

Organised by

Maintenance & Production Department, Flight Standards Directorate

List of Participants

Attendees	Ric PERI, Chair	AEA-E	Aircraft Electronics Association – Europe
	Simon Annetts	EIMG	European Independent Maintenance Group
	Marc Arendt	EAMTC	European Aviation Maintenance Training Committee
	Paulo Pestana	EBAA	European Business Aviation Association
	Arne Dedekind	ASD	AeroSpace and Defence Industries Association of Europe
	Kleomenis Bontiotis	IATP	International Airlines Technical Pool
	Miguel Vaz Pinto	ERA	ERA (European Regional Airlines Association)
	Koray Kudretoglou	IATP	International Airlines Technical Pool
	Per Lindqvist	IATA	International Air Transport Association
	Prosper Préau	ASD	AeroSpace and Defence Industries Association of Europe
	Fabrizio Fererra	EAMTC	European Aviation Maintenance Training Committee
	Jon Harris	AEI	Aircraft Engineers International
	Jorge Leite	A4E	Airlines for Europe
	Jeffrey Eagle	AIA	Aerospace Industries Association of America.Inc.
	Dominique Titre	A4E	Airlines for Europe
	Daniel Makinde	ASD	Aerospace and Defence industries Association of Europe
	Steve Szpunar	AIA	Aerospace Industries Association of America Inc.
	Kurt Dahlmann	ECOGAS	European Council of General Aviation Support
	Henrik Nipper	ETF	European Transport Workers Federation
	Cleomenis Bontiotis	IATP	International Airlines Technical Pool
	Mark Lynch	AWG	Aviation Working Group
	Malte Höltsken	IAOPA	International Aircraft Owners and Pilots Association
	Marcel Gisel	ECOGAS	European Council of General Aviation Support
	Marshall Filler	ARSA	Aeronautical Repair Station Association
	Ralf Erckmann	EASA	
	Eugenia Diaz Alcazar	EASA	
	Thaddee Sulocki	EASA	
	Luis Pires	EASA	
	Jeremie Neveux	EASA	
	Marianne Debrabandere	EASA	
Apologies	Niklas Larsson	IAOPA	International Aircraft Owners and Pilots Association
	Ulf Calsbach	EAS	Europe Air Sport
	Dragos Munteanud	IATA	International Air Transport Association
	Joe Sambiasi	GAMA	General Aviation Manufacturers Association
	Helmut Englmaier	ASD	Aerospace and Defence Industries Association of Europe
	Robert Alway	AEI	Aircraft Engineers International
	Mark Beauregard	AIAC	Aerospace Industries Association of Canada

	Liam Creaven Jean-Francois Deru Filippo di Silvestro Garry Huggins Armin Knobel Patrice Kurdjian Kyle Martin Mark Symonds	AWG A4E EAMTC ETF EHA ASD GAMA EIMG	Aviation Working Group Airlines for Europe European Aviation Maintenance Training Committee European Transport Workers Federation European Helicopter Association Aerospace and Defence industries Association of Europe General Aviation Manufacturers Association European Independent Maintenance Group

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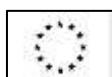
Attachments:

Attachment 1 - Agenda EM TEC 04.05.2021 Final
Attachment 2 - Minutes of the previous meeting
Attachment 3 - Update on current rulemaking activities – Eugenia Diaz
Attachment 4 - EU-US BASA MAG Change 8- Thaddee Sulocki
Attachment 5- Airworthiness review for aircraft undergoing maintenance or long -term storage- Per Lindqvist (IATA)
Attachment 6.1 - Cumulative effects of deferred rectifications- Prosper Préau (ASD)
Attachment 6.5 - Mobile Maintenance Services – Ric Peri and Prosper Préau (ASD)
Attachment 6.7 - 20210422_GA Part-145 Taskforce Presentation (EM.TEC) V-Marcel Gisel (ECOGAS)
Attachment 6.8 - #2020-2.2 - Documental and physical survey by different ARC team members - Follow-up P.Pestana
Attachment 6.9 - Part-CAMO - FAQ Proposals (v3 2021-04-26)- Paulo Pestana (EBAA)
Attachment 6.10 - 2021-04-28 Industry Position Prototype Parts at EMTEC_v4-Dominique Titré (A4E)

MoM Distribution:

To the participants, EM.TEC members and alternates.

