

# SDM Webinar – Foreign Part-145 Organisations

## Guidance to comply with the EASA occurrence reporting requirements

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Safety Management, Sustainability and Global  
Outreach Directorate.  
16-October-2025

**Your safety is our mission.**

# Today's agenda

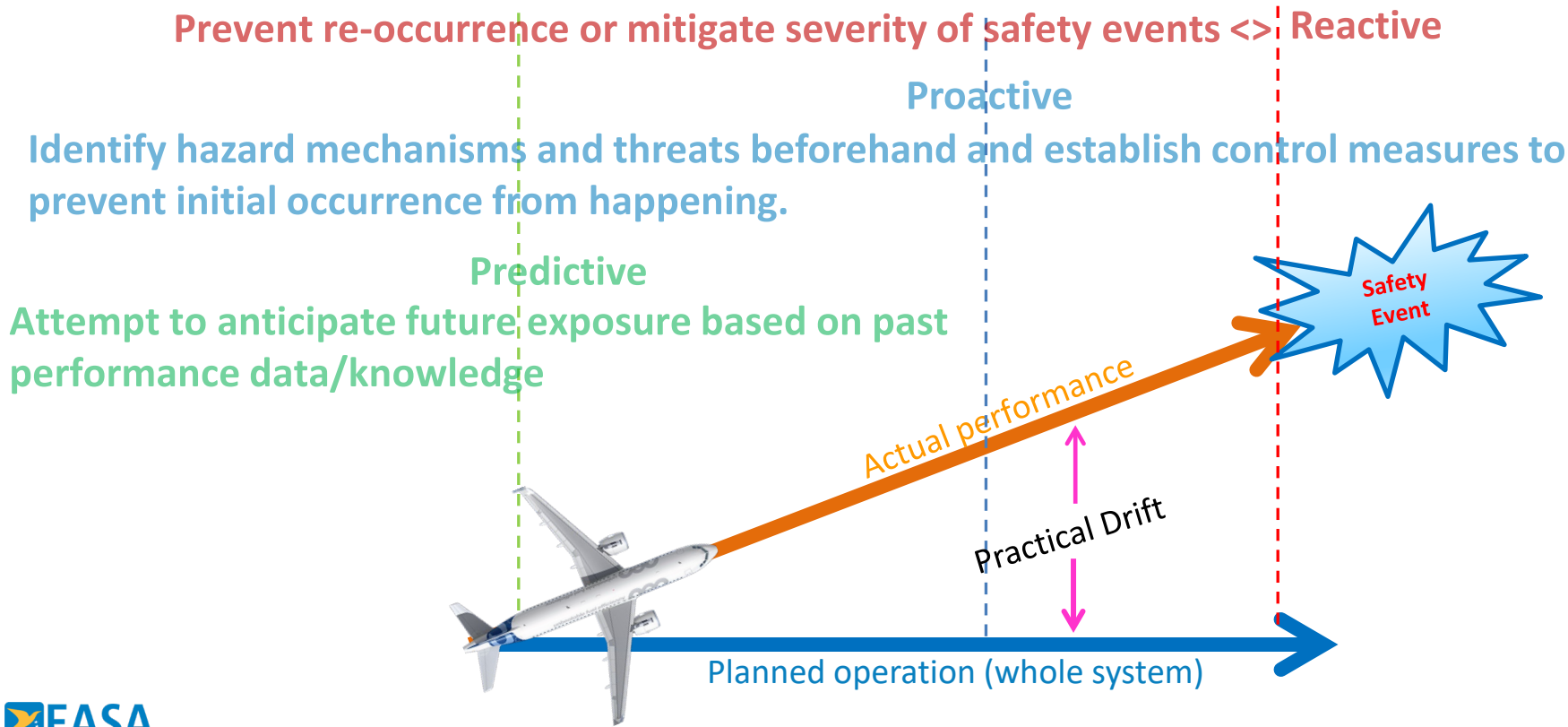
- Aim of the webinar
- Regulatory basis for reporting
  - why to report? what for? What is reportable? to whom ? (EASA, TCH, SoR CAA...)?
- Reporting guidelines and good practices
  - register for E2 account (compulsory) and a tailored reporting sheet (optional).
  - Good practices for high data quality reports
- Conclusion
  - Q & A : SLIDO – send us your questions
  - Post webinar actions

# The aim of the webinar

Guide Foreign Part-145 Organisations (by convention further written as MO)

- Better comply with applicable mandatory reporting requirements
- Fine-tune the MO's policies and procedures
- Improve the MO's screening of internally reported events
- Assess and address the contributors to safety deficiencies detected in the MO as a system. ([145.A.202](#) on Internal safety reporting scheme refers.)

# The foundation: 3 forms of risk management



# Occurrence Reporting Regulatory Framework for MO

Reg. (EU) 996/2010  
Accident and  
Serious Incident  
Investigation

Reg. (EU) 2018/1139  
EASA Basic Regulation

Reg. (EU) 376/2014 Occurrence reporting

CIR (EU) 2015/1018 List of  
Reportable Occurrences

CDR (EU) 2020/2034 and  
CIR (EU) 2021/2082 as  
regards ERCS

Annex II : technical  
conditions, maintenance  
and repair of the aircraft

## Foreign Part-145

Reg. (EU)  
748/2012

- Design Organisation
- Production Organisation

Reg. (EU)  
1321/2011

- **Maintenance Organisation**
- Continuing Airworthiness Management Organisation

