



EUROPEAN AVIATION SAFETY AGENCY
AGENCE EUROPÉENNE DE LA SÉCURITÉ AÉRIENNE
EUROPÄISCHE AGENTUR FÜR FLUGSICHERHEIT

Current regulatory framework Part-M

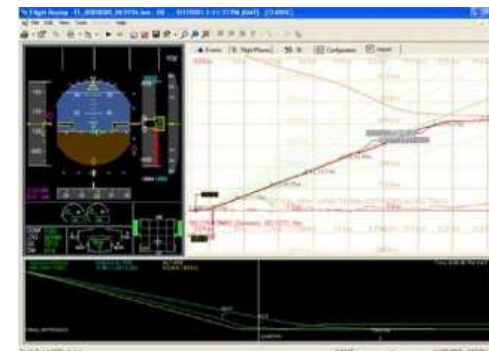
28 June 2012
Rosa Tajés
EASA-Rulemaking Directorate

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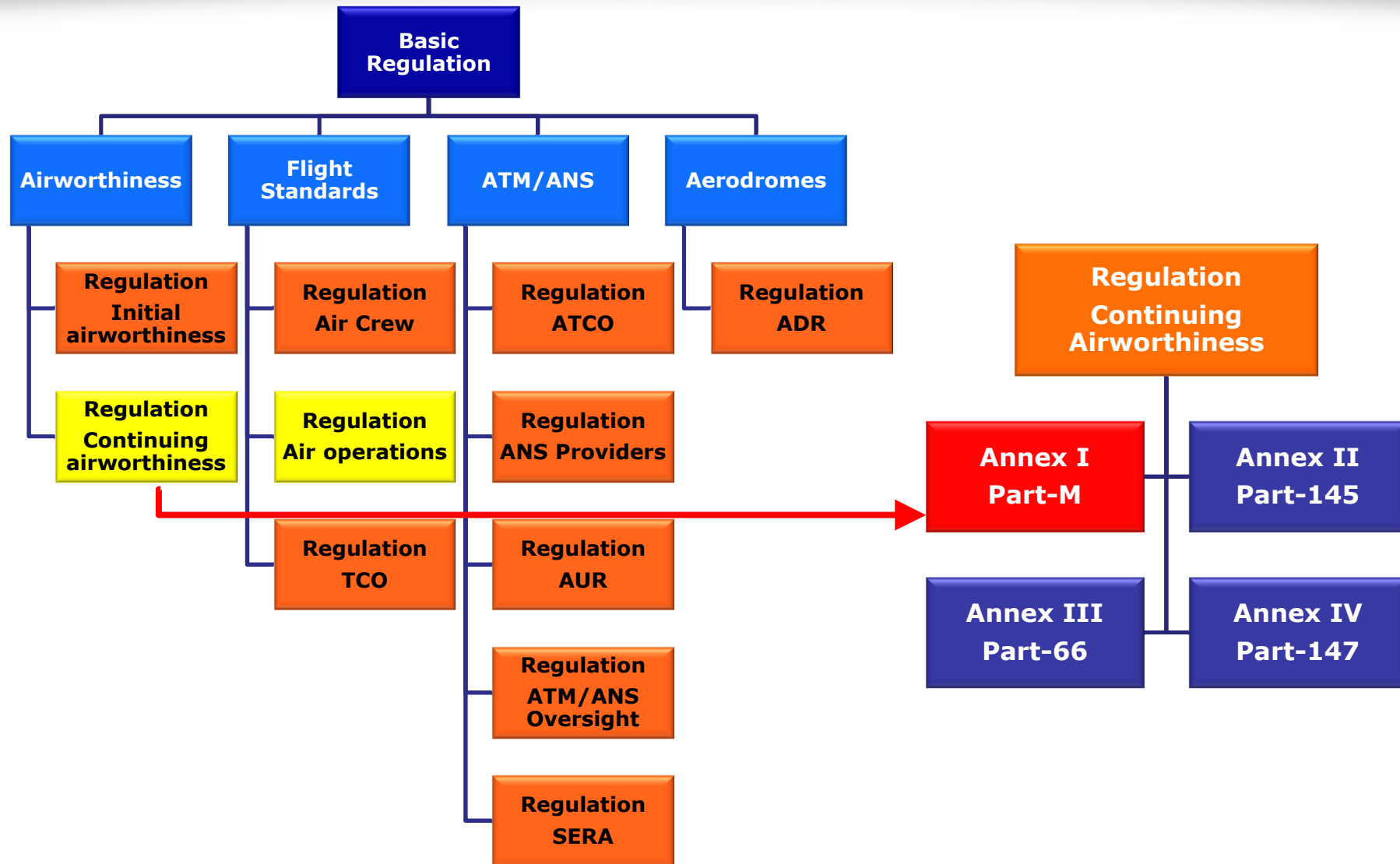
Outline

