

Opinion No 13/2016

Technical records

RELATED NPA/CRD 2014-04 - RMT.0276 (MDM.076)

EXECUTIVE SUMMARY

Technical records are the means to assess the airworthiness status of an aircraft and its components. This Opinion addresses a safety issue linked with a wrong airworthiness assessment of the aircraft status due to incomplete technical records and is additionally related to a safety recommendation (SR) from the Air Accidents Investigation Branch (AAIB) (ref.: UNKG-2007-091), which recommends that the maintenance and overhaul records must be part of the logbook and retained until the aircraft/engine/propeller/component has been destroyed or permanently removed from service

This Opinion proposes to amend the existing requirements on technical records for assessing the airworthiness status of an aircraft, namely through:

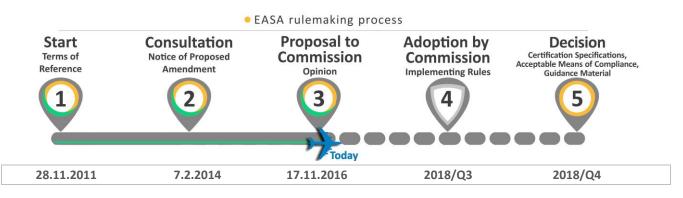
- a reorganisation of the related requirements in Regulation (EU) No 1321/2014;
- the provision of clearer requirements on components;
- the establishment of a consistent record-keeping period; and
- the introduction of various forms of record-keeping (e.g. digital) and commonly used information technology (IT) systems.

The proposed changes are expected to make requirements on technical records clearer, thus facilitating the understanding and implementation thereof; consequently, this will raise the current level of safety and enable a level playing field.

Furthermore, this will be beneficial to both industry and competent authorities (CA), promoting the cross-border transferability of aircraft between different regulatory systems.

Nevertheless, it should be noted that the general aviation (GA) community opposed the amendments initially proposed by the related NPA 2014-04. As a result, this Opinion does not propose any amendments to the forthcoming Part-ML.

Action area	Airlines	
Affected rules	Regulation (EU) No 1321/2014; ED Decision 2 ED Decision 2014/016/R; ED Decision 2014/0	2015/029/R; ED Decision 2014/015/R; ED Decision 2013/021/R; D18/R
Affected stakeholders	Air operators; aircraft owners; continuing-air organisations; CAs	rworthiness management organisations (CAMOs); maintenance
Driver	1 / 6	International Civil Aviation Organization (ICAO) Annex 6, Part I, Chapter 8, Section 8.4 and Part II, Chapter 6, Section 6.4
Rulemaking group	Yes Impact assessment Light	Procedure Standard





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1. **Procedural information**

1.1. The rule development procedure

The European Aviation Safety Agency (EASA) developed this Opinion in line with Regulation (EC) No 216/2008¹ (EASA Basic Regulation) and the Rulemaking Procedure².

This rulemaking activity is included in the EASA 5-year Rulemaking Programme under RMT.0276. The scope and timescales of the task were defined in the related ToR.

The draft text of this Opinion has been developed by EASA based on the input of RMG RMT.0276 (MDM.076). All interested parties were consulted through NPA 2014-04. 350 comments were received from interested parties, including aircraft owners, operators, flying-sports clubs/associations, maintenance organisations, CAMOs, manufacturers, CAs and individuals.

A summary of those comments and the EASA responses thereto are contained in Section 2.3 of this Opinion.

The final text of this Opinion (i.e. Explanatory Note and draft regulation(s)) has been developed by EASA based on the input of RG RMT.0276 (MDM.076).

The process map on the title page summaries the major milestones of this rulemaking activity.

1.2. The structure of this Opinion and related documents

Chapter 1 of this Opinion contains the procedural information related to this task. Chapter 2 'Explanatory note' explains the core technical content and summarises the RIA. The draft rule text proposed by EASA is published on the EASA website³.

1.3. The next steps in the procedure

This Opinion contains proposed amendments to Regulation (EU) No 1321/2014⁴ (CAW Regulation⁵) and is submitted to the European Commission to be used as a technical basis in order to prepare a legislative proposal.

