



Foreign Part-145 approvals User guide for Applicants & Approval Holders	Doc # Approval Date	UG.CAO.00006-008 10/11/2022
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Foreign Part-145 approvals - User Guide for Applicants & Approval Holders

UG.CAO.00006-008

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DOCUMENT CONTROL SHEET

Reference documents
a) Contextual documents
Applicable regulation are listed in the form “FO.CAO.00136 - Foreign Part-145 approvals-Documentation Index” last revision.
b) Internal documents
Applicable regulation are listed in the form “FO.CAO.00136 - Foreign Part-145 approvals-Documentation Index” last revision.

Log of issues		
Issue	Issue date	Change description
001	14/07/2010	First issue (Reissue of QMS Procedure S.P041)
002	13/11/2013	Reorganization and update of Foreign Part-145 procedures structure
003	01/09/2014	Update of Quality documents to implement the new corporate image of the Agency and the changes to the organization structure.
004	22/10/2015	Endorsement of comments received from stakeholders
005	13/10/2017	Endorsement of following topics/changes: findings corrective action process, communication in electronic format with applicants and approval holders, draft audit report at the closing meeting, shared audit process, endorsement of comments received from stakeholders
006	27/05/2019	<ul style="list-style-type: none"> Corporate identity of the Agency changed to European Union Aviation Safety Agency Management of approval with IFP (Inspection & Finding Platform) Introduced flexibility in the 3 months due date for initial/change audit findings
007	05/03/2020	<ul style="list-style-type: none"> Removal of fee level information
008	10/11/2022	<ul style="list-style-type: none"> Endorsement of Regulation (EU) 2021/1963 introducing SMS





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0.2. Definitions and abbreviations.

Abbreviations	
AMC	ACCEPTABLE MEANS OF COMPLIANCE
AMO	APPROVED MAINTENANCE ORGANISATION
AMTO	APPROVED MAINTENANCE TRAINING ORGANISATION
AOG	AIRCRAFT ON GROUND
BIPM	INTERNATIONAL BUREAU OF WEIGHTS AND MEASUREMENTS
CAO	COMBINED AIRWORTHINESS ORGANISATION
CAOA	CONTINUING AIRWORTHINESS ORGANISATION APPROVAL
CAP	CORRECTIVE ACTION PLAN
CIPM	INTERNATIONAL COMMITTEE ON WEIGHTS AND MEASUREMENTS
CMM	COMPLIANCE MONITORING MANAGER
C/S	CERTIFYING STAFF
CC/S	COMPONENT CERTIFYING STAFF
EASA	EUROPEAN UNION AVIATION SAFETY AGENCY
EU	EUROPEAN UNION
GM	GUIDANCE MATERIAL
ILAC	INTERNATIONAL LABORATORY ACCREDITATION COOPERATION
IORS	INTERNAL OCCURENCE REPORTING SYSTEM
MOA	MAINTENANCE ORGANISATION APPROVAL
MOAP	MAINTENANCE ORGANISATION APPROVAL PROCEDURES
MOC	MAINTENANCE OVERSIGHT COORDINATOR
MOE	MAINTENANCE ORGANISATION EXPOSITION
MOR	MANDATORY OCCURRENCE REPORTING
MRA	MUTUAL RECOGNITION ARRANGEMENT
NAA	NATIONAL AVIATION AUTHORITY
NRAB	NATIONAL RECOGNISED ACCREDITATION BODY
OEM	ORIGINAL EQUIPMENT MANUFACTURER
OMS	OVERSIGHT MANAGEMENT SOFTWARE
PPB	PRINCIPAL PLACE OF BUSINESS
QE	QUALIFIED ENTITY
RAB	REGIONAL ACCREDITATION BODY
S/S	SUPPORT STAFF
SMS	SAFETY MANAGEMENT SYSTEM
STCH	SUPPLEMENTAL TYPE CERTIFICATE HOLDER
TCH	TYPE CERTIFICATE HOLDER
WH	WORKING HOURS
WHOC	WORKING HOURS EASA OVERSIGHT COORDINATOR





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0.3. Scope and applicability.

EASA is the Competent Authority for maintenance organisations having their principal place of business located outside the EU, as established by EASA Part 145.1 “General” and is therefore responsible for the final approval of these maintenance organisations and for establishing procedures detailing how these EASA Part-145 applications and approvals are managed.

This user guide is applicable to EASA Part-145 applicant and EASA Part-145 AMOs’ (hereafter referred as maintenance organisations) having their principal place of business located outside the EU Member States and which are not certified under the provisions of a bilateral agreement signed with the EU.

The provisions of this user guide are complementary to the requirements of Part-145 regulation “as amended” and does not supersede or replace the associated regulatory requirements.

0.4. Purpose.

The purpose of this user guide is to describe how the maintenance organisation shall proceed when applying for an EASA Part-145 approval and how EASA will handle the initial investigation, the continued oversight of the approval of the maintenance organisation according to Part-145 regulation.

0.5. Entry into force

This document is applicable on 2 December 2022, after publication on the EASA website.

0.6. Associated instructions

EASA has developed associated instructions (user guides, Forms, templates and work instructions), that detail specific matters, which have to be considered as an integral part of this user guide.

A complete listing of these documents, together with their applicability to the maintenance organisation or NAA / QE / EASA, is addressed in the current revision of the “Foreign Part-145 approvals – documentation Index”, FO.CAO.00136-XXX (XXX identifies the revision number). Documents which are applicable to both NAA/QE/EASA and maintenance organisation are made available on the EASA Web Site (<http://easa.europa.eu>) - Continuing Airworthiness Organisations page.

Each time a cross reference is provided to another document or another chapter / paragraph of the same document, this reference is identified with **grey text**.

0.7. Communication.

All documents and correspondences between the maintenance organisation, the accredited NAA/QE and EASA shall be in the English language.





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0.8. Management of approvals by EASA

The [Oversight Management Software](#) is an IT tool which is being used for the management of approvals, including issuance of audit reports and findings management.

A phased approach is being used by EASA to introduce the approvals in the [OMS](#) tools. Therefore for a certain period of time, there will be approvals managed within and outside [OMS or transitioning between different OMS](#).

All CAO User Guides have a general applicability regardless if an approval is managed within or outside [OMS](#).