MoM prepared by	Luis Pires	Date: 04/06/2021
MoM reviewed by	Eugenia Díaz Alcázar	Date: 07/07/2021



Minutes sent to the Chairman	Marianne Debrabandere	Date: 08/07/2021
MoM approved by	Ric Peri, Chair	Date: 16/07/2021

1- Welcome, Introduction

Presented by: Ric Peri, Eugenia Díaz Alcázar (EDIA) and Ralf Erckmann (RER)

Ric Peri, as chairperson of the meeting, welcomed the attendees to the 1st meeting of the year expressing his disappointment that due to CoVid-19 crisis is not a face to face meeting and hoping that the next meeting will be face to face.

RER welcomed the attendees on behalf of the Agency and addressed the attendees with the following points:

Brexit

- EU Parliament agreed on the EU – UK Trade Treaty making the separation of UK from EU official and bringing clarification to the relation EU – UK.
- An agreement with UK covering design and production has been signed. The implementation procedures are being drafted and close to be signed.
- No agreement or working arrangement in the other domains, including maintenance has been established yet. This means UK will have the same statute as any other third country.
- A high number of approvals in UK (around 500 from which approximately 240 are AMOs) are now under the responsibility of EASA.
- For the time being the decision to pursue an agreement also for maintenance is of more political nature.

Return to Normal Operation (RNO)

It is currently one of the most important topics and is transversal to all domains. EASA is under pressure to facilitate things and ensure a RNO as smooth as possible with a special focus on RNO related risks.

Remote audits

Collected feedback indicate that it works better in some areas than in others with regards efficiency and effectiveness. EASA will take on board the positive elements that the new methods bring to the system.

Digitalisation

EASA is looking at the internal workflow, processes, and procedures to make the transition towards digitalisation. Interactions with stakeholders and approved organisations are an important piece of this process. EASA is also interested in what industry is doing with regards digitalisation in terms of for example remote documents and certificates among other possibilities.

EASA is very interested in getting EM.TEC advice.

Ric Peri confirmed that the digital topic is highly pertinent as industry has been transitioning more and more to digital.

2- Adoption of the agenda, minutes of the previous meeting and review of open items of the action table

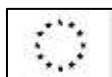
Presented by: Ric Peri

Attachment 2

The agenda (attachment 2) was adopted as proposed.

The minutes from the previous meeting held on December 2020 were adopted.

Ric Peri explained that at his request each open item was included as an agenda item to make sure that we stay cognisant of all open items and we move through them to its eventual closure.



3- Update on current rulemaking activities

Presented by: Eugenia Díaz Alcázar (EDIA), EASA

Attachment 3

EDIA informed that a presentation with an update on current rulemaking activities was shared for EM.TEC members review and pose their questions or comments to be clarified during the meeting. EDIA also informed about the adopted regulation amending Reg 1321/2014 linked on ICAs and Installation of parts without EASA Form 1 and confirmed that the new deadline for the transition to Part-CAO and Part-CAMO has been extended from September 2021 to March 2022.

Questions

Paulo Pestana (EBAA) raised a question on the expected date for the publication of AMC and GM material. EDIA confirmed that it has been sent for signature and should be a matter of weeks. **Paulo Pestana (EBAA)** also asked for the number of CAMO organisations under EASA responsibility. **RER** confirmed that EASA has currently 4 CAMO approvals under its responsibility where 2 are from third countries and the other two resulting from request from 2 EU operators. **RER** also confirmed that the transfer to EASA was smooth and is working well. **Paulo Pestana (EBAA)** stated that this could be a good option for EU operators.

