

EASA Regulatory Update – September 2026

Key Regulatory Developments, Challenges and Best Practices

September 2026 saw EASA progress several important regulatory initiatives affecting aircraft certification, additional airworthiness requirements, continuing airworthiness and unmanned aircraft operations.

Sofema Aviation Services reviews the principal developments, the regulations and certification specifications being amended, and the practical considerations for affected aviation organisations.

1. Initial Airworthiness – Proposed Update of CS-25 Large Aeroplanes

NPA 2026-03 – Regular Update of CS-25

Published: 7 September 2026

Consultation closes: 7 December 2026

What is being updated?

NPA 2026-03 proposes amendments to the **Certification Specifications and Acceptable Means of Compliance for Large Aeroplanes – CS-25**.

It is therefore primarily an **initial airworthiness / aircraft design certification development**, rather than an amendment to Part-21 itself.

EASA has selected 20 mature certification subjects for amendment, including:

- prevention of incorrect assembly or adjustment of system elements;
- alternative fire-extinguishing agents;
- landing-gear safe separation;
- pneumatic systems;
- prevention of passenger entrapment between movable seat components;
- evacuation route protection;
- life-preserver container installation;
- composite aircraft seat structures;
- exit-sign visibility;
- safety-assessment standards;
- equipment, systems and installations associated with CS 25.1309;
- technology-agnostic requirements for energy-supply devices;

- Ram Air Turbine blade release;
- flight-control operation tests;
- CS 25.1322 Flight Crew Alerting;
- inadvertent flight-guidance-system capture of glideslope sidelobes;
- physical secondary barriers for security; and
- powerplant fire-protection shut-off means.

The proposal is intended to incorporate current certification experience and best practice, address safety recommendations and improve harmonisation with corresponding FAA requirements.

Issues & Challenges

For DOAs and certification teams, this is not one single technical change. The twenty subjects affect different design disciplines and compliance demonstrations.

Particular attention should be given to safety assessment, flight crew alerting, energy-storage technologies, fire protection, system installation and human-factors-related design requirements.

Best Practices

Design organisations should establish an **NPA 2026-03 impact matrix**, identifying which proposed CS/AMC amendments affect their products, certification procedures and existing means of compliance.

As the consultation remains open until 7 December 2026, affected organisations should also determine whether technical comments should be submitted to EASA.

[EASA NPA 2026-03 – Regular Update of CS-25](#)

2. Additional Airworthiness & Operations – Take-Off Performance Monitoring

CRD 2025-01 / Opinion No 07/2026

Published: 22 September 2026

What regulation is being changed?

EASA Opinion No 07/2026 proposes an amendment to:

Commission Regulation (EU) 2015/640 – Additional Airworthiness Specifications for Operations, specifically Annex I (Part-26).

The proposal would introduce new additional airworthiness requirements for a Take-Off Performance Monitoring System (TOPMS) on applicable large aeroplanes used in Commercial Air Transport.

The requirement would apply to relevant aeroplanes produced six years or more after the future amending Regulation enters into force. It is therefore important that this is not presented as a current retrofit requirement for the existing CAT fleet.

What is EASA addressing?

The regulatory action addresses the risk of accidents and serious incidents caused by:

- incorrect take-off performance parameters;
- erroneous aircraft position;
- incorrect runway-related information; and
- failures to detect discrepancies before or during take-off.

The TOPMS concept therefore provides an additional technological defence against take-off performance errors rather than relying exclusively on procedural and flight-crew cross-checking.

Issues & Challenges

The development crosses traditional regulatory boundaries.

It affects aircraft manufacturers and DOAs through system design and certification, while operators must consider aircraft performance procedures, flight crew interaction and training.

CAMOs may ultimately need to manage associated modifications, configuration and continuing-airworthiness instructions.

Best Practices

Operators should review existing defences against erroneous take-off performance data.

Manufacturers and design organisations should assess the likely certification and integration implications.

CAMOs should monitor future manufacturer information and modification requirements but should **not treat Opinion 07/2026 as an already-applicable Part-26 requirement**.

