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| Foreign Part-145 approvals | Doc # | UG.CAO.00128-004 |
| Demonstration of 6/24 months maintenance experience | Approval Date | 10/11/2022 |

Foreign Part-145 approvals - Demonstration of 6/24 months maintenance experience

UG.CAO.00128-004

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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 | 22/10/2015 | Endorsement of comments received from stakeholders |
| 004 | 10/11/2022 | <ul style="list-style-type: none"> • Specific guidance provided for NDT CS • 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 |
| 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 |
| IOSRS | 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 | OVERSUGHT 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 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 maintenance organisations and the Assigned inspector when:

- The maintenance organisation is:
 - Establishing procedures for compliance to the requirement of having **all** Certifying Staff (C/S)¹ and/or base maintenance Support Staff (S/S) involved in at least 6 months of actual relevant aircraft or component maintenance experience in any consecutive 2-year period.
- Assigned inspector is :
 - Evaluating the compliance of the maintenance organisation to the requirement of having **all** Certifying Staff (C/S) and/or base maintenance Support Staff (S/S) involved in at least 6 months of actual relevant aircraft or component maintenance experience in any consecutive 2-year period.

0.5. Entry into force

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

0.6. Associated user guides

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 available on the EASA Web site 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 organisations, the overseeing authority and EASA shall be in the English language unless otherwise agreed by EASA.

¹ Certifying staff means Aircraft, engine, component and NDT certifying staff





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1. Requirements.





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1.1. Applicable requirement 145.A.35 (c).

The maintenance organisation shall ensure that all certifying staff (C/S) and base maintenance support staff (S/S) are involved in at least six months of actual relevant aircraft or component maintenance experience² in any consecutive two year period.

1.2. Maintenance Organisation Exposition.

The maintenance organisation, is required to detail in the MOE chapter 3.9 (refer to the “Foreign Part-145 approvals – User Guide for MOE”, UG.CAO.00024-XXX), a procedure describing how the C/S and S/S shall demonstrate the compliance with the above requirement and how the control of this requirement is ensured.

This procedure shall be:

- established for:
 - issuing an initial individual EASA Part-145 C/S - S/S individual authorisation;
 - renewing an individual EASA Part-145 C/S - S/S individual authorisation.
- met by any holder of an EASA Part-145 C/S - S/S individual authorisation issued under any rating, as applicable depending on the scope of approval hold by the maintenance organisation and in particular for:
 - A rating (A1, A2, A3 or A4), Aircraft certifying staff and/or support staff;
 - C rating (from C1 to C22), Components certifying staff;
 - B rating (B1, B2 or B3), Engines, APU certifying staff;
 - D1 rating (any NDT method), specialised services certifying staff.
- Compliant with the duration and nature of experience criteria detailed below.

² "involved in actual relevant aircraft or component maintenance" means that the person has worked in an aircraft or component maintenance environment and has either exercised the privileges of the certification authorisation and/or has actually carried out maintenance on at least some of the aircraft type or aircraft group systems specified in the particular certification authorisation





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2. Definition of experience





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The 6 months maintenance experience in 2 years shall be understood as consisting of two elements, **duration** and **nature** of the experience. The minimum to meet the requirements for these elements may vary depending on the size and complexity of the aircraft /engine/component and type of operation and maintenance.

The experience acquired/recorded on a specific aircraft/component/engine/APU type may also be used to demonstrate having or maintaining the experience on a similar aircraft/component/engine/APU type. When the EASA Part-145 AMO intends to use the privilege of “similar aircraft/component/engine/APU” for the demonstration of the 6/24 months requirement, the MOE chapter 3.9 shall include, as applicable, definitions of similar⁴ aircraft/engines/components/APUs types relevant to the scope of work hold by the maintenance organisation, (refer to the “Foreign Part-145 approvals – User Guide for MOE”, UG.CAO.00024-XXX).

For NDT C/S refer to the “NDT User Guide”, UG.CAO.00161-XXX for additional guidance.

The experience shall be gained in an EASA Part-145 AMO. However, experience gained on a similar A/C, Engine, component technology in a non-EU environment may be used.

2.1. Duration.

C/S and/or S/S shall demonstrate to have acquired within a maintenance organisation, in any consecutive 2-year period:

- 6 months working with the same maintenance organisation; or
- 6 months split up into different blocks, working within the same or in different maintenance organisations.

2.2. Nature.

C/S and/or S/S shall demonstrate maintenance **activity** performed (and/or supervised and/or released to service), within an approved maintenance organization, on a comprehensive combination of different **tasks types** (i.e. Servicing, inspection, troubleshooting, repairing, modifying, removal/installation, etc.).

⁴ Definition of “similar” aircraft/engines/components/APUs need to be agreed with the allocated inspector by inclusion in the MOE





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3. Acceptable experience.





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3.1. Duration.