Reg. (EU)  
2017/373

- Air Navigation Service Providers
- DAT Providers

Reg. (EU)  
2023/1769

- ATM/ANS equipment

Reg. (EU)  
965/2012

- Air Operators

Reg. (EU)  
1178/2011

- Pilot Training Organisations

Reg. (EU)  
139/2014

- Aerodromes

Reg. (EU)  
452/2014

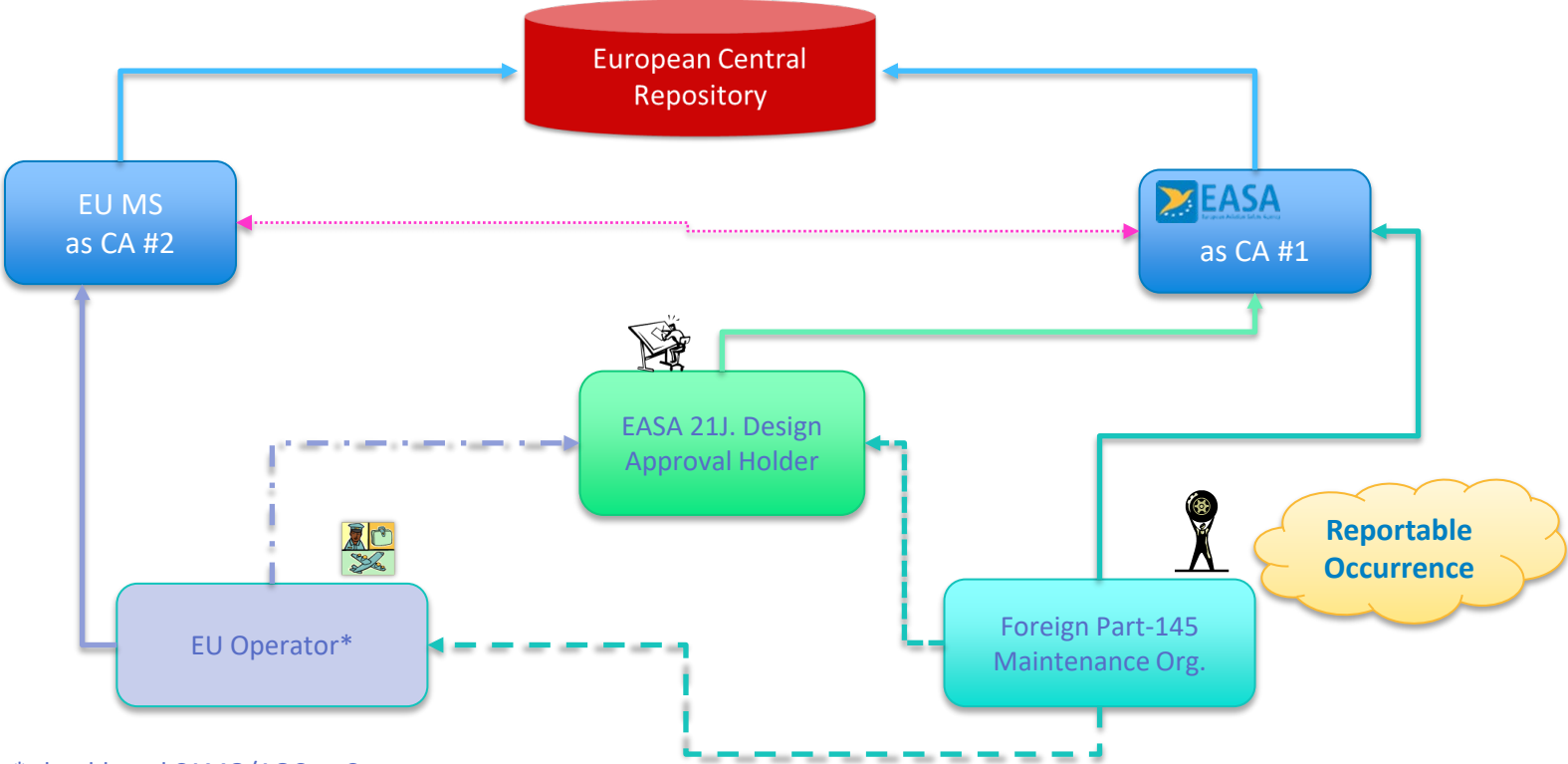
- Third Country Operators (TCO)

AMC 20 – 8A

# SARPS of ICAO Annex 8, Airworthiness of aircraft

- Chapter 9. Continuing Airworthiness of Aircraft, **para. 9.1.2.** *“Under the control of the respective CAAs of the State of Design, the State of Registry and, when appropriate, the State of the Operator, **continuing airworthiness includes the following:** /.../*
- (d) the **reporting** of faults, malfunctions and defects and other significant maintenance and operational information **by the operator to the type design organization** in accordance with the requirements of the State of Registry and the State of the Operator;
- (e) the **reporting** of faults, malfunctions and defects and other significant maintenance information **by the maintenance organization to the type design organization** in accordance with the requirements of the State having jurisdiction over the maintenance organization;
- (f) **the analysis of faults, malfunctions, defects, accidents and other significant maintenance and operational information by the type design organization, the State of Design and the State of Registry** and the initiation and transmission of information and recommended or mandatory action to be taken in response to that analysis.

# Mandatory reporting flow, an EU-centric Example



\* should read CAMO/AOC or Customer

# Mandatory Occurrence Reporting System #1

In short, there are **two kinds of occurrences** that **MUST** be reported.