Ric Peri made two comments. The first relates to slide 4 on the SMS for Part-145 and POA where there is an industry consensus tender for the implementation of SMS (SM-001) which is under review. Most of EM.TEC major organisations are participating on it and it will be open to other participants. The most challenging areas are scalability and maintenance. The second comment relates to the ASTM initiative that is looking at drone technician qualifications.

Following a question from **Paulo Pestana (EBAA)**, **EDIA** clarified some aspects of the new rule with regards to non-critical parts or parts with negligible safety impact to be installed on aircraft without an EASA form 1.

4- A briefing on the EASA/FAA MAG 8

Presented by: Thaddee Sulocki, EASA

Attachment 4

TSU provided a presentation on the latest developments with regards to MAG covering change 8 and highlighting the main changes to the Agreement.

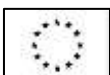
Questions

Marcel Gisel (ECOGAS) representative raised a question related to the inclusion, with the amendment of the Agreement, of Part-CAO approved organisations. **TSU** answered that so far there is no envisaged change in the pipeline to cover Part-CAO approved organisations. **Ric Peri** stated that it is something that EM.TEC would like to recommend even knowing that Part-CAO and Part-145 are not the same but have a similar structure and would be an important step particularly to small and medium enterprises. **Ric Peri** suggested to raise it at the next MMT meeting.

The possibility of extending the Agreement to independent certifying staff was also discussed.

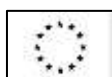
Action #2021 1.1

EU- US Agreement: Marcel Gisel (ECOGAS) to draft a document proposing the inclusion of Part-CAO approvals in the Agreement to be discussed at next MMT meeting.



5- Airworthiness review for aircraft undergoing maintenance or long term storage <i>Presented by: Per Lindqvist (IATA)</i> <i>Attachment 5</i>	
<p>Per Lindqvist (IATA) exposed the issue of issuing an ARC extension during extensive maintenance or long-term storage. IATA representative suggested that some definitions to be clarified namely what is considered long term storage and that if the aircraft follows the AMM storage procedures and storage maintenance guidelines it should be considered airworthy.</p> <p>Discussion:</p> <p>Paulo Pestana (EBAA) asked to clarify what the problem is as the aircraft has no operational activity. Per Lindqvist (IATA) clarified that the issue is about to quickly return the aircraft to operation.</p> <p>Malte Höltnen suggested that the issue is covered M.A.901(k) iv.</p> <p>Prosper Preau (ASD) underlined that storage and preservation procedures are not part of the aircraft maintenance programme in EU (from the legal point of view) therefore what happens during storage may not be under the control of the CAMO making it a difficult issue. It would be useful to have the position of the NCAs on this subject.</p> <p>EDIA stated that although further clarification could be beneficial it should be understood that there is the need to perform specific tasks to bring the aircraft operational again.</p> <p>Prosper Preau (ASD) explained that according some data provided by customer indicates that 80% of long term storage tasks are performed due to economic reasons whilst 20% are related to the airworthiness of aircraft. When bringing the aircraft from long term storage the figures are exactly the opposite: 80% related to the airworthiness of the aircraft and 20% for economic reasons.</p> <p>EDIA also underlined that the issue raised is about the extension of the ARC which is a much lighter process than issuing or renewing an ARC. EASA has been very active in supporting the additional extension of ARCs due to the CoViD-19 pandemic situation as well.</p> <p>Daniel Makinde (ASD) Underlined the different preservation tasks and timelines for the different aircraft main components like for example the engines.</p> <p>Ric Peri Summarised the discussion by raising two aspects: is this a systemic issue or is it only related to CoViD-19 pandemic situation, and long-term storage versus extended short term storage.</p> <p>Prosper Preau (ASD) suggested that this goes beyond CoVid-19 issue and needs the input from DM.TEC. Other participants concurred with Prosper Preau.</p> <p>EDIA asked clarification if the request for input from DM.TEC is related to long term storage only. Ric Peri explained that in his view the issue is related to the different airworthiness status of the aircraft under short-term storage or long-term storage.</p> <p>Prosper Preau (ASD) clarified that the issue is not about what it has to be done to bring the aircraft from short- or long-term storage but is mainly about to ensure that the aircraft was properly preserved.</p> <p>Main conclusions of the discussion can be summarised as follows:</p> <ul style="list-style-type: none"> - Clarification of what is long term storage could be beneficial. - There are required tasks to be performed to bring the aircraft operational again after storage and preservation. - Long-term storage versus extended short-term storage. - Systemic issue versus CoVid-19: it goes beyond CoVid-19; - Need input from DM.TEC 	
Action #2021 1.2	Aircraft under long term storage: Per Lindqvist to meet with Prosper Preau and the Boeing representative and to draft a short paper to be sent to DM.TEC explaining the situation and obtain its input if needed.

