



# Terms of Reference

for rulemaking task RMT.0255 (MDM.059)

## Review of Part-66

ISSUE 2

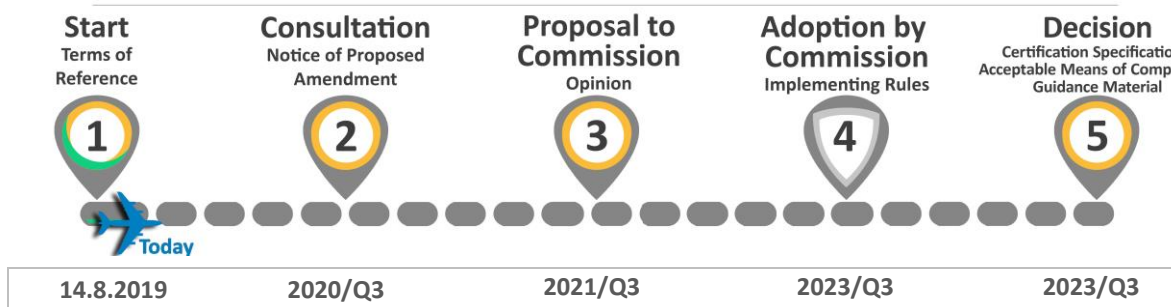
### Issue/rationale

The objective of this rulemaking task (RMT) is to address some shortcomings that are linked to the effectiveness and efficiency of the current requirements and that were identified in the EASA maintenance licensing system<sup>1</sup>, namely:

- type rating endorsement for 'legacy aircraft';
- on-the-job training (OJT);
- deficit of practical skills of maintenance personnel; and
- obsolescence of the Basic Knowledge (BK) syllabus.

<b>Action area:</b>	Continuing Airworthiness		
<b>Affected rules:</b>	Commission Regulation (EU) No 1321/2014 and related AMC and GM		
<b>Affected stakeholders:</b>	Approved maintenance training organisations (AMTOs); aircraft maintenance licence (AML) applicants and holders; competent authorities (CAs)		
<b>Driver:</b>	Efficiency/proportionality	<b>Rulemaking group:</b>	Yes
<b>Impact assessment:</b>	Light	<b>Rulemaking Procedure:</b>	Standard

• EASA rulemaking process milestones



<sup>1</sup> Evaluation report related to the EASA maintenance licensing system and maintenance training organisations ([https://www.easa.europa.eu/sites/default/files/dfu/18D50946\\_Evaluation%20Report%20Part-66\\_147%20%28to%20AB%29.pdf](https://www.easa.europa.eu/sites/default/files/dfu/18D50946_Evaluation%20Report%20Part-66_147%20%28to%20AB%29.pdf)).



## 1. Why we need to change the rules — issue/rationale

Following the legal requirement<sup>2</sup> to monitor the application of the rules, EASA launched at the end of 2016 an evaluation exercise on the effectiveness of the implementation of the requirements of the EASA maintenance licensing system<sup>3</sup> and maintenance training organisations<sup>4</sup>. As a result, an evaluation report was published, indicating the strong EU added value and robustness of the EASA maintenance licensing system and identifying some areas where there is room for improvement. Some of the issues identified were:

- difficulty in meeting the objectives of the Part-66 and Part-147 in some cases, such as the required OJT, and in updating the content of the training courses in relation to technological evolution or aircraft for which there are no courses available (e.g. legacy aircraft);
- duplication of efforts due to less efficient processes, as training courses and OJT approved by a competent authority are not mutually recognised by other competent authorities;
- reduction of the efficiency of some processes due to the lack of courses covering specific commercial cases; and
- high impact on the credibility of the maintenance training system due to fraud cases and, in some cases, cultural acceptance of cheating.

EASA identified the best intervention strategy in order to address each of the identified issues, considering both regulatory and non-regulatory actions. In particular, the following topics are considered of special interest:

- (a) Type-training for aircraft for which there are no courses available.

Mainly due to the difficulties for maintenance training organisations to justify a business case, there is a difficulty in finding a Part-147 type training for some Group 1 aircraft, especially for out-of-production aircraft for which a number of units are still in service (often called 'legacy aircraft').

- (b) OJT

In terms of fulfilling the OJT objectives, the following implementation problems have been reported:

- (i) the 'list of tasks' included in the acceptable means of compliance (AMC) to perform OJT does not fit well with all aircraft types;

<sup>2</sup> Article 85(8) of Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R1139&qid=1559296868436&from=EN>).

<sup>3</sup> Annex III (Part-66) to Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1) (<http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32014R1321>).

<sup>4</sup> Annex IV (Part-147) to Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1) (<http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32014R1321>).