[EASA Opinion No 07/2026 – Take-Off Performance Parameters and Position Errors](#)

3. Initial Airworthiness – Engine Certification Requirements Updated

CRD 2025-08 / ED Decision 2026/009/R – CS-E Amendment 9

Published: 25 September 2026

What has been amended?

Through **ED Decision 2026/009/R**, EASA adopted **Amendment 9 to CS-E – Certification Specifications and Acceptable Means of Compliance for Engines**.

This is an **adopted EASA certification-specification amendment**, rather than an NPA or proposed future change.

The amendment updates engine certification requirements concerning:

- turbine-engine transient over-temperature, over-speed and over-torque limit approval;
- medium bird strike and ingestion, including additional integrity assessment;
- turbine-engine safety analysis;
- vibration and endurance testing for piston engines installed on rotorcraft;
- propeller blade pitch-control-system components forming part of the engine type design;
- engine-control-system development errors;
- turbine-engine thrust or power ratings achieved during endurance testing;
- removal of references to CS-34; and
- editorial corrections.

A significant objective is to reflect current engine-certification practice while improving harmonisation between **EASA CS-E and FAA engine-certification requirements**.

Issues & Challenges

Engine manufacturers and relevant DOAs need to establish which revised provisions affect new certification projects and changes to existing approved designs.

Particular attention should be given to safety analysis and engine-control-system development errors, where certification evidence and internal engineering processes may require review.

Best Practices

Organisations should perform a delta assessment between their current certification practices and **CS-E Amendment 9**, followed by targeted updates to:

certification plans → compliance checklists → engineering standards → means of compliance → competence requirements.

[EASA ED Decision 2026/009/R – CS-E Amendment 9](#)

4. Continuing Airworthiness – Corrected Part-M AMC & GM

AMC & GM to Part-M – Issue 2, Amendment 10

Corrected file issued: 22 September 2026

This September development needs to be understood in the context of the larger regulatory package.

What Decision does it belong to?

AMC & GM to Part-M – Issue 2, Amendment 10 was originally issued on 6 July 2026 under ED Decision 2026/005/R.

The Decision amended the AMC and GM associated with:

- Part-21 – Issue 2, Amendment 18
- Part-M – Issue 2, Amendment 10
- Part-145 – Issue 2, Amendment 9
- Part-ML – Issue 1, Amendment 4
- Part-CAMO – Issue 1, Amendment 6
- Part-CAO – Issue 1, Amendment 6.

Which Regulations does ED Decision 2026/005/R support?

The AMC/GM package supports implementation of two important regulations:

Commission Implementing Regulation (EU) 2026/100, which amends both:

- Regulation (EU) No 748/2012 – Initial Airworthiness / Part-21; and
- Regulation (EU) No 1321/2014 – Continuing Airworthiness.

Regulation 2026/100 concerns the **airworthiness review process, airworthiness certificates and occurrence reporting**, while also correcting elements of Regulation 1321/2014.

It also supports **Commission Delegated Regulation (EU) 2026/56**, which amends Regulation (EU) No 748/2012 regarding **Certificates of Airworthiness and Restricted Certificates of Airworthiness**. Regulation 2026/56 applies from **7 August 2026**.

What is the overall regulatory objective?

The combined package is intended to improve and simplify the regulatory framework governing:

Airworthiness reviews and ARC issuance

including alignment between Part-M/Part-ML airworthiness-review requirements and the issuance of Certificates of Airworthiness under Part-21.

Aircraft transferred between EU Member States

with the objective of facilitating transfer and reducing unnecessary administrative burden.

Aircraft imported from third-country regulatory systems

including requirements for establishing aircraft airworthiness status and dealing with situations where the normal exporting-authority airworthiness statement is unavailable.

Part-21 Subpart H

particularly the interface between Certificates of Airworthiness, Restricted Certificates of Airworthiness and the continuing-airworthiness review process.

Occurrence reporting

including alignment of the implementing rules and associated AMC/GM with **Regulation (EU) No 376/2014**.

So what actually happened in September?

The regulatory package itself was **not introduced in September**.