- European Rule Structure
- Basic regulation
- M.A.201 responsibilities
- M.A.711 privileges
- AMC M.A.201
Subcontracting
- Section B requirements





European rule structure – Regulations





Basic Regulation

Annex IV: Essential requirements for air operations

All a/c

Point 6. Continuing airworthiness tasks

Point 8.g: the continuing airworthiness tasks must be controlled by an organisation responsible for the continuing airworthiness management

**CMPA,
commercial operations**



M.A.201 Responsibilities

M.A. 201 (f) Large aircraft	Continuing airworthiness management to be performed by a CAMO. It can be a <u>contracted</u> CAMO
M.A.201 (i) (1) Commercial operations	Continuing airworthiness management to be performed by a CAMO. It can be a <u>contracted</u> CAMO
M.A.201 (h)(1) CAT	Operator shall be CAMO approved



M.A.711 CAMO Privileges

- Manage continuing airworthiness of aircraft:
 - not involved in CAT as listed in the approval schedule.
 - involved in CAT when listed in its AOC.



- Subcontract tasks to **an organisation working under its quality system**





AMC M.A.201 (h)1

The CAMO management of the sub-contracted activities should be:

accomplished

- (a) by active control through direct involvement and/or
- (b) by endorsing the recommendations made by the sub-contracted organisation

reflected in a written contract, and

in accordance with the procedures defined in the CAME



Appendix II to AMC M.A.201 (h)1 Subcontracting

Subcontracted tasks should be addressed in a contract

conduct a pre-contract audit

operator should ensure that the subcontractor has sufficient personnel who are trained and competent

contract should provide for competent authority monitoring

operator should have procedures for the control of subcontractor

operator should monitor the subcontractor, including audits

operator should have personnel to control the standards of the subcontractor

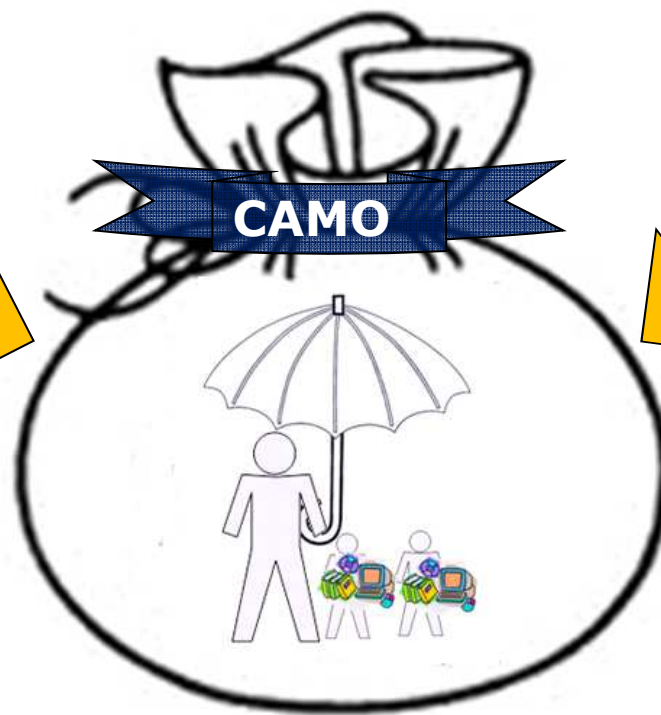
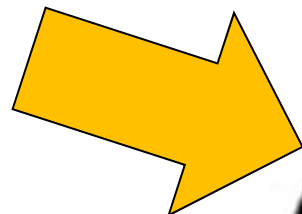




