COMMENT RESPONSE DOCUMENT (CRD) TO NOTICE OF PROPOSED AMENDMENT (NPA) 2007-13

for amending Commission Regulation (EC) No 1702/2003 of 24 September 2003 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations

AND

for amending Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

AND

for amending Decision No 2003/01/RM of the Executive Director of the Agency of 17 October 2003 on Acceptable Means of Compliance and Guidance Material for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations ("AMC and GM to Part 21")

AND

for amending Annex I "Acceptable Means of Compliance to Part-M", Annex II "Acceptable Means of Compliance to Part-145" and Annex III "Guidance Material to Part-145" of Decision No 2003/19/RM of the Executive Director of the Agency of 28 November 2003 on Acceptable Means of Compliance and Guidance Material to Commission Regulation (EC) No 2042/2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

AND

for creating Guidance Material for Part-M

"Authorised Release Certificate EASA Form 1"

Explanatory Note

I. General

1. The purpose of the Notice of Proposed Amendment (NPA) 2007-13, dated 12 September 2007 was to propose an amendment to the following four documents:

   - Commission Regulation (EC) No 1702/2003[1] of 24 September 2003 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations;
   - Commission Regulation (EC) No 2042/2003[2] of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks;
   - Decision No 2003/01/RM of the Executive Director of the European Aviation Safety Agency of 17 October 2003[3] on Acceptable Means of Compliance and Guidance Material for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations ("AMC and GM to Part 21") and
   - Annex I "Acceptable Means of Compliance to Part-M" and Annex II "Acceptable Means of Compliance to Part-145" of Decision 2003/19/RM of the Executive Director of the European Aviation Safety Agency of 28 November 2003[4].

   Additionally, in response to comments received, the Agency also proposes creating Guidance Material for Part-M, and amending Annex III "Guidance Material to Part-145" of Decision 2003/19/RM of the Executive Director of the European Aviation Safety Agency of 28 November 2003.

   Changes that are likely to occur as a result of Agency Opinion 02/2008 (Revised Part-M requirements for aircraft not used in commercial air transport) before 28 September 2008 will be taken into account at the stage of the Opinion/Decision for this rulemaking task in the case of interaction.

II. Consultation

2. The NPA 2007-13 was published on the web site (http://www.easa.europa.eu) on 12 September 2007.

3. By the closing date of 12 December 2007, the European Aviation Safety Agency (hereinafter referred to as the Agency) had received 171 comments from 25 National Aviation Authorities, professional organisations and private companies.

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[1] OJ L 243, 27.9.2003, p.6. Regulation as last amended by Commission Regulation (EC) No 287/2008 of 28 March 2008 (OJ L 87, 29.3.2008, p.3).

[2] OJ L 315, 28.11.2003, p. 1. Regulation as last amended by Commission Regulation (EC) No 376/2007 of 30 March 2007 (OJ L 94, 4.4.2007, p. 18).

[3] Decision as last amended by ED Decision 2007/012/R of 22 November 2007.

[4] Decision No 2003/19/RM of the Executive Director of the European Aviation Safety Agency of 28 November 2003 on acceptable means of compliance and guidance material to Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks.

III. Publication of the CRD

4. All comments received have been acknowledged and incorporated into this Comment Response Document (CRD) with the responses of the Agency.

5. In responding to comments, a standard terminology has been applied to attest the Agency's acceptance of the comment. This terminology is as follows:

- **Accepted** – The comment is agreed by the Agency and any proposed amendment is wholly transferred to the revised text.
- **Partially Accepted** – Either the comment is only agreed in part by the Agency, or the comment is agreed by the Agency but any proposed amendment is partially transferred to the revised text.
- **Noted** – The comment is acknowledged by the Agency but no change to the existing text is considered necessary.
- **Not Accepted** - The comment or proposed amendment is not shared by the Agency

6. The resulting text highlights the changes as compared to the current rule. The amended EASA Form 1's for production and maintenance are added as Appendix I and Appendix II at the end of this CRD.

7. The Agency's Opinion will be issued at least two months after the publication of this CRD to allow for any possible reactions of stakeholders regarding possible misunderstandings of the comments received and answers provided.

8. Such reactions should be received by the Agency not later than 25 September 2008 and should be submitted using the Comment-Response Tool at http://hub.easa.europa.eu/crt.

IV. CRD table of comments and responses.

(General Comments)	-

comment	*19* comment by: *Amsafe Bridport Ltd.* I have circulated your proposals with our company (AmSafe Brdiport Limited) and the response from users of the EASA Form 1 is as follows: "My only comment is that in removing block 9 they are proposing to renumber the other boxes. It would be easier for us and I suspect others if they could leave the other boxes (10 onwards) with the same numbers. Procedures will have to be completely re-wriiten to re-number all the blocks rather than just deleting block 9". This seems a valid commnet and we only ask that you consider this. Thank you, Mark Trafford on behlaf of Amsafe Bridport.
response	*Not accepted* The option to leave block 9 empty was discussed in the drafting group. In paragraph 33 of the Regulatory Impact Assessment the rationale to change the form is provided.

comment	*26* comment by: *EUROCOPTER* Eurocopter has no comment on this NPA 2007-13.
response	*Noted*

comment	*35* comment by: *CAA CZ* 1) The denomination "Authorised Release Certificate" and in particular the abbreviation "ARC" it implicates may be confusing, taking into account that the same abbreviation is used for Airworthiness Review Certificate (ARC). The opportunity of the Regulation change could be also used for a unification of the Certificate denomination. In Part 145 and Part M (and also the respective AMCs and GMs) texts the document has been referred to as "Certificate of Release to Service" (CRS). In our opinion this denomination might be taken into account. 2) Reading of the corresponding articles in all Parts, AMCs and GMs should be (where applicable) as identical as possible. The opportunity of the Regulation change should also be used for unification of these texts; however, this has not been done thoroughly. The same applies for User / Installer Responsibilities at EASA Form One patterns in all Appendices to Part 21, Part M and Part 145. The Appendix I to Part 21 differs from the other two Appendices. 3) Some provisions of the existing reading should remain in the respective Appendices as follows: "The certificate (usually the original issue) must accompany each item and the correlation must be.....„ "Where a single certificate was used to release a number of items and those items have been subsequently separated out from each other (such

	as through a part distributor), then a copy of the original certificate must accompany such items and the original certificate must be retained by the organisation, which originally received the batch of items. Failure to retain the original certificate could invalidate the release status of the respective items." 4) EASA Form 1 is the only document, which can be used for keeping data about production date, operation, service periods / life of those items, which have limited service periods / lives. The document is, however, not equipped with any Log-book or other permanent accompanying document keeping service and maintenance records through all service life of the item. Therefore, provision of these data from the respective Maintenance Organisations to the Operators and back must be strictly requested by the Regulation and EASA Form One itself should be equipped with the special Block for that purpose, where the current values of service hours / cycles / time period since production / overhaul of the item must be filled in, or, if the item has no such limitation, the Block must be filled with "N/A", which shows that the requested information has not been negligently omitted. 5) All the respective Appendices should be, according to our opinion, complemented as follows: Block 10: "Serial or Batch Number" " ... to be identified with a serial or batch number, ..., any other serial or batch number not required ... there is no serial or batch number identified ..." The text „Batch No." is missing, which could lead to loss of traceability of products which are not identified by Serial Numbers and for which Block 5 states „N/A". Block 11: Status / Work (applicable for release after maintenance): Repaired: "Rectification of wear, deterioration or defect(s)..." This definition should include the former "Retreaded", which has been cancelled. Reassembled: The CAA CZ is not familiar with the reasons for the cancellation of this status. Our experts would appreciate an information on which of the remaining statuses should be used for this purpose. The CAA CZ recommends to include a new category of performed work: "Reconditioned: Restoration of service and/or shelf life of not used but (partially) life time expired items."
response	*Noted* 1) Not Accepted The agency recognised that the use of the acronym "ARC" in the explanatory notes of the NPA could create confusion with existing acronym used for other rules. Instead of the acronym, the wording "EASA Form 1" is used consistently throughout the rules. 2) Noted Whenever possible and applicable, similar text is used for appendices to Part-21, Part-145 and Part-M. All remaining differences are justified. Inconsistencies between the EASA Form 1 in the NPA will be corrected. 3) Not Accepted Due to the introduction of the computer generated EASA Form 1, the Agency moved away from the concept of "original/copy". The correlation

must now be established between the Certificate and the item(s). The originator must retain a Certificate in a form that allows verification of the original data.

4) Not Accepted
Using the EASA Form 1 as a log book is not in accordance with the EASA rules. The control of Ads, service life hours etc. is not the obligation of the 145-Maintenance Organisation but the Part-M CAMO.

5) Not Accepted
Block 10: The requirement of the serial number was harmonized with the requirements of the US-FAA. Any other non-required serial number is possible; however correlation between the item and the EASA Form 1 needs to be physically established: a batch number is not therefore considered appropriate but may be entered in block 12.
Block 11: Generic terms to be entered in this block are harmonised with the FAA. Enter only one of the terms that most accurately describes the majority of the work performed and/or the status of the article. Then enter the details of the work performed in block 12, should it be "Retreaded", "Reassembled" or "reconditioned".

comment *73* comment by: *Hispano-Suiza*

The completion instructions for EASA Form 1 that are in the existing Part 21 (appendix I) state that an EASA Form 1 is not necessary for releasing standards. These words are important and useful for the users. They should be captured in the modified Part 21 and included in an AMC to create or in the existing GM 21A.307.

response *Not accepted*

It is not acceptable to duplicate information from 21A.307. An EASA Form 1 is not required if standard parts are to be installed.

comment *107* comment by: *Airbus*

Requirements for EASA Form 1 and the completion instructions thereto are appendices to EU Commission regulations.
Different to the JAA Form 1 provisions in the former ACJ materials to JAR-21 and JAR-145, they are to be considered legally binding.
The use of language such as "Please note", "may either be", "but in the case of", "should be", "if appropriate", "etc", "to help facilitate", "preference should be given", "If necessary", "examples are" indicate that there is room for interpretation and, potentially, inconsistent rule application by the competent Authorities.
For binding rules, it is considered necessary to describe all requirements in an unambiguous language and clearly differentiate between requirement and means-of-compliance respectively guidance materials to be published by EASA.

RATIONALE / REASON / JUSTIFICATION:

It is Airbus experience that unambiguous rule language and consequently unequal rule application by Competent Authorities causes confusion and administrative burdens for POA-holders and, with regard to DOA/POA arrangements as required by Part 21.A4(a), for DOA-holders. Already

	today, many suppliers are requesting different data from Airbus as TC holder.
response	*Not accepted* Because of the nature of the instructions, it is not always possible to be that much prescriptive. The general statement of the commenter is recognised. However the text used does not degrade the quality of the completion and does not lead to ambiguity.

TITLE PAGE p. 1

comment	*1* comment by: *B/E Aerospace Leighton Buzzard* Proposed NPA is acceptable
response	*Noted*

A. Explanatory Note - IV. Content of the draft rules - General p. 4-5

comment	*54* comment by: *CAA-NL (IVW)* **General Comment:** The CAA-NL considers the harmonisation and the innovation described in this proposed amendment as a good step forward. However we have the following remark: • A.IV.8. page 5, 2nd bullet: this suggests that there is not a complete harmonisation. In order to avoid acceptance problems it is our idea to describe the differences.
response	*Not accepted* Differences between regulatory systems are not described in our rules. In addition, handling of differences can be part of bilateral agreements.

