

## Part-145

### Part-145: General

#### Is Part-M applicable to approved Part-145 organisations?

##### Answer

Yes, in addition to the Part-M or Part-ML provisions directly referred to in Part-145 (such as reference to point M.A.304 or ML.A.304 in 145.A.48), certain other requirements laid down in Part-M or Part-ML should also be considered by these organisations. Guidance on this subject is given in 'GM Article 4(1)'.

##### Last updated:

28/01/2021

##### Link:

<https://www.easa.europa.eu/en/faq/19036>

#### What does the term 'occasional' mean in 145.A.75(c)?

##### Answer

Within the privilege described in 145.A.75(c) an aircraft maintenance organisation (AMO) may perform line maintenance activity (Part-145) in other-than-approved locations, provided it is considered as 'occasional'. There is no formal definition of 'occasional' in the regulation, AMC and GM, but this privilege should be used to support an operator with which the AMO is already in contractual relation, when this operator needs line maintenance service for a short period at a new location due to a **special occasion or particular reason** (e.g. one-time flights, short term contracts/flight destination, flight schedule changes, special event at a particular location such as European athletics championship in Berlin, 6-12 August 2018, etc.) or the owner needs supporting maintenance service for a short period at a new location due to a **special occasion or particular reason**.

Subject to the approval by the Competent Authority, the maintenance organisation should develop in the MOE (e.g. Chapter 2.24 Reference to Specific Maintenance Procedures) the generic procedures to be followed in such a case: how to assess whether the maintenance can

be performed, availability of tools/ equipment/ material/ components/ maintenance data, staff, adequacy of the facilities, environmental conditions, quality system, record keeping, need to report these cases to the competent authority, etc. In addition, the procedure should include the criteria (e.g. maximum service duration without gap in the continuity; limitation in the repetition of the need\* at one given location) to classify the activity as ‘occasional line maintenance’.

*\* In principle, the repetitive use of this privilege at the same location should not be considered, and for repetitive needs, an approved line station should normally be established at that location.*

#### **Last updated:**

02/02/2021

#### **Link:**

<https://www.easa.europa.eu/en/faq/21265>

## **How to easily update the “EASA Form 1 – MF/145 Issue 2” to “EASA Form 1 – MF/CAO/145 Issue 3”?**

### **Answer**

#### **Purpose of the FAQ**

This FAQ is intended to recommend the industry and national competent authority (NCA) an easy way to implement the ‘EASA Form 1 Issue 3’, applicable from 24.03.2020, by the Maintenance organisations.

#### **Description of the issue**

The Regulation (EU) 2019/1383 updated the Appendix II to Annex I (Part-M) — Authorised Release Certificate — EASA Form 1 by changing the footer of the form in order to add the reference of the Part-CAO.

Some organisations may still have in stock hardcopies of EASA Form 1 Issue 2.

In such case, due to the fact that there is no change in the content of the EASA Form 1 or/and in its completion methodology, for the Part-145 and Part-M, Subpart F approved organisations, the change can be done by:

- crossing out the footer in an ‘EASA Form 1 – MF/145 Issue 2’ and replacing it by ‘EASA Form 1 – MF/CAO/145 Issue 3’; or
- accompanying the Form 1 with a communication explaining that the footer should be read

as 'EASA Form 1 – MF/CAO/145 Issue 3' in accordance with the MOE/MOM procedure; or

- by other means acceptable to the NCA.

**Last updated:**

23/10/2020

**Link:**

<https://www.easa.europa.eu/en/faq/119322>

**How did you install a Commercial Off-The-Shelf (COTS) equipment without EASA form-1? How do you arrange Part-145 side actually?**

**Answer**

Please check for the answer published [here](#).

**Last updated:**

06/12/2021

**Link:**

<https://www.easa.europa.eu/en/faq/134264>

## **Quality system**

**Does the Part-145 or Part-CAO quality system need to be subject to monitoring?**

**Answer**

Yes, the quality system is part of the activities of the Part-145 organisation and therefore it should be monitored.

Point 145.A.65 (c) or CAO.A.100 (b) (1) requires that the quality system monitors that the activities are (being) performed in accordance with the approved procedures. The quality system procedures are included within these approved procedures. This implies that quality system must be subject to audits and the Part-145 or Part-CAO organisation audit programme/plan needs to reflect this.