Whenever a difference applies, which requires a dedicated procedure for approvals managed in [OMS](#), the related procedure will be identified as indicated below:

Approvals
in [OMS](#)

Text of the dedicated procedure for approvals managed in [OMS](#)

0.9. Audit types

The following type of audits are identified:

- **Desktop audit:** is a paperwork exercise performed from the desk without any real-time interaction with the auditee;
- **On-site audit:** is an audit where the inspection team directly accesses the premises of the Organization, or the premises where the organization is performing maintenance (maintenance away from approved location, subcontractors premises, etc);
- **Remote audit:** is an audit performed with the use of any real-time video and audio communication tools in replacement of the physical presence of the inspector on-site. During this type of audit the inspector is visiting the organization on-site in a “virtual” mode;





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1 Initial approval.





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1.1 Application.

A new application for an EASA Part-145 maintenance organisation approval shall be made in accordance with Section A of EASA Part-145 by using the EASA Form 2. This application form shall be sent directly by e-mail to EASA via the 'foreign 145' email box (foreign145@easa.europa.eu), or online through EASA website. Details about on the EASA's regulation related to fees and charges can be found on the EASA website (www.easa.europa.eu).

EASA Applicant Services Department will acknowledge receipt of the application for applications received via the 'Foreign 145' mailbox (foreign145@easa.europa.eu) or online, from which an acknowledgement of receipt is automatically sent. When incorrect or incomplete information is supplied, [EASA Applicant Services Department will](#) notify the maintenance organisation as soon as possible by email detailing the omissions and errors.

According to the EASA "General Conditions and Terms of Payment" document all communications from EASA to applicants and approval holders will be in electronic format only.

An initial application package must include:

- The EASA Form 2 available on EASA (<http://easa.europa.eu>) - Continuing Airworthiness Organisations page;
- The Certificate of Incorporation (certificate of trade registration) as detailed on the EASA Form 2 with a translation in English. A courtesy translation may be accepted. The Certificate of [Incorporation](#) is aimed to demonstrate the Principal Place of Business and the legal entity name.

Once the application package is complete, the EASA CAO Section will check the eligibility of the application according to EASA Part-145 regulation. In case of refusal of an application, the EASA Applicant Services Department will notify this decision in writing to the maintenance organisation together with the reasons thereto.

1.2 Allocation of the investigation team.

The CAO Section decides when the application is to be further processed. This process is dependent upon the Inspectors manhours availability and varies depending from the amount of applications received on yearly basis. Only when an allocated inspector is identified, the application will be further processed, otherwise it will be kept on hold.

1.3 Notification of the allocation and payment of the application fee.

When eligibility has been fully assessed and the allocated inspector identified, the EASA Applicant Services Department calculates the fees according to the current fees and charges regulation and:

- communicates the contact details of the allocated inspector to the applicant. From this point in time, for any technical issue related to the investigation, the applicant shall contact the allocated inspector;
- sends the "initial application invoice" to the applicant;
- provides the preliminary approval number with a suffix "P" indicating the pending status of the approval (for example EASA.145.XXXXP);
- confirms the receipt of payment of any fees associated with the application. Missing the payment of the invoice within the terms prescribed by EASA would result in the termination of the application.

Note: For any administrative issue such as those related to fees and invoices, the maintenance organisation shall directly contact the EASA Applicant Services Department at foreign145@easa.europa.eu

1.4 Audit team composition.





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The CAO Section decides the audit team composition in addition to the allocated inspector (e.g. it may be composed of additional team members to carry out the investigation process, depending on the size/complexity of the organisation).

The criteria applied by EASA to determine the investigation team are as follows:

- Complexity of the maintenance organisation approval;
- Number and location of sites to be audited;
- Size of the maintenance organisation;
- Nature of the services to be covered by the maintenance organisation and its direct impact to aviation safety;
- Appropriate technical experts;
- Any additional reason deemed necessary by EASA and justified by a specific situation reported by the allocated inspectors.

In certain circumstances, the CAO Section Manager may decide to adjust the number of staff by adding one EASA team member or by temporarily replacing one of the nominated team member by an EASA one.

Trainee staff from EASA/NAA/QE may participate in investigation teams at no direct cost to the maintenance organisation.

Note: For all cases where a maintenance organisation wishes to have a maintenance facility (line station, workshop, storage, etc) located within the territory of the EU, EASA is required to coordinate with the NAA of that Member State. This may lead to additional inspector(s) from the NAA in which the maintenance facility is located at the expenses of the maintenance organisation.





1.5 *Technical investigation.*

1.5.1 *Kick-off meeting*

After the allocation of the investigation team, a kick-off meeting is organised by the allocated Inspector with the relevant persons from the applicant organisation.

1.5.1.1 *Meeting means*

The meeting is to be proposed to the applicant on conference call basis, to allow participation of all required parties at no cost. The applicant needs to ensure participation to the meeting of the proposed Accountable Manager and the nominated persons indicated in the EASA Form 2.

1.5.1.2 *Meeting objectives*

The objectives of the meeting are listed below:

- presentation of the allocated inspector and of the organisation management team;
- reviewing of the application EASA Form 2;
- discussing with the Accountable Manager and Nominated persons to explain what is expected from them;
- reviewing and discussing the certification process to ensure that the applicant understands what is expected;
- discussing the operation/activity the applicant wishes to undertake, the personnel and equipment available, the facilities to be used, and the approximate date when the approval is expected to start;
- identifying what is required to be submitted with the application package;
- explaining the obligation to provide access to facility, aircraft, document, records, data, procedures, etc and the need to produce all the information, documents and records which are part of the approval in English language.

1.5.1.3 *Meeting outcome*

The kick-off meeting is intended to clarify reciprocal expectations between the parties.

In case major complications to comply with EASA Part-145 regulations and to proceed with the investigation are identified during this meeting, the applicant may be provided a time slot (maximum 1 month) to perform a further internal review and consider a possible withdraw of the application.





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1.5.2 Development /Review of the maintenance processes.

The **applicant** maintenance organisation shall identify and analyse the maintenance processes intended to be included in the EASA Part-145 approval and ensure compliance of such processes with Part-145 regulation “as amended” and applicable EASA instructions which are available on the EASA web site.

1.5.3 Development of the maintenance exposition (i.e. MOE and management personnel).

Based upon this analysis /review the **applicant** maintenance organisation shall develop and provide the **allocated** inspector with the applicable foreign EASA **Résumés** and a draft of the MOE (including associated list(s) and procedure(s) as applicable) using the relevant EASA instructions as reference material.

Moreover for an Organisation which is applying for an Ax (Aircraft Maintenance) rating and is using the **provisions** of EASA Part-145 Appendix IV, to use staff not qualified in accordance with Annex III (Part-66) **the EASA Part-145 Appendix IV and ICAO Annex I check list FO.CAO.00030-XXX**, shall be completed as per the associated instructions.