EASA publishes the draft AMC/GM in Comment-Response Document (CRD) 2014-04⁶ concurrently with this Opinion. The ED Decision, to which the related AMC/GM will be annexed, will be published by EASA once the European Commission has adopted the related Regulation.

http://easa.europa.eu/document-library/comment-response-documents



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Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1).

EASA is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 18-2015 of 15 December 2015 replacing Decision 01/2012 concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material.

³ http://easa.europa.eu/document-library/opinions

⁴ 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).

⁵ Continuing-Airworthiness Regulation. 6

2. Explanatory note

2.1. Issues to be addressed

This rulemaking task (RMT) was initiated through a proposal made by the industry and the Member States (MSs) with a view to reducing the safety risk linked with a wrong airworthiness status of the aircraft and its components due to incomplete technical records. Although the CAW Regulation contains specific requirements in this regard, EASA inferred from the feedback received that those requirements are not clear enough in respect of which parts and/or components of the aircraft should be retained and for how long.

In 2012, EASA created RMG RMT.0276 (MDM.076) with the participation of experienced members from industry and CAs, whose task was to develop NPA 2014-04.

EASA received 350 comments on the above-mentioned NPA and established RG RMT.0276 (MDM.076) to review those comments.

Through the discussions during the RG meetings and the assessment of the comments on NPA 2014-04 some concerns already expressed when drafting the NPA have been addressed, especially with regard to:

- the inconsistency of the use of terms 'life-limited parts' and 'service-life-limited parts';
- the inconsistency of the record-keeping period; and
- the introduction/clarification of other forms of record-keeping and information technology (IT) systems.

2.2. Objectives

The overall objectives of the EASA system are defined in Article 2 of the Basic Regulation. This Opinion will contribute to the achievement of the overall objectives by addressing the issues outlined in Section 2.4 below.

The specific objective of this proposal is, therefore, to provide clearer requirements and guidance on those aspects creating interpretation problems, as well as to assess from a safety perspective some inconsistencies in the CAW Regulation and the related AMC/GM.

2.3. Outcome of the consultation

350 comments were received during the public consultation of NPA 2014-04 from 49 commenters, 31 of which are various stakeholders (maintenance organisations, CAMOs, associations etc.), 9 CAs, and 9 individuals.

2.3.1 Summary of comments received on NPA 2014-04

General

A number of organisations supported the proposals of NPA 2014-04, namely:

- the clarification concerning the data that must be retained by the owner/CAMO;
- the reorganisation of M.A.305; and
- clearer requirements on components and new IT tools.



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However, the GA community expressed their general disagreement as to this proposal because, as outlined in the comments, it did not reflect the GA environment and, in addition, it increased the administrative burden.

Record-keeping period

- There was general support for:
 - the establishment of a consistent record-keeping period throughout the CAW regulation, including organisations approved in accordance with Subpart F of Part-M (Annex I to the CAW Regulation); and
 - a record-keeping period of 36 months instead of 24 months.
- Several commenters requested clarification of the meaning of certain terms used for defining time, e.g. 'until such time'.
- A concern was expressed regarding missing information when the maintenance organisation disposes of the records after the record-keeping period given the fact that the CAMO/owner does not need to keep the same records as the organisations performing maintenance.
- The Federal Aviation Administration (FAA) commented that the record-keeping periods are significantly longer than the ones in their system.

Life-limited parts (LLPs) and time-controlled components (TCCs)

- A number of comments were in support of these proposed terms and the requirements related to each one of them, but required further guidance on the definitions of those terms in order to avoid misunderstandings: e.g. regarding which records need to be kept in each case if a component, such as a universal joint or a power transfer unit, cannot be restored to a specific standard.
- It was commented that the burden of data segregation and retention would significantly increase if every component with a scheduled maintenance task were considered a TCC.
- A table was requested in order to make the requirements related to the above-mentioned terms as clear and simple as possible.
- Some commenters pointed to the direction of keeping all general records related to components in order to ensure traceability, and of considering as TCCs all the components other than the LLPs for which the maintenance schedule of the aircraft maintenance programme (AMP) requires periodically a replacement.

Detailed maintenance records

- The definition of 'detailed maintenance records' proposed was generally supported; some comments were made regarding the references to the specific records that could be part of the detailed maintenance records.
- A few commenters requested that the definition should be included in the guidance for the maintenance organisations.
- It was considered a burden for the maintenance organisations to extract information from the work package in order to provide it to the owner/CAMO.



