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Foreign Part-145 approvals - Components, engines and APU certifying staff

UG.CAO.00126-003

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DOCUMENT CONTROL SHEET**Reference documents****a) Contextual documents**

Applicable requirements are listed in the form "FO.CAO.00136-XXX - Foreign Part-145 approvals – Documentation Index".

b) Internal documents

Applicable document are listed in the form "FO.CAO.00136-XXX - Foreign Part-145 approvals – Documentation Index".

Log of issues

Issue	Issue date	Change description
001	13/11/2013	First issue. This document is aimed to provide the applicant with guidance material supporting the application/approval, and as such has been reviewed by Rulemaking Product Support Continuing Airworthiness Section (R.4.2).
002	01/09/2014	Update of Quality documents to implement the new corporate image of the Agency and the changes to the organization structure.
003	22/10/2015	Endorsement of comments received from stakeholders.





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0. Introduction





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0.2. Definitions and abbreviations.

Abbreviations

AMC	ACCEPTABLE MEANS OF COMPLIANCE
AMO	APPROVED MAINTENANCE ORGANISATION
AMTO	APPROVED MAINTENANCE TRAINING ORGANISATION
AOG	AIRCRAFT ON GROUND
BIPM	INTERNATIONAL BUREAU OF WEIGHTS AND MEASUREMENTS
CAO	CONTINUING AIRWORTHINESS ORGANISATION
CAP	CORRECTIVE ACTION PLAN
CIPM	INTERNATIONAL COMMITTEE ON WEIGHTS AND MEASUREMENTS
C/S	CERTIFYING STAFF
CC/S	COMPONENT CERTIFYING STAFF
EASA	EUROPEAN AVIATION SAFETY AGENCY
EU	EUROPEAN UNION
GM	GUIDANCE MATERIAL
ILAC	INTERNATIONAL LABORATORY ACCREDITATION COOPERATION
IOSRS	INTERNAL OCCURRENCE REPORTING SYSTEM
MOA	MAINTENANCE ORGANISATION APPROVAL
MOAP	MAINTENANCE ORGANISATION APPROVAL PROCEDURES
MOC	MAINTENANCE OVERSIGHT COORDINATOR
MOE	MAINTENANCE ORGANISATION EXPOSITION
MOR	MANDATORY OCCURRENCE REPORTING
MRA	MUTUAL RECOGNITION ARRANGEMENT
NAA	NATIONAL AVIATION AUTHORITY
NRAB	NATIONAL RECOGNISED ACCREDITATION BODY
OEM	ORIGINAL EQUIPMENT MANUFACTURER
PPB	PRINCIPAL PLACE OF BUSINESS
QE	QUALIFIED ENTITY
RAB	REGIONAL ACCREDITATION BODY
S/S	SUPPORT STAFF
STCH	SUPPLEMENTAL TYPE CERTIFICATE HOLDER
TCH	TYPE CERTIFICATE HOLDER
WH	WORKING HOURS
WHOC	WORKING HOURS EASA OVERSIGHT COORDINATOR





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0.3. Scope and applicability.

EASA is the Competent Authority for maintenance organisations having their principal place of business located outside the EU, as established by EASA Part 145.1 “General” and is therefore responsible for the final approval of these maintenance organisations and for establishing procedures detailing how EASA Part-145 applications and approvals are managed.

This user Guide is applicable to EASA Part-145 applicant and EASA Part-145 AMOs’ (hereafter referred as maintenance organisations) having their principal place of business located outside the EU Member States and which are not certified under the provisions of a bilateral agreement signed with the EU.

The provisions of this user guide are complementary to the requirements of Part-145 regulation “as amended” and does not supersede or replace the associated regulatory requirements.

According to the implementing rules to the Basic Regulation, the requirements for Component Certifying Staff shall be approved by the Agency in the case of maintenance organisations located outside the European Union.

0.4. Purpose.

This user guide is designed to be used by maintenance organisation and the assigned inspector when:

The maintenance organisation is:

- Defining the Component Certifying Staff qualification procedure in the MOE;
 - Assessing each Component Certifying Staff authorisation granted.
- The Assigned inspector is - As a comparison document for:
- Evaluating the Component Certifying Staff qualification procedure;
 - ensuring by sampling that Component Certifying Staff authorisation granted are compliant with the minimum criteria addressed in this guidance.

0.5. Entry into force

This User Guide comes into effect 90 days after publication on the EASA website

0.6. Associated instructions

EASA has developed associated instructions (user guides, Forms, templates and work instructions), that detail specific matters, which have to be considered as an integral part of this procedure.

