

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-037

Published on 23 March 2026 and officially closed for comments on 20 April 2026

Commenter 1: Cathay Pacific Airways Limited – Matthew Chu – 31/03/2026

Comment # 1

- A. For paragraph (1): The applicable SB, “Airbus Service Bulletin (SB) A330-53-3227 Revision (rev) 03 for cargo compartment structure and SB A330-53-3228 rev 01 for cabin compartment structure, as applicable” have been listed. Please note the followings:
- For SB A330-53-3228, operator could have performed rev 00 (with additional work in rev 01 or rev 02) or rev 02. If only SB A330-53-3228 rev 01 is called out, paragraph (1) cannot be fulfilled if the aforementioned SBs were performed.
 - For SB A330-53-3227, operator could have performed rev 00, 01 or 02. If only SB A330-53-3227 rev 03 is called out, paragraph (1) cannot be fulfilled if the aforementioned SBs were performed.

For SB A330-53-3228, CPA understands if SB rev 00 was previously performed, paragraph (2) Additional work 1 is required.

For SB A330-53-3227, CPA understands if SB rev 01 was previously performed on the A330 aeroplanes (except A330-223F and A330-243F) without incorporating the instructions given in TA 80357529/004/2017, paragraph (3) Additional work 2 is required.

However, based on the current PAD requirement, it will still be out of compliance of paragraph (1) even if the additional work has been performed as SB A330-53-3228 rev 00 and SB A330-53-3227 rev 01 are not included in the applicable SBs and not in the paragraph (5) and (6) credit. Due to the above, CPA proposes to update the applicable SB as “Airbus Service Bulletin (SB) A330-53-3227 original issue (or later approved revisions) for cargo compartment structure and SB A330-53-3228 original issue (or later approved revisions) for cabin compartment structure, as applicable”, or grant credit for SB A330-53-3228 rev 00 and SB A330-53-3227 rev 01.

- B. For paragraph (2) Additional Work 1, CPA proposes to update the final sentence as “accomplish an SDI of the additional affected parts in accordance with the instructions identified as “additional work” in Airbus SB A330-53-3228 rev 01 (or later approved revisions)” since SB A330-53-3228 rev 02 could be referred for the additional work.
- C. For Ref. Publications “Airbus SB A330-53-3227 original issue dated 18 August 2015, rev 01 dated 05 July 2016, rev 02 dated 18 July 2025 and rev 03 dated 19 September 2025”, rev 02 should be dated 25 July 2018 instead of 18 July 2025, please confirm if the date will be updated.

EASA response:

Comment 1A) Comment agreed. Final AD has been updated accordingly.



Comment 1B) Not agreed. Later revisions of the referenced SB are acceptable for compliance. Please refer to the standard sentence “The use of later approved revisions of the above-mentioned documents is acceptable for compliance with the requirements of this AD” in section “Ref. Publications” of the AD. No changes have been made to the Final AD in response to this comment.

Comment 1C) Comment agreed. Final AD has been updated accordingly.

Commenter 2: Air Canada – Bert Liu – 15/04/2026

Air Canada would like to receive comments from EASA of the following, concerning PAD 26-037.

The superseded AD 2018-0147 and 2015-0212 required to inspect and if required for parts to be replaced as per SB A330-53-3228 Revision 01.

Yet this PAD has no mention of any credit given if we previously complied to this applicable SB A330-53-3228 Revision 01 prior to the issuance of the PAD.

Can you please review to include the Credit to be given for all applicable aircraft if SB A330-53-3228 Revision 01 prior to the issuance of the AD/PAD can be considered as acceptable for compliance to the requirement of para. (1) and (4) of the AD/PAD?

EASA response:

Comment noted: Actions accomplished on an aeroplane before the effective date of the AD, in accordance with the instructions referenced in the AD, are acceptable for compliance. Please refer to the standard sentence “Required as indicated by this AD, unless the action(s) required by this AD have been already accomplished:” at the beginning of section “Required Action(s) and Compliance Time(s) of the AD.

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

