Notification of a Proposal to issue a Certification Memorandum

Maintenance Instructions to Transfer Dual Use Components from a State to a Civil Environment

EASA CM No.: Proposed CM–ICA-003 Issue 01 issued 27 June 2025

Regulatory requirement(s): **Commission Regulation (EU) No 748/2012, Part 21, point 21.A.7, 21.A.239(a) and 21.A.265(h),**
Commission Regulation (EU) No 1321/2014, Part-145, point 145.A.50

EASA Certification Memoranda clarify the European Union Aviation Safety Agency's general position on specific initial airworthiness, validation, continuing airworthiness or organisational items. They are intended to provide guidance on a particular subject and may provide complementary information for compliance demonstration, similar to AMC/GM even if not formally adopted through an ED Decision. Certification Memoranda are not intended to introduce new certification requirements or to modify existing certification requirements.

Log of issues

Issue	Issue date	Change description
01	27.06.2025	First issue.

Table of Content

1. Identification of Issue

EASA has been approached by Member States, industry e.g. maintenance organisations, and other stakeholders on the possibility and related conditions of transfer of dual use components from a state (e.g. military) environment to a civil environment.

This certification memorandum provides guidance for the Type Certificate Holders (TCH) who intend to develop optional maintenance instructions to support and facilitate the transfer of components from state to civil environment. Such guidance is intended to facilitate the issuance of an EASA FORM 1 release certificate for the concerned part or component in accordance with the point 145.A.50 Annex II (Part-145) to Commission Regulation (EU) No 1321/2014.
A Flowchart: "Dual Use Components from a State to a Civil Environment and the Associated Maintenance Instructions" has been added to the CM as an appendix for contextual information purpose.

2. Applicability

The Certification Memorandum is intended to address components that are EASA certified in accordance with Part 21, which are however used in both civil and state environment, defined here as dual use components. It encompasses both new components from storage and used/maintained components in a state environment.

3. Recommended Prerequisites for the Civil Use of Dual-Use Components

The below assumptions are the basis to ensure that such dual use component installations have no negative impact on an aircraft operated under EU regulation 965/2012 in regard to its continued airworthiness (no potential unsafe condition due to its state environment) when using stored or used/ maintained components coming from a state environment:

- The TCH should establish specific maintenance instructions for a defined list of components which are eligible for transfer from a state to civil environment;

- Furthermore, the TCH should have detailed DOA procedures for the evaluation of the state operational impact on the subsequent civil operation and for the development of relevant specific maintenance instructions to be agreed with the Agency;

- State operators should also provide data on relevant design changes, repairs incorporated, having a potential impact and repercussion on dual use components;

- State operators should in addition ensure that the component has been stored and/or maintained to an acceptable standard either in accordance with the EASA requirements or an acknowledged equivalent state standard;

- The data and records provided by the relevant state operator must be reliable and available to the civil Part-145 maintenance organisation (AMO). The AMO should have a dedicated procedure in its MOE (similar to the procedure related to § 2.8 of AMC2 145.A.50(d)) for the acceptance (including incoming inspection, records review), maintenance, and release of such component taking into account the specific TCH instructions.

4. EASA Certification Policy

4.1. General Considerations when Developing Specific Instructions

The development of specific maintenance instructions in support of the transfer of dual use components from a state to a civil environment is considered optional for the TCH. There is no obligation for the TCH to develop and distribute this kind of maintenance instruction in accordance with point 21.A.7(a).
However, once this specific kind of maintenance instruction is produced and distributed, it needs to be maintained in the same manner as ICA would, in accordance with point 21.A.7(d).

Furthermore, any later stand-alone change of those maintenance instructions by the TCH may need to be evaluated in accordance with point 21.A.90C.
The TCH should have detailed DOA procedures for the development of specific maintenance instructions covering the transfer of components from a state to a civil environment. The approval process in accordance with AMC1 21.A.239(d), GM 21.A.265(h) should apply. This should be agreed with the Agency and may be a significant change to the design management system in accordance with 21.A.247.

