

## FAA Significant Standards Differences

Amendment Pair: 14 CFR Part 25 Amendment 25-130 and CS-25 Amendment 10

*Note: List updated 11/27/2023 – reference 25.1093, 25.1093 (b)(1), 25.1103 (a), 25.1333 (b), and 25.1529.*

### **General Comments and Assumptions:**

This following list of SSD regulations which require direct FAR compliance is based on the FAR/CS 25 Amendment pair noted in the header.

1. This SSD list includes only regulations where compliance with the CS minimum standard would not be accepted by the FAA. (NOTE: The SSD list is identified as the “FAA-SSD” list to clarify that it is only intended for FAA validations of EASA products).
2. According to the “Type Validation Principles”, only regulations that have a regulatory difference will be included in the SSD list. Identical regulations that have differences in guidance/interpretive material will be addressed, if required, as separate Validation Items (VI).
3. The definition of SSD from the “Technical Implementation Procedures for Airworthiness and Environmental Certification between the Federal Aviation Administration of the United States of America and the European Aviation Safety Agency of the European Union,” is repeated below:  
“Significant standards difference (SSD)” means a validating authority (VA) airworthiness standard that has no certificating authority (CA) equivalent, which results in a difference that may require type design changes, approved manual changes, or the imposition of operational limitations to meet VA standards. The type design or operation approved by the VA could then differ from the design and/or operation approved by the CA.
4. CS 25 does not provide standards for reciprocating-powered airplanes, skiplanes, amphibians, flying boats, or airplanes with standby rocket engines. Differences concerning standards for those airplanes are not reflected in this list.

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FAR Sections	Guidance	Remarks
<b>Subpart A</b>		
25.3		FAR requires compliance with Appendix K for ETOPS type design approval. Neither FAR 25.3 nor Appendix K have a corresponding CS.
<b>Subpart B</b>		
25.107(e)(1)	AC 25-7	FAR requires greater margin of VLOF over VMU than CS for airplanes that are geometry-limited or elevator power-limited
25.177(d)		FAR is more stringent. For larger rudder angles than used in normal operations, CS-25 only requires compliance at normal operating speeds and the associated all-engines-operating engine power settings, while the FAR requires consideration of a broader speed range.
<b>Subpart C</b>		
25.307(a)		Difference in judgment and practice. Sometimes FAA requires limit tests while EASA accepts analysis, other times EASA requires ultimate load tests while FAA accepts limit tests.
25.365		FAR includes structural design considerations for operation above 45,000 feet.
25.562(b)		FAR applies to all seats; CS excludes flight deck crew seats
25.571(b)		FAR requires special consideration of widespread fatigue damage (WFD) and verification by full-scale fatigue test that WFD will not occur. CS includes provisions for using residual strength loads less than limit.
25.571(e)	AC 25.571-1D, AC 20-128	FAR requires consideration of uncontained rotor and fan damage to structure not limited to pressurized compartments
<b>Subpart D</b>		
25.621		The FAR does not allow the same reduction in casting factors based on compensating factors as provided by the CS
25.631		FAA rule is specific to empennage structure and requires consideration of 8 pound bird impact, while the CS requires consideration of 4 pound bird for all structure, including empennage.

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25.671(c)(1)		The more stringent FAA requirement mandates single failures regardless of probability.
25.795(a)(3)	AC's 25.795-1A, -2A, -3, -4, -5, -6, -7, -8	FAR 25.795 (a)(3) is more stringent for bulkhead, door, and boundary penetration resistance requirements.
25.809(a)		FAR has a requirement for each emergency exit to have means to permit viewing of the conditions outside the exit, including likely areas of evacuee ground contact, when closed.
25.809(i)		FAR has a requirement for each emergency exit to have a means to retain the exit in the open position, once opened in an emergency, with a positive action necessary to disengage.
25.810(a)(1)(iv)		FAR includes more stringent erection times for escape slides.
25.811(g)		FAR is more stringent, it does not allow universal symbolic exit signs.
25.812(g)(1)(ii)		FAR requires minimum acceptable overwing emergency exit illumination of 42 inches for a Type A overwing exit and two feet for all other overwing emergency exits.
25.812(b)(1)(i), 25.812(b)(1)(ii) and 25.812(b)(2)		FAR is more stringent, it does not allow universal symbolic exit signs and has requirements for exit marking letter size and background area.
25.813		FAR 25.813 (b) specifies assist space size and that it be equipped with a handle whereas the CS does not. FAR 25.813(e) applies to doors between any passenger seat that is occupiable for takeoff and landing and an emergency exit, while the CS applies only to doors between passenger compartments. FAR 25.813(f) is applicable to crew member seats, while CS is applicable to passenger seats.
25.831(a)	AC 25-20	FAR has different cabin ventilation requirements
25.831(g)	Policy Memo No.: 00-113-1034, dated 4-Jan-01	Unique FAR requirement for temperature exposure time requirements.
25.841	AC 25-20, Policy	FAR establishes cabin pressure altitude requirements for failure scenarios not shown to be extremely

