



## EASA Safety Information Bulletin

**SIB No.:** 2010-15R1  
**Issued:** 29 September 2010

**Subject:** **Improper Maintenance of Safety Belts / Torso Restraint Systems**

**Background:** EASA was informed by a Member State Competent Authority with regard to maintenance performed by organisations approved in accordance with Annex II (Part 145) to Regulation (EC) No. 2042/2003 while not using applicable current maintenance data. This information had been subsequently confirmed by standardisation inspections performed by the Agency. This SIB Revision 1 is issued to inform that Part 145 maintenance organisations not complying with the CMM and not holding other applicable maintenance data have been found in other European countries, as mentioned below.

**Description:** According to Part 145.A.45 the organisation maintaining a component shall hold and use applicable current maintenance data in the performance of maintenance, including modifications and repairs. Maintenance data include the applicable instructions for continuing airworthiness, issued by type certificate holders, supplemental type certificate holders and any other organisation required to publish such data in accordance with Part 21.

For safety belts / torso restraint systems the applicable maintenance data is included in the Component Maintenance Manual (CMM) provided by the design approval holders. The CMM may contain limitations to certain maintenance and repair tasks. When present, such limitations cannot be regarded as absence of applicable maintenance data. At the same time, production drawings cannot be considered as maintenance data, unless indicated as such by the Design Approval holder.

According to the inspections performed, the Agency found that some Part 145 maintenance organisations in Germany, Austria and the Netherlands did not comply with the CMM and did not hold other applicable maintenance data. Therefore safety belts and torso restraint systems maintained by them are regarded as non-airworthy, thus potentially unsafe and the release certificates (EASA Form 1) issued by these organisations are considered invalid.

In accordance with subsequent information received, EASA is continuously investigating this situation further, since there could be other Part 145 maintenance organisations in and outside Europe in the same position.

With regards to 'applicable maintenance data', the Agency has no evidence of the specific approval of maintenance data for this purpose,

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issued before 28 September 2003 (date of entry into force of Part 21) by any National Aviation Authority (NAA), which could be considered valid in accordance with EC Regulation No. 1702/2003 Article 2b.

Additionally, maintenance procedures approved by NAAs before 28 November 2003 (date of entry into force of Part 145) cannot be used after that date if not in compliance with the EU rules, taking into consideration that Part 145.A.45(b)(4) differs, in this respect, from JAR 145.45(b)(5) and does not allow the continuation of NAAs to approve standard practices as maintenance data. According to Part-145, only the Agency can approve alternative applicable maintenance data from those provided by the design approval holders.

In the particular case of safety belts and torso restraint systems, the replacement of the webbing being done not in accordance with applicable maintenance data shall be considered as a design change, and more specifically as a repair.

In accordance with Part 21A.611, such a design change of equipment certificated in compliance with an ETSO can only be performed by the ETSO holder, in case of Minor Change, or approved through a new ETSO certification and re-identified by means of new Part Numbers in all other cases

In alternative to the above, the repair approval can also be achieved by any legal person or entity (including maintenance organisations) through EASA in accordance with Part 21, by issuance of a Minor Change at aircraft level for safety belts and restraint systems on statically tested seats. The repair approval for safety belts and restraint systems to be installed on dynamically tested seats could only be performed through a Major Change process, requiring an STC when the applicant is different from the aircraft TC Holder. In all cases, the approval shall involve the definition of a new Part Number and instructions for Continuing Airworthiness.

**Applicability:**

All safety belts and torso restraint systems installed on any aircraft and/or held as spare parts, having been maintained after the date of 28 November 2003 without the use of applicable current maintenance data. Safety belts and torso restraint systems that could be possibly affected by this SIB are those reporting on the labels stitched to the web indications of maintenance organisations different from the original manufacturers or not included in the list of the maintenance organisations approved by the original manufacturers.

The following table lists the design holders that, at the current knowledge of the Agency, are explicitly forbidding in their CMM the replacement of webbing:

<b>Company</b>	<b>Country</b>
AmSafe	U.S.A.
Anjou Aeronautique (formerly TRW Repa S.A., formerly L'Aiglon)	France

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Autoflug	Germany
Davis Aircraft Products Co.	U.S.A.
Schroth Safety Products GmbH	Germany
Pacific Scientific	U.S.A.

The above list may be not exhaustive. The Agency is continuously investigating this situation further and will update this SIB when appropriate.

**Contacts:**

Any affected legal person or entity should contact their National Aviation Authority ([NAA](#)) for further clarifications and instructions.

For further information on the content of this SIB, contact the Airworthiness Directives, Safety Management & Research Section, Certification Directorate, EASA. E-mail: [ADs@easa.europa.eu](mailto:ADs@easa.europa.eu).  
For any report on new cases relevant to the subject of this SIB, contact Standardisation Department, EASA.  
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