A complete listing of these documents, together with their applicability to the maintenance organisation or NAA / QE / EASA, is addressed in the current revision of the “Foreign Part-145 approvals – documentation Index”, FO.CAO.00136-XXX (XXX identifies the revision number). Documents which are applicable to both NAA/QE/EASA and maintenance organisation are made available on the EASA Web Site (<http://easa.europa.eu>) - Continuing Airworthiness Organisations page.

Each time a cross reference is provided to another document or another chapter / paragraph of the same document, this reference is identified with grey text.

0.7. Communication

All documents and correspondences between the maintenance organisation, the overseeing authority and EASA shall be in the English language unless otherwise agreed by EASA.





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1. Component certifying staff





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1.1. **Component certifying staff definition.**

Component Certifying Staff (CC/S) means staff authorised by the [maintenance organisations](#) to release Engines, APU and components under the EASA Part-145 approval.

1.2. **Component certifying staff authorization procedures.**

For a standardisation purpose, when a maintenance organisations is nominating component certifying staff, the maintenance organisations shall detail in its maintenance Organisation Exposition (MOE) the relevant CC/S authorisation procedures (initial and renewal) together with the adequate qualification criteria depending on the complexity of the component and the assessment process.

Criteria defined within the Local Aviation Authority¹ regulation could apply. However, where the national criteria are less restrictive than the one described below, the applicant should not be eligible for an [EASA Part-145 C/S individual authorisation](#).

1.2.1. **Initial authorization procedure.**

- The maintenance organisation shall detail in its Maintenance Organisation Exposition the established prerequisites to be eligible as EASA Part-145 Component Certifying Staff [as per the](#) Minimum qualification criteria [detailed in the following paragraphs from §1.3.1 to § 1.3.4](#):

In addition, the maintenance organisation shall also explain in maintenance Organisation Exposition §3.4 (refer also to the “Foreign Part-145 approvals –MOE” UG.CAO.00024-XXX) the Assessment procedure for granting A/C CC/S authorization which shall at least specify:

- The person responsible for this process;
- when the assessment shall take place;
- the validation of qualification records;
- procedures for the initial assessment (i.e. methods, including actions to be taken when the assessment is not satisfactory);
- recording of assessment results;
- The management of the C/S List and individual authorizations;
- The C/S records (responsibility, content of the (C/S) files, etc,...).

[Further guidance on the assessment of the CC/S is addressed in the paragraph §1.4.](#)

¹ Local Aviation Authority: means the aviation authority of the country where the maintenance organisation has its principal place of business.





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1.2.2. Authorization renewal process.

The maintenance organisation shall detail in its MOE the CC/S authorization renewal prerequisites such as but not limited to:

- The continuation training requirements (maintenance organisation procedures, new technology, human factor issues);
- The maintenance experience requirements (6 months of relevant experience in the last 2 year period) and the associated records of evidence;
- The assessment procedure for renewing the CC/S authorization which shall at least specify:
 - The persons responsible for this process;
 - when the assessment shall take place;
 - the validation of qualification records;
 - means and methods for the continuous control of competence;
 - actions to be taken when assessment is not satisfactory;
 - recording of assessment results;
- The management of the CC/S List and individual CC/S authorizations;
- The CC/S records (responsibility, record of experience, content of the CC/S files).

1.3. Component certifying staff qualification criteria.

1.3.1. Basic requirements.

1.3.1.1. Educational Requirements.

The minimum educational level shall be a school level or apprenticeship evidenced by the appropriate certificates.

1.3.1.2. Basic training requirements.

The CC/S shall be able to demonstrate he/she received a basic training on the appropriate field:

- an aeronautical school diploma or certificate or;
- a technical school diploma / certificate, if the intended scope of work concerns noncomplex electrical components or instruments and cabin and safety equipment or;
- an aeronautical military school diploma or certificate.

Depending on the complexity of the intended scope of authorization, a higher level of the basic training shall be considered.

1.3.1.3. Aeronautical experience requirements.

The CC/S shall be able to demonstrate at least:

- 2 years of Aeronautical experience in the field of aviation maintenance including at least 12 months of practical experience in the specific component maintenance area / Workshop;
- 3 years in the field of aviation maintenance for complex components such as engine/APU and Landing gears including 24 Months of practical experience in the specific component maintenance area / Workshop;





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1.3.2. *Technical training requirements.*

1.3.2.1. *Component training.*

Depending on the complexity and the technology of the component, the CC/S shall be able to demonstrate he/she received appropriate² theoretical and practical component training from:

- the OEM or;
- the OEM recognized training organization or;
- An appropriately rated maintenance organisation provided:
 - the person nominated to carry out the training can demonstrate he/she has received training to an appropriate level for the subject component;
 - the person nominated to carry out the training is appropriately authorized by the maintenance organisation and is able to demonstrate a significant experience on the relevant component maintenance;
 - the training syllabus has been reviewed by the Engineering Manager and/or the Quality Manager;
 - the component is available for practical training purpose;

For simple component, the maintenance organisation may take credit of the CC/S experience and/or a previous training on a component from the same family and same technology.

