European Union Aviation Safety Agency

Continuing Airworthiness

In case the answer you were looking for in this FAQ section is not available, you are invited to contact first your competent authority (here for EASA member states). For further assistance, you might submit your enquiry, together with the description of your authority's position, here.

Easy Access Rules for Continuing Airworthiness (Regulation (EU) No 1321/2014), covering covering Part-M, Part-145, Part-66, Part-147 and Part-T.

COVID-19 - Continuing Airworthiness

What is the flexibility allowed to the person or organisation responsible for the aircraft continuing airworthiness when it comes to the planning of Aircraft Maintenance Programme (AMP) scheduled maintenance tasks with intervals expressed in calendar time?

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 obligations of the person or organisation responsible for continuing airworthiness of aircraft when it comes to the accomplishment of Aircraft Maintenance Programme tasks with intervals expressed in calendar times. Accordingly, the Agency prepared this additional, temporary, guidance, which complements the existing AMC/GM to Commission Regulation (EU) No 1321/2014.

The guidance provided in this document is primarily intended for 'Part-M' aircraft, but can be used also as regards 'Part-ML' aircraft, except that in case of 'Part-ML' aircraft, the competent authority does not need to be involved if an AMP task is to be postponed, as this is done under the responsibility of the aircraft owner or the organisation responsible for the aircraft continuing airworthiness. This person or organisation may also decide, if necessary to revise the AMP, which will not involve the competent authority.

2. Description of the issue

During the COVID-19 crisis, a large number of aircraft is being parked / stored at different and partially remote locations. This guidance document was prepared based on an assumption that these aircraft have been subject to parking/storage procedures defined by the Type Certificate (TC) Holder (those parking and storage procedures are usually contained in a chapter of the Aircraft Maintenance Manual (AMM e.g. Chapter 10). If the existing AMM does not contain parking/storage procedures, the TC Holder should be contacted.

Note: It is not necessary to revise the AMP to include the parking/storage tasks to be followed.

During the COVID-19 crisis, the parked/stored aircraft are not operated and consequently the AMP scheduled maintenance tasks based on 'Flight hours' and 'Flight cycles' are not impacted. On the other hand the AMP scheduled maintenance tasks based on intervals (and threshold, if applicable) expressed in calendar times need to be considered. Indeed, some of the calendar time based scheduled maintenance tasks will become due during parking/storage period.

In the normal practice, following the principles of AMC M.A.301(c) and point 4 of Appendix I to AMC M.A.302 and AMC M.B.301(b), if a scheduled maintenance task cannot be performed within the interval approved in the AMP, its postponement may be allowed in accordance with pre-defined 'permitted variation' agreed with the CA in the AMP.

3. Considerations in the frame of COVID-19 crisis

3.1 Postponement until the end of parking/storage period
In the current situation, it may not be always feasible, to perform the calendar scheduled maintenance tasks of the AMP in due time, or within the permitted variation specified in the AMP.
In such cases, it is acceptable for EASA to plan the accomplishment of these tasks (even if they have become due multiple times

during the parking/storage period) at the next suitable opportunity (e.g. next weekly check of storage/parking procedure), or at the end of the storage/parking period, but in any case before the next flight, as part of the work package necessary for the de-preserving/de-storage of the aircraft.

Note: Certain AMP scheduled maintenance tasks may be assessed as unnecessary because they are covered by equivalent tasks in the parking/storage procedures put in place.

3.2 Postponement beyond return to service

If exceptionally, a calendar task needs to be postponed until after the return to service and beyond the AMP permitted variation, the aircraft owner or CAMO/CAO should receive advice from the TCH or the Design Approval holder (DAH) on such postponement and on the subsequent due date after the accomplishment.

The applicant should then submit such postponement, together with the proposed technical justification, including if appropriate, a risk assessment, for approval by the CA.

The CA should consider the following conditions, mitigating actions or any other elements which the CA deems necessary, when allowing a postponement of a due calendar task after return to service:

- An approved maintenance organisation has applied the appropriate parking/storage procedures during the full period.
- The owner/CAMO/CAO has monitored what AMP tasks are due (M.A.708(b)(4), CAMO.A.315(b)(5) and CAO.A.075(b)(7)).
- This does not apply to mandatory continuing airworthiness instructions (MCAI) such as AD or ALS tasks.
- The environmental conditions where the aircraft was parked/stored have been taken into consideration. Certain calendar tasks may be more relevant to a particular storage environment, e.g. wet, salty conditions propagate corrosion.

In addition, the importance of the AMP task (e.g. based on MRB task type/source/category, reliability-alert task), the performance of the CAMO/CAO quality system, and if applicable the review of the risk assessment performed by the applicant, should also be considered.

Based on the above elements, it may be possible to allow an exceptional (one-off) postponement, not exceeding the following:

(i) AMP task interval of 1 year or less: up to 3 months

(ii) AMP task interval of more than 1 year, but not exceeding 2 years: up to 4 months

(iii) AMP task interval of more than 2 year, but not exceeding 3 years: up to 5 months

(iv) AMP task interval of more than 3 years: up to 6 months.

Such postponement should be calculated from the original AMP task due date, unless otherwise agreed with the competent authority.

The subsequent due date should also be part of the CA approval.

The Aircraft continuing airworthiness record system, and if applicable, the aircraft technical log system should properly record such agreement and the effective accomplishment date.

Depending on the length of the COVID-19 crisis and the future annual utilisation of the aircraft, the CA may also require to the owner/CAMO/CAO an ad-hoc review of the AMP pursuant to M.A.302(h).

Last updated:

01/07/2020

Link:

https://www.easa.europa.eu/en/faq/116314

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.

Last updated:

01/07/2020

Link:

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

Under the present rules, how can a maintenance organisation extend the use of the privileges specified in 145.A.75(c) of line maintenance performed away from an approved location?

Answer

1. Purpose of the document

Considering the impact of the COVID-19 crisis on the aviation sector – a large number of aircraft grounded at airports/ locations where there is no maintenance organisation which can perform the required maintenance/ preservation tasks, to name but a few – the Agency was requested to provide to competent authorities (CAs) with additional guidance material to facilitate a simpler process of approving changes to the applicable organisation's procedures. This document is therefore intended to guide CAs in keeping continuing compliance with the applicable requirements and ensure, as much as possible, the continuation of maintenance organisation activities.

The guidance provided in this document is primarily intended for Part-145 organisations, but can be used also in case of Part-M, Subpart F and Part-CAO organisations, if needed.

2. Description of the issue

In accordance with 145.B.35 and 145.B.40 of Regulation (EU) 1321/2014, the CA may consider to approve a concession to allow deviating from the Maintenance Organisation Exposition (MOE) procedures for maintenance performed away from an approved location, as per 145.A.75(c) and permit the performance of line maintenance in a non-approved location for a period up to 3 months (90 days).

The maintenance organisation may be allowed to perform line maintenance at such a location without having the obligation to get the approval of a line station in accordance with 145.A.85 i.e. without the need to declare the location in the MOE as required by 145.A.75(d).

The concession will be controlled by the maintenance organisation in accordance with MOE Ch. 3.10.

3. Considerations for the competent authority (CA)

When deciding on approving such a concession (requested by the maintenance organisation), the CA should take into consideration its duration period and the conditions for applying the respective change of procedure, based on at least the following aspects:

- previous performance of the organisation; and
- confidence of the competent authority in the ability of the internal quality system of the organisation to ensure safe operations.

After the initial period of the approved concession, the competent authority may reassess, following the same process as described above, the situation and may approve an additional extension of the initial period with another maximum 3 months (90 days) together with specifying the related conditions, as necessary.

Last updated:
01/07/2020

Link:
https://www.easa.europa.eu/en/faq/116317

Under the present rules, how can a production or maintenance organisation continue to use tools or equipment even if their calibration/periodical check cannot be carried out before the due date?

Answer

1. Purpose of the document

Considering the restrictions of movement of people or the temporary lack of access to certain facilities and/or services due to the COVID-19 crisis, which may have as a result that production and maintenance organisations are not able to get calibration/periodical checks of their tools and equipment carried out before the due date, the Agency was requested to provide additional guidance to the competent authorities to facilitate a simpler process of approving changes to the applicable organisation’s procedures, and to ensure as much as possible the continuation of production and maintenance organisation activities during this period, in compliance with the applicable requirements.

2. Description of the issue

In accordance with:

- For Part 21, Subpart F: points 21.A.125A and 21.A.126(a)(3)/GM No 2 to 21.A.126(a)(3);
- For Part 21, Subpart G: points 21.A.139(b)1.(vii), 21.A.143(a)(11) and 21.A.145(a)/GM 21.A.145(a); and
- For Part-M, Subpart F; Part-CAO and Part-145: as applicable, points M.A.604(a)7, M.A.608(b), CAO.A.050(b), CAO.A.025(a)(10), 145.A.40(b), 145.A.70(a)12., M.A.402(d) and ML.402(b)(4),

the production or maintenance organisation shall ensure, by complying with adequate procedures included in its exposition or manual, that all tools and equipment, as appropriate, are controlled and calibrated/periodically checked according to an officially recognised standard at a frequency to ensure serviceability and accuracy.

When such a procedure includes a recurrent calibration/periodical check of tools or equipment, it is possible that, due to the COVID-19 crisis, the procedure cannot be complied with because a recurring calibration/periodical check cannot be carried out before the specified due date. In such a case, a temporary change (direct or indirect approved or concessions) to the procedure may be acceptable in order to allow continuation of the activities in compliance with the rules.

In accordance with:

- For Part 21, Subpart F: points 21.A.125A and 21.B.140;
- For Part 21, Subpart G: points 21.A.143, 21.A.147 and 21.B.240;
- For Part-M, Subpart F: points M.A.604, M.A.617 and M.B.606;
- For Part-CAO: points CAO.A.025, CAO.A.105 and CAO.B.065; and
- For Part-145: points 145.A70, 145.A.85 and 145.B.35,

the competent authority may approve a temporary change to the applicable organisation's procedure to allow an extension of the period at the end of which the calibration/periodical check of the tool or equipment is due.

3. Considerations for the competent authority (CA) and the organisations

The decision of the competent authority on the approval of such a temporary change should be taken based on a risk analysis performed by the organisation. The risk analysis shall consider the previous performance and reliability of the tool or equipment, previous calibration and periodical checks results and possible additional mitigating measures (like using tools from other organisations for critical applications).

Few considerations for the risk analysis may be, but are not limited to the following:

- when the normal calibration/check period is ≤ 12 months the extension of the calibration and/or periodical check can be up to a maximum of 10 % of the normal calibration/check;
- when the calibration/check period is > 12 months the extension of the calibration can be 10 % of the normal calibration/check period up to a maximum of 3 months;
- the risk associated to the use of the tool or equipment for the specific task in relation to ensuring conformity with the approved data or continuing airworthiness of the aircraft or components is not determined critical;
- the tool or equipment is inspected before use and no damage or corrosion is identified;
- the tool or equipment was recently used (e.g. within the 3 months preceding the calibration or periodical check due date);
- no deficiency with the use of this tool or equipment has been reported since the last calibration or periodical check;
- the last two calibration results or last periodical checks are not showing any possible issues (e.g.: drift in the value, value very close to the acceptable limit, etc.) that can endanger the result of the activity performed.

If the risk associated to the use of the tool or equipment for the specific task is identified as critical, the organisation shall receive the tool or equipment manufacturer extension acceptance, and shall take additional measures to verify and ensure the correct production / maintenance results, such as:
verification of the tool or equipment serviceability by comparison with another tool/equipment duly calibrated/periodically checked, and/or
verification of the measurement/test/job-result by other acceptable means.

The tools or equipment with extended calibration or maintenance interval, should be recorded in a dedicated form, allowing tracking the tasks performed. If the tool / equipment fails during next regular calibration / inspection, the completed tasks may require to be verified / performed again.

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01/07/2020

Link:
https://www.easa.europa.eu/en/faq/116318

Under the present rules, can a maintenance organisation continue to keep a supplier on the approved list even if full compliance with its evaluation of suppliers' procedure cannot be ensured?

Answer

1. Purpose of the document

Considering the impact of the COVID-19 crisis on the aviation sector - the reduced personnel in the maintenance organisations, or late feedback/reply from their suppliers which may affect compliance with their suppliers' evaluation procedures - the Agency was requested to provide to competent authorities (CA´s) with additional guidance material to facilitate a simpler process of approving changes to the applicable organisation's procedures, in order to ensure as much as possible the continuation of maintenance organisation activities in compliance with the applicable requirements.
This document is therefore intended to guide CA´s in keeping continuing compliance with the applicable requirements and ensure, as much as possible, the continuation of maintenance organisation activities.

2. Description of the issue

In accordance with 145.A.70(a)(12), 145.A.42(b)(i), M.A.604(a)(7), CAO.A.025(a)(10), M.A.501(b) and ML.A.501(a)(i) of Regulation (EU) 1321/2014, as applicable, the approved organisation carrying out maintenance on products or components have to ensure, by complying with adequate procedures included in the exposition or manual (MOE chapter 2.1, MOM chapter 2.8 or CAE chapter C.3), that the necessary components, standard parts and/or material are supplied in satisfactory conditions. When such a procedure includes a recurrent evaluation of a supplier's quality system based on a questionnaire which is periodically sent by the maintenance organisation to the supplier, it is possible that, due to the COVID-19 crisis, the procedure cannot be complied with. In such a case, a temporary change to the procedure (including concessions), in accordance with 145.A.70(b), M.A.604(b) and CAO.A.105(a) 5, as applicable, may be acceptable in order to allow continuation of the activities in compliance with the rules.

3. Considerations for the competent authority (CA)

In accordance with 145.B.35, 145.B.40, M.B.606(c) or CAO.B.065 of said Regulation, the competent authority may approve (direct or indirect) a temporary change to the applicable organisation's procedure to allow an extension of the period for evaluation of the suppliers' performance (when based on a questionnaire sent to supplier) up to 3 months in order to maintain the respective suppliers on the approved list of suppliers, based on a risk assessment which considers at least the following elements:

- confidence in the quality system / organisational review of the maintenance organisation; and
- analysis performed by the maintenance organisation to support the extension, taking into account the criticality of the supplied articles, the results of the previous evaluation of the respective supplier and the supplier's performance.

After the agreed extension period the situation may be reassessed and an additional extension of the initial period up to a maximum of 3 additional months may be envisaged by the CA, following the same process as the one described above (change of the organisation's applicable procedure).

Last updated:
01/07/2020

Link:
https://www.easa.europa.eu/en/faq/116319

Is there any possibility to temporary extend the validity of NDT personnel certification due to coronavirus (COVID-19) crisis?

Answer

According to the industry standard EN4179, recognised by the EASA via AMC 145.A.30(f) and AMC M.A.606(f) to be used for qualification of NDT personnel, the NDT personnel Level 1, 2 and 3 shall be recertified every 5 years. No flexibility is given by EN4179 to deviate from the specific requirements of EN4179, Chapter 8 related to the recertification of NDT personnel process.

Due to the extraordinary worldwide coronavirus crisis, the recertification requirements might not be fulfilled (examinations). Other impacted processes can be "annual maintenance" and "vision examination" which invalidate the certification if not performed on time.

In these circumstances, the Agency recommends the organisation to agree with the Competent Authority a deviation from the

organisation's procedure (e.g. in case of Part-145 to use the normal concession process - deviation from an approved exposition (MOE) for a limited period of time) in case of a need to temporary extend (without fulfilling the normal requirements) the validity of NDT personnel certification, annual maintenance and/or vision examination. The organisation should contact their Competent Authority surveyor and agree on mitigating measures depending on the extent of the concession needed (e.g. EN4179 para. 8.3.2, second and fourth bullet points could offer grounds for mitigation measures).

For standardisation reasons, it is recommended that each National Aerospace NDT Board (NANDTB) together with the corresponding Competent Authority establishes the general scenario to be followed by the organisations (e.g. by an information notice on the NANDTB website or by e-mail etc.). This will be further adapted to the specific case (e.g. in the case of a Part-145 organisation with D1 rating additional mitigation measure could be taken for the NDT personnel who is also certifying staff).

Same principles can be applied by Part-21 Subpart G and F organisations having the NDT personnel qualified/certified i.a.w. EN 4179 when applying the GM 21.A.145(a) or GM No 2 to 21.A.126(a)(3).

Last updated:
16/04/2020

Link:
https://www.easa.europa.eu/en/faq/112804

Interpretation and policy papers

What is the EASA policy on Certificates of Release to Service for aircraft maintenance? With respect to such maintenance, what are the responsibilities of maintenance organisations and CAMO?

Answer

EASA issued on December 17, 2015 a paper to answer these questions; please see the link here:"EASA policy on Certificates of Release to Service for aircraft maintenance and associated responsibilities of maintenance organisations and CAMOs".
Since that time, several regulations, including the ones below were adopted, amending Commission Regulation (EU) No 1321/2014.:

1. Regulation (EU) 2018/1142, introducing certain categories of aircraft maintenance licences;
2. Regulation (EU) 2019/1383, introducing new Annexes to Commission Regulation (EU) No 1321/2014:

- Part-CAMO;
- Part-CAO for non-complex aircraft
- Part-ML for light aircraft defined in Article 3(2).

The intent of that paper is still valid in describing the principles of EASA's position on the following questions:

- Continuing airworthiness responsibilities, including maintenance (chapter 1)
- How many CRS can or should be issued (chapter 3)
- What does it mean that "there are no non-compliances which are known to endanger flight safety" (chapter 4)

However, questions on roles and responsibilities of certifying staff and support staff (chapters 5, 6, 7 and 8) are now addressed in an updated paper dated March 2023 that is available in FAQ n° 137750.

Last updated:
23/03/2023

Link:
https://www.easa.europa.eu/en/faq/46216

What practice is accepted by EASA to release maintenance on aircraft not covered by the Basic Regulation?

Answer

EASA issued on 20 March 2013 a paper to answer this question (please see link here):
'Rulemaking interpretation on "Maintenance release of aircraft not covered by the Basic Regulation"'.
Since that time:

- the Basic Regulation (Regulation (EU) 2018/1139 was issued, repealing the previous Basic Regulation (Regulation (EC) No 216/2008); and
- Commission Regulation (EU) No 1321/2014 was issued, repealing Commission Regulation (EC) No 2042/2003.

However, the intent of that paper is still valid in describing the various practices and EASA's position on the release of maintenance on aircraft that are aircraft excluded from complying with the airworthiness requirements contained in the Basic Regulation, and in its delegated and implementing acts.

Last updated:
31/10/2019

Link:
https://www.easa.europa.eu/en/faq/46215

What is the view of EASA on the transition of existing continuing airworthiness organisations to the new Part-CAO and Part-CAMO organisations?

Answer

Regulation (EU) 2019/1383 amending Regulation (EU) No 1321/2014 introduces new types of organisations (Part-CAO and Part-CAMO) in the Continuing Airworthiness domain, as of 24 March 2020.

This guide offers the view of EASA on the transition of existing continuing airworthiness organisations to the new Part-CAO and Part-CAMO organisations, based on Article 4 of Regulation (EU) No 1321/2014 as amended. This is not binding material.

Last updated:
03/11/2021

Link:
https://www.easa.europa.eu/en/faq/108380

Regulation (EU) 2021/1963 introduces SMS requirements to Part-145. What is the view of EASA on the transition of these maintenance organisation to the new requirements?

Answer

Regulation (EU) 2021/1963 amends Regulation (EU) No 1321/2014 and introduces new requirements for Part-145 approved maintenance organisations, which apply from 02 December 2022.

This guide offers the view of EASA on the transition of a Part-145 approved maintenance organisation to the new requirements, including SMS, based on Article 4(7) of Regulation (EU) No 1321/2014, as amended by Regulation (EU) 2021/1963.

This is not binding material.

Last updated:
04/07/2022

Link:
https://www.easa.europa.eu/en/faq/136745

What are the roles and responsibilities of personnel involved in aircraft line and base maintenance?

Answer

EASA issued on March 2023 a paper to answer this question: "EASA Policy on the roles and responsibilities of personnel

involved in aircraft line and base maintenance".

This paper supersedes the chapters 5, 6, 7 and 8 of the paper issued December 2015 that can be found in FAQ No. 46216.

Please refer also to the Roles and responsibilities of Maintenance personnel webinar that was organised to explain the content of this paper

Last updated:
23/03/2023

Link:
https://www.easa.europa.eu/en/faq/137750

What is the view of EASA on 'paperless maintenance' and on the use of electronic documents, records, and signatures?

Answer

Both European industry and EU Member State competent authorities have requested EASA to prepare guidelines to cover the topic of 'paperless maintenance', aiming to establish some basic standards upon which stakeholders can create their systems under the assumption that these will be recognised as adequate and regulatory-compliant by the competent authorities, at least those participating in the EU-aviation system.