1.5.4 Review of the provided documents by the allocated inspector.

1.5.4.1 MOE:

The **allocated** inspector reviews the draft MOE (including associated list(s) and procedure(s) as applicable) to ensure full compliance with the applicable requirements and the relevant EASA instructions.

When the proposed exposition is not acceptable (i.e. procedures or required information not available, not compliant with EASA Part-145 requirements and EASA instructions) and therefore could not be reviewed within the allocated time, the **allocated** inspector is required to stop the review and to send the draft of the MOE back to the maintenance organisation. The maintenance organisation will have to re-draft the MOE in accordance with the relevant EASA instructions.

In any case, the maintenance organisation is formally notified of the **allocated** inspector’s MOE comments.

If after several exchanges, the **applicant** maintenance organisation still fails to provide acceptable documents (MOE, Associated lists, procedures, ..), EASA will determine the most appropriate actions including termination of the application.

Approvals
in OMS

The MOE review is managed with a Desktop audit. The audit report is generated and forwarded to the maintenance organisation by the inspector. In addition, the findings are also notified through the **OMS** using an electronic workflow.

1.5.4.2 Management personnel

The **allocated** inspector verifies the compliance of the management structure and nominated personnel qualifications (refer to **WI.CAO.00115-006-XXX “Management Personnel”**).

1.5.5 Internal audit report from the maintenance organisation’s Compliance Monitoring system.

Once the draft of the MOE (including associated list(s) and procedure(s) as applicable) and the **proposed nominated personnel** are confirmed as being acceptable by the **allocated** inspector, the maintenance organisation’s **Compliance Monitoring department shall perform a pre-audit to verify that** the maintenance organisation in full for compliance with the MOE and Part-145 regulation “as amended”. All relevant EASA instructions dealing with specific technical matters (i.e. certifying staff, line maintenance, composite repairs, etc.) as applicable to the specific maintenance organisation, shall be also used as reference.

A statement signed by the organisation’s **Compliance Monitoring Manager (CMM)** shall be provided to the **allocated** inspector before the EASA audit **can be planned** confirming that processes, facilities, documentation, tools, equipment, material, components and personnel subject to the application have been reviewed and audited showing compliance with all applicable EASA Part-145 requirements. This means that all findings raised during this **pre-audit** must have been closed with appropriate corrective actions before issuing this statement.

The relevant internal audit report(s) including the associated corrective actions shall be provided by the maintenance organisation along with the **CMM** statement to the **allocated** inspector.





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1.5.6 Preparation of the EASA Audit.

After receipt of acceptable:

- draft of the MOE;
- [Résumés of the nominated personnel](#);
- associated documents;
- EASA Part-145 Appendix IV and ICAO Annex I check list FO.CAO.00030-XXX (if applicable);
- [Compliance Monitoring](#) Manager statement;
- internal [pre-audit report by the compliance monitoring function](#).

the [allocated](#) inspector may initiate the investigation in accordance with Section B of EASA Part-145, its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM) and relevant procedures.

The [applicant](#) maintenance organisation shall provide any necessary administrative support in order to get on time the Visa (i.e. invitation [letter](#), etc.), [access to the facilities/aircraft/records](#), the hotel reservation, etc.

The [allocated](#) inspector will:

- Liaise with the [applicant](#) maintenance organisation for scheduling the audit;
- Prepare and notify the [applicant](#) maintenance organisation of the audit program.

Note: In case of modification to the initial application, the maintenance organisation shall notify EASA before the investigation takes place by sending a revised EASA Form 2.

1.5.7 EASA audit.

When the audit programme is confirmed by the [allocated](#) inspector, the [applicant](#) maintenance organisation could at its own discretion decide to inform its National [Aviation](#) Authority for the purpose of inviting any representative to participate to the EASA audit as an Observer.

The [allocated](#) inspector shall start the investigation audit with an opening meeting with the maintenance organisation's management [including the](#) Accountable Manager. The following points shall be considered when carrying out the meeting:

- Confirmation of the audit schedule including objectives and scope of the audit.
- Confirmation of the required interviews / availability of the people involved in the EASA Part-145 process.
- Explanation on the method used for reporting non conformities.
- Confirmation of the applicable regulation and standards.
- [Access by the organization to the OMS \(as applicable\)](#)

The [allocated](#) inspector should be accompanied throughout the audit by a senior member of the organisation, who is normally the [compliance monitoring manager](#), to ensure that the organisation is fully aware of any findings raised during the audit.

The [allocated](#) inspector shall be permitted to:

- [examine the records, data, procedures, and any other material relevant to the investigation](#);
- [make copies or extracts from such records, data, procedures and other material](#);
- [ask for an oral explanation on-site from any of the personnel of the organisations](#);
- [enter relevant premises, operating sites or means of transport owned or used by the organization](#).

The Accountable Manager and all [nominated personnel](#) must be met and interviewed (as necessary) by the [allocated](#) inspector during this initial investigation.





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The audit team shall review the audit findings and evidences collected against the current/intended scope of approval, agree on level¹ and corrective action time scales and prepare the audit conclusions for presentation to the **applicant** maintenance organisation.

A closing meeting, chaired by the audit Team Leader will be held to present the audit findings and the conclusions to the organisation's management in order to ensure that they are understood and accepted. The maintenance organisation will be given the opportunity to discuss any non-compliance and timeframes.

A draft audit report should be provided to the organisation by the audit Team leader at the closing meeting. In case this is not possible for any reason (i.e. due to time constrains, etc.), the audit Team Leader will in any case debrief clearly the maintenance organisation during the closing meeting on the number of findings, level, due date plus a description of each finding raised against the applicable requirement.

The formal notification of the findings is sent by the **allocated** inspector to the maintenance organisation within a maximum of 15 calendar days from the end of the audit.

Observation can also be rised as described in [paragraph 3.2.4 of this User Guide](#).

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in OMS

The audit report, findings and observations as applicable, are notified through the **OMS** using an electronic workflow. At any time, the system allows to verify if a workflow is under the responsibility of the inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

Should the initial investigation lead to significant and/or numerous discrepancies, this would show insufficient understanding / compliance of the maintenance organisation and a lack of effectiveness of the **compliance monitoring** system. In that case, **EASA** may take the decision and inform the maintenance organisation accordingly:

- To terminate the application making the non-consumed fees eligible for reimbursement. Should the maintenance organisation wish to re-apply for an EASA Part-145 approval a new application to EASA **will be necessary**;
- To limit the requested scope of work;
- Not to accept the concerned nominated personnel.