1.3.2.2. *Bench test training.*

Where there is a need to use Bench test (e.g. engine or ATEC bench test), the CC/S shall be able to demonstrate he/she received appropriate training. This training for the use of specific tools required by the OEM maintenance data shall be received from:

- The OEM or;
- The bench test manufacturer or;
- An appropriately rated maintenance organisation.

1.3.2.3. *Specific equipment training.*

Where there is a need to use specific equipment, the CC/S shall be able to demonstrate he/she received the appropriate training. This training for the use of specific tools required by the OEM maintenance data shall be received from:

- The OEM or;
- The specific tool manufacturer or;
- An appropriately rated maintenance organisation.

1.3.2.4. *Additional training.*

The C/S shall be able to demonstrate he/she received, as appropriate, training on:

- Initial Human Factor training According to 145.A.30(e) and GM 1 145.A.30 (e) syllabus³;
- MOE and internal procedures applicable to CC/S (including issuance of EASA form 1).

In addition, where needed, the CC/S shall demonstrate he/she received appropriate training on:

- Fuel Tank Safety items, CDCCL level 1, or level 2 after 31/12/2010, (refer to Appendix IV to AMC to 145.A.30(e) and 145.B.10(3) for further details);

² “appropriate training” means that the training level/detail is proportional to the maintenance level granted to the concerned certifying staff as identified in his/her certification authorisation.

³ Having completed a Module 9 HF training does not supersede the need to comply with the initial HF training in accordance with 145.A.30- (e). However, -credit may be taken from the module 9 Human Factor training for the topics which are common in both trainings, provided the Module 9 HF training has been completed within the previous two years.





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- Electrical Wiring Interconnection System (refer to AMC 20-22 for further details);
- Any additional training(s) justified during the assessment performed by the maintenance organisation (e.g. human factor, aviation legislation, etc..).

1.3.3. General requirements.

1.3.3.1. Language knowledge.

The CC/S shall be able to demonstrate a working knowledge of the language in which the maintenance data is published AND English.

1.3.3.2. Human factor and aviation legislation training.

The CC/S shall be able to demonstrate he/she received a training on:

- human factors referred to in module 9 of Appendix I to Annex III (EASA Part-66). The maintenance organisation shall ensure and be in a position to demonstrate that the Human factor training syllabus and the training level are compliant to the syllabus and the level (B1/B2) of training of Appendix I to Annex III (EASA Part-66). The demonstration process is left to the discretion of the maintenance organisation;
- a training on aviation legislation referred to in module 10 of Appendix I to Annex III (EASA Part-66):
The maintenance organisation shall ensure and be in a position to demonstrate that the aviation legislation training syllabus and the training level are compliant to the syllabus and the level (B1/B2) of training of Appendix I to Annex III (EASA Part-66). The demonstration process is left to the discretion of the maintenance organisation.

A proposed A/C Certifying staff (C/S) or support staff (S/S) is considered compliant with the above requirements without further need of investigation, if one of the following evidences is available:

- examination certificate of recognition (CoR) issued by an EASA Part-147 AMTO for the relevant module 9 or 10, or;
- when only a statement issued by an EASA Part-147 AMTO can be provided, stating that the person has attended the relevant module 9 or 10 according to the corresponding EASA Part-66 syllabus, then the maintenance organisation shall also ensure that that the course is carried out according to a detailed syllabus including level of training as per EASA Part-66 Module 9 and/or 10 as applicable (the duration of the course need to be specified to demonstrate the adequacy to cover all subjects).

When selecting a non-EASA Part-147 AMTO to provide the Human Factor training and/or Aviation Legislation, the maintenance organisation quality department shall be in a position to demonstrate as a minimum that:

- the course is carried out according to a detailed syllabus including level of training as per EASA Part-66 Module 9 and/or 10 as applicable (the duration of the course need to be specified to demonstrate the adequacy to cover all subjects);
- the Qualification criteria for instructors is defined;
- a maximum number of training Hours per day is defined (HF principal to be considered);
- a maximum of trainees per group of trainees (28 person).