- The **regulatory-determined reportable occurrences** that must be reported by a MO, and that are **related to the “safety of the product”**. (i.e. aircraft, engine, propeller, (E)TSO part) or to the **“safety of aircraft operations”**.
- The MO’s **SMS-determined reportable occurrences** that must be reported to EASA - as Competent Authority - and that are **related to the “safety of the organisation”**. (i.e. cases where an occurrence originates from maintenance conducted by the MO - as a system - with or without actual consequences on the individual product or series. )

# Mandatory Occurrence Reporting System # 2

Regulatory-determined reportable occurrences that are related to the “safety of the product” or to the “safety of aircraft operations”:

- **Common** to those occurrences: **Causes** are **EXTRINSIC**. (from outside of the MO)
- **Can initially be reported** to EASA as “**closed on issue**”, because the MO is not responsible for the continued airworthiness of the product ‘s type design.
- **Can be reported** to EASA as “**closed on issue**”, when the reporting MO is not the **originator of the maintenance-related error**.
- “**closed on issue**” implies one and **only one report**, with no need for follow-up reports. (no corrective action at MO level)
- **Corrective actions ≠ remedial maintenance action** (restoration of continuing airworthiness, M.A.301(b) refers, by means of defect rectifications)
- MO to report to **all necessary “parties”** (i.e. DAH, CAMO, AOC and EASA.) and indicate to EASA all “**parties informed**” at time of reporting.

# Mandatory OR System, # 3

SMS-determined reportable occurrences that are **related to the “safety of the organisation”**:

- **Common** to those occurrences: **Causes** are **INTRINSIC**. (from inside of the MO)
- **Some (Risk Classification permitting) can be** reported to EASA as “**closed on issue**”, **conditionally to** a combined **EASA-approved procedure** and **risk classification**.
- **Some shall be** reported to EASA as “**Open**”, **when** the risk **classification triggers** further **needs for investigation**.
- “**Open**” report implies existence of a safety deficiency at MO level
- “**Open**” report implies likely **need for mitigations and/or corrective action(s)** at **MO level**
- ...Go to next slide

# Mandatory OR System, # 3, cont'ed

SMS-determined reportable occurrences that are **related to the “safety of the organisation”**:

...

- **“Open”** may also imply need for **mitigations and/or corrective action(s) at product level** to address maintenance-induced discrepancies.
- **“Open”** report implies one or more **“follow-up”** report(s) until submittal of a final report that shall be reported to EASA as **“Closed”**.
- **Final report** shall contain a final risk assessment, document mitigations and/or corrective actions for EASA TL’s review, comments and/or acceptance.
- Report to **all necessary “parties”** (i.e. DAH, CAMO, AOC and EASA.) and indicate to EASA all **“parties informed”** at time of reporting.

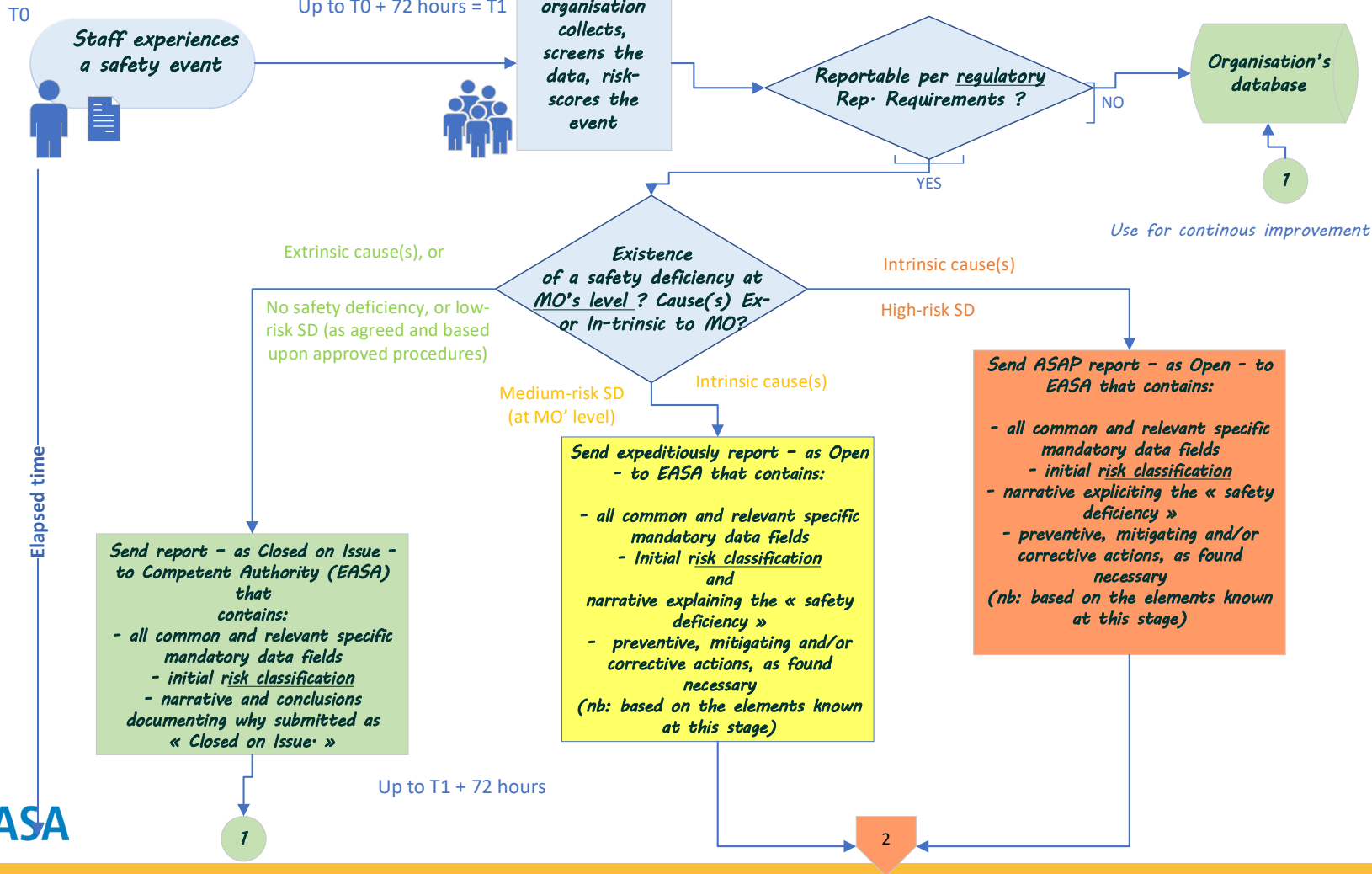
# Mandatory Occurrence Reporting (MOR) System