- Some commenters requested that the CAMO should have the possibility to receive more information from the maintenance organisations in order to support the reliability programme.
- The term 'dirty fingerprints' was considered confusing and outdated.
- One commenter expressed the concern that a safety risk could arise if 'dirty fingerprint's are not kept because then the aircraft and component statuses would remain unchecked, especially during redeliveries.

GA community

- GA opposed the amendments proposed in NPA 2014-04 because, as they commented, the realities of the GA operations had not been sufficiently considered.
- Through a number of comments it was proposed to allow summary entries of the flights in the technical records.
- It was specifically commented that the new terms related to components should not be used, and that, instead, the current Regulation should remain unchanged in this regard.
- One commenter requested to introduce a record-keeping period for components fitted to ELA2 aircraft without an EASA Form 1, in accordance with 21.A.307(c).

Various topics

- The guidance on digitalised records and IT systems was generally supported with few comments requesting some minor amendments. In addition, it was proposed to review other requirements of the CAW Regulation to introduce the same guidance.
- Several commenters suggested to revisit the information regarding software in order to avoid missing the loaded software during shop visits of the components into which the software is loaded.
- Several commenters requested to include more clarification on terms such as 'status', 'permanently withdrawn from service' or 'applicable parameter'.
- The information about the airworthiness directive (AD) status was generally supported; however, some clarification was requested of the need to include superseded ADs in the technical records or of the meaning of 'interim assessment' when referring to an AD.
- Some comments were received on modification and repairs, as well as their statuses. It was proposed:
 - to keep records related to modification/repairs not only for components with an airworthiness limitation;
 - to receive more information in order to support the status, e.g. the master drawing list; and
 - to introduce an electronic-load analysis reference.
- Some organisations expressed their views covering a larger scope of components, for example:
 - components permanently transferred from one owner/operator to another, or
 - components not installed in an aircraft; or



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- components on the shelf.
- One commenter regretted that the radio frequency identification device (RFID) was excluded from the NPA.
- There was a comment proposing a minor amendment to the wording of the AMC to Part CAT,
 Part NCC and Part NCO, as well as the addition of GM to introduce that the operator should have a procedure described in the operations manual in order to define responsibilities.

2.3.2 Summary of the RG RMT.0276 discussion on the comments received on NPA 2014-04 and responses thereto

In order to develop this Opinion, the comments received during the NPA 2014-04 public consultation and summarised under Section 2.3.1 above were analysed and discussed in RG RMT.0276.

The following is a summary of the conclusions of the most relevant discussions and of the responses to the summarised comments.

Record-keeping period

- RG RMT.0276 finally agreed to maintain the 36-month period. The main reason was to retain the airworthiness review cycle.
- Nevertheless, EASA would like to point out that such cycle does not actually exist because the airworthiness review is not limited to the last three years of aircraft operation. As certain records are always kept, the airworthiness status of the aircraft should always be possible to assess. For example, if during the airworthiness review, an AD performed 10 years ago is chosen in the sample, the records demonstrating compliance with such AD shall be kept, regardless if the records of any consecutive repetitive ADs are kept for 24 or 36 months.
- The record-keeping period, when the aircraft is permanently withdrawn from service, reverted back to the current 12-month period because the proposed 24-month period, consistent with the rest of the proposed record-keeping periods, and in accordance with the Basic Regulation, was not considered to bring any safety benefit.
- Based on the comments, further guidance on certain terms in the relevant GM is requested, such as 'until such time'.
- As the records for establishing the airworthiness status of the aircraft and its components are sent to the owner/CAMO, the disposal of those records by the maintenance organisation is pointless since the relevant information is kept by the owner/CAMO. Nevertheless, this statement is valid only when the proper detailed maintenance records are actually transferred to the owner/CAMO.

LLPs and TCCs

- It was agreed that it is not the intent of the proposal to increase the burden on owners/CAMOs to keep more records than necessary for establishing the airworthiness status of the aircraft. This led to further clarification of the TCC definition.
- The initial TCC definition is amended to cover only components whose maintenance is performed in shop and driven by mandatory requirements in accordance with Part-21.



