



Foreign Part-145 approvals Definition of maintenance organisation's staff number	Doc # Approval Date	UG.CAO.00120-004 11/11/2022
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Foreign Part-145 approvals – Definition of maintenance organisation's staff number

UG.CAO.00120-004

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DOCUMENT CONTROL SHEET**Reference documents****a) Contextual documents**

Applicable requirements are listed in the form "FO.CAO.00136-XXX - Foreign Part-145 approvals – Documentation Index".

b) Internal documents

Applicable document are listed in the form "FO.CAO.00136-XXX - Foreign Part-145 approvals – Documentation Index".

Log of issues

Issue	Issue date	Change description
001	13/11/2013	First issue. This document is aimed to provide the applicant with guidance material supporting the application/approval, and as such has been reviewed by Rulemaking Product Support Continuing Airworthiness Section (R.4.2).
002	01/09/2014	Update of Quality documents to implement the new corporate image of the Agency and the changes to the organization structure.
003	31/08/2015	Endorsement of comments received from stakeholders.
004	11/11/2022	Endorsement of Regulation (EU) 2021/1963 introducing SMS





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0. Introduction.





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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 AVIATION SAFETY AGENCY
EU	EUROPEAN UNION
GM	GUIDANCE MATERIAL
ILAC	INTERNATIONAL LABORATORY ACCREDITATION COOPERATION
IOIRS	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
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 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.

This user guide is designed to be used by maintenance organisations and the [Allocated inspector](#) when:

- the maintenance organisation is:
 - Defining the staff number to be declared in the [MOE chapter 1.7](#) and in the Form 2 when applying for an EASA approval;
 - Demonstrating that sufficient staff to plan, perform, supervise, inspect and monitor the maintenance organisation is available in accordance with the approval {adequate resources to justify the grant of approval as defined in paragraphs 1.8 (facilities to be approved) and 1.9 (scope of work)}.
- [allocated inspector](#) is checking that:
 - sufficient staff to plan, perform, supervise, inspect and monitor the maintenance organisation is available in accordance with the approval;
 - The staff number declared in the Form 2 is consistent with the EASA Part-145 requirements at the time of the audit.

0.5. Entry into force

This User Guide is applicable on 2 December 2022, after publication on the EASA website and it is immediately in force for any Organisation undergoing an initial investigation process and for all cases where the approval is invalid (i.e. limited or suspended).

For organisations holding a valid approval, the MOE User Guide revision UG.CAO.00024-008 can still be used for any change to the MOE during the transition period of Regulation (EU) 2021/1963. However, a revised MOE in compliance with UG.CAO.00024-009 (thereby implementing SMS in the Part-145 Organisation) is expected to be submitted as part of the SMS application package within 2 December 2023.

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 procedure.

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





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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. Communications

All documents and correspondences between the maintenance organisation, the allocated NAA/QE and EASA shall be in the English language unless otherwise agreed by EASA.





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1. Category of personnel to be considered





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1.1. Management personnel.

The maintenance organisation shall appoint an Accountable Manager and nominate a group of persons which shall represent the maintenance management structure. Dependent upon the size of the maintenance organisation and the extent of approval, all EASA Part-145 functions/responsibilities, could be subdivided under individual managers or combined in any number of ways:

- Line Maintenance manager;
- Base Maintenance Manager;
- Workshop Manager;
- [Compliance Monitoring Manager](#);
- [Safety Manager](#);
- [NDT RL3](#)

Further guidance on the maintenance management structure, refer to [WI.CAO.00115-XXX "Management Personnel"](#).

1.2. Technical support staff.

Technical support staffs to be considered are the ones who are involved in the process of:

- planning the maintenance activities (planners);
- planning the availabilities of the means to perform the work (including availability of the hangar, ground support equipment, etc.);
- keeping maintenance data available and up to date (librarians);
- preparing the relevant work packages (engineers);
- archiving of all maintenance records (technical record staff).

In addition, where a maintenance organisation is using its own job cards, the personnel who transpose the maintenance data (AMM, AD, SB) into maintenance tasks or who analyse and report inaccurate/ambiguous data, shall be considered as well as technical support staff.

1.3. [Safety management/compliance monitoring](#) staff.

The [safety management/compliance monitoring](#) system staff number shall include every person [employed or contracted by the organisation](#) who is involved in:

- the safety policy;
- the maintenance organisation procedures issuance and revision;
- the [compliance monitoring system](#)¹
- feedback reporting (requesting remedial actions);
- [Occurrence reporting and investigation](#);





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- SMS implementation/[management system](#)

1.4. Certifying staff.

Certifying staff number shall include every person who is authorised by the maintenance organisation (MOE § 3.9) to release [maintenance performed on](#) an Aircraft / an aircraft component to service.

