

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-045

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Commenter 1: Polizei NRW – Stefan Ochsenfarth – 13/03/2025

Comment # 1

From my point of view it is not clear why it is necessary to issue such an AD or PAD. Normally I have already required to comply to the EMM/ALS. To have a clear view, can you explain the reason to me?

EASA response:

Comment noted.

Commission Regulation (EU) 1321/2014 (Part-M) requires operators to have an approved AMP, but it does not specify exactly when, after ALS revision, the AMP must incorporate that revision. Considering that a competent authority may take some time to approve the AMP, the ALS AD sets a compliance time of 12 months to complete the update.

One of the reasons why EASA issues ALS ADs is to ensure that maintenance actions and life limitations are accomplished when they are due, even if the AMP of an aircraft is not yet updated to include these tasks and limitations.

The AD is a legally binding document, and non-compliance with an EASA AD would constitute non-compliance with the approved type design.

For more information, please refer to the specific [FAQ on EASA ALS AD](#), which explain why EASA issues AD mandating ALS.

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