It is to the discretion of the TCH to decide on the format of this specific maintenance instructions, for example to use a Service Bulletin (SB), Service Information Letter (SIL) or a particular manual. However, the general format consideration in accordance with GM2 21.A.7(b) should be observed. The specific maintenance instructions for the transfer of components should be marked as approved data in accordance with GM 21.A.265(h).

Due to the special nature of the maintenance instructions, it is recommended to produce a comprehensive separated instruction not to be integrated into standard ICA which are produced in compliance with 21.A.7 and the applicable CS e.g. for compliance showing with CS 23.1529, CS 25.1529, CS25.1729, CS 27.1529, CS 29.1529, CS-E 25, CS-P 40, etc. Nevertheless, the specific maintenance instruction for the transfer of components may refer to existing ICA or other maintenance instructions as appropriate.

Within the instruction provided by the TCH, the assumption that the component should have been stored and/or maintained to an acceptable level, should be highlighted to the civil operator/CAMO/maintenance organisation. Also, the principle that only components that are included in the defined list of components from the TCH are eligible for transfer under the provisions described in this certification memorandum should be highlighted. It should be highlighted by the TCH that the maintenance instructions should apply only to the components that are included in the defined list, under the provisions described in this certification memorandum.
Furthermore, the TCH should highlight within the instruction, that the AMO should have a dedicated procedure in its MOE for the acceptance (including incoming inspection, records review), maintenance, and release of such component taking into account the specific TCH instructions.

An evaluation of the state operational impact on the subsequent civil operation is to be done. In the maintenance instructions the TCH should provide detailed methods to the civil operator / owner and maintenance organisations to evaluate and compensate this impact or may require that the TCH performs certain steps of this evaluation e.g. in case of specific findings during requested inspections/tests/checks or for the calculation of the consumed life of a component as necessary.

As a result of on the design review performed by the TCH, the specific maintenance instructions to be carried and released by the AMO may typically consist of detailing:

- a list of components eligible for transfer
- a reminder to perform incoming inspection of the component in accordance with the MOE and to review the component continuing airworthiness records

- a method to recalculate the consumed life in regard to FH/FC/CT or other applicable usage parameter of a component and/or alternatively an instruction to contact the TCH for support on the recalculation, as applicable
- any one-time maintenance tasks (e.g. dismantling, inspection, checks, test, or replacement/re-assembly of subcomponents) considered necessary by the TCH in order to compensate for the use of the component in the state environment and to ensure there is no negative impact on an aircraft operated under EU regulation 965/2012 in regard to its continued airworthiness.

4.2. Design Considerations when Developing Specific Instructions

When a component is proposed for transfer from a state environment to a civil environment, the TCH should review the impact on the civil certified design and the related compliance with its civil certification basis.

Detailed information on the state certification and assumptions, e.g. military mission profile, environmental condition, etc. should be available for this impact assessment.
Furthermore, any state design change, repair incorporated, may need to be evaluated for having a potential impact and repercussion on a dual use component.

The transfer of data between the Design Approval Holders, DAHs, e.g. civil TCH/ state TCH, state STCH, may require specific agreement(s), especially when they are different organisations.

Typically, the instruction to be developed for a component (on P/N level) should cover generically the full range of the state use case, mission profile, envelope, and environmental condition e.g. maritime, desert, high/low altitude, etc.
However, in case detailed state in-service information (e.g. for engines, where detailed operational data is submitted to the TCH) is available, the TCH may decide to detail and adapt the instructions for individual components (on S/N level).
Furthermore, upon request from the State operator, any reported operational exceedance, design change/repair impacting the component may require the adaptation of the instructions for individual components (on S/N level) or may result in the elimination of the component as a candidate for dual use.