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1.3.4. Recent maintenance experience

The maintenance organisation shall ensure that CC/S can demonstrate recent experience on the Component area/ workshop relevant to the component type intended to be authorised.

The recent maintenance experience shall be understood as meeting the requirement of 6 month of experience in two years period preceding the intended date of issuance of the certification authorization. Further guidance is provided in "Foreign Part-145 approvals – demonstration of 6/24 months maintenance experience UG.CAO.00128-XXX

1.3.5. Additional criteria for the renewal of individual authorization

The CC/S shall receive continuation training that covers Technical Development including Human Factors, FTS, EWIS and Aviation Regulation as applicable to the approval ratings and scope of work.

The CC/S shall demonstrate 6 months of experience during the two year period preceding the renewal of authorisation. Further guidance is provided in "Foreign Part-145 approvals – demonstration of 6/24 months maintenance experience UG.CAO.00128-XXX.

1.4. Assessment.

The aim of the assessment is to ensure compliance of the Component Certifying Staff with the relevant EASA Part 145 requirements, with the criteria defined in this user guide and to ensure that each CC/S possesses the expected competence(s) associated to his/her job function (proposed scope of work and level of maintenance⁴), before granting him/her an initial EASA Part-145 C/S individual authorisation, to renew or to extend the scope of his/her issued authorisation. This assessment shall also take into consideration attitude and behaviour

As a consequence the maintenance organisation shall demonstrate through a competence assessment that the CC/S:

- Meets the qualification criteria addressed above;
- Has the relevant knowledge, skills and ability to perform the maintenance tasks related to his/her job function including the relevant language knowledge;
- Is able to determine when the Component is ready to release to service and when it shall not be release to service.

In the case of initial authorisation or extension of the scope of an already existing authorisation, the competence assessment must:

- Be specifically tailored to the component type (s) intended to be covered by the certifying staff authorization;
- The competence assessment shall include evaluation of "On the Job Performance" and /or "testing of knowledge" by appropriately qualified personnel;
- In addition, it is recommended that the assessment form contains an open text field where the person responsible for the assessment records the questions raised, comments or any other information useful to support the recommendation for the pass/fail result. A "box-ticking" exercise would be pointless.

The qualification criteria addressed above are summarized in chapter "Summary table for EASA PART-145 Component C/S qualification criteria" of this user guide. The minimum topics to be assessed during the initial EASA

⁴ Level of maintenance means Overhaul, test, repair, Level 1, 2 and 3 for electronic / electric components as addressed in the CMM.





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Part-145 C/S individual authorisation process, the renewal or extension of his/her scope of authorisation are summarised in the table in chapter "Summary of assessment for component certifying staff" of this user guide.

1.5. Management of the CC/S list and individual authorization.

The management of the list of Certifying Staff and the management of the EASA Part-145 C/S individual authorisation shall be detailed within the exposition and approved by the competent authority.

The maintenance organisation is responsible to ensure that the CC/S remains current in terms of procedures, HF and technical knowledge. This continuation training should be of sufficient duration in each two year period, the maintenance organisation is strongly advised to align the validity of the CC/S authorisation accordingly.

1.6. Records.

The quality system shall review and archive in an exhaustive manner the relevant files resulting from the implementation of this procedure.

This means that the maintenance organisation shall keep records of all evidence associated to the CC/S authorisation. This means that certificates, experience log book, diploma, continuation training evidence, assessment evidence (including assessment results which could be in a form chosen by the maintenance organisation) shall be kept.





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1.7. Summary table for EASA PART-145 Component C/S qualification criteria

