SLIDO QUESTIONS FROM THE PART-145 WEBINAR ON OCCURRENCE REPORTING

1. Is there clear regulatory guidance on the requirements for CAMO organisations to investigate occurrences to establish the source of a noted condition, rather than speculatively enquire that a maintenance occurrence 'May' have come from your organisation? The effort to investigate and prove/disprove a case can be considerable, when this resource could be more effectively deployed by the 145.

→ **Response:**

While not the focus of the webinar, the reporting requirements for CAMO organisations are covered under CAMO.A.160 and CAMO.A.202. On this basis, CAMOs are expected to carry out investigations in accordance with the applicable CAME procedures (refer to AMC1 CAMO.A.202 for additional details). As part of an investigation, the CAMO may request additional information from the maintenance organisation(s).

Foreign Part 145s are expected to, where relevant, cooperate with the owner, operator or CAMO on occurrence investigations by exchanging relevant information to improve aviation safety (refer to AMC1 145.A.202 for additional details).

2. If a portion of the maintenance was contracted to another EASA certificated AMO and this AMO found an issue, who should do the reporting? The contracted AMO that found the issue or the AMO that has the direct repair order from the operator?

Response:

In accordance with GM1 145.A.205(c), a Part-145 organisation is responsible for ensuring that interfaces and communication channels are established with the contracted maintenance organisation(s) for occurrence reporting. This does not replace the obligation of the contracted organisation(s) to report to the competent authority in accordance with Regulation (EU) No 1321/2014. So, both have responsibility to report.

3. Should we report malfunctions of an operator that is not part of the EU? for example aircraft with N registration.

Response:
In the context of maintenance activity, and in accordance with Section 2.18 of UG.CAO.00024-XXX, organisations are expected to report to EASA all cases where an occurrence is originated as a result of maintenance carried out by the organisation, regardless of the registration of the aircraft or customer and in addition to any other reporting responsibility to the Competent Authority responsible for the approval under which the maintenance was carried out. A typical example is a situation where the organisation is made aware of a technical incident of a non-EU customer immediately following a maintenance carried out by the organisation itself, e.g. where an incorrect assembly of aircraft parts by the maintenance organisation was identified as the cause of the incident.

4. Is it correct to say for an extrinsic occurrence it can be raised as high risk and still closed?

   Response:

   Firstly, if the cause is "extrinsic" there is nothing the reporting MO organisation can do to either (a) correct the safety of the approved design or (b) correct the contributing factors that caused a third-party maintenance organisation to "ill-perform" the maintenance task(s). Secondly, for the aforementioned points (a) and (b), the reporting MO can and should report as closed-on-issue, otherwise what would be the corrective action from the reporting MO? In such a case, the MO can certainly use the safety promotion channel of its SMS to spread the knowledge. Thirdly, the risk classification/score can only be the result of the methodology used inside the MO for assessing the operational risk resulting from their activity. Is it pertinent for the reporting MO to use a method that would assess the "combined risk" produced by the combination of "involved" organisations? How then the reporting MO will be able to prioritise and allocate resources to mitigate consequences of hazards with higher safety risks? These are questions to be answered by the people in charge of the MO's SMS.

5. Should we need to report to EASA occurrences from non-EU registered aircrafts? For example Mexican registrations.

   Response:

   In the context of maintenance activity, and in accordance with Section 2.18 of UG.CAO.00024-XXX, organisations are expected to report to EASA all cases where an occurrence is originated as a result of maintenance carried out by the

organisation, regardless of the registration of the aircraft or customer and in addition to any other reporting responsibility to the Competent Authority responsible for the approval under which the maintenance was carried out. A typical example is a situation where the organisation is made aware of a technical incident of a non-EU customer immediately following a maintenance carried out by the organisation itself, e.g. where an incorrect assembly of aircraft parts by the maintenance organisation was identified as the cause of the incident.

6. What is exactly the difference between the AMC 20-8A and the REG 2015/1018, in terms of mandatory occurrences?

   Response:

   The list of reportable occurrences for a foreign Part-145 MO is defined in AMC20-8A, chapter 9.3, Maintenance and Continuing Airworthiness Management. This document describes an Acceptable Means of Compliance to a regulation. An AMC is one way, but not the only way, to comply with a set of regulatory requirements.

   In the past, the two reference documents differed to some extent. Since amendment 19 of AMC 20 document, the content of AMC20-8A, chapter 9.3 Maintenance and Continuing Airworthiness Management, and Annex II of reg. 2015/1018 most dissimilarities have been addressed.

   The list of reportable events for foreign Part-145 MO should always be aligned to the latest version of AMC 20-8, currently at version A.

   These lists should not be understood as being an exhaustive collection of all the issues that may pose a significant risk to aviation safety: Therefore, reporting should not be limited to the items listed therein.

7. Hi, DHL Air UK here. We are currently using ECCAIRS system to report any MOR events on foreign aircrafts from out third-party operators. Does this system remain in place and continue to use it, or a different/new system should be used?

   Response:

   Your ECCAIRS account is linked to your organisation's approval number. As long as you report under the same approval, you can continue to use the same account. DHL Air UK is a registered E2 organisation in your specific case, so you can continue to use the same account. If you need to report to other parties or

authorities, please do not use the EASA account, as they will not be informed since the report isn't addressed to them.

8. If a report is extrinsic but is not annotated as "closed on issue" will EASA still require CA from the MO or not? Will EASA close the report on behalf of the MO? Or do we need to go back in and change the report to closed on issue? (edited)

   Response:

   First, the word “extrinsic” was used in the webinar to clarify that sometimes the cause of the safety event does not originate from the MO daily/business operations.