A. Explanatory Note - IV. Content of the draft rules: Part-M Appendix II - EASA Form 1 Authorised Release Certificate and Part-145 Appendix I - EASA Form 1 Authorised Release Certificate p. 6-8

comment	*9* comment by: *DAO Aviation A/S* We believe that EASA should use this excellent opportunity, where both NPA 2007-08 and this NPA is in play, to re-identify the EASA Form 1 issued by Subpart M(F) shops, so it clearly differs from the Form used by Part-145 shops (e.g. by a another number). This is to prevent confusion and accidental purchase/installation of components from a Subpart F shop, in a commercially operated A/C. I could also imagine that it might create problems in the mutual recognition negotiations of RTS tags between the EASA and TCA/FAA if the

	problem with Form 1's that have different elegibility, is allowed to continue. We sincerely hope that the mutual recognition negotiations are finished as soon possible, because this is one of the major obstacles in the daily work (at least in GA), we encounter. Hence; the EASA should prioritize these negotiations, and refrain from implementing regulations that are profoundly different than the FAA/TCA (such as two almost identical RTS Forms, with different elegibility).
response	*Noted* Instructions from NPA 2007-08 are implemented in the completion of EASA Form 1. In addition, the statement "this is not a release under Part-145" will be introduced for block 12 when the form is released by a Part-M Subpart F organisation.

A. Explanatory Note - IV. Content of the draft rules: Annex II, AMC to Part-145 p. 9-10

comment	*2* comment by: *EASO* The Acronym used in this paragraph 'ARC' is the same as 'ARC' in Part M when they mean different documents. ARC in Part M is 'Airworthiness Review Cerificate' and in NPA ARC is 'Authorised Release Certificate'. Perhaps 'Authorised Release Certificate' should be changed to 'Authorised Release Document' ARD.
response	*Noted* The agency recognised that the use of the acronym "ARC" in the NPA could create confusion with existing acronym used for other rules. Instead of the acronym, the wording "EASA Form 1" is therefore used consistently throughout the rules. The acronym "ARC" was by mistake used in the explanatory note of the NPA.

A. Explanatory Note - IV. Content of the draft rules: Transition Period p. 10

comment	*55* comment by: *CAA-NL (IVW)* **General Comment:** The CAA-NL considers the harmonisation and the innovation described in this proposed amendment as a good step forward. However we have the following remark: • A.IV.28. page 10. One year transition time is rather short. Our suggestion is two years.
response	*Noted* Adoption of the Opinion by the commission will ultimately determine the transition period. Transition period of 1 year is considered appropriate for harmonisation with introduction by the FAA. EASA and FAA will advocate for the same date of entry into force.

A. Explanatory Note - V. Regulatory Impact Assessment - Sectors concerned p. 11

comment 3 comment by: *EASO*

Paragraph 31 does not mention that this NPA also concerns Stockists and distributors of Aircraft Parts.

response *Noted*

By strict definition, Part-M, Part-21 and Part-145 cannot apply to "unregulated" entities. Therefore these are not mentioned in paragraph 31.

A. Explanatory Note - V. Regulatory Impact Assessment - Summary and Final Assessment p. 12

comment 92 comment by: *Rolls-Royce - Chris Rawden*

Recognising that some European manufacturers also release parts under US PAH approval, we request that the timing of the incorporation of the new Form 1 requirements is made consistent with the introduction of the equivalent changes from the FAA. This would be beneficial for two reasons: Firsly, there is less likelihood of confusion when checking import certificates if both sytems are being changed together, and for the manufacturers, the IT systems to create the forms can then be changed once to address both types of Form, since the changes are likely to be common.

response *Noted*

Adoption of the Opinion by the commission will ultimately determine the transition period. Transition period of 1 year is considered appropriate for harmonisation with introduction by the FAA.
EASA and FAA will advocate for the same date of entry into force.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate p. 13

comment 59 comment by: *UK CAA*

Commentor:
UK CAA
Paragraph:
Part 21 Appendix 1
Comment:
Recommend deletion of the need to raise an additional EASA Form1 where the design data has changed from "unapproved" to "approved"

Justification:
FAA has recently introduced a more streamlined system, whereby as soon as an installer has objective evidence that the design data for an 8130-3 marked "conformity" is now approved (i.e. the FAA have issued the STC), then that conformity release becomes valid for installation without the

need for a second 8130-3. The CAA has observed this system on US-manufactured STCs being installed on EU aircraft and recommends that EASA introduce a similar system to eliminate issue of multiple EASA Form 1s for the same items and also in the interests of commonality between the EU and US systems.
Proposed Text:
If adopted, it is recommended that wording be drawn from the applicable FAA Order.

response *Not accepted*

This proposal was not considered in the NPA and therefore the stakeholders did not have the opportunity to comment.
During the review of this comment, it was felt that such a proposal may dilute the concept of "approved data" in the maintenance field because items with a "prototype" status would become acceptable for installation on in service aircraft.
It is recognised that this issue is not harmonised with the FAA.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 1. Purpose and Use p. 13

comment *10* comment by: *BPvL e. V.*

Point1:

Shouldn't it read: exporting instead of importing country?

response *Not accepted*

The requirements from the authorities of the importing country determine the acceptability.
Bilateral agreements may contain specific provisions for acceptance.

comment *28* comment by: *Thales Avionics*

The airworthiness authority of the **importing country** is not known by the holder of a POA.

response *Noted*

It is recognised that the airworthiness authority of the importing country is not always known when the EASA Form 1 is raised. However if the importing country is known, the design data shall be approved by that importing country's authority.

comment *36* comment by: *CAA CZ*

„Declaration of conformity" purpose is not mentioned in the text. Only the purpose of „declaration of airworthiness is stated.

response *Not accepted*

The harmonised text is kept. It is identifying the primary use only. The use for prototype parts is not considered a primary use.

comment	*83* comment by: *Airbus* **Proposal to add:** *At the time the signature is authorized to be placed on EASA Form 1, the person whose signature appears on the form must have access to the item to verify it conforms to Part 21 approved design data and is in condition for safe operation.* **RATIONALE / REASON / JUSTIFICATION:** This aim of this section is to give general rules related to the use of the EASA Form 1. The objective of the NPA is also to harmonize rules with other Aviations Authorities and solve various problems and questions accumulated since last review of this document. Above requirement is clearly mentioned in FAA Order 8130.21F but it is not clearly written elsewhere in EASA Parts 21, M, and 145.
response	*Not accepted* The proposal is too prescriptive. The details of the release of the item with an EASA Form 1 need to be covered in the POA holders approved procedures.

comment	*84* comment by: *Airbus* **To add following text:** This certificate cannot be used for raw material. **RATIONALE / REASON / JUSTIFICATION:** Clarification on the raw material definition and requirement to not use EASA Form1 for release of raw material is planned to be included in Part M and Part 145 but nothing appears on this topic in the Part 21 Similar to Aircraft release for which the certificate is not to be used, the general rule about raw material should be clearly introduced at this stage.
response	*Noted* The objectives of the instructions is to state the use of the EASA Form 1 instead of the restrictions. In AMC and GM to Part-21, Decision 2007/12/R, it is clarified that manufacturers of raw material are not eligible for POA authorisation, and therefore no EASA Form 1 will be issued.

comment	*91* comment by: *Rolls-Royce - Chris Rawden* The original version of the Purpose and Scope section of Appendix 1 makes reference to the primary purpose of the certificate as both the release of new products parts and appliances, or to release maintenance work carried out on items under the approval of the Competent Authority. We have always assumed this second reason to relate to Part 21 POA privileges to carry out maintenance activity on new products after release, but before the operational requirements (eg JAR-OPS etc) become applicable. This second purpose (release of POA maintenance work)is an

	important one, and we recommend it is retained in this explanation, as the proposed simplified text appears biased towards original release of newly-manufactured items.
response	*Not accepted* The referred second part of the original sentence was related to maintenance releases of items. This is covered in the completion instructions of Part-145 and Part-M. It should not be interpreted as a secondary use of the EASA Form 1 for production. The privilege for a POA to perform maintenance work on complete aircraft (21A.163(d)) is released with an EASA Form 53.

comment	*98* comment by: *Airbus* First sentence says: "A primary purpose of the Certificate is to declare the airworthiness of new aviation products, parts and appliances (hereafter referred to as 'item(s)')." **Proposal**: Replace "declare the airworthiness" by "certify the airworthiness". . **RATIONALE / REASON / JUSTIFICATION:** Declaration of airworthiness should be replaced because the Status PROTOTYPE in Block 11 does not declare the airworthiness
response	*Not accepted* The text is kept for harmonisation reasons.

comment	*105* comment by: *DGAC France* Modify the introduction paragraph as follows : "These instructions relate only to the use of the EASA Form 1 for production purposes. Attention is drawn to Appendix I to Part-145 **and Appendix II to Part-M** which covers the use of the EASA Form 1 for maintenance purposes."
response	*Accepted*

comment	*106* comment by: *DGAC France* Completion Instructions, 1. Purpose and use: • In the first paragraph it should be noted that if according Part 21A.165(c)(2) Form 1 is used to "certify airworthiness", according Part 21A.165(c)(3) it is also used "as a conformity certificate". • In the second paragraph it could be useful to remind that when a part is sold to some dealer who then sends the part to other dealers in the world, the importing country is not always known by the person signing the form1. It is only known for costly parts that are not "on the shelf" and are just built when ordered by a known

customer. The user/installer responsibility statement at the back of Form One reminds that these certificates do not automatically consitute authority to install.

- The requirement to attach the form1 certificate to the component itself has been removed. We can understand that it is to take into consideration electronic certificates. However there should a statement that when the certificate is nota ttached to the component there shall be a clear correlation btween the component and the certificate.

response

Partially accepted

1st bullet: Not Accepted
The harmonised text is kept. It is identifying the primary use only. The use for prototype parts is not considered a primary use.

2nd bullet point: Noted
It is recognised that the airworthiness authority of the importing country is not always known when the EASA Form 1 is raised. However if the importing country is known, the design data shall be approved by that importing country's authority.

3rd bullet point: Partially Accepted
A statement about the clear correlation has been added to the general instructions of the EASA Form 1 (see §1: Purpose and use).

resulting text

Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 2. General Format p. 13-14

comment

85 comment by: *Airbus*

Pages 13, 20 and 26 of 49 §2 GENERAL FORMAT

We suggest to modify

"Please note that the User/Installer responsibility statement can be placed on the reverse or on the front by reducing the depth of the certificate"

by

The User/Installer responsibility statement can be placed on either side of the form.

Consequently, the template of EASA form 1 provided pages 18, 24 and 30 of 49 should show the User/Installer responsibility statement and the front page with above sentence at the bottom of the page.

Pages 19, 25 and 31 of 49 should be removed.