For an initial audit the findings shall not be classified as Level 1 or 2 as the maintenance organisation is not approved. A maximum of three months is allowed to take corrective action for each finding raised during the initial audit. In case the organisation is unable to complete the corrective actions within the established three months, an extension request shall be submitted to the **allocated** inspector, which may be granted up to a maximum of another three months. Failure to comply within the timescale granted, could lead **EASA** to terminate the application.

Findings and observations made during the investigation process will be handled by the **allocated** inspector in accordance with Section B of EASA Part-145 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

When he/she is satisfied that the corrective actions proposed by the **applicant** maintenance organisation have been adequately implemented, he/she shall recommend the issue of the approval to EASA.

Depending on the extent and nature of the findings and the delay of corrective actions implementation, additional audit(s) may be necessary.

The **allocated** inspector is required to inform EASA about any inconsistencies with the number of staff required to meet the manpower requirements of the approval scope and rating as detailed in the MOE.

¹ For an initial audit the findings shall not be classified as Level 1 or 2 as the organisation is not approved yet.





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1.5.8 Recommendation.

Once the maintenance organisation’s compliance with EASA Part-145 has been established and all findings are closed, the **allocated** inspector will make a recommendation to EASA to issue the EASA Part-145 approval to the maintenance organisation. This includes the recommendation for **approval of MOE (including management personnel) and associated documents**.

Note: In the case it appears necessary to adjust the requested scope of approval, then an EASA Form 2 shall be **revised** reflecting the scope of approval to be recommended.





1.5.9 Issuance of an approval.

The recommendation package received from the allocated inspector is reviewed by EASA for compliance and accuracy. Once satisfied, EASA will prepare for signature by an EASA authorised person, as applicable:

- the certificate EASA Form 3;
- the approval letter of the MOE, together with its associated document(s) and list(s);

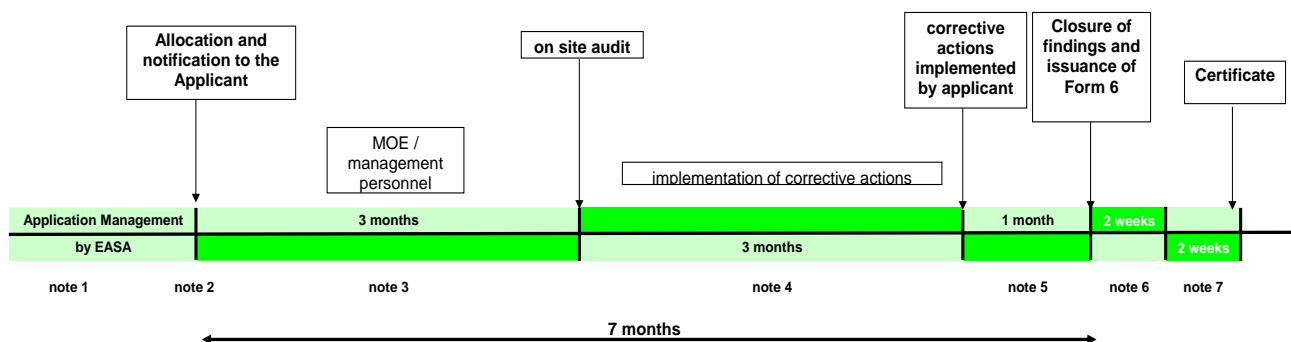
EASA will send the formal approval of all documents related to the EASA Part-145 approval such as EASA Form 3 Certificate, MOE, associated procedures and lists letter to the maintenance organisation with a copy to the allocated inspector

Approvals in OMS

- The EASA Form 3 is electronically generated and sent by email to the Organisation.
- The approval of the MOE, associated procedures/lists and any concession is formalized directly in the OMS.
- The system also identifies the management personnel which are part of the management structure, as specified in the approved MOE.

1.6 Time frame

The EASA Department responsible for the administrative and financial matters will establish the first annual surveillance fee invoice. The first annual invoice is due immediately after the issuance of the certificate. The normal time frame to process an EASA Part-145 approval is about 8 months from the allocation date; however the amount of time taken is largely dependent on the ability of the maintenance organisation to produce the documentation required and to rectify any non-conformity that may be identified during the certification process. Unless duly justified, failure to meet this time frame might lead to EASA to terminate the application.



- note 1: the MOE guidance is made available to the applicant
- note 2: The allocation is confirmed to the applicant by EASA, together with allocated inspector contact.
- note 3: MOE draft review by the team leader and correction by the applicant up to an acceptable level
- note 4: Implementation of corrective actions and notification to the Team Leader by the applicant.
- note 5: The allocated Inspector to close the findings and issue the Recommendation package
- note 6: Form 6 and TV quality check: 2 weeks NAA to review recommendation package and forward to EASA
- note 7: 2 weeks EASA to process the recommendation package and issue the certificate F3.





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2 Change.





2.1 Application.

This chapter applies only once the approval is granted. All changes as detailed in the EASA Part 145.A.85 and those related to administrative amendments (such as contact details, number of staff) require an EASA Form 2. An application for change of a maintenance organisation shall be made in accordance with Section A of EASA Part-145 by using the EASA Form 2 and its associated filling instruction, both available on EASA Web site: <http://easa.europa.eu> - Continuing Airworthiness Organisations page.

This Application form shall be sent directly by e-mail to EASA via the 'foreign 145' email box (foreign145@easa.europa.eu) or online through EASA website.

In order to keep the administrative workload at a reasonable level and to minimize the possible associated costs, the approval holders are recommended to combine change requests as much as possible instead of submitting several requests in the same short period of time (e.g. several applications within one month).

The EASA [Applicant Services Department](#) will check the application. When incorrect or incomplete information is supplied, to the maintenance organisation [will be notified](#) as soon as possible by email detailing the [problem](#). In case of refusal of an application, EASA Applicant Services Department will notify this decision in writing to the maintenance organisation together with the reasons thereto.

The communication process is done according the EASA "General Conditions and Terms of Payment" document, and it is the same as indicated in the initial application process ([chapter 1.1 "application" of this user guide](#)).

Once the application package is complete, the EASA [CAOA Section](#) checks the eligibility of the application according to EASA Part-145 regulation. This application for change must include:

- The Foreign EASA Form 2;
- In case of name change, a Certificate of Incorporation (certificate of trade registration) as detailed on the EASA Form 2 with a translation in English.

