



Terms of Reference

for rulemaking task RMT.0734

One continuing airworthiness management organisation for airline business groups

ISSUE 1

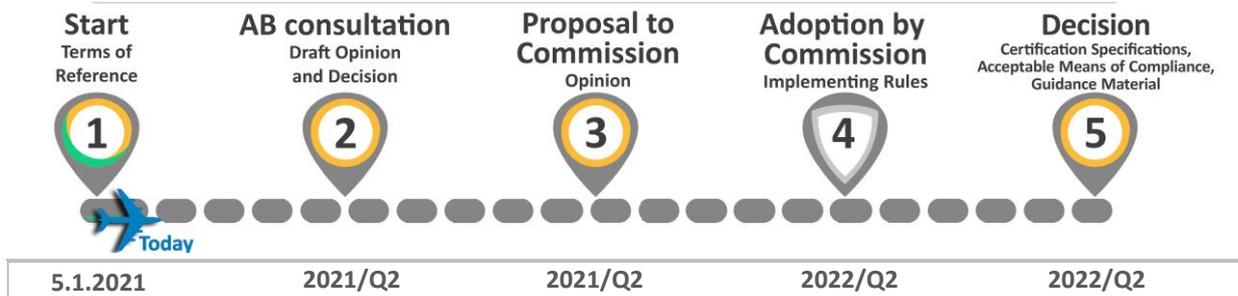
Issue/rationale

Rulemaking Task (RMT) 0734 addresses the barriers and inefficiencies that Commission Regulation (EU) No 1321/2014 creates for European Union (EU) airline business groups as regards the management of the continuing airworthiness of their fleets.

Its objective is to allow operators that form part of a single airline business group to have a single continuing airworthiness management organisation (CAMO) that manages the continuing airworthiness of all aircraft operated by the different air operator certificate (AOC) holders in a particular airline business group.

Action area:	Maintenance and management of continuing airworthiness		
Related rules:	Commission Regulation (EU) No 1321/2014		
Affected stakeholders:	CAMOs; airline business group operators; competent authorities (CAs)		
Driver:	Efficiency/proportionality	Rulemaking group:	No
Impact assessment:	Yes	Rulemaking Procedure:	Direct publication

EASA special rulemaking procedure milestones



1. Why we need to amend the rules — issue/rationale

Today, when there are several air operators that form part of a single airline business group, each AOC holder within a given group needs to have its own CAMO approved as part of the AOC for the aircraft it operates¹.

This requirement creates certain barriers to the establishment and implementation of a common continuing airworthiness management system for all aircraft that belong to the same group (e.g. duplicate processes and manuals), and to the enhancement of the interoperability of aircraft between AOC holders that belong to the same airline business group. These barriers are more significant nowadays due to the evolution of the business model of the EU airlines into business groups. As a consequence of these barriers created by Commission Regulation (EU) No 1321/2014, complex operational arrangements between the various CAMOs that report to a single executive board are established, which often include extensive subcontracting of continuing airworthiness tasks to each other's CAMOs in the group.

In addition, each CAMO might potentially have different competent authorities depending on their principal place of business, which increases the potential for different interpretations or the common understanding of the standardised processes within a business group.

Moreover, the current situation is considered by some air operators to be a competitive disadvantage compared to other non-EU air operators, which are not subject to such legal constraints and with more integrated operating and continuing airworthiness management processes — for instance, in other aviation markets such as in the USA, Asia or the Middle East.

Due to these reasons and to the need to improve the efficiency and the level playing field of the regulatory system for the management of the continuing airworthiness for EU airline business groups, considering also the COVID-19 pandemic, the topic is prioritised.

2. What we want to achieve — objective

The overall objective of the proposed rulemaking activity is to improve the efficiency and the level playing field of the regulatory system as regards the management of the continuing airworthiness of airline business groups within the EU.

The specific objective is to avoid duplications and foster the (international) competitiveness of CAMO activities in single airline business groups, including enhancing the interoperability of aircraft between the different AOC holders of such airline business groups.

3. How we want to achieve it

During the development of the draft rules, the following activities will be considered:

- review of the currently applicable requirements;
- identification of the barriers to increased efficiency and to fostering the (international) competitiveness of CAMO activities in single airline business groups;
- drafting of new requirements, including AMCs and GM, to remove the obstacles; and

¹ Requirement as per Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014R1321&qid=1608561186060>).

- review and consideration of the comments from the advisory bodies (ABs) before issuing the related EASA opinion and the subsequent EASA decision with the AMCs and GM.

4. What are the deliverables

- Draft opinion to be consulted with the ABs.
- Issue of the final opinion with the draft implementing acts.
- Issue of the related decision with the AMCs and GM.

5. How we consult

The consultation of the draft Opinion with the ABs shall be conducted per email.

6. Interface issues

EASA will support safety action MST.0019 '*Better understanding of operators' governance structure*' by providing guidance on how to effectively oversee group operations under the current Regulation. Although airline business groups are at the core of the two European Plan for Aviation Safety (EPAS) actions (namely MST.0019 and RMT.0734), there are essential differences in their scope and objectives. However, given their similarities, both tasks will be properly coordinated internally.

7. Reference documents

7.1. Affected regulations

- Commission Regulation (EU) No 1321/2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1)

7.2. Affected decisions

- Executive Director Decision 2015/029/R of 17 December 2015 issuing acceptable means of compliance and guidance material to Part-M, Part-145, Part-66, and Part-147 of Regulation (EU) No 1321/2014 and repealing Decision 2003/19/RM of the Executive Director of the Agency of 28 November 2003 ('AMC and GM to the Annexes to Regulation (EU) No 1321/2014 — Issue 2')