5. Supporting Data

5.1. References

It is intended that the following reference materials be used in conjunction with this Certification Memorandum:

Reference	Title	Code	Issue	Date
(EU) 2018/1139 Article 2(3)(a)	Basic Regulation	---	---	---
Part 21, Subpart A	General provisions	---	---	---
Part 21, Subpart E	Supplemental Type-Certificates	---	---	---
Part 21, Subpart J	Design Organisation Approval	---	---	---

Reference	Title	Code	Issue	Date
Commission Regulation (EU) No 1321/2014 Annex II (Part - 145)	Maintenance Organisation requirements	---	---	---

5.2. Abbreviations

AMC	Acceptable Means of Compliance
AMO	Approved Maintenance Organisation
CAMO	Continuing Airworthiness Management Organisation
CM	Certification Memorandum
CS	Certification Specification
CT	Calendar Time
DAH	Design Approval Holder
DOA	Design Organisation Approval
EASA	European Union Aviation Safety Agency
ED	Executive Decision
EU	European Union
FC	Flight Cycle
FH	Flight Hour
GM	Guidance Material
ICA	Instructions for Continued Airworthiness
MOE	Maintenance Organisation Exposition
SB	Service Bulletin
SIL	Service Information Letter
STCH	Supplemental Type Certificate Holder
TCH	Type Certificate Holder (remark: Type Certificate Holder is used in the CM by default as the civil TCH, if not mentioned otherwise)

5.3. Definitions

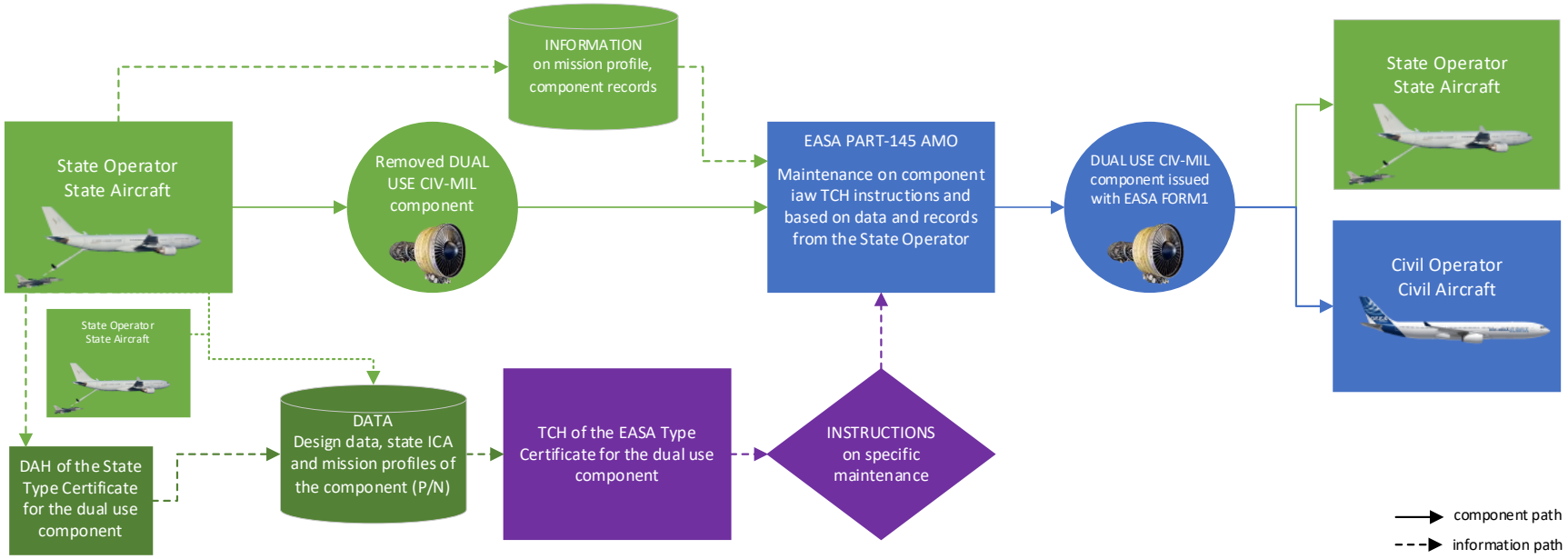
State or state environment	Operational framework as defined in Regulation (EU) 2018/1139 Article 2 (3)(a) by "military, customs, police, search and rescue, firefighting, border control, coastguard or similar activities or services under the control and responsibility of a Member State".
Civil or civil environment	Operational framework as defined in Regulation (EU) 2018/1139 Article 2 (3)(a) as other than "military, customs, police, search and rescue, firefighting, border control, coastguard or similar activities or services under the control and responsibility of a Member State".
Dual use component	A component that is EASA certified, however it may be used in both civil and state environments.
Component	'component' means any engine, propeller, part or appliance in accordance with Article 2(c) of Regulation (EU) No 1321/2014