When eligibility has been fully assessed, EASA will inform the [allocated](#) inspector that the application can be processed.

Approvals
in OMS

The change is registered in the system and assigned to the allocated inspector. Each allocated inspector is provided a dashboard giving indication of the action items related to the approvals allocated to him/her.

In parallel, the maintenance organisation is invited to send to the [allocated](#) inspector all documents related to the change (MOE, associated lists, procedures, [Résumé](#), internal audit report,...).

Any impact of the change with fees will be processed by the EASA [Applicant Services Department](#). [Failure to notify the changes that require prior approval as per 145.A.85, may lead EASA to suspend the approval.](#)

2.2 Allocation of the investigation team.

By default the investigation is performed by the [allocated inspector](#). However, should it become necessary or more appropriate to allocate a different [inspector](#), the [CAOA Section](#) may decide to [allocate another inspector and inform the maintenance organisation in writing](#). In case of permanent change of the allocated inspector the [CAOA Section](#) informs the EASA Applicant Services Department to change the allocation, and a formal communication is sent to the maintenance organisation regarding the change of allocation.

2.3 Audit team composition.

The audit team composition shall be established in accordance the criteria defined in the [chapter "audit team composition" of this user guide](#).





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Upon specific circumstances, the [CAOA Section](#) Manager may decide to modify the number of staff by adding one EASA team member or by temporarily replacing one of the nominated team members by an EASA team member.

Note: For all cases where a maintenance organisation wishes to have facilities located within the territory of the EU, EASA is required to coordinate with the NAA of the Member state. This may lead to additional inspector(s) from the NAA in which the facilities are located at the expenses of the maintenance organisation.





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2.4 Technical investigation.

The technical investigation process for a change of approval as listed in 145.A.85 is identical to the initial process described in the chapter “technical investigation for initial approval” of this user guide. However the followings peculiar points shall be considered:

- The internal pre-audit performed by the compliance monitoring function shall cover at least all areas impacted by the requested change(s);
- Changes cannot be implemented prior to EASA formal approval. However, the allocated inspector shall liaise with the EASA MOC of all cases where the maintenance organisation wishes to operate in accordance with 145.B.330(b);
- Should the investigation for change lead to significant and/or numerous discrepancies, this would show insufficient understanding /compliance of the maintenance organisation and a lack of effectiveness of the compliance monitoring system. In that case the allocated inspector will liaise with the EASA MOC in order for EASA to terminate the application for change and to raise a finding against the compliance monitoring system. In this circumstance, the requested change cannot be approved and moreover such a lack of effective implementation of compliance monitoring system could lead EASA to limit or suspend the current approval;
- All findings that have an impact on the requested change must be listed and closed prior to the allocated inspector making the recommendation for the approval of the change to EASA; the other findings, not directly related to the change, will be managed as part of the on-going regular surveillance.
- Observation can also be raised as described in paragraph 3.2.4 of this User Guide.
- Changes of management personnel are managed in accordance with WI.CAO.00115-006-XXX “Management Personnel”.

For a change audit, the findings related to the change shall not be classified as Level 1 or 2 as the organisation is not approved. A maximum of three months is allowed to implement the corrective action for each finding raised during the change audit. In case the organisation is unable to complete the corrective actions within the established three months, an extension request shall be submitted to the allocated inspector, which may be granted up to a maximum of another three months.

Failure to comply within the timescale granted, could lead EASA to terminate the application.

Approvals
in OMS

The audit report, findings and observations as applicable, are also notified through the OMS using an electronic workflow. At any time, the system allows to verify if a workflow is under the responsibility of the inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

2.5 Time frame.

The time frame related to the approval of a change is highly variable depending on the nature of the change and the availability of the allocated inspector. The organisation should discuss with the allocated inspector the changes intended to be performed during the oversight cycle and the planned date of application for the change.

2.6 Changes not requiring prior approval





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The MOE may be a single document or may be supplemented by “associated” procedures/lists. Criteria to differentiate between the two options is provided in the [MOE UG.CAO.00024, “General Guidance par. 1.6 Structure of the MOE”](#).

The initial issue of the MOE/Associated procedures/lists shall be approved by the competent authority before the document can be used by the Organisation (hereinafter referred as “prior” approval).

Any subsequent amendment may be approved by the maintenance organisation through a “procedure for changes not requiring prior approval” to be included in the [MOE chapter 1.11 \(refer to MOE UG.CAO.00024-XXX\)](#).

This privilege may be granted to the organisation for certain changes to the organisation or amendments of the MOE and/or associated procedures, by delegating the approval to the Compliance Monitoring function.

The following criteria are considered when approving such procedure:

1. General principles

The MOE 1.11 “procedure for changes not requiring prior approval” shall detail which changes to the organisation or the approved procedures are not systematically approved by the competent authority. This decision is based on confidence building and the ability of the organisation’s compliance monitoring system to deal adequately with the EASA Part-145.

2. Access to and notification of revised documents

The allocated inspector needs to have access and be informed about any document amended by the maintenance organisation under the MOE 1.11 procedure, in order to have a clear picture of all the documentation which is part of the approval. This is needed for the Inspector to be in condition to control that the changes remain within the boundaries of the procedure and be satisfied that the compliance monitoring system of the maintenance organisation has adequate control over the approval of such changes. Access and notification of changes may be ensured according to one of the following options.

- **Option 1)** the revised document is provided by the Organisation using a file transfer (e.g. email, data transfer, etc.)

The organisation shall provide the allocated inspector copy of any document approved under the MOE 1.11 procedure as soon as practicable. The allocated inspector shall provide an acknowledgment receipt to exclude possible communication problems.

- **Option 2)** Continuous access is provided to the latest document through any IT system of the Organisation

The MOE chapter 1.11 shall specify the terms under which a continuous access is provided to the particular document (s) (e.g. IT system used, state that access credentials are provided to the allocated inspector, notification process).

The organisation is not required to submit copy of each revised document, however the allocated inspector shall be notified in writing on a periodic basis of maximum one year, to be specified in the MOE chapter 1.11. The allocated inspector shall provide an acknowledgment receipt to this notification, to exclude possible communication problems.

2.7 Alternative Means of Compliance (AltMoc)

The application for an AltMoc is to be submitted with an EASA Form 2. Any AltMoc shall be approved by EASA with the approval of the Exposition including the listed AltMoc in the MOE chapter 5.5 (refer to [MOE UG.CAO.00024, par. 1.12 “Procedures for alternative means of compliance”](#)).





