

COMMENT RESPONSE DOCUMENT

EASA PAD No. 25-090

[Published on 23 June 2025 and officially closed for comments on 07 July 2025]

Commenter 1: Gliding Australia – Anthony Smith – 24/06/2025

Comment #1

Gliding in Australia operates a large number of PA-25 Pawnees as towplanes. The Civil Aviation Safety Authority (CASA) have mandated Aviacion Civil Argentina AD 2024-05-01 for Australian aircraft. This AD has severely impacted the operations of many of our clubs.

I am interested in further information on how EASA have justified the extension of re-inspection intervals from 100 hrs to 1,000 hrs (as per Table 1 on page 4) for aircraft not having spray or dust dispensing equipment installed and limited to 1,000 kg MTOW.

Gliding Australia would like to apply to CASA for a similar extension of re-inspection intervals.

EASA response:

Comment noted.

EASA can not provide further information to operators about the justifications and analyses used for the AD content, but CASA can contact EASA if needed. No change was made to the final AD in response to this comment.

Commenter 2: Gliding Australia – Anthony Smith – 03/07/2025

Comment #2

Aviacion Civil Argentina (ANAC) issued Airworthiness Directive AD RA No 2024-05-01, R1, with an effective date of 18 Dec, 2025. Revision 1 of the AD includes instructions for Eddy Current Inspection (ECI) at dedicated locations along the wing front spar.

In Australia we found that the AD instructions as written could not be carried out on Piper Aircraft built Pawnees because they have a minor configuration difference to the Laviasa built Pawnees in the region of the wing strut attachment point.



Laviassa built Pawnees have the reinforcing strap fitted to the forward face of the spar web and all leading edge skins are attached to the rear flanges of the front spar. Laviassa built aircraft are apparently Pawnee D wings but with the fuel tank in the fuselage as per the earlier Pawnee A, B and C models.

Piper built Pawnee A, B, and C models have the reinforcing strap fitted to the aft face of the spar web and the leading edge skins outboard of the strut attachment terminate on the leading edge ribs and are not attached to the spar flange. The position of the reinforcing strap on the aft face prevents the published ECI as published in the AD from being carried out. The lack of screw holes for the leading edge skins means that the ECI is not required.

Piper Pawnee D model aircraft have the reinforcing strap fitted to the aft face of the spar web. However, the leading edge skins outboard of the strut are attached to the spar flanges.

Gliding Australia members developed an alternate NDT inspection which was submitted to CASA. CASA have approved this alternate NDT inspection.

I have attached the following:

- The application for AMOC sent to CASA
- The signed approval instrument from CASA
- The signed EO for the alternate NDT procedure

EASA response:

Comment partially agreed.

This difficulty in performing the inspection has not been reported to EASA previously. It was noted that the reinforcing strap position is making the inspection more difficult in that area when accessing from the Access cover No. 2.

The paragraphs (3), (7) and (8) of the AD are updated accordingly, to allow also access through other Access covers, not mentioned in ANAC AD 2024-05-01 R1.

The fact that the area where the wing leading edge skin is not attached to the front spar with the screws can be skipped because of the lack of holes, ref. point 6.3 (1)(a) of EO document provided, is not agreed.

The original ANAC AD Annex 1, par. 7 point E, is requesting to inspect spar flange areas not only around the holes, but also around gouges, scratches, dents and corrosion pits, if any.

No change was made to the final AD in response to this part of the comment.

Commenter 3: Fliegergruppe Grabenstetten-Teck-Lenninger-Tal e.V. – Patrick Kutschat – 26/06/2025



Comment #3

Here are some questions and feedback regarding the PAD 25-090. We are the owners of a **Piper built** PA25 and operate it from EDSG in Germany. Our usage is pure glider towing and no spray or other agriculture equipment is installed.

- The PAD organizes the planes in three different groups. Unfortunately the group definition is a bit misleading. A plane with spars older than 40 years and with more than 500 FH could be in Group 1 or 2. What is the purpose of those groups? Group 1 is more relaxed on the timing of the initial inspection, Group 2 helps to reduce effort in having the inspection interval @ 4 instead of 1 year.
- Why is the extended inspection interval only applicable for Group 2 spars?
- The suggested NDT procedure does not match for Piper built Pawnees. The Australian Gliding Federation has already contacted Laviassa and proposed an AMOC. It would be great to implement the latest revision of the Australian AMOC in the EASA AD. They already gained a lot of experience with their Pawnees. Anthony Smith is the leading head behind their efforts, he will send (or has already sent) feedback on the PAD, as well. The CASA AMOC from February is attached but I expect there will already be a more evolved version available.
- The FAA has not issued an AD although the US market is still one of the biggest for the Pawnees. I am wondering how they deal with the AD from Argentina? I would expect they are either also working on an AD with a suitable inspection program or they are relaxed due to enough field experience and regular inspections based on well known procedures during the annual review of the planes.

We also established contact to Mr. Werner Scholz, speaker of the European Sailplane Manufacturers to discuss this issue, as this is relevant for all Pawnees used in Europe for towing gliders. He signalled back that he could also be available for further discussion of this topic between stakeholders and EASA.

Therefore a webmeeting, connecting several affected owners/users in Europe, could help to align on all raised questions and comments before issuing the final version of the AD.

