European Union Aviation Safety Agency

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.

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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.

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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.

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