MINUTES OF MEETING
EASA MRB Workshop
8th-10th March 2016
EASA Headquartes, Cologne

Organised by	**EASA / FLIGHT STANDARDS DIRECTORATE / MAINTENANCE AND PRODUCTION DEPARTMENT / MRB SECTION**

List of Participants	
Attendees	Refer to the attached Attendance List. In addition from the EASA Certification Directorate: *Alain LEROY* – Head of Large Aeroplanes Department *Richard MINTER* – Chief Expert, Airframe, EASA Certification Director's Office *Markus JANISCHOWSKY* – Senior Expert, EASA Instructions for Continued Airworthiness & PCM
Apologies	*Julian HALL* – Head of EASA Maintenance & Production Department *Francesca TANZI* – EASA MRB Expert *Federico HITA* – AIRBUS DEFENCE AND SPACE *Nilsson LARS-GUNNAR* – SAAB *Nathalie FIGUE* – ATR *Rolf VAN GELDER* – FOKKER *Wilfried MIGNERAT* – HOP! *Vasco ARAUJO* – VINAIR *Sergio GIOIA* – ALITALIA *Erla DÖGG HARALDSDÓTTIR* – ICELANDAIR *Jérôme MARX* – MONACAIR *Chris RICHARDS* – BRISTOW HELICOPTERS *Yousouf BHEEKHUN* – BRITISH AIRWAYS *Eugene QUIGLEY* – CITYJET *Stuart ALEXANDER* – LOGANAIR *Wolfgang KRAUS* – AUSTRIAN AIRLINES *Frank LAURENSSEN* – KLM *Alain ESCHENBRENNER* – AIRFRANCE

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AGENDA	
DAY 1	
1.1	INTRODUCTION
1.2	EVOLUTION OF THE MRB WORKSHOP / AGENDA REVIEW
1.3	NEW ORGANIZATION / MOVE 2016
1.4	REVIEW OF ACTION ITEMS FROM PREVIOUS ANNUAL CHAIR MEETINGS
1.5.A	MRB FUTURE DEVELOPMENTS: EU/USA BASA
1.5.B	MRB FUTURE DEVELOPMENTS: DOA PRIVILEGES (INCLUDING LOI, LOP)
1.5.C	MRB FUTURE DEVELOPMENTS: DATA MODULE CONCEPT – IMPACT ON MRBR APPROVAL
1.5.D	MRB FUTURE DEVELOPMENTS: IMRBPB/IMPS
1.6	MRB TEAM MEETING
1.7	CANDIDATE ISSUE PAPERS LIST FOR THE 2016 IMRBPB (GENERAL PRESENTATION)
	AOB, Q&A
DAY 2	
2.1	CANDIDATE ISSUE PAPERS FOR THE 2016 IMRBPB (DISCUSSION ON IND CIPs)
2.2	CANDIDATE ISSUE PAPERS FOR THE 2016 IMRBPB (DISCUSSION ON EASA CIPs)
2.3	MAINTENANCE PROGRAMS INDUSTRY GROUP (MPIG)
2.4	HANDLING OF FATIGUE DAMAGE WITHIN MSG-3
2.5	HANDLING OF 'RESTORATION' TASKS COMING OUT OF MSG-3 LOGIC
2.6	CPCP
2.7	AGEING AIRCRAFT STRUCTURES / WFD AND LOV / LARGE AEROPLANE REQUIREMENTS
	AOB, Q&A
DAY 3	
3.1	IMPLEMENTATION OF NEW MRB TASKS
3.2	HYDROSTATIC TESTING / RE-QUALIFICATION OF PRESSURE CYLINDERS
3.3	MDM.056 (RMT.0252) - INSTRUCTIONS FOR CONTINUING AIRWORTHINESS (ICA) - STATUS
	AOB, Q&A
	FEEDBACK & PROPOSALS FOR THE NEXT EASA MRB WORKSHOP
	2016 EASA MRB WORKSHOP CLOSURE

MoM Distribution: To Attendees		
MoM prepared by	Antonino LEVANTINO	**Date** 18-May-2015
MoM reviewed by	Mark KIEFT	**Date** 18-May-2015

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1.1 INTRODUCTION

Presented by: Alain LEROY - Head of Large Aeroplanes Department

Mr. Julian Hall was not able to open the workshop and Mr. Alain LEROY welcomed the attendees.
EASA re-organization has been presented explaining the function of each department. MRB Section has been recently moved again from Certification Directorate to Flight Standards Directorate. MRB is still a service. EASA is trying to introduce new concepts: Bilateral Agreements, DOA Privileges. The idea is to reduce costs for the Industry and to optimize the use of resources in order to improve the efficiency. We are going to the direction of "Primary Authority" concept to avoid duplication of activities. At the Sept COB we should present some proposals in order to implement the Bilateral Agreement (TIP). Same idea for the DOA Privileges. We should rely on the manufacturers for some "routine" tasks and concentrate the Regulatory job on "non-routine" tasks. Today there are very well advanced pilot projects. This EASA MRB workshop is a new format with operators' participation due to their "active" involvement in the MRB process. EASA CT and FS have to work together to meet the industry expectation. Input from industry are extremely welcomed.

No questions/comments from the attendees.

1.2 EVOLUTION OF THE MRB WORKSHOP / AGENDA REVIEW

Presented by: Mark KIEFT - EASA MRB Section Manager

Evolution of the Workshop has been presented. It was previously called the "Annual Chair Meeting". The main scope was to harmonize/standardize the EASA MRB Chairs as most were not EASA staff but employed by the EU NAA's. Now as all the Chairpersons' work has been internalised the standardisation issue is not so significant and this workshop can be used to discuss problems faced by industry as well as using their experience to help on technical issues presented.
No Operators have been involved in the past. It has been decided to evolve and to have all parties involved in the MRB process attending this workshop. This format of meeting will allow the operators' voice to be heard and to use their expertise during the technical areas of the discussions taking place during the course of the meeting. The workshop is open to EU manufactures and operators involved in EU and non-EU projects.

Review of the Agenda.
Mark showed the content of the Agenda and introduced briefly all topics.
He reminded the importance to provide feedback following the workshop (through the form provided).