Besides that, the audits of the quality system shall satisfy the requirement of independent audits. This is further explained in AMC 145.A.65(c)(1) point 11: the independence of the audits should be established by always ensuring that audits are carried out by personnel not responsible for the functions, procedures or products being checked. So, the quality manager

cannot audit the quality system in terms of independence of the audit. For Part-CAO this subject is explained in AMC1 CAO.A.100(b).

Therefore, to audit the quality system, it is acceptable to:

- use competent personnel from a different section/department in the same organisation not responsible for the quality function/procedure, or,
- contract the independent audit element of the quality system to another organisation or a qualified competent person.

The way the quality system is going to be audited has to be described in the MOE or CAE and approved by the competent authority.

**Last updated:**

28/01/2021

**Link:**

<https://www.easa.europa.eu/en/faq/19054>

## **Certification of maintenance**

**With respect to blend out repairs, is it required to record the depth and area dimensions of material removed during a blend out repair or is it sufficient to simply record that the damage has been repaired as per the SRM?**

**Answer**

Yes, the dimensions of the damage and the removed/remaining material should be recorded. This is a very important information in order to assess whether further damage (adjacent or at the same spot) at a later stage would be allowable or not. In addition, it is a safeguard measure in order to be able to determine, during audits, whether the person correctly determined that the damage was within limits.

**Last updated:**

15/12/2014

**Link:**

<https://www.easa.europa.eu/en/faq/19053>

**Can the subcontractor of a Part-145 or Part-CAO organisation release maintenance?**

## Answer

One of the fundamentals of subcontracting activities is that, during such maintenance, the Part-145 approval is extended to include the subcontractor activities. Subcontracting can be done only if the Part-145 has approved procedures to do it (145.A.75(b)) and the MOE is amended to reflect this new subcontractor.

A certificate of release to service can be issued by a person from the subcontractor who has received a certification authorisation from the Part-145 organisation in accordance with the certification authorisation procedure of the MOE including the assessment of competence.

The certificate of release to service and the EASA Form 1 will always be issued under the maintenance organisation approval reference.

For maintenance by Part-CAO the situation is different. Only 'specialised services' (e.g. NDT) can be subcontracted to another organisation, in accordance with the appropriate procedure set out in the CAE and approved by the competent authority (CAO.A.095(a)(2)). In accordance with AMC1 CAO.A.025 the procedure should be part of chapter B.7 'Subcontracting'.

A certificate of release to service can be issued by a person from the other organisation who has received a certification authorisation from the CAO in accordance with the certification authorisation procedure of the CAE.

The certificate of release to service will always be issued under the CAO approval reference.

### Last updated:

28/01/2021

### Link:

<https://www.easa.europa.eu/en/faq/19051>

## Release to service of NDT tasks by Part-145 or Part-CAO organisations

### Answer

This answer is separated in two tables. One table is for organisation holding a Part-145 approval and the second table is for organisations holding a Part-CAO approval.

#### Part-145:

| Part-145 organisation | Certifying staff required | Qualification system | General Release procedure | Release procedure for an NDT inspection |
|-----------------------|---------------------------|----------------------|---------------------------|-----------------------------------------|
| Aircraft              |                           |                      |                           | A Part-145                              |