6- Review of Open Actions: 6.1- #2020 2.4 : Cumulative effect of defects <i>Presented by: Prosper Préau (ASD)</i> <i>Attachment 6.1</i>
<p>Prosper Préau (ASD) presented in detail the issue of cumulative effect of defects. He also reinstates a proposal made to EASA. The answer provided by EASA during the last EM.TEC was not what was expected to address this issue.</p>



Discussion:

EDIA explained that initially EASA had two actions to address this issue using safety promotion. The proposal presented relates to AMC material.

Ric Peri stated that for short term action safety promotion could be the right tool but for the long term action it was suggested to include the wording from the presented proposal to be included in the next revision to the AMC.

EDIA explained that there is a process that needs to be followed to include something in an AMC.

Prosper Préau (ASD) referred to the rulemaking task for the regular update of regulation which could suit to the discussed proposal. **EDIA** agreed that this might be a good option.

Paulo Pestana (EBAA) also expressed the support of the proposal.

Ric Peri stated that from the technical perspective the cumulative effect of defects maybe it is outside of pilot's technical competency and might require input from maintenance. The question is then if the focus to solve this issue should be on dispatch function or is it a technical issue of release to service.

EDIA highlighted that this item reveals the importance of the link between the operator and the CAMO is essential. It can not be said that it is only an OPS issue. It is especially relevant because we talk about MEL. However, OPS would be a key actor on this issue.

Daniel Makinde (ASD) suggested that input from the design (Part-21 J). **Prosper Préau (ASD)** stated that for sure the CAMO has not information naturally the CAMO has to go back to the design. If the CAMO is in the possession of all elements, then there is a decision to be taken for the flight and the CAMO needs to discuss it with the Operator.

Main conclusions of the discussion can be summarised as follows:

- **There are two elements: one related to Airworthiness and another to OPS.**
- **Importance of the link between operator and CAMO.**
- **Prosper Préau (ASD) to draft a revised text of the proposal.**

Next step: Prosper Préau to propose a revised text of its initial proposal and send it to Ric to be circulated for comments.

6.2- #2018-1.1: White paper 'Maintenance Tracking Software'

Presented by: Ric Peri

Ric Peri acknowledged that this item has been open for some time now and proposed to close this action and re-opening it in the future if the needed. Following a general consensus the item was closed.

6.3- #2019-2.1: TOR Part 66/147 - EM.TEC to develop a consolidated document with the comments to EASA"

Presented by: Paulo Pestana (EBAA)

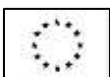
EDIA stated that this item should have been closed sometime ago. **Ric Peri** also confirmed that the deadline for the comments was July 2019.

The item is considered closed.

6.4- #2020-1.2: Status of the GA Part 145 Task Force: Ric and Dan to draft a clear statement of the problem before December 2020

Presented by: Ric Peri

The item was considered closed.



6.5- #2019-2-2: EM.TEC to develop a white paper on mobile maintenance services

Presented by: Ric Peri and Prosper Préau (ASD)

Attachment 6.5

Ric Peri delivered a presentation on this action which included the discussion outcomes of virtual meeting held on 24.03.2021 and a proposal to the EM.TEC to amend point 145.A.75(c) to rephrase “occasional **line** maintenance “ to “occasional maintenance” in order to be consistent with CAO.A.095(a)(3).