6. Remarks

1. This EASA Proposed Certification Memorandum will be closed for public consultation on the **08th of August 2025**. Comments received after the indicated closing date for consultation might not be taken into account.
2. Official comments to the proposed CM are to be filed through the EASA Comment Response Tool.
3. For any question concerning the technical content of this EASA Certification Memorandum, please contact:
   Name, First Name: JANISCHOWSKY, Markus
   Function: Senior Expert - Instructions for Continued Airworthiness
   E-mail: markus.janischowsky@easa.europa.eu

Appendix Flowchart: Dual Use Components from a State to a Civil Environment and The Associated Maintenance Instructions

Transfer of dual use civil-military components from a State to a Civil environment and issue of associated maintenance instructions



DATA SENT TO TCH ON THE TYPE OF COMPONENT

- State operators and State Design Approval Holders (SDAH) are responsible for sending data relevant to the generic component to the Type Certificate Holder (TCH)
- State operators should provide relevant data on design changes, incorporated repairs to the SDAH and directly to the TCH (for detailed in-service data)
- State operators should report exceedances beyond the state certified mission envelope to the SDAH and directly to the TCH (for detailed in-service data)
- SDAH should provide data on design, ICA, usage, mission profiles, and operational exceedances (and performed mitigations) beyond the state certified mission envelop and limitations and any state design change, repair incorporated to the TCH

MAINTENANCE INSTRUCTIONS ISSUED BY TCH

- The TCH is responsible for issuing the specific maintenance instructions for the transfer of dual use civil-military components from a state environment to a civil one e.g. Service Bulletin (SB)
- The TCH should analyse the data received from the SDAH and State Operator and develop specific maintenance instructions as required to address the state design data, ICA, usage, and mission profiles (for P/N)
- The maintenance instructions should provide the AMO with information on what data needs to be received from the State operator and how to asses it
- The maintenance instructions should provide the AMO with the actual tasks to be carried out (either existing ones e.g. AMM, or specifically developed ones)

DATA SENT TO AMO ON INDIVIDUAL COMPONENT

- State operator is responsible for sending information relevant to the individual component to the Approved Maintenance Organisation (AMO)
- State operator should provide the information requested in the maintenance instructions issued by the TCH and as further solicited by the AMO, for the individual component (S/N)
- State operator should provide information on the management of continuing airworthiness and maintenance of the aircraft, and the standards and regulations applied
- State operator should provide information on the continuing airworthiness of the aircraft in relation to its operation, particularly regarding operational exceedances

AMO RELEASE TO SERVICE WITH EASA FORM 1

- The Approved Maintenance Organisation is responsible for carrying out maintenance iaw the TCH issued maintenance instructions and for issuing the EASA FORM 1 release to service for the individual component
- The AMO should assess the information and records received from the State Operator for the individual component (S/N)
- The AMO shall assess the applicability of the TCH maintenance instructions against the component
- The AMO shall carry out the required maintenance iaw the TCH maintenance instructions, as applicable to the component
- The AMO shall issue an EASA FORM 1 for the release to service of the component under the provisions of point 145.A.50