|           |                                                                                                                                                                                                                             |                                                                 |                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| (class A) | <p>The release of the aircraft maintenance carried out under A class rating has to be performed by certifying staff holding a Part-66 licence. (B1 or B3 or C or L certifying staff under the organisation's A rating.)</p> | <p>Licencing of personnel has to follow Part-66 regulation.</p> | <p>The release is either on the aircraft technical log or issuing an aircraft release to service statement.</p> | <p>organisation holding an A approval rating on a particular aircraft type and having in its approved scope of work NDT inspections for this aircraft type.</p> <p>This organization needs to have part-66 certifying staff and NDT personnel qualified in accordance with 145.A.30(f).</p> <p>In this case the NDT inspector performs the NDT task and signs off the work order. The aircraft is released by appropriately qualified B1, B3, C or L certifying staff under the organisation's A rating.</p> <p>Please note that the release may include not only the NDT task but also the associated tasks (removal of panels, blankets, wires, re-installation, etc), or the NDT task may be part of a base maintenance check.</p> |
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| <p>Engines</p> <p>Class B</p> | <p>The release of the engine maintenance carried out under B class rating has to be performed by engine's certifying staff.</p> | <p>The certifying staff is qualified following the procedures established by the organisation in compliance with the competent authority requirements. Part-66 licence is not required.</p> | <p>The release of works performed under class B is done on an EASA Form 1 (or by means of an internal release document when this component is for the organisation's own use and the organisation has in place the related internal procedures in the MOE).</p> | <p>A Part-145 organisation holding a B rating approval on a particular engine type and having in its approved scope of work NDT inspections for this engine type.</p> <p>This organization needs to have "engine" certifying staff (qualified in accordance with company procedures) and NDT personnel qualified in accordance with 145.A.30(f).</p> <p>In this case the NDT inspector performs the NDT task and signs off the work order. The engine certifying staff releases the works performed to the engine (including NDT inspection) on an EASA Form 1.</p> |
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| <p>Components</p> <p>Class C</p> | <p>The release of the component maintenance carried out under C class rating has to be performed by components certifying staff (CCS).</p> | <p>The certifying staff is qualified following the procedures established by the organisation in compliance with the competent authority requirements. The CCS is not required to have a Part-66 licence.</p> | <p>The release of works performed under class C is done on an EASA Form 1 (or by means of an internal release document when this component is for the organisation's own use and the organisation has in place the related internal procedures in the MOE).</p> | <p>A Part-145 organisation holding a C rating approval on a particular component and having in its approved scope of work NDT inspections for this component.</p> <p>This organization needs to have CCS and NDT personnel qualified in accordance with 145.A.30(f).</p> <p>In this case the NDT inspector performs the NDT task and signs off the Work Order / Engineering Order. The CCS releases the works performed to the component (including NDT inspection) on an EASA Form 1.</p> |
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| Specialised services | The release of the maintenance carried out under D1 class rating has to be performed by “specialised services” certifying staff. | The certifying staff is qualified following the procedures established by the organisation in compliance with EN4179, Part-66 licence is not required. | The release of works performed under class D1 rating is done on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the MOE in compliance with 145.A.50 and approved by the competent authority. | <p>A Part-145 organisation holding a D1 approval on a particular NDT method. The approved scope of work will be NDT inspections on this method.</p> <p>This organisation needs to have NDT certifying staff qualified in accordance with 145.A.30(f).</p> <p>In this case the NDT certifying staff performs and releases the NDT task on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the MOE in compliance with 145.A.50 and approved by the competent authority.</p> |
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Note: In case of non-EU organisations approved by the EASA in accordance with Part-145, the Part-66 licence could be read as “Part-66 or national licence in accordance with Part-145 Appendix IV”

**Part-CAO:**

| Part-145<br>organisation                                                                    | Certifying staff<br>required                                                                                                                       | Qualification system                                            | General Release procedure                                                                                       | Release procedure for an NDT<br>inspection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Aircraft<br>(class<br>aeroplanes,<br>helicopter,<br>airships,<br>balloons or<br>sailplanes) |                                                                                                                                                    |                                                                 |                                                                                                                 | <p>A Part-CAO organisation holding an aeroplanes, helicopter, airships, balloons or sailplanes particular aircraft type or and having in its approved scope of work NDT inspections for this aircraft type.</p> <p>This organization needs to have part-66 certifying staff and NDT personnel qualified in accordance with CAO.A.035(f).</p> <p>In this case the NDT inspector performs the NDT task and signs off the work order. The aircraft is released by appropriately qualified B1, B3 or L certifying staff under the organisation's aeroplanes, helicopter, airships, balloons or sailplanes rating.</p> <p>Please note that the release may include not only the NDT task but also the associated tasks (removal of panels, blankets, wires, re-installation, etc), or</p> |
|                                                                                             | <p>The release of the aircraft maintenance carried out under A class rating has to be performed by certifying staff holding a Part-66 licence.</p> | <p>Licencing of personnel has to follow Part-66 regulation.</p> | <p>The release is either on the aircraft technical log or issuing an aircraft release to service statement.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

the NDT task may be  
part of a base  
maintenance check.