Discussion:

EDIA highlighted that EASA needs to know what the objective of the discussions is and secondly it has been agreed during last year discussions of this topic EM.TEC to check what would be the difference between approved and non-approved location which seems not to have been done.

Ric Peri asked if under Part-145 the understanding that maintenance is either done at base or at other than base where other than base is generally referred to as line maintenance. Line maintenance here should be understood not as operational concept but instead related to the location of where maintenance is taking place. If the AMO is rated and qualified to perform the maintenance, then it should be able to use that rating and qualification at the location of the aircraft and perform that maintenance away from base.

Daniel Makinde (ASD) gave the example of an unserviceable engine maintenance.

Prosper Préau (ASD) gave the example of a modification of a “serviceable” aircraft which brings the same difficulties as the example of repairing an engine as it needs to be done at the costumer’s place. Every time this happens, the AMO perform the audit and ensure all the conditions but still the AMO has to ask the permission to the NCA without any added safety value.

Marshall Filler (ARSA) mentioned the concept of continuous maintenance at a particular location versus mobile type maintenance. He also agreed with Prosper Préau with regards no added safety value to have to ask for authorisation to the NCA. The Part-145 AMO should have the ability to work away from the base as long it doesn’t set permanent shops in those places.

John Harris (AEI) raised the issue of lack of visibility of those places away from base or remote stations which means that will be excluded from NCAs surveillance activities. He agrees with the principle of performing line maintenance wherever is needed provided it is described in the MOE and it is visible so it can be audited by the NCA or by the contracting organisation.

Ric Peri stated that we were talking about working away from base station and he would expect that AMO’s QMS must address how to validate the critical elements and assure the same level of performance regardless of the location.

Paulo Pestana (EBAA) mentioned another dimension of the problem by referring to scheduled and non-scheduled maintenance.

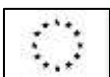
EDIA commented that it needs to be clear what EM.TEC wants to achieve, what the objectives are. It is expected that at a certain point EASA is provided with a clear indication of what are the EM.TEC conclusions on this subject.

Ric Peri agreed and indicated that the only thing missing from finalising the paper is the result of checking the history of how occasional line maintenance has been used in order to help to clarify if it refers to the location or to the type of maintenance performed. It is expected to be finished before the next meeting.

Niklas Larsson (IAOPA) provided the example of an operator of 206 Cessna mainly on straight floats where the problem of working away from the base maintenance is an important issue as those aircraft are not capable to come to the base maintenance location.

Main conclusions of the discussion can be summarised as follows:

- **Clarification if line maintenance is related to the location or if is of operational nature.**
- **No added safety value with the actual process in place of asking authorisation to the NCAs to perform maintenance locations not listed in the approval.**
- **Its is the responsibility of AMO’s QMS to ensure that all critical elements are validated to ensure the same level of performance regardless the location.**
- **EASA needs to be provided with a clear indication of what EM.TEC conclusions are.**
- **The paper on this subject expected to be finalised before the next meeting.**



6.6- #2019-4.2: Position paper regarding component certifying staff Robert Alway and other volunteers to develop a paper on EU Repairman concept.

Presented by: Ric Peri

Arne Dedekind (ASD) explained that the position paper on component certifying staff has been drafted and endorsed, waiting for EASA feedback, and thus that part of the action is considered closed for EM.TEC.

EDIA explained that it was understood that the current word in the regulation opens the component certifying staff licensing to national system which creates a level playing field issue in EU. If the EM.TEC is willing to have at EU level a license for component certifying staff, then EASA needs to know in advance.

Arne Dedekind (ASD) further explained that the conclusion from the survey in the past was clear: 80% of the respondents don't want a license for component certifying staff. However, EM.TEC is open to further discussions on the issue and believes the level playing field is re-established when the companies can choose from the national license or from their own qualification process.

Prosper Préau (ASD) stated that the position paper regarding component certifying staff that has been already endorsed and waiting to be processed by the system does not prevent Arne and Robert from working on the EU Repairman concept.