This guide offers the view of EASA on the use of electronic documents, records, and signatures. This is not binding material.

Last updated:
05/05/2023

Link:
https://www.easa.europa.eu/en/faq/137907

Continuing airworthiness - General

Concerning the approval of the continuing airworthiness organisations, what is the sharing of responsibilities between EASA and the national competent authorities of the EASA Member States? How to get the lists of the approved continuing airworthiness organisations?

Answer

In accordance with point 2(b) in Article 77 of the Basic Regulation (i.e. Regulation (EU) 2018/1139 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency), EASA is responsible for the organisations whose principal place of business is outside the territories for which the EASA Member States are responsible under the Chicago Convention.
For more information, see the website Continuing-airworthiness-organisations, where the lists of organisations managed by the Agency are available.

This webpage also includes the lists of the Part-145 maintenance organisations managed on the basis of the Bilateral Aviation Safety Agreements (BASAs) with Brazil, Canada and USA.

In all other cases, and in the absence of the implementation of Articles 64 or 65 of the Basic Regulation, the organisation is managed by the national competent authority of the EASA Member State in whose territory the principal place of business of the organisation is located.
Therefore, information request (including on the application process) about those organisations should be directed to the EASA Member State national competent authorities.
You may contact them using information available on https://www.easa.europa.eu/the-agency/member-states, or consult their public websites, when they accepted, on a voluntary basis, to publish the lists of the organisations they manage.

The continuing airworthiness organisations concerned are the following:

- Part-145 (Annex II) maintenance organisations
- Part-147 (Annex IV) maintenance training organisations
- Continuing airworthiness management organisations: Part-M Subpart G until **24 September 2021** and Part-CAMO (Annex Vc) from **24 March 2020**
- Part-M Subpart F maintenance organisations until **24 September 2021**
- **From 24 March 2020**, Part-CAO (Annex Vd) combined airworthiness organisations.

Last updated:
31/10/2019

Link:
https://www.easa.europa.eu/en/faq/19067

Where can I find the continuing airworthiness requirements for third-country registered aircraft used by EU operator/owner?

Answer

The European Implementing Rules for continuing airworthiness (EU) 1321/2014 **do apply** to third-country registered aircraft if:

- The regulatory safety oversight of such aircraft has been delegated to one of the Member States (*), in which case Part-M (Annex I) or Part-ML (Annex Vb) applies [see Article 3(1) of Regulation (EU) No 1321/2014] or
- The aircraft is dry leased-in by an EU licenced air carrier, in which case Part-T (Annex Va) is applicable [see Article 3(6) of Regulation (EU) No 1321/2014].

When third-country registered aircraft are not captured by above-mentioned cases, it is advised to go back to the foundation of the EASA system, namely the Basic Regulation (BR), i.e. Regulation (EU) 2018/1139.

Reference should be made to Annex V **(Essential requirements for air operations)** in accordance with Article 29 for the aircraft described in Article 2(1)(b)(ii) (aircraft registered in a third country and operated by an aircraft operator established, residing or with a principal place of business in the territory to which the Treaties apply). **Point 6 in Annex V** of the BR describes air operations requirements related to continuing airworthiness, such as the requirement for release to service, pre-flight inspection, maintenance programme, records, … Being part of an Annex relevant to air operations, these requirements have to be overseen by the competent authority of the state of the operator.

Furthermore, as required by point 8 of Annex V of the BR, **for commercial air transport and other operations subject to a certification or declaration requirement performed with aeroplanes, helicopters or tilt rotor aircraft**, the continuing airworthiness management and maintenance tasks shall be controlled by an organisation, whose obligations (such as establishment of a management system) are referred to in points 8.8 and 8.9 of Annex V.

(*) – The transfer of a state's oversight responsibility is addressed in Article 83bis bis of Chicago Convention.

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/47404

How to use information and communication technologies for performing remote audits on to DOA, LoA/POA, AMO, CAMO, CAO and AMTO holders*?

Answer

Objective of this document:
This document provides technical guidance on the use of remote information and communication technology (ICT) to support:

- the competent authorities when performing the oversight of regulated organisations and
- the industry when conducting internal audits / monitoring compliance of the organisation with the relevant requirement and

when performing evaluation of suppliers and subcontractors.

It is the responsibility of the competent authority to assess whether the use of remote ICT constitutes a suitable alternative to the physical presence of the auditor on-site in accordance with the applicable requirements.

In the context of this document, “remote audit” is understood as an audit performed with the use of any real-time video and audio communication tools in replacement of the physical presence of the auditor on-site. Specificities of each type of approval / letter of agreement need to be considered in addition to the below general overview when applying the “remote audit” concept.

1. Conduct of remote audit by a Competent Authority

Competent authorities who decide to use remote audit should describe the remote audit process in their documented procedures and should consider at least the following elements:

- Methodology for the use of ICT is sufficiently flexible and non-prescriptive in nature to optimise the conventional audit process.
- Adequate controls are defined and in place to avoid abuses that could compromise the integrity of the audit process.
- Measures to ensure that security and confidentiality are maintained throughout the audit activities (data protection and intellectual property of the organisations also need to be safeguarded).

Examples of use of ICT during audits may include but are not limited to:

- meetings, by means of teleconference facilities, including audio, video and data sharing;
- assessment of documents and records by means of remote access, in real-time;
- recording, in real-time during the process, of evidence to document the results of the audit (non-/conformities) by means of exchange of emails or documents, instant pictures, video or/and audio recordings;
- visual (livestream video) and audio access to facilities, stores, equipment, tools, processes, operations, etc.

An agreement between the competent authority and the organisation should be established when planning a remote audit which should include:

- determining the platform for hosting the audit (e.g. Go-To-Meeting, WebEx, Microsoft Lync, Microsoft TEAMS, etc.);
- granting security and/or profile access to the auditor;
- testing platform compatibility between the competent authority and organisation prior to the audit;
- considering the use of web-cams, cameras, drones, etc. when physical evaluation of an event (product, part, process, etc.) is desired or necessary;
- establishing an audit plan which will identify how ICT will be used and the extent of its use for the audit purposes to optimise its effectiveness and efficiency while maintaining the integrity of the audit process;
- if necessary, time zone acknowledgement and management to coordinate reasonable and mutually agreeable convening times;
- a written statement of the organisation that they ensure full cooperation and provision of the actual and valid data as requested, including ensuring any supplier or subcontractor cooperation, if needed; and
- data protection aspects.

The following elements of the equipment and setup should be considered:

- the suitability of video resolution, fidelity, and field of view for the verification being conducted;
- the need for multiple cameras, imaging systems, or microphones and whether the person performing the verification can switch between them, or direct them to be switched and has the possibility to stop the process, ask a question, move equipment, etc.;
- the controllability of viewing direction, zoom, and lighting;
- the appropriateness of audio fidelity for the evaluation being conducted; and
- real-time and uninterrupted communication between the person(s) participating to the remote audit from both locations.

When using ICT, the competent authority and other involved persons (e.g. drone pilots, technical experts) should have the competency and ability to understand and utilize the ICT tools employed to achieve the desired results of audit(s)/assessment(s). The competent authority should also be aware of the risks and opportunities of the ICT used and the impacts that they may have on the validity and objectivity of the information gathered.

Audit reports and related records should indicate the extent to which ICT has been used in carrying out remote audit and the effectiveness of ICT in achieving the audit objectives, including any item that was not able to be completely reviewed.

2. Internal Audits performed by approved organisation and evaluation of its suppliers and subcontractors

The considerations described in paragraph 1 may also be applied by approved organisations when conducting internal audits / monitoring compliance of the organisation with the relevant requirements and when performing evaluation of suppliers and

subcontractors. The application of “remote audit” concept should be described in a documented procedure accepted / approved by the Competent Authority.

** DOA: Design Organisation Approval; LoA/POA: Letters of Approval/Production Organisation Approval; AMO: Maintenance Organisation Approval; CAMO: Continuing Airworthiness Management Organisations Approval; CAO: Combined Airworthiness Organisation Approval; and AMTO: Maintenance Training Organisation Approval*

Last updated:

19/07/2020

Link:

https://www.easa.europa.eu/en/faq/116561

Can a Pilot-Owner or Flight Crew accomplish an inspection required by an AD?

Answer

The provisions for a Pilot-Owner or Flight Crew to accomplish AD actions are to be found inCommission Regulation (EU) No 1321/2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks, Annex I (Part-M), Annex II (Part-145), Annex Vb (Part-ML) & Annex Vd (Part-CAO).

For AD tasks carried out by Flight Crew:

- IF INDICATED IN THE AD (*- see Note), THE FOLLOWING APPLIES:
  145.A.30(j)3 or M.A.606(h)1 Personnel requirements, or CAO.A.040(c)(1) Certifying staff.

For a repetitive pre-flight task, where the AD specifically states that the flight crew may carry out such task, the organisation (Part-145, Part-M Subpart F or Part-CAO maintenance organisation) may issue a limited certifying staff authorisation to the pilot-in command/aircraft commander on the basis of the flight crew licence held, provided that the organisation ensures that sufficient practical training has been carried out to ensure that such person can accomplish the AD task to the required standard. A repetitive pre-flight task in an AD does not mean that the task needs to be certified prior to each flight. At AD issuance EASA will determine that the task is simple enough and does not require complex tools nor complex instructions, which allows the Maintenance Organisation to authorise the person.

- IF NOT INDICATED IN THE AD, THE FOLLOWING APPLIES:
  145.A.30(j)4 or M.A.606(h)2 Personnel requirements, or CAO.A040(c)(2) Certifying staff.

In the case of aircraft operating away from a supported location the organisation may issue a limited certification authorisation to the pilot-in command/aircraft commander on the basis of the flight crew licence held, provided that the organisation ensures that sufficient practical training has been carried out to ensure that such person can accomplish the specified AD task to the required standard. The organisation’s manual shall include specific procedures for such authorisations, and in addition the task must be simple maintenance.

For AD actions performed by Pilot-Owner for aircraft subject to Part-M:

M.A.803 Pilot-owner authorisation

- This is only applicable for other than complex motor-powered aircraft of 2 730 kg MTOM and below, which are not used commercially;
- The accomplishment of an AD task by the Pilot-Owner is permitted only in the case where it is specifically allowed in the AD (* - see Note); and
- Furthermore, it is only permitted to the Pilot-Owner under the conditions of M.A.803 (a) and (b) (limited Pilot-owner maintenance (Appendix VIII to Part-M)).

For AD actions performed by Pilot-Owner for aircraft subject to Part-ML:

ML.A.803 Pilot-owner authorisation

- This is only applicable to aircraft not operated commercially, to balloons not operated under Subpart-ADD of Regulation (EU) 2018/395 or to sailplanes not operated under Subpart DEC of Regulation (EU) 2018/1976;

- The accomplishment of an AD task by the Pilot-Owner is permitted only in the case where it is specifically allowed in the AD (* - see Note); and
- Furthermore, it is only permitted to the Pilot-Owner under the conditions of ML.A.803 (a) and (b) (limited Pilot-owner maintenance (Appendix II to Part-ML)).

* Note: For ADs issued by EASA, when the flight crew / pilot-owner is entitled to carry out the AD task(s) subject to the applicable requirements, the AD will contain a text similar to the following:

The action(s) required by paragraph (x) of this AD may be accomplished, as appropriate: either by suitably authorised flight crew under the provisions of Commission Regulation (EU) No 1321/2014 145.A.30(j)3, M.A.606(h)1, or CAO.A.040(c)(1), as applicable; or by the pilot-owner under the provisions of M.A.803 or ML.A.803, as applicable, of the same regulation.

In respect of aircraft not subject to (EU) No 1321/2014, the State of Registry should consider if the national regulations allow the action(s) to be accomplished by the flight crew or pilot owner.

Last updated:
09/07/2021

Link:
https://www.easa.europa.eu/en/faq/19491

Bilateral Agreement (BASA) - related to Continuing Airworthiness

When do I need a dual release on FAA Form 8130-3 under EU/US bilateral agreement?

Answer

Under the terms of the EU/US bilateral agreement (BASA) (see here), a DUAL release is required for acceptance of USED engine/components from an US based repair station.

NOTE: a single EASA release on Form 8130-3 with only “Other regulation specified in block 12” ticked in block 14a is also acceptable for USED engine/components. This is to cover the case where component maintenance includes the installation of a used (sub)component released on an EASA Form 1 with ‘single release’ only, and therefore where the assembly is not eligible for US-registered aircraft.

CAUTION: DUAL release is not acceptable for ‘rebuilt’ engine/components because EASA recognises the term ‘rebuilt’ only as a manufacturing/production release (not a maintenance release) and only for engine.

Last updated:
30/10/2017

Link:
https://www.easa.europa.eu/en/faq/43770

Can I import a rebuilt engine and associated components from US?

Answer

Under the terms of the EU/US bilateral agreement (BASA) (see here), you can import an engine with a ‘rebuilt’ status in block 11, only when it has been released by the original engine manufacturer on a Form 8130-3 using the blocks 13a. to 13e. (left side).

Please note that Form 8130-3 with ‘rebuilt’ status are not acceptable for components other than engine (regardless whether it has been released on left or right side) therefore the components accompanying the rebuilt engine should either be released REPAIRED/OVERHAULED… (right side) or NEW (left side).

Last updated:
30/10/2017

Link:

https://www.easa.europa.eu/en/faq/43771

What does it mean ‘a release document issued by an organisation under the terms of a bilateral agreement signed by the European Union’ referred in AMC1 M.A.501(a)(1)/AMC1 145.A.42(a)(i)/AMC1 ML.A.501(a)(ii)?

Answer

AMC1 M.A.501(a)(1)/AMC1 145.A.42(a)(i)/AMC1 ML.A.501(a)(ii) refers to a release document issued by an organisation under the terms of any existing bilateral agreement signed by the European Union. Currently such agreements are signed with:

- USA
- Canada
- Brazil
- Japan (limited to design and production)
- China (limited to design and production)
- United Kingdom (limited to design and production)

Note:

For organisations approved under Part-CAO and Part-M Subpart F the situation is different. Credit can be taken for their technical capabilities and their competent authority oversight (FAA and TCCA). This situation is explained in AMC1 CAO.A.070(a) paragraph 2.8 and AMC M.A.613(a) paragraph 2.8.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19057

What kind of release document is considered equivalent to an EASA Form 1 under the terms of the US-EU Bilateral safety agreement? (AMC1 M.A.501(a)(1)/AMC1 145.A.42(a)(i)/AMC1 ML.A.501(a)(ii)/AMC1 CAO.A.070(a))

Answer

Under the terms of an EU/US bilateral agreement (BASA) (seehere):

Acceptance of NEW engine/components (and rebuilt engines) is governed by the Technical Implementation Procedure (TIP). The general principle is to accept such engine/components when released new on FAA Form 8130-3 using the blocks 13a to 13e (left side). Please refer to Section VII (from para 7.7 on) of the TIP for the detailed conditions under which this is acceptable.

Acceptance of USED engine/components from an US based repair station is governed by the Maintenance Annex Guidance (MAG). The general principle is to accept such engine/components when subject to ‘dual release’ on FAA Form 8130-3 (except where the component is not eligible for U.S.-registered aircraft), using the blocks 14a to 14e (right side).

- Block 11 should provide the status of the component (e.g. ‘overhauled’)
- Block 12 should include (or refer to) detailed information on the work performed, the associated approved data (e.g. ‘Overhauled in accordance with CMM 111, Section X, Rev 2, S/B 23 and FAA AD xyz complied with’) as well as the EASA Part-145 statement and approval number.
- Block 14 should at least show “Other regulation specified in block 12” ticked

Please refer to Appendix 1 of section B, paragraph 10 (Release and acceptance of components) of the MAG for the detailed conditions under which this is acceptable.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19058

What are the component release documents acceptable for installing a component (on aircraft or on a higher assembly) and releasing associated maintenance under EASA Part-145 regulation?

Answer

The linked reference table provides a table summarising the component release documents (FAA Form 8130-3, TCCA Form One, ANAC Form F-100-01…) acceptable to an EASA Part-145 organisation, depending on where such organisation is located and from which regulatory system the component is coming.

Last updated:
10/09/2024

Link:
https://www.easa.europa.eu/en/faq/66700

Part-M

Part-M: General

Continuing airworthiness management for each type of operator/ aircraft

Answer

		CONTINUING AIRWORTHINESS MANAGEMENT
Commercial operations	Licenced air carriers [1]	Continuing airworthiness shall be performed by a CAMO. Operator shall be CAMO approved (CAMO linked to the AOC).
	Commercial specialised operations or CAT operations other than licensed air carriers or commercial ATOs	Continuing airworthiness shall be performed by a CAMO. Operator shall obtain CAMO approval, or operator shall contract a CAMO
Other than commercial operations	Complex motor-powered aircraft [2]	Continuing airworthiness shall be performed by a CAMO. Owner shall contract a CAMO
	Other than complex motor-powered aircraft (CMPA) and limited operations [3]	Continuing airworthiness management may be performed by the owner. CAMO is not required.

[1] Licenced air carriers are EU air carriers holding an operating licence in accordance with Regulation (EC) 1008/2008

[2] Twin turboprop aeroplanes of 5 700 kg MTOM and below can be exempted by the Member State from complying with any requirements applicable to CMPA and shall instead comply with the requirements applicable to other than CMPA.

[3] Limited operations are defined in Regulation (EU) 1312/2014 Article 2(p).

Last updated:
07/10/2016

Link:
https://www.easa.europa.eu/en/faq/19038

Can an independent certifying staff maintain non-complex motor-powered aircraft used by commercial ATO or commercial DTO?

Answer

No, non-complex motor-powered aircraft used by commercial ATO or commercial DTO cannot be maintained by independent certifying staff because in accordance with M.A.201(h) or ML.A.201(e)(2), these aircraft require maintenance release by an approved maintenance organisation (Part-CAO with maintenance privilege, Part-M Subpart F or Part-145).

Note: 'GM1 ML.A.201(e)' provides examples of aircraft not considered to be operated by a commercial ATO or a commercial DTO.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19041

Which are the correct statements to be written in block 11 of EASA Form 1 after maintenance?

Answer

Appendix II to Part-M describes the following 4 permissible entries in block 11 of EASA Form 1:

- Overhauled,
- Repaired
- Inspected/tested
- Modified

The meaning of "Inspected/Tested" status is inspected and/or, if applicable, tested as it described in provisions of Part-M/Part-145. Besides that, block 12 in the EASA Form 1 should contain the detailed information on the status/work described in block 11.

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28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19044

Can a licenced pilot without a valid medical certificate perform pilot-owner maintenance?

Answer

This question arises because of the different understandings of license validity in Commission Regulation (EU) No 1178/2011 This question arises because of the different understandings of license validity in Commission Regulation (EU) No 1178/2011 (Aircrew) and No 1321/2014 (Continuing Airworthiness).

In Reg. (EU) 1321/2014, the pilot-owner authorisation described in M.A.803 or ML.A.803 assumes that a pilot has sufficient technical knowledge to perform certain maintenance tasks. While exercising such pilot-owner authorisation, the pilot-owner even further develops his/her competency in maintenance. Hence, in the case where the medical examination has not been conducted or not been passed and the licence has therefore lost its validity, it is the intent of the rule to allow the pilot-owner to continue using this authorisation as long as he/she still considers himself/herself physically fit (including good visual acuity) and competent to carry out such maintenance (ref. point (a)(2) of Appendix VIII to Part-M or Appendix II of Part-ML).

This is the reason why a new point (5) was introduced in AMC M.A.803 in 2016 (ED Decision 2016/011/R) stating: "not holding a valid medical examination does not invalidate the pilot licence (or equivalent) required for the purpose of the pilot-owner authorisation". For Part-ML the same information can be found in AMC1 ML.A.803 (ED Decision 2020/002/R).

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/47722

What are the responsibilities relevant to pre-flight inspection?

Answer

The pre-flight inspection forms part of the essential requirements for air operation, as required in Annex V (point 6.2) of the 'Basic Regulation' (Regulation (EU) 2018/1139). Being relevant to the aircraft's fitness for the intended flight, this essential requirement is implemented by the Commission Regulation (EU) 1321/2014 for continuing airworthiness in the following way:

Reference	Obligation	Who	Remark
M.A.201(d) ML.A.201(d)	Carry out pre-flight inspection satisfactorily	Part-M: Pilot-in-command or, in case of Licensed Air Carrier, a qualified staff under the responsibility of the operator (e.g. maintenance staff - see note) Part-ML: Pilot-in-command or a qualified person under the responsibility of the pilot-in-command	
M.A.301(a)/ ML.A.301(a)	Ensure pre-flight inspection is carried out	Owner or CA(M)O (according to M.A.201/ML.A.201)	
M.A.301(a)/ ML.A.301(a)	Ensure pre-flight inspection includes the actions necessary to ensure that the aircraft is fit to carry out the intended flight	Owner or CA(M)O (according to M.A.201/ML.A.201)	AMC M.A.301(a) points (1) and (2) elaborates those actions
M.A.301(a)/ ML.A.301(a) Additional information:	If a/c managed by CA(M)O: Provide training to ensure that pre-flight inspection is carried out adequately [AMC M.A.301(a) point (3)]	CA(M)O	Pre-flight inspection training described in the CAME part 1.11 or CAE part D.6
M.A.712(b)/ CAMO.A.200(a)(3)/ CAO.A.100(b)	If a/c managed by CA(M)O: Ensure pre-flight inspection is subject to the quality system/compliance monitoring [AMC M.A.301(a) point (3)]	CA(M)O	This is important because the pre-flight inspection contributes in feeding the process of aircraft continuing airworthiness

Note:

As per the definition of 'maintenance' in article 2 (h) of Commission Regulation (EU) 1321/2014, 'pre-flight inspection' (as defined in article 2(j)) is not considered maintenance. Therefore, it does not require a certificate of release to service [M.A.201(d)/ML.A.201(d)].

