

FAQs:

[COVID-19 - Continuing Airworthiness](#), [Continuing Airworthiness](#), [Regulations](#)

Question:

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).

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Link:

<https://www.easa.europa.eu/fi/faq/116319>