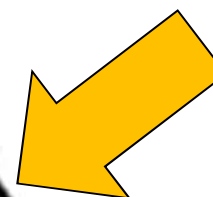
Section B requirements

The competent authority shall verify the **organisation** compliance with M.A. Subpart G requirements

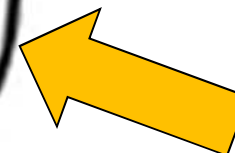
**M.B.702 (c)
initial approval**



**M.B.704 (b)
continuing oversight**



M.B.706 changes





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OPS requirements and AMC for contracted activities

28 June 2012

Hervé JULIENNE

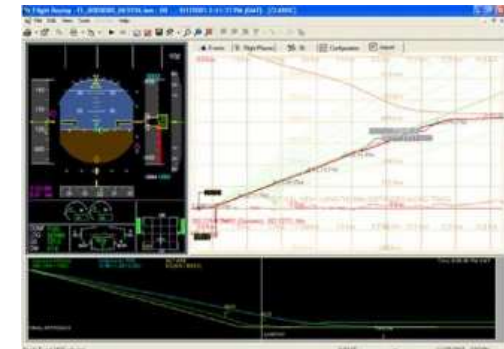
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(R3.2)**

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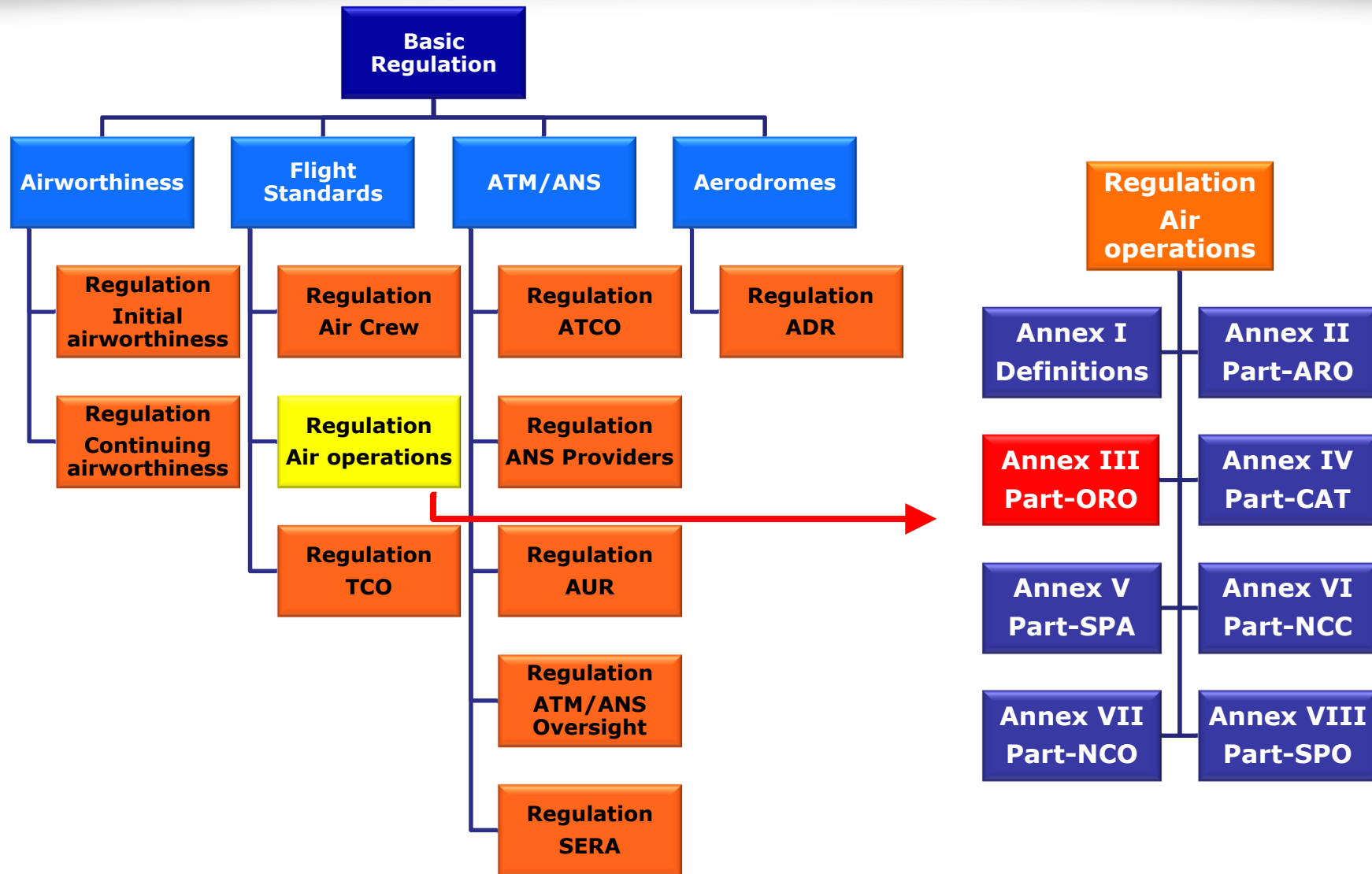
Outline