- Comments requesting to keep all the records for components or considering as TCCs all the components other than the LLPs mentioned in the AMP were not accepted because there is no safety benefit while the administrative burden is increased.
- When a component is affected by a maintenance task contained in the AMP, this task being driven by a recommendation of the design approval holder (DAH) and controlled at component level, although such component does not qualify as a TCC, the status of the component may be needed in order to show that all the maintenance due on the aircraft according to the AMP has been carried out. There is no specific requirement to keep the EASA Form 1 or equivalent document or any other detailed maintenance records.
- The comments requesting a table for clarifying the records of components have been accepted.

Detailed maintenance records

- After assessing the comments, the GM has been amended accordingly, namely:
 - the type of information relevant for future maintenance;
 - some additional information requested by the owner/CAMO to verify and demonstrate the effectiveness of the AMP; and
 - the confusing term 'dirty fingerprints', which has been deleted.
- The comments requesting to add this GM relating to maintenance organisations has been partially accepted. The regulation has been amended and the detailed maintenance records are now cross-referred.
- Regarding the potential administrative burden for the maintenance organisations to extract information from the work package in order to provide it to the owner/CAMO, nothing prevents those organisations from sending the complete work package if they prefer to do so. The guidance intends to clarify what type of information is needed to be retained by the owner/CAMO to fulfil their obligations as well as the difference of said records with those related to a maintenance action to be kept by the maintenance organisation.

GA community

- The CAW Regulation allows for summary entries of the flights and a record-keeping period for records connected to components fitted to ELA2 aircraft without an EASA Form 1, in accordance with 21.A.307(c), has been added.
- Based on the comments, the afore-mentioned amendment is only proposed for Part-M and will not affect the forthcoming Part-ML.

Various topics

— The status of the current modifications/repairs has been amended to provide more clarity of the information supporting the status. For example, the embodiment instructions and any continuing-airworthiness instructions related to a repair are part of the continuing-airworthiness records, but not the engineering judgment or any other calculation made by the DAH. The need to include an electronic-load analysis reference has been discussed, but such references are already considered as instructions for continued airworthiness.

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- Regarding the comment to keep records related to modifications and repairs not only for components with an airworthiness limitation, it is not accepted because the increased administrative burden is not justified from a safety perspective.
- Some other comments related to the AD status or to more clarification of 'current status', 'permanently withdrawn from service' or 'applicable parameter' are accepted, and the related AMC/GM are amended accordingly.
- The guidance on digitalised records and IT systems has been slightly amended. The introduction
 of similar guidance linked with other parts of the CAW Regulation is considered outside the
 scope of this RMT although it is agreed that it would be beneficial. A decision at a later stage
 could support this amendment.
- The comments on the software in order to avoid missing the software loaded during shop visits are accepted and the proposed term is replaced by 'loadable software aircraft part' (LSAP).
- The components addressed under this RMT are the ones installed in an aircraft so the comment regarding other components is not accepted because it is outside the scope of M.A.305.
- Regarding the commenter regretting that the RFID has been excluded from the NPA, it is reminded that this type of devices installed on the component cannot be used as the 'primary' source of records with the aim of preventing the loss of information in case of an accident.
- The comments on the amended AMC to Annex IV (Part CAT), Annex VI (Part NCC) and Annex VII (Part NCO) to Regulation (EU) No 965/2012⁷ (Air OPS Regulation⁸) and the new related GM are accepted but the operations manual is not the proper document to define the operator's responsibilities. The operators themselves should establish within their organisation responsibilities and procedures to retain and control the status of the operational equipment. Additionally, the AMC to Annex VII (Part SPO) to the Air OPS Regulation have been amended in accordance with the amendments to the AMC to the other Parts of the Air OPS Regulation.

2.4. Summary of the RIA

2.4.1 Safety impact

- The proposed amendment to the CAW Regulation is not anticipated to have any negative safety impact. On the contrary, it will provide more clarity to the requirements on technical records, thus facilitating the understanding and implementation thereof; consequently, this will raise the current level of safety.
- The introduction of the guidance on other forms of record-keeping different from the paper records will increase the level of safety because this guidance provides the features of the standard to be used.
- AAIB SR (ref.: UNKG-2007-091), which is addressed by this RMT, recommends that the maintenance and overhaul records must be part of the logbook and retained until the

Air Operations Regulation.