RATIONALE / REASON / JUSTIFICATION:

	On FAA 8130-3 form the User/Installer responsibility statement is basically placed on the front page and presented like a box. Even if it is not a numbered box, this presentation has the advantage to show that statement is part of the form like box 2 for the title of the document, and the option is to put the statement on the reverse side. With the NPA like it is today is seems that it is contrary to FAA rules: basic rule is statement on the reverse side with the template form presented pages 18-19, 24-25 and 30-31, and option to put statement on the cover side. Having all mandatory data on the same page simplifies the copy process and prevent any lack in the technical records (e.g. case of batch breakdown). If justified, for industrial constraints and associated costs linked to above form change it could be proposed an additional delay for transition period with application of the new EASA form1 template.
response	*Accepted* The EASA Form 1 will show the user/installer instructions on the front of the Form. Both are however accepted.

comment	*93* comment by: *Rolls-Royce - Chris Rawden* The term 'unrecognizable' appears to be a US spelling. Is this appropriate in a European document?
response	*Not accepted* Both "s" and "z" are acceptable for UK English.

comment	*122* comment by: *FAA* **Suggested revision for Part-21 Appendix I; 2. General Format; 3rd paragraph, page 13:** "Please note that the User/Installer responsibility statements ~~can~~ **may** be placed on the reverse or on the front by reducing the depth of the Certificate." The word "**may**" is more correct here, as it signifies an authorization by the authority to do this action. The FAA will also use the word "may" in Order 8130.21.
response	*Accepted*

comment	*123* comment by: *FAA* **Suggested Revision for Part-21 Appendix I; 2. General Format; 9th paragraph, page 14:** Add the following sentence to the existing text: "The space remaining on the reverse side of the Certificate may be used by the originator for any

additional information, but not include any certification statement. **Any use of the reverse side of the Certificate must be referenced in the appropriate block on the front side of the Certificate."**

Putting a reference on the front side of the Certificate to any information contained on the back of the Certificate (or on an additional sheet) helps to prevent the loss of that information when making copies, etc. This suggested revision also conforms more closely to the existing instructions in Block 12, Remarks, which also require a reference if additional information is put elsewhere.

FAA will also use this text in Order 8130.21.

response *Accepted*

Harmonised with the FAA.

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 3. Copies p. 14

comment *62* comment by: *Hispano-Suiza*

The two first phrases do not refer to the copies and should be placed in section 2.

response *Accepted*

It is considered essential for the understanding of the use of the EASA Form 1 that there should be:

- A clear correlation between the EASA form 1 and the item,
- Secondly, in case of doubt the originator has the original data.

This information is therefore transferred from the paragraph "Copies" to "Purpose and use".

comment *86* comment by: *Airbus*

Loss of EASA Form 1 should also be addressed. It is proposed to add a new paragraph 5 after paragraph 4, as follows:

5. LOSS OF EASA FORM 1

a) EASA Form 1 may be reissued by authorized persons.

b) If a copy of EASA Form 1 is requested by the original recipient, a file copy of the original form should be provided, if available. Otherwise, a new form will be issued in accordance with present document and the words "THIS EASA FORM 1 REPLACES THE LOST EASA FORM 1 DATED {enter original issuance date}" entered in block 12. The current date is entered in block 13e for airworthiness approval. The replacement form must have an original signature and the same data lost EASA Form 1.

c) If the reissuer is confident that the item status has changed since the original EASA Form 1 issuance, the item must be returned to the original

issuer for inspection/testing before a replacement EASA Form 1 may be issued in accordance with present document.

RATIONALE / REASON / JUSTIFICATION:

In case of loss of the EASA Form 1, today the only possibility for a customer who has lost the authorized release certificate and needs to get another certificate is to send the item back to the originator or to a maintenance organization.
With paragraph 3 the sentence that states "there is no restriction in the number of copies of the certificate sent to the customer" may be understood that in case of lost of the EASA Form 1, the originator could reissue, on customer request, original certificate without restriction.

Above proposed text is in accordance with the FAA order 8130-21F content.

response *Not accepted*

Instead of creating a new paragraph for lost certificates, the current paragraph for copies is considered appropriate. The FAA order will be changed to become harmonised.

comment *94* comment by: *Rolls-Royce - Chris Rawden*

Recognising the intent of this NPA is to address the use of electronic Forms 1, the requirements also still need to address signed, paper originals. The proposed text does not appear to require the POA to send the original Form 1 to the end-user. Is this no longer a requirement?

response *Noted*

Correlation must be established between the item and the Form. The instructions will not require that a Form is "attached" to the item. FAA order will be amended in that sense.

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 4. Error(s) on a Certificate p. 14

comment *39* comment by: *Air France - Maintenance Quality Assurance*

In the first sentence, read:"If an end user finds an error(s) on a Certificate, he (she) must ..." in lieu of "... they must..."

response *Not accepted*

It is kept as it stands for consistency (harmonisation with FAA). "They" refers to the organisation.

comment *96* comment by: *Rolls-Royce - Chris Rawden*

This is a useful addition to the instructions.

response	*Noted*

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator p. 14

comment	*95* comment by: *Rolls-Royce - Chris Rawden* The original text in this section made it clear that a entry needs to be made in each Block (unless otherwise indicated) or the certificate to be valid. Assuming this is still the requirement, we recommend this instruction is added into the proposed text.
response	*Not accepted* It is not accepted because there are specific instructions for each block.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 4 Organisation Name and Address p. 14

comment	*29* comment by: *Thales Avionics* It is understood that address of the manufacturing facility will no longer be entered.
response	*Noted* Using the POA holder address from EASA Form 55 Sheet A in block 4 is required because this POA is responsible for the quality system including applicable production facilities and suppliers. It is recognised that these instructions are not harmonised with the FAA.

comment	*108* comment by: *DGAC France* We consider that the former completion instructions for block 4 were more comprehensive and useful than the proposed one, in particular concerning place of release.
response	*Noted* Simplifying completion was the driver for this. In the end the manufacturing facility should be traceable within the quality system of the manufacturer.

comment	*118* comment by: *Rolls-Royce - Chris Rawden* Where a POA identifies more than one manufacturing facility or site address, the existing requirement is to identify in Block 4 the manufacturing facility address from which the item has been released. The explanatory notes for the NPA identify that the identification of two addresses (which under existing rules are entered if a site other than those on the POA certificate is used) was not necessary, which is

	understood, but the existing text does not make it clear whether the single address required is the general HQ address of the POA holder, or the address (whether on the certificate or not) of the individual POA facility. Can this be clarified?
response	*Partially accepted* It is required to put the POA holder address from EASA Form 55 Sheet A in block 4. A reference to EASA Form 55 Sheet A has been added.

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 5 Work Order/Contract/Invoice p. 14

comment	*109* comment by: *DGAC France* The purpose of the form 1 is to trace a part. It was mentionned before the "batch number". DGAC France believes it is helpfull and shall be kept and recommand to keep the previous text.
response	*Not accepted* The requirement of the serial number was harmonized with the requirements of the US-FAA. Any other non-required serial number is possible; however correlation between the item and the EASA Form 1 needs to be physically established: a batch number is not therefore considered appropriate but may be entered in block 12. Also refer to the newly introduced AMC to the completion instructions of block 12.

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 6 Item p. 14

comment	*101* comment by: *Airbus* Add following sentence: It is permissible to use a separate listing cross-referring Certificate and list to each other. **RATIONALE / REASON / JUSTIFICATION:** In some cases, there is a need to refer to a separate listing.
response	*Not accepted* Referencing from block 6 would result in virtually empty EASA Form 1. This is not considered acceptable for traceability reasons. This policy is harmonised with the FAA.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 7 Description p. 15

comment	*110* comment by: *DGAC France* The list could be completed with CMM
response	*Accepted* The example of the CMM is considered an appropriate example, and is added.

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 8 Part Number p. 15

comment	*87* comment by: *Airbus* We propose addition of the following text: In the case of a kit, PNR, quantity and serial number as applicable should be described either in block 12 or on a kit content list/bill of material attached to the EASA Form 1. If kit list attached to an EASA Form 1 is used the form tracking number identified in block 3 of the EASA Form 1 should be written on it. **RATIONALE / REASON / JUSTIFICATION:** From past experience the kit content delivered could be different from the kit list identified on the maintenance data (alternate P/N, different quantity), or could be incomplete. The P/N that appear on the items that compose the kit cannot be mentioned in block 8. The kit list or bill of material is generally a standard list and the kit content delivered could be different for kit having the same P/N. That is the reason why cross reference between EASA Form 1 and its associated kit list is necessary. Above rules are most of the time the standard practice of the manufacturers.
response	*Not accepted* If the assembly of items (like a SB-kit) has a unique P/N, this can be used on the form to establish correlation between the item(s) and the EASA Form 1. It is allowed to enter the kit number as it appears on the packaging. Any further reference to attached kit lists can be made in block 12. This constitutes an easy reference between the certificate and the kit. New GM 21A.163(c).will be introduced for this use of "assembly" P/N.

comment	*111* comment by: *DGAC France* The existing instructions include a "preference to use P/N from IPC". It is an helpfull recommandation that does not harm to be kept.
response	*Not accepted* The requirement highlights that the P/N as it appears on the item correlates with the P/N on the EASA Form 1.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 9 Quantity p. 15

comment	*115* comment by: *Rolls-Royce - Chris Rawden* The deletion of the Eligibility block (the former Block 9) is welcome, but has thereafter changed the numbers of the following blocks. An alternate solution would be to allow the blocks to retain their original titles, but print "N/A" or similar in the space in Block 9. This is, I understand, currently acceptable to the FAA. We recommend this solution is used. This would make for a smoother introduction of the change, as the existing blocks would retain their current meaning, and would reduce the systems burden to implement the change. Alternately, if the re-numbering of the blocks is seen as a necesity, we suggest that incorporation of N/A in Block 9 should be allowable until the FAA have also published the requirement to delete the block from the 8130-3 form, to harmonise the introduction of the change.
response	*Not accepted* The option to leave block 9 empty was discussed in the drafting group. In paragraph 33 of the Regulatory Impact Assessment the rationale to change the form is provided. Both EASA and the FAA will introduce a release form without the former block 9 "eligibility".

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 10 Serial Number p. 15

comment	*63* comment by: *Hispano-Suiza* I propose to improve the completion rule by adding words similar to those used for part number: "may be also entered. Serial Number as they appear on the item or tag/packaging should be entered."
response	*Not accepted* The requirement of the serial number was harmonized with the requirements of the US-FAA. Although it may improve traceability, entering any non required serial number is not mandated as a requirement.

comment *88* comment by: *Airbus*

We suggest addition of the following text:

If batch number is considered useful information by the manufacturer, this information can be written. In order to avoid confusion with serial number, the word "Batch" will be written before the batch number.

Accordingly, replace
"If there is no serial identified on an item, enter N/A"
by
"**If there is no serial or batch number identified, enter N/A"**

RATIONALE / REASON / JUSTIFICATION:

This change could lead to a reduction of safety and/or additional costs.