The following types of certifying staff must be included:

- aircraft certifying staff: all staff that hold a company authorisation which authorises the holder to release [maintenance performed on](#) an A/C to service within the A1 to A3 rating. [All the](#) different categories of certifying staff must be considered.
- engine & APU certifying staff: all staff that hold a company authorisation which authorises the holder to release [maintenance performed on](#) an engine or APU to service within the B1 to B3 rating;
- component certifying staff: all staff that hold a company authorisation which authorises the holder to release [maintenance performed on](#) a component to service within the C1 to C20 rating;
- specialized Services certifying staff: all staff that hold a company authorisation which authorised the holder to release a specialized service performed on A/C, engine, APU or component to service within the D1 rating;
- every commander, flight engineer who is authorised by the maintenance organisation to carry out and certify tasks.

1.5. Support staff.

Support Staff (S/S) means staff authorised by the maintenance organisation to support the Category "C" certifying staff in managing and releasing the A/C to service after base maintenance activity while not necessarily holding certification privileges.

Support Staff shall ensure that all relevant tasks or inspections have been carried out to the required standard before the category C certifying staff issues the certificate of release to service.

1.6. Maintenance technical staff other than Certifying Staff.

Maintenance Technical staff number shall include every person who is authorised by the maintenance organisation (MOE § 3.11, 3.13, 3.14) to perform, attest (sign-off) or inspect any maintenance carried out on an Aircraft, an engine or APU or an aircraft component according to approved data under the EASA Part-145 approval Technical staffs which have to be considered are those acting within the approved ratings [Ax](#), [Bx](#), [Cx](#), [D1](#), such as but not limited to:

- Aircraft maintenance [Mechanics/Inspectors](#) (i.e mechanic, avionic, cabin, etc.);
- Component/engines/APU maintenance [Mechanics/Inspectors](#);
- [Specialised activities](#) (NDT, welding, cleaning, machining, etc.);





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- Supervisors

1.7. Store and purchasing department staff.

Store and purchasing department staff number shall include every person who makes available to the maintenance organisation the parts, components, tools and consumables:

- Store keepers;
- [receiving inspection personnel](#);
- Procurement staff (staff in charge to place purchasing orders to any sources internally or externally).

1.8. Training staff.

Training staff number shall include every person who is responsible for providing training related services on behalf of the maintenance organisation such as but not limited to:

- recurrent [training programme](#);
- [safety training \(including human factor\)](#);
- EASA Part-145/aviation legislation/EWIS/FTS.

1.9. Contracted staff.

Contracted staff to be considered are all external staff who are not directly / permanently employed by the maintenance organisation and who are involved in the maintenance activities. Only the long term contracted staff need to be considered under this chapter for the purpose of defining the organization's staff number. This does not release the maintenance organisation from complying with the relevant requirements also when using contracted staff for short term periods.





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2. Criteria to be considered.





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2.1. Scope of activity.

The maintenance organisation shall have sufficient staff according the approved scope of work. This means that the following criteria shall be considered:

- the size of the maintenance organisation;
- the extent of the requested/approved scope;
- number of sites (headquarter, main bases, line stations, engine and component shops);
- number of line/base maintenance contracts;
- the variety of the capability list;
- number of EASA Form 1 releases;

2.2. Production planning.

Production planning, shall take into account [fatigue](#), the total amount of lines of product to be managed at the same time, and be used to compare the adequacy between the work load and the man hour availability during maintenance activities. In addition, man-hour planning shall show that the maintenance organisation has sufficient staff to plan, perform, supervise, inspect and monitor the maintenance organisation based on the approved scope of work.

2.3. Staff number variation requiring an EASA Form 2 for change

Reduction or increase of the staff number when the variation:

- is more than 10% of the total staff number declared in [the MOE 1.7](#) (i.e. Reduction of 11 staff when the staff to maintain the EASA approval was 100) or;
- is impacting the fees to be paid to EASA, or
- is affecting the approval (i.e. All certifying staff for a certain aircraft type approved under A1 rating leave the maintenance organisation);

Note: permanent and contracted staff shall be considered.





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3. Summary table.





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	Categories	Sub categories	Total by Sub categories	Total
1.1	Management personnel	Accountable Manager		
		Compliance Monitoring Manager		
		Safety Manager		
		Line Maintenance Manager		
		Base Maintenance Manager		
		Workshop Manager		
		Responsible NDT Lev. 3		
1.2	Technical support Staff	Planners		
		Librarians		
		Engineers		
		Technical record staff		
1.3	Compliance Monitoring/Safety Management Staff	Safety Policy		
		Maintenance procedure		
		Compliance Monitoring		
		Safety Management		
1.4	Certifying Staff	Aircraft "A" Category		
		Aircraft "B1" Category		
		Aircraft "B2" Category		
		Aircraft "B3" Category		
		Aircraft "C" Category		
		Engine & APU		
		Component		
		Specialized Services		
		Commander or flight engineer holding a limited certification authorisation		
1.5	B1 and B2 Support staff for base maintenance	"B1" Support Staff		
		"B2" Support Staff		
1.6	Maintenance Technical Staff	Aircraft		
		Engine & APU		
		Component		
		Specialized service		
1.6.1	Store and Purchasing staff			
1.6.2	Training staff			
1.6.3	Certifying staff IAW 145.A.30(g)			
1.6.4	Contracted staff			
Total :				