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 ⁷ Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1).
 ⁸ Air Operations Regulation

aircraft/engine/propeller/component has been destroyed or permanently removed from service. The following proposals contained in this Opinion are linked with this SR:

- Normally, not all the maintenance records need to be kept by the owner/CAMO to establish the airworthiness status of the aircraft and determine future maintenance tasks. This is clarified in the added GM on detailed maintenance records.
- Certain records, i.e. the ones showing compliance with an AD performed by the maintenance organisation, will be kept until the aircraft has been removed from service.

2.4.2 Environmental impact

No environmental impact is expected.

2.4.3 Social and economic impact

The proposed changes do not affect the privileges of the organisations that manage the continuing airworthiness of an aircraft and its components, nor the qualification requirements for the staff working for these organisations.

The administrative burden of record segregation and record-keeping has been kept as light as possible through the:

- assessment of the minimum records for establishing the airworthiness status of the aircraft and its components; and
- guidance on other forms of record-keeping, i.e. electronic documents.

2.4.4 GA and proportionality issues

To ensure proportionate rules, this proposal includes summary flights as well as the records that need to be kept for components installed without a Part-21 EASA Form 1 for ELA2 aircraft.

Based on the comments on NPA 2014-04, the aforementioned amendment is, for the time being, only proposed for Part-M and will not affect the forthcoming Part-ML.

2.4.5 Impact on 'better regulation' and harmonisation

The proposed changes:

- take the opportunity to simplify the existing rules and introduce a 'smart regulation' in line with EU requirements;
- establish a longer record-keeping period than the one defined by ICAO; and
- do not affect existing bilateral agreements although it is noted that FAA record-keeping periods are shorter than those of the current CAW Regulation and the proposed ones by this Opinion.

2.4.6 Conclusion

This Opinion reduces the safety risk linked with a wrong airworthiness assessment of the status of the aircraft and its components due to incomplete technical records. It provides clearer and proportionate requirements and guidance on those aspects creating interpretation problems and assesses some inconsistencies from a safety perspective. The proposed rules are expected to have a marginal economic impact and a positive impact in terms of 'better regulation' as they simplify the existing rules and introduce a 'smart regulation' in line with European Union (EU) requirements.

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2.5. Overview of the proposed amendments

The principal amendments to the CAW Regulation proposed in this Opinion, as well as to the associated AMC/GM presented in CRD 2014-04, are the following:

- reorganisation of M.A.305;
- introduction of new concepts related to components;
- introduction of a consistent record-keeping period;
- clarification of existing requirements on technical records related to continuing airworthiness and maintenance;
- provision of guidance on IT systems and different forms of records, i.e. electronic documents, and
- additionally, amendments to AMC/GM to various parts of the Air OPS Regulation.

(a) Reorganisation of M.A.305

In comparison with the current CAW Regulation, this Opinion proposes the following:

- The current M.A.305(b) and (d) read 'records shall consist of' and 'records shall contain', respectively, without specifying what the rest of the requirements in M.A.305 refer to, if not to records. This lack of clarity is eliminated by including a single point stating what records 'shall contain' and referring to the corresponding requirements.
- Furthermore, the requirements on records at aircraft level are mixed with those on records at component level. The proposal separates the two different categories of requirements.
- Given the lack of clarity with regard to what records should be kept when the aircraft is permanently withdrawn from service, the proposal segregates the requirements for aircraft permanently withdrawn from service.

(b) New concepts related to components

The maintenance schedule of the AMP may include tasks controlled at component level, some of them stemming from a continued-airworthiness requirement made mandatory by the Agency. Only some records related to these components are specifically requested to be kept in addition to the records at aircraft level.

When the mandatory Part-21 requirement is a life limitation, the component is classified as an LLP, and as a TCC for the rest of the cases if the maintenance is performed in shop. Each type of component has its own record-keeping requirements.

Definitions and examples are given in the AMC/GM, i.e. a table with a summary of the records requirements related to components subjected to a primary maintenance process.