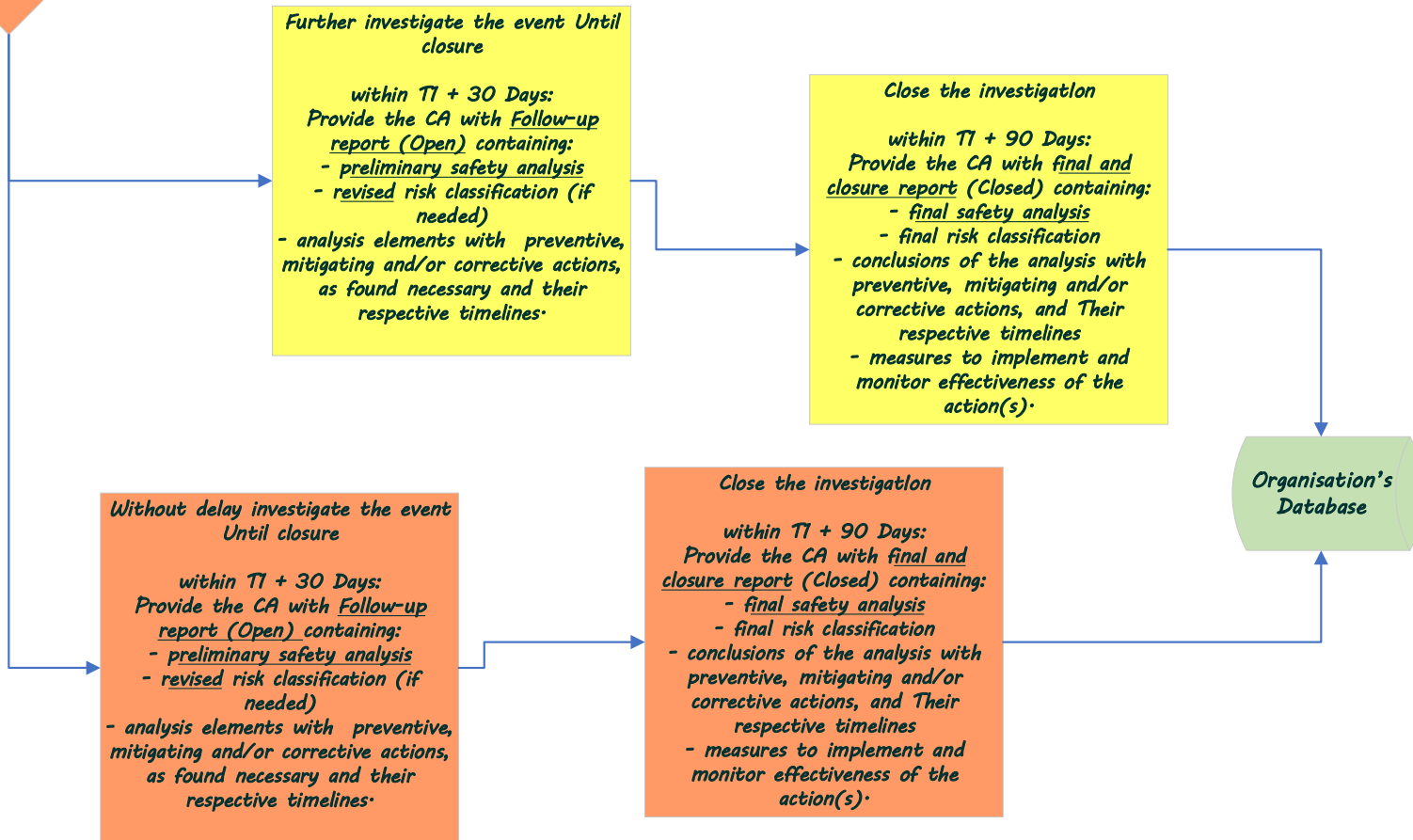
- MO must establish an internal safety reporting scheme, as part of its safety management system.
- Collect and evaluate occurrences that are required to be reported under para. 145.A.60 and 145.A.202
- List of reportable occurrences as per GM1 145.A.60 and AMC 20-8A (chap. 9(3)), considering alignment with annex II of IR 2015/1018). It must also include notification to EASA cases where an occurrence originates from maintenance conducted by the MO.