The batch number was taken into consideration in the past. By removal of the possibility to record this data it will no more be possible to have any traceability of the batch delivered or received.
In case of problem identified on a particular batch no possibility to identify and segregate them.

response *Not accepted*

The requirement of the serial number was harmonized with the requirements of the US-FAA. Any other non-required serial number is possible; however correlation between the item and the EASA Form 1 needs to be physically established: a batch number is not therefore considered appropriate but may be entered in block 12.
Also refer to the newly introduced GM 21A.163(c). to the completion instructions of block 12.

comment *112* comment by: *DGAC France*

Same as block 5 with regard to batch numbers.

response *Not accepted*

The former completion instructions for block 5 are not kept because of the harmonised policy with the FAA regarding batch numbers that are not to be entered in the new block no 10 "serial number". Also refer to the newly introduced AMC to the completion instructions of block 12.

comment *121* comment by: *Rolls-Royce - Chris Rawden*

The discretion allowed for a POA holder to decide whether to enter a serial number in the block is welcome, but under normal circumstances, a POA may not know whether the item has a serial number because of a regulatory requirement (and therefore must be entered in the block), or for a number of other reasons, eg internal manufacturing traceability or post-delivery service tracking (and therefore may be entered in the block). Although many POA holders may choose to record serial numbers when they are required by the design or manufacturing data, regardless of the reason, if the POA needs to know whether the serial number is there for regulatory reasons, then shouldn't the reason for serialisation of parts be included in the data passed between DOA and POA under the

	arrangements in 21A.4 and 21A.133 (b) and (c)? If so, the GM/AMC for 21A.133 (b) and (c) needs to refer to it.
response	*Not accepted* It is considered good practice to put the serial number in block 10 that is identified on the item as defined in the design or manufacturing data for traceability. Although there is only a requirement for serial numbers for critical parts in accordance with 21A.805, it is not acceptable to put emphasis on only this minimum requirement in the AMC when the design and manufacturers have determined additional needs for traceability.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 11 Status/Work p. 15

comment	*20* comment by: *AEROCONSEIL* The term "new" is confusing for us. It could be interpreted as "a just designed part" not as "an already installed and approved part." "Manufactured" seemed more convenient. Moreover by using only two status "prototype" and "new" what is the avantage of this status compared to the block 13a "approved" and "non-approved"? Actually, prototype will always be associated with "non-approved design data" box and new with "approved design data" box. We do not understand which information is given by this status.
response	*Noted* It is correct for production that the status "new" or "prototype" in this block will always be associated with either "approved" or "non-approved" data statements in block 13a. It is redundant for production; however block 11 is also kept to identify the options for maintenance.

comment	*37* comment by: *CAA CZ* A rectification, modification, inspection or other work is performed after completed production process does not automatically mean that the product has been released previously (as may be interpreted from "Details of the original release and the alteration or rectification work.... "). For instance, in case of long storage of a product at stores of the manufacturer, EASA Form One has not been issued yet, because the product has not been delivered to the customer. In this case it is necessary to record the performed additional work to EASA Form One, but it is not possible to enter the date of an original release. Apart from "Original release" we therefore suggest to define more general term, which also includes "completion of manufacture".
response	*Not accepted* An EASA Form 1 is only necessary when an item leaves the controlled production environment. If the item has received an EASA Form 1 it must

be assumed that it leaves the control of the originator of the Form. If later it leaves that controlled environment again, it needs to be re-certified.

comment *66* comment by: *Hispano-Suiza*

For status "NEW", bullet no. 2 should refer to "applicable standard" for certification after alteration or rectification work, as it is written for Part M (see page 22).

For status "NEW", bullet no. 3 is ambiguous. Can an organisation that re-certifies an item be different form the one that issued the original EASA Form 1 ?

"PROTOTYPE": To keep a text consistent, precise that the following statement must be entered in block 12 "Not eligible on in-service type certificated aircraft."

response *Not accepted*

1st statement **Not Accepted**
This should not be confused with maintenance practices because this refers to design data.

2nd statement. **Accepted**
Recertification from prototype to new is permitted by either the Product manufacturer or the originator of the "prototype" items' EASA Form 1.

3rd statement **Noted**
This is already mentioned in the completion instructions for block 12.

comment *89* comment by: *Airbus*

The wording *"prior to entry into service"* used in paragraph 2 under the term *" New"*, is not explicit.
A definition should be provided.

RATIONALE / REASON / JUSTIFICATION:

May we consider acceptable under the term "prior to entry into service" a part that has left the POA organization, been delivered to a customer, stored for a few weeks or months by the customer or any third party and not yet installed on a aircraft?

According to a definition, the POA in charge of the EASA Form 1 issuance may develop an appropriate procedure. Without any clarification all POA may have their own interpretation and big differences may appear between companies. This could lead to different level of safety approach and not a fair competition.

response *Not accepted*

Although the statement "*prior to entry into service*" is not explicit for all cases, the general intend that an item has not been used in service is considered adequate.

Due to the wide range of cases, it is left to the POA' responsibilities to determine under its approved procedures whether a part is considered to

have remained in the controlled environment and whether it can be re-released as "new".

comment *90* comment by: *Airbus*

We suggest modification of the last sentence in paragraph 2 as follows:

"*Details of the original release and the alteration or rectification work are to be entered in block 12,"* or copy of original EASA Form 1 may be provided.

We suggest modification of the last sentence in paragraph 4 as follows:

"*An explanation of the basis of release and details of the original release are to be entered in block 12,"* or copy of original EASA Form 1 may be provided.

RATIONALE / REASON / JUSTIFICATION:

Providing copy of original release certificate could simplify the process of EASA Form 1 issuance.

From experience it appears that some part manufacturers are writing in block 13 only the tracking number of the original certificate. This cannot be considered details of original release.

response *Not accepted*

It is not sufficient to provide a copy or original of the original release without reference to that release in block 12. The statement in block 12 should always provide the information to determine the status of the items released by the EASA Form 1.

comment *124* comment by: *FAA*

Suggested Revision for Part-21 Appendix I; 5. Completion of the Certificate by the Originator, Block 11 Status/Work, 3rd paragraph, 3, page 15:

Add the word "only" to the paragraph as follows: "3. Re-certification by the organization identified in block 4 of the previous Certificate of items from "prototype" (conformity **only** to non-approved data) to "new" (conformity to approved data and in a condition for safe operation), ...

Typing error/omission. The word "only" was part of the original harmonized text. The word "only" is also included in the same wording for Block 12, Remarks, as the second example of conditions which would necessitate a statement in Block 12.

response *Accepted*

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 12 Remarks p. 15-16

comment	*6* comment by: *AEROCONSEIL* As STC designer, we meet a configuration which is not describe in Part 21 and associated AMC/GM. We design and certify an aircraft modification installation kit P/N "A" (prototype B737 for example). Sometimes we could install the same kit P/N "A" for another type of aircraft (B757 for example). In order to validate the modification on the new A/C type, it is necessary to install the "approved" kit on a prototype aircraft for the new type. **Question 1 : In that case shall we use the status "prototype" or "new"?** **Question 2 : What must we note in block 12?** The P/N is "approved" but not for this type of aircraft (block 9 deleted). Could you propose a text for those cases ? For example : Although the modification is approved under EASA approval n° EASA.A.S.XXXXX on d/m/y, the kit P/N xxx has never been installed on A/C, therefore installation on a prototype A/C is required.
response	*Noted* Installation is not part of the EASA Form 1. The EASA Form 1 should show if the kit has been produced to approved or non-approved design data. The block 12 should contain that design data status information. In this particular case it is therefore produced in accordance with approved design data and can be released under the status "new". Nevertheless, the release does not constitute authority to install the item.

comment	*7* comment by: *AEROCONSEIL* **Could you indicate a standard statement** which give "any information either or by reference to supporting documentation necessary fot the user or installer to determine the airworthiness of the item". Because lot of POA with who we subcontract do not indicate the STC reference nor the certification documentation for prototype aircraft. For example : Part approved under EASA approval n° EASA.A.S.XXXXX on d/m/y. Part approval is pending the certification process with EASA under DOA approval ref. EASA.21J.039 (Top Level Document: *name* ref. xxx dated xxx).
response	*Partially accepted* Block 12 must be used to specify the design data used for production of the items. The wording has been changed to improve this. The reference to the (S)TC should only be entered in case of Products. Additional GM 21A.163(c) is introduced to clarify which data should be considered.

comment	*67* comment by: *Hispano-Suiza* The examples should be completed with "modification standard" to cover the case 2.
response	*Not accepted* It is not considered appropriate to develop a list of examples at the level of the completion instruction. Instead guidance material will be provided. "Modification status" is used instead "modification standard".

comment	*81* comment by: *AEROCONSEIL* Could you detail the conditions to be added for hardware delivered with downloaded software and/or Databases (when the Hardware P/N does not include the software / databse P/N).
response	*Not accepted* A list of examples will not be included in the completion instructions. The general requirement is to provide <u>any</u> information necessary for the user installer to determine the airworthiness of the item in block 12. The issues related to software are addressed in new GM 21A.163(c) to block 8 of the completion instructions.

comment	*97* comment by: *Airbus* We suggest addition of the following underlined text to the first bullet: Maintenance documentation used, including the revision status <u>for all work performed and not limited to the entry made in block 11</u> **RATIONALE / REASON / JUSTIFICATION:** As the entry in block 11 is limited to one term, it could be understood that the statement in block 12 could be limited to this entry; In order to avoid any misunderstanding it seems preferable to clarify.
response	*Noted* This comment is made to block 12 entries on page 28 of the NPA (Maintenance) and is not related to these instructions for production.

comment	*103* comment by: *Airbus* We propose to add <u>underlined</u> and to remove ~~strikethrough~~ text in second bullet : RE-CERTIFICATION OF ITEMS FROM "PROTOTYPE" TO "NEW": THIS DOCUMENT CERTIFIES THE APPROVAL OF THE DESIGN DATA [INSERT <u>RELEVANT REFERENCE, SUCH AS</u> TC/STC NUMBER, REVISION LEVEL, <u>or CHANGE APPROVAL IDENTIFICATION DATA]</u>, ~~DATED [INSERT DATE],~~ TO WHICH THIS ITEM (THESE ITEMS) WAS (WERE) MANUFACTURED. **RATIONALE / REASON / JUSTIFICATION:**

	The list of design data is not exhaustive (eg: changes which are initiated by modification after TC are not reflected here) The approval date can be traced by the design approval data as requested. An explicit Day/Month/Year information is expected to cause a lot of errors and may be not easily available to suppliers.
response	*Partially accepted* Supposing the data is unambiguously traceable the date itself may not be needed. So text should read "DATED [INSERT DATE IF NECESSARY FOR IDENTIFICATION OF REVISION STATUS]".

comment	*104* comment by: *Airbus* Shelf life data: specify what information is expected. **RATIONALE / REASON / JUSTIFICATION:** This would facilitate to have a common understanding on the type of data required (eg Manufacturing date).
response	*Not accepted* A list of examples will not be included in the completion instructions. The general requirement is to provide <u>any</u> information necessary for the user installer to determine the airworthiness of the item in block 12. The issues related to shelf life are addressed in new GM 21A.163(c).

comment	*113* comment by: *DGAC France* For ETSO articles it would be useful to mention whether the information to be provided is the ETSO number or the EASA ETSO authorisation reference.
response	*Noted* Both EASA and the FAA require to enter the (E)TSO number.

comment	*119* comment by: *Rolls-Royce - Chris Rawden* We note that the examples of items that could be discussed in Block 12 (formerly Block 13) has been greatly reduced. Can you confirm that the items removed from the current list to form the new text are now not required to be discussed in Block 12 (formerly 13)? If not, then we suggest some clarity has been lost of the level and type of information expected in this block. Will the removed detail or advice be added to GM/AMC? We also refer to our earlier request regarding the timing of the EASA changes with the equivalent FAA changes to aid incorporation/understanding.
response	*Noted*