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/48482

Do declared training organisations (DTO) need a CAMO/CAO and approved maintenance organisations?

Answer

Regulation (EU) No 1178/2011 was amended in July 2018 to introduce Part-DTO as regards to declared training organisations

(ref. Reg. (EU) 2018/1119). Regulation (EU) No 1321/2014 was therefore amended and aligned the Continuing Airworthiness obligations of ATO with those of DTO.

This means:

		Complex motor-powered aircraft	Other than complex motor-powered aircraft
Commercial DTO	Applicable requirement	M.A.201(f) is applicable	M.A.201(h) or, for aircraft specified in Article 3(2), ML.A.201(e) are applicable
	Continuing airworthiness management	CAMO is required	CAO (with continuing airworthiness management privilege) or CAMO is required
	Maintenance	Part-145 organisation is required	CAO (with maintenance privilege) or Part-145 or Part-M Subpart F organisation is required
Non-Commercial DTO	Applicable requirement	M.A.201(g) is applicable	M.A.201(i) or, for aircraft specified in Article 3(2), ML.A.201(f) are applicable
	Continuing airworthiness management	CAMO is required	CAMO is not required CAO (with continuing airworthiness management privilege) is not required
	Maintenance	Part-145 organisation is required	With the exception of complex maintenance tasks under Part-M: CAO (with maintenance privilege) is not required Part-145 organisation not required Part-M Subpart F organisation is not required

Please also refer to GM1 ML.A.201(e) which provides examples of aircraft not considered to be operated by a commercial ATO or a commercial DTO.

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/65445

Airworthiness review

Can an airworthiness review certificate (ARC)/recommendation be issued after an airworthiness review with open findings?

Answer

Neither an ARC nor a recommendation can be issued with open findings. Each finding requires a corrective action before the issue of the ARC or recommendation. The corrective action should be adequate to the open finding and it should be carried out and verified by the airworthiness review staff (ARS) before the issue of the ARC/ recommendation.

Last updated:

15/12/2014

Link:
https://www.easa.europa.eu/en/faq/19048

Can the extension of an ARC be anticipated more than 30 days?

Answer

Assuming the aircraft satisfies the conditions for extension established in M.A.901 or ML.A.901, 30 days is the maximum allowed period for which the ARC extension can be anticipated without losing the continuity of the airworthiness review pattern. This means that the new expiry date is established as one year after the previous expiry date (AMC M.A.901(c)2, (e)2 and (f), ML.A.901(d)).

If the extension is anticipated by more than 30 days, the new expiry date will be established as one year after the date of extension.

Last updated:
06/09/2023

Link:
https://www.easa.europa.eu/en/faq/19050

Can airworthiness review staff (ARS) qualified under point CAMO.A.310 perform an airworthiness review of an aircraft on which they have previously released maintenance as certifying staff?

Answer

Point CAMO.A.310(a)(4) of Annex Vc (Part-CAMO) to Commission Regulation (EU) No 1321/2014 establishes that airworthiness review staff (ARS) in a Part-CAMO organisation must have a position within the approved organisation with appropriate responsibilities.

According to point (e) of AMC1 CAMO.A.310(a), an acceptable means to show compliance in respect of such position is to demonstrate independence from the airworthiness management process of the affected aircraft (this is to avoid possible conflict of interest). In the case where ARS qualified in accordance with point CAMO.A.310 is employed by an organisation holding both CAMO and maintenance organisation (Part-145 or Part-CAO) approvals, the second bullet point under point (e) of AMC1 CAMO.A.310(a) further specifies that this person should not have been involved in the release of the maintenance for the aircraft intended to undergo the airworthiness review, except in one of the following cases:

1. such maintenance has been released as required during the airworthiness review's physical survey of the aircraft (e.g. release necessary after visual inspections requiring panel opening); or
2. such maintenance has been released as a result of findings discovered during the physical survey of the aircraft (defect rectification).

In other cases where the CAMO ARS happens to be employed as certifying staff (CS) at another maintenance organisation, or happens to work as independent CS, the European Union Aviation Safety Agency (EASA) recommends the CAMO ARS to ensure absence of conflict of interest before allowing them to conduct the airworthiness review on aircraft on which they have previously released maintenance.

Remark

Point M.A.901(l) or point ML.A.903(b) of Annex I (Part-M) to Commission Regulation (EU) No 1321/2014: When the ARS is not qualified as CS, they must be assisted by CS in case maintenance needs to be released during the physical survey of the aircraft.

Last updated:
11/09/2025

Link:

https://www.easa.europa.eu/en/faq/19049

Can the airworthiness review certificate (ARC) of the Part-M aircraft be extended during the extensive maintenance/long term storage?

Answer

An ARC extension could be performed as long as:

1. the conditions established for controlled environment (M.A.901 (b)) are met. This means:
    a. continuously managed during the previous 12 months by a unique CAMO or CAO, and
    b. maintained for the previous 12 months by Part-145, Part-M Subpart F or Part-CAO organisations.

AND

2. there is no evidence or reason to believe that the aircraft is not airworthy, as stated in M.A.901(j).

Thus, the procedure for the extension established in the CAMO or CAO has to address verification of the compliance with 3 above mentioned conditions. An aircraft going through the lengthy maintenance/modification or long-term storage is not considered to meet the condition number 2.

Last updated:
29/01/2021

Link:
https://www.easa.europa.eu/en/faq/19062

Is an aircraft considered to be in controlled environment at the end of the ARC validity when that aircraft was received by the CA(M)O during the 90/30 days anticipation of the ARC issue/extension performed by the preceding CA(M)O?

Answer

CA(M)O 1 uses the anticipation when performing the airworthiness review or extension for 90 or 30 days correspondingly. After the issue or extension of the ARC, the aircraft is transferred during the anticipation period from CA(M)O 1 to CA(M)O 2. As the consequence CA(M)O 2 has solely continuously managed the aircraft for more than 12 months due to the term of the validity of the ARC accordingly being more than 12 months. Are the requirements of the M.A.901(b) point 1 satisfied?

The intent of the point M.A.901(b) point 1 is to define the ‘controlled environment’ (see also ML.A.901(c)(1)) by indicating that the aircraft must be managed during last 12 months by unique CA(M)O, which indirectly refers to a standard term of validity of the ARC. Therefore, if the aircraft has been managed by more than one CA(M)O since the date of issue of the last ARC or the date of issue of the ARC extension, it actually indicates that controlled environment was discontinued.

In addition, in accordance with M.A.901(n) or ML.A.903(d) the 90 days anticipation for the ARC issue shall be used to allow the physical review to be performed during a maintenance check. Hence the intention of the rule is not to address the transfer of the aircraft within those 90 days with the purpose of avoiding the forthcoming airworthiness review.

Concerning the ARC extension and its 30 days anticipation, point M.A.901(f) [AMC M.A.901(c)2, (e)2 and (f)] or ML.A.901(d) are intended for 2 consecutive extensions by the same CA(M)O managing the continuing airworthiness of the aircraft from the date of issue of the ARC. Therefore, an ARC extended for the first time by an organisation cannot be extended a 2nd time by another organisation, because this constitutes a ‘breach’ in controlled environment.

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29/01/2021

Link:
https://www.easa.europa.eu/en/faq/19063

Are EASA Forms 1 required during the import in the EU of an aircraft subject to Part-M?

Answer

For the import of an aircraft in the EU under Part-M regime, the provisions of M.A.904 require the accomplishment of an airworthiness review in accordance with point M.A.901.

Note: AMC M.A.904(a)(2) defines specific elements to be considered for imported aircraft.

However, when performing the airworthiness review of an imported aircraft in accordance with point M.A.901 and its AMC, it may happen that 'AMC M.A.901(k)' is not fully satisfied in which certain components subject to the review may not hold an EASA Form 1 (or equivalent under a bilateral agreement) In such a case, other component releases to service or serviceable tags may be acceptable for the competent authority of the importing Member State.

Nevertheless, it is important to ensure that the information required by M.A.305(c) and (d) related to the status of ADs, life accumulated by life-limited parts and time-controlled components, modifications and repairs is available.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19060

Technical records

Is there any European requirement to maintain the back-to-birth traceability for any component fitted to an European aircraft?

Answer

The term "back to birth" is not used in European regulations. The requirements that apply to a life-limited part or a service life-limited component (see definition in ML.A.503(a)) are basically stated in M.A.305 (d)&(e) or ML.A.305(e). All detailed maintenance records of a maintenance action (e.g. a restoration) must be kept until another maintenance action equivalent in scope (another restoration) is done, but never less than 36 months. Keep in mind that:

- a life-limited part or service life-limited component log card must be kept with all the relevant information, so the action should be recorded there, and
- the records showing compliance with other requirements stated in M.A.305 or ML.A.305, e.g. an airworthiness directive, or any other information that could be affecting the configuration of the aircraft, must be retained too.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19043

What does the term "detailed maintenance records" mean?

Answer

There has been a certain confusion about the understanding of "detailed maintenance records", because this term is used in a different context for continuing airworthiness management and approved maintenance organisation (AMO).

"Detailed maintenance records" as defined in M.A.614, 145.A.55(c) or CAO.A.90(a) are required to be kept by an AMO (respectively Part-M/F organisation, Part-145 organisation or CAO with maintenance privileges). Maintenance organisations are required to retain all detailed records in order to be able to demonstrate that they maintained aircraft and components in compliance with applicable requirements (see also remark).

"Detailed maintenance records" as defined in M.A.305(e)(2) or ML.A.305(h)(1) are those records, coming from the AMO1 having performed maintenance, required to be kept by the owner/operator (or the CAMO or CAO with Continuing airworthiness management privileges when required by M.A.201 or ML.A.201) allowing to determine the aircraft configuration, the airworthiness

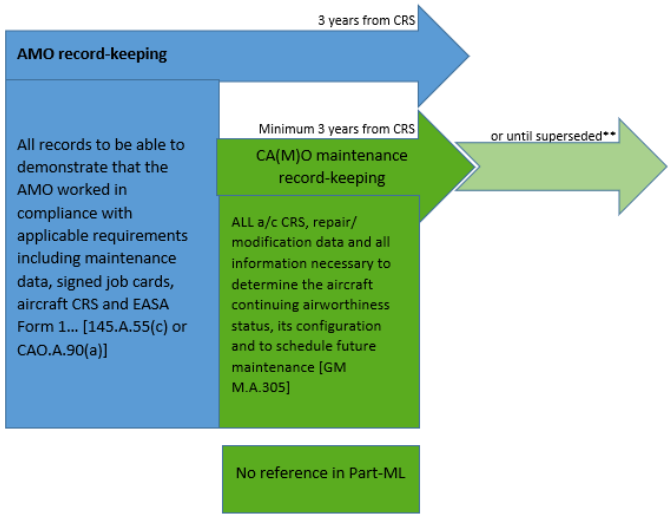
status of the aircraft and all components installed, as well as to plan future maintenance as required by the AMP, based on the last accomplishment.

Consequently, the AMO should transmit to the owner/operator/CA(M)O a certain subset of the AMO maintenance records, including the certificates of release to service and repair/modification data related to the performed maintenance, so that the owner/operator/CA(M)O can demonstrate compliance with M.A.305 or ML.A.305.

Not all AMO maintenance records need to be transferred from the AMO to the owner/operator unless they specifically contain information relevant to aircraft configuration/status and future maintenance. Thus, incoming certificates of conformity, batch number references and individual task card sign-offs verified by and/or generated by the maintenance organisation are not required to be transferred to the owner/operator/CA(M)O. However, dimensional information contained in the task card sign-offs or work packages may need to be transferred and kept by the owner/ operator.

It is to be noted that the record-retention period requirements are slightly different for the AMO and the CAMO and CAO with Continuing airworthiness management privileges. The AMO shall retain the records for 3 years, whereas the CAMO and CAO with Continuing airworthiness management privileges has to retain their records until they are superseded by new information (equivalent in scope and detail), but not less than 3 years. The starting point in both cases is when the aircraft or component maintenance has been released.

Remark: It is considered a best practice as part of the AMO record-keeping system, (and it is also required by certain competent authorities) to record information (e.g. batch number or other tracking reference) relevant to the identification of all standard parts and material used during any maintenance. This practice may limit safety and industrial risks in the case where a batch is recalled by the manufacturer. Such record does not need to be transmitted to the owner/operator/CAMO/CAO with Continuing airworthiness management privileges.



*: Transmitted records is a subset of AMO maintenance records provided to the CA(M)O. Certain transmitted records do not need to be kept as a record by the CA(M)O such as EASA Form 1 for a component with no scheduled maintenance task selected and not subject to AD or modification/repair.

**: by new information equivalent in scope and detail

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[1]*Or pilot-owner [M.A.803 or ML.A.803], or independent certifying staff [M.A.801(b)point 1 or ML.A.801(b)(2)]*

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19042

Is there an obligation to keep the EASA Form 1 for on-condition components?

Answer

There is no specific requirement to retain the EASA Form 1 of such components unless needed to comply with the requirements set forth in M.A.305(e) or ML.A.305(h) for determining the continuing airworthiness and configuration of the aircraft.

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Link:
https://www.easa.europa.eu/en/faq/19103

AMP (Aircraft Maintenance Programme)

What are the main principles governing the development of the AMP under Part-ML?

Answer

For aircraft complying with Part-ML (refer to Article 3(2) of Regulation (EU) No 1321/2014, the AMP should be based either on the applicable ICA or on the Minimum Inspection Programme (MIP) defined in ML.A.302(d).

The owner, when she/he has not contracted the continuing airworthiness management to a CAMO or CAO [see ML.A.201(f)], should 'declare' the AMP assuming responsibility for its content. Such declared AMP does not need to be sent to the competent authority. Except for the mandatory requirements (see also remark below) the owner may decide, under his/her full responsibility, to deviate from the applicable scheduled maintenance recommendations (including ICA if the AMP is not based on the MIP) without the need to justify such deviation(s) **(see GM1 ML.A.302)**.

If the aircraft is managed by a CAMO or CAO, such organisation should 'approve' the AMP. Deviations from the applicable scheduled maintenance recommendations (including ICA if the AMP is not based on the MIP) should be justified and properly recorded.

In both scenarios though (AMP declared by owner or approved by CAMO/CAO), when the AMP is not based on the MIP, the deviations to the applicable ICA **shall not result in a less restrictive** task than the corresponding MIP task. A clear overview of the different options for the development (including the source of information and potential customisation) and approval of such an AMP is provided by 'GM1 ML.A.201', 'GM2 ML.A.302'.

In addition, the AMP shall be reviewed annually. For declared AMP, this review should be done by the person who performs the airworthiness review during its accomplishment (see AMC1 ML.A.302(c)(9)). For approved AMP, the review can be done either by the Airworthiness Review Staff (ARS) during the airworthiness review or by the CAMO itself.

If during the airworthiness review it is observed that there are discrepancies on the aircraft linked to deficiencies in the content of the aircraft maintenance programme, the AMP must be amended. The competent authority shall be informed in the case where the ARS does not agree with the measures taken to amend the AMP.

Remarks:

In accordance with ML.A.302 and in particular ML.A.302(c)(4), the AMP, declared or approved, shall in all cases include all the mandatory maintenance/continuing airworthiness requirements, such as repetitive Airworthiness Directives or the Airworthiness Limitation Section (ALS).

References:

Please refer also to 'AMC2 ML.A.302' (EASA Form AMP), 'GM1 ML.A.302' and 'AMC1 ML.A.302(d)' (content of MIP).

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21/06/2019

Link:
https://www.easa.europa.eu/en/faq/43423

When does the calendar interval for the next aircraft or component maintenance task start?

Answer

In a normal scenario :

- The date of signing the certificate of release to service (CRS) should be considered to be the date of the accomplishment.
- The next due date should be calculated using this date.

However, there may be different considerations that render the normal scenario no longer applicable. For example:

Case 1: The interval of the maintenance task has been previously subject to a one-time extension using an approved procedure included in the aircraft maintenance programme (refer to Appendix I to AMC M.A.302 point 4) normally called ‘permitted variation’ or ’tolerance’. In this case the next due date should be calculated using the previous due date (as opposed to accomplishment date) or as agreed by the competent authority.

For aircraft regulated by Part-ML the situation is different when applying the tolerance of 1 month foreseen in ML.A.302(d), the next interval shall be calculated from the accomplishment date (refer to ML.A.302(d)(1) and AMC1 ML.A.302(d)).

Case 2: The maintenance task refers to a component maintenance task, for example the landing gear overhaul. In this case the start of the interval would be the date of the release to service after the overhaul of the landing gear or in some particular cases when specified in the maintenance data the interval may start from the date of installation on aircraft.

Case 3: The task is released as part of a maintenance check/visit, where the duration of the check/visit is significant compared to the interval of the task. In this case, there may be significant difference between date of accomplishment and date of release. For example, a check/visit that lasts for 2 months and an inspection that has an interval of 3 months. In this case, either the task is carried out on the last days of the maintenance check/visit and the next due date is calculated from the CRS, or the task is carried out at the beginning of the visit and the next due date should be calculated from the date of accomplishment.

There may be other examples, but the key principle is to use sound engineering judgment and the guidance provided in the Instructions for Continuing Airworthiness to calculate the next due date.

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Link:
https://www.easa.europa.eu/en/faq/19102

When should I revise my Aircraft Maintenance Programme (AMP)?

Answer

Part-M:

In accordance with M.A.302(h), the Aircraft Maintenance Programme (AMP) shall be subject to ‘periodic reviews’ and amended accordingly when necessary.

This means that the owner/operator/CA(M)O should review at a regular interval:

- new/modified maintenance instructions by the TC holder,
- modifications and repairs embodied in the particular a/c, which may require compliance to additional maintenance instructions (by Design Approval Holder),
- in-service experience collected for the particular a/c or for the fleet and
- changes in the type and specificity of operations.

Such a review allows to determine if an AMP revision is necessary to still comply with the obligations of M.A.302(h), and ensure that the AMP continues to be valid in light of the operating experience. As a minimum, point (3) of AMC M.A.302 states it should be at least annually.

However, this should not prevent amending the AMP outside of this formal periodic review, when a specific need arises. This may depend for example on in-service experience (e.g. adverse trend), nature of instruction revisions (e.g. significant reduction of TBO (time between overhaul)), the extent of instruction revisions (amount of affected tasks) as well as source of instruction revisions (e.g. MRBR, ALS, etc.)

When a revision of the ALS (Airworthiness Limitation Section) introduces a new or more restrictive task, EASA has the policy to issue an AD (Airworthiness Directive). Such an AD would typically mandate on one side the revised task accomplishment and on the other side the revision of the AMP itself, together with a compliance time for these two actions.

However, in accordance with point (3) of AMC M.A.302, EASA recommends to review the AMP as soon as possible in this case to avoid a disconnection between accomplished maintenance task(s) and maintenance task(s) listed in the AMP.

If the aircraft's continuing airworthiness is being managed by a CA(M)O, the CA(M)E (Continuing Airworthiness Management Exposition/Combined Airworthiness Exposition) should describe the AMP revision policy (including 'periodic review') under point 1.2 [Appendix V to AMC M.A.704], point 1.2 [AMC1 CAMO.A.300] or point D.3 [AMC1 CAO.A.025].

Remark: In the case where the source documents are amended without having an effect on the AMP content, it is acceptable to use an indirect approval procedure (if granted by the competent authority in accordance with M.A.302(c)) to amend the relevant source document references in the AMP.

Part-ML:

ML.A.302(c)(9) requires an annual review of the AMP.
For aircraft regulated by Part-ML the review of the AMP may be carried out with the airworthiness review (AR) of the aircraft by the person who performs such AR.

Such a review allows to determine if an AMP revision is necessary to still comply with the obligations of ML.A.302(c) or ML.A.302(d) and ensure that the AMP or MIP continues to be valid in light of the operating experience. As a minimum, ML.A.302(c)(9) states it should be at least annually.