Round the table: All attendees introduced him/herself (company, position, background).

No questions/comments from the attendees.

1.3 NEW ORGANIZATION / MOVE 2016

Presented by: Mark KIEFT - EASA MRB Section Manager

EASA post-convergence reorganisation including the reasons have been illustrated. Mark covered the Agency's move to the new building and the expected advantages.

Mark suggested the placement of EASA MRB experts in operators' environment (On the Job Training) to gain experience of the use of MRB data in the generation of a working AMP. Some operators were very keen to offer places. They will look for opportunities for EASA MRB Experts in operators' environment.

Q&A:

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Airbus: the MRB section in the organigram appears as a single box under CAW? Is the MRB Section belonging to the Continuing Airworthiness Section?

Mark Kieft: today the MRB Section is a separated section

Airbus: the FAA AEG is also involved in Continuing Airworthiness activity (20% of AEG activity is related to MRB, 80% is related to CAW). This is limiting the expertise of the EASA MRB Section. Is EASA going to mirror the AEG approach?

Mark Kieft: today the MRB Section is separated. In addition we have also NAAs and DOAs that are different to the FAA system. We understand the FAA AEG approach is good but we also see some limits.

Airbus: looking for opportunities for EASA MRB experts in operators' environment. What about opportunities for the NAAs? More understanding of what happens in the field on regards of NAAs.

Mark Kieft: being in the EASA Standardization Section, he could say EASA's knowledge of the NAAs world is improved.

Aer Lingus: supported the suggestion to place EASA MRB experts in the operators' working environment but also expressed a concern in the apparent lack of practical experience in MSG-3 work and AMP approval process among the local NAA community.

Thomson Airways: stated they have experienced many issues as they also have the added complication of dealing with several NAA's and a mixed fleet.

KLM: suggested the NAA training could be added to the scope of B section of part M.

Mark Kieft: good feedback from operators. Acknowledged the existence of a potential lack of MSG-3 awareness among the NAAs but warned against any change to Part M, that had been left particularly flexible to allow operators space to tailor the requirement to meet their operational need whilst being able to demonstrate compliance. Harmonization of the rule in the NAAs is the role of the EASA Standardization Dept.

1.4 REVIEW OF ACTION ITEMS FROM PREVIOUS ANNUAL CHAIR MEETINGS

Presented by: Ralf SCHNEIDER - EASA MRB Expert

All open action items from the previous Annual Chairs' meetings have been closed.

No questions/comments from the attendees.

1.5.A MRB FUTURE DEVELOPMENTS: EU/USA BASA

Presented by: Raffaele IOVINELLA - EASA MRB Expert

Today there is an advanced status for the EU/USA BASA and it will be launched for other projects where several Regulators are currently involved as approving Authorities (e.g. TCAA, ANAC). There have been some difficulties and a lot of concerns in the past but now the EU/US BASA is going well. EASA is now leading the task. TIP para 2.4.3 amendment proposal will undergo internal EASA and FAA review.

Q&A:

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Flybe: what about different requirements from FAA, EASA and other regulatory Authorities (e.g. National Requirements)?

Raffaele Iovinella: in the future EASA will approve EU products and an Appendix will be used to include different regulatory requirements.

Airbus: the MSG-3 logic should be followed and not forcing National Requirements into the MRBR. This approach should minimize the differences in the MRBRs.

Alain Leroy: today we have a lot of experience related to reciprocal acceptance at Certification level (e.g. TSO). Special Conditions are used in order to clearly identify and approve different requirements within the involved regulatory authorities. Both parties are used to look for pragmatic solutions in solving regulatory differences to keep problems to a minimum. The system allows for differences to exist while allowing the document to be used by industry.

Airbus: does the TCH need to provide the MSG-3 analyses to the FAA?

Raffaele Iovinella: if the FAA asks for MSG-3 analyses as supporting data, data should be provided upon request

Alain Leroy: there will be reciprocal acceptance. Once the bilateral has been signed, the data will be asked for sampling but not for challenging. We have to monitor the mutual recognition processes and not the tasks. Of course conflicts should be solved. Today this concept is just valid for the EU/US BASA. It will be easier to work on the BASA with TCCA and ANAC as soon as the BASA with USA is finalized.

1.5.B MRB FUTURE DEVELOPMENTS: DOA PRIVILEGES (INCLUDING LOI, LOP)

Presented by: Colin LANGLEY - EASA MRB Expert

List of Routine/ Non-Routine tasks should be considered as a living document for the time being.

Q&A:

FedEx: EASA is transferring a lot of responsibility to the TCH but the NAAs are not enough competent related to MRB activity. With DOA privileges concept we will lose the expertise of operators involved in the MRB process as well as the EASA expertise. Suggestion for a standardization training within the NAAs due to significant standardisation differences within the 28 NAAs and lack of competences. The differences in knowledges among the NAAs are huge.

Colin Langley: we are talking about the MRB process and not AMP. There is no change from the today process related to AMP.

Mark Kieft: DOAs are directly approved by EASA. When the system will be in place the control will be directly performed by EASA.

Fokker: is the DOA an EASA only concept?

Alan Leroy: yes, it is. DOA concept at the beginning was even “negated” by FAA. A lot of meetings to make it clear. Now the FAA understand the DOA concept at Certification level. One of the bases of the bilateral is the no-challenging of each-other system in place as per today. This concept should be applied to other domains including the MRB.

328 Support: should DOA develop a CVE?

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Airbus: today the MRB Advisors & Chairs are doing more than a check of procedures. There is a valuable technical input. Is the CVE not really expected to bring any technical know-how into the discussion?

Colin Langley: EASA is expecting the companies to have competences in place, it is not checking each single organization.

Airbus: today the MRB contents come from the joint ISC (including regulators input). There will be a time where the competences of the CVE should be clearly defined. Despite the competence of the company in ICAs, the proposed MRB input is overcome by the ISC. It is clear that the added technical value of the MRB team will not be any more in place.

Desnair: will the operators decide their LOP?

Mark Kieft: yes, they will. Different proposed mods will drive to a different LOP.