- (ii) difficulties in finding approved maintenance organisation (AMO) rated on aircraft models that are compatible with the approved OJT programme;
  - (iii) lack of acceptance of the OJT programme by the licensing authority when it is not the authority that initially approved the procedures of the OJT; and
  - (iv) proportionality of the OJT requirements to achieve its inherent objectives.
- (c) Lack of practical skills of maintenance personnel
- E.g. the opinion of several AMOs is that some maintenance errors can be reduced by improving practical training by means of alternating between theoretical and practical training within the basic training.
- (d) Obsolescence and optimisation of the basic knowledge syllabus
- The basic knowledge modules of Part-66 Appendix I do not adequately capture the state of the art of the current technology.
- Furthermore, the structure of the basic knowledge syllabus is not fully coherent and not aligned with the type-training syllabus, especially when the particular aircraft type it is not a conventional aeroplane.

## 2. What we want to achieve — objectives

The objective of RMT.0255<sup>5</sup> is to improve the efficiency, the proportionality, and the level playing field of the Part-66 maintenance licensing system. The task aims to address the issues that were identified when reviewing Part-66.

The specific objectives are to:

- (a) enhance the efficiency of the licensing system for Group 1 aircraft (ref.: 66.A.5), for which an individual type-training course is no more available (known also as ‘legacy aircraft’);
- (b) proportionate the OJT system for the end user in a more flexible way;
- (c) improve the practical skills of the candidates during the basic- and type-training;
- (d) modernise the content of the basic syllabus modules and make it easier to update.

## 3. How we want to achieve it

The review will focus on the issues that are identified above and for which some consultation processes, as well as the systematic analysis of the entire Annex III to Regulation (EU) No 1321/2014 (Part-66), have already proposed certain measures that could solve or mitigate them:

- (a) Introduction of flexibility provisions in the rule, in order to facilitate the acquisition of the type rating for ‘legacy aircraft’ and identify equivalent type rating endorsement means;
- (b) Redefinition of the requirements and/or the structure of the OJT to fulfil the OJT objectives in a more flexible way;
- (c) Introduction of competency-based training (CBT) principles in the maintenance training system and harmonisation with ICAO standards and guidelines;

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<sup>5</sup> <https://www.easa.europa.eu/document-library/general-publications/european-plan-aviation-safety-2019-2023>

- (d) Removal of 'old' technology elements and enable easier updating of the modules, thus enhancing coherence between Appendix I and Appendix III of Part-66;

In addition, Regulation (EU) No 1321/2014<sup>6</sup> and its related acceptable means of compliance and guidance material (AMC and GM) will be amended in relation to some missing definitions (type rating variant, difference training, etc.) to enhance the harmonisation and integration with the operational suitability data for maintenance certifying staff (OSD-MCS), when needed.

The working group may propose alternative actions to solve the issues, if they are considered to be more adequate or efficient.

#### 4. What are the deliverables

- A notice of proposed amendment (NPA) to propose amendments to Annex III (Part-66) to Regulation (EU) No 1321/2014, and to the related AMC and GM for its implementation;
- a comment-response document (CRD);
- an EASA Opinion to amend Regulation (EU) No 1321/2014;
- after adoption by the Commission, an ED Decision to amend the related AMC and GM.

#### 5. How we consult

A rulemaking group will be set up to work on the proposed actions of Section 3. The group members will assist EASA in the drafting of the NPA and the review of the comments to it. EASA initially plans to hold three meetings before issuing the NPA.

#### 6. Interface issues

Cross-consultation and coordination with RMT.0544 (Part-147 review task) will be necessary.

#### 7. Profile and contribution of the rulemaking group

The rulemaking group will be composed of representatives of:

- competent authorities' staff dealing with Part-66/Part-147;
- associations of maintenance organisations and other relevant industry sectors.

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<sup>6</sup> Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014) (<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014R1321&qid=1542122463691&from=EN>).

## 8. Reference documents

### 8.1. Related RMTs

Amendments to Part-66 may be proposed through the following RMTs once the subsequent opinion(s) is (are) adopted:

- RMT.0097 (145.024) 'Functions and responsibilities of B1 and B2 support staff — link with sign off'<sup>7</sup>
- RMT.0106 'Certification Specifications and Guidance Material for maintenance certifying staff type-training courses'<sup>8</sup>
- RMT.0281 (MDM.082) 'New training methods or new teaching technologies (Part-66/Part-147)'<sup>9</sup>

### 8.2. Affected regulations

- Commission Regulation (EU) No 1321/2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1)

### 8.3. Affected decisions

- Executive Director Decision 2015/029/R of 17 December 2015 issuing acceptable means of compliance and guidance material to Part-M, Part-145, Part-66, and Part-147 of Regulation (EU) No 1321/2014 and repealing Decision 2003/19/RM of the Executive Director of the Agency of 28 November 2003 ('AMC and GM to the Annexes to Regulation (EU) No 1321/2014 — Issue 2')<sup>10</sup>

### 8.4. ICAO or third-country references relevant to the content of this RMT

- ICAO Doc 10098 'Manual on Training of Aircraft Maintenance Personnel' (once the document will be finalised by the ICAO Competency-based Training and Assessment Task Force (CBTA-TF))

<sup>7</sup> <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0097-145024>

<sup>8</sup> <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0106-21039e>

<sup>9</sup> <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0281-mdm082>

<sup>10</sup> <https://www.easa.europa.eu/document-library/agency-decisions/ed-decision-2015029r>