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| Engines or<br>Components<br>other than<br>complete<br>engines<br>Class<br>Components                                                                                                                                      | The certifying<br>staff is qualified<br>following the<br>procedures<br>established by<br>the<br>organisation,<br>Part-66 licence<br>is not required.                                                                                                                                            | A Part-CAO organisation<br>holding a components<br>rating approval on a<br>particular engine type or<br>'components other than<br>complete engines' and<br>having in its approved<br>scope of work NDT<br>inspections for this<br>engine type.                                                                                                                                                                                                                                                                                                                                            |
| The release of<br>the engine<br>maintenance<br>carried out<br>under<br>components<br>class rating<br>has to be<br>performed by<br>'engine's' or<br>'components<br>other than<br>complete<br>engines'<br>certifying staff. | The release of works<br>performed under class<br>components is done on an<br>EASA Form 1 (or by means<br>of an internal release<br>document when this<br>component is for the<br>organisation's own use and<br>the organisation has in<br>place the related internal<br>procedures in the CAE). | This organization needs<br>to have "engine" or<br>'components other than<br>complete engines'<br>certifying staff (qualified<br>in accordance with<br>company procedures)<br>and NDT personnel<br>qualified in accordance<br>with CAO.A.035(f).<br>In this case the NDT<br>inspector performs the<br>NDT task and signs off<br>the work order. The<br>engine or 'components<br>other than complete<br>engines' certifying staff<br>releases the works<br>performed to the engine<br>or 'components other<br>than complete engines'<br>(including NDT<br>inspection) on an EASA<br>Form 1. |

## Components

## Class C

|                                                                                                                                     |                                                                                                                                                                                                        |                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The release of the component maintenance carried out under C class rating has to be performed by components certifying staff (CCS). | The certifying staff is qualified following the procedures established by the organisation in compliance with the competent authority requirements. The CCS is not required to have a Part-66 licence. | The release of works performed under class C is done on an EASA Form 1 (or by means of an internal release document when this component is for the organisation's own use and the organisation has in place the related internal procedures in the MOE). | A Part-145 organisation holding a C rating approval on a particular component and having in its approved scope of work NDT inspections for this component.<br><br>This organization needs to have CCS and NDT personnel qualified in accordance with 145.A.30(f).<br><br>In this case the NDT inspector performs the NDT task and signs off the Work Order / Engineering Order. The CCS releases the works performed to the component (including NDT inspection) on an EASA Form 1. |
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Specialised  
services

A Part-CAO organisation holding a 'Specialised Services' approval on a particular NDT method. The approved scope of work will be NDT inspections on this method. This organisation needs to have NDT certifying staff qualified in accordance with CAO.A.035(f). In this case the NDT certifying staff performs and releases the NDT task on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the CAE in compliance with CAO.A.070 and approved by the competent authority.

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| The release of the maintenance carried out under 'Specialised Services' class rating has to be performed by "specialised services" certifying staff. | The certifying staff is qualified following the procedures established by the organisation in compliance with EN4179, Part-66 licence is not required. | The release of works performed under class 'Specialised Services' rating is done on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the CAE in compliance with CAO.A.070(a) and approved by the competent authority (AMC1 CAO.A.070 (a)(1)). |  |
|------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

Note: In case of non-EU organisations approved by the EASA in accordance with Part-145, the Part-66 licence could be read as "Part-66 or national licence in accordance with Part-145 Appendix IV"

**Last updated:**

01/02/2021

**Link:**

<https://www.easa.europa.eu/en/faq/19055>

**We are a maintenance organisation approved for component maintenance (B/C-rated Part-145 organisation, or Part-CAO with class “component”). Can we issue a “removed serviceable” EASA Form 1 for a component removed from an engine/component off-aircraft in our organisation?**

**Answer**

The current point 2.6 of AMC2 145.A.50(d) or AMC1 CAO.A.070(a) refers to the issue of an EASA Form 1 for serviceable aircraft components removed from serviceable aircraft registered in a Member State (\*).

This AMC provision is to be used only for components removed from serviceable Member State registered **aircraft**, not from engine/component off-aircraft, regardless of whether such engine/component is serviceable or not. Components removed from a higher assembly (engine or another component) off-aircraft are expected to undergo workshop maintenance in accordance with the relevant maintenance data before the EASA Form 1 (certifying such maintenance) is issued.

