European Union Aviation Safety Agency

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.

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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.

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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			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

	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.	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)	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.	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). 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 certifying staff is qualified following the procedures established by the organisation, Part-66 licence is not required.	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 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				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.
	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)).	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”

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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.

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Link:
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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)).*

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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)."*

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