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2.8 Exemptions according to BR art. 76(4)

EASA may grant exemptions to any legal or natural person to whom it has issued a certificate, according to art. 76(4) of Basic Regulation (EU) 2018/1139, in the situations and subject to the conditions set out in Article 71(1).

3 Continued surveillance.





3.1 Continued surveillance principles.

The following definition apply:

- **Oversight planning cycle:** is the period of time established for each maintenance organisation during which the allocated inspector must plan and perform the activities required in the oversight programme established by EASA.

The allocated inspector notifies the maintenance organisation the plan of the routine audits in order to agree on specific dates. The following has to be considered:

- Maximum support shall be provided to the allocated inspector in order to accommodate the proposed audit dates, with particular reference to on-site audit. This will allow the allocated inspector to perform an efficient planning and cost and time management.;
- When the Organisation is not supportive in accepting audit dates, the allocated inspector will inform the EASA MOC for further actions;

EASA will take actions to suspend or limit in whole or in part an organisation if unforeseeable circumstances outside the control of the EASA prevent its inspectors from performing the tasks necessary to discharge their oversight responsibilities over the oversight planning cycle.

3.1.1 Frequency of visits and number of auditors.

As per EASA Part-145, the approval is issued for an unlimited duration. Each maintenance organisation is subject to the oversight programme established by EASA, which is translated in the oversight plan defined by the allocated inspector.

The oversight starts the date the initial certificate was granted or from the last continuation date.

The number of surveillance audits as well as the number of auditors may be adapted by the EASA CAO Section depending from the outcome of an assessment, which particularly considers the following factors:

- Size/Complexity/locations of the maintenance organisation approval and use of EASA privileges, overall defining the intrinsic risks of the organisation's activity;
- Performance of the organisation and related risks, which depends from the results of the past oversight, the level of implementation and effectiveness of the safety management system, including the maturity of both the compliance monitoring function and the internal reporting system,
- Stability of the organization in terms of number and frequency of change applications, in particular related to management changes, etc.;
- Country risk factor, which consider the particular environment in which the organization is located.

It should be noted that an audit for change does not replace an intermediate audit but both may be combined to limit the travel costs for the maintenance organisation.

Moreover EASA may require additional audit(s) for the following reasons:

- weaknesses when formerly dealing with serious and / or numerous findings;
- difficulties to close former findings within the expected time frame;
- frequent changes of his management personnel which could jeopardize the maintenance organisation stability;
- incident, occurrences or other events which generate safety concerns.

EASA may also perform unannounced audits at any time to the organisation. These unannounced audits may be performed by the allocated inspector or by any other inspector designated by EASA CAO section.





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3.1.2 Allocation of the investigation team.

By default the continued surveillance of an approval is performed by the [inspector\(s\) allocated](#) during the initial investigation or the previous surveillance cycle.

The CAO Section may decide to allocate another inspector and inform the maintenance organisation in writing. In case of permanent change of the allocated inspector, the EASA Applicant Services Department will submit a formal communication to the maintenance organisation regarding the change of allocation.

A rotation policy is in place to change the allocated inspector at specified interval, which is typically 5 years.





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3.2 Technical investigation.

3.2.1 Audit report

The technical investigation process for a continued surveillance is identical to the initial process described in the chapter “technical investigation for initial approval” of this user guide. However the followings peculiar points shall be considered:

- all findings shall be classified with a level in accordance with EASA Part-145.B.350;
- during a continued surveillance audit, the allocated inspector may also include observations as detailed in paragraph 3.2.1 of this User Guide.
- After each audit, the allocated inspector will provide the maintenance organisation with an audit report, except in case a level 1 finding is identified, in such a case, the inspector will not provide a draft report to the maintenance organisation.

The process to manage the level 1 and level 2 findings is described in the following paragraphs.

The formal notification of the findings must be sent to the maintenance organisation within a maximum of 15 calendar days from the end of the audit.

Note: Should the intermediate audit lead to NIL finding, a formal notification is however to be sent to the maintenance organisation.

Approvals
in OMS

The audit report is generated by the system and the findings notified with an electronic workflow to the maintenance organisation. At any time, the system allows to verify if a workflow is under the responsibility of the inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

3.2.2 Level 1 finding.

In the particular case of level 1 finding, the allocated inspector shall not transmit any audit report to the maintenance organisation. The allocated inspector shall liaise with EASA to confirm the level 1 finding.

When the level 1 finding is confirmed, EASA will formally notify the audit report notify to the maintenance organisation together with the decision against the approval in line with 145.B.350 and 145.B.355

It is the responsibility of the maintenance organisation to take the appropriate and immediate corrective action as specified in the chapter “Limitation, Suspension and revocation” of this User guide.

3.2.3 Level 2 finding.

Level 2 findings are notified to the maintenance organisation directly by the allocated inspector.

The corrective action period granted by the allocated inspector depends on the nature and the gravity of the finding. In any case the initial due date cannot be more than three months.

The maintenance organisation shall provide the allocated inspector:

- within 15 days after the receipt of the finding notification or within the finding due date, whichever is the earlier date: an acknowledgement of the findings, a high level action plan and confirmation that a root cause analysis has been started together with the associated proposed timescales.





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- Corrective action evidences as per the agreed corrective action plan and in any case in advance of the finding due date to allow the review by the **allocated** inspector within the finding due date.

Findings made during the surveillance cycle will be handled by the **allocated** inspector in accordance Section B of EASA Part-145 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

Should the maintenance organisation need an extension of the initial due date agreed for a finding, such an extension cannot exceed three additional months and shall be justified and requested in writing to the **allocated** inspector. Such a justification shall consist in a corrective action plan detailing the corrective action(s) with the associated time frame and the intermediate actions as necessary. The **allocated** inspector shall notify his/her decision to the maintenance organisation. **It is to be noted that findings extensions is not systematically granted, depending from the nature of the finding..**

When the maintenance organisation fails to submit an acceptable corrective action plan or to meet the timescales specified for Level 2 findings, EASA will be forced to escalate the finding to level 1 and take actions on the approval.

Approvals
in OMS

All the actions related to findings management (including root cause analysis and corrective action report) are carried out directly in the IT tool by the maintenance organisation

3.2.4 Observation.

The **allocated** inspector may decide to rise observations as per 145.B.350(f). For each observation notified, the organisation should analyse the related issues and determine when actions are needed. The handling of the observations may follow a process similar to the handling of the findings by the organisation. The organisation should record the analysis and the outputs, such as the actions taken or the reasons for not taking actions.