- Outline
- Structure/Status of EASA OPS rules
- Subcontracting provisions in the new EASA OPS rules
- Upcoming RMT





European rule structure – Regulations





Transition from national to European rules

Today

European rules:

- EU-OPS (CAT with aeroplanes)

National rules:

- Commercial operations except for CAT(A)
- Non-commercial operations

From 2012

European rules:

- Commercial operations
- Non-commercial operations

(Some aircraft are excluded from the scope of the European rules, e.g. historic aircraft, very light aircraft)

National rules:

For aircraft excluded from the scope of the European rules



ORO.GEN.205 Contracted activities

- a) Contracted activities include all activities within the operator's scope of approval that are performed by another organisation either itself certified to carry out such activity or if not certified, working under the operator's approval. The **operator shall ensure** that when contracting or purchasing any part of its activity, the contracted or purchased service or product **conforms to the applicable requirements**.
- b) When the certified operator contracts any part of its activity to an organisation that is not itself certified in accordance with this Part to carry out such activity, the contracted organisation shall work **under the approval of the operator**. The contracting organisation shall ensure that the competent authority is given access to the contracted organisation, to determine continued compliance with the applicable requirements.



AMC1 ORO.GEN.205 Contracted activities **RESPONSIBILITY WHEN CONTRACTING ACTIVITIES.**

- (a) The operator may decide to contract certain activities to external organisations.
- (b) A written agreement should exist between the operator and the contracted organisation clearly defining the contracted activities and the applicable requirements.
- (c) The contracted safety related activities relevant to the agreement should be included in the operator's safety management and compliance monitoring programmes.
- (d) The operator should ensure that the contracted organisation has the necessary authorisation or approval when required, and commands the resources and competence to undertake the task.



GM1-ORO.GEN.205 Contracted activities

CONTRACTING - GENERAL

(a) Operators may decide to contract certain activities to external organisations for the provision of services related to areas such as:

- (1) ground de-icing/anti-icing;
- (2) ground handling;
- (3) flight support (including performance calculations, flight planning, navigation database and dispatch);
- (4) training; and
- (5) manual preparation.

(b) The ultimate responsibility for the product or service provided by external organisations should always remain with the operator.