A recording of a total of 180 tasks at different dates in the 2 years period would be the minimum expected record to demonstrate the “duration” requirement (but not necessarily the “nature of experience” requirement, which shall meet the criteria of the following chapter). The 180 tasks may be replaced by a record of 100 working days of maintenance experience in accordance with the privileges. In this case each recorded day is intended to be a full working day, which for example means for base maintenance activity around 7/8 working hours per day. The duration should be recorded in days or half-days.

A person may have at the same time one or more EASA Part-145 C/S - S/S individual authorisation (i.e. being B1 aircraft C/S on 3 different A/C types, or being at the same time C6 and C14 C/S on different components P/N, etc.). He/she will have to record a minimum of 180 tasks (or 100 working days), regardless the number/types of EASA Part-145 C/S - S/S individual authorisation hold.

For any Ax, Bx, Cx and D1 rating, a maximum of 20% of the required experience duration, may be replaced by the following activities when relevant to the scope of the EASA Part-145 C/S - S/S individual authorisation:

- Maintenance training as an instructor/assessor;
- Maintenance technical support/engineering;
- Maintenance management/planning.

Having recorded 180 tasks or 100 days only during the first year of the 2-year period cannot be considered as acceptable. The experience shall be spread over the period to avoid a too long interval without activity.

In order to demonstrate compliance of the above requirements, the maintenance organisation’s [compliance monitoring](#) system is requested to issue a document or to have an electronic system in place (refer to chapter [4.1](#)) where the **number of performed tasks (or working days)** shall be summarised and recorded for each C/S and/or S/S.

3.2. Nature.

The activities considered relevant for maintenance experience, as applicable to the EASA Part-145 C/S - S/S individual authorisation hold, are functional/operational test, service and ground handling, removal/installation, minimum equipment list, trouble shooting, modification, repair and inspection.

The tasks recorded need to be representative of the nature of the experience by:

- being related to a combination of activities which is appropriate to the individual authorisation hold (i.e. only records of service and ground handling for an aircraft B1 C/S in not acceptable, etc.)
- being representative of each of the EASA Part-145 C/S - S/S individual authorisations hold according to the criteria stated in the following chapter.
- being not limited to simple tasks (i.e. a bulb replacement for an aircraft B2 C/S or wheel exchange for an aircraft B1 C/S, [standardisation of equipment or system performance checks for NDT C/S](#), etc.).
- In addition, having recorded a majority of identical tasks or tasks not covering the overall individual authorisation privileges cannot be considered as acceptable. For instance, a Component C/S authorised to release under the C14 rating wheels, brakes and landing gears, should demonstrate experience on wheels, brakes and landing gears to keep the full C14 scope of authorisation





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In order to demonstrate compliance of the above requirements, the maintenance organisation's [compliance monitoring](#) system is requested to issue a document or to have an electronic system in place (refer to chapter 4.1") where the **type of activity/ tasks** shall be summarised and recorded for each C/S and/or S/S.

3.2.1. Aircraft certifying staff and/or support staff

The following specific criteria, shall be considered to identify an acceptable "nature of experience":

- For category A, the experience shall include exercising the privileges, by means of performing tasks related to the authorisation (hold or intended to be granted) on at least one aircraft type for each subcategory (i.e. A1, A2, A3, A4). This means tasks as mentioned in AMC 145.A.30(g), including servicing, component changes and simple defect rectifications;
- For category B1, B2 and B3, for every aircraft type rating included in the authorisation (hold or intended to be granted), the experience shall be on that particular aircraft or on a "similar aircraft" within the same subcategory (i.e. B1.1, B1.2, B1.3, B1.4);
- In order to ensure the experience is representative of the B2 qualification when granting an initial authorization to B2 category, only the avionics/electrical tasks that cannot be done by a B1 (e.g replacing bulbs and lights) should be recorded as B2.
- For category C, the experience shall cover at least one of the aircraft type endorsed in the authorisation (hold or intended to be granted);
- For a combination of categories (i.e. B1.1 + B2, B1.1 + C, etc.), the experience shall include some activities in each category (hold or intended to be granted).
- When the organisation is using the privilege of "similar aircraft" as described in chapter 2 of this user guide a minimum of 30% of the experience duration (tasks or working days as applicable) needs to be recorded for each group of similar aircraft identified in the MOE [3.9](#).

3.2.2. Components, engines, specialised services certifying staff.

The following specific criteria, shall be taken into account, to identify an acceptable nature of experience:

- Cx rating (from C1 to C22), Components certifying staff: the experience shall include exercising the privileges, by means of performing tasks or exercising the certification privileges of the authorization on each of the C rating authorised/intended to be authorised;
- Bx rating (B1, B2 or B3), Engines certifying staff: the experience shall include exercising the privileges, by means of performing tasks or exercising the certification privileges of the authorization on each of the B rating authorised/intended to be authorised;
- D1 rating (any NDT method), Specialised services certifying staff: the experience shall include exercising the privileges, by means of performing tasks of the authorization on the NDT methods authorised/intended to be authorised.