However, this should not prevent amending the AMP outside of this formal periodic review, when a specific need arises. This may depend for example on in-service experience (e.g. adverse trend), nature of instruction revisions (e.g. significant reduction of TBO (time between overhaul)), the extent of instruction revisions (amount of affected tasks) as well as source of instruction revisions (e.g. MRBR, ALS, etc.)

However, in accordance with ML.A.302(c)(9), EASA recommends to review the AMP as soon as possible in this case to avoid a disconnection between accomplished maintenance task(s) and maintenance task(s) listed in the AMP.

If the aircraft's continuing airworthiness is being managed by a CA(M)O, the CA(M)E (Continuing Airworthiness Management Exposition/Combined Airworthiness Exposition) should describe the AMP revision policy (including 'periodic review') under point 1.2 [Appendix V to AMC M.A.704], point 1.2 [AMC1 CAMO.A.300] or point D.3 [AMC1 CAO.A.025].

Remark:

AMP regulated by Part-ML are declared by the owner or approved by the CAMO or CAO (ML.A.302(b)).

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Link:
https://www.easa.europa.eu/en/faq/47406

Can a competent authority require the owner/CAMO/CAO to include national requirements in the Aircraft Maintenance Programme (AMP), based on M.A.302(d)(1)?

Answer

Although the Member State's competent authorities are responsible for approving the AMP, the intention of the rule is that they should not impose aeronautical instructions (such as national requirements) in addition to the instructions for continuing airworthiness (ICA) issued by the design approval holder during the certification process with the Agency. The Agency is, on behalf of the Member States, the competent authority for initial airworthiness as per Article 77(1) of Regulation (EU) 2018/1139 (the EASA 'Basic Regulation'). Following M.A.302(d)(2), those ICA shall be the basis to develop an AMP.

Nevertheless, competent authorities may issue alternate instructions to ICA when such instructions aim to offer flexibility to the operator [AMC M.A.302(d) point (2)].

Additionally, the mentioned AMC facilitates the rare case, where there has been no ICA issued by the design approval holder for a particular aircraft, modification, repair or STC (Supplemental Type Certificate): competent authorities may issue relevant instructions for the AMP in this case.

Remarks:

- The airworthiness (initial and continuing) of the aircraft for which the Basic Regulation is not applicable, has to comply solely with the national rules of the state of registry; and
- There is no equivalent of US CFR Title 14 Part-43 Appendix E/Part-91 (§91.411) or Part-43 Appendix F/Part-91 (§91.413) in the EU system.

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02/02/2021

Link:

https://www.easa.europa.eu/en/faq/47696

How is it possible to escalate AMP task intervals?

Answer

Part-M

General:

Some general expectations for escalation initiatives are described in the following paragraph:

a) It should be ensured that the AMP continues to be valid in light of the operating experience [M.A.302(h) – see FAQ n.47406].

b) It should form part of the analysis of the effectiveness of the AMP (if required by M.A.301(e)),

c) The AMP should include a procedure to manage the escalation of established intervals [AMC M.A.302 point (4) and point (2) of AMC M.B.301(c)].

Supported by a formal reliability programme if required by M.A.302(g) or voluntarily implemented [AMC M.A.302(d) point (6)] or collection and analysis of in-service experience.

'Appendix I to AMC M.A.302 and AMC M.B.301(b)' provides detailed guidelines for the integration of this information into the AMP.

d) If there is a CA(M)O involved, those points also have to be emphasised within the CA(M)E, as specified in Appendix V to AMC1 M.A.704, AMC1 CAMO.A.300 or AMC1 CAO.A.025.

Two different cases:

The escalation of AMP task intervals falls into the alternative instructions proposed by the owner/CA(M)O [M.A.302(e)] and distinguishes in the following cases:

Case 1:

Escalation of safety-related task intervals, which consist of all mandatory tasks (Airworthiness Limitation Section) as well as certain non-mandatory tasks issued by the DAH (Design Approval Holder) such as various MRBR (Maintenance Review Board Report) tasks [see note below], tasks related to emergency equipment, critical components…

Case 2:

Escalation of non-safety-related task (e.g. non-safety related MRBR task or a task recommended by a Service Letter) intervals

Note:
In cases, where the aircraft type has been subjected to the MRB process, the following MRBR tasks should be considered safety-related:

- *Failure Effect Category (FEC) '5' (evident safety) and '8' (hidden safety) tasks (systems and powerplant)*
- *SSI (Structural Significant Item) tasks*

- *L/HIRF (Lightning / High Intensity Radiated Field) tasks (as applicable)*
- *Stand-alone EWIS tasks (EZAP procedure)*

Escalation approval:

The approval of a task escalations is addressed separately for each case:

Regarding case 1:

1.1 Escalation of mandatory tasks represents a change of the initial type design and therefore must be discussed and agreed between the DAH and the Agency*.
1.2 The AMP revision proposal and the information used to substantiate the escalation of non-mandatory tasks [AMC M.B.301(b)(6)] have to be evaluated by the competent authority [AMC M.B.301(b) point (2)]. Following a positive evaluation, a direct approval of the AMP revision will be issued by the competent authority, as stated in M.A.302(e).

Regarding case 2:

An **indirect approval** of the AMP through a CA(M)O is possible and described in more detail in FAQ n.19061.

** Exception may exist under certain condition for Two Star CMR (Certification Maintenance Requirement) (see AMC 25-19).*

Remarks:

- In all cases, task de-escalation may need to be considered based on the supporting data [AMC M.A.302(g) point (4)].
- Escalation should not be confused with 'permitted variations' to AMP intervals, which applies to a unique aircraft for a unique occasion ['Appendix I to AMC M.A.302 point (4)].

Part-ML

General:

Some general expectations for escalation initiatives are described in the following paragraph:

a) It should be ensured that the AMP continues to be valid in light of the operating experience [[ML.A.302(c)(9) – see FAQ n.47406].

b) The effectives of the AMP should be assessed at least by an annual review [ML.A.302(c)(9)].

c) The AMP may include additional maintenance actions [ML.A.302(c)(3)] supported by collection and analysis of in-service experience.

'GM1 ML.A.302(c)(3)' provides detailed guidelines for the integration of this information into the AMP.

d) If there is a CA(M)O involved, those points also have to be emphasised within the CA(M)E, as specified in Appendix V to AMC M.A.704, AMC1 CAMO.A.300 or AMC1 CAO.A.025.

Two different cases:

The escalation of AMP task intervals falls into the alternative instructions proposed by the owner/CA(M)O [GM1 ML.A.302(c)(2)(b)] and distinguishes in the following cases:

Case 1:

Escalation of safety-related task intervals, which consist of all mandatory tasks (Airworthiness Limitation Section) as well as certain non-mandatory tasks issued by the DAH (Design Approval Holder), tasks related to emergency equipment, critical components…

Case 2:

Escalation of non-safety-related task (e.g. task recommended by a Service Letter) intervals

Escalation approval:

The approval of the escalation is carried out by the CAMO or CAO [ML.A.302(b)(2)]. For declared AMP no approval is needed [ML.A.302(b)(1)].

Remarks:

- In all cases, task de-escalation may need to be considered based on the supporting data.

- Escalation should not be confused with ‘permitted variations’ to AMP intervals, which applies to a unique aircraft for a unique occasion [GM1 ML.A.302(c)(3)].

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02/02/2021

Link:
https://www.easa.europa.eu/en/faq/48248

What kind of alternative (other than escalation) or additional instructions can be introduced in the AMP?

Answer

For guidance on the escalation of AMP task intervals, please refer to FAQ no.48248.

Examples of alternative/additional instructions to the Design Approval Holder’s (DAH) Instructions for Continuing Airworthiness (ICA) are listed below [see point (7) of AMC M.A.302(d):

1. De-escalation of task intervals (i.e. ‘more restrictive intervals’). Regardless of the source of the task, this may be eligible to indirect approval [see FAQ n.19061].

2. Additional scheduled maintenance tasks selected by the operator on voluntary basis (e.g. operator policy for interiors), or manufacturer recommendations outside ICA (e.g. Service Letter) linked to product improvements or maintenance practices... Depending on their nature, those tasks may be added, changed and deleted through the indirect approval [see FAQ n.19061].

Remark:

Additional and de-escalated tasks may originate from the reliability programme as indicated in point (4) of AMC M.A.302(g).

3. Concerning changes in task type (e.g. from General Visual Inspection to Detailed Inspection, or from Operational Check to Functional Check), by analogy with the escalation [see FAQ no.48248] EASA recommends that for safety-related tasks such changes are directly approved by the competent authority. For non-safety related tasks, the competent authority may accept an indirect approval.

For Part-ML aircraft, the principles of the AMP development are described in FAQ n.43423.

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Link:
https://www.easa.europa.eu/en/faq/48249

CAMO (Continuing Airworthiness Management Organisation)

Are deputies to nominated persons required in CAMO or CAO?

Answer

Part-M Subpart G, Part-CAMO and Part-CAO do not contain specific requirements for the identification of deputies to “nominated persons” as it is foreseen in Part-145 (145.A.30(b)(4)).

Nevertheless, the CAMO or CAO needs to take into account the conditions for the continued validity of the approval laid down in M.A.715, CAMO.A.135 or CAO.A.110, in particular in case of findings or in case of changes.

The CAMO or CAO should ensure that they remain in compliance even during short/medium absence of the nominated persons, this could be achieved by identifying in the CAME or CAE “one or several deputies” and the conditions under which the deputies will assume such responsibility. For longer absence of the nominated person, it is recommended to identify a new nominated person. For Part-M Subpart G organisations, the nomination and acceptance by the competent authority is done using the EASA Form 4. For Part-CAMO and Part-CAO approvals no EASA Form 4 is foreseen and the acceptance by the competent authority is formalised by the approval of an amendment to the exposition.

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Link:
https://www.easa.europa.eu/en/faq/19046

Under which condition can a CAMO or CAO use the indirect approval procedure to amend AMP (Aircraft Maintenance Programme) task(s) under Part-M?

Answer

The indirect approval procedures may only be used for:

- non-safety-related tasks as described in case 2 of FAQ n.48248 and example 3 of FAQ n.48249

- de-escalated tasks as described in example 1 of FAQ n.48249

- additional tasks as described in example 2 of FAQ n.48249

- editorial issues, typos, etc., (without having an effect on the AMP content)

In such case, as required by M.A.302(c) and M.B.301(c), the CAME (Continuing Airworthiness Management Exposition) or CAE (Combined Airworthiness Exposition) must include, and the competent authority shall approve, a procedure describing as a minimum:

- which AMP amendments are eligible for indirect approval;
- who in the organisation is responsible to issue the indirect approval;
- how the amendments are controlled; and
- how and when the competent authority is informed of an AMP amendment.

Based on M.A.302(c), the indirect approval may only be used when:

- the aircraft is managed by a CAMO/CAO or there is a limited contract between the owner and the CAMO/CAO for the development and approval of the AMP;
- and
- the aircraft managed by the CAMO/CAO is registered in the Member State ensuring the oversight of this CAMO/CAO (unless an agreement exists between the competent authority for the AMP and the competent authority of the CAMO/CAO).

Remark

AMPs regulated by Part-ML are not subject to an approval by the competent authority.

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Link:
https://www.easa.europa.eu/en/faq/19061

Does the CAMO or CAO compliance monitoring/quality system need to be subject to internal audit?

Answer

Yes, the compliance monitoring/quality system is part of the activities of the CAMO or CAO and therefore it should be monitored by internal audit.

Points M.A.712(b), CAMO.A.200(a)(6) or CAO.A.100(b) requires that the compliance monitoring/quality system monitors the compliance of the organisation with its relevant requirements and procedures.

The compliance monitoring/quality procedures are considered to be within the scope of this monitoring function. Therefore, the compliance monitoring/quality system should also be subject to audits and the CAMO or CAO audit programme/plan needs to reflect this.

Besides that, the audits conducted in respect of the compliance monitoring/quality system should satisfy the requirement of

independence. This means that audits should be carried out by personnel not responsible for the functions, procedures or products being checked.

So, the compliance monitoring/quality staff cannot audit the compliance monitoring/ quality system themselves because of the necessary independence of the audit. Therefore, to audit the compliance monitoring/quality system, it is acceptable:

- to use competent personnel from a different section/department in the same organisation not responsible for the compliance monitoring/quality function/ procedure, or,
- to contract the independent audit element of the compliance monitoring/quality system to another organisation or a qualified competent person, or,
- that the compliance monitoring/quality system is monitored and certified against an internationally recognised standards by a certification organisation.

The way the compliance monitoring/quality system is going to be audited has to be described in the CAME or CAE and approved by the competent authority.

For a small CAO, as defined in CAO.A.100(e), the quality system may be replaced by regular organisational review. Further information on the organisational review can be found in ‘AMC1 CAO.A.100(f)’ and ‘Appendix II to AMC1 CAO.A.100(f)’.

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Link:
https://www.easa.europa.eu/en/faq/19047

The requirement to establish a procedure to assess non-mandatory modifications/inspections pursuant to CAMO.A.315(b)(4) refers to the “use of the organisation’s safety risk management process”. What does this mean?

Answer

The CAMO has the obligation, for complex motor-powered aircraft and aircraft used by air carriers licensed in accordance with Regulation (EC) No 1008/2008, to establish a procedure to assess non mandatory modifications and inspections (e.g. Service Bulletins).

This assessment should result in a decision to implement or not the recommendation provided in such non-mandatory information (e.g. perform the inspection, embody the modification, amend the aircraft maintenance programme (AMP)).

This assessment procedure should take into consideration several aspects, as the case may be, including but not limited to:

- the applicability to the operator’s fleet (e.g. type of operating environment, utilization, aircraft configuration);
- achievement of operator’s safety objectives;
- mitigating potential aviation safety risks already identified by the operator;
- mitigating potential aviation safety risks not yet apparent to the operator but identified by other operators or TC/STC holder, for aircraft in a similar operational environment;
- reliability improvement of the aircraft and components; and
- improvement of the effectiveness of the AMP.

In case of potential aviation safety risks, the CAMO should review the hazard(s) identified in the recommendation and the proposed maintenance action and its timeframe (i.e. timeline to embody the modification or amend the AMP). This is the main purpose of the expression “making use of the organisation’s safety risk management process”. If necessary, the CAMO will perform a safety risk assessment (e.g. in terms of probability and severity of consequences) and a review of the related mitigations.

Typically, SBs are issued for technical purposes (as mitigation or safety risk control). For instance, a SB could provide the following:

- an elimination of an identified hazard by the embodiment of a modification, or
- reducing the safety risk (i.e. the severity and/or likelihood) of the consequences of an identified hazard by the embodiment of a modification, or
- reducing the likelihood of the consequences of an identified hazard by performing repetitive inspections.

Since SBs are also used for other purposes (e.g. optional equipment installation, commercial retrofit) and not only for potential

safety-related situations, it is not required to use safety risk management process for each SB.

The CAMO should use its safety risk management process to determine if the hazard identified in the SB applies to the managed fleet and what the associated risk is, and/or whether the proposed action (modification/inspection) are applicable, effective and reasonable. For clarity, it is not intended that the CAMO should redo the safety assessment performed by the design approval holder; the CAMO assessment should be tailored to its fleet and related operations.

The referred CAME procedure for the assessment of non-mandatory modifications and inspections should ideally describe the decision-making process and mandate to record the decision taken and its justifications (e.g. based on considerations of costs vs benefits such as safety or reliability).

The decision to embody a modification may require the change management process to be followed to ensure proper coordination between the aircraft operator, the CAMO and the approved maintenance organisation. For example, a modification that affects Mass and Balance, requires maintenance check flights, introduces revised flight manual procedures, maintenance manual procedures, changes to the AMP, which needs to be managed to ensure proper dissemination of the information, training, review of existing hazards, and review of risk assessment, as applicable.

Last updated:
04/07/2022

Link:
https://www.easa.europa.eu/en/faq/136743

Part-145

Part-145: General

Is Part-M applicable to approved Part-145 organisations?

Answer

Yes, in addition to the Part-M or Part-ML provisions directly referred to in Part-145 (such as reference to point M.A.304 or ML.A.304 in 145.A.48), certain other requirements laid down in Part-M or Part-ML should also be considered by these organisations. Guidance on this subject is given in ‘GM Article 4(1)’.

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Link:
https://www.easa.europa.eu/en/faq/19036

What does the term ‘occasional’ mean in 145.A.75(c)?

Answer

Within the privilege described in 145.A.75(c) an aircraft maintenance organisation (AMO) may perform line maintenance activity (Part-145) in other-than-approved locations, provided it is considered as ‘occasional’. There is no formal definition of ‘occasional’ in the regulation, AMC and GM, but this privilege should be used to support an operator with which the AMO is already in contractual relation, when this operator needs line maintenance service for a short period at a new location due to a **special occasion or particular reason** (e.g. one-time flights, short term contracts/flight destination, flight schedule changes, special event at a particular location such as European athletics championship in Berlin, 6-12 August 2018, etc.) or the owner needs supporting maintenance service for a short period at a new location due to a **special occasion or particular reason**.

Subject to the approval by the Competent Authority, the maintenance organisation should develop in the MOE (e.g. Chapter 2.24 Reference to Specific Maintenance Procedures) the generic procedures to be followed in such a case: how to assess whether the maintenance can be performed, availability of tools/ equipment/ material/ components/ maintenance data, staff, adequacy of the

facilities, environmental conditions, quality system, record keeping, need to report these cases to the competent authority, etc. In addition, the procedure should include the criteria (e.g. maximum service duration without gap in the continuity; limitation in the repetition of the need* at one given location) to classify the activity as 'occasional line maintenance'.

** In principle, the repetitive use of this privilege at the same location should not be considered, and for repetitive needs, an approved line station should normally be established at that location.*

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02/02/2021

Link:
https://www.easa.europa.eu/en/faq/21265

How to easily update the "EASA Form 1 – MF/145 Issue 2" to "EASA Form 1 – MF/CAO/145 Issue 3"?

Answer

Purpose of the FAQ

This FAQ is intended to recommend the industry and national competent authority (NCA) an easy way to implement the 'EASA Form 1 Issue 3', applicable from 24.03.2020, by the Maintenance organisations.

Description of the issue

The Regulation (EU) 2019/1383 updated the Appendix II to Annex I (Part-M) — Authorised Release Certificate — EASA Form 1 by changing the footer of the form in order to add the reference of the Part-CAO.

Some organisations may still have in stock hardcopies of EASA Form 1 Issue 2.

In such case, due to the fact that there is no change in the content of the EASA Form 1 or/and in its completion methodology, for the Part-145 and Part-M, Subpart F approved organisations, the change can be done by:

- crossing out the footer in an 'EASA Form 1 – MF/145 Issue 2' and replacing it by 'EASA Form 1 – MF/CAO/145 Issue 3'; or
- accompanying the Form 1 with a communication explaining that the footer should be read as 'EASA Form 1 – MF/CAO/145 Issue 3' in accordance with the MOE/MOM procedure; or
- by other means acceptable to the NCA.

Last updated:
23/10/2020

Link:
https://www.easa.europa.eu/en/faq/119322

How did you install a Commercial Off-The-Shelf (COTS) equipment without EASA form-1? How do you arrange Part-145 side actually?

Answer

Please check for the answer published here.

Last updated:
06/12/2021

Link:
https://www.easa.europa.eu/en/faq/134264

Quality system

Does the Part-145 or Part-CAO quality system need to be subject to monitoring?

Answer

Yes, the quality system is part of the activities of the Part-145 organisation and therefore it should be monitored.

Point 145.A.65 (c) or CAO.A.100 (b) (1) requires that the quality system monitors that the activities are (being) performed in accordance with the approved procedures. The quality system procedures are included within these approved procedures. This implies that quality system must be subject to audits and the Part-145 or Part-CAO organisation audit programme/plan needs to reflect this.

Besides that, the audits of the quality system shall satisfy the requirement of independent audits. This is further explained in AMC 145.A.65(c)(1) point 11: the independence of the audits should be established by always ensuring that audits are carried out by personnel not responsible for the functions, procedures or products being checked. So, the quality manager cannot audit the quality system in terms of independence of the audit. For Part-CAO this subject is explained in AMC1 CAO.A.100(b).

Therefore, to audit the quality system, it is acceptable to:

- use competent personnel from a different section/department in the same organisation not responsible for the quality function/procedure, or,
- contract the independent audit element of the quality system to another organisation or a qualified competent person.

The way the quality system is going to be audited has to be described in the MOE or CAE and approved by the competent authority.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19054

Certification of maintenance

With respect to blend out repairs, is it required to record the depth and area dimensions of material removed during a blend out repair or is it sufficient to simply record that the damage has been repaired as per the SRM?