Note that an A-rated Part-145 maintenance organisation or a Part-CAO organisation with class “aircraft” can issue an EASA Form 1 following a “removed serviceable” procedure for a (sub)component removed from a higher assembly component when such higher assembly is still installed on (or temporarily removed from) serviceable Member State registered aircraft, following the procedure of the referred AMCs.

(\*) means an aircraft which is registered in a Member State and holds a valid (R)CofA issued in accordance with [Reg. \(EU\) No 748/2012](#) and an ARC.

**Last updated:**

22/10/2024

**Link:**

<https://www.easa.europa.eu/en/faq/140533>

**We are a maintenance organisation approved for component maintenance (B/C-rated Part-145 organisation, or Part-CAO with class “component”). Can we issue an EASA Form 1 in accordance with point 145.A.50(d) after maintenance performed on an engine/component on-wing on a non-EU-**

## registered aircraft?

### Answer

Non-EU countries are sovereign to set acceptable procedures to be followed on aircraft under their register. They can establish that components maintained by organisations approved in accordance with Part-145 (or Part-CAO) of Regulation (EU) No 1321/2014 and released with an EASA Form 1 can be installed on aircraft on their register.

Since component removed from third-country aircraft may be subject (under certain conditions) to off-wing component maintenance by Part-145 (or Part-CAO) organisation (with the issue of an EASA Form 1 after maintenance), there is no objection that a B/C-rated Part-145 organisation (or a CAO with class “component”) performs a work order and issues an EASA Form 1 to certify maintenance on engines/components installed on (or temporarily removed from) a non-EU-registered aircraft while this aircraft undergoes line or base maintenance. The B/C-rated Part-145 (or CAO) organisation needs for this an approved MOE procedure to conduct maintenance away from an approved location.

*Note: In accordance with Regulation (EU) No 1321/2014, an appropriately approved organisation issuing an EASA Form 1 certifies that the requested maintenance has been properly accomplished on the component; but **this form does not provide permission for the installation of the component** on an EU-registered aircraft. Particular care is necessary for components originating from non-EU registered aircraft and intended for installation on EU-registered aircraft (ref. point 2.8 of AMC2 145.A.50(d)).*

### Last updated:

22/05/2025

### Link:

<https://www.easa.europa.eu/en/faq/142008>

**My maintenance organisation (B/C-rated Part-145 organisation or combined airworthiness organisation (CAO) with class “components”) has received a work order for the ‘overhaul’ of an engine or component. What conditions should be fulfilled in order to issue EASA Form 1 with “Overhauled” Status/Work in Block 11?**

### Answer

**For reference:** “Overhaul is defined as a process ensuring that the item conforms fully to all

*applicable service tolerances specified by the type certificate (TC) holder, equipment manufacturer, or other data approved/accepted by the Authority. It requires at least disassembly, cleaning, inspection, repair as necessary, reassembly, and testing.” (Paragraph 5, Block 11 of Appendix II to Annex I (Part-M) of [Regulation \(EU\) No 1321/2014](#)).*

In case the appropriately rated approved maintenance organisation (AMO) has received a clear work order for an overhaul and holds the applicable maintenance data for the part (e.g. Component Maintenance Manual (CMM), if available), the AMO may proceed with the overhaul if:

1. The original equipment manufacturer (OEM) defines an overhaul process in the maintenance data (e.g. in the CMM). In this case, the AMO must follow it as the primary reference. The AMO can then certify the component as "Overhauled" in Block 11, describing the maintenance actions carried out in Block 12.
2. If no overhaul process is defined in the maintenance data, there are two options:
  1. Apply the EASA definition of "overhaul" by dismantling, cleaning, inspecting, repairing (as necessary), reassembling, and testing the component; or
  2. When, for example, a full disassembly or testing is not possible without causing damage and there are service tolerances specified for the part/component by the TC holder, equipment manufacturer, Instructions for Continuing Airworthiness (ICAs), or other data approved/accepted by the Authority, perform **all possible maintenance actions** described in the available maintenance data.

We assume that, in either case, the AMO has ensured that the component meets all applicable service tolerances.

Therefore, under these conditions, it would be acceptable to certify the component as "Overhauled" in Block 11 of EASA Form 1.

It is worth noting that points "a" and "b" are effectively equivalent to an overhaul when the CMM already includes a sequence of disassembly, cleaning, inspection, repair (if necessary), reassembly, and testing, which mirrors the requirements of Appendix II to Part-M.