EASA response:**Comment noted.****1. Groups were already defined in the original ANAC AD with different sections applicable to Spars with different age.**

The group of spars defined in the PAD, shall not be confused with “group of aeroplanes”, which means that a single aeroplane may have, for instance, a left spar belonging to a group that is different to the right spar. This means that the relevant inspections at aircraft level shall be programmed as needed, also considering the possibility of having different applicability linked to the specific group.

2. The Group 2 spars, differently from Group 1, are subjected to repetitive NDT inspections according to the original ANAC AD, this inspection interval has been extended considering the information available.**3. Please refer to the response to comment #2.**

4. Noted. EASA is not in position to comment the FAA approach. EASA has decided to issue this AD, which provides benefits to European operators. If after the review of the Final AD, further technical discussion is required, please contact EASA through [airworthinessdirectives\[at\]easa.europa.eu](mailto:airworthinessdirectives[at]easa.europa.eu).

No change was made to the final AD in response to this comment.

Commenter 4: Centrum Kształcenia Lotniczego Politechniki Poznańskiej – Paweł Antkowiak – 01/07/2025

Comment #4

With reference to the issued Proposed Airworthiness Directive No. 25-090, I would like to briefly confirm the validity of the proposal and express our support.

We, as Aeroklub Poznański, have been operating a Piper PA-25-235 aircraft since 2018. The aircraft is used for glider towing operations and does not perform aerial operations such as spraying.

In 2025, we complied with the requirements of Airworthiness Directive No. 2024-05-01 Revision 1, as well as Service Bulletins 25-57-09 and 25-57-11.

The condition of the wing spars was found to be satisfactory, which was confirmed by a Non-Destructive Testing (NDT) inspection performed by an approved organization in accordance with PART-145 regulations.

As a CAO organization with the approval number PL.CAO.0033, we recommend an NDT inspection interval for the wing spars of 1,000 flight hours or 4 years, whichever occurs first.

EASA response:

Comment noted.

Commenter 5: Aeroklub Zagłębia Miedziowego – Dariusz Deptuła – 04/07/2025

Comment #5

I would like to inform you that I have read the content of the proposed AD No.: 25-090 and consider it justified considering the manner of operation of PA-25 Pawnee aircraft, mostly used as glider tows.



Since June 2023, the Aeroclub Zaglebia Miedziowegohas been using the PA-25-235 aircraft, with the serial number 25-3665 exclusively for glider towing operations. An analysis of the aircraft documentation shows that our last spraying flights were performed in 1984. Then, since the early 2000s, the aircraft has been performing glider tows and ferrying operations exclusively.

In 2025, we met the requirements of AD No.: 2024-05-01 R1 and SB 25-57-09 and 25-57-11. The main wing spars were checked by an approved PART-145 organization during non-destructive testing (NDT EC). The condition of the spars was considered satisfactory.

As a regional aeroclub using the services of approved CAO and PART-145 organizations, having in constant operation a PA-25-235 aircraft, the technical condition of which spars were checked by an experienced PART-145 organization, we recommend a period between NDT inspections of the wing spars of 1000 FH or 4 years, whichever comes first.

EASA response:

Comment noted.

Commenter 6: Kari Lappalainen – 06/07/2025

Comment #6

Aeroplanes not having spray or dust dispensing equipment installed: 1 000 FH or 4 years.

Comment from PA 25 glider tow plane operators:

1. In commercial gliding centres accumulated flight hours / year could be higher and in small clubs lower but typically PA25 in use of glider towing, accumulates 50-150h / calendar year. This means that during the period of 4 calendar years they do not fly more than 500-600h maximum, in small clubs much less. Requirement of performing Eddy current inspection after every 4 years sounds unreasonable. Hard to believe that the cracks from screw holes would be developing while the aircraft is sittng in the hangar.
 2. Due to wing configuration differences between the wings built by LAVIASA (Argentina) and wings built by Piper Aircraft Corporation (USA), some deviation from the instructions given in the ANAC AD No. 2024-05-01 R1, are required to ensure the spar is adequately crack inspected REF. Australian EO-DAC-PA25-57-00-108, 6.2 EDDY CURRENT INSPECTION AT FRONT SPAR, THROUGH ACCESS COVERS #1 & #2, alternate method.
 - 6.3 EDDY CURRENT INSPECTION AT FRONT SPAR, THROUGH ACCESS COVERS #6, no need for Eddy current inspection if there is no screw holes.
- Proposed EASA AD should contain the alternate method for inspection through access covers #1 and #2, mentioned above.
- Proposed EASA AD should cancel the request of Eddy Current inspection through the inspection hole #6, if there is no screw holes ins the spar.

EASA response:



Comment noted.

1.The EASA AD kept the same requirement structure of the original AD, including calendar inspections, considering that Argentina is the state of design.

The calendar requirement for the crack inspection is recognised as further precautionary measure, also considering the limited amount of data available. Currently, EASA does not hold supporting evidence for the proposed alleviation.

2.Acknowledged, please refer to EASA response to comment #2.

Commenter 7: Swedish Soaring Federation – Henrik Svensson – 08/07/2025

Comment #7

We appreciate that EASA is finding a more proportional way of dealing with this, especially with aeroplanes that are involved in aerotowing of gliders. The 1000 FH between inspections make sense and is acceptable, however, the rationale for Eddy-current inspections every fourth year is hard to understand. Fatigue cracks do not propagate when the aircraft is sitting in a hangar.

EASA response:

Comment noted.

See answer provided to comment 6 point 1.