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- When the organisation is using the privilege of “similar component/Engine/APU” as described in chapter 2 of this user guide a minimum of 30% of the experience duration (tasks or working days as applicable) needs to be recorded for each group of similar component/engine/APU identified in the MOE 3.9.

3.3. Credit of experience.

For an initial EASA Part-145 C/S - S/S individual authorisation, the following credit of experience requirements may be considered:

- For Ax rating C/S and S/S: having passed a type training (theoretical and practical) in an approved EASA Part-147 organisation within the year preceding the issue of the EASA Part-145 C/S-S/S individual authorisation supersedes the need for demonstration of 6/24 months maintenance experience on the specific aircraft type plus any other similar aircraft A/C;
- For Cx rating CC/S: having passed a component training as detailed in the current User guide “Foreign Part-145 approvals – Components engines and APU certifying staff”, UG.CAO.00126-XXX within the year preceding the issue of the EASA Part-145 C/S individual authorisation supersedes the need for Demonstration of 6/24 months maintenance experience for this particular component or a component from the same family and same technology;
- For Bx rating CC/S: having passed an engine/APU training as detailed in the current User guide “Foreign Part-145 approvals – Components engines and APU certifying staff” UG.CAO.00126-XXX within the year preceding the issue or of the EASA Part-145 C/S individual authorisation supersedes the need for demonstration of 6/24 months maintenance experience for this particular engine/APU or an engine/APU from the same family and same technology.
- For D1 rating C/S: having passed a training and examination for an NDT method as detailed in the EN 4179, within the year preceding the issue of the EASA Part-145 C/S individual authorisation supersedes the need, for demonstration of 6/24 months maintenance experience for this particular method to be added to the EASA Part-145 C/S individual authorisation.

3.4. Lack of recent experience demonstration/record.

In the case it is not possible to demonstrate by records the duration and/or nature of experience according to the criteria established in this user guide, the EASA Part-145 C/S - S/S individual authorisation cannot be granted or renewed, unless the candidate C/S and/or S/S:

- (a) Acquires the missing elements of duration (i.e. missing number or tasks or missing days) and/or nature (i.e. missing T/S or MEL tasks for a B1 aircraft maintenance certifying staff, missing tasks on landing gears maintenance for C14 C/S, etc.) of experience. If the EASA Part-145 AMO is unable to provide this possibility due to missing workload/activity, it may be acceptable that the person completes such missing elements. The missing elements may be completed by the EASA Part-145 AMO issuing/renewing the EASA Part-145 C/S - S/S individual authorisation, at another EASA Part-145 AMO, or at a maintenance organisation not having EASA Part-145 approval;
- (b) Attends a complete aircraft type training or component/ engine/APU training according to the previous chapter “Credit of experience. However, in the case of the renewal of the EASA Part-145 C/S - S/S individual authorisation, this option **cannot be used as a standard mean to replace** experience





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demonstration but should only be used under extraordinary circumstances such as “a person coming from a period of inactivity”, “a maintenance organisation having no maintenance workload for a period of time”, “etc.”; in fact, the preferred solution in case of lack of recent experience should be always to acquire the missing part according to the previous point (a);

- (c) Limited to the case of an Ax rated maintenance organisation, with a scope of work limited to minor line maintenance such as for example transit, daily, weekly. Depending from the amount of activity carried out by the maintenance organisation, it may be difficult for each of the line maintenance C/S to demonstrate the necessary “nature” of experience covering the full privileges. In such case it may be accepted, that the EASA Part-145 C/S individual authorisation is issued or renewed as applicable, introducing limitations relevant to the missing nature of experience (i.e. authorisation excluding defects rectification, etc..). Such limitation may be removed by complying with the point (a) or (b) above, as necessary.

When all the C/S available for a certain aircraft type is endorsed with limitations in the EASA Part-145 C/S individual authorisation, The maintenance organisation is responsible for analysing the possible impact on the scope of approval and for continued compliance with EASA Part- 145.





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4. Maintenance experience records.





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4.1. Individual logbook.

The compliance of the 6/24 months maintenance experience requirement shall be documented in an appropriate manner to demonstrate that both the “duration” and “nature of experience” meet the required standard.

A standard template for recording the maintenance experience is provided in “Foreign Part-145 approvals-maintenance experience logbook TE.CAO.00129-XXX”

The experience may be recorded/ documented in any other individual log book or recording system (which may be an automated one).

When the maintenance organisation is able to develop an automated system, the automatically generated logbook needs to contain the same level of information provided in the “Foreign Part-145 approvals-maintenance experience logbook TE.CAO.00129-XXX”, either:

- directly in the logbook printout, or;
- Indirectly by retrievable information (e.g. to be found in the work packages referred in the logbook itself).

The final decision to accept such system, considering the above mentioned guidance material is left to the assigned inspector.