Aer Lingus: the operators will not have the support of regulators in front of DOA decisions (e.g. sampling)

Mark Kieft: DOAs should do what they are allowed to do. Today the list of routine tasks is quite limited.

Raffaele Iovinella: a sampling will not be implemented w/o EASA being aware of it

NOTE: more time should have been spent on this area as it was the first time the operators had seen the proposed MRB under DOA concept.

1.5.C MRB FUTURE DEVELOPMENTS: DATA MODULE CONCEPT – IMPACT ON MRBR APPROVAL

Presented by: Mark KIEFT - EASA MRB Section Manager

Manufacturers are introducing the concept of 'data package' approval (based on the ATA S1000D and the 'Single Maintenance Data Source' concept). This will change the approval process for MRBR from large and infrequent revisions, to small frequent data package approvals. Future MRBR revisions will therefore consist of a list of individually approved tasks.
The MRB process will need to adapt from the approval of infrequent major revisions, to the approval of frequent minor data packages. Operators will only refer to the repository to find the scheduled maintenance source information.

Q&A:

Airbus: thanks to EASA for supporting this initiative. A few issues to be still resolved. Operators do not like to update their manuals every day, so how often will the NAAs require data updating? In addition the TCHs could delay the publication of mods (ALSs & CMRs mainly): how long could the tasks publication be delayed? This should be discussed and clarified at MRB & Certification level. DM concept is driven by IATA and the MRB will need to be adapted to this concept. IATA needs more participations to develop the DM concept and to find solutions.

KLM City: what about updating of task procedures?

Mark Kieft: database will contain tasks information but not the way to perform the tasks. Task procedures should be updated quite easily on a daily basis. Today the TCH is producing the MRBR but the AMP is managed at a different level and time.

Thomson: has this concept been discussed with the FAA?

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Airbus: CIP discussed at IMRBPB level. The FAA is aware and involved, but not yet committed with resources to make it happen.

Airbus: the MROs will not be directly allowed to download the mods. The point is still how often will the operators be required to update the AMP downloading the data.

Frederic Gasztowtt: Bombardier is already putting the DM concept in place.

Aer Lingus: how will the revision status be provided? The summary of changes should be available.

Frederic Gasztowtt: colour code will highlight the changes, and there will be an approval letter per data module

Thomson: how will the MRB tasks vs CMR tasks be managed?

Airbus: the most severe task interval should be considered by operators. No consolidation will be provided by the TCH.

1.5.D MRB FUTURE DEVELOPMENTS: IMRBPB/IMPS

Presented by: Frederic GASZTOWTT - EASA MRB Expert

Frederic Gasztowtt provided general info on the IMRBPB and feedback on the IMPS (International MRB Process Standard) development.

Q&A:

Airbus: a lot of inputs to TCCA from FAA & EASA. IMPS approval in April is rather ambitious. Last slide says "replacing EASA, FAA & TCCA docs" but the IMPS has no legal basis, therefore how will the existing regulatory docs be updated to reflect the international process?

Mark Kieft: agenda item for the upcoming IMRBPB in April is "how to implement the IMPS".

Airbus: will the IMPS be considered equivalent to an AC doc?

Mark Kieft: how to implement the IMPS has to be decided. TCAA and EASA will probably replace their own guidance, FAA will probably make a reference to the IMPS on their AC doc. Implementation is still open.

1.6 MRB TEAM MEETING

Presented by: Luca TOSINI - EASA MRB Expert

Luca Tosini provided general info and feedback on the EASA MRB Team Meeting.

Q&A:

Questions were again raised regarding the competancy of NAAs reviewing the MSG-3 process in the escalation of the operators' AMP. More NAAs should attend this meeting because they have lack of experience on MRB activity.

Luca Tosini/Mark Kieft: the NAAs participating in the MRB Team Meeting are today working for the MRB activity on behalf of EASA with contracts in place.

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1.7 CANDIDATE ISSUE PAPERS LIST FOR THE 2016 IMRBPB (GENERAL PRESENTATION)
Presented by: Frederic GASZTOWTT - EASA MRB Expert

Frederic Gasztowtt provided a brief presentation about EASA CIPs, since detailed discussion was planned on Agenda for the following day.

No questions/comments from the attendees.

AOB, Q&A
Presented by: All

Operators again showed they have a lot of issue with the NAAs. NAAs have different approaches and they do not trust the operators although the operators have a lot of experiences. Operators asked EASA to push in order to standardize the NAAs approaches.

Fedex: NAAs requirement to approve an MPD seems redundant. Sometimes create many issues. EASA should push for some steps further.

KLM City: the NED Authority allows any change in the MRBR to be immediately implemented. KLM is going to the NAA just for approving escalations.

Mark Kieft: feedback recorded. EASA cannot just change the rules like that. Rules could be changed at Rulemaking level but these changes are driven by the Member States and rulemaking advisory bodies.

Aer Lingus: question related to DOA, why is "Validating Authority" terminology used?

Raffaele Iovinella: agreed on the comment but there are a few legal restrictions.

NOTE: due to the time overrun attendees were requested to make notes of any questions they had and present them the following day.

2.1 CANDIDATE ISSUE PAPERS FOR THE 2016 IMRBPB (DISCUSSION ON IND CIPs)
Presented by: Tony HARBOTTLE - Airbus SAS & MPIG Chair
Christophe CHAZOT - AIRBUS HEL

CIP IND-2016-01 Wear Damage Detection Task.
Tony Harbottle went through the CIP.

Q&A:

Frederic Gasztowtt: the today definitions are already fulfilling the needs. It seems the proposal will drive the TCHs to select an SDI for wear.

Tony Harbottle: it is not suggested to perform a quantitative task every time we have to check for wear. A DET could still be an applicable/effective task if you have not to "measure" but just check for evidence of wear.

Raffaele Iovinella: the reference to a generic "measuring tool" could be misunderstood.

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Tony Harbottle: we needed to keep it simple. We are referring to SDI typically used in STR and a very few times in SYS (where GVI or DET are used). So, if we are talking about structures, the "measuring tool" could practically be a micrometre.

Raffaele Iovinella: better to specify the "measuring tool" rather than generically referring to it.