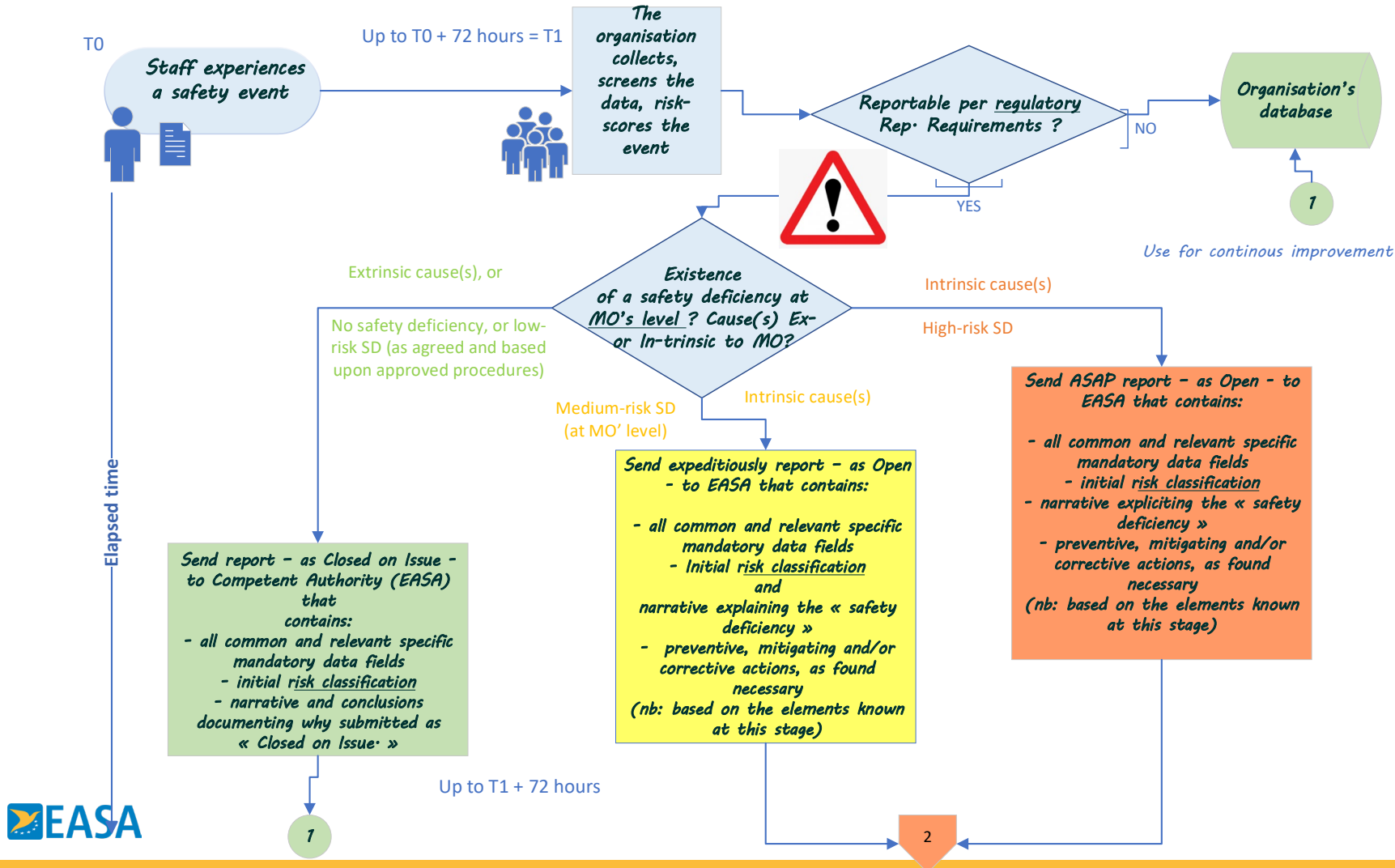
# Mandatory Occurrence Reporting (MOR) System

- When occurrences originate from maintenance conducted by the MO, (aka maintenance-induced discrepancies):
  - MO must identify the cause(s) of, and contributing factor(s) to, the maintenance event(s), and address them as part of its safety risk management (SRM) process i.a.w. para. 145.A.200(a)(3).
- The **MO's SRM procedure** must describe the reporting procedure to EASA, the organisation responsible for the design of the aircraft/engine/propeller (aka product) or component, and the customer/operator/CAMO as applicable.
- Foreign Part-145 approvals - User Guide for Maintenance Organisation Exposition, UG.CAO.00024-010 dated 27-Aug-2025

# The reporting process in a flowchart, condensed







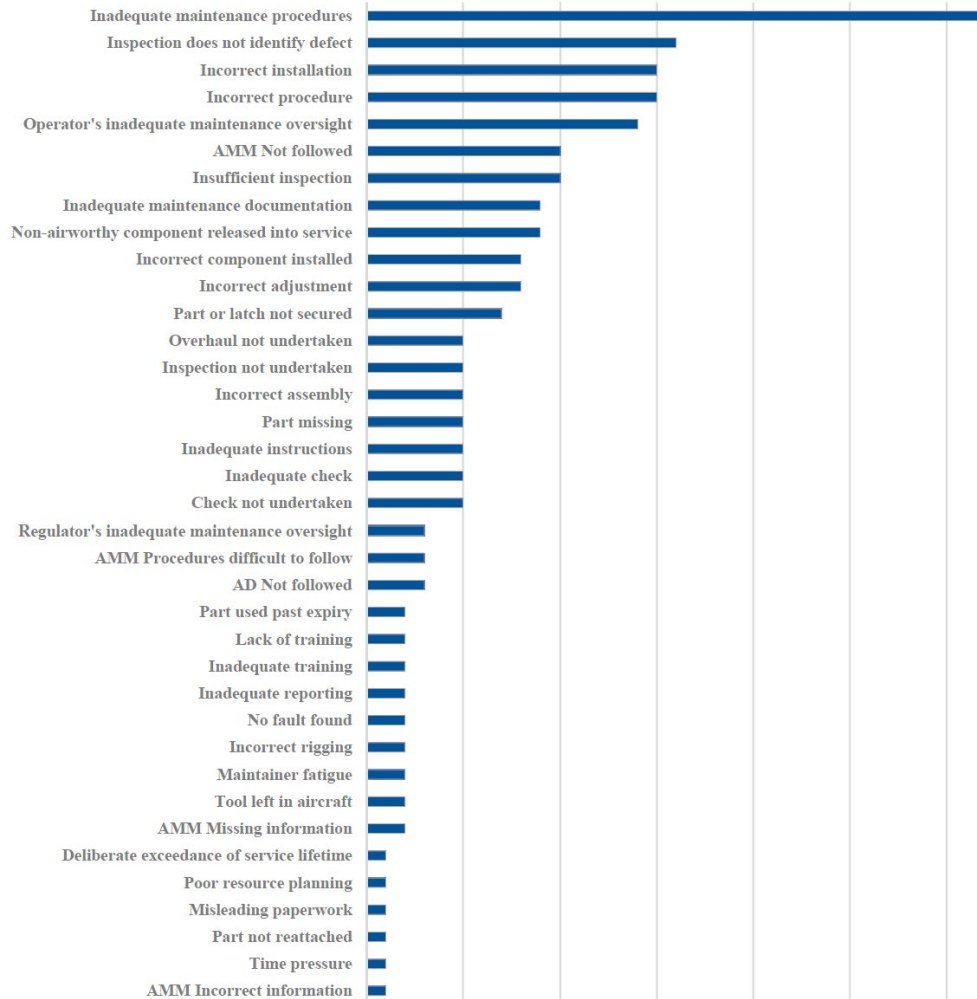
# What is reportable?

