

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-002

[Published on 08 January 2026 and officially closed for comments on 05 February 2026]

Commenter 1: Lufthansa Technik AG – Alexander Hübinger – 15/01/2026

Comment # 1

We acknowledge the replacement requirement within the 36-month compliance time and the definition of a “serviceable slide” as set out in PAD 26-002 and the referenced Safran Aerosystems VSB A320 004 25 130.

From an operator/MRO perspective, we would appreciate clarification regarding the “Part(s) Installation” clause, specifically the practical handling of installations during the compliance period. Historically, the inflation hoses have been replaced only on condition (upon defect). According to LHT data, confirmed by the OEM Safran, several thousand affected hoses are in service. Many of the associated slides are older than 15 years and therefore undergo annual scheduled maintenance; consequently, a large portion of the fleet will have up to three planned shop visits before the end of the compliance time. In addition, numerous freshly overhauled slides are currently on stock and would become unserviceable with the release of the AD.

In this context, we would like to ask whether EASA would consider adjusting the wording of the AD to clarify that installations of slides not yet modified in accordance with the VSB may remain serviceable for installation during the compliance period, as long as operators ensure that the mandated modification is completed within the specified compliance time. Such a clarification within the AD wording could support operators and MROs in aligning the VSB implementation with scheduled maintenance events, making effective use of existing overhauled inventory, alleviating supply chain pressure, and avoiding unnecessary removals or operational disruptions - while fully maintaining the safety objective of the PAD.

We would appreciate a positive consideration of this proposal and would welcome an adjustment of the AD wording accordingly.

EASA response:

Comment noted. Paragraph (2.1) of the AD was amended.

Commenter 2: British Airways – Aladin Fouda – 20/01/2026



Comment # 2**a. Purpose and Justification of the PAD**

BA is struggling to understand the underlying rationale for this EASA PAD. The proposed requirements would have a significant operational and financial impact on BA, affecting approximately 500 emergency slides.

Over the past 30 years, BA has performed emergency slide overhauls across a fleet of more than one hundred aircraft and has never encountered a single issue related to the issue highlighted in this PAD and VSB on the inflation hoses. We currently operate hoses over 20 years old that continue to pass all required tests during overhaul and do not show any signs of damage due to the packing procedures. BA operate number of slides that are over 15 years old and therefore fall within the yearly overhaul ethos for these units.

Based on our experience, BA strongly believes that the issue is related to maintenance practices rather than material quality.

Could you please clarify:

- o Were the findings isolated to a single maintenance provider, or were they observed across multiple sites?
- o Which maintenance locations have reported these issues?

Given this context, BA believes the proposed AD should either be withdrawn or reoriented toward reviewing maintenance processes at the effected locations rather than mandating material replacement.

b. Clarification on Applicability Linked to Hose Manufacturing Dates

SAFRAN VSB A320 004-25-130 §1.C states that an improved swivel fitting design was introduced to increase resistance to side loads, incorporated into inflation hose assembly P/N 68906-101 at S/N 4407 in 2015. The VSB further recommends replacing all inflation hose assemblies with P/N 63667-Series and P/N 68906-101 below this serial number threshold.

Should the EASA AD proceed, BA kindly requests that the AD explicitly specify that any inflation hose assembly manufactured prior to 2015 or 2016 must be replaced. This allows airlines to workout which slides will be applicable to this change by the workshop packs as the packs only record the hose DOM and not the PN SN. BA believes this approach provides clearer guidance for the operational units and reduces the risk of misinterpretation.

c. Request for Extended Compliance Period

BA also wishes to highlight that VSB A320 004-25-130 indicates that P/N 68906-101 is supplied in batches of 10 units and carries a lead time of 19 weeks. This lead time, combined with the volume of required replacements, makes the proposed 36 month compliance period insufficient for BA to procure the necessary spares and complete the mandated actions within the timeframe,

We therefore request that EASA consider extending the compliance period by 6 months to all for material organisation with Safran as it appears airlines of a similar size to BA will require 400 plus units at first estimates.



EASA response:**Comments noted.**

A. The issue is mainly related to a design weakness which leads to the fracture and separation of the connector on the inflation hose due to an incorrect placement of a banding board over the swivel fitting during the folding/packing process for these evacuation slides. For this reason the AD cannot be reoriented purely to MRO entities.