Ralf Schneider: in the definition a dedicated example could be preferable but "measuring tool" is still valid (both solutions are valid).

Frederic Gasztowtt: to inspect just for presence of wear, the today definitions are ok. If the intent is to "measure" the wear, the STR WG could transfer it to the SYS WG to look for a FNC.

Tony Harbottle: we force the STR WG to transfer the task to the SYS WG. This proposal is just for the benefit of the operators. It describes what the common practice in operations is.

Fedex: we support the MPIG recommended changes. It is a very practical approach. Wear measurement should be managed by STR WG (no transfer to SYS WG).

Colin Langley: task intent should be included in the AMM. RST is an example of task where the intent is clearly identified.

Tony Harbottle: agreed that task intent should be clarified at task title level.

CIP-IND-2016-02 MSG-3 training to support maintenance program optimisation
Tony Harbottle went through the CIP.

Q&A:

Fokker: we fully support the intent of this CIP, thinking if the MSG-3 doc is appropriate.

Cecile Ben Mami: MSG-3 doc doesn't seem the proper document.

Tony Harbottle: this was initially the MPIG position as well. Delta Airlines has a very strong belief that they have made errors in escalating/deleting tasks in the past (especially for hidden FEC where they escalated tasks simply considering the primary failure and not an additional failure).

Raffaele Iovinella: failure of the NAA should be considered as well

Tony Harbottle: if the NAA does not understand MSG-3 it is a bigger problem.

Cecile Ben Mami: MSG-3 doc is not for an OMP development.

Lufthansa: training is always good. LHT has made MSG-3 training for several years. There is lack of knowledge from NAA side as well. We suggest putting the training into Part M.

Aer Lingus: operators' version of IP44 that provides some guidelines to perform an optimization process at local level (not by the TCH) using MSG-3 could be very useful. NAA could follow specific guidelines approved at EASA level.

Tony Harbottle: not sure MPIG is the right community to discuss this suggestion, even if well understood

Fedex: disagree on the selection of the MSG-3 as document to address the issue. Better if EASA take it through Part 66.

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Tony Harbottle: we are trying to encourage this proposal enters in a regulatory document.

Cecile Ben Mami: is this a recommendation to authorities? People not involved in the MSG-3 process will never read the MSG-3 doc.

Tony Harbottle: it is purely an encouragement

Luca Tosini: MSG-3 training is generic. Is the original MSG-3 analysis provided to any operators not involved in WGs/ISCs upon request? To understand the MSG-3 logic implies to have the opportunity to look at the original analysis.

Fokker: to WG/ISC members only

Agusta: to WG/ISC members only that sign a non-disclosure agreement

BAE: to WG/ISC members only

Airbus Hel: to operators involved in the MRB process

ATR: do not publish MSG-3 analysis. MSG-3 analysis is supplied only to WG/ISC members. ATR received some requests related to it.

SAAB: to WG/ISC members that sign a non-disclosure agreement

Tony Harbottle: MSIs/SSIs contain a lot of data required by WG to make a robust decision. This level of data has a lot of intellectual property. Operators request sets of data on MSG-3 analysis. Airbus is not directly providing the MSG-3 analysis but provides specific answers to specific questions. The complete MSG-3 dossiers are not even disclosed to the WG/ISC members.

Lufthansa: the MRBR is an industry document but not the MSG-3 analysis. We spend a lot of money to participate in the optimization of the MRBR so at least access to MSG-3 data should be provided to the WG members.

Fokker: is it allowed to put a remark in the MRBR saying that in order to amend the OMP (e.g. task interval escalation) it is encouraged to follow an MSG-3 training?

Frederic Gasztowtt: yes it is, but in an Appendix that will not be approved by EASA

KLM City: we suggest to include this statement in the MPD

CIP IND-2015-08 CriticalProtection
Tony Harbottle went through the CIP.

NOTE: this CIP was already reviewed during the IMRBPB in Tokyo.

There was no discussion on this CIP.

CIP IND 2015-10 'Maintenance functions' definition
Tony Harbottle went through the CIP.

NOTE: this CIP was already reviewed during the IMRBPB in Tokyo.

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Q&A:

Frederic Gasztowtt: why to exclude questions on MSI selection? it seems that the CIP goes in the direction of excluding a priori some items. We disagree.

Antonino Levantino: the function of operating a simple door to a component as example of maintenance function that doesn't need to be analysed is not a valid example. The waste service panel example has been provided. Fails to open this panel may have an effect on Operating Capability as analysed by some manufacturers.

Tony Harbottle: the last sentence related to "access panel" could be changed to say "may not be analyzed" in lieu of "do not need to be analyzed"

Luca Tosini: we have example of maintenance functions not analysed that failed and caused fatal incidents

Tony Harbottle: anyway this is an EASA issue. No issue from TCAA and FAA. We will see the position of the other regulators at the PB. We need EASA help on this topic. Suggestion for an action item to be raised for EASA to help on making a statement regarding whether maintenance functions should be part of the MSG-3 analysis of the aircraft.

Frederic Gasztowtt: IP104's intention was not to separately define 'maintenance functions', but rather to ensure all functions of a system are reviewed (i.e. we were trying to stop the cases where certain functions were excluded from the questions because they were considered maintenance functions).

Post-Workshop NOTE: this topic has been discussed at the IMRBPB and there is an Action Item at PB level.

CIPR IND 2015-01 Supplemental analysis rotor and drive systems
Christophe Chazot went through the CIP.

The proposed flow chart was not correct. Blocks D2 & D3 should be inverted. CIP will be reworded and resubmitted.

There was no discussion on this CIP.

2.2 CANDIDATE ISSUE PAPERS FOR THE 2016 IMRBPB (DISCUSSION ON EASA CIPs)
Presented by: Responsible EASA MRB Experts

CIP EASA-2016-01 Power-up Built-In Tests (PBITs)
Antonino Levantino went through the CIP.

Q&A:

Airbus: there isn't yet an MPIG position. Airbus position: additional note concerning the evidency of the failure doesn't seem necessary. MSG-3 rules already address it properly. For hidden route, the Hidden Function Safety Effects paragraph already takes care of this situation. Why do we need this CIP?