Answer

Yes, the dimensions of the damage and the removed/remaining material should be recorded. This is a very important information in order to assess whether further damage (adjacent or at the same spot) at a later stage would be allowable or not. In addition, it is a safeguard measure in order to be able to determine, during audits, whether the person correctly determined that the damage was within limits.

Last updated:
15/12/2014

Link:
https://www.easa.europa.eu/en/faq/19053

Can the subcontractor of a Part-145 or Part-CAO organisation release maintenance?

Answer

One of the fundamentals of subcontracting activities is that, during such maintenance, the Part-145 approval is extended to include the subcontractor activities. Subcontracting can be done only if the Part-145 has approved procedures to do it (145.A.75(b)) and the MOE is amended to reflect this new subcontractor.

A certificate of release to service can be issued by a person from the subcontractor who has received a certification authorisation from the Part-145 organisation in accordance with the certification authorisation procedure of the MOE including the assessment of competence.

The certificate of release to service and the EASA Form 1 will always be issued under the maintenance organisation approval reference.

For maintenance by Part-CAO the situation is different. Only ‘specialised services’ (e.g. NDT) can be subcontracted to another organisation, in accordance with the appropriate procedure set out in the CAE and approved by the competent authority (CAO.A.095(a)(2)). In accordance with AMC1 CAO.A.025 the procedure should be part of chapter B.7 ‘Subcontracting’.

A certificate of release to service can be issued by a person from the other organisation who has received a certification authorisation from the CAO in accordance with the certification authorisation procedure of the CAE.

The certificate of release to service will always be issued under the CAO approval reference.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19051

Release to service of NDT tasks by Part-145 or Part-CAO organisations

Answer

This answer is separated in two tables. One table is for organisation holding a Part-145 approval and the second table is for organisations holding a Part-CAO approval.

Part-145:

Part-145 organisation	Certifying staff required	Qualification system	General Release procedure	Release procedure for an NDT inspection
Aircraft (class A)	The release of the aircraft maintenance carried out under A class rating has to be performed by certifying staff holding a Part-66 licence. (B1 or B3 or C or L certifying staff under the organisation’s A rating.)	Licencing of personnel has to follow Part-66 regulation.	The release is either on the aircraft technical log or issuing an aircraft release to service statement.	A Part-145 organisation holding an A approval rating on a particular aircraft type and having in its approved scope of work NDT inspections for this aircraft type. This organization needs to have part-66 certifying staff and NDT personnel qualified in accordance with 145.A.30(f). In this case the NDT inspector performs the NDT task and signs off the work order. The aircraft is released by appropriately qualified B1, B3, C or L certifying staff under the organisation’s A rating. Please note that the release may include not only the NDT task but also the associated tasks (removal of panels, blankets, wires, re-installation, etc), or the NDT task may be part of a base maintenance check.

Engines Class B	The release of the engine maintenance carried out under B class rating has to be performed by engine's certifying staff.	The certifying staff is qualified following the procedures established by the organisation in compliance with the competent authority requirements. Part-66 licence is not required.	The release of works performed under class B is done on an EASA Form 1 (or by means of an internal release document when this component is for the organisation's own use and the organisation has in place the related internal procedures in the MOE).	A Part-145 organisation holding a B rating approval on a particular engine type and having in its approved scope of work NDT inspections for this engine type. This organization needs to have "engine" certifying staff (qualified in accordance with company procedures) and NDT personnel qualified in accordance with 145.A.30(f). In this case the NDT inspector performs the NDT task and signs off the work order. The engine certifying staff releases the works performed to the engine (including NDT inspection) on an EASA Form 1.
Components Class C	The release of the component maintenance carried out under C class rating has to be performed by components certifying staff (CCS).	The certifying staff is qualified following the procedures established by the organisation in compliance with the competent authority requirements. The CCS is not required to have a Part-66 licence.	The release of works performed under class C is done on an EASA Form 1 (or by means of an internal release document when this component is for the organisation's own use and the organisation has in place the related internal procedures in the MOE).	A Part-145 organisation holding a C rating approval on a particular component and having in its approved scope of work NDT inspections for this component. This organization needs to have CCS and NDT personnel qualified in accordance with 145.A.30(f). In this case the NDT inspector performs the NDT task and signs off the Work Order / Engineering Order. The CCS releases the works performed to the component (including NDT inspection) on an EASA Form 1.

Specialised services	The release of the maintenance carried out under D1 class rating has to be performed by “specialised services” certifying staff.	The certifying staff is qualified following the procedures established by the organisation in compliance with EN4179, Part-66 licence is not required.	The release of works performed under class D1 rating is done on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the MOE in compliance with 145.A.50 and approved by the competent authority.	A Part-145 organisation holding a D1 approval on a particular NDT method. The approved scope of work will be NDT inspections on this method. This organisation needs to have NDT certifying staff qualified in accordance with 145.A.30(f). In this case the NDT certifying staff performs and releases the NDT task on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the MOE in compliance with 145.A.50 and approved by the competent authority.

Note: In case of non-EU organisations approved by the EASA in accordance with Part-145, the Part-66 licence could be read as “Part-66 or national licence in accordance with Part-145 Appendix IV”

Part-CAO:

Part-145 organisation	Certifying staff required	Qualification system	General Release procedure	Release procedure for an NDT inspection

Aircraft (class aeroplanes, helicopter, airships, balloons or sailplanes)				A Part-CAO organisation holding an aeroplanes, helicopter, airships, balloons or sailplanes particular aircraft type or and having in its approved scope of work NDT inspections for this aircraft type. This organization needs to have part-66 certifying staff and NDT personnel qualified in accordance with CAO.A.035(f).
	The release of the aircraft maintenance carried out under A class rating has to be performed by certifying staff holding a Part-66 licence.	Licencing of personnel has to follow Part-66 regulation.	The release is either on the aircraft technical log or issuing an aircraft release to service statement.	In this case the NDT inspector performs the NDT task and signs off the work order. The aircraft is released by appropriately qualified B1, B3 or L certifying staff under the organisation’s aeroplanes, helicopter, airships, balloons or sailplanes rating. Please note that the release may include not only the NDT task but also the associated tasks (removal of panels, blankets, wires, re-installation, etc), or the NDT task may be part of a base maintenance check.

Engines or Components other than complete engines Class Components	The release of the engine maintenance carried out under components class rating has to be performed by ‘engine’s’ or ‘components other than complete engines‘ certifying staff.	The certifying staff is qualified following the procedures established by the organisation, Part-66 licence is not required.	The release of works performed under class components is done on an EASA Form 1 (or by means of an internal release document when this component is for the organisation’s own use and the organisation has in place the related internal procedures in the CAE).	A Part-CAO organisation holding a components rating approval on a particular engine type or ‘components other than complete engines‘ and having in its approved scope of work NDT inspections for this engine type. This organization needs to have “engine” or ‘components other than complete engines‘ certifying staff (qualified in accordance with company procedures) and NDT personnel qualified in accordance with CAO.A.035(f). In this case the NDT inspector performs the NDT task and signs off the work order. The engine or ‘components other than complete engines‘ certifying staff releases the works performed to the engine or ‘components other than complete engines‘ (including NDT inspection) on an EASA Form 1.
Components Class C	The release of the component maintenance carried out under C class rating has to be performed by components certifying staff (CCS).	The certifying staff is qualified following the procedures established by the organisation in compliance with the competent authority requirements. The CCS is not required to have a Part-66 licence.	The release of works performed under class C is done on an EASA Form 1 (or by means of an internal release document when this component is for the organisation’s own use and the organisation has in place the related internal procedures in the MOE).	A Part-145 organisation holding a C rating approval on a particular component and having in its approved scope of work NDT inspections for this component. This organization needs to have CCS and NDT personnel qualified in accordance with 145.A.30(f). In this case the NDT inspector performs the NDT task and signs off the Work Order / Engineering Order. The CCS releases the works performed to the component (including NDT inspection) on an EASA Form 1.

Specialised services	The release of the maintenance carried out under ‘Specialised Services’ class rating has to be performed by “specialised services” certifying staff.	The certifying staff is qualified following the procedures established by the organisation in compliance with EN4179, Part-66 licence is not required.	The release of works performed under class ‘Specialised Services’ rating is done on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the CAE in compliance with CAO.A.070(a) and approved by the competent authority (AMC1 CAO.A.070 (a)(1)).	A Part-CAO organisation holding a ‘Specialised Services’ approval on a particular NDT method. The approved scope of work will be NDT inspections on this method. This organisation needs to have NDT certifying staff qualified in accordance with CAO.A.035(f). In this case the NDT certifying staff performs and releases the NDT task on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the CAE in compliance with CAO.A.070 and approved by the competent authority.

Note: In case of non-EU organisations approved by the EASA in accordance with Part-145, the Part-66 licence could be read as “Part-66 or national licence in accordance with Part-145 Appendix IV”

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19055

We are a maintenance organisation approved for component maintenance (B/C-rated Part-145 organisation, or Part-CAO with class “component”). Can we issue a “removed serviceable” EASA Form 1 for a component removed from an engine/component off-aircraft in our organisation?

Answer

The current point 2.6 of AMC2 145.A.50(d) or AMC1 CAO.A.070(a) refers to the issue of an EASA Form 1 for serviceable aircraft components removed from serviceable aircraft registered in a Member State (*).

This AMC provision is to be used only for components removed from serviceable Member State registered**aircraft**, not from engine/component off-aircraft, regardless of whether such engine/component is serviceable or not. Components removed from a higher assembly (engine or another component) off-aircraft are expected to undergo workshop maintenance in accordance with the relevant maintenance data before the EASA Form 1 (certifying such maintenance) is issued.

Note that an A-rated Part-145 maintenance organisation or a Part-CAO organisation with class “aircraft’’ can issue an EASA Form 1 following a “removed serviceable” procedure for a (sub)component removed from a higher assembly component when such higher assembly is still installed on (or temporarily removed from) serviceable Member State registered aircraft, following the procedure of the referred AMCs.

(*) means an aircraft which is registered in a Member State and holds a valid (R)CofA issued in accordance with Reg. (EU) No 748/2012 and an ARC.

Last updated:

22/10/2024

Link:
https://www.easa.europa.eu/en/faq/140533

We are a maintenance organisation approved for component maintenance (B/C-rated Part-145 organisation, or Part-CAO with class "component"). Can we issue an EASA Form 1 in accordance with point 145.A.50(d) after maintenance performed on an engine/component on-wing on a non-EU-registered aircraft?

Answer

Non-EU countries are sovereign to set acceptable procedures to be followed on aircraft under their register. They can establish that components maintained by organisations approved in accordance with Part-145 (or Part-CAO) of Regulation (EU) No 1321/2014 and released with an EASA Form 1 can be installed on aircraft on their register.

Since component removed from third-country aircraft may be subject (under certain conditions) to off-wing component maintenance by Part-145 (or Part-CAO) organisation (with the issue of an EASA Form 1 after maintenance), there is no objection that a B/C-rated Part-145 organisation (or a CAO with class "component") performs a work order and issues an EASA Form 1 to certify maintenance on engines/components installed on (or temporarily removed from) a non-EU-registered aircraft while this aircraft undergoes line or base maintenance. The B/C-rated Part-145 (or CAO) organisation needs for this an approved MOE procedure to conduct maintenance away from an approved location.

Note: *In accordance with Regulation (EU) No 1321/2014, an appropriately approved organisation issuing an EASA Form 1 certifies that the requested maintenance has been properly accomplished on the component; but* ***this form does not provide permission for the installation of the component*** *on an EU-registered aircraft. Particular care is necessary for components originating from non-EU registered aircraft and intended for installation on EU-registered aircraft (ref. point 2.8 of AMC2 145.A.50(d)).*

Last updated:
22/05/2025

Link:
https://www.easa.europa.eu/en/faq/142008

My maintenance organisation (Part-145 rated B/C or a CAO with class "components") intends to 'overhaul' an engine or other component that is listed on its capability list. What conditions should be fulfilled in order to issue the EASA Form 1 with "Overhauled" Status/Work in block 11?

Answer

In case an appropriately rated approved maintenance organisation (AMO) intends to 'overhaul' a component (including engine), it should hold the applicable maintenance data for the particular component to be maintained (in the rest of this FAQ, "the maintenance data") and ensure the following:

1. If the overhaul process is defined in the maintenance data (e.g. in the CMM), the AMO must follow it in full. At the completion of the process, the AMO can then issue the EASA Form 1 with "overhauled" in Block 11, describing the maintenance actions carried out in Block 12.
2. If no overhaul process is defined in the maintenance data, there are two cases, both subject to the conditions that the maintenance data specifies tolerances and/or dimensional information against which the component can be evaluated and that the maintenance data contains repair solutions to address the potential defects/excessive wear of the components:
    1. If the component can be disassembled, the component maintenance can only be released with the entry "overhauled" when:
        - the component undergoes the full extent of the disassembly, cleaning, inspection, reassembly and testing tasks specified in the maintenance data; and
        - in case of detected defects, the component undergoes all associated repairs specified in the maintenance data.

2. If a disassembly cannot be accomplished without causing damage (i.e. single-piece component), the component maintenance can only be released with the entry “overhauled” when:
   - the component undergoes the full extent of the cleaning, inspection and testing tasks specified in the maintenance data;
   - and in case of detected defects, the component undergoes all associated repairs specified in the maintenance data.

In case 2), this means that if inspections and/or testing tasks conclude that the component contains a defect within acceptable tolerance specified in the maintenance data and this defect is not repaired, the maintenance should be released under ‘inspected/tested’.

In all cases, the AMO must clearly describe in Block 12 of the EASA Form 1 the maintenance actions performed to achieve the “overhauled” status, and the reference to the sections/chapter(s) of the maintenance data used.

Importantly, “Maintenance data” is defined in point M.A.401(b) of Annex I (Part-M) to Regulation (EU) No 1321/2014 and in the case of component intended for overhaul, has to be specific to component to be maintained: it can be either issued by the design approval holder of the design to which the component belongs or published by the manufacturer of the component if this data is acceptable to the design approval holder. If specific maintenance data exists for a given component (e.g. from the component manufacturer), such maintenance data cannot be replaced by maintenance data from a higher-level element (e.g. aircraft or engine to which the component belongs) for the purpose of overhauling the component.

For particular cases beyond the general scope of this FAQ, the maintenance organisation should seek agreement with its competent authority about the most appropriate entry for block 11.

For reference:

Paragraph 5, block 11 of Appendix II to Annex I (Part-M) of Regulation (EU) No 1321/2014

“Block 11 Status/Work

The following describes the permissible entries for block 11. Enter only one of these terms — where more than one may be applicable, use the one that most accurately describes the majority of the work performed and/or the status of the article.

1. *Overhauled means a process that ensures the item is in complete conformity with all the applicable service tolerances specified in the type certificate holder's, or equipment manufacturer's instructions for continued airworthiness, or in the data which is approved or accepted by the Authority. The item will be at least disassembled, cleaned, inspected, repaired as necessary, reassembled and tested in accordance with the above specified data ”*

M.A.401 Maintenance data

“[…] (b) […] applicable maintenance data is any of the following:

1. *any applicable requirement, procedure, standard or information issued by the competent authority or the Agency;*
2. *any applicable airworthiness directive;*
3. *the applicable instructions for continuing airworthiness and other maintenance instructions, issued by the type-certificate holder, […]*
4. *for components approved for installation […], the applicable maintenance instructions published by the component manufacturers and acceptable to the design approval holder […]*
5. *any applicable data issued in accordance with point 145.A.45(d).”*

Last updated:
08/05/2026

Link:
https://www.easa.europa.eu/en/faq/142042

Maintenance data

Shall the maintenance data be available and controlled at all times, even if there is no maintenance work going, or shall it be available only during the performance of maintenance?

Answer

Maintenance data has direct influence on many processes of the approved maintenance organisation (AMO) and contributes to demonstrate the overall capability of the organisation to perform maintenance.

The maintenance data either can be arranged directly by the AMO or provided by the customer/operator as specified by 145.A.45(a), M.A.609 or CAO.A.055(a). In both cases, the AMO should demonstrate that the maintenance data used, regardless of the source, is up-to-date. To discharge this responsibility, a procedure should be established to:

(a) control the amendment status of any documents being used;

and

(b) regularly check that all amendments are being received, e.g. by subscribing to a document amendment scheme (sufficient in case of direct access to the maintenance data through the DAH/OEM. The subscription to the maintenance data distribution system of the customer/operator is insufficient, additional independent verifications through the original author shall be done).

When the maintenance data is arranged directly by the AMO it shall be available and controlled continuously.

There are certain situations when the maintenance data can be obtained only through the customer/operator. One of the examples would be the maintenance data for the large aircraft. The maintenance data coming from the TC holder is usually customised because of the model/configuration/modification/order of aircraft, so it is normally not possible for the AMO to have this customised maintenance data directly from TC holder without having an aircraft of that type under the contract.

When the maintenance data is provided by the customer/operator, it shall be held and controlled by the AMO during maintenance on the concerned aircraft/component. Whenever the maintenance data is not available or not current, the maintenance shall not be performed and released.

Additionally, as part of the obligation for maintenance records, used maintenance data shall be:

- recorded (in compliance with 145.A.55(c), M.A.614(c) or CAO.A.090(b))
- Remark: Manuals issued by the (S)TC (Supplementary Type Certificate) holder such as AMM and CMM do not need to be stored as a record. Recording the revision status of such manual may be sufficient [AMC 145.A.55(c), AMC M.A.614(c)]; and
- accessible for auditing purpose

to demonstrate that the organisation worked in compliance with their respective requirements.

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/19104

Personnel requirements

Can a certification maintenance requirement (CMR) be performed by the Flight Crew before flight?

Answer

Normally the flight crew should not release CMR task unless that task is included in a “repetitive pre-flight airworthiness directive” under the conditions of 145.A.30(j)(3), M.A.606(h)(1) or CAO.A.040(c)(1)

In case of aircraft operated away from a supported location, the provisions of 145.A.30(j)(4), M.A.606(h)(2) or CAO.A.040(c)(2) could be used for CMRs as long as all the applicable conditions are met. In particular:

- sufficient practical training has been carried out.
- there is a procedure in the Maintenance Organisation Exposition, Maintenance Organisation Manual or Combined Airworthiness Exposition (CAE).

the task is considered “minor maintenance or a simple check” (AMC 145.A.30(j)(4) point 2(i) or AMC M.A.606(h)(2) point 2).

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02/02/2021

Link:
https://www.easa.europa.eu/en/faq/19105

What is the meaning of the Protected Rights in the Appendix IV to Part-145?

Answer

The protected rights mentioned in paragraph 2(a) of the Appendix IV to Part-145 were included in the Regulation 2042/2003 for the persons who were already working in a Part-145 organisation in a location situated outside the EU before the entry into force of Part-66. These protected rights allowed those persons to continue exercising (inside that particular Part-145 organisation) the privileges of the certification authorisation issued by that Part-145 organisation without the need to comply with paragraphs 1(c) to 1(f).

If this person changed the employment to a different Part-145 approved organisation after the entry into force of Part-66 (i.e. 28 November 2003), the previous certification authorisation is not valid and he/she needs to receive a new one from the new Part-145 approved organisation. In this case paragraph 2 of Appendix IV is not applicable anymore.

This implies that any new or extended authorisation granted by AMOs to their C/S after the entry into force of Part-66 must comply with paragraphs 1(c) to 1(f) in particular regarding the type training certificates.

Last updated:
23/01/2017

Link:
https://www.easa.europa.eu/en/faq/21913

What are the training requirements for personnel within a Part-145 organisation, other than those contained in Part-66?

Answer

Requirement	Reference
The accountable manager shall demonstrate a **basic understanding of Part-145.**	145.A.30(a) point 3.
The person or group of persons nominated responsible for ensuring that the organisation complies with Part-145 (including the Quality Manager) shall be able to demonstrate • **relevant knowledge, background and satisfactory experience related to aircraft or components maintenance as applicable,** • **a working knowledge of Part-145,**	145.A.30(b) point 3.
The organisation shall establish and control the competence of personnel involved in any maintenance, airworthiness review management and/or quality audits in accordance with a procedure and to a standard agreed by the competent authority. **In addition to the necessary expertise related to the job function, competence must include an understanding of the application of human factors and human performance issues appropriate to that person's function in the organisation.** **This should include also:** • **Fuel Tank Safety training (AMC3 145-A-30(e) and Appendix IV to AMC 145.A.30(e) and 145.B.10(3)).** • **EWIS training (AMC 20-22)**	145.A.30(e) and associated AMC/GM. Appendix IV to AMC 145.A.30(e) and 145.B.10(3). AMC 20-22.