		Engine/APU/ Propeller	Hydraulic components (L/G assy, actuator, etc ..)	Electrical components (Motors, actuators, chargers, power supplies, batteries, etc..)	Electronic components (card assy, mike, head set, etc...)	Mechanical components (Wheel, Brake unit, structure,..)	Electronic Units (computers, com/nav receiver, indicators, power supplies,)	Instruments	Cabin Equipment (BFE, PSU, Pax Entertainment)	Safety equipment (Life raft, life jacket, O ² bottle, O ² masks,..)
Basic requirements	Educational level	Secondary school								
	Basic training	Aeronautical & technical school or Aeronautical military school or QA assessment								
	Aeronautical experience	2 years of Aeronautical experience in the field of aviation maintenance including at least 12 months of practical experience in the specific component maintenance area / workshop. For complex components such as engine/APU and Landing gears including, 3 years of Aeronautical experience is required in the field of aviation maintenance including 24 Months of practical experience in the specific component maintenance area / workshop.								
Technical training	Component training	OEM or OEM recognized Training Org. or EASA Part-145 AMO.								
	Bench test training	OEM of the bench test or EASA Part 145-AMO								
	Tool training	OEM or EASA Part-145 AMO								
	Additional training	<ul style="list-style-type: none"> Initial Human Factor training According to 145.A.30(e) and GM 1 145.A.30 (e) syllabus; MOE and internal procedures applicable to CC/S (including issuance of EASA form 1). <p>In addition, where needed, the CC/S shall demonstrate he/she received appropriate training on:</p> <ul style="list-style-type: none"> Fuel Tank Safety items, CDCCL level 1, or level 2 after 31/12/2010, (refer to Appendix IV to AMC to 145.A.30(e) and 145.B.10(3) for further details); Electrical Wiring Interconnection System (refer to AMC 20-22 for further details); Any additional training(s) justified during the assessment performed by the maintenance organisation (e.g. human factor, aviation legislation, etc..). 								
General training	Language knowledge	Working knowledge of the language in which the maintenance data is published AND working knowledge of English for the CRS (and for EU Airworthiness directives if required).								
	HF and Aviation legislation training	Human Factor and aviation Legislation training as detailed in the EASA Part- 66.								
	Recent Maintenance experience	6 month of experience in two years period preceding the intended date of issuance of the certification authorization								
Renewal criteria	Continuing training	OEM or OEM recognized Training Org. or EASA Part-145 AMO								
	Maintenance experience	6 months of relevant experience in the last 2 year period								

Note: The complexity and technology of the component shall be considered. For simple component, the maintenance organisation may take credit of the CC/S experience and/or a previous training on a component from the same family and same technology.





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1.8. Summary of assessment for component certifying staff.

Purpose of the Assessment <input type="checkbox"/> Initial grant <input type="checkbox"/> Extension <input type="checkbox"/> Renewal The competence assessment shall include evaluation of “On the Job Performance” and /or “testing of knowledge” by appropriately qualified personnel		
I QUALIFICATION		
I.1.	Refer to the Summary table (§1.7) for Foreign Part- 145 Component C/S qualification	X
II KNOWLEDGE		
II.1.	Knowledge of human factors, human performance and limitations	X
II.2.	Knowledge of maintenance organisation capabilities, privileges and limitations	X
II.3.	Knowledge of EASA Part-M, EASA Part-145 (and any other relevant regulations)	X
II.4.	Knowledge of relevant parts of the MOE and associated procedures	X
II.5.	Knowledge of safety risks linked to the working environment	X
II.6.	Knowledge on CDCCL (when relevant)	X
II.7.	Knowledge on EWIS (when relevant)	X
II.8.	Knowledge of occurrence reporting system and understanding of the importance of reporting occurrences, incorrect maintenance data and existing or potential defects	X
III UNDERSTANDING		
III.1.	Understanding of professional integrity, behavior and attitude towards safety	X
III.2.	Understanding of conditions for ensuring continuing airworthiness of aircraft and components	X
III.3.	Understanding of his/her own human performance and limitations	X
III.4.	Understanding of personnel authorisations and limitations	X
III.5.	Understanding critical task	X
IV ABILITY		
IV.1	Ability to supervise the performance of tasks carried out by non C/S personnel (i.e. mechanics, etc.)	X
IV.2	Ability to compile and control completed work cards	X
IV.3	Ability to consider human performance and limitations.	X
IV.4	Ability to determine required qualifications for task performance	X
IV.5	Ability to identify and rectify existing and potential unsafe conditions	X
IV.6	Ability to check and document proper accomplishment of maintenance tasks	X
IV.7	Ability to identify and properly plan performance of critical task	X
IV.8	Ability to prioritize tasks and report discrepancies	X
IV.9	Ability to process the work requested by the customer	X
IV.10	Ability to properly process removed, uninstalled and rejected parts	X
IV.11	Ability to properly record and sign for work accomplished	X
IV.12	Ability to determine the acceptability of parts to be installed prior to fitment	X
IV.13	Ability to understand work orders, work cards and refer to and use applicable maintenance data	X
IV.14	Ability to use information systems	X
IV.15	Ability to use, control and be familiar with required tooling and/or equipment	X
	Adequate communication and literacy skills: The Component certifying staff shall be able to demonstrate a working knowledge of the language in which the maintenance data is published. In addition, should the language of the maintenance data not be English, then English language working knowledge is required.	X
Note: This list shall not be considered as exhaustive. It remains the responsibility of the maintenance organisations to adjust it. It is recommended that the assessment form contains an open text field where the person responsible for the assessment records the questions raised, comments or any other information useful to support the recommendation for the pass/fail result.		