Antonino Levantino: it is not an approach systematically followed by all the manufacturers.

Airbus: the reference to the AFM seems going a bit too far.

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Raffaele Iovinella: in the approved part of the Dassault AFM there is a reference to the A/C de-powering to ensure the test is carried out on a daily basis.

Airbus: for business jets where the A/C de-powering is not in the AFM, which other means do we have to verify the assumptions?

Frederic Gasztowtt: it is like all the other assumptions

Airbus: how will you force the OEM to put info in the AFM?

Raffaele Iovinella: this is not the intent of this CIP

KLM: why "on a daily basis"?

Antonino Levantino: per MSG-3 requirement at level I analysis

CIP EASA-2016-02 MRBR Temporary Revisions Policy
Luca Tosini went through the CIP.

Q&A:

Airbus: TRs management is not a new issue. TR are often forced by the FAA approach that asks for Task Validation before the EIS. We do not have other means to create ICAs not only for safety topics. The only way to release ICAs is a TR. We reject the possible idea of a restriction on the number of TRs the TCHs would be able to issue as they are often required to enable the TCHs to complete the delivery of aircraft where the customisation demanded by the operators prevents the modifications from being incorporated into the normal ICAs prior to delivery. This CIP is an EASA position only. If we found another way to release the tasks we are killing the MRB process.

Frederic Gasztowtt: we have to define the use of TR otherwise TCH could release the complete initial MRBR using a TR

Airbus: TCH is not quick enough to release all tasks through the MRB process. This is the reason why the TR process is needed.

Frederic Gasztowtt: we have some TCHs that release TRs every two months. We have to limit this approach and define a balanced approach.

Some operators: the ISC Chairperson is also responsible to approve the TR.

Luca Tosini: the ISC Chairperson input is valid but the complete WG/ISC inputs are missing and for some TRs discussion at WG/ISC level is really needed.

Some operators: in this case EASA could reject a TR.

Airbus: there are a few points that need to be still clarified. Is the "safety" definition just CAT 5 or 8? "Safety" definition is not sufficient. There is no reference to CPCP tasks. Is a CPCP task considered a safety topic? What about the task interval accomplishment in order to consider a TR as safety topic? We suggest to move the discussion at PB level.

CIP EASA-2016-03 MRBR Annual Review
Frederic Gasztowtt went through the CIP.

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Q&A:

KLM City: other names than “Annual Review”? Who are the attendees if it is not an ISC?

Mark Kieft: it is already specified in the IMPS

Frederic Gasztowtt: TCH could decide to use the face-to-face ISC or simply a WebEx

Raffaele Iovinella: to make it clear there is no requirement for a face-to-face meeting

SAAB: is it possible to take actions in this meeting that can influence the MRBR?

Frederic Gasztowtt: yes it is, on case by case.

SAAB: is the ISC Chairperson in that case representing the operators?

Frederic Gasztowtt: yes it is, similarly to TRs concept

Germanwings: what does “Annual” mean?

Frederic Gasztowtt: flexibility should be provided on the “Annual” concept.

Airbus: CIP not discussed yet at MPIG level. From Airbus side no additional comments. CIP is already in line with the Airbus approach. There will be discussion at PB level.

Aer Lingus: what is the source of having an “Annual Review”?

Airbus: this is already in the MRB process. At least an annual review is expected to take place. It is historically in all documents.

Airbus Hel: we do not see the added value of this annual review for aging a/c.

Frederic Gasztowtt: e.g. to have visibility that the original assumptions are still in place. In some cases there might be no actions following this annual review.

CIP EASA-2016-04 Description of Scheduled and Non-Scheduled Maintenance
Colin Langley went through the CIP.

Q&A:

Airbus: happy that non-scheduled references are going to be removed from MSG-3. We suggest to remove the “Historically” word from the CIP to be fair with the expected attendees that will discuss it. This proposal is justified.

Lufthansa: performing an evolution at local level, non-scheduled maintenance findings are considered as well. The non-scheduled maintenance definition seems to be valuable somehow.

Airbus: IP44 is taking care for that aspect. MSG-3 does not take care for evolution. LHT point is addressed at IP44 level. The proposal is the removal of non-scheduled maintenance from MSG-3.

Lufthansa: developing a new MRB program, considering unscheduled maintenance for similar systems/aircrafts could be considered valuable

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Airbus: this is already considered within the MRB process as “experience” to be put on the table.

Airbus Hel: reference to unscheduled maintenance in the current MSG-3 seems going back to the conversion from MSG-2 (with the “On-Condition” concept) to MSG-3.

Ralf Schneider: reference to “preventive maintenance” throughout the MSG-3 document is not consistent.

Airbus: this is not related to the current CIP

2.3 MAINTENANCE PROGRAMS INDUSTRY GROUP (MPIG)

Presented by: Tony HARBOTTLE - Airbus SAS & MPIG Chair

Tony Harbottle, on behalf of A4A, provided general info and feedback on the MPIG activity.

There was no discussion on this presentation.

2.4 HANDLING OF FATIGUE DAMAGE WITHIN MSG-3

Presented by: Tony HARBOTTLE - Airbus SAS & MPIG Chair

Tony Harbottle provided a verbal background about the status of Fatigue Damage within MSG-3, since no presentation was prepared for the meeting.

The MSG-3 requires Fatigue Analysis on all SSIs. Fatigue is also managed at Certification level and there is a duplication of effort and tasks. It is acceptable that PSEs are covered by Certification and not via MSG-3. Today the issue is related to SSIs non-PSEs and the different interpretations at international level. US World interpreted there was no need of Fatigue analysis at all (PSEs and non-PSEs). Airbus is covering SSIs non-PSE via the MSG-3. There was an MPIG Structures WG in place for this topic but the result of this WG has been rejected. Airbus required EASA to provide references to EU regulations related to Fatigue on non-PSEs. EASA provided the explanation there is no EU requirement other than the MSG-3 logic. Since the MSG-3 is an IND document, IND could change the MSG-3 in order to remove the requirement of Fatigue analysis. From MPIG side the goal is to find a common position.