The organisation shall ensure that personnel who carry out and/or control a continued airworthiness non-destructive test of aircraft structures and/or components are **appropriately qualified for the particular non-destructive test in accordance with the European or equivalent Standard recognised by the Agency.** Personnel who carry out any other specialised task shall be **appropriately qualified in accordance with officially recognised Standards.** By derogation to this paragraph those personnel specified in paragraphs (g) and (h)(1) and (h)(2), qualified in category B1, B3 or L in accordance with Annex III (Part-66) may carry out and/or control colour contrast dye penetrant tests.	145.A.30(f) and AMC 145.A.30(f).
By derogation to paragraphs (g) and (h), in relation to the obligation to comply with Annex III (Part-66), the organisation may use certifying staff qualified in accordance with the following provisions: 1. For organisation facilities located outside the Community territory certifying staff may be **qualified in accordance with the national aviation regulations of the State in which the organisation facility is registered subject to the conditions specified in Appendix IV to this Part.** 2. For line maintenance carried out at a line station of an organisation which is located outside the Community territory, the certifying staff may be **qualified in accordance with the national aviation regulations of the State in which the line station is based, subject to the conditions specified in Appendix IV to this Part.** 3. For a repetitive pre-flight airworthiness directive which specifically states that the flight crew may carry out such airworthiness directive, the organisation may issue a limited certification authorisation to the aircraft commander and/or the flight engineer on the basis of the flight crew licence held. However, the organisation shall ensure that **sufficient practical training has been carried out to ensure that such aircraft commander or flight engineer can accomplish the airworthiness directive to the required standard.** 4. In the case of aircraft operating away from a supported location the organisation may issue a limited certification authorisation to the commander and/or the flight engineer on the basis of the flight crew licence held subject to being satisfied that **sufficient practical training has been carried out to ensure that the commander or flight engineer can accomplish the specified task to the required standard.** The provisions of this paragraph shall be detailed in an exposition procedure. 5. In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff are available, the organisation contracted to provide maintenance support may issue a one-off certification authorisation: (i) to one of its employees **holding equivalent type authorisations on aircraft of similar technology, construction and systems;** or (ii) to any person with **not less than five years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification** provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person. All such cases as specified in this point shall be reported to the competent authority within seven days of the issuance of such certification authorisation. The organisation issuing the one-off authorisation shall ensure that any such maintenance that could affect flight safety is re-checked by an appropriately approved organisation.	145.A.30(j) and associated AMC/GM. Appendix IV to Part-145.
In addition to the appropriate requirements of 145.A.30(g) and (h), the organisation shall ensure that certifying staff and support staff have an **adequate understanding of the relevant aircraft and/or components, or both, to be maintained and of the associated organisation procedures.** In the case of certifying staff, this shall be accomplished before the issue or reissue of the certification authorisation.	145.A.35(a) and AMC 145.A.35(a).
The organisation shall ensure that all certifying staff and support staff are involved in at least **six months of actual relevant aircraft or component maintenance experience in any consecutive two-year period.**	145.A.35(c) and AMC 145.A.35(c).

The organisation shall ensure that all certifying staff and support staff receive **sufficient continuation training in each two-year period to ensure that such staff have up-to-date knowledge of relevant technology, organisation procedures and human factor issues.**	145.A.35(d) and AMC 145.A.35(d).
The organisation shall establish **a programme for continuation training** for certifying staff and support staff, including a procedure to ensure compliance with the relevant paragraphs of 145.A.35 as the basis for issuing certification authorisations under this Part to certifying staff, and a procedure to ensure compliance with Annex III (Part 66).	145.A.35(e) and AMC 145.A.35(e).
Except where any of the unforeseen cases of 145.A.30(j)(5) apply, the organisation shall **assess all prospective certifying staff for their competence, qualification and capability to carry out their intended certifying duties** in accordance with a procedure as specified in the exposition prior to the issue or reissue of a certification authorisation under this Part.	145.A.35(f) and AMC 145.A.35(f).
The holder of a category A aircraft maintenance licence may only exercise certification privileges on a specific aircraft type following the satisfactory completion of the **relevant category A aircraft task training** carried out by an organisation appropriately approved in accordance with Annex II (Part-145) or Annex IV (Part-147). **This training shall include practical hands on training and theoretical training as appropriate for each task authorised.** Satisfactory completion of training shall be demonstrated by an examination or by workplace assessment carried out by the organisation.	145.A.35(n) and AMC 145.A.35(n).
The holder of a category B2 aircraft maintenance licence may only exercise the certification privileges described in point 66.A.20(a)(3)(ii) of Annex III (Part-66) following the satisfactory completion of (i) the **relevant category A aircraft task training** and (ii) **six months of documented practical experience covering the scope of the authorisation that will be issued**. **The task training shall include practical hands on training and theoretical training as appropriate for each task authorised.** Satisfactory completion of training shall be demonstrated by an examination or by workplace assessment. Task training and examination/assessment shall be carried out by the maintenance organisation issuing the certifying staff authorisation. The practical experience shall be also obtained within such maintenance organisation.	145.A.35(o) and AMC 145.A.35(o).
Pre-flight inspections (when the 145 organisation has an agreement with an operator) It should be demonstrated that the personnel carrying out pre-flight inspections have received **appropriate training for the relevant pre-flight inspection tasks based on the operator's CAME.**	ML.A.301(a) or M.A.301(a) and AMC M.A.301(a)

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/19100

Part-66

Get a Part-66 licence

What are the Part-66 licence categories?

Answer

In a Part-145 approved organisation, the different categories of Part-66 licences are:

LICENCE CATEGORY	For certifying the release to service of work performed on aircraft:	What:

LICENCE CATEGORY	For certifying the release to service of work performed on aircraft:	What:
A	Minor scheduled line maintenance and simple defect rectification Divided into the following subcategories: • A1 Aeroplanes Turbine; • A2 Aeroplanes Piston; • A3 Helicopters Turbine; • A4 Helicopters Piston.	Line Maintenance
B1	Maintenance on aircraft structure, power plant and mechanical and electrical systems, avionic systems requiring simple tests to prove their serviceability and no troubleshooting Divided into B1.1 for turbine aeroplanes, B1.2 for piston engine aeroplanes, B1.3 for Turbine helicopter and B1.4 for piston engine helicopter	Line Maintenance
B3	Maintenance on aeroplane structure, power plant and mechanical and electrical systems; and on avionics systems requiring only simple tests to prove their serviceability and not requiring troubleshooting limited to non-pressurized aeroplanes of 2 000 kg MTOM and below.	Line Maintenance
B2	Maintenance performed on avionic and electrical systems and electric and avionics tasks within powerplant and mechanical systems requiring only simple test and minor scheduled line maintenance and simple defect rectification	Line Maintenance
B2L	The same as B2 but limited to the systems endorsed on the licence: Divided into the following ‘system ratings’: communication/navigation (com/nav), instruments, auto flight, surveillance, airframe systems.	Line Maintenance
L	Maintenance on aircraft structure, power plant and mechanical and electrical systems; radio, Emergency Locator Transmitters (ELT) and transponder systems; and work on other avionics systems requiring simple tests to prove their serviceability Divided into the following subcategories: L1C: composite sailplanes, L1: sailplanes, L2C: composite powered sailplanes and composite ELA1 aeroplanes, L2: powered sailplanes and ELA1 aeroplanes, L3H: hot-air balloons, L3G: gas balloons, L4H: hot-air airships, L4G: ELA2 gas airships, L5: gas airships other than ELA2.	Line Maintenance
C	Base maintenance C with respect to complex motor-powered aircraft and C with respect to other than complex motor-powered aircraft	Line Maintenance

LICENCE CATEGORY	For certifying the release to service of work performed on aircraft:	What:
	Support staff for:	
B1	Maintenance on aircraft structure, power plant and mechanical and electrical systems, avionic systems requiring simple tests to prove their serviceability and no troubleshooting (subdivided into B1.1 for turbine aeroplanes, B1.2 for piston engine aeroplanes, B1.3 for Turbine helicopter and B1.4 for piston engine helicopter)	Base Maintenance
B2	Maintenance on avionic and electrical systems and electric and avionics tasks within power plant and mechanical systems requiring only simple test and minor scheduled line maintenance and simple defect rectification	Base Maintenance
B2L	The same as B2 but limited to the systems endorsed on the licence: • communication/navigation (com/nav), • instruments, • auto flight, • surveillance, • airframe systems.	
B3	Maintenance on aeroplane structure, power plant and mechanical and electrical systems; and on avionics systems requiring only simple tests to prove their serviceability and not requiring troubleshooting limited to non-pressurized aeroplanes of 2 000 kg MTOM and below.	Base Maintenance
L	Maintenance on aircraft structure, power plant and mechanical and electrical systems; radio, Emergency Locator Transmitters (ELT) and transponder systems; and work on other avionics systems requiring simple tests to prove their serviceability Divided into the following subcategories: L1C: composite sailplanes, L1: sailplanes, L2C: composite powered sailplanes and composite ELA1 aeroplanes, L2: powered sailplanes and ELA1 aeroplanes, L3H: hot-air balloons, L3G: gas balloons, L4H: hot-air airships, L4G: ELA2 gas airships, L5: gas airships other than ELA2.	Base Maintenance

See points 66.A.3 and 66.A.20 of Annex III (Part-66) to Regulation (EU) No 1321/2014 can be found on the Agency website https://www.easa.europa.eu/regulations#regulations-continuing-airworthi… or in the eRules https://www.easa.europa.eu/document-library/easy-access-rules/easy-acce…)

Last updated:

28/01/2021

Link:

https://www.easa.europa.eu/en/faq/19017

How to get an EASA Part-66 Licence (Category B1 or B2)?

Answer

1. In order to get an EASA Part-66 AML (Aircraft Maintenance License), an applicant needs:
   i. Basic knowledge (66.A.25);
   ii. Basic experience (66.A.30).

2. In order to get an aircraft type rating TR endorsed in the AML, an applicant needs:
    i. Type Training (Theoretical and Practical) (66.A.45)
    ii. On-the-job Training (OJT) for the first TR (66.A.45).

The following two schemes depict the most common paths and are for information only.

- The first scheme applies to Group 1 aircraft (B1 and B2 licence categories).
- The second scheme applies to other than Group 1 aircraft (B1 and B2 licence categories).

NOTE: Aircraft groups are described in 66.A.5.

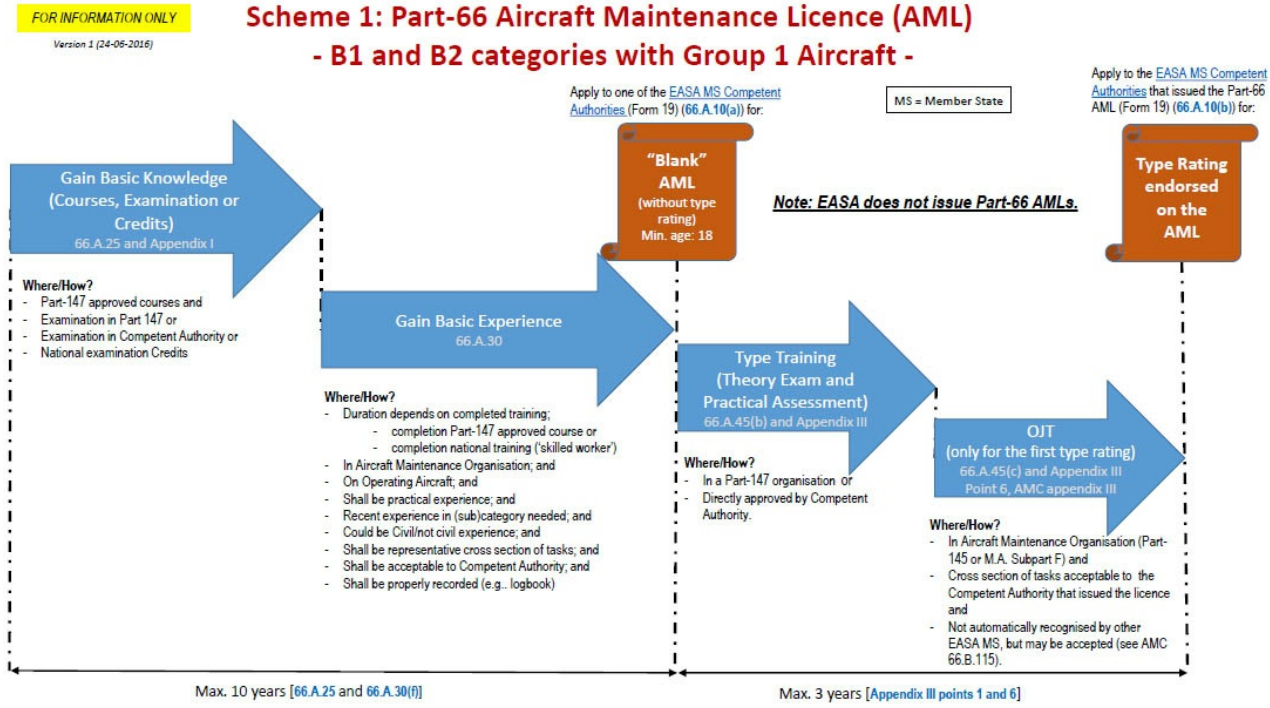
These schemes do not override Part-66 requirements nor capture all the possibilities (various licences, educations and experiences). The start and end of each phase can vary depending on individual cases.

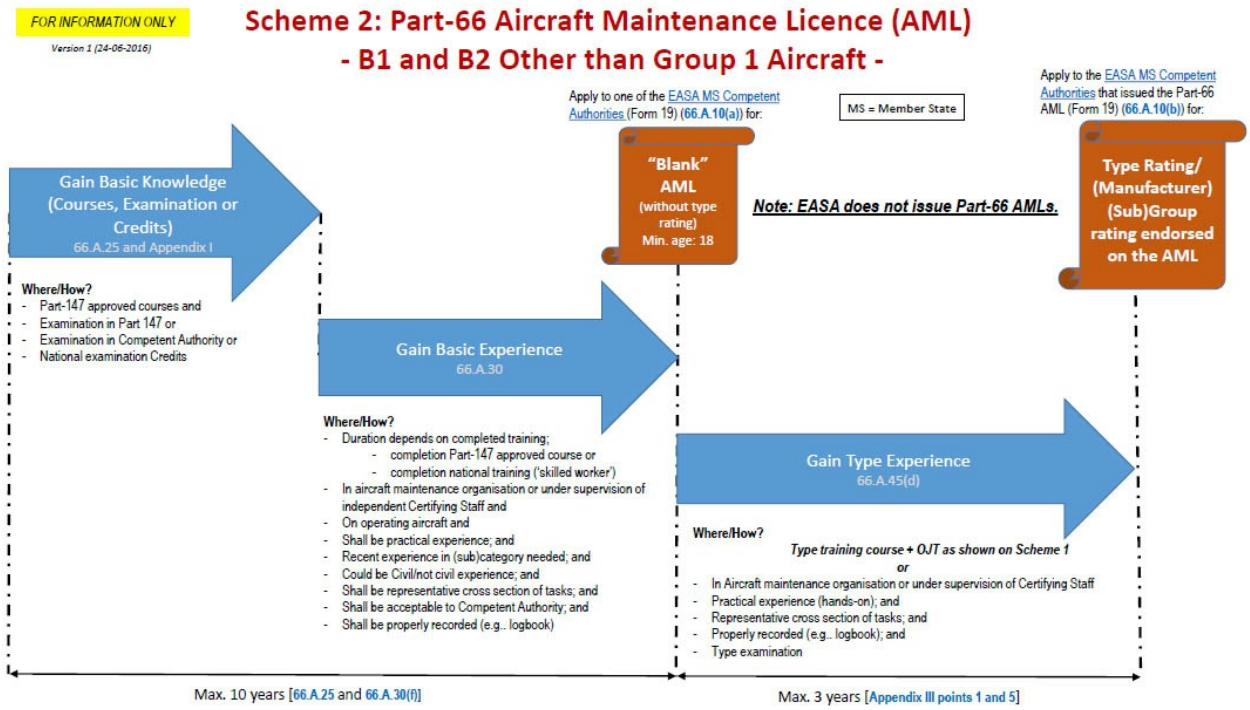
For further and detailed information:

- Refer to Part-66 and related AMC/GM; and
- Consult the Competent Authority where you intend to apply for the AML.

NOTE:
An AML issued by a country other than EASA Member States cannot be rendered valid as EASA Part-66 AML.

NOTE:
Part-66 licences issued by the countries other than EASA Member States are not mutually recognised in the European system.





Click on the pictures to zoom in.

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/21067

How can I apply for an EASA Part-66 licence? What is required at the time of the application?

Answer

The initial application for a Part-66 aircraft maintenance licence shall be made to the competent authority of one of the Member States (MS). Please contact this competent authority for an application Form (EASA Form 19) and specific details concerning the application.

The EASA Form 19 shall be submitted to the MS together with evidence of compliance with the requirements. MS will specify the related fees and how compliance with the requirements shall be demonstrated.

See 66.A.10, 66.A.15, 66.A.25, 66.A.30, 66.A.45 and 66.A.70 and related AMC/GM.

An application for amendment or renewal of a Part-66 aircraft maintenance licence (AML) shall be made to the competent authority of the MS who issued the licence. Please contact this competent authority for an application Form (EASA Form 19) and specific details concerning the application.

The EASA Form 19 shall be submitted to the MS together with evidence of compliance with the requirements. MS will specify the related fees and how compliance with the requirements shall be demonstrated.

See 66.A.10, 66.A.15, 66.A.25, 66.A.30, 66.A.40, 66.A.45, 66.A.50, and 66.A.70 and related AMC/GM.

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19083

Who is allowed to issue EASA Part-66 licences? Can I apply for a Part-66 licence to EASA?

Answer

EASA is not a licensing authority and therefore does not issue any licences. Part-66 licences are issued by the competent authorities of the EU Member States, plus Switzerland, Norway, Iceland and Liechtenstein. The list of the National Aviation Authorities and their contact details can be accessed here: https://www.easa.europa.eu/the-agency/member-states .

Last updated:
13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19082

I want to work in an organisation located within the EU. Do I need a Part-66 licence?

Answer

According to the current rules, a Part-66 licence is required for:

- certifying the release to service of maintenance of an aircraft;
- work in maintenance organisations as support staff.

For other activities within a maintenance organisation, a Part-66 licence is not required. No Part-66 licence exists for components (based on article 5 of Commission Regulation (EU) No. 2018/1142).

Remark: Privileges on the basis of national requirements may be added in the Part-66 licence in section XIV. national privileges.

Last updated:
14/09/2018

Link:
https://www.easa.europa.eu/en/faq/19014

I am a colour-blind. Does this prevent me from getting a Part-66 licence or exercising my licence privileges?

Answer

Regulation (EU) 1321/2014 does not require any medical examination before applying for a Part-66 licence.

In the past some medical criteria were proposed in JAR-66, but these were removed in order to avoid conflicts with national rules. JAR 66.A.50 had requirements on:

- use of alcohol at work,
- effects of medicines,
- physical conditions, vision, ability to see colours,
- mental conditions.

Part-66 has only a provision to suspend, limit or revoke licences in case of carrying out maintenance or issuing a certificate of release to service when adversely affected by alcohol or drugs [66.B.500 point(7)].

Current 145.A.30(e) requests certifying staff to receive a human factor training and GM 1 145.A.30 (e) gives guidance about the elements of the training to be imparted:

4 - Human performance & limitations
4.1 Vision
4.2 Hearing
4.3 Information-processing
4.4 Attention and perception
4.5 Situational awareness
4.6 Memory
4.7 Claustrophobia and physical access

4.8 Motivation

4.9 Fitness/Health

4.10 Stress

4.11 Workload management

4.12 Fatigue

4.13 Alcohol, medication, drugs

4.14 Physical work

4.15 Repetitive tasks / complacency

Common sense recommends the certifying staff not to exercise the privileges of their certification authorisation if they know or suspect that their physical or mental condition renders them unfit to exercise such privileges (impact to the safe maintenance operations). In addition such recommendation may be covered and rendered mandatory by the national requirements of the Member State where you exercise your privileges. Typical examples are for intoxication (alcohol, drugs, etc.).

It is therefore recommended that you inform the management of your maintenance organisation:

- as you should not deviate from the national law;
- as the organisation shall establish and control the competence of personnel; (145.A.30(e) – necessary expertise related to the job function);
- as the organisation shall have a human performance programme in place (145.A.35(e)); and
- as the ICAO safety management system encourages to identify hazards and risks.

Please find an agreement with your company in order to list the maintenance tasks that you are allowed to carry out without jeopardising the aircraft safety.

Note: The same reasoning as explained above applies for any medical condition.

Last updated:

14/09/2018

Link:

https://www.easa.europa.eu/en/faq/19089

Does EASA plan to propose changes to the implementing regulation to establish specific adaptations applicable to persons with learning difficulties (e.g. dyslexia, attention deficit disorder, hyperactivity,…) who wish to undertake aircraft maintenance training in a Part-147 approved training organisation as required to apply for Part-66 licenses?