A list of examples will not be re-introduced in the completion instructions.
The general requirement is to provide any information necessary for the user installer to determine the airworthiness of the item in block 12.
The more detailed information is addressed in new GM 21A.163(c).

comment *125* comment by: *FAA*

Suggested Revision for Part-21 Appendix I; 5. Completion of the Certificate by the Originator, Block 12 Remarks, page 16:

Add the following text to the statement in the first example of a condition which would necessitate a statement in Block 12:

- When the Certificate is used for prototype purposes the following statement must be entered at the beginning of Block 12:

NOT ELIGIBLE FOR INSTALLATION ON IN-SERVICE TYPE-CERTIFICATED AIRCRAFT**; AIRCRAFT ENGINES, OR PROPELLERS.**

Aircraft engines and propellers are also type-certificated. Text is more correct.

response *Not accepted*

Engines and propellers are not "in-service" by them selves. Therefore these will not be added. The FAA has accepted to keep the current wording, and will also not amend the statement in the FAA order 8130.21.

comment *128* comment by: *Rolls-Royce - Chris Rawden*

Where the certificate is raised to correct errors on a previously-issued certificate, the standard form of words provided in the proposed text invites the author to identify the blocks which have been changed. This is sensible, but the detail of the actual changes needs to be decared or referenced on the new certificate. If it is not clear what changes have been made by the issue of the second certificate, it forces the user/installer to check each referenced block to decide what the changes are.

response *Not accepted*

It is considered too detailed to require in all cases to identify the change if it is obvious enough by itself

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 13a p. 16

comment *60* comment by: *UK CAA*

Commentor:

UK CAA
Paragraph:
Part 21 Appendix 1
Comment:
The reference of the Design/Production Interface arrangement should be entered in Block 13. This will provide positive evidence that such an arrangement was in place at the time of release, and also give an immediate start point for the audit trail when the Competent Authority reviews EASA Form 1 releases to ensure validity of the design data.
Justification:
The deletion of the Eligibility block without any compensating evidence for the existence of a design/production interface arrangement may lead to an increase in the number of parts shipped without such an arrangement in place - i.e. bogus parts.
Proposed Text:
Block 13 (Notes)

Add bullet point:-

The reference number of the design/production interface arrangement under 21A.133(b) and 21A.4 by which the production organisation is provided with applicable design data to manufacture the part and which includes, if required, direct delivery authority.

response *Not accepted*

The EASA Form 1 is not the document put in place for traceability of the Design-Production arrangement.

comment *68* comment by: *Hispano-Suiza*

The words "Identify the data in block 12 ..." should be removed into the examples of block 12.

response *Partially accepted*

The entry of the reason for using non-approved design data needs to be entered in block 12. This is added in the instructions, while the instructions for block 13a are kept.

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 13b Authorised Signature p. 16

comment *11* comment by: *BPvL e. V.*

...a unique number identifying the authorized person ~~may~~ must be added

response *Not accepted*

There may not always be such a number depending on company procedures.

comment	*30* comment by: *Thales Avionics* It is understood that the unique number identifying the authorised person could be a control mark that is made available to him by the organisation quality department.
response	*Noted* It is acceptable to use a control mark as long as unique identification is possible.

comment	*136* comment by: *Rolls-Royce - Chris Rawden* The existing text recognises the use of stamps to signify the authorisation of the person signing the certificate. Presumably, the is still permitted? Similarly, the existing text recognises the creation of computer-generated signatures (requiring them to be a likeness of the individual's own signature). The proposed text does not mention these, or the possibility of electronically-generated approvals, and therefore appears inconsistent with other changes in this NPA, and with existing accepted practice.
response	*Noted* It is acceptable to use a stamp as long as unique identification is possible. However it is not required anymore that the computer generated signature should have the representation of the hand written signature. The details of the computer generated signature are provided in AMC 21A.163(c).

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 13c Approval/Authorisation Number p. 16

comment	*12* comment by: *BPvL e. V.* ... this number or reference is issued by ~~the Competent Authority~~ the certified organisation and is stated in the organisation management handbook
response	*Not accepted* The POA approval number is issued by the competent authority. It may not be confused with the personnel number which may be added in block 13b.

comment	*21* comment by: *FR Aviation* Completion instructions for block 13c & for block 14c read the same "Approval/Authorisation Number" however on the sample form, EASA Form 1-issue 2 they read differently, 13c says "Approval/Authorisation Number & 14c says "Certificate/Approval Ref No. For consistency & to provide calarity to organisations that hold both Part 21 G Part 145 & Pt M approvals should it not just say "Approval refererence No" that being the approval reference number issue t o the organisation by the competent

	authority.
response	*Partially accepted* The title of the instructions for block 14c in the appendices for Part-M and Part-145 will be corrected to read Certificate/Approval. The terms are chosen for harmonisation reasons.

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 13e Date (dd/mmm/yyyy) p. 16-17

comment	*13* comment by: *BPvL e. V.* It is good to enter the date with the three first letters for the months , but it would much better, if we can use points instead of dashes between the date or nothing like: (18. OCT. 2007) or (18 OCT 2007). Should the three letters also be in capital letters or only the first one?
response	*Partially accepted* Entries are permitted as long as the day, month and year are conform to the form dd = 2 digit day, mmm = first 3 letters of the month, yyyy = 4 digit year. The instructions and form are altered to reflect this.

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - User/Installer Responsibilities p. 17

comment	*69* comment by: *Hispano-Suiza* Replace "in block(s)" by "in blocks ..." since there are two blocks.
response	*Accepted*

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA FORM 1 AUTHORISED RELEASE CERTIFICATE p. 18

comment	*14* comment by: *BPvL e. V.*

If this document is only for production, why can't we remove the points 14a - 14e completely and use this field for the entry of the text for the user/installer responsibilities?

We do not have to shade, darken or otherwise mark this field.

response *Not accepted*

The Form is standardised for use in production and maintenance.

comment *57* comment by: *UK CAA*

Commentor:
UK CAA
Paragraph:
Appendix II for Part M guidance
Comment:
The Form 1 Appendix II for Part M approvals pertaining to the completion of boxes 12 and 14a is generic (i.e. is the same as that for Part 145). In being generic it does not clearly state that in the case of Part M, Subpart F releases the box "Other regulation" shall be ticked and the certificate of release to service statement made in block 12.

The CRS statement should state " Certifies that, unless otherwise specified in this block, the work identified in block 11 and described in this block was accomplished in accordance with Part M, Subpart F requirements and in respect to that work the item is considered ready for release to service". The certification statement "unless otherwise specified in this block" is intended to address the following cases.

- (a) Where maintenance could not be completed.
- (b) Where maintenance deviated from the standard required by Part M.
- (c) Where the maintenance was carried out in accordance with a non Part M requirement. In this case block 12 shall specify the particular national regulation.

This information was addressed in NPA 2007-08 (page 129). Without this information the Form may be completed incorrectly.

response *Accepted*

Instructions from NPA 2007-08 are now introduced in the completion of EASA Form 1. In addition, the statement "this is not a release under Part-145" will be introduced for block 12 when the form is released by a Part-M Subpart F organisation.

comment *85* ❖ comment by: *Airbus*

Pages 13, 20 and 26 of 49 §2 GENERAL FORMAT

We suggest to modify

"Please note that the User/Installer responsibility statement can be placed

on the reverse or on the front by reducing the depth of the certificate"

by

The User/Installer responsibility statement can be placed on either side of the form.

Consequently, the template of EASA form 1 provided pages 18, 24 and 30 of 49 should show the User/Installer responsibility statement and the front page with above sentence at the bottom of the page.

Pages 19, 25 and 31 of 49 should be removed.

RATIONALE / REASON / JUSTIFICATION:

On FAA 8130-3 form the User/Installer responsibility statement is basically placed on the front page and presented like a box. Even if it is not a numbered box, this presentation has the advantage to show that statement is part of the form like box 2 for the title of the document, and the option is to put the statement on the reverse side.

With the NPA like it is today is seems that it is contrary to FAA rules: basic rule is statement on the reverse side with the template form presented pages 18-19, 24-25 and 30-31, and option to put statement on the cover side.

Having all mandatory data on the same page simplifies the copy process and prevent any lack in the technical records (e.g. case of batch breakdown).

If justified, for industrial constraints and associated costs linked to above form change it could be proposed an additional delay for transition period with application of the new EASA form1 template.

response *Accepted*

The EASA Form 1 will show the user/installer instructions on the front of the Form. Both are however accepted.

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 1702/2003- Part 21 Appendix I" of this CRD.

B. Draft Opinion (EC) No 1702/2003 - Part-21 Appendix I - EASA FORM 1 AUTHORISED RELEASE CERTIFICATE - User/Installer Responsibilities p. 19

comment *85* ❖ comment by: *Airbus*

Pages 13, 20 and 26 of 49 §2 GENERAL FORMAT

We suggest to modify

"Please note that the User/Installer responsibility statement can be placed on the reverse or on the front by reducing the depth of the certificate"

by

The User/Installer responsibility statement can be placed on either side of the form.

Consequently, the template of EASA form 1 provided pages 18, 24 and 30 of 49 should show the User/Installer responsibility statement and the front page with above sentence at the bottom of the page.

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RATIONALE / REASON / JUSTIFICATION:

On FAA 8130-3 form the User/Installer responsibility statement is basically placed on the front page and presented like a box. Even if it is not a numbered box, this presentation has the advantage to show that statement is part of the form like box 2 for the title of the document, and the option is to put the statement on the reverse side.

With the NPA like it is today is seems that it is contrary to FAA rules: basic rule is statement on the reverse side with the template form presented pages 18-19, 24-25 and 30-31, and option to put statement on the cover side.

Having all mandatory data on the same page simplifies the copy process and prevent any lack in the technical records (e.g. case of batch breakdown).

If justified, for industrial constraints and associated costs linked to above form change it could be proposed an additional delay for transition period with application of the new EASA form1 template.

response

Accepted

The EASA Form 1 will show the user/installer instructions on the front of the Form. Both are however accepted.

resulting text

PART-21 Appendix I

AUTHORISED RELEASE CERTIFICATE – EASA FORM 1

These instructions relate only to the use of the EASA Form 1 for production purposes. Attention is drawn to Appendix I to Part-145 and Appendix II to Part-M which cover the use of the EASA Form 1 for maintenance purposes.

1. PURPOSE AND USE

A primary purpose of the Certificate is to declare the airworthiness of new aviation products, parts and appliances (hereafter referred to as 'item(s)').

Correlation must be established between the Certificate and the item(s). The originator must retain a Certificate in a form that allows verification of the original data.

The Certificate is acceptable to many airworthiness authorities, but may be

dependent on bilateral agreements and/or the policy of the airworthiness authority. The 'approved design data' mentioned in this Certificate then means approved by the airworthiness authority of the importing country.

The Certificate is not a delivery or shipping note.

Aircraft are not to be released using the Certificate.

The Certificate does not constitute approval to install the item on a particular aircraft, engine, or propeller but helps the end user determine its airworthiness approval status.

A mixture of production released and maintenance released items is not permitted on the same Certificate.

A mixture of items certified in conformity with 'approved data' and to 'non-approved data' is not permitted on the same Certificate.

2. GENERAL FORMAT

The Certificate must comply with the format attached including block numbers and the location of each block. The size of each block may however be varied to suit the individual application, but not to the extent that would make the Certificate unrecognizable.