Q&A:

Ralf Schneider: If IND is able to demonstrate there is no safety issue we could accept the proposal to not perform the fatigue analysis on non-PSEs although economic considerations should also be taken into account.

Frederic Gasztowtt: do not forget the “Safety” definition from Certification and MSG-3 logic is completely different. So we have to be careful to just stick to CS 25.571. In addition, MPIG Structures WG was missing North American manufacturers and they didn’t contribute to it.

Tony Harbottle: the initial position of the Structures WG changed due to a different position at PB level of a major manufacturer that claim that fatigue concerns are covered by AD, ED and Zonal.

Frederic Gasztowtt: we should assure that for existing programs the MSG-3 logic is followed.

2.5 HANDLING OF ‘RESTORATION’ TASKS COMING OUT OF MSG-3 LOGIC

Presented by: Tony HARBOTTLE - Airbus SAS & MPIG Chair

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Tony Harbottle provided feedback on the Restoration Tasks in MSG-3, questioning wether is it really useful to require that MRB Task Description outlines the minimum workshop requirement or is it acceptable for MSG-3 logic to identify the minimum requirement but the Task Description simply requires the component to be removed for restoration.

Q&A:

Mark Kieft: the two options don't fix the problem. The operator should clearly identify the maintenance task to be performed and when the part comes back they should be sure the maintenance task per MSG-3 has been accomplished.

Tony Harbottle: Operators input is essential. We do not know the solution yet. Today there is a no harmonized position.

Lufthansa: we confirm and agree with the position of Tony. How can the term "Restoration" be translated on to a release document?

Mark Kieft: reminded the attendees of the terms of approval of Part 145 regarding the use of the EASA Form 1 and what can be used in the various boxes to complete the form correctly and with in the current regulations. Operators were reminded of the correct use of the Work Order to ensure the part receives the correct maintenance action and it is released in accordance with the applicable ICA for the respected aircraft/component.

Tony Harbottle: I think this is not done in the real field

FedEx: we confirm there are no traceability of part and job done on the returned part for installation.

2.6 CPCP
2.7 AGEING A/C STRUCTURES/WFD AND LOV/LARGE AEROPLANE REQUIREMENTS
Presented by: Richard Minter, Chief Expert – Airframe, EASA Certification Director's Office

Richard Minter provided feedback on the background and the future developments around CPCP and Aircraft Structures Ageing.

Q&A:

Cecile Ben Mami: what is the meaning of "between" in the last bullet of the new CPCP definition?

Richard Minter: it is still an open issue, even if the intent is clear from a reverse engineering perspective.

Operator: "environmental" word is missing.

Richard Minter: It's not a case.

Airbus: we still keep the "damage" word in the first two bullets because it was originally written like that. We will probably take care of it at AWG level.

Operator: If there's no specific concern, you should be consistent in wording.

Operator: I assume many EU TCHs already comply with FAA regulations. Shall we again duplicate data?

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Richard Minter: I think we'll get benefit of already existing and provided data. We may do a sample but pretty much we'll go for a quick straightforward acceptance.

BAE: how to escalate non MSG-3 generated CPCP requirements? Any guidance?

Richard Minter: when I was in NAA it was done on a case by case basis. It should be discussed at local NAA level.

Airbus: Under FAA there's no reporting requirement, so difficult for us to get reports outside EU. Under BASA discussions, is EASA putting pressure in this direction? At the moment we're indeed isolated on that aspect. FAA agreed on some products (e.g. 747) to report to FAA but there're still a lot of inconsistency across programs. Please let us know if we can make specific requests.

Richard Minter: there is a meeting next week, I could raise there. I admit it was not on EASA list of priorities, but it would be for sure beneficial to harmonize.

Airbus: coming from US Operators (not from FAA), an input for the IMPS requesting routine reporting of corrosion findings. But still the IMPS is a recommendation: we would really have something done from EASA side to push the FAA.

Operator: Could CPCP be considered as part of ALS being part of compliance for 25.571?

Airbus: It's part of compliance but not a pure Airworthiness Limitation. To reference it in the ALS could be beneficial to reference it in the ALS. But it's not mandatory.

Aer Lingus: For non CPCP tagged tasks, is reporting still necessary?

Airbus: our target is the Primary Structure. For non-Primary structure maybe you should see if there could be an issue for adjacent structures.

AOB, Q&A

Presented by: All

None.

3.1 IMPLEMENTATION OF NEW MRB TASKS

Presented by: Ralf SCHNEIDER – EASA MRB Expert
Jürgen GRABENHORST – Cargolux

Jürgen Grabenhorst and Ralf Schneider provided feedback about current implementation policy of new tasks into MRBRs.

Q&A:

Airbus: quite a lot discussed topic. EASA committed to collect info from different EU manufacturers, but no feedback yet. Airbus has some guidelines in the MPD felt to be comprehensive. Discussed at the IMRBPB for harmonization, but it seems that trying to harmonize at international level may generate even more issues. It would be beneficial to come out at least with an EU position. Usually in EU if a new ALS comes it is accompanied by an AD.

KLM City: not always.

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Jürgen Grabenhorst: new CMR for Boeing means new ICA. The operator has to comply with the new CMR. To wait for an AD to be issued is not realistic.

Airbus: the communication from Airbus is quite detailed on that respect. Anyway is a warning for the operators, giving extra-time waiting for the AD coming along generally within 3 months. In the FAA world it is different (it happened even 3 YRs prior the AD to be distributed).

Jürgen Grabenhorst: in EU there is no policy stating it is not mandatory until the AD is issued. It is unclear how to implement these mods. Lowering intervals of CMR is a similar issue that does not happen very often, but it happens.

Aerlingus: Airbus does well on that respect.

KLM City: Fokker & Embraer provide a good implementation plan. In some cases a CMR is issued by OEM w/o AMM procedure and tooling. This should never happen because there is no way to comply with the CMR. Some NAAs simply have a "you have to do it" position in front of a CMR.

Jürgen Grabenhorst: NAAs have this position also on MRBR tasks, not only on CMRs. It is a sensitive issue. To provide an implementation plan could be an added value. Fan blade lubrication when you have vibration (having a vibration monitoring system in place) is an example provided during an ISC, but this approach has been rejected.