Ric Peri proposed to close this task and open a new action with regards to the development of a paper on EU Repairman concept taked to Robert Alway. This proposal was accepted.

Action #2019-4.2: Position paper regarding component certifying staff is closed.

Action #2021 1.3

Robert Alway and Paulo Pestana to develop and issue a concept paper on EU Repairman concept.

6.7- #2020- 2-1 Status of GA Part 145 Task Force Ric Peri to get together with Marcel and Dan offline and parcel the issues presented under this item before the next meeting

Presented by: Ric Peri and Marcel Gisel (ECOGAS)

Attachment 6.7

Marcel Gisel (ECOGAS) delivered a presentation about the status of main issues with regards GA Part-145 task force using as starting point the following conclusions from the last EM.TEC:

- B2L was developed to specifically address the issue of B2 manpower resources for GA.
- B2L is not a light B2 but instead a progressive B2.
- There are disparities between regulation Part-145 and Part-66 with regards age requirements.
- One of type training courses approval are proposed to be mutual recognised under NPA to RMT.0255.

Discussion:

Ric Peri explained the reasons supporting the creation of B2L license. The only differentiation between B2 and B2L is module 13.

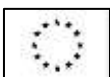
Paulo Pestana (EBAA) raised again the issue of system competences versus type certification.

Marcel Gisel (ECOGAS) underlined that systems are becoming more complex than the aircraft or major components.

The issue of certifying staff age requirement difference between regulations was discussed and was confirmed by **EDIA** that the limit for CAO organisations is 18 years old.

With regards to solve the problem with B2 for GA **Ric Peri** suggested to review the existing Part-66 AMC specifically for type ratings and AMC to 145.A.56 for B2 and confirm if the problem has been already solved.

Paulo Pestana (EBAA) raised the question directly to EASA about bringing Part-66 to a more performance-based set of rules. **RER** answered by saying that we have to manage expectations: EASA is confronted with requests to be more precise and prescriptive to bring clarity in the rules, whilst at the same time other group of people is asking for objectives and performance based rules. The best solution is something in between: we must have clarity in the rule, and it has to be enforceable, but we have to be mindful to provide enough flexibility. We



cannot take an existing rule and transform it into a performance-based rule. There is no initiative to translate into something completely different. It is based on continuous improvement process.

Paulo Pestana (EBAA) mentioned the implementation of SMS in Part-145 as a good opportunity to discuss the aspects mentioned during the discussion.

Marc Arendt (EAMTC) mentioned that ICAO is working on performance-based training guidelines.

6.8- #2020-2.2: Documental and physical survey by different ARC team members. Remote inspections: Paulo Pestana (EBAA) and Prosper Préau (ASD) to follow-up on this item.

Presented by: Paulo Pestana (EBAA) and Presper Préau (ASD)

Attachment 6.8

Paulo Pestana (EBAA) presented the follow-up status on this issue including a proposed amendment on NPA 2015-17 and a list of the way forward options.

Discussion:

Ric Peri clarified that the options presented are endorsed by EM.TEC.

EDIA stated that this issue has been already identified by EASA and there is a rulemaking task. EASA do believe that the Airworthiness Review is a very important tool safety wise. It was also clarified that AltMoc cannot go against the regulation. Option C is a good point for discussion.

Next step: **Paulo and Prosper to work on a proposal that EM.TEC could agree on before moving forward.**

6.9- #2020-2.3: PART CAMO – FAQ: EM.TEC to feedback EASA the outcome of EM.TEC internal discussions with regards developing FAQs on the issues presented

Presented by: Paulo Pestana (EBAA)

Attachment 6.9

It was clarified by **Ric Peri** that the proposed FAQs are endorsed by EM.TEC although being developed by EBAA.

Paulo Pestana (EBAA) presented the proposed FAQ questions. Paulo clarified that the proposed answers include already feedback from the different sources including EASA.

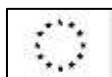
Discussion:

With regards FAQ 2 **Prosper Préau (ASD)** highlighted that there is no Part-M requirement with regards to aircraft configuration management thus in the cases where the aircraft have been subject to STCs non-mandatory SBs, even if coming from the TCH, need to be assessed in terms of compatibility with the existing configuration.