EASA specifically states that the **Part-M Issue 2, Amendment 10 file was replaced on 22 September 2026**.

Corrections were made on pages:

4, 8, 10, 11, 12, 31 and 34, **with the corrections highlighted by EASA in yellow**.

Issues & Challenges

The September issue is therefore primarily one of **regulatory document control**.

CAMOs, CAOs, Airworthiness Review Staff, competent authorities and training organisations that downloaded the July Part-M Amendment 10 may now have a superseded version in their controlled regulatory library.

Best Practices

Organisations should:

replace the earlier Part-M Amendment 10 → identify the September corrections → determine whether affected provisions have already been incorporated into the CAME/CAE → check ARC and aircraft-import procedures → verify associated training material.

For organisations involved in aircraft transfers and imports, the broader **2026/100 + 2026/56 + ED Decision 2026/005/R** package deserves particular attention.

[EASA ED Decision 2026/005/R and associated AMC/GM amendments](#)

5. UAS Operations – Security, Registration and Remote Identification

Opinion No 06/2026

Published: 18 September 2026

Which Regulations would be amended?

Opinion No 06/2026 proposes amendments to two central European UAS regulations:

Commission Implementing Regulation (EU) 2019/947 – rules and procedures for the operation of unmanned aircraft; and

Commission Delegated Regulation (EU) 2019/945 – requirements for unmanned aircraft systems and third-country UAS operators.

The initiative follows the European Commission's Action Plan on Drone and Counter Drone Security of 11 February 2026.

What would change?

The proposal contains three particularly important changes.

Verified UAS operator identity

Member States would be required to verify the identity of UAS operators before registration.

100 g threshold

The mass threshold associated with mandatory UAS operator registration and direct remote identification would be reduced from:

250 g → 100 g.

This would bring additional lightweight UAS within the regulatory framework.

UAS geographical zones

The framework would be clarified through the introduction of national conditions intended to make information concerning UAS operations more accessible and consistent across the EU.

EASA also proposes maintaining certain flexibility for Member States and alleviations for UAS operated within model-aircraft clubs and associations.

Issues & Challenges

Operators currently using UAS between **100 g and 250 g** could become subject to requirements that do not currently apply to them.

Member States will also require effective identity-verification arrangements, while operators conducting activities across national borders will need to understand geographical-zone and national-condition information.

Best Practices

UAS operators should identify aircraft in the affected weight category and assess their current registration and remote-identification capabilities.

However, the changes should be presented as **proposed requirements** until the European Commission adopts the corresponding amendments.

[EASA Opinion No 06/2026 – UAS Security Update](#)

September 2026 – At a Glance

Date	EASA Development	Regulatory Instrument Affected	Main Subject
7 Sep	NPA 2026-03	CS-25 & AMC	20 proposed large-aeroplane certification updates
18 Sep	Opinion 06/2026	Reg. 2019/947 + Reg. 2019/945	UAS security, registration, remote ID and geographical zones
22 Sep	Opinion 07/2026 / CRD 2025-01	Reg. 2015/640 / Part-26	Take-Off Performance Monitoring System
22 Sep	Corrected Part-M Amendment 10	ED Decision 2026/005/R supporting Reg. 2026/100 + 2026/56	ARC, aircraft imports/transfers, CofA interface and occurrence reporting
25 Sep	CRD 2025-08 / ED Decision 2026/009/R	CS-E Amendment 9	Engine certification

The September Regulatory Picture

September's developments demonstrate several different stages of the European rulemaking process.

NPA 2026-03 is still open for consultation.

Opinions 06/2026 and 07/2026 represent EASA proposals to the European Commission and are not yet final EU implementing requirements.

CS-E Amendment 9, through ED Decision 2026/009/R, is adopted EASA certification material.

The 22 September Part-M publication is a correction to previously issued AMC/GM, rather than a new September regulatory package.

For aviation organisations, recognising these distinctions is essential. An NPA may require assessment and stakeholder input; an Opinion requires regulatory monitoring and preparation; an adopted Decision may require implementation; and a corrected AMC/GM publication requires effective document control.