Airbus: some MRBRs have guidance. Is the EASA view changed?

Ralf Schneider: if it is clear that it is not a requirement but simply a guidance, why not?

Airbus: are this section of the MRBRs approved by EASA?

Ralf Schneider: yes they are

Airbus: so if we put Airbus guidances (currently in the MPD) in the MRBR, this may help.

Aer Lingus: if EASA agrees, how can be possible that local NAA doesn't?

Ralf Schneider: State of Registry has the final responsibility for the approval of implementation.

Aer Lingus: to standardize maybe at MPIG level with an agreed statement?

Airbus: we already tried but failed. We could try again.

Ralf Schneider: at least to try to harmonize the EU position could be a good idea.

Action Item #1: MPIG to propose a standard statement related to new MRBR tasks implementation for inclusion in the MRBR.

Mark Kieft: Certification considers ALSs & CMRs as mandatory and in some cases ADs are issued to cover revisions to these requirements although it seems the AD policy is not consistently applied. There is a time window between the publication of a CMR and the issue of an AD. Anyway later on the EASA Senior Expert for ICAs will be participating in the workshop, let's ask directly to him.

3.2 HYDROSTATIC TESTING / RE-QUALIFICATION OF PRESSURE CYLINDERS

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Presented by: Ronald Hamburg - KLM

Ronald Hamburg provided feedback about Hydrostatic Testing of Pressure Cylinders.

Q&A:

Mark Kieft: the IMRBPB agreed last April that no National Requirements should be included in the MRBR. National Requirements will be slowly removed from the MRBR.

Cargolux: FAA feels responsible for these parts on airplane. We transfer the task to the period where they can be removed from A/C

Aer Lingus: NAA will expect to follow the VEN REC. Our SIL has 10YRs Hyd Test for all bottles.

Ralf Schneider: every 2nd weight check you should perform an Hyd Test, so even more complicated.

Lufthansa: we decided to remove this requirement for any program wherever possible. If it comes from an MRB Report based on a CMM LHT it keeps it (just because it is not clear what an ICA is and what is not).

NOTE: Airbus showed a draft presentation related to Oxygen Cylinders (not to be distributed).

Tony Harbottle went through the ppt.

There are 4 potential sources:

- CMMs
- National Requirements
- Manufacturer Requirements
- MSG-3 analysis

Let's focus on Manufacturer's recommendations currently in place and reported in the MRBR. Are they coming really from MSG-3? Investigation is still in progress, so this presentation should not be considered as the official Airbus position. In accordance with Airbus logic to produce MSG-3 analysis, the Oxygen Cylinders analysis always drives to a FEC5 and a mandatory MRBR task has to be selected. Airbus is open to accept FEC8 based somehow on redundancy.

Ralf Schneider: why FEC8?

KLM City: it is not evident for portable cylinders

Ralf Schneider: there is no evidence of any bottle that failed the Hyd Test. E.g. Qantas bottle that failed 3 months after the Hyd Test has been performed.

Airbus: this means the Hydr Test could be considered as an applicable but not effective task

Ralf Schneider: this is our thought

Frederic Gasztowtt: if the issue is related to the effectivity of the Hydr Test, a different task could be selected in case of safety route

KLM City: back to OEM to review each MRBR task related to Hyd test. Did they enter the same analysis to come to those conclusions? Fokker ISC goes through a FEC8.

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Cecile Ben Mami: FEC5 in Airbus, why?

Airbus: sudden release of oxygen, maybe with chafing. Wondering how Boeing did not analyse it.

KLM City: in Boeing there is no task in the MRBR because there is a DOT per National Requirement.

Ralf Schneider: EASA fully disagree with that approach, and this has been made very evident at any level.

Antonino Levantino: let's continue discussion in the AOB session.

3.3 MDM.056 (RMT.0252) - INSTRUCTIONS FOR CONTINUING AIRWORTHINESS (ICA) - STATUS

Presented by: Markus JANISCHOWSKY - Senior Expert Instructions for Continued Airworthiness & PCM

Markus Janischowsky provided feedback on MDM.056 activity.

NOTE: Preliminary information provided. Not to be considered an official EASA position yet.

Q&A:

Cargolux: linked to the CMR presentation in the morning. There are new CMRs post-TC published and not introduced via AD. Help in clarification what to do in such a case.

Markus Janischowsky: CMR means ALS that means AD. Question: are we talking about EU programs? In EU there are no issues on ADs because covered by Part-M. As part of the review of Maintenance Program, CMRs should be implemented. Usually AD to operators are issued by EASA for non-EU operators because Part-M is not applicable.

Cargolux: that is mainly the problem. Any guideline?

Markus Janischowsky: OEM get in contact with the operators to provide guidelines, based on specific operators' reliability data. The info should be published anyway early enough.

Cargolux: AD always provide implementation intro. Not publishing it and basing the implementation via an AMOC seems not a consistent approach. EASA doc may be issued one month later and the operators can realize what happened too late.

Markus Janischowsky: a late input from DOA that something has to be made it's an issue for sure. Problems can happen from time-to-time. I would suggest in this case to contact the EASA PCM and to complain about the TCHs process.

KLM City: if the NAA does not provide an AMOC, Ops are in AOG. There is not always a "maintenance opportunity" to implement retroactive CMRs/ALIs.

Markus Janischowsky: this is not the EASA role

Cargolux: you are rulemaking, I am expecting you can do something

Markus Janischowsky: we have to distinguish:

- Urgent need to address at operators' level – EASA has no control on DOA delay

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- DOA is “always” late is another topic. EASA can help in interfacing with the non-compliant entity. In this case EASA is asking for very detailed info.

Airbus: if a CMR is issued to prevent to issue an AD, it shows this was not the original idea. This could partially explain why this is happening. The original idea of a CMR was not to cover in-service issues but certification requirements before the EIS of the initial Type.

Markus Janischowsky: I just invite the attendees to come with any specific example/issue that could be discussed on a case-by-case basis.

Aer Lingus: could you clarify the definitions of ICAs with reference to CMMs?

