

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-034

Published on 13 March 2026 and officially closed for comments on 10 April 2026

Commenter 1: Cathay Pacific Airways Limited – Ivan Leong – 18/03/2026

Comment # 1

Referring to Paragraph 1 Note 2, in the case of component swapping between aircraft, CPA would like to be confirmed that the removal of an affected part from an aeroplane and subsequent reinstallation of that affected part on another aeroplane without the component having a shop visit, is also not considered as 'installation'.

EASA response:

Comment noted. As per Note 2 of the AD, the reinstallation of the affected part, to be not considered "installation" as per paragraph (1) and (3), must occur on the same aeroplane (during a single maintenance visit). Consequently, the removal of an affected part from one aircraft and reinstallation on a different aircraft qualifies as "installation". Note 2 of the AD has been slightly amended, stressing that the removal of an affected part must occur without return to shop for rework.

To be noted that as per Note 1 the SB provides instructions on how to modify an affected part into a serviceable one on-wing, hence without going through a shop visit.

Commenter 2: China Southern Airlines Co., Ltd. – An ChunYang – 25/03/2026

Comment # 2

We would like to raise the following comments regarding EASA PAD 26-034.

a. Compliance time vs. identification of affected parts

The PAD requires compliance: "within 22 months since last installation of an affected part..."

However, identification of affected parts relies on records review or GVI in accordance with SB A350-27-P079.



This creates a concern that, at the time of identification, the affected part may already be close to or beyond the 22-month limit, leading to potential unintended non-compliance.

In addition, the PAD does not define:

- a timeframe for completion of identification (records/GVI), or
- a grace period following identification.

We request clarification on:

- how to treat cases where the 22-month limit is exceeded at the time of identification, and
- whether compliance time should be linked to identification rather than historical installation date.

b. Alignment between Airbus SB and MOOG SB

The PAD references Airbus SB A350-27-P079 R01 and several MOOG SBs.

We note that:

Airbus SB introduces -1XX configurations,

while MOOG SBs do not reflect equivalent configuration or upgrade path.

In practice, embodiment of the Airbus SB requires additional coordination with Airbus and MOOG (e.g. RIL and material provisioning), which is not reflected in the PAD.

We request clarification on:

- whether -1XX configuration is required for compliance, and
- how operators are expected to obtain the necessary approvals and materials.

c. Definition of “installation”

Compliance is based on “last installation of an affected part”.

We request clarification on whether:

- removal and reinstallation of the same part during maintenance, or
- shop visit/interchange,

would constitute a new installation and reset the compliance time.



EASA response:

- a. Comment not agreed. It is the responsibility of the operator to ensure that all the AD requirements are complied with, at any point in time. It is therefore expected that operators determine whether they are in possession of any affected unit in a suitable timeframe, so to ensure compliance with the AD requirements in general, and with paragraphs (1) and (2) in particular, in a commensurate timeframe (e.g. so to ensure that the rectification times therein are not breached, in any eventuality).**

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

- b. Comment noted. The commentor is invited to refer to the SB and eventually liaise with Airbus in case further clarification is needed.**

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

- c. Comment noted. The AD content, with particular reference to Note 2, already provides the clarification sought.**

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

