nets” and “prohibits using the pallet nets”. But when it comes to the paragraph (1 sound like no pallet net can be used on any aircraft. Do we go by the applicability in the AD or are all pallet nets applicable ?

* P/N 5010-2M4N-A-118 manufactured in 04/2023 and P/N 5010-2M4N-B-118 manufactured in 10/2023.

EASA response:

16A) The applicability of the SB is all part number 5010-2M4N-()-()(), all s/n. Additional information is provided in the description, not superseding the applicability. As a general note, in case of inconsistencies between an AD and the referenced SB, the AD prevails.

16B) See EASA answer to Comment 1

No changes have been made to the AD in response to these comments.



Commenter 17: Etihad Airways – Pulsara Gunawardhana – 12/01/2026

Comment # 17

A. Basis for AD Issuance:

Could EASA clarify why this requirement was raised as an Airworthiness Directive rather than through an operational bulletin?

Reason being, pallet nets are not part of the aircraft configuration and are managed at the cargo operations level. This makes them outside the scope of conventional maintenance or engineering controls.

B. Cargo Operations Guidance:

Are there any additional documents such as operational circulars or cargo-specific guidelines issued or planned to help operators and cargo handlers enforce this restriction at the loading stage? Without such guidance, compliance may be inconsistent across the supply chain.

EASA response:

17A) Comment not agreed. The pallet nets are considered as “non-installed equipment” in accordance with Regulation (EU) 2018/1139, Article (3), point (29). According to that same regulation, article 140, (2)(c), the word “appliances” shall be understood as a reference to point (29) of Article 3 of this Regulation.

Regulation (EU) 748/2012, Annex I, article 21.A.3B, requires EASA to issue an Airworthiness Directive when an unsafe condition has been determined by the Agency to exist in an aircraft as a result of a deficiency in the aircraft, or an engine, propeller, part or appliance installed on this aircraft.

Please note that Notice of Proposed Amendment (NPA) 2025-02 has been published, putting forward amendments to Regulation (EU) 748/2012, which is available at [this link](#).

17B) EASA has not published additional documents. See also EASA answer to Comment 6

No changes have been made to the AD in response to these comments.

Commenter 18: Amsafe Bridport – Daniel Wilde – 14/01/2026

Comment # 18

Can we ask what revision ETSO standard the net was originally certified against?



EASA response:

Comment noted. The pallet net 5010-2M4N-()-()() was certified against the ETSO airworthiness standard ETSO-C90d A1

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

Commenter 19: Anonymous – 23/01/2026
Comment # 19

Can In the AD the following SB is referenced: ACM SB ETSO-02 SEB 06 00

The SB doc No. is ETSO-02 SEB 06 01

The SB as obviously revised.

Is it clear in the AD that the last two digits are the Revision?

Is it still the correct link?

In my opinion it is not clear.

EASA response:

Comment Noted. Since “The use of later approved revisions of the (SB) is acceptable for compliance with the requirements of this AD”, it is EASA opinion that, even if misunderstood, there would be no impact on safety.

In addition, see EASA answer to Comment 3B

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