Markus Janischowsky: CMM may not constitute the minimum info. E.g. the “Overhaul” will not be just covered by a CMM. CMMs will be just the starting point to create the set of ICAs. EASA would like to see proper control on the CMMs but the FAA and TCCA have a different position.

Airbus: in Sub1 composition there are not suppliers representatives. Same components installed on a different a/c will have “customized” CMMs if they are going to be considered ICAs. We should try to harmonize the CMM verbiages to meet the MSG-3.

Markus Janischowsky: anyway there are cases where TCH is not controlling the suppliers’ CMMs. Referring to a CMM means that the TCH is endorsing that as an ICA. Some TCHs could decide not to refer to CMM procedures and produce their own instructions. TCH, responsible for the product, has both options.

Airbus: as result of the EASA position there will be another ICAs doc for the operators to be taken into account.

Markus Janischowsky: EASA is trying to put a bit of clarity on what an ICA is and what is not for the benefit of the operators.

AOB, Q&A

Presented by: All

Some attendees: can we have the Airbus presentation related to Hyd Test of Oxygen Cylinders?

Airbus: it is a draft version. We need to investigate more on this topic. Airbus presentation of Hyd Test related to Oxygen Cylinders will be distributed to EASA only for the time being.

FEEDBACK & PROPOSALS FOR THE NEXT EASA MRB WORKSHOP

Presented by: All

KLM City: this was a very constructive workshop. Industry caucus was appreciated. Some items should have been discussed during MPIG meetings. EASA should find a common position on some topics. There should be a Chair for the workshop to be on track. For On the Job Trainings we suggest to push the operators.

Luca Tosini: the participation of EU Operators during the US WGs /ISCs is good but not the reliability data provided in order to optimize the MRBR via IP44. We need more EU Operators input in the optimization process.

Airbus: this is done on voluntary basis because it is very difficult and expensive. There is no requirement for this. In addition some operators prefer to use their reliability data in order to optimize their own maintenance

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program not allowing the competitors to take advantages of this optimization. Not nice to see any data from EU doing the optimization of program during the WG/ISC in USA.

Aer Lingus: we prefer to manage the maintenance program optimization at local level an on a task by task basis. What we would need is something equivalent to the IP44 that could be used by the operators in front of the local NAAs.

Airbus Hel: this is also valid for the helicopters world. We need more reliability data.

KLM City: I would suggest to provide reliability data to the TCHs because it is very beneficial.

2016 EASA MRB WORKSHOP CLOSURE

Presented by: Mark KIEFT - EASA MRB Section Manager

Mark Kieft thanked everyone for attending. It was a successfull workshop not only related to MRB topics. The MRB process is evolving. This is an open workshop. We need industry inputs to improve the meeting.

The workshop closed at 12:30 on 10/Mar/2016.

List of actions:

Item	Action	Responsible	Deadline	Status
1_2016	MPIG to propose a standard statement related to new MRBR tasks implementation for inclusion in the MRBR.	MPIG	End of 2016	Open

Next meeting:

The next EASA MRB Workshop hasn't been planned yet.

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APPENDIX - Industry pre-Workshop meeting (NOT PART OF THE WORKSHOP)

Industry welcomed the opportunity to meet together prior to the start of the Workshop. Operators were very appreciative of the EASA initiative to invite them to participate in the Workshop.

Tony Harbottle from Airbus chaired the session and led the participants through the Workshop agenda providing additional background to items where necessary. Several items generated good discussion and highlighted points that Industry subsequently raised during the following two days. It became evident that, as might be expected, many of the operator's concerns were related to the handling and implementation of maintenance tasks in general and not specific to those generated through the MRB process.

Industry does not intend to create a dedicated Maintenance Program forum to provide consolidated positions to EASA. European manufactures meet regularly within MPIG and engage with the IMRBPB (including EASA) as necessary. It is recognised that few European operators have joined MPIG and thus during this session, as well as in a dedicated Workshop agenda item, participating operators were encouraged to review their interest in applying for membership. This approach was considered more efficient than generating another Industry grouping within Europe involving the same TCH members. As a result, the Industry pre-Workshop meeting will be an unofficial grouping of interested parties with no formal chair/secretary and no published minutes of meeting.

A selection of specific issues raised is provided below:

One operator expressed concern with the potential change to handling of the MRB Process either under BASAs or where the TCH takes some responsibility under their DOA. While this would seem to be realistic in Europe, it was suggested that if the same concept was accepted in Brazil then the output from the local TCH might not be favourable to customers due to the heavily regulated / military environment whose effect is, today, limited only by the presence of 'foreign' NAAs. The input of EASA MRB members is considered highly useful to ensure that the generated MRB Reports provide a minimum set of requirements. If their absence leads to heavier programs this may lead to protracted engagements with local NAAs on the need to reflect new / revised MRB tasks.

Following review of MPIG CIP-IND-2016-02, an operator commented that it is long overdue that operators are recommended to provide MSG-3 training to those responsible for maintenance program management. However, he believed it is even more important that similar training is provided to the local NAA responsible for overseeing those programs. This view was endorsed by all operators present, several of whom quoted examples of NAAs not being aware of the expectations from EASA regarding the control and implementation of new requirements issued by TCHs. Lack of knowledge (or understanding) of EASA's policies regarding maintenance task development can cause NAA's to adopt restrictive practices that severely limit an operator's capability to optimise their programs according to local conditions. There was a strong request for EASA to engage with the European NAA's to address these conservative approaches since this is preventing the establishment of the intended level playing field with Europe.

One operator tabled a concern with lack of implementation information for new ALS requirements. The question involved a US model and focussed on lack of availability of accomplishment data at time of ALS update possibly due to the fact that in the US the ALS is not required to be adopted on in-service aircraft until an AD is issued. This issue was outside the scope of the meeting but highlighted the need for European operators to have a forum to engage with EASA on maintenance program compliance issues.

From an administrative point of view, some participants requested that EASA establish some form of iShare to permit advance info to be distributed to invitees rather than passing a loaded USB key round the room. While that initiative is appreciated by some it is requested that EASA acknowledge that some companies forbid their employees to insert keys into their company laptops due to risk of viruses.