European Union Aviation Safety Agency

FAQ n.116316

FAQs:

COVID-19 - Continuing Airworthiness, Continuing Airworthiness, Regulations

Question:

Under the present rules, is the person responsible for the continuing airworthiness of an aircraft (owner, CAO or CAMO) allowed to split the customised maintenance checks?

Answer:

1. Purpose of the document

The Agency was requested by the industry for additional guidance on the application of the airworthiness rules in respect to certain specific issues particularly affected by the current COVID-19 crisis. One of those topics concerns the possibility for a person responsible for continuing airworthiness of aircraft to split the customised maintenance tasks. Accordingly, the Agency prepared this additional, temporary, guidance document, which complements the existing GM/AMC to Commission Regulation (EU) No 1321/2014.

2. Description of the issue

Considering the large number of aircraft grounded at the same time during the COVID-19 crisis, the movement restrictions of persons, the temporary lack of access to certain facilities and/or services, the competent authorities may need to facilitate a more practical scheduling process of the Aircraft Maintenance Programme (AMP) tasks and a simpler process of approving changes to the responsible organisation’s procedures, in order to ensure as much as possible the continuation of organisation activities during this period, in compliance with the applicable requirements.

For aircraft managed under Annex I (Part-M) to Commission Regulation (EU) No 1321/2014, in accordance with M.A.301(c), the owner, CAO or CAMO, as applicable, should have a system to ensure that all aircraft maintenance tasks are performed within the limits prescribed by the approved Aircraft Maintenance Programme (AMP) and that, whenever a maintenance task cannot be performed within the required time limit, its postponement is allowed in accordance with a procedure agreed by the competent authority (CA).

If an owner, CAO or CAMO, as applicable, has developed the AMP through grouping of individual maintenance tasks into packages based on usage parameter(s) (e.g.: annual inspection, 1,000 FH inspection) or letter-checks (e.g.: A-check, C1-check), as per points

M.A.302(a)&(f) any split of such a package back to individual maintenance tasks requires an amendment to the AMP and is subject to direct approval by the CA as per point M.A.302(b), unless this is already covered by the indirect approval of the AMP as per point M.A.302(c).

Under the COVID-19 circumstances, splitting the maintenance packages may give to the aircraft owner, CAO or CAMO, as applicable, the possibility to tailor and schedule the individual maintenance tasks as they are strictly needed, fitting the aircraft operational needs and activities, as well as the availability of the required facilities and/or services. It must be ensured that the AMP task intervals are respected.

For aircraft managed under Annex Vb (Part-ML) to Commission Regulation (EU) No 1321/2014, the aircraft owner, CAO or CAMO, as applicable, may simply declare/approve an amendment to the AMP in accordance with ML.A.302(b). When doing so, the same principles as the ones mentioned above for aircraft managed under Part M may be implemented, within the limits of the applicable rules.

EASA welcomes the efforts of the owners, CAOs and CAMOs, as applicable, for amending the AMPs and the CAs for having the amendments approved as quickly as possible, based on the principles mentioned above, within the limits of the applicable rules.

EASA is available to provide more technical support on this process on a case by case basis, upon the CAs' request.

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Link:

https://www.easa.europa.eu/en/faq/116316