### **NB**

- If a CMM exists for a certain part, and the AMO does not have access to it, the part cannot be released as "Overhauled" based only on other general documents such as an Engine Shop Manual (ESM).
- If a specific overhaul procedure is defined in the maintenance data but not fully followed, the part cannot be released as "Overhauled".
- In all cases, the AMO must clearly describe in Block 12 of EASA Form 1 the maintenance actions performed to achieve the "Overhauled" status, as well as the reference to the

chapter(s) of the maintenance data used.

**Last updated:**

02/06/2025

**Link:**

<https://www.easa.europa.eu/en/faq/142042>

## Maintenance data

**Shall the maintenance data be available and controlled at all times, even if there is no maintenance work going, or shall it be available only during the performance of maintenance?**

**Answer**

Maintenance data has direct influence on many processes of the approved maintenance organisation (AMO) and contributes to demonstrate the overall capability of the organisation to perform maintenance.

The maintenance data either can be arranged directly by the AMO or provided by the customer/operator as specified by 145.A.45(a), M.A.609 or CAO.A.055(a). In both cases, the AMO should demonstrate that the maintenance data used, regardless of the source, is up-to-date. To discharge this responsibility, a procedure should be established to:

(a) control the amendment status of any documents being used;

and

(b) regularly check that all amendments are being received, e.g. by subscribing to a document amendment scheme (sufficient in case of direct access to the maintenance data through the DAH/OEM. The subscription to the maintenance data distribution system of the customer/operator is insufficient, additional independent verifications through the original author shall be done).

When the maintenance data is arranged directly by the AMO it shall be available and controlled continuously.

There are certain situations when the maintenance data can be obtained only through the customer/operator. One of the examples would be the maintenance data for the large aircraft. The maintenance data coming from the TC holder is usually customised because of the model/configuration/modification/order of aircraft, so it is normally not possible for the AMO to have this customised maintenance data directly from TC holder without having an aircraft of

that type under the contract.

When the maintenance data is provided by the customer/operator, it shall be held and controlled by the AMO during maintenance on the concerned aircraft/component. Whenever the maintenance data is not available or not current, the maintenance shall not be performed and released.

Additionally, as part of the obligation for maintenance records, used maintenance data shall be:

- recorded (in compliance with 145.A.55(c), M.A.614(c) or CAO.A.090(b))
- Remark: Manuals issued by the (S)TC (Supplementary Type Certificate) holder such as AMM and CMM do not need to be stored as a record. Recording the revision status of such manual may be sufficient [AMC 145.A.55(c), AMC M.A.614(c)]; and
- accessible for auditing purpose

to demonstrate that the organisation worked in compliance with their respective requirements.

#### Last updated:

02/02/2021

#### Link:

<https://www.easa.europa.eu/en/faq/19104>

## Personnel requirements

### Can a certification maintenance requirement (CMR) be performed by the Flight Crew before flight?

#### Answer

Normally the flight crew should not release CMR task unless that task is included in a “repetitive pre-flight airworthiness directive” under the conditions of 145.A.30(j)(3), M.A.606(h)(1) or CAO.A.040(c)(1)

In case of aircraft operated away from a supported location, the provisions of 145.A.30(j)(4), M.A.606(h)(2) or CAO.A.040(c)(2) could be used for CMRs as long as all the applicable conditions are met. In particular:

- sufficient practical training has been carried out.
- there is a procedure in the Maintenance Organisation Exposition, Maintenance Organisation Manual or Combined Airworthiness Exposition (CAE).

*the task is considered “minor maintenance or a simple check” (AMC 145.A.30(j)(4) point 2(i) or AMC M.A.606(h)(2) point 2).*

**Last updated:**

02/02/2021

**Link:**<https://www.easa.europa.eu/en/faq/19105>**What is the meaning of the Protected Rights in the Appendix IV to Part-145?****Answer**

The protected rights mentioned in paragraph 2(a) of the Appendix IV to Part-145 were included in the Regulation 2042/2003 for the persons who were already working in a Part-145 organisation in a location situated outside the EU before the entry into force of Part-66. These protected rights allowed those persons to continue exercising (inside that particular Part-145 organisation) the privileges of the certification authorisation issued by that Part-145 organisation without the need to comply with paragraphs 1(c) to 1(f).