It is expected that observations are given due consideration by the organization, with particular reference to those which indicate that performance is not effective or where potential exists to cause a non-compliance.

Approvals in OMS

Observation can be recorded in the OMS as part of the audit.
For each observation notified by the competent authority, the organisation should analyse the related issues and determine when actions are needed. The OMS correction action process can be followed to record the result of this assessment by the organisation, including cases where no actions are taken.

3.2.5 Corrective action.

To be acceptable a proposed corrective action shall address at least the following issues for each finding:

- The results of the root cause(s) analysis cause(s);
- Corrective action based upon the identified root cause(s) which shall detail:
 - Immediate or short term corrective action;
 - Long term corrective action preventing reoccurrence of such non- conformity.





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The implementation of the whole corrective action shall not exceed the time frame imposed by EASA to close the finding. This implies that the **allocated** inspector has received the agreed corrective actions and the relevant evidence² with enough anticipation to review them as necessary and to formally close the related findings at the due date (e.g.: 21 days in advance for a finding due date set up at 3 months).

Note: A voluntary reduction of the scope of approval cannot be systematically considered as an appropriate corrective action to a finding.

3.2.6 Closure.

When the **Allocated** inspector is satisfied with the corrective actions that have been proposed by the maintenance organisation in respect of level 2 finding(s) raised during the audit, he/she notifies in writing the maintenance organisation that the proposed corrective actions are considered to be acceptable.

However, the acceptance of a corrective action may require a **further follow-up** audit by the **allocated** inspector prior to formal closure of the related finding.

The closure of an audit report requires the closure of each finding included in that report.

The closure of an audit report which includes at least one level 1 finding shall be done according to the chapter re-statement of this user guide.

Approvals
in OMS

Findings closure is managed in the system and organisations receive automatic notification of closure

3.2.7 Occurrence Report

As part of the continued surveillance, the maintenance organisation may be requested by the **allocated** inspector to investigate occurrence reports. Such reports may have been received by EASA either from the maintenance organisation itself (according to the MOE 2.18 procedure to report occurrences to the competent authority) or from a third party (i.e. customer operator, manufacturer, etc.).

Such cases, where a further investigation is requested to the maintenance organisation, are limited to those occurrences which are pre-assessed by EASA as being related to an already established or potential responsibility of the specific maintenance organisation.

The maintenance organisation is required to provide an investigation report detailing the analysis of the event, conclusions and where applicable preventive and corrective actions to avoid reoccurrence.

The level of involvement of the **allocated** inspector in this process (i.e. **type of audit**) may depend on the result of the investigation conducted by the maintenance organisation and the potential safety impact of the event occurred.

3.3 Continuation of approval.

At the end of each **oversight planning** cycle, the approval needs to be continued according to 145.B.305 provision. The continuation of an approval is a process not requiring any application from the approval holder and it is entirely managed by EASA with the support of the **allocated** inspector. As a consequence, considering that the approval is valid

² Promises, drafts, statements, wishes, hopes, plans, etc. cannot be accepted as evidence.





for an unlimited duration, EASA is not issuing any formal continuation communication to the relevant maintenance organisation.

3.3.1 Recommendation for continuation.

At the end of the oversight cycle, the allocated inspector will have to summarize the surveillance performed and if satisfied, will recommend EASA to continue the approval (continuation of the approval). For that purpose he/she will prepare a recommendation EASA Form 6 and a oversight plan for the new period. The oversight plan may be sent by the allocated inspector to the maintenance organisation upon request.

At the time of the continuation recommendation, recent level 2 findings having not reached yet the deadline may be still open. In this case the maintenance organisation must provide the allocated inspector with an acceptable corrective action plan for those findings that are still open.

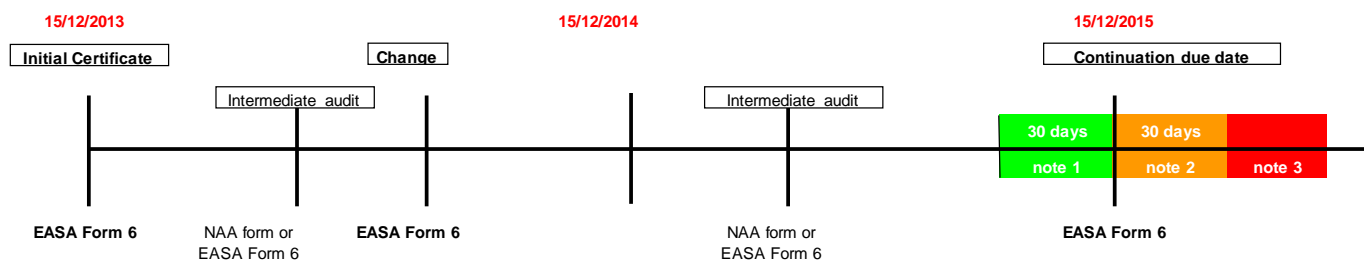
The formal corrective action plan must be formally accepted by the allocated inspector.

Findings made during the surveillance cycle will be handled by the allocated inspector in accordance with Section B of EASA Part-145 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

Approvals in OMS

The oversight plan is replaced by a phase planning concept. The phase represents the oversight planning cycle. When the previous phase is closed a new one is created. Within a phase it is possible to visualize (depending from access rights) all activity conducted (e.g. changes, surveillance audit, etc.).

3.3.2 Time frame.



- note 1 : the recommendation EASA Form 6 should not be dated more than 30 days BEFORE the due date.
- note 2 : the recommendation EASA Form 6 should not be dated more than 30 days AFTER the due date.
- note 3: in case of "force majeure", a documented extension request is to be sent to EASA

3.4 Shared audit

Taking into consideration that the oversight of the Foreign AMOs is carried out by different entities being EASA/NAAs/QE inspectors, the need exist for EASA as the competent authority to have a system in place which enables verification of areas which cannot be observed on a desktop basis during the review of the recommendation reports. This system is identified with the shared audit exercise.

The Shared Audit is defined as an audit carried out by an EASA designated inspector together with the EASA/NAAs/QE allocated Team Leader who is in charge for the oversight of the AMO.





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4 Surrender of an approval.





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4.1 Notification to EASA.

If the maintenance organisation intends to surrender the EASA Part-145 approval, the EASA Form 2 shall be submitted to EASA and completed as per EASA Form 2 filling instruction for surrender.

4.2 EASA confirmation.

Based upon the EASA Form 2, EASA will formally notify the maintenance approval holder about the surrender of its maintenance approval.

