

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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15/12/2014

Link:

<https://www.easa.europa.eu/es/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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<https://www.easa.europa.eu/es/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			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(t). 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.
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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.
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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.
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Specialised services				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.
	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.	

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). 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 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.	

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.	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.
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).	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.
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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. 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.

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)).	
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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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Link:

<https://www.easa.europa.eu/es/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.

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Link:

<https://www.easa.europa.eu/es/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)).*

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<https://www.easa.europa.eu/es/faq/142008>

My maintenance organisation (B/C-rated Part-145 organisation or combined airworthiness organisation (CAO) with class “components”) has received a work order for the ‘overhaul’ of an engine or component. What conditions should be fulfilled in order to issue EASA Form 1 with “Overhauled” Status/Work in Block 11?

Answer

For reference: “Overhaul is defined as a process ensuring that the item conforms fully to all applicable service tolerances specified by the type certificate (TC) holder, equipment manufacturer, or other data approved/accepted by the Authority. It requires at least

disassembly, cleaning, inspection, repair as necessary, reassembly, and testing.” (Paragraph 5, Block 11 of Appendix II to Annex I (Part-M) of [Regulation \(EU\) No 1321/2014](#)).

In case the appropriately rated approved maintenance organisation (AMO) has received a clear work order for an overhaul and holds the applicable maintenance data for the part (e.g. Component Maintenance Manual (CMM), if available), the AMO may proceed with the overhaul if:

1. The original equipment manufacturer (OEM) defines an overhaul process in the maintenance data (e.g. in the CMM). In this case, the AMO must follow it as the primary reference. The AMO can then certify the component as "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 options:
 1. Apply the EASA definition of "overhaul" by dismantling, cleaning, inspecting, repairing (as necessary), reassembling, and testing the component; or
 2. When, for example, a full disassembly or testing is not possible without causing damage and there are service tolerances specified for the part/component by the TC holder, equipment manufacturer, Instructions for Continuing Airworthiness (ICAs), or other data approved/accepted by the Authority, perform **all possible maintenance actions** described in the available maintenance data.

We assume that, in either case, the AMO has ensured that the component meets all applicable service tolerances.

Therefore, under these conditions, it would be acceptable to certify the component as "Overhauled" in Block 11 of EASA Form 1.

It is worth noting that points "a" and "b" are effectively equivalent to an overhaul when the CMM already includes a sequence of disassembly, cleaning, inspection, repair (if necessary), reassembly, and testing, which mirrors the requirements of Appendix II to Part-M.

NB

- If a CMM exists for a certain part, and the AMO does not have access to it, the part cannot be released as "Overhauled" based only on other general documents such as an Engine Shop Manual (ESM).
- If a specific overhaul procedure is defined in the maintenance data but not fully followed, the part cannot be released as "Overhauled".
- In all cases, the AMO must clearly describe in Block 12 of EASA Form 1 the maintenance actions performed to achieve the "Overhauled" status, as well as the reference to the chapter(s) of the maintenance data used.

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