# AMC 20-8A vs Annex II of Reg. 2015/1018

- **AMC 20-8()** is the **reference document** for Foreign Part-145 Organisations.
- Many dissimilarities existed between annex II of Reg. 2015/1018 and AMC 20-8.
- Content of **AMC 20-8A mostly aligned** since amdt 19 of AMC 20.
- List of reportable events must always align to latest version of AMC 20-8. (current version is AMC 20-8A)

# A Contemporary Analysis of Aircraft Maintenance-Related Accidents and Serious Incidents

Insley, J.; Turkoglu, C. A Contemporary Analysis of Aircraft Maintenance-Related Accidents and Serious Incidents. *Aerospace* 2020, 7, 81. <https://doi.org/10.3390/aerospace7060081>



# Investigating maintenance-induced discrepancy

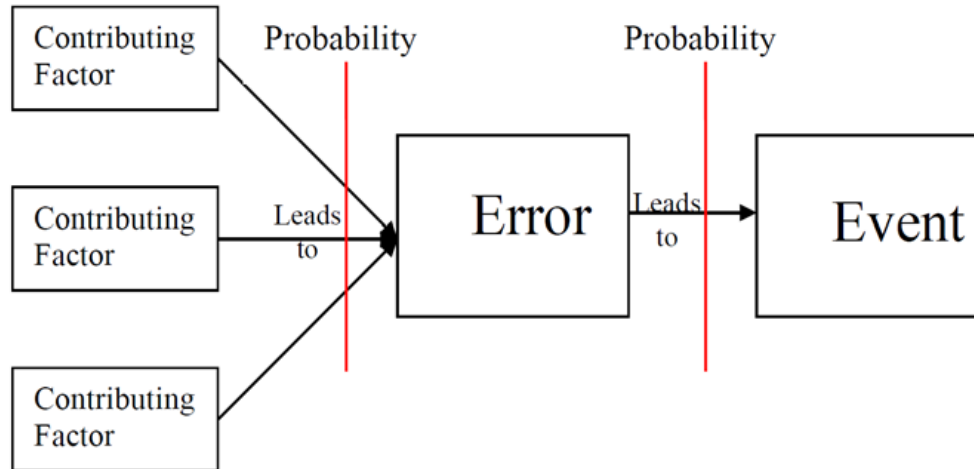
## The Maintenance Event Decision Aid (MEDA)

# The Maintenance Event Decision Aid (MEDA) #1

- Origins from a US Navy process developed by aerospace psychologists, **Human Factors Analysis and Classification System Maintenance Extension (HFACS-ME)**, data from UK CAA MOR and Boeing operators.
- **One** method, not the only one
- Worth having a **look at the MEDA guideline** to possibly reuse parts or the entirety of it to improve - if need be - your own method.

# The Maintenance Event Decision Aid (MEDA) #2

- A **structured process** to investigate events caused by maintenance technician and/or inspector performance.
- Events can contain both an **error** component and a **non-compliance with regulations, policies, processes, and/or procedures**.



# The Maintenance Event Decision Aid (MEDA) #3

The MEDA fundamental philosophy is:

- A **maintenance-related event** can be caused by an error, by a violation, or by an error/violation combination
- Maintenance **errors are not made on purpose**
- Maintenance errors are **caused by a series of contributing factors**
- **Violations**, while intentional, are **also caused by contributing factors**
- **Most** of these error or violation **contributing factors** are **under the control of management** (ca. 80%) and therefore can be improved so that they do not contribute to future similar events.

# Two other aspects of the MEDA philosophy

→ The **maintenance organization** must be viewed as a **system** and the maintenance **technician is one part** of the system, and

Experience showed that the **contributing factors to low cost/no injury** events were **the same** contributing factors to **high cost/personal injury** events.

→ addressing the contributing factors to lower-level events can prevent higher level events.

# The Safety Culture, and Just Culture principle

# The Safety Culture, and Just Culture principle

→ **SRM** is a process that is aimed at initial **control** of the **Practical Drift (PD)**.