Answer

Anybody able to pass the basic knowledge examinations and fulfil the basic experience requirements can get the related Part-66 licence. There are no additional conditions such as a medical certificate or any other proof regarding the mental or physical abilities. In other words, people with specific learning difficulties or physical impairments are not discriminated by Part-66 or Part-147.

Obtaining the licence does not give the certification privileges. Before granting such privileges, the maintenance organisation will have first to check the competence, including the assessment of the skills and abilities and considering the Human Factors principles. The scope of the certification authorisation will be commensurate to these competence/abilities. Please note that in some EU Member States additional occupational safety and health requirements may apply (working on heights, confined spaces, etc.).

EASA does not plan to propose amendments to the regulations to account for cases of people with special needs during examinations: a single regulation cannot cover all individual cases. If a Member State intends to introduce any such adaptation, Regulation EU 2018/1139 (the BR) includes the possibility for the Member States to grant an exemption under the Article 71(2), after evaluation of the individual conditions for the case.

As an additional information, the Agency already issued several positive recommendations for such exemptions (e.g. for candidates with confirmed dyslexia, i.e. 25% additional time). Please contact your competent authority for details.

For further information about the flexibility provisions under the BR, please see 'Safeguard & Flexibility Provisions'.

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19090

How can I get a Part-66 licence valid in the EU by conversion?

Answer

Either you are the holder of:

- a national licence [66.A.305] or an approved maintenance organisation authorisation [66.A.310], that was valid in the Member State before the entry into force of the EASA regulation introducing the relevant Part-66 categories (see entry into force of the amendments of the regulation), or
- JAR-66 licence, which will automatically be re-issued as Part-66 licences as they are deemed to have been issued in accordance with Part-66. This does only apply to JAR-66 licence issued by the countries listed on the Mutual recognition page.

Please note that none of the bilateral agreements between the EU and third countries (at present US, Canada, Brazil and China and Japan) have the maintenance licences in their scope.

Furthermore, 66.A.70 allows conversion of qualifications valid in a Member State in very specific and limited cases.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19019

Basic Part-66 licence (without type rating)

For personnel studying a qualification at a University or a degree in a country outside of the EU: I am studying aeronautics and I wish to obtain an EASA Part-66 licence? May I get a credit or may I get a licence based on my degree?

Answer

No, unless the basic knowledge got outside of the EU is acquired in a Part-147 training organisation approved by EASA, according to 66.B.405.

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28/11/2013

Link:
https://www.easa.europa.eu/en/faq/19018

Which documentation is required to support the application demonstrating compliance with the experience requirements?

Answer

Maintenance experience should be written up in a manner that the reader has a reasonable understanding of where, when and what maintenance constitutes the experience. A task-by-task account is not necessary, but at the same time a bland statement such as “X years maintenance experience completed” would not be acceptable. A maintenance log book detailing the experience is desirable and some competent authorities may require such a log book (see AMC 66.A.10).

Consequently, the format used to evidence the maintenance experience is not strictly defined in the rules and is left at the discretion of the competent authority issuing the licence. Hence, EASA advises you follow the instructions of the competent authority where you intend to apply for.

Last updated:
13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19084

Where do I gain the required basic maintenance experience? Is it mandatory to gain the required maintenance experience in an EASA approved Part-145 organisation?

Answer

According to point 66.A.30(e), experience in aircraft maintenance gained in organisations not approved in accordance with Part-145 or Part-CAO – for example in the following environments: FAR-145, armed forces, coast guard, police, nationally approved organisations, organisations approved by non-EASA Member States, or in aircraft manufacturing, etc. - may be recognised to achieve the experience required in 66.A.30(a), when such maintenance is equivalent to that required by Part-66 as established by the competent authority.

However, **at least part of the basic experience shall be gained in an EASA-approved Part-145 or Part-CAO organisation** (or under the supervision of independent certifying staff): the AMC to point 66.A.30(e) states that as a minimum, experience in aircraft maintenance organisation(s) that is (are) approved in accordance with Part-145 or Part-CAO should be:

(1) for categories A and L: 6 months;

(2) for categories B1, B2, B2L, B3 and C: 12 months.

Consequently, please contact the competent authority where you intend to apply for a licence, in order to check whether the basic experience you have is equivalent to that required by Part-66, with detailed information on the type of aircraft, its operation and the nature of the work and respect, as a minimum, the periods set in this AMC for the experience gained in Part-145 and/or Part-CAO organisations.

Last updated:
22/05/2025

Link:
https://www.easa.europa.eu/en/faq/19085

I work as a mechanic in the military field on aircraft being also certified for civil operations. In order to obtain the Part-66 licence, why do I need additional experience of civil aircraft maintenance as required by 66.A.30(e) on top of my experience in the military field?

Answer

As stated in 66.A.30(e), for mechanics having a military background and seeking a Part-66 licence, the objective is to ensure adequate understanding of the civil aircraft maintenance environment, not only because of possible different aircraft technologies, but also because of practices linked to the civil environment.

Not only the technology or systems of the civil aircraft might differ from the military aircraft version configuration (e.g. no video entertainment system; no sliding chutes; different fuel or electrical systems) but the experience gained in the military environment might also significantly differ from the scope of work of the civil maintenance organisation, its procedures and policies (e.g. use and meaning of the certificate of release to service - EASA Form 1, standard parts, store and tools procedures, use of the maintenance documentation such as ADs, SB, SIL…, quality and safety management system; human factor aspects, continuing airworthiness record systems…).

In addition the interaction with the customers (i.e. the airliners) induces new practices such as use of the aircraft technical log book, MEL, aircraft defect rectification and deferment of items; use of customer documentation (e.g. MPD, MRB, SRM, IPC); interaction with the crew; how to behave with the passengers; special procedure such as (re)fuelling, de-icing /anti-icing; communication with the tower or moving on the apron.

Finally, the requirements for the continuing airworthiness of the aircraft might significantly evolve in the civil environment. To

name a few, the following items can be reminded: ADs, SBs, operational directives, EASA requirements; records and archives; repairs and modifications (use of data, EASA/FAA rules; dual-release); special inspections (e.g. CPCP, EWIS); approved maintenance programme and its effectiveness / reliability; occurrence reporting; understanding of MSG-3 methods …

The military regulations widely differ from country to country, with certain countries having military rules similar to the EU ones, while others have very different rules. The 12-month additional civil maintenance experience average (as per AMC 66.A.30(e)), has been agreed by the Member States and accepted as a standard way to demonstrate compliance with the rule to achieve mutual recognition and adequate degree of standardisation.

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13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19086

I have completed my EASA Part-66 modules for B1 and I have passed all the exams, but I still lack experience to get my licence. Is there a time limit to get the licence ? Will the certificate expire in a few years if I do not get the experience?

Answer

According to Commission Regulation (EU) No 1149/2011 of 21 October 2011 (amending Regulation (EC) No 2042/2003), the basic examinations shall be passed and experience shall be acquired within the ten years preceding the application for an aircraft basic licence.
The new regulation also states that for the purpose of time limits related to basic knowledge examinations, basic experience acquired before the Regulation applies, the origin of time shall be the date by which this Regulation applies, which is 01/08/2012 (which means until 31/07/2022).

Last updated:
28/11/2013

Link:
https://www.easa.europa.eu/en/faq/19021

Categories of a Part-66 licence

I hold a Category A1 Part-66 licence. What are the requirements to extend my licence to Category B1.1?

Answer

The requirements to extend a Part-66 licence with a category A1 to B1.1 are:

- the knowledge demonstration of those basic modules, which are of higher level for B1.1 (see Part-66 Appendix I); and
- the demonstration of experience required by Appendix IV to Part-66:

Two years of practical maintenance experience on operating aircraft in the B1.1 category (not in the A1 category) is needed before applying for the extension. This experience need to be accumulated within the 10 years preceding the application.

The experience requirement will be reduced by 50% if the applicant has completed an approved Part-147 course relevant to the category extension according to Appendix IV of Part-66.

See 66.A.10, 66.A.25, 66.A.30 and related AMC/GM.

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19088

I already hold a Part-66 licence and I would like to include an additional basic (sub)category? Which additional

(sub)modules are required to be passed for the addition of that new (sub)category?

Answer

According to 66.B.100(b), the competent authority shall verify that all required modules of Appendix I or Appendix VII to Part-66 related to that new (sub)category sought are met. Credit can be granted as regards to the basic knowledge of the (sub)category for which the licence has been already issued.

This means that a comparison of the basic knowledge (gap analysis) will have to be done between the different (sub)categories. Such a comparison has not been yet done once and for all in Commission Regulation (EU) No 1321/2014 due to the different potential cases (wide diversity of (sub)categories).

Therefore, such a comparison should be done by the Member State that has already issued the Part-66 licence before the applicant is enrolled in such a “gap” basic knowledge course.

Please contact your competent authority, which may have already performed this comparison. Some competent authorities may have already posted such comparison(s) on their websites; however, to be sure that the comparison relevant to your case is acceptable to the competent authority who issued your licence.

In addition, the applicant will have to comply with the additional experience requirements for the new (sub)category sought, as detailed in Appendix IV to Part-66.

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19093

Type ratings of a Part-66 licence

What is a difference between examination and assessment? Why are there two different examination standards, respectively in Part-66 Appendix III, points 4 and 5?

Answer

Examination is a written form of demonstration of a certain level of theoretical knowledge by the student based on achievement of the learning objectives, usually performed on completion of a theoretical training course or a portion of a course. The student shall demonstrate, to the levels identified in the table in Appendix III, the detailed theoretical knowledge of the aircraft’s applicable systems, structure, operations, maintenance, repair, and troubleshooting according to approved maintenance data, as well as the use of manuals and approved procedures, including the knowledge of relevant inspections and limitations. The standard, format, pass mark, etc. are defined in Appendix III, 4.1. The examination shall be performed by the appropriately trained and approved examiner.

Assessment is a practical form of measuring the competence of the student by evaluating three major factors associated to the learning objectives: knowledge, skills and attitude, usually performed on completion of a practical training course. The assessment should focus on the competencies relevant to the aircraft type and its maintenance. The principles on how to perform the competence assessments are given in the AMCs to Part-66, Appendix III. The assessment shall be performed by appropriately trained and approved assessors.

Regarding Part-66 Appendix III, point 5., “Type Examination Standard” does not apply to the examination performed as part of type training. This point only applies to those cases where type examination is performed as a substitute for type training, which means it is intended for the examinations conducted by (or on behalf of) the national competent authority on those aircraft that do not require a type training (typically Group 2, Group 3 and Group 4 aircraft according to Appendix I to the AMCs to Part-66). So, it is true that the examiners authorised by the national competent authority shall not have been involved in the applicant's training. In all other cases AMC to Part-66 Appendix III applies, which means that the roles of the assessor and the instructor may be combined for the practical elements, depending on the size of the organisation.

Regarding the roles of examiners and assessors, these are different functions (which does not prevent that one person can’t be

authorised both as examiner and assessor). Normally, these functions should not be confused. The expression “The examination shall be oral, written or practical assessment based, or a combination thereof, …” applies only for Section 5, i.e. “Type Examination Standard”.

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19094

I have attended a type training, may I immediately ask my authority to endorse it on my licence?

Answer

Yes, if the following conditions are met for the theoretical + practical parts of type training:

- the course has been attended and the exams passed in a Part-147 approved training organisation,
- or in another organisation, provided the course has been directly approved by the authority who issued the licence as per 66.B.130,
- and for B1, B2 and L5 licences, in case where the aircraft type is the first in a licence category or subcategory, an OJT training has been performed (derogation for Group 2 and 3 aircraft see 66.A.45(d)).

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28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19029

I hold a licence with a type rating and I wish to add the rating of a similar aircraft of the same manufacturer. For example: I have a type rating on Airbus A320 Series, and I wish to add the rating on A330 Series. Do I need a complete course?

Answer

If aircraft types of the same manufacturer have different type ratings as stated in Appendix I to AMC to Part-66, there is a gap of knowledge gap preventing the endorsement of the second aircraft type. E.g. the Airbus A330 (GE CF6) is a different rating to the Airbus A318/A319/A320/A321 (CFM56).

If the Airbus A318/A319/A320/A321 (CFM56) is previously endorsed or the criteria for endorsement are met (based on conversion or type training) the Airbus A330 (GE CF6) can be endorsed (within the time limits) following either

- a complete theoretical + practical Airbus A330 (GE CF6) course, or
- a differences training course, theoretical and practical for Airbus A330 (GE CF6) compared to Airbus A318 (CFM56) (and/or A319/A320/A321) as described in Appendix III point 1(c).

Those training courses may either be provided by a Part-147 training organisation or by the competent authority.

Remark: A Part-147 organisation difference training is not required for variants within the same aircraft type rating, for example: from A320 to A321. Nevertheless, some training to cover the differences may be necessary. This may be provided by an approved maintenance organisation, before issuing the certifying staff authorisation, (see AMC to Paragraph 1(c) of Appendix III to Part-66 ‘Aircraft Type Training and Examination Standard. On-the-Job Training’).

Last updated:
14/09/2018

Link:
https://www.easa.europa.eu/en/faq/19030

I just got an empty Part-66 licence. I plan now to get type ratings. Are 2 weeks practical training sufficient?

Answer

As per the new Regulation (EC) No. 1149/2011, the practical element of training is no longer a question of time. The duration of the practical training should be adequate in order to complete the contents required by paragraph 3.2 of Appendix III to Part-66.

For aeroplanes with a MTOM equal or above 30.000 kg the duration for the practical element of a type rating training course should not be less than two weeks.

In addition, for B1 and B2 licences, where the aircraft is the first in a licence category or subcategory, an on the job(OJT) training shall be performed.

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14/09/2018

Link:
https://www.easa.europa.eu/en/faq/19031

The Appendix III of Part-66 states that a type training course shall be started and finished within 3 years before the application for a type rating, is this still valid if I started the course before 1 August 2012?

Answer

Type training courses started and finished before 01 Aug 2012 can be used for rating endorsement application until 31 July 2015.

Any theoretical type training course finished after 01 Aug 2012 can be used for rating endorsement application until 3 years after they were started (even in the case where they were started before 01 Aug 2012).

Any practical type training course finished after 01 Aug 2012 can be used for rating endorsement application until 3 years after they were started (even in the case where they were started before 01 Aug 2012).

Last updated:
13/11/2014

Link:
https://www.easa.europa.eu/en/faq/19032

Is it mandatory to go to a Part-147 approved training organisation to get type training? Can we do this training in a Part-145 approved organisation or at the aircraft manufacturer?

Answer

Only approved Part-147 organisations are entitled to conduct type training courses in accordance with Article 6 of the Commission Regulation (EU) No 1321/2014. However, according to Appendix III to Part-66, other than Part-147 organisation (including Part-145 maintenance organisations and manufacturers) can be approved by their competent authorities to provide theoretical element (theoretical training and examination) and/or practical element (practical training and assessment) of aircraft type training. This so called “direct” approval may be given by the competent authority in accordance with 66.B.130 provided:

- This is a one-time approval on a case-by-case basis for a single course or a predefined group of courses i.e. Part-145 approved maintenance organisation cannot receive a permanent approval for aircraft type training.
- The course and the assessment comply with the same standard valid for approved Part-147 organisations; this standard is described in paragraph 1 to 4 of Appendix III to Part-66.
- No Part-147 Certificate of Recognition can be issued for the purpose of the mutual recognition between Member States. However, an appropriate training certificates can be issued after successful completion of both elements.

Directly approved aircraft type training course is only valid for Part-66 AML type rating endorsement by that Member State, which means it cannot be used for aircraft type endorsement by other Member States (no mutual recognition of the certificate), unless this other competent authority has approved the course as well.

In the case of type training for airships in Group 1, the courses shall be directly approved by the competent authority in all cases. The competent authority shall have a procedure to ensure that the syllabus of the airship-type training covers all the elements

contained in the maintenance data from the Design Approval Holder (DAH) (66.B.130(b)).

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19087

I have passed the aircraft type rating training (TRT) in an approved EASA Part-147 organisation, although I have not completed the basic knowledge training. Is this TRT valid for life? Would it be possible to endorse it on my Part-66 licence as soon as I get one?

Answer

Aircraft type rating training must have been started and be completed within the 3 years preceding the application for a type rating endorsement (Part-66, Appendix III, paragraph 1).

It does not make sense to attend in the first instance a TRT course with the intent of getting this TRT later endorsed on the maintenance licence for two main reasons:

- At the time the TRT is gained, the holder has no licence and it may take more than 3 years before the applicant is compliant with the basic knowledge (66.A.25), as well as the experience requirements (66.A.30). Therefore the applicant runs the risk to get its TRT certificate expired at the time he applies for the licence and the TRT endorsement; and
- From an intellectual point of view, it is not logical to demonstrate maintenance competence on a specific aircraft type without having acquired the basic knowledge, skills and attitude related to the maintenance and the technologies used in aviation, in general.

Legally speaking the situation is not forbidden. However be sure that you get your licence within the three-year timeframe from the date you **started** the TRT course [see Part-66 Appendix III 1.(a)(iv) and (b)(v)].

Last updated:
08/09/2021

Link:
https://www.easa.europa.eu/en/faq/19092

OJT (On the Job Training) for a Part-66 licence

Tasks listed in Appendix II of Part-66 for an OJT are not suited to large aircraft. Shall we select the OJT tasks only from this list?

Answer

Not only, because it is required that:

- the tasks for an OJT must be representative of the aircraft: this means that the tasks listed in Appendix II which are representative of the aircraft or another model in the type rating should be kept and those not representative be disregarded,
- some tasks should be selected from each paragraph of the Appendix II list: this means that it is not necessary to perform exactly 50% in each ATA chapter,
- new tasks more representative of the type of aircraft may be added by the maintenance organisation,
- the OJT tasks should be selected because of their frequency, safety, novelty: tasks selected among those frequently carried out by the organisation on this type or more related to safety should be deleted.

Note: See AMC to Section 6 of Appendix III to Part-66 point 4 and 5

Last updated:
28/01/2021

Link:

https://www.easa.europa.eu/en/faq/19034

How tasks for OJT shall be selected for different licences?

Answer

The AMC states that the tasks are representative of the licence (sub)category applied for. This means that:

- the tasks should identify whether they relate to a B1.1, B1.3 licence …, to a B2 or L5,
- and be adapted to the privilege of each licence category / subcategory as defined in 66.A.20(a):
  - for a B1 licence: aircraft structure, power plant and mechanical and electrical systems + work on avionics system with simple test but not including trouble shooting;
  - and those related to a B2: avionics, aircraft electrical system tasks and avionics/electrical tasks within mechanical and power plant systems; or
  - and those related to a L5: aircraft structure, power plant, mechanical and electrical systems, radio, Emergency Locator Transmitters (ELT), transponder systems and other avionics systems requiring simple tests to prove their serviceability.

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28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19035

Since the OJT is intended for the first aircraft type endorsement within a given licence (sub)category, does this mean that it can be performed on different aircraft types typical for that (sub)category?

Answer

OJT shall be performed on the aircraft type for which the applicant is seeking type endorsement. The objective of the OJT is to gain the required competence and experience in performing safe maintenance **on that particular aircraft type**.

However, a certain number of tasks may be performed on other aircraft type(s) (typically from the same manufacturer), only in the cases where such tasks are very similar to the tasks applicable to the aircraft type for which the candidate seeks the type endorsement. The AMC to section 6. of Appendix III to Part-66 states: *"Tasks should be selected among those applicable to type of aircraft and licence (sub)category applied for."* Tasks applicable to the aircraft type may be found also on other aircraft types, perhaps not many, but some may fulfil the requirement. A good example would be same engine types installed on different aircraft types (i.e. CFM56 installed on A320 Family and B737). The location of LRUs, oil servicing, IDG, generator, filter change, engine standard practices, etc., those tasks often do not depend on the specific aircraft type (even could be performed off-wing or on spare engine), except the tasks belonging to the airframe - engine interface. The similar can also be applied for the same type of APU installed on different aircraft types or a limited number of other components/systems. Consequently, this may be acceptable, if properly justified to the competent authority within the MOE Chapter 3.15. **This flexibility provision is applicable for a limited number of tasks and should not be used to conduct the entire OJT on other aircraft type(s) showing similarities.**

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/19097

How can I carry out my OJT in a Part-145 approved maintenance organisation (AMO) whose principal place of business is located outside the EASA Member States?

Answer

The endorsement of the first aircraft type rating, within a given category/sub-category, requires satisfactory completion of the

corresponding On-the-Job-Training (ref. 66.A.45(c)).

The OJT **shall be approved by the competent authority who has issued the licence**(ref. Part 66, Appendix III, sec. 6).