B. The identification of the affected population via S/N is more accurate, furthermore the VSB instructions address the affected S/N and not the P/N with a given DOM.

C. The available data provided do not support an extension of the compliance time in the AD. Anyhow, please note the update of (2) in the AD.

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

Commenter 3: SAS Scandinavian Airlines System – Hamdi Nouira – 30/01/2026
Comment # 3

According to the PAD, as of the AD's effective date, only a serviceable slide may be installed on the aircraft.

However, the pool provider for new slides has informed us that, due to a shortage of serviceable hose assemblies, they cannot guarantee the availability of fully serviceable slides. As a result, there may be cases where we are required to install an affected slide after the effective date of the AD, with the understanding that this slide would be replaced again before the AD's final compliance date.

We therefore kindly request that the text of the PAD/AD be adapted to explicitly allow operators to install an affected slide after the effective date, provided that it is replaced with a serviceable slide before the AD due date.

Thank you for your consideration.

EASA response:

See answer to Comment 1.

Commenter 4: Austrian Airlines – Martin Pfannhauser – 30/01/2026


Comment # 4

On the one hand, affected slides have to be replaced on the aircraft with a serviceable slide within 36 months after effective date; on the other hand, from the effective date of this AD, it is only allowed to install a serviceable slide.

Due to the fact that these slides might have already a reduced inspection interval of 12 months, a high amount of spare hoses will already be required during shop visit within the first year after the effective date.

We have serious concerns that the availability of spare hoses for the world fleet does not match the required demand according to the subject AD.

It would be highly appreciated if EASA could re-evaluate this AD in order to introduce a general compliance time of 36 months, also for slides getting installed after the effective date.

EASA response:

See answer to Comment 1.

Commenter 5: ANA HOLDINGS INC.– Yoshikazu Kondoh – 04/02/2026**Comment # 5****a. [Request] Allowance of Maintenance Record Review for Slide Identification**

The referenced Service Bulletins (SB A320-25-1CML / SB A320-25-1CMM) imply a requirement for physical inspection of the aircraft to determine if an "Affected slide" is installed. However, the Part Numbers (P/N) and Serial Numbers (S/N) of the door evacuation slides are typically traceable through aircraft maintenance records. We request that a provision be added to the final AD to allow the identification of affected slides (as listed in Appendix 1) through a review of maintenance records in lieu of physical inspection, provided that the P/N and S/N can be positively determined from those records.

b. [Inquiry] Regarding Verification of Inflation Hose Installation

The definition of "Affected slide" includes those on which an inflation hose has been replaced in service with an "Affected hose". Could you please confirm that verifying whether an "Affected hose" has been installed in service can be accomplished solely by reviewing the maintenance records of the slide, provided that such records are available and complete?

c. [Request] Update the Definition of "Serviceable slide"

The current definition of "Serviceable slide" refers generally to slides that are "not an affected slide". To provide further clarity and avoid potential ambiguity during field inspections, we request to explicitly include the following in the definition:

"Any door evacuation slide with a P/N and S/N not listed in Appendix 1 of this AD , provided that no affected hose has been installed in service on that slide."

These clarifications and the allowance for record reviews would align with standard industry practices and avoid unnecessary physical inspections while maintaining the intended level of safety.

EASA response:

- A. *The identification of affected slides / affected hose through a review of maintenance records in lieu of physical inspection is acceptable, provided those records can be relied upon for that purpose. EASA does not agree to add such statement in the AD.***
- B. *See answer above.***
- C. *Comment noted. The definitions as currently described in the AD are seen as sufficient.***

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

Commenter 6: TAP Air Portugal – Miguel Carvalho – 04/02/26

Comment # 6

Regarding PAD 26-002, we have some concerns regarding the interaction between paragraph (1) of Required Actions, and the usage of the definitions of affected part and serviceable part.

As it is written in the PAD, affected parts are either the identified P/N and serial number in Appendix 1, or the identified P/N with a not identified serial number if there are no maintenance records that show no affected hose has been installed in service.

By this definition and the definition of serviceable part, when an affected part with a P/N and serial number identified in Appendix 1 is inspected and reidentified per instructions of the VSB, it does not cease to be an affected part.

So we ask, if a Group 1 aeroplane has an affected slide, but maintenance records indicate that slide has already been inspected and reidentified as per VSB, and is a serviceable slide by the definition in this PAD, is replacement of said slide still required as per parag. (1) of Required Actions?