**SRM/SMS cannot work without:**

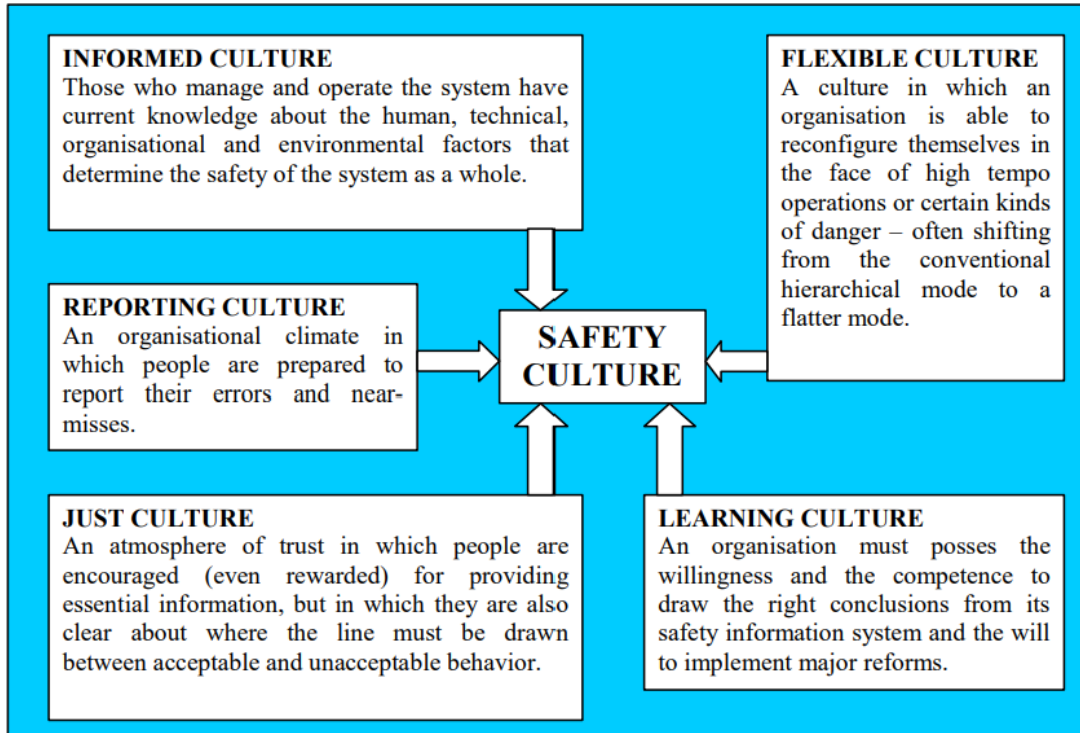
→ Acquisition of the greater amount possible of **data** reflecting what happens within the PD.

→ **Analysis** of the data to **extract information/intelligence**.

Basis for management decision-making on resources allocation/**prioritisation** to mitigate consequences of **hazards with higher safety risks**.

# The Safety Culture, and Just Culture principle

- Operational personnel are key for the management of safety
- Effective safety reporting needs a **trustworthy environment**.



# The Safety Culture, and Just Culture principle

- EAM 2 / GUI 6 – Establishment of ‘Just Culture’ Principles in ATM Safety Data Reporting and Assessment
- ICAO, 12<sup>th</sup> meeting of the Asia Pacific Regional Aviation Safety Team (APRAST/12), June 2018, WP11 Fostering Just Culture in Operators and Service Providers.
- EC’s Directorate-General for Mobility and Transport, Employers and staff representatives boost aviation safety by signing declaration on Just Culture, October 2015.

# The reporting guidelines and good practices

# Reporting beyond compliance: turning requirements into safety

## Why it matters and how to get it right



### Understanding the why

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- 1 Why do you report
- 2 Why does reporting matters



### Delivering meaningful reporting information

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- 3 When, what, to whom and how to report
- 4 How to write a meaningful, concise, yet complete report
- 5 How to follow-up and close an “open” occurrence report
- 6 How to technically submit an Occurrence report



### Practical aspects






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- 7 Addressing the TOP 5 quality issues

# Understanding the why









## Why do you report?

- Protecting others and preventing reoccurrence  **Respect**
- Sharing, supporting, and learning together  **Unity**
- Fulfilling our duty towards the community  **Integrity**
- Raising awareness and building trust  **Transparency**
- Growing through reflection and improvement  **Innovation**

# Understanding the why








## Why reporting matters

- Enables proactive safety management  **Prevention**
- Drives continuous safety improvement  **Improvement**
- Support evident-based decision-making  **Insight**
- Builds trust across the aviation community  **Trust**
- Turns experience into shared learning  **Learning**
- Goes beyond compliance  **Commitment**

# Delivering meaningful reporting information



## When, what, to whom and how to report

-  When to Report?
  - Within **72 hours** after assessing the occurrence as reportable
-  What information should be reported?
  - Use **AMC 20-8(a)** as your reference and make sure to complete all common and relevant specific mandatory fields. 
-  To Whom to Report?
  - Make sure to report to all relevant parties and identify those “informed parties”
-  How to Report? (Good writing practices)
  - **Necessary and factual information.** Keep it **simple, concise, and avoid duplication.** Quality matters more than quantity.



## Common and Specific Mandatory data fields

### 1-Common Mandatory Data Fields (R376/2014 – Annex I)

Attribute Name	Attr. ID
<a href="#">Headline</a>	601
<a href="#">Responsible Entity</a>	453
<a href="#">File Number</a>	452
<a href="#">Occurrence Status</a>	455
<a href="#">UTC Date</a>	477
<a href="#">State/Area of Occurrence</a>	454
<a href="#">Location of Occurrence</a>	440
<a href="#">Occurrence Class</a>	431
<a href="#">Occurrence Category</a>	430
<a href="#">Narrative Language</a>	424
<a href="#">Reporter's Language</a>	1091
<a href="#">Narrative Text</a>	425
<a href="#">Reporters Description</a>	1092
<a href="#">Event Type</a>	390
<a href="#">Risk Classification</a>	1065

### 2.1-Aircraft-related Data Fields (R376/2014 – Annex I)

Attribute Name	Attr. ID
<a href="#">Aircraft State of Registry</a>	281
<a href="#">Manufacturer/Model</a>	21
<a href="#">Aircraft Serial Number</a>	254
<a href="#">Aircraft Registration</a>	244
<a href="#">Aircraft Call Sign</a>	54
<a href="#">Operator Name</a>	215
<a href="#">Operation Type</a>	214
<a href="#">Aircraft Category</a>	32
<a href="#">Aircraft Propulsion Type</a>	232
<a href="#">Aircraft Mass Group</a>	319
<a href="#">Last Departure Point</a>	167
<a href="#">Planned Destination</a>	228
<a href="#">Flight Phase</a>	121
<a href="#">Weather Relevant</a>	606