It shall be carried out in a maintenance organisation approved under Part-145 with A rating or and the procedures for OJT should be included in the exposition (MOE chapter 3.15 “OJT procedure”, approved by the competent authority of the maintenance organisation. However, since these procedures are approved by the competent authority of the maintenance organisation, and providing training is not one of the privileges of a maintenance organisation, they can only be used when the licensing authority (competent authority issuing the license) is the same as the competent authority of the maintenance organisation. In other cases, it is up to the licensing authority to decide whether it accepts such procedures for the purpose of approving the OJT (ref. AMC to Section 6 of Appendix III to Part-66).

For the Part-145, whose principal place of business is located outside the EASA Member states, the competent authority of the maintenance organisation is EASA. In such case, the OJT procedures cannot be included in the MOE, due to the fact that EASA is not a licensing authority.

The possibility still exists in this case that a licensing authority may directly approve OJT procedures, which have to be included in a separate document outside (and not being part) of the MOE.

Consequently, personnel working in these AMOs, or the AMOs wishing to support its staff on this matter, should:

- Option A: apply directly to the licensing authority who has issued the license for the approval of an OJT (to be proposed in a document outside the MOE). This option should normally be considered by organisations and not by individuals.
- Option B: find an agreement to follow an already approved OJT at another organisation, which was approved by the same licensing authority who has issued the license. Possibility also exists to follow an OJT which was approved by any other licensing authority, however in such a case the final acceptance of this OJT for the purpose of endorsing the first type rating in the license remains at the sole discretion of the competent authority issuing the license.

It is recommended that prior to starting any OJT, the licensing authority who has issued the license is contacted to verify its acceptance of any possible intended option.

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/46840

Privileges of a Part-66 licence

I am the holder of a B1.2 licence (i.e “aeroplane piston”). Can I exercise my privileges for piston-engine non-pressurised aeroplanes1 of 2000 kg MTOM and below (i.e. category B3)?

Answer

By default, a category B3 licence is included in a category B1.2 licence because the basic knowledge requirements (66.A.25(a)) and the basic experience requirement (66.A.30) for a B3 licence are covered by the similar requirements of a B1.2 licence.

Provided that the qualification requirements are fulfilled, the B1.2 licence holder can release maintenance tasks performed on piston-engine non-pressurised aeroplanes of 2000 kg MTOM and below.

In particular the B1.2 licence holder would have to meet 66.A.20(b), which means that:

- the applicable requirements of Part-M, Part-ML, Part-145 and/or Part-CAO will be complied; and
- in the preceding two-year period he/she has 6 months of maintenance experience in accordance with the privileges granted by the aircraft maintenance licence or; met the provision for the issue of the appropriate privileges; and
- he/she has the adequate competence to certify maintenance on the corresponding aircraft; and
- he/she is able to read, write and communicate to an understandable level in the language(s) in which the technical documentation and procedures necessary to support the issue of the certificate of release to service are written.

AMC 66.A.20(b)(2) and GM 66.A.20(b)2 gives further explanations on the 6-months maintenance experience in the last 2 years, including **demonstration of experience on at least one aircraft type per aircraft structure (metal, composite or wood)**[1]

[1] - “Aeroplane” does not include “helicopter”.

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19091

Can I have endorsed in my Part-66 licence aircraft types for which the Basic Regulation is not applicable?

Answer

The competent authority of the Member State issuing the licence may include in the Annex (Section XIV) of EASA Form 26 types for which the Basic Regulation is not applicable. The privileges endorsed for these types are based only on the national rules. The use of Section XIV of EASA Form 26 is optional.

EASA does not have any information about these types. If you want to get information about them, please contact thecompetent authority.

Last updated:
22/03/2019

Link:
https://www.easa.europa.eu/en/faq/19022

Point 66.A.20(b)(2) requires in the preceding 2 years, 6 months of experience or to meet the provisions for the issue of the appropriate privileges. What does it mean? Does it affect the validity of the Part-66 licence?

Answer

The “validity” of the Part-66 licence is not affected by point 66.A.20(b)(2). The licence itself remains valid 5 years from the last renewal.
Nevertheless, compliance with point 66.A.20(b)(2) is required to ensure that the maintenance privileges are exercised by certifying staff that hold sufficient recent experience.
If you do not meet this point anymore, you lose your rights to exercise your privileges of certifying staff or support staff.
Therefore, as holder of an aircraft maintenance licence, to exercise your certification privilege in accordance with 66.A.20(b)(2), please ensure:

• You have accumulated 6 months of experience in the previous 2 years;

Note: see also AMC 66.A.20(b)(2) for possible reductions of experience, in particular for independent certifying staff. Demonstration of experience should be made on the particular or similar aircraft. Guidance on ‘similar’ aircraft is also provided in AMC 66.A.20(b)(2).

or

• You can demonstrate that in the last 2 years, you have met the provisions for the issue of appropriate privileges, which means (refer to 66.A.45), as applicable to the case:

1) going to a type-training course again (the need for OJT has to be assessed on case-by-case basis);

or

2) when the aircraft endorsement does not require type training (aircraft belonging in Group 2, 3 or 4):

a) pass a type evaluation, including practical assessment;

or

b) when no type evaluation is required for aircraft endorsement, for example:
- a B2/B2L license endorsed with a full group 3 or 4 rating; or

- for L-category licences (other than L5),

being able to demonstrate, in the last 2 years, practical experience, which shall include a representative cross section of maintenance activities relevant to the licence subcategory (B2/B2L, L1, L1C, L2, etc.)

Note: "A representative cross section of maintenance activities" means representative cross-section of the tasks listed in Appendix II to AMC to Annex III (Part-66) "Aircraft Type Practical Experience and On-the-Job Training - List of Tasks".
"Demonstrate" means having a record thereof, such as a logbook.
Note: GM 66.A.20(b)2 will be reviewed and amended according to this interpretation through rulemaking task RMT.0735.

Last updated:
14/11/2024

Link:
https://www.easa.europa.eu/en/faq/19023

As a category A certifying staff at line, can my authority allow me to carry out more tasks than those specified in AMC 145.A.30(g)?

Answer

The list of typical tasks to be carried out by a category A certifying staff at the line shown in the AMC include a (r) stating: "Any other task agreed by the competent authority as a simple task for a particular aircraft type. This may include defect deferment when all the following conditions are met:

- there is no need for troubleshooting; and
- the task is in the MEL, and
- the maintenance action required by the MEL is agreed by the competent authority to be simple.

When these conditions are met, your authority may allow other tasks to be carried out under AMC 145.A.30(g).

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19028

Part-147

Basic training

Is it possible to grant a Part-147 approval to a training organisation which intend to conduct only training on one or only several modules?

Answer

No, a Part-147 approval can only be granted to an organisation which plans to conduct training on all the modules related to a (sub)category of an aircraft maintenance licence, so that a full understanding of the training needs, interfaces and examination relative to that (sub)category of licence is achieved.

However, some modules may be sub-contracted as mentioned in 147.A.145(d).

It does not mean that the Part-147 organisation is not allowed to conduct courses on just one module. In particular, in the case of limitations resulting from the conversion process, limitations can be lifted through the teaching and/or examination of one module or a part of a module.

Last updated:
13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19071

I have completed a part of my basic training course (including some module examinations) in an approved Part-147 organisation. I'm moving to another country and would like to continue my basic training in a Part-147 organisation located in the country where I move in. Is this possible? What will happen with my certificates? Can I get the maximum reduction of the experience required for the Part-66 licence?

Answer

There are several scenarios possible depending on the particular case. Here are some most probable cases for category A, B1, B2, B2L, B3 or L:

Case No 1 (baseline – standard case): The applicant completes the whole basic knowledge course (including the training, practical assessments and basic modules examinations) in an approved Part-147 maintenance training organisation.

Result: The Certificate of Recognition (CoR) of the basic course completion is issued by the organisation. The applicant can apply for the Part-66 licence with 1 or 2 years of maintenance experience (66.A.30).

Case No 2: The applicant completes the basic training in two different Part-147 AMTO (including the examinations).

Result: The CoRs for the successful examination of each individual module are issued (by different AMTO), but not the CoR for the basic course completion. The applicant does not benefit from the experience reduction and have to fulfil the requirement of 2 or 3 years of experience (if recognised as skilled worker) or 1, 2, 3 or 5 years (66.A.30).

- It may happen that some of the competent authorities would give the complete credit on experience in case the applicant can prove that: the training completed in different organisation covers in total the Appendix I or Appendix VII syllabus; and
- all the practical assessments are performed and passed successfully; and
- all interactions between the modules have been correctly addressed; and
- there was a right proportion of theoretical and practical training for each subject.

As this demonstration requires a significant investment, the applicant is invited to directly contact the competent responsible for performing such an investigation.

Case No 3: The applicant has completed a full basic training course in one approved Part-147 organisation. Unfortunately, the candidate was not in a position to successfully pass the full examination process (all modules) in that organisation and had to pass the missing portion of the examination in another approved Part-147 organisation.

Result: In this case the applicant would receive a CoR for basic training only as well as the CoRs related to the modules successfully passed in that approved Part-147 organisation. The examination for the missing modules may be successfully passed in another approved Part-147 organisation(s) with issuance of the related CoRs thereof. The combination of all these CoRs may be sufficient for the competent authority to recognise the training course as successfully "completed" and to grant the maximum credit for the experience (only 1 or 2 years needed, see case No 1) for the issue of the license.

Case No 4: The applicant did not attend a Part-147 basic training course but only took examinations in one or more approved Part-147 organisation(s).

Result: The applicant would receive several CoRs for the successful examination of individual modules from one or more approved Part-147 organisations. No credit of experience as per 66.A.30 will be granted (except for skill workers – 2 or 3 years). Standard 1, 2, 3 or 5 years of experience will be required.

Further information is given in AMC to Appendix III to Part-147 "Certificates of Recognition referred to in Annex IV (Part-147) – EASA Forms 148 and 149.

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19079

Is it possible to grant a Part-147 approval to a training organisation which intend to conduct only basic knowledge

examinations?

Answer

No, a Part-147 approval can only be granted to an organisation which can prove its capability to conduct training and examinations on a complete syllabus of at least one (sub)category of the Part-66 licence. Only in the case the organisation holds the approval for the complete basic training course, it may conduct basic examinations not being an integral part of the approved basic training course.

Last updated:
13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19070

Is it possible to grant a Part-147 approval to an organisation applying only for basic knowledge training?

Answer

Yes, in such case Form 148 shall be used as template for the Certificate of Recognition, which specifies “Basic training course” or “Basic examination”. In the particular case where all modules are not conducted, the certificate shall state only “Basic training course” and the modules conducted be mentioned on the certificate including the date(s) of the training module(s).

Reference: 147.A.145

Last updated:
29/01/2021

Link:
https://www.easa.europa.eu/en/faq/19068

Part-147 approved organisations have the privilege to carry out basic examinations on behalf of the competent authority. Does this imply that the said authority has to supply or approve examination questions?

Answer

No, the competent authority does not have to supply examination questions. However, as part of the oversight, the authority must sample check and review the organisations' question data bank and the examination process.

Last updated:
13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19074

Type training

Is it possible to perform aircraft type training in two different organisations? Can I do my practical portion of the type training in a Part-145 organisation?

Answer

Only a Part-147 organisation has the privilege (if approved by its competent authority) to provide aircraft type training courses. This comprises both the theoretical and practical element of the aircraft type training, including the related examinations and assessments. This means that the practical element of the aircraft type training shall be completed in a Part-147 organisation.

However, the aircraft type training may be conducted physically in a Part-M Subpart F, Part-145 or Part-CAO organisation under the control (and as a part of the approval) of a Part-147 organisation issuing the Certificate of Recognition. It is not the privilege of

the Part-M Subpart F, Part-145 or Part-CAO organisation to conduct aircraft type training courses on its own.

In addition, the theoretical and practical element of the aircraft type training can be conducted by two different approved Part-147 organisations. The competent authority endorsing the type rating on the license should be convinced that the interfaces have been correctly addressed before proceeding thereof (66.B.115(b) refers).

In the special case where the aircraft type course is directly approved by the competent authority in accordance with the procedure 66.B.130 (i.e. only on a case by case basis – special authorization not granted for long term periods), the training can be conducted outside the scope of a Part-147 organisation. As a consequence, the certificate issued is not mutually recognized between Member States, which means it can only be used for aircraft type endorsement by the licensing authority who issued that direct approval.

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01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19080

How should the 50% of tasks required for practical training be selected? Should it be 50% of tasks as per glossary (e.g. LOC, FOT, SGH, R/I, etc.)?

Answer

The selection of 50% of tasks cannot be selected according to the glossary. Paragraph 3.2 of Appendix III to Part-66 clearly states that ‘the tasks selected shall be representative of the aircraft and systems both in complexity and diversity. In addition, the practical training should particularly address the tasks which cannot be explained by theoretical training only. While relatively simple tasks may be included, other more complex tasks shall also be incorporated and completed as appropriate to the aircraft type.

Regarding the way to read the table in paragraph 3.2, the lines aims at covering the main systems so that no line relevant to the particular aircraft type should be omitted in the selection. Inside each line applicable to the aircraft type, half or more of the crosses can be selected. From a learning point of view, selecting 2 simple tasks as LOC and SGH would not be “representative”, while selecting LOC and TS, for example, would be much more appropriate.

When selecting the tasks, the usage of filtering method based on the criteria similar to that described in AMC to paragraph 3.1(d) of Appendix III to Part-66, point 5 f) is recommended.

Last updated:
13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19081

What is the minimum duration of the practical element of the aircraft type training?

Answer

The duration of the practical training should ensure that the content of training required by paragraph 3.2 of Appendix III to Part-66 is completed. However, for aeroplanes with a MTOM equal or above 30000 kg, AMC to paragraph 1(b), 3.2 and 4.2 of Appendix III to Part-66 recommends the duration of the practical element of a type rating training course be not less than two weeks, unless a shorter duration meeting the objectives of the training and taking into account pedagogical aspects (maximum duration per day) is justified to the competent authority. This means that the duration of the a/c type practical training is not the main driver as justified by the status of that AMC. According to point 3.2 (b) Appendix III to Part-66 (having the status of requirement), the duration should be based on the content sufficiently representative in diversity and complexity in order to gain the needed competence.

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01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19078

Examination

Can an examination be limited to some modules only, or one module only or part of a module only?

Answer

As mentioned in the previous question, for some particular cases, the basic training need to be conducted and the relevant examination to be passed on some modules only or one module or part of a module (this is typically the case where the holder of a licence applies for removing some limitations mentioned in his/her licence).

However, the Part-147 organisation should be capable of conducting the full course relative to the (sub)category sought, so that they can run the examination.

Last updated:
13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19072

Should examiners be specialists in the subjects, or can they be responsible for the proper conduct of the examination without being responsible for the content?

Answer

“Examiner” should be here understood as “invigilator” (i.e. the personnel responsible for merely running the examination).

The examiners (invigilators) are not required to be experts in the subjects examined when relative to the MCQs in accordance with Appendix II to Part-66. However, the assessment of essay questions as part of the basic knowledge has to be conducted by knowledgeable personnel with the help of a standard reply. Eventually, the invigilators must be trained to the examination process.

Examiners should demonstrate a clear understanding of the examination standard required by Part-66 and have a responsible attitude to the conduct of examinations such that the highest integrity is ensured. (GM 147.A.105(g)).

Regarding the type training examination and assessment standard as well as type examination standard as described in Part-66, Appendix III, paragraphs 4 and 5, the theoretical element examination can follow the same principle as above; however, for the practical element assessment, the examiner(s) must be appropriately qualified. Further provisions are available in Appendix III to AMC to Part-66.

Last updated:
13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19075

What is the maximum number of students attending the examination?

Answer

147.A.100(b) defines the facility requirements for the instructions of theory and the conduct of knowledge examinations. Point 1 deals with the facility requirement for knowledge training whereby the number of students shall not exceed 28. Point 2 defines the facility requirements for the examination purposes, where the maximum number of students attending the knowledge

examination is not limited. The number of students attending the knowledge examination is indirectly limited only by the size, layout and arrangement of the accommodation in order to fulfil the following requirements:

- … no student can read the paperwork or computer screen of any other student from his/her position during examinations (147.A.100(b)2), and
- Examination candidates shall be separated from each other so that they cannot read each other's examination papers. (66.B.200(h)).

Consequently, as long as the facility and examination standard as well as the integrity of the examination can be ensured, the number of candidates attending the examination may not be limited. In case of a larger number of candidates, two or more examiners may be used to ensure the integrity of the examination, such as separation of the candidates, no potential cheating, no speaking to each other, only examination paper on the table, no examination paper removed from the room, etc.

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13/04/2015

Link:
https://www.easa.europa.eu/en/faq/19077

Others

Shall a Part-147 approved organisation have a mandatory occurrence reporting system according to Regulation (EU) No 376/2014?

Answer

Article 4 of Regulation (EU) No 376/2014 defines the persons and organisations obliged to report occurrences under the "mandatory reporting system". Personnel working at/for organisations approved in accordance with EASA Part-147 are not listed in paragraph 6 of article 4, therefore such organisations are not required to implement mandatory/voluntary reporting systems according to Regulation (EU) No 376/2014. This does not prevent any organisation or person involved in aviation activities, including maintenance training activities, to report any safety occurrence or other safety information they consider relevant.

Such reports would be to the voluntary reporting system to be established by all competent authorities according to Article 5.2 of Regulation (EU) No 376/2014.

Typically, a Part- 147 approved training organisation having implemented a Safety Management System (SMS) on a voluntary basis would have such a voluntary occurrence reporting system.

The European Commission (EC) published Guidance Material for Regulation (EU) No 376/2014. Paragraph 3.3 further elaborates on the organisations affected by that regulation.

An online service developed by the EC allows organisations and individuals to report aviation safety occurrences to aviation authorities.

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/21037

Part-147 approved organisations can also give courses outside the scope of Part-66. Can these courses be certified? (e.g. continuation training for the purpose of the certifying staff privileges as required by M.A.607, 145.A.35 or CAO.A.040, task training, NDT, engine run, HF, SMS, etc.)

Answer

Courses outside the scope of Part-66 cannot be part of the Approval Schedule of the approved Part-147 organisation. This does not prevent a training organisation to provide such courses. The scope, content and the delivery methods of these courses will not be reviewed by the Agency or the EASA Member States, as part of the audit scope of the Part-147 organisation. However,

when Part-M, Part-ML, Part-145 or Part-CAO requires the staff to be trained, the appropriateness of such training being delivered would be assessed during the audits of these particular organisations.

Last updated:
01/02/2021

Link:
https://www.easa.europa.eu/en/faq/19073

How can I become an EASA aircraft maintenance instructor?

Answer

Part-147, in particular, 147.A.105 (f), state that the experience and qualifications of instructors, knowledge examiners and practical assessors shall be established in accordance with criteria published or in accordance with a procedure and to a standard agreed by the competent authority. There are no additional requirements or guidance published in EASA rules regarding the experience and qualification of instructors, except that it is recommended that potential instructors be trained in instructional techniques.

The eligibility of candidates to a permanent or temporary (contracted independent) instructor's position must be assessed in regards to the minimum qualifications defined by the concerned Approved Part 147 Training Organisation. The Organisation's procedures should detail these minimum qualifications and associated eligibility criteria in terms of technical knowledge, pedagogical and instructional skills and working experience.

EASA does not issue Instructor licences or equivalent, and permanent or contracted instructors can only exercise instruction privileges through the approval of a Training Organisation. Instructors are nominated by the approved organisation, which keep detailed records of their qualifications and are audited by the authority. Their authorised scope of activity is then stated on Terms of Reference provided to the instructors, as well as on the instructor/ examiners/ assessors approved list.

For any further questions, we advise you to contact the training organisation Quality Assurance Dept. and/ or the Competent Authority (the one who granted the approval), in order to enquire about the possibility to be nominated as an instructor.

Last updated:
27/02/2018

Link:
https://www.easa.europa.eu/en/faq/45488

Should the Part-147 organisation's quality system be audited?

Answer

147.A.130(b) states that the approved Part-147 organisation shall establish a quality system including:

1. an independent audit function to monitor training standards, the integrity of knowledge examinations and practical assessments, compliance with and adequacy of the procedures, and
2. a feedback system of audit findings to the person(s) and ultimately to the accountable manager referred to in 147.A.105(a) to ensure, as necessary, corrective action

This means that the quality system itself should be independently audited. The competent authority cannot perform this function on behalf of the organisation.

Within its approved procedures, the organisation has to monitor the quality system's procedures. This implies that quality system monitoring itself must be subject to internal audits:

- no conflict of interest is allowed - it is not permitted that such a function be performed by quality system's staff;
- This can be also outsourced;
- the right level of the auditor(s)' position within the organisation shall be met in order to assure the objective of 147.A.130(b)2.

(e.g. conflict of hierarchy, which could hinder an efficient and transparent report to the accountable manager). In addition, the audit programme/plan needs to reflect this regulatory aspect.

The EASA Flight Standard Directorate consistently applies that policy during their standardisation inspections.

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Link:

https://www.easa.europa.eu/en/faq/19076