   In summary, if the occurrence is not attributable to action(s) carried out by the reporting organisation, the organisation shall adequately contain and correct the reported issue(s). If the occurrence is reported as ‘closed on issue’, those actions would have been implemented (or planned for) as part of the maintenance activity required. When submitting the occurrence, the organisation must clearly indicate the containment and corrective actions implemented (or planned for) and the parties informed. For occurrences reported as ‘open’, the Team Leader will request information about the progress and closure of the investigation. Depending on the subject and on recurrence, EASA may investigate the subject and/or inform the Competent Authority responsible for the CAMO or Part 145 approval, for action.

9. Will all the data collected, shared to all MRO, air operator so we can learn from the issue and prevent them from recurring again?

   Response:

   An action is currently underway for the review of occurrences reported by Foreign Part 145 organisations. Once completed, it is expected to be published during the first quarter of 2026.

10. Report can be submitted directly into ECCAIRS ?

    Response:

    ECCAIRS 2 provides the M2M (Machine to Machine) method for the automatic submission of reports into ECCAIRS 2 using the e5x file format. This method is

available only to registered organisations that have explicitly requested it and have been approved after successfully completing all tests. All the detailed information on this file format, may be here.

11. Does the system allow request for extension before due date?

    Response:

    There is per say no extension but the overlying principle "the higher the risk, the faster the report/corrective actions" should prevail. It is also believed that for MOs the identification of the contributing factors to a maintenance-induced discrepancy can be done in a matter of a few working days. However, it does not mean that the full set of preventive and corrective actions must be implemented within 30 or 90 days. It is in the final risk assessment that all necessary actions to address the contributing factors will be listed with their respective timelines. The EASA approach is that priority should be given to the quality and completeness of the investigation, even if this may slightly impact the timescales for follow-up and/or closure submission. However, if organisations are consistently unable to meet the required timescales, this is possibly an indicator of systemic issues in the Management System that need to be addressed.

12. While we are working within the spirit of a just culture, will the CA still issue a Level 1 or 2 finding to an AMO that voluntarily discloses and reports a reportable discrepancy?

    Response:

    EASA encourages and promotes a just culture and open reporting. The intention of the reporting system is not to replace findings of non-compliance, it is primarily focused on the identification of hazards and associated risks, and the implementation of actions to adequately address and prevent these, at organisation level and at Industry level.

    In the event of significant occurrences, the organisation is expected to identify and assess the associated risks, identify the root cause(s), and to timely implement actions in accordance with the applicable MOE procedures. It is possible that these internal actions may result in the limitation of the approval/privileges, subject to the risk classification.

    Findings of non-compliance are clearly defined in the regulation. For Level 1 findings identified by the organisation, the organisation shall notify it to the Accountable Manager and EASA within the prescribed timescales and implement immediate actions to self-limit the approval/privileges as necessary.

Upon receipt of an occurrence report, EASA will assess the contents of the report and determine the most appropriate course of action. This review will take into consideration the actions implemented by the organisation and the safety issue reported. Possible EASA actions range from monitoring the action plan proposed by the organisation, to limitations to the privileges/approval, if, for example, the actions proposed are not adequate or if the safety issue remains and is not being adequately addressed. Each case is unique and will be reviewed accordingly.

The following questions were responded to live during the webinar. To listen to the answers only, please go to **01:11:36** (h:m:s) in the published webinar.

1. As a foreign AMO, how can we reactivate our occurrence reporting portal account, which has been disabled due to inactivity for 90 days? The contact form was filled out on the website but no response has been received yet. Responded to live, please consult video.

   Additional response: (as a complement to the online response) The account is now active again. If an ECCAIRS 2 account remains inactive for 90 days, it will be automatically deactivated. A reminder message is sent 14 calendar days prior to the deactivation of the account, encouraging the user to access the ECCAIRS 2 system. This is based on the IT security guidelines for monitoring the system regarding non-active users. If the system is not accessed within 90 days, the account will become inactive, and a request must be sent to reactivate it.

2. If the "safety" is affected or not, can often not be assessed by the MO but only by the TCH. So, the MO is depending on the TCH assessment. As the TCH also reports to EASA, does the MO still need to report? Responded to live, please consult video.

3. In the 2.18 of UG.CAO.00024, There is the instruction for a MO to report any case regardless of the registration of aircraft or customers in case that an occurrence is originated as a result of maintenance carried out by the organisation. so do we have to continue to do this in accordance with UG? Responded to live, please consult video.

4. As a Foreign AMO, we submit duplicate ECCAIRs for EU/non-EU NAA which both use the system, as well as Operator/DO. Is there a possibility for better integration within the tool to allow simpler reporting and follow up which are not only more efficient but allow better NAA-EASA co-ordination? Responded to live, please consult video.

5. With respect to a c-rated organisation, do we report everything that meets AMC20-8A definition, only those incidents on components that an EASA release has been asked for or only on components sent in by EU operators? (edited) Responded to live, please consult video.

6. When the risk assessment for Low, Medium and High, what criteria is this based / assessed upon? Is this the Maintenance organisations self-defined criteria agreed with our Surveyor? Responded to live, please consult video.
7. If we have reported the early retirement of a life limited part previously, do we still need to report it again if same failure found on the part with same part number? Also, can we report it as "closed on issue" on those life limited part? Responded to live, please consult video.

8. Is it possible view the occurrence reports submitted to EASA from other approved organisations? Responded to live, please consult video.

9. EASA 21J DAH, does this refer to Component OEM as well. What was mentioned was aircraft, engine, propeller DAH. Similarly, "Product" definition in the slides does not indicate Component as a "Product". Responded to live, please consult video.
10. If the reportable occurrence happens on components to be installed on non-EU registered aircraft, does this still need to be reported to EASA, since this will be reported to the regulatory authority of the state of registry of the aircraft Responded to live, please consult video.