### Aircraft Engine and Part Information Data Fields (EASA NBR & IR)

Attribute Name	Attr. ID
<a href="#">Engine Manufacturer Model</a>	387
<a href="#">Engine Serial Number</a>	881
<a href="#">Part Information Part Name</a>	485
<a href="#">Part Information Part Number</a>	486
<a href="#">Part Information Serial Number</a>	657
<a href="#">Part Information Manufacturer</a>	658
<a href="#">Part Information ATA Chapter Number</a>	659
<a href="#">Part Information Time Since Inspection</a>	662
<a href="#">Part Information Time Since New</a>	660
<a href="#">Part Information Time Since Overhaul</a>	661
<a href="#">Part Information Cycles Since New</a>	663
<a href="#">Part Information Cycles Since Overhaul</a>	664

### 2.4-Damage/Injury related Data Fields (R376/2014 – Annex I)

Attribute Name	Attr. ID
<a href="#">Damage Severity Level</a>	432
<a href="#">Injury Severity Level</a>	451
<a href="#">Number of Injuries on Ground</a>	460, 472, 469
<a href="#">Number of Injuries on Aircraft</a>	459, 468, 471



#### Useful links:

- [ECCAIRS Coding Guide](#)
- [ECCAIRS 2 taxonomy browser](#)

### Reporting History Data Fields (EASA NBR & IR)

Attribute Name	Attr. ID
<a href="#">Reporting entity</a>	447
<a href="#">Reporting entity approval number/name</a>	




#### Legend:


- R376/2014 – Annex I
- EASA NBR & IR




## How to write a report?

-  Purpose
  - To describe the occurrence so that someone who was not present can clearly understand what happened, why, and what actions followed.

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-  Writing Guidelines
  - 1 **Be clear and factual** – simple language, no opinions or assumptions.
  - 2 **Keep it concise but complete** – include all relevant facts, omit repetition.
  - 3 **Explain acronyms** – spell out the first use
  - 4 **Describe technical issues precisely** – note component name, position, and identifiers.
  - 5 **Use attachments to support, not replace, the text** – reference them (Attachment 1, 2...)
  - 6 **Build a short and clear narrative** – *Before* → *During* → *After* → *Result* → *Learning*.
  - 7 **Aim for efficiency and avoid duplication** – clarity helps analysts process and act faster.


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-  Remember
  - Simple • Structured • Understandable • Actionable

# Delivering meaningful reporting information



## How to follow-up and close an “open” occurrence report 1/2

-  Purpose
  - To inform the authority on the progress and findings of the occurrence investigation
  - Demonstrate that all identified causes have been addressed and the safety deficiency/-ies has been fully corrected.

-  When

If occurrence report is submitted with an “open” status:

  - A follow-up is due within 30 days - must contain preliminary results of the internal investigation.
  - A closure report is due within 90 days - must contain the final results of the internal investigation.

 *Clearly highlight **what is new or updated**, so the Authority can quickly identify new elements.*

# Delivering meaningful reporting information



## How to follow-up and close an “open” occurrence report 2/2

- What It Should Contain?

- ① Investigation summary – new or updated data collected and analysis performed.
- ② Root cause(s) – underlying reasons beyond the immediate issue.
- ③ Corrective & mitigating actions – actions taken, responsible persons, completion dates.
- ④ Risk assessment – updated evaluation of residual risk after actions.
- ⑤ Closure statement – clear status (closed / ongoing / cannot be completed).

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- Closing the loop

- The follow-up content is submitted for review and agreement of EASA (i.e. MOA TL)
- *turning data into understanding, and understanding into prevention*

# Delivering meaningful reporting information



## How to technically submit an Occurrence report

Previous webinar content remains relevant:

- [ECCAIRS 2 Aviation reporting portal](#)
  - [How to become an E2 registered organization](#)
  - [Data quality challenges](#)
-



## Address the TOP 5 Quality issue

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Make sure to:

- 1 Report with your MO E2 registration credentials
- 2 Identify Aircraft, engine, component model(s) information
- 3 Identify all other informed parties
- 4 Complete all relevant attributes: even if support information is in the attachment, ensure the information is provided in the dedicated field for proper processing.
- 5 Attach any relevant document mentioned in the text



## Remember



*Good data quality shortens processing time, clarifies what happened, turns information into actionable intelligence, and ensures that resources are focused where they are truly needed.*

# Resources, 1 of 2

- EASA Regulations Library: [Regulations | EASA](#)
- EASA resources for [Foreign Part-145 Organizations](#).
- Easy Access Rules for Acceptable Means of Compliance for Airworthiness of Products, Parts and Appliances ([AMC-20-8A](#))
- [ICAO Safety Management Manual Doc 9859](#), 4th edition
- [ICAO Guidance Materials](#). (accessed on 02-Oct-2025)

## Resources, 2 of 2

- ICAO paper, Safety Risk Management (SRM) Methodologies, Aviation Risk Management Solutions (ARMS) and Event Risk Classification (ERC) Version 1.0 – January 2024
- Maintenance Error Decision Aid (MEDA) Users Guide, and Results Form, accessed on 02-Oct-2025.
- International Federation of Air Traffic Controllers' Association (IFATCA), Working Paper WP No: 15, Study of Positive Safety Culture and Just Culture.
- Air Traffic Controllers European Unions Coordination's Just Culture Toolbox brochure, 2018.
- Insley, J.; Turkoglu, C. A Contemporary Analysis of Aircraft Maintenance-Related Accidents and Serious Incidents. *Aerospace* **2020**, 7, 81.  
<https://doi.org/10.3390/aerospace7060081>

# SLIDO questions

→ Your questions have been grouped by theme

# After the webinar

- The webinar will be posted on the EASA internet
  - Answers to all SLIDO questions will also be posted within 7 working days
  - All registered participants will be E-mailed the details
  
- Also available on Youtube

# Thank you for your attention

[easa.europa.eu/connect](https://easa.europa.eu/connect)



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An Agency of the European Union 