Paulo Pestana (EBAA) agreed with the comment and took it on board.

Ric Peri states that when you analyse an SB in isolation it is agreed that the TCH have done a safety assessment of that modification but it is up to the CAMO to take into consideration the cumulative effect of the different SBs implemented in the aircraft and thus perform a safety risk assessment as needed.

Next step: **Paulo Pestana** to work on FAQ number2 to revise it and circulate it before submitting it to EASA and **Prosper Préau** to provide the link to the article in Aviation Safety.



6.10- #2020-2.5: Usage of Prototype Parts: Dominique Titre (A4E), Prosper Préau (ASD) and Arne Dedekind (ASD) to prepare a presentation on the usage of prototype EASA Form 1s for the next meeting.

Presented by: Prosper Préau (ASD), Arne Dedekind (ASD), Marshall Filler (ARSA) and Dominique Titre (A4E)

Attachment 6.10

Dominique Titre (A4E) delivered a presentation on behalf of the group about the issue of usage of prototype parts EASA Form 1 which also includes the following proposal:

“EASA is requested to establish foundation for alternative procedures and initiate adjustment of the regulation or AMC (e.g. AMC to 21.A.307 and AMC to 145.A.42 with support EM.TEC)”

Discussion:

Arne Dedekind (ASD) expressed his view by saying that the re-certification of the EASA Form 1 assessment is not a safety issue.

Marshall Filler (ARSA) stated that the responsibility is always of the installer no matter how good is the EASA Form 1. There is no reason that the AMO cannot perform what is described in the presentation.

Arne Dedekind (ASD) indicated that in addition the comparison as Dominique has presented will be part of the record files.

EDIA stated that EASA is aware of the discussions and will wait for EM.TEC conclusions on the subject.

Next step: Dominique Titre to develop a proposal in AMC format to be submitted to EASA for evaluation

7- Presentation of Part-MG to Part-CAMO transition update

Presented by: Eugenia Diaz Alcazar (EDIA) - EASA

EDIA presented this issue as follows:

% of CAMO's already approved as Part-CAMO

- EASA don't have the numbers as they are kept with each MS. We know the total figures of Part Subpart-G and CAMO.
- The extra 6 months to transfer to Part-CAMO was well received

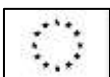
Main challenges

- For AOC holders some difficulties to have the same safety manager in the CAMO related to qualifications.
- Timeline which has been addressed at least partially by the extension of the transition period.
- Tendency, especially in small organisations, to copy and paste the CAME Safety Management system procedures leading to what can be called “empty CAMEs”. This is not the intention as the organisation needs to take advantage of SMS principles. NCAs are doing their best to avoid this situation.
- Tendency for small CAMO to implement complex systems.

Confirmation of 24 Sep 2021 as the deadline for approval

The deadline has been postponed to March 2022.

EDIA suggested that during next meeting EM.TEC provided an overview of the main challenges with regards the transition to CAMO.



8- AOB:

8.1- Dominique Titre (A4E) raised the question of the need for further guidance from EASA on Part-T especially with the consequences of Brexit creating some uncertainties.

EDIA stated that EASA needs to better understand the issue as EASA is not aware of any difficulties with Part-T. It was suggested to send an email to EASA with the details of the issue.

8.2- Ric Peri asked Ralf Erckmann if , by the next meeting a better understanding of the situation with regards Brexit and bilateral agreement would be.

RER answered that it is not in EASA hands and it is an issue of more political nature. How the relationship between EU and UK will develop, not only in aviation, it is completely open due to the political nature of the issue and EASA can only monitor the evolution of it.

It was agreed to keep a standing item with regards quick updating on this item for the next meetings.

Action #2021 1.4

Part-T further guidance from EASA: Dominique Titre to put the details together and send an email to EASA (EDIA)

9 - Closing

Ric Peri thanked everybody for the productive meeting and closed the meeting.

Annex : List of Actions