At the same time, EASA Financial department will process any outstanding payment /recovery according the current fees and charges Regulation. In addition, any fee not consumed will be reimbursed.

4.3 Maintenance organisation obligations.

According to 145.A.55(a).4 where an organisation approved under EASA Part 145 terminates its operation, all retained maintenance records covering the last three years shall be distributed to the last owner or customer of the respective aircraft or component.

In addition, according to 145.A.90(b), the approval shall be returned to EASA.





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5 Limitation, Suspension and Revocation of an approval.





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5.1 *Legal basis.*

EASA is the competent authority for Foreign EASA Part-145 approvals and as such shall:

- suspend a certificate when it considers that there are reasonable grounds that such action is necessary to prevent a credible threat to aircraft safety;
- suspend, revoke or limit a certificate if such action is required pursuant to point 145.B.350. In particular, EASA will revoke, limit or suspend the EASA Part-145 Approval in whole or in part:
 - depending upon the extent of significant non-compliances (level 1 finding⁴), until successful corrective action has been taken by the maintenance organisation;
 - in case the organisation fails to submit an acceptable corrective action plan, or fails to perform the corrective action within the time period accepted or extended by the competent authority
- suspend or limit in whole or in part a certificate if unforeseeable circumstances outside the control of the competent authority prevent its inspectors from discharging their oversight responsibilities over the oversight planning cycle;

A limitation of an approval means that the competent authority imposes restrictions to the privileges held by the maintenance organisation without impact on to the certificate.

A suspension of an approval means that the competent authority removes partially or in whole the ratings endorsed on the certificate and the MOE.

Revocation means that the approval granted to the maintenance organisation is removed in whole and definitively.

5.2 *Notification of EASA decision.*

Based upon a recommendation to limit, suspend or revoke the approval of an organisation, the EASA Head of Maintenance and Production Department in coordination with the EASA [CAOA Section](#) Manager and the EASA MOC will make a decision in relation to the approval and formally notify the maintenance approval holder about:

- The EASA decision to the limit, suspend or revoke the EASA maintenance organisation approval;
- The audit report (EASA Form 6 Part 4) showing the confirmed level 1 and the possible level 2 finding(s);
- A time frame for the maintenance organisation to provide EASA with:
 - An acceptable corrective action plan (CAP) for the level 2 findings⁵ referenced in the audit report (EASA Form 6 Part 4);
 - Evidence that additional measure(s) required by EASA have been taken by the maintenance approval holder;

⁴ Refer to [145.B.350\(b\)](#) for the definition of level 1 finding

⁵ A level 2 finding is any non-compliance with the EASA Part-145 requirements which could lower the safety standard and possibly hazard the flight safety.





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5.3 Organisation action and response.

The maintenance organisation is expected to:

- acknowledge receipt of the letter by return of mail, confirming that the maintenance organisation has put in place the restrictions required by EASA;
- take immediate corrective action to the level 1 finding(s) based upon the results of the root cause analysis and inform EASA accordingly;
- identify the EASA Part-145 maintenance release certificates signed that are relevant to the significant non-compliance (aircraft / engine / part / component);
- to ensure - when necessary - that additional maintenance or re-certification of all affected products is accomplished;
- to inform the relevant customer and the associated competent authority – when necessary- about the significant non-compliance and the results of the associated non-compliance investigation;
- to provide the EASA with an acceptable corrective action plan (CAP) for the level 2 findings referenced in the audit report (EASA Form 6 Part 4) within the defined time frame. This CAP can include the long term corrective action related to the level 1 finding(s).

Where the maintenance organisation fails to comply with any of the above mentioned requirements, EASA could revoke the EASA maintenance organisation approval.

In case of revocation of an approval, the organisation shall immediately send the original certificate back to EASA.

Note: During the suspension phase the [allocated](#) inspector remains the contact point for the maintenance organisation and all exchanges must be addressed to him/her. The EASA MOC shall be copied with any messages related to the points addressed above.





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6 Approval Re-instatement.





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When a certificate is revoked, similarly to when an approval is surrendered, the organisation has the option to start an application for a new Part-145 approval.

As a consequence, this chapter applies only to suspended or limited approvals.

The maintenance approval holder must take action as mentioned in the in chapter “organisation action and response” of this user guide. When the corrective action plan is acceptable to EASA the organisation must start the implementation of the proposed immediate and long term corrective actions to the findings.

- Once the implementation process (including those related to the level 1 finding) is fully completed, the maintenance organisation’s Compliance Monitoring function shall audit the organisation in full for compliance with Part-145 regulation “as amended”. Before the re-instatement audit takes place, a statement signed by the maintenance organisation Compliance Monitoring Manager shall always be provided, confirming the effective implementation of the proposed corrective actions. The relevant audit report shall be provided by the maintenance organisation to the allocated inspector.
- Once the inspector is satisfied with the actions that have been taken by the maintenance organisation in respect to each finding raised and once he/she has received the statement signed by the organisation Compliance Monitoring Manager he/she liaises with the maintenance organisation and the EASA MOC for scheduling the audit.
- In addition to the allocated inspector , the CAO Section Manager may select an EASA representative who will take part in the re-instatement audit (shared audit).
- During the reinstatement audit, the audit team will review all applicable requirements and MOE chapters (depending if the reinstatement follows a limitation, partial suspension or full suspension), similarly to an initial audit. Once compliance of the maintenance organisation with EASA Part-145 has been established during the audit, the allocated inspector will recommend the EASA maintenance organisation approval re-instatement. This might include the recommendation for the approval of a MOE revision.
- Based upon this recommendation for re-instatement, the EASA will formally notify the re-instatement to the maintenance organisation.

Note: During the suspension phase and at the time of the re-instatement audit the EASA will not accept any application for change related to the extension of the scope of approval. However, other changes including reduction of the scope could be considered.

Approvals in OMS

Following a satisfactory reinstatement recommendation the status of the approval returns in the system to “valid” and the organization can start at this point to exercise the Part-145 privileges. Formal re-instatement notification to the applicant is not needed, unless as part of the reinstatement additional changes apply which require to reissue the approval certificate, or approve the exposition or associated procedures/lists.





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7 Publication of the EASA Part-145 approvals list

A list of all the EASA approvals with related status is published on the EASA website.

Approvals in
OMS

The list published in the EASA website is generated directly from a source file created in the system, which ensure the information published on the website is reliable, and updated on recurrent basis reflecting changes of the approvals status.

This is particularly the case, when issuing a new approval, or when an approval is surrendered, limited, suspended, revoked.