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	Memo No.: ANM-03-112-16, dated 24-Mar-06	improbable.
25.853(f)		Requirement to designate the allowed smoking section is specific to the FAR
25.851, 25.855, and 25.857		The FARs do not allow a Class F cargo compartment as provided by the CS.
<b>Subpart E</b>		
25.901(c)		The FAA requires the fail-safe concept - no failure(s) will jeopardize the safe operation of the airplane. CS requires compliance with CS 25.1309. FAR includes the “fail-safe” requirements as part of the rule in 25.901. Fail-safe is applied by guidance in 25.1309 and is therefore not mandatory by 25.1309.
25.901(d)		The FAA requires that the APU installation meet the applicable provisions of subpart E (application of engine installation requirements). EASA has clearly defined requirements in CS-25 subpart J.
25.933(a)(1)		The FAR does not allow demonstration that in-flight thrust reversal is extremely improbable as a compliance method, however the FAA routinely accepts it as an equivalent safety finding.
25.963(e)	AC 25.963-1	The CS includes an exception that fuel tank access panels need not be more fire resistant than the surrounding fuel tank structural material. The FAR does not.
25.981	Policy Memo No.: ANM-112-08-002, dated 5/26/09 AC 25.981-1C	The FAR is more stringent. FAR 25.981(a)(3) requires that an ignition source cannot result from each single failure, from each single failure in combination with each latent failure condition not shown to be extremely remote, and from all combinations of failures not shown to be extremely improbable. These ignition source requirements must be met with consideration of the effects of manufacturing variability, aging, wear, corrosion, and likely damage. CS 25.981(a)(3) only requires demonstrating that an ignition source does not result from each single failure and from all combinations of failures not shown to be extremely improbable using CS 25.1309. FAR 25.981(b) requires the flammability exposure of tanks other than a main

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		tank meet the requirements of Appendix M if any portion is located within the fuselage contour, which may require the installation of a Flammability Reduction Means (FRM). CS 25.981(b) only requires an active FRM meet the requirements of App. M to CS 25 if an FRM is needed to meet the 3% fleet average flammability requirement.
25.1093	AC 20-73; Policy memo dated 8/3/1992	FAA requires demonstration of capability to operate the engine and essential APU under the conditions of falling and blowing snow. FAA has issued policy memorandum dated August 3, 1992 regarding conditions that must be considered.
<b>Subpart F</b>		
25.1317	AC 20-158	FAR has additional airworthiness requirements for HIRF Protection with Appendix L containing HIRF Environments and HIRF test levels for Equipment. Neither FAR 25.1317 nor Appendix L have a corresponding CS.
25.1447(c)(3)		The FAR is more stringent requiring installation of flight crew member oxygen dispensing equipment equipped with certain design features depending on the flight level operation or exposure to cabin pressure altitudes exceeding 34,000 feet during a decompression which is not extremely improbable."
25.1447(c)(4)		FAR requires that portable oxygen equipment must have the oxygen dispensing unit connected to the portable oxygen supply.
25.1457		The FAR is more stringent, it requires in (d)(6) physical separation of the DFDR and CVR, improved CVR power supply reliability and recording of certain data link communications in (a)(6).
25.1459		The FAR is more stringent, it requires physical separation of the DFDR and CVR, and improved DFDR power supply reliability.

FAR Sections	Guidance	Remarks
<b>Subpart G</b>		
25.1529		CS does not include Fuel System Limitation requirements in Appendix H25.4. Also, FAR H25.4 refers back to 25.571 which is an SSD.

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25.1535		FAR refers to ETOPs airworthiness requirements of Appendix K. FAR Appendix K does not have a corresponding CS, however FAR K25.1.1 and K25.1.2 are covered in CS 25.1535.
25.1583(a)(3)		The FAR is more stringent, paragraph (a)(3) requires statements for compliance that rapid and large alternating control inputs, especially in combination, could result in structural failures even below the maneuvering speed.
<b>Subpart H</b>		
25.1729	AC 25-27A	FAR requires EWIS instructions for continued airworthiness (ICA) to be approved by the FAA whereas CS 25.1729 does not require EASA approval.