The Certificate must be in 'landscape' format but the overall size may be significantly increased or decreased so long as the Certificate remains recognizable and legible. If in doubt consult the Competent Authority.

The User/Installer responsibility statement can be placed on either side of the form.

All printing must be clear and legible to permit easy reading.

The Certificate may either be pre-printed or computer generated but in either case the printing of lines and characters must be clear and legible and in accordance with the defined format.

The Certificate should be in English, and if appropriate, in one or more other languages.

The details to be entered on the Certificate may be either machine/computer printed or hand-written using block letters and must permit easy reading.

Limit the use of abbreviations to a minimum, to aid clarity.

The space remaining on the reverse side of the Certificate may be used by the originator for any additional information but must not include any certification statement. Any use of the reverse side of the Certificate must be referenced in the appropriate block on the front side of the Certificate

3. COPIES

There is no restriction in the number of copies of the Certificate sent to the customer or retained by the originator.

4. ERROR(S) ON A CERTIFICATE

If an end user finds an error(s) on a Certificate, they must identify it/them in writing to the originator. The originator may issue a new Certificate if they can verify and correct the error(s).

The new Certificate must have a new tracking number, signature and date.

The request for a new Certificate may be honoured without reverification of

the item(s) condition. The new Certificate is not a statement of current condition and should refer to the previous Certificate in block 12 by the following statement; "This Certificate corrects the error(s) in block(s) [enter block(s) corrected] of the Certificate [enter original tracking number] dated [enter original issuance date] and does not cover conformity/condition/release to service". Both Certificates should be retained according to the retention period associated with the first.

5. COMPLETION OF THE CERTIFICATE BY THE ORIGINATOR

Block 1 Approving Competent Authority /Country

State the name and country of the Competent Authority under whose jurisdiction this Certificate is issued. When the Competent Authority is the Agency, only "*EASA*" must be stated.

Block 2 EASA Form 1 header

"AUTHORISED RELEASE CERTIFICATE"
EASA FORM 1

Block 3 Form Tracking Number

Enter the unique number established by the numbering system/procedure of the organisation identified in block 4; this may include alpha/numeric characters.

Block 4 Organisation Name and Address

Enter the full name and address of the production organisation (refer to EASA Form 55 Sheet A) releasing the item(s) covered by this Certificate. Logos, etc., of the organisation are permitted if they can be contained within the block.

Block 5 Work Order/Contract/Invoice

To facilitate customer traceability of the item(s), enter the work order number, contract number, invoice number, or similar reference number.

Block 6 Item

Enter line item numbers when there is more than one line item. This block permits easy cross-referencing to the Remarks block 12.

Block 7 Description

Enter the name or description of the item. Preference should be given to the term used in the instructions for continued airworthiness or maintenance data (e.g. Illustrated Parts Catalogue, Aircraft Maintenance Manual, Service Bulletin, Component Maintenance manual).

Block 8 Part Number

Enter the part number as it appears on the item or tag/packaging. In case of an engine or propeller the type designation may be used.

Block 9 Quantity

State the quantity of items.

Block 10 Serial Number

If the item is required by regulation to be identified with a serial number, enter it here. Additionally, any other serial number not required by regulation may also be entered. If there is no serial number identified on the item, enter "N/A".

Block 11 Status/Work

Enter either "PROTOTYPE" or "NEW".

Enter "PROTOTYPE" for the production of a new item in conformity with non-approved design data.

Enter "NEW" for:

1. The production of a new item in conformity with the approved design data.
2. Re-certification by the organisation identified in block 4 of the previous Certificate after alteration or rectification work on an item, prior to entry into service, (e.g., after incorporation of a design change, correction of a defect, inspection or test, or renewal of shelf life.) Details of the original release and the alteration or rectification work are to be entered in block 12.
3. Re-certification by the Product manufacturer or the organisation identified in block 4 of the previous Certificate of items from "prototype" (conformity only to non-approved data) to "new" (conformity to approved data and in a condition for safe operation), subsequent to approval of the applicable design data, provided that the design data has not changed. The following statement must be entered in block 12:

   RE-CERTIFICATION OF ITEMS FROM "PROTOTYPE" TO "NEW": THIS DOCUMENT CERTIFIES THE APPROVAL OF THE DESIGN DATA [INSERT TC/STC NUMBER, REVISION LEVEL], DATED [INSERT DATE IF NECESSARY FOR IDENTIFICATION OF REVISION STATUS], TO WHICH THIS ITEM (THESE ITEMS) WAS (WERE) MANUFACTURED.

   The box "approved design data and are in a condition for safe operation" should be marked in block 13a.
4. The examination of a previously released new item prior to entry into service:
   - In accordance with a customer-specified standard or specification, details of which and of the original release are to be entered in block 12.
   - To establish airworthiness. An explanation of the basis of release and details of the original release are to be entered in block 12.

Block 12 Remarks

Describe the work identified in Block 11, either directly or by reference to supporting documentation, necessary for the user or installer to determine the airworthiness of item(s) in relation to the work being certified. If necessary, a separate sheet may be used and referenced from the EASA Form 1. Each statement must clearly identify which item(s) in Block 6 it relates to. If there

is no statement, state 'None'.

Enter the justification for release to non-approved design data in block 12 (e.g., pending type-certificate, for test only, pending approved data).

Examples of conditions which would necessitate statements in block 12 are:

- When the Certificate is used for prototype purposes the following statement must be entered at the beginning of block 12:

  'NOT ELIGIBLE FOR INSTALLATION ON IN-SERVICE TYPE-CERTIFICATED AIRCRAFT'.

- Re-certification of items from "prototype" (conformity only to non-approved data) to "new" (conformity to approved data and in a condition for safe operation) once the applicable design data is approved.

  The following statement must be entered in block 12:

  'RE-CERTIFICATION OF ITEMS FROM "PROTOTYPE" TO "NEW": THIS DOCUMENT CERTIFIES THE APPROVAL OF THE DESIGN DATA [INSERT TC/STC NUMBER, REVISION LEVEL], DATED [INSERT DATE IF NECESSARY FOR IDENTIFICATION OF REVISION STATUS], TO WHICH THIS ITEM (THESE ITEMS) WAS (WERE) MANUFACTURED.

- When a new Certificate is issued to correct error(s) the following statement must be entered in block 12:
  'THIS CERTIFICATE CORRECTS THE ERROR(S) IN BLOCK(S) [ENTER BLOCK(S) CORRECTED] OF THE CERTIFICATE [ENTER ORIGINAL TRACKING NUMBER] DATED [ENTER ORIGINAL ISSUANCE DATE] AND DOES NOT COVER CONFORMITY/CONDITION/RELEASE TO SERVICE'.

If printing the data from an electronic EASA Form 1 any data not appropriate in other blocks should be entered in this block.

Block 13a

Mark only one of the two boxes.

(1) Mark the "approved design data and are in a condition for safe operation" box if the item(s) were manufactured using approved design data and found to be in a condition for safe operation.

(2) Mark the "non-approved design data specified in block 12" box if the item(s) were manufactured using applicable non-approved design data. Identify the data in block 12 (e.g., pending type-certificate, for test only, pending approved data).

Mixtures of items released against approved and non-approved design data are not permitted on the same Certificate.

Block 13b Authorised Signature

This space shall be completed with the signature of the authorised person. Only persons specifically authorised under the rules and policies of the Competent Authority are permitted to sign this block. To aid recognition, a unique number identifying the authorised person may be added.

Block 13c Approval/Authorisation Number

Enter the approval/authorisation number/reference. This number or reference is issued by the Competent Authority.

Block 13d Name

Enter the name of the person signing block 13b in a legible form.

Block 13e Date
Enter the date on which block 13b is signed, the date must be in the format dd = 2 digit day, mmm = first 3 letters of the month, yyyy = 4 digit year.

Block 14a-14e

General Requirements for blocks 14a-14e:

Not used for production release. Shade, darken, or otherwise mark to preclude inadvertent or unauthorised use.

User/Installer Responsibilities

Place the following statement on the Certificate to notify end users that they are not relieved of their responsibilities concerning installation and use of any item accompanied by the form:

"This Certificate does not automatically constitute authority to install.

Where the user/installer performs work in accordance with regulations of an airworthiness authority different than the airworthiness authority specified in block 1, it is essential that the user/installer ensures that his/her airworthiness authority accepts items from the airworthiness authority specified in block 1.

Statements in blocks 13a and 14a do not constitute installation certification. In all cases aircraft maintenance records must contain an installation certification issued in accordance with the national regulations by the user/installer before the aircraft may be flown."

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 1. Purpose and Use p. 20

comment *83* ❖ comment by: *Airbus*

Proposal to add:

At the time the signature is authorized to be placed on EASA Form 1, the person whose signature appears on the form must have access to the item to verify it conforms to Part 21 approved design data and is in condition for safe operation.

RATIONALE / REASON / JUSTIFICATION:

This aim of this section is to give general rules related to the use of the EASA Form 1. The objective of the NPA is also to harmonize rules with other Aviations Authorities and solve various problems and questions accumulated since last review of this document.

Above requirement is clearly mentioned in FAA Order 8130.21F but it is

not clearly written elsewhere in EASA Parts 21, M, and 145.

response *Not accepted*

The proposal is too prescriptive. The details of the release of the item with an EASA Form 1 need to be covered in the POA holders approved procedures.

comment *84* ❖ comment by: *Airbus*

To add following text:

This certificate cannot be used for raw material.

RATIONALE / REASON / JUSTIFICATION:

Clarification on the raw material definition and requirement to not use EASA Form1 for release of raw material is planned to be included in Part M and Part 145 but nothing appears on this topic in the Part 21

Similar to Aircraft release for which the certificate is not to be used, the general rule about raw material should be clearly introduced at this stage.

response *Noted*

The objective of the instructions is to state the use of the EASA Form 1 instead of the restrictions.
In AMC and GM to Part-21, Decision 2007/12/R, it is clarified that manufacturers of raw material are not eligible for POA authorisation, and therefore no EASA Form 1 will be issued.

comment *98* ❖ comment by: *Airbus*

First sentence says: "A primary purpose of the Certificate is to declare the airworthiness of new aviation products, parts and appliances (hereafter referred to as 'item(s)')."

Proposal: Replace "declare the airworthiness" by "certify the airworthiness".
.
RATIONALE / REASON / JUSTIFICATION:

Declaration of airworthiness should be replaced because the Status PROTOTYPE in Block 11 does not declare the airworthiness

response *Not accepted*

The text is kept for harmonisation reasons.

comment *114* comment by: *DGAC France*

Completion Instructions, 1. Purpose and use:

- In the second paragraph it could be useful to remind that when a part is sold to some dealer who then sends the part to other dealers in the world, the importing country is not always known by

the person signing the form1. It is only known for costly parts that are not "on the shelf" and are just built when ordered by a known customer. The user/installer responsibility statement at the back of Form One reminds that these certificates do not automatically consitute authority to install.