From our interpretation of the wording used in the PAD, the aforementioned serviceable slide has to be replaced within 36 months after the effective date of the AD, which appears not to be in line with the intention of this directive. Not only that, but this can generate confusion in case an affected



slide that is also a serviceable slide, is installed after the 36 months, or just before that threshold, as the wording allows for its installation, but does not revoke the need to replace it within 36 months.

From our interpretation, there is a possibility an aeroplane does not have an affected slide during the 36-month period, and so does not require the accomplishment of the SB. Then, if after the period an affected and serviceable slide is installed, at that point the aircraft is immediately due on the requirements of paragraph (1) of the PAD.

This is a situation we believe is not in line with the intent of the PAD, adds no additional value to elimination of the unsafe condition, and will only put extra effort on the maintenance requirements for operators. As such, we kindly suggest changing the wording of paragraph (1) to the following:

“For Group 1 aeroplanes: Within 36 months after the effective date of this AD, replace each affected slide that is not a serviceable slide, with a serviceable slide in accordance with the instructions of the SB.”

Another suggestion could be to change the first paragraph of the definition of an affected slide to something like:

“Door evacuation slides having a P/N and s/n as identified in Appendix 1 of this AD, which have not been inspected and reidentified ‘MOD PER S.B. A320 004-25-130’ or ‘INSP. PER S.B. A320-004-25-130’ in accordance with the instructions of the VSB and on which, after that inspection, no affected hose has been (re-)installed.”

EASA response:

Please note the definition of the affected and serviceable slide in the AD. One part of the definition of a serviceable slide is that those can be affected slides, which have been inspected and reidentified, as further clarified in the AD.

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

Commenter 7: LATAM Airlines – Beatriz Cesar Malave – 05/02/26

Comment # 7

We would like to submit the following comments regarding EASA PAD No. 26-002, in particular paragraph (2) “Part(s) Installation”.

According to the current wording of paragraph (2), from the effective date of the AD it is allowed to install an affected slide on any aeroplane, provided it is a serviceable slide, as defined in the PAD. A serviceable affected slide requires confirmation that the slide has been inspected in accordance with the referenced SB/VSB and that no affected inflation hose has been (re-)installed thereafter.



In our operation, we do not have direct visibility or control of the inflation hose part number or serial number unless a specific inspection per the SB/VSB is performed. As a consequence, in order to ensure that a slide is “serviceable” per the PAD definition, we would be required to inspect each slide prior to installation.

Considering the size of our slide inventory (over 900 units), this creates a significant operational risk, as it would effectively prevent the installation of slides unless they have been individually inspected beforehand, potentially impacting aircraft availability without a considerable safety benefit.

We would like to propose an alternative approach that we believe preserves the safety intent of the PAD while reducing unnecessary operational constraints:

Part(s) Installation:

(2) It is allowed to install an affected slide on any aeroplane, provided it is a serviceable slide, as defined in this AD:

(2.1) For Group 1 aeroplanes: After the replacement as required by paragraph (1) of this AD

(2.2) For Group 2 aeroplanes: From the effective date of this AD

This approach would ensure that the aircraft already in full compliance are not re-exposed to the unsafe condition, while avoiding the need to inspect the entire slide pool prior to installation on an aircraft that are still within the allowed compliance window.

We kindly request EASA’s consideration of this comment and clarification on whether such an interpretation or adjustment could be reflected in the final AD.

EASA response:

See answer to comment 1.

Commenter 8: United Technical Operations – Oscar Fernandez – 05/02/26

United Airlines Engineering has reviewed EASA PAD 26-002 in its entirety and offer the following comments:

- a. The work scope detailed in EASA PAD 26-002, Airbus SB A320-25-1CMM, Airbus SB A320-25-1CML and Safran VSB A320 004-25-130 is feasible.
- b. The proposed 36-month compliance time after the effective date of the AD needs to be reconsidered to a longer time frame (48 months from AD Effective Date). Safran VSB A320 004-25-130 mention a lead time of 19 weeks for the Inflation Hose Assembly P/N 68906-101.
- c. As of today, United Airlines has 109 aircraft affected by the proposed AD which is a total of 436 Evacuation Slides.



EASA response:

A. Comment noted.

B. The available data provided do not support an extension of the compliance time in the AD. Anyhow, please note the update of (2) in the AD.

C. Comment noted.

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