If this person changed the employment to a different Part-145 approved organisation after the entry into force of Part-66 (i.e. 28 November 2003), the previous certification authorisation is not valid and he/she needs to receive a new one from the new Part-145 approved organisation. In this case paragraph 2 of Appendix IV is not applicable anymore.

This implies that any new or extended authorisation granted by AMOs to their C/S after the entry into force of Part-66 must comply with paragraphs 1(c) to 1(f) in particular regarding the type training certificates.

**Last updated:**

23/01/2017

**Link:**<https://www.easa.europa.eu/en/faq/21913>**What are the training requirements for personnel within a Part-145 organisation, other than those contained in Part-66?****Answer**

| Requirement                                                                          | Reference            |
|--------------------------------------------------------------------------------------|----------------------|
| The accountable manager shall demonstrate a <b>basic understanding of Part-145</b> . | 145.A.30(a) point 3. |
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| <p>The person or group of persons nominated responsible for ensuring that the organisation complies with Part-145 (including the Quality Manager) shall be able to demonstrate</p> <ul style="list-style-type: none"> <li>• <b>relevant knowledge, background and satisfactory experience related to aircraft or components maintenance as applicable,</b></li> <li>• <b>a working knowledge of Part-145,</b></li> </ul>                                                                                                                                                                                                                                                                                                                                      | <p>145.A.30(b) point 3.</p>                                                                                 |
| <p>The organisation shall establish and control the competence of personnel involved in any maintenance, airworthiness review management and/or quality audits in accordance with a procedure and to a standard agreed by the competent authority.</p> <p><b>In addition to the necessary expertise related to the job function, competence must include an understanding of the application of human factors and human performance issues appropriate to that person's function in the organisation.</b></p> <p><b>This should include also:</b></p> <ul style="list-style-type: none"> <li>• <b>Fuel Tank Safety training (AMC3 145-A-30(e) and Appendix IV to AMC 145.A.30(e) and 145.B.10(3)).</b></li> <li>• <b>EWIS training (AMC 20-22)</b></li> </ul> | <p>145.A.30(e) and associated AMC/GM.</p> <p>Appendix IV to AMC 145.A.30(e) and 145.B.10(3). AMC 20-22.</p> |
| <p>The organisation shall ensure that personnel who carry out and/or control a continued airworthiness non-destructive test of aircraft structures and/or components are <b>appropriately qualified for the particular non-destructive test in accordance with the European or equivalent Standard recognised by the Agency.</b></p> <p>Personnel who carry out any other specialised task shall be <b>appropriately qualified in accordance with officially recognised Standards.</b></p> <p>By derogation to this paragraph those personnel specified in paragraphs (g) and (h)(1) and (h)(2), qualified in category B1, B3 or L in accordance with Annex III (Part-66) may carry out and/or control colour contrast dye penetrant tests.</p>               | <p>145.A.30(f) and AMC 145.A.30(f).</p>                                                                     |
| <p>By derogation to paragraphs (g) and (h), in relation to the obligation to comply with Annex III (Part-66), the organisation may use certifying staff qualified in accordance with the following provisions:</p> <p>1. For organisation facilities located outside the Community territory certifying staff may be <b>qualified in accordance with the national aviation regulations of the State in which the organisation facility is registered subject to the conditions specified in Appendix IV to this Part.</b></p>                                                                                                                                                                                                                                 |                                                                                                             |

2. For line maintenance carried out at a line station of an organisation which is located outside the Community territory, the certifying staff may be **qualified in accordance with the national aviation regulations of the State in which the line station is based, subject to the conditions specified in Appendix IV to this Part.**

3. For a repetitive pre-flight airworthiness directive which specifically states that the flight crew may carry out such airworthiness directive, the organisation may issue a limited certification authorisation to the aircraft commander and/or the flight engineer on the basis of the flight crew licence held. However, the organisation shall ensure that **sufficient practical training has been carried out to ensure that such aircraft commander or flight engineer can accomplish the airworthiness directive to the required standard.**

4. In the case of aircraft operating away from a supported location the organisation may issue a limited certification authorisation to the commander and/or the flight engineer on the basis of the flight crew licence held subject to being satisfied that **sufficient practical training has been carried out to ensure that the commander or flight engineer can accomplish the specified task to the required standard.** The provisions of this paragraph shall be detailed in an exposition procedure.