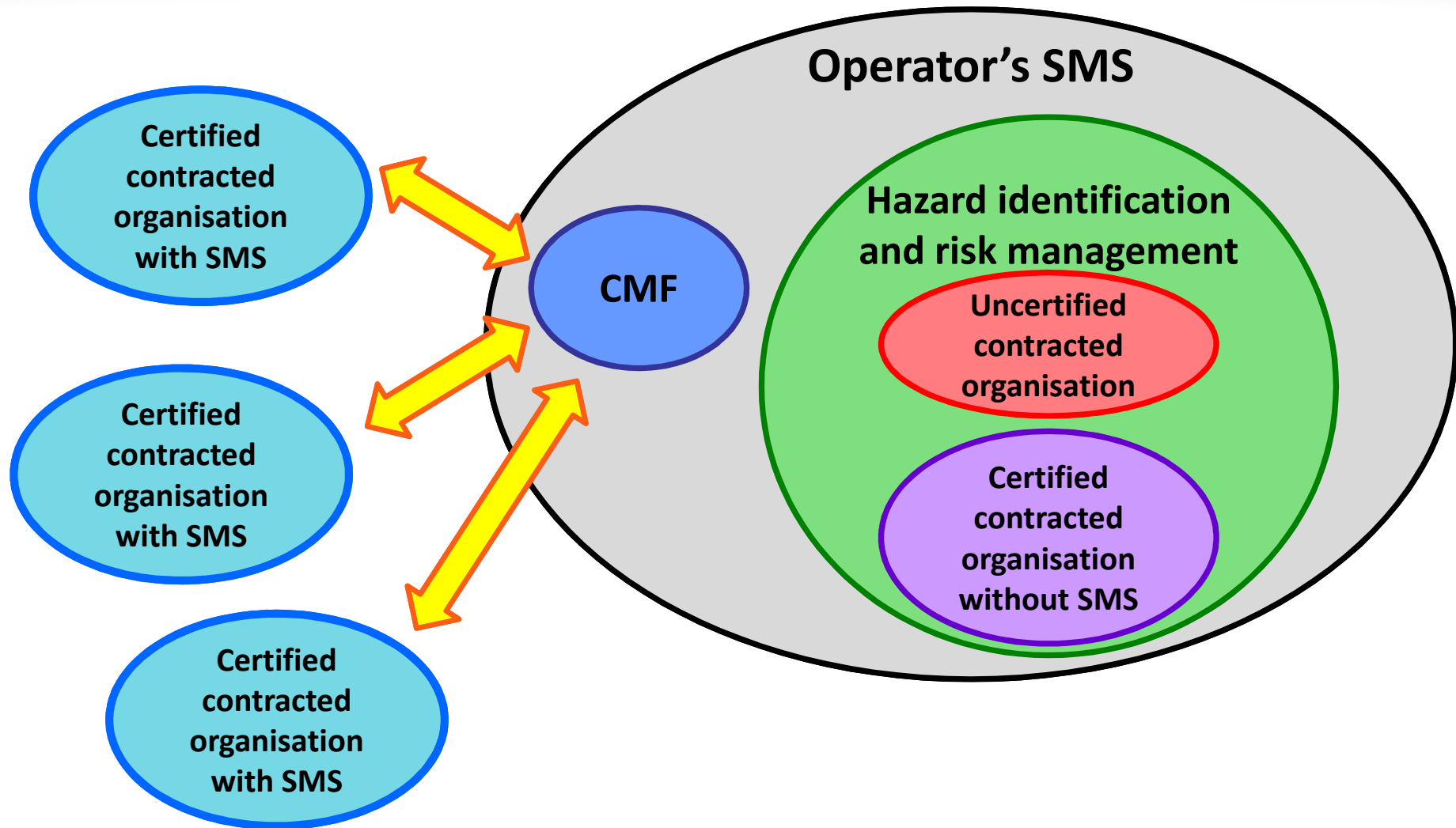
GM2 ORO.GEN.205 Contracted activities

RESPONSIBILITY WHEN CONTRACTING ACTIVITIES

- (a) Regardless of the approval status of the contracted organisation, the contracting operator is responsible to ensure that all contracted activities are subject to hazard identification and risk management as required by ORO.GEN.200 (a)(3) and to compliance monitoring as required by ORO.GEN.200 (a)(6).
- (b) When the contracted organisation is itself certified to carry out the contracted activities, the operator's compliance monitoring should at least check that the approval effectively covers the contracted activities and that it is still valid.



Operators / contracted organisations





Upcoming RMT

Regulation 2042/2003 - Continuing Airworthiness

- **Scope:**

- Maintenance (Part-145 / Part-M Subpart F)
- Continuing Airworthiness Management ("Part-M Subpart G")
- Maintenance Training (Part-147)
- Aircraft Mechanics Licensing (Part-66)

- **SMS not yet implemented**

- Will be introduced through rulemaking **Task MDM.055** (ToRs published 07/2011)
- SMS elements will be based on those developed for **Flight Standards**
- NPA: September 2012
- Opinion/Decision: 2nd Quarter 2013 (Regulation one year later)



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Thanks for your attention
Any questions?

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