Other components affected by a maintenance task based on a recommended instruction by the DAH may need to keep some records to show that all the maintenance due on the aircraft according to the AMP has been carried out, but there is no specific requirement to keep the related EASA Form 1 or equivalent or any other detailed maintenance records. The only

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exemption would be for any component whose records are the means to show compliance with any other requirement of the CAW Regulation, i.e. an AD.

(c) Consistent record-keeping period

The same time limit of 36 months has been introduced into Part-M and Part-145 (Annex II to the CAW Regulation). In M.A.305, this time limit defines the time when superseded and current information must be kept. After this period, only the current one must be kept until the aircraft is permanently withdrawn from service. For maintenance organisations, the period of 36 months is the required record keeping-time for records related to a maintenance action, after which those records can be disposed of.

The record-keeping period when the aircraft is permanently withdrawn from service has been segregated into various categories in order to avoid confusion with other requirements, and it has been kept at 12 months.

(d) Clarification of existing requirements related to continuing airworthiness and maintenance

Detailed maintenance records

'Detailed maintenance records' is a concept which already exists in the current CAW Regulation, although it creates some confusion. This proposal introduces guidance on what a detailed maintenance record is, why it is necessary and what the differences are between records to be kept by a maintenance organisation and an owner/CAMO. This guidance gives examples of what is considered as information relevant to future maintenance and/or as detailed maintenance records.

Statuses

Apart from providing a definition to the term 'current status', further guidance is introduced into several statuses, such as ADs or modifications and repairs. For example, the GM provides examples of what the status of modifications and repairs may include as embodiment instructions. The current AMC to M.A.305 are amended to delete any engineering judgment or any other calculation made by the DAH that are not part of the records. Additionally, the AD or modification/repair statuses should be clear enough to identify the loadable software aircraft parts.

(e) Guidance on IT systems and different forms of record-keeping

The guidance introduced explains what features an IT system should have for supporting the aircraft continuing-airworthiness records.

It is acknowledged that there are other forms of record-keeping than paper, e.g. electronic documents. The proposed guidance introduces other means, such as electronic data via an electronically approved (signed) form or scanned reproductions, and provides the minimum characteristics for those records to be acceptable.

(f) Amendments to AMC/GM to Part CAT, Part NCC, Part NCO and Part SPO

These amendments provide a means to comply with the requirement regarding the functionality of the components required for the intended operation that are not controlled in the context of the continuing-airworthiness management. Additionally, the operator should define



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responsibilities and procedures to retain and control the status of the above-mentioned components.

This Opinion does not propose any amendments to the forthcoming Part-ML.

Done at Cologne, 14 November 2016

[signed by] Patrick Ky Executive Director



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3. References

3.1. Affected regulations

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)

3.2. 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'
- Decision 2014/015/R of the Executive Director of the Agency of 24 April 2014 adopting Acceptable Means of Compliance and Guidance Material to Part-CAT of Regulation (EU) No 965/2012 and repealing Decision 2012/018/R of the Executive Director of the Agency of 24 October 2012 'AMC and GM to Part-CAT Issue 2'
- Decision 2013/021/Directorate R of the Executive Director of the Agency of 23 August 2013 on adopting Acceptable Means of Compliance and Guidance Material for Non-commercial operations with complex motor-powered aircraft (Part-NCC)
- Decision 2014/016/R of the Executive Director of the Agency of 24 April 2014 adopting Acceptable Means of Compliance and Guidance Material to Part-NCO of Regulation (EU) No 965/2012 and repealing Decision 2013/022/R of the Executive Director of the Agency of 23 August 2013 'AMC and GM to Part-NCO — Issue 2'
- Decision 2014/018/R of the Executive Director of the Agency of 24th April 2014 adopting Acceptable Means of Compliance and Guidance Material to Part-SPO of Regulation (EU) No 965/2012 'AMC and GM to Part-SPO'

3.3. Reference documents

ICAO Annex 6 to the Convention on International Civil Aviation 'Operation of Aircraft', Part I 'International Commercial Air Transport — Aeroplanes', Chapter 8 'Aeroplane maintenance', Section 8.4 'Maintenance records', and Part III 'International Commercial Air Transport — Helicopter', Chapter 6 'Helicopter maintenance', Section 6.4 'Maintenance records', 9th Edition, July 2010

