European Union Aviation Safety Agency

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).

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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.

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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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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).

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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)	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

Additional information:

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)].

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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**

	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
Commercial DTO	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
	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
Non-Commercial DTO			With the exception of complex maintenance tasks under Part-M:
	Maintenance	Part-145 organisation is required	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.

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