- The requirement to attach the form1 certificate to the component itself has been removed. We can understand that it is to take into consideration electronic certificates. However there should a statement that when the certificate is not attached to the component there shall be a clear correlation between the component and the certificate.

response

Noted

Noted
It is recognised that the airworthiness authority of the importing country is not always known when the EASA Form 1 is raised. However if the importing country is known, the design data shall be approved by that importing country's authority.
Justification:
Partially Accepted.
A statement about the clear correlation has been added to the general instructions of the EASA Form 1 (See paragraph 1 "Purpose and Use.")

resulting text

Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part M Appendix II" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 2. General Format p. 20

comment

85 ❖ comment by: *Airbus*

Pages 13, 20 and 26 of 49 §2 GENERAL FORMAT

We suggest to modify

"Please note that the User/Installer responsibility statement can be placed on the reverse or on the front by reducing the depth of the certificate"

by

The User/Installer responsibility statement can be placed on either side of the form.

Consequently, the template of EASA form 1 provided pages 18, 24 and 30 of 49 should show the User/Installer responsibility statement and the front page with above sentence at the bottom of the page.

Pages 19, 25 and 31 of 49 should be removed.

RATIONALE / REASON / JUSTIFICATION:

On FAA 8130-3 form the User/Installer responsibility statement is basically placed on the front page and presented like a box. Even if it is

not a numbered box, this presentation has the advantage to show that statement is part of the form like box 2 for the title of the document, and the option is to put the statement on the reverse side.

With the NPA like it is today is seems that it is contrary to FAA rules: basic rule is statement on the reverse side with the template form presented pages 18-19, 24-25 and 30-31, and option to put statement on the cover side.

Having all mandatory data on the same page simplifies the copy process and prevent any lack in the technical records (e.g. case of batch breakdown).

If justified, for industrial constraints and associated costs linked to above form change it could be proposed an additional delay for transition period with application of the new EASA form1 template.

response *Accepted*

The EASA Form 1 will show the user/installer instructions on the front of the Form. Both are however accepted.

comment *126* comment by: *FAA*

1. Suggested Revision for Part-M Appendix II; 2. General Format, 3rd paragraph, page 20:

"Please note that the User/Installer responsibility statements ~~can~~ **may** be placed on the reverse or on the front by reducing the depth of the Certificate."

The word "**may**" is more correct here, as it signifies an authorization by the authority to do this action.

The FAA will also use the word "may" in Order 8130.21.

2. Suggested Revision for Part-M Appendix II; 2. General Format, 9th paragraph, page 20:
Add the following sentence to the existing text: "The space remaining on the reverse side of the Certificate may be used by the originator for any additional information, but not include any certification statement. **Any use of the reverse side of the Certificate must be referenced in the appropriate block on the front side of the Certificate."**

Putting a reference on the front side of the Certificate to any information contained the loss on the back of the Certificate (or on an additional sheet) helps to prevent of that information when making copies, etc. This suggested revision also conforms more closely to the existing instructions in Block 12, Remarks, which also require a reference if additional information is put elsewhere.

FAA will also use this text in Order 8130.21.more

response *Accepted*

Refer to comments 122 and 123.

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part M Appendix II" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 3. Copies p. 20

comment	*86* ❖ comment by: *Airbus* Loss of EASA Form 1 should also be addressed. It is proposed to add a new paragraph 5 after paragraph 4, as follows: 5. LOSS OF EASA FORM 1 a) EASA Form 1 may be reissued by authorized persons. b) If a copy of EASA Form 1 is requested by the original recipient, a file copy of the original form should be provided, if available. Otherwise, a new form will be issued in accordance with present document and the words "THIS EASA FORM 1 REPLACES THE LOST EASA FORM 1 DATED {enter original issuance date}" entered in block 12. The current date is entered in block 13e for airworthiness approval. The replacement form must have an original signature and the same data lost EASA Form 1. c) If the reissuer is confident that the item status has changed since the original EASA Form 1 issuance, the item must be returned to the original issuer for inspection/testing before a replacement EASA Form 1 may be issued in accordance with present document. **RATIONALE / REASON / JUSTIFICATION:** In case of loss of the EASA Form 1, today the only possibility for a customer who has lost the authorized release certificate and needs to get another certificate is to send the item back to the originator or to a maintenance organization. With paragraph 3 the sentence that states "there is no restriction in the number of copies of the certificate sent to the customer" may be understood that in case of lost of the EASA Form 1, the originator could reissue, on customer request, original certificate without restriction. Above proposed text is in accordance with the FAA order 8130-21F content.
response	*Not accepted* Instead of creating a new paragraph for lost certificates, the current paragraph for copies is considered appropriate. The FAA order will be changed to become harmonised.

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part M Appendix II" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the p. 21

Originator - Block 4 Organisation Name and Address

comment	*108* ❖ comment by: *DGAC France* We consider that the former completion instructions for block 4 were more comprehensive and useful than the proposed one, in particular concerning place of release.
response	*Noted* Simplifying completion was the driver for this. In the end the manufacturing facility should be traceable within the quality system of the manufacturer.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 5 Work Order/Contract/Invoice p. 21

comment	*109* ❖ comment by: *DGAC France* The purpose of the form 1 is to trace a part. It was mentionned before the "batch number". DGAC France believes it is helpfull and shall be kept and recommand to keep the previous text.
response	*Not accepted* The requirement of the serial number was harmonized with the requirements of the US-FAA. Any other non-required serial number is possible; however correlation between the item and the EASA Form 1 needs to be physically established: a batch number is not therefore considered appropriate but may be entered in block 12. Also refer to the newly introduced GM to M.A 613 and M.A.802 for the completion instructions of block 12.

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part M Appendix II" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 6 Item p. 21

comment	*101* ❖ comment by: *Airbus* Add following sentence: It is permissible to use a separate listing cross-referring Certificate and list to each other. **RATIONALE / REASON / JUSTIFICATION:** In some cases, there is a need to refer to a separate listing.
response	*Not accepted* Referencing from block 6 would result in virtually empty EASA Form 1.

This is not considered acceptable for traceability reasons. This policy is harmonised with the FAA.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 7 Description p. 21

comment

110 ❖ comment by: *DGAC France*

The list could be completed with CMM

response

Accepted

The example of the CMM is considered an appropriate example, and is added.

resulting text

Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part M Appendix II" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 8 Part Number p. 21

comment

87 ❖ comment by: *Airbus*

We propose addition of the following text:

In the case of a kit, PNR, quantity and serial number as applicable should be described either in block 12 or on a kit content list/bill of material attached to the EASA Form 1.
If kit list attached to an EASA Form 1 is used the form tracking number identified in block 3 of the EASA Form 1 should be written on it.

RATIONALE / REASON / JUSTIFICATION:

From past experience the kit content delivered could be different from the kit list identified on the maintenance data (alternate P/N, different quantity), or could be incomplete.
The P/N that appear on the items that compose the kit cannot be mentioned in block 8.

The kit list or bill of material is generally a standard list and the kit content delivered could be different for kit having the same P/N. That is the reason why cross reference between EASA Form 1 and its associated kit list is necessary.

Above rules are most of the time the standard practice of the manufacturers.

response

Noted

This comment is appropriate for Part-21; refer to new GM 21A.163(c).

comment	*111* ❖ comment by: *DGAC France* The existing instructions include a "preference to use P/N from IPC". It is an helpfull recommandation that does not harm to be kept.
response	*Not accepted* The requirement highlights that the P/N as it appears on the item correlates with the P/N on the EASA Form 1.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 10 Serial Number p. 22

comment	*88* ❖ comment by: *Airbus* We suggest addition of the following text: If batch number is considered useful information by the manufacturer, this information can be written. In order to avoid confusion with serial number, the word "Batch" will be written before the batch number. Accordingly, replace **"If there is no serial identified on an item, enter N/A"** by "**If there is no serial or batch number identified, enter N/A"** **RATIONALE / REASON / JUSTIFICATION:** This change could lead to a reduction of safety and/or additional costs. The batch number was taken into consideration in the past. By removal of the possibility to record this data it will no more be possible to have any traceability of the batch delivered or received. In case of problem identified on a particular batch no possibility to identify and segregate them.
response	*Not accepted* The requirement of the serial number was harmonized with the requirements of the US-FAA. Any other non-required serial number is possible; however correlation between the item and the EASA Form 1 needs to be physically established: a batch number is not therefore considered appropriate but may be entered in block 12. Also refer to the newly introduced GM to M.A 613 and M.A.802 for the completion instructions of block 12.

comment	*112* ❖ comment by: *DGAC France* Same as block 5 with regard to batch numbers.
response	*Not accepted* The former completion instructions for block 5 are not kept because of the harmonised policy with the FAA regarding batch numbers that are not to be entered in the new block no 10 "serial number". Also refer to the new

GM to M.A 613 and M.A.802 for the completion instructions of block 12.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 11 Status/Work p. 22

comment *15* comment by: *BPvL e. V.*

do we have to use the term "overhauled" only for those components, where a component overhaul manual is available or only for components which have a recommended overhaul time, or for every component where I did a major inspection as descriped in the meaning?

response *Noted*

The meaning of "overhauled" is provided in the instructions for block 11; which is not limited to overhaul when defined in the CMM instructions.
A Major Inspection however does not automatically cover the meaning as described for "overhaul" in block 11.

comment *24* comment by: *A.Fischbacher;QM Pilatus Aircraft*

To separate the term "inspected/tested" to "inspected" , or "tested", respectively. Many items can not be tested, only inspected, since there is no functionality, whereas testing would include inspecting.

response *Not accepted*

The first sentence of the completion instructions to block 11 explains that the entry that most accurately describes the majority of the work performed needs to be entered. The accurate details of the work performed must be described in block 12, therefore "inspected/tested" in block 11 is entered, meaning either one or both.

comment *89* ❖ comment by: *Airbus*

The wording *"prior to entry into service"* used in paragraph 2 under the term *" New"*, is not explicit.
A definition should be provided.

RATIONALE / REASON / JUSTIFICATION:

May we consider acceptable under the term "prior to entry into service" a part that has left the POA organization, been delivered to a customer, stored for a few weeks or months by the customer or any third party and not yet installed on a aircraft?

According to a definition, the POA in charge of the EASA Form 1 issuance may develop an appropriate procedure. Without any clarification all POA may have their own interpretation and big differences may appear between companies. This could lead to different level of safety approach and not a fair competition.

response *Not accepted*

Although the statement "*prior to entry into service*" is not explicit for all

cases, the general intend that an item has not been used in service is considered adequate.
Due to the wide range of cases, it is left to the POA' responsibilities to determine under its approved procedures whether a part is considered to have remained in the controlled environment and whether it can be re-released as "new".

comment

90 ❖ comment by: *Airbus*

We suggest modification of the last sentence in paragraph 2 as follows:

"*Details of the original release and the alteration or rectification work are to be entered in block 12,"* or copy of original EASA Form 1 may be provided.

We suggest modification of the last sentence in paragraph 4 as follows:

"*An explanation of the basis of release and details of the original release are to be entered in block 12,"* or copy of original EASA Form 1 may be provided.

RATIONALE / REASON / JUSTIFICATION:

Providing copy of original release certificate could simplify the process of EASA Form 1 issuance.

From experience it appears that some part manufacturers are writing in block 13 only the tracking number of the original certificate. This cannot be considered details of original release.

response

Not accepted

It is not sufficient to provide a copy or original of the original release without reference to that release in block 12. The statement in block 12 should always provide the information to determine the status of the items released by the EASA Form 1.

comment

127 comment by: *FAA*

1. Suggest Revision for Part-M Appendix II; 5. Completion of the Certificate by the Originator, Block 11 Status/Work, Entry: Inspected/Tested, Page 22:

Delete the words "operational checks" in the examples given, so that paragraph reads as follows:
"Inspected/Tested: Examination, measurement, etc. in accordance with an applicable standard* (e.g., visual inspection, functional testing, **and** bench testing ~~and operational checks~~). The results shall be described or referenced in Block 12.