5. In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff are available, the organisation contracted to provide maintenance support may issue a one-off certification authorisation:

(i) to one of its employees **holding equivalent type authorisations on aircraft of similar technology, construction and systems;** or

(ii) to any person with **not less than five years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification** provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.

All such cases as specified in this point shall be reported to the competent authority within seven days of the issuance of such certification authorisation. The organisation issuing the one-off authorisation shall ensure that any such maintenance that could affect flight safety is re-checked by an appropriately approved organisation.

145.A.30(j)  
and  
associated  
AMC/GM.

Appendix IV  
to Part-145.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                        |
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| In addition to the appropriate requirements of 145.A.30(g) and (h), the organisation shall ensure that certifying staff and support staff have an <b>adequate understanding of the relevant aircraft and/or components, or both, to be maintained and of the associated organisation procedures</b> . In the case of certifying staff, this shall be accomplished before the issue or reissue of the certification authorisation.                                                                                                                                                                                            | 145.A.35(a)<br>and AMC<br>145.A.35(a). |
| The organisation shall ensure that all certifying staff and support staff are involved in at least <b>six months of actual relevant aircraft or component maintenance experience in any consecutive two-year period</b> .                                                                                                                                                                                                                                                                                                                                                                                                    | 145.A.35(c)<br>and AMC<br>145.A.35(c). |
| The organisation shall ensure that all certifying staff and support staff receive <b>sufficient continuation training in each two-year period to ensure that such staff have up-to-date knowledge of relevant technology, organisation procedures and human factor issues</b> .                                                                                                                                                                                                                                                                                                                                              | 145.A.35(d)<br>and AMC<br>145.A.35(d). |
| The organisation shall establish a <b>programme for continuation training</b> for certifying staff and support staff, including a procedure to ensure compliance with the relevant paragraphs of 145.A.35 as the basis for issuing certification authorisations under this Part to certifying staff, and a procedure to ensure compliance with Annex III (Part 66).                                                                                                                                                                                                                                                          | 145.A.35(e)<br>and AMC<br>145.A.35(e). |
| Except where any of the unforeseen cases of 145.A.30(j)(5) apply, the organisation shall <b>assess all prospective certifying staff for their competence, qualification and capability to carry out their intended certifying duties</b> in accordance with a procedure as specified in the exposition prior to the issue or reissue of a certification authorisation under this Part.                                                                                                                                                                                                                                       | 145.A.35(f)<br>and AMC<br>145.A.35(f). |
| The holder of a category A aircraft maintenance licence may only exercise certification privileges on a specific aircraft type following the satisfactory completion of the <b>relevant category A aircraft task training</b> carried out by an organisation appropriately approved in accordance with Annex II (Part-145) or Annex IV (Part-147). <b>This training shall include practical hands on training and theoretical training as appropriate for each task authorised</b> . Satisfactory completion of training shall be demonstrated by an examination or by workplace assessment carried out by the organisation. | 145.A.35(n)<br>and AMC<br>145.A.35(n). |
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| <p>The holder of a category B2 aircraft maintenance licence may only exercise the certification privileges described in point 66.A.20(a)(3)(ii) of Annex III (Part-66) following the satisfactory completion of (i) the <b>relevant category A aircraft task training</b> and (ii) <b>six months of documented practical experience covering the scope of the authorisation that will be issued. The task training shall include practical hands on training and theoretical training as appropriate for each task authorised.</b> Satisfactory completion of training shall be demonstrated by an examination or by workplace assessment. Task training and examination/assessment shall be carried out by the maintenance organisation issuing the certifying staff authorisation. The practical experience shall be also obtained within such maintenance organisation.</p> | <p>145.A.35(o)<br/>and AMC<br/>145.A.35(o).</p>                     |
| <p><b>Pre-flight inspections</b> (when the 145 organisation has an agreement with an operator)</p> <p>It should be demonstrated that the personnel carrying out pre-flight inspections have received <b>appropriate training for the relevant pre-flight inspection tasks based on the operator's CAME.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>ML.A.301(a)<br/>or<br/>M.A.301(a)<br/>and AMC<br/>M.A.301(a)</p> |

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02/02/2021

**Link:**

<https://www.easa.europa.eu/en/faq/19100>