An operational check can be as simple as turning a unit on and off to make sure there is power. Since there are no standards or parameters used for operational checks, we suggest deleting this as an example of "inspected/tested" when returning on item to service.

FAA will also delete the words "operational checks" in Order 8130.21.

2. Suggested Revision for Part-M Appendix II; 5. Completion of the Certificate by the Originator, Block 11 Status/Work, Page 22:

Change the word "norm" to "system" in the definition of applicable standard as follows:

*Applicable standard means a manufacturing/design/maintenance/quality ~~norm~~ **system**, method, technique or practice approved by or acceptable to the Competent Authority.

Quality system is a better descriptor of a standard that is approved or accepted by an Authority.

FAA will also change "norm" to "system" in Order 8130.21.

response *Partially accepted*

The deletion of "operational check" is accepted and harmonised with the FAA. The wording "norm" is not commonly used in the FAA system and is therefore changed. Instead of the FAA proposal to introduce quality system (which has a different meaning in the European regulation) the term "standard" is used by both EASA and FAA.
This is consistent with the current instruction.

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part M Appendix II" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 12 Remarks p. 22

comment *16* comment by: *BPvL e. V.*

It should be clarified, that it is mandotary to add information's about the maintenance documentation including revision status used into block 12. It should also be clarified, that the statement "according to CMM" is not acceptable.

response *Partially accepted*

To preclude "general" references to manuals both revision status and reference are prescribed.

comment *64* comment by: *Hispano-Suiza*

Both CAA and NAA acronyms are used. Replace CAA by NAA.

response *Partially accepted*

Civil Aviation Authority is only kept in block 12, since this is intended for non European countries only. In all other AMC and instructions Competent Authority is used, consistent with European regulations.

comment

97 ❖ comment by: *Airbus*

We suggest addition of the following underlined text to the first bullet:

Maintenance documentation used, including the revision status for all work performed and not limited to the entry made in block 11

RATIONALE / REASON / JUSTIFICATION:

As the entry in block 11 is limited to one term, it could be understood that the statement in block 12 could be limited to this entry;
In order to avoid any misunderstanding it seems preferable to clarify.

response

Partially accepted

This comment is accepted, however introduced in the new GM to M.A 613 and M.A.802.

comment

103 ❖ comment by: *Airbus*

We propose to add underlined and to remove ~~strikethrough~~ text in second bullet :

RE-CERTIFICATION OF ITEMS FROM "PROTOTYPE" TO "NEW": THIS DOCUMENT CERTIFIES THE APPROVAL OF THE DESIGN DATA [INSERT RELEVANT REFERENCE, SUCH AS TC/STC NUMBER, REVISION LEVEL, or CHANGE APPROVAL IDENTIFICATION DATA], ~~DATED [INSERT DATE], TO~~ WHICH THIS ITEM (THESE ITEMS) WAS (WERE) MANUFACTURED.

RATIONALE / REASON / JUSTIFICATION:

The list of design data is not exhaustive (eg: changes which are initiated by modification after TC are not reflected here)

The approval date can be traced by the design approval data as requested. An explicit Day/Month/Year information is expected to cause a lot of errors and may be not easily available to suppliers.

response

Not accepted

The comment provided is applicable to Part-21 Appendix I only.
Therefore removed from the CRD to Part-M Appendix II.

comment

104 ❖ comment by: *Airbus*

Shelf life data: specify what information is expected.

RATIONALE / REASON / JUSTIFICATION:

This would facilitate to have a common understanding on the type of data required (eg Manufacturing date).

response

Not accepted

A list of examples will not be included in the completion instructions.
The general requirement is to provide any information necessary for the

user installer to determine the airworthiness of the item in block 12.
New GM to M.A 613 and M.A.802 is introduced to provide examples of statements to be entered in block 12.

resulting text | Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part M Appendix II" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 13a-13e p. 23

comment *17* comment by: *BPvL e. V.*

if this document is only for maintenance, why can´t we remove the points 13a - 13e completly and use this field for the entry of the text for the user/installer responsibilities?

We do not have to shade, darken or otherwise mark this field.

response *Not accepted*

The Form is standardised for use in production and maintenance.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA FORM 1 AUTHORISED RELEASE CERTIFICATE p. 24

comment *27* comment by: *John E. Crowther, Marshall of Cambridge Aerospace Ltd*

Suggest further review of format to have a single block for signatory, name, reference and date as shown in the example emailed to npa@easa.europa.eu on 27 November 2007, details of which can be seen in the attached file.

response *Not accepted*

Kept for harmonisation reasons.

comment *85* ❖ comment by: *Airbus*

Pages 13, 20 and 26 of 49 §2 GENERAL FORMAT

We suggest to modify

"Please note that the User/Installer responsibility statement can be placed on the reverse or on the front by reducing the depth of the certificate"

by

The User/Installer responsibility statement can be placed on either side of the form.

Consequently, the template of EASA form 1 provided pages 18, 24 and 30 of 49 should show the User/Installer responsibility statement and the

front page with above sentence at the bottom of the page.

Pages 19, 25 and 31 of 49 should be removed.

RATIONALE / REASON / JUSTIFICATION:

On FAA 8130-3 form the User/Installer responsibility statement is basically placed on the front page and presented like a box. Even if it is not a numbered box, this presentation has the advantage to show that statement is part of the form like box 2 for the title of the document, and the option is to put the statement on the reverse side.

With the NPA like it is today is seems that it is contrary to FAA rules: basic rule is statement on the reverse side with the template form presented pages 18-19, 24-25 and 30-31, and option to put statement on the cover side.

Having all mandatory data on the same page simplifies the copy process and prevent any lack in the technical records (e.g. case of batch breakdown).

If justified, for industrial constraints and associated costs linked to above form change it could be proposed an additional delay for transition period with application of the new EASA form1 template.

response

Accepted

The EASA Form 1 will show the user/installer instructions on the front of the Form. Both are however accepted.

resulting text

Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part M Appendix II" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-M Appendix II - EASA FORM 1 AUTHORISED RELEASE CERTIFICATE - User/Installer Responsibilities p. 25

comment

85 ❖ comment by: *Airbus*

Pages 13, 20 and 26 of 49 §2 GENERAL FORMAT

We suggest to modify

"Please note that the User/Installer responsibility statement can be placed on the reverse or on the front by reducing the depth of the certificate"

by

The User/Installer responsibility statement can be placed on either side of the form.

Consequently, the template of EASA form 1 provided pages 18, 24 and 30 of 49 should show the User/Installer responsibility statement and the front page with above sentence at the bottom of the page.

	Pages 19, 25 and 31 of 49 should be removed. **RATIONALE / REASON / JUSTIFICATION:** On FAA 8130-3 form the User/Installer responsibility statement is basically placed on the front page and presented like a box. Even if it is not a numbered box, this presentation has the advantage to show that statement is part of the form like box 2 for the title of the document, and the option is to put the statement on the reverse side. With the NPA like it is today is seems that it is contrary to FAA rules: basic rule is statement on the reverse side with the template form presented pages 18-19, 24-25 and 30-31, and option to put statement on the cover side. Having all mandatory data on the same page simplifies the copy process and prevent any lack in the technical records (e.g. case of batch breakdown). If justified, for industrial constraints and associated costs linked to above form change it could be proposed an additional delay for transition period with application of the new EASA form1 template.
response	*Accepted* The EASA Form 1 will show the user/installer instructions on the front of the Form. Both are however accepted.

resulting text

PART-M Appendix II

AUTHORISED RELEASE CERTIFICATE – EASA FORM 1

These instructions relate only to the use of the EASA Form 1 for maintenance purposes. Attention is drawn to (Appendix I to Part-21) which cover the use of the EASA Form 1 for production purposes.

1. PURPOSE AND USE

A primary purpose of the Certificate is to declare the airworthiness of maintenance work undertaken on products, parts and appliances (hereafter referred to as 'item(s)').

Correlation must be established between the Certificate and the item(s). The originator must retain a Certificate in a form that allows verification of the original data.

The Certificate is acceptable to many airworthiness authorities, but may be dependent on bilateral agreements and/or the policy of the airworthiness authority. The 'approved design data' mentioned in this Certificate then means approved by the airworthiness authority of the importing country.

The Certificate is not a delivery or shipping note.

Aircraft are not to be released using the Certificate.

The Certificate does not constitute approval to install the item on a particular aircraft, engine, or propeller but helps the end user determine its airworthiness approval status.

A mixture of production released and maintenance released items is not permitted on the same Certificate.

2. GENERAL FORMAT

The Certificate must comply with the format attached including block numbers and the location of each block. The size of each block may however be varied to suit the individual application, but not to the extent that would make the Certificate unrecognisable.

The Certificate must be in 'landscape' format but the overall size may be significantly increased or decreased so long as the Certificate remains recognisable and legible. If in doubt consult the Competent Authority.

The User/Installer responsibility statement can be placed on either side of the form.

All printing must be clear and legible to permit easy reading.

The Certificate may either be pre-printed or computer generated but in either case the printing of lines and characters must be clear and legible and in accordance with the defined format.

The Certificate should be in English, and if appropriate, in one or more other languages.

The details to be entered on the Certificate may be either machine/computer printed or hand-written using block letters and must permit easy reading.

Limit the use of abbreviations to a minimum, to aid clarity.

The space remaining on the reverse side of the Certificate may be used by the originator for any additional information but must not include any certification statement. Any use of the reverse side of the Certificate must be referenced in the appropriate block on the front side of the Certificate

3. COPIES

If a copy of an EASA Form 1 is requested, a file copy of the original form may be provided by an authorized person, if available. There is no restriction in the number of copies of the Certificate sent to the customer or retained by the originator.

4. ERROR(S) ON A CERTIFICATE

If an end user finds an error(s) on a Certificate, they must identify it/them in writing to the originator. The originator may issue a new Certificate if they can verify and correct the error(s).

The new Certificate must have a new tracking number, signature and date.

The request for a new Certificate may be honoured without reverification of the item(s) condition. The new Certificate is not a statement of current condition and should refer to the previous Certificate in block 12 by the following statement; "This Certificate corrects the error(s) in block(s) [enter block(s) corrected] of the Certificate [enter original tracking number] dated [enter original issuance date] and does not cover conformity/condition/release to service". Both Certificates should be retained according to the retention period associated with the first.

5. COMPLETION OF THE CERTIFICATE BY THE ORIGINATOR

Block 1 Approving Competent Authority /Country

State the name and country of the Competent Authority under whose jurisdiction this Certificate is issued.

Block 2 EASA Form 1 header

"AUTHORISED RELEASE CERTIFICATE"
EASA FORM 1

Block 3 Form Tracking Number

Enter the unique number established by the numbering system/procedure of the organisation identified in block 4; this may include alpha/numeric characters.

Block 4 Organisation Name and Address

Enter the full name and address of the approved organisation (refer to EASA form 3) releasing the work covered by this Certificate. Logos, etc., are permitted if the logo can be contained within the block.

Block 5 Work Order/Contract/Invoice

To facilitate customer traceability of the item(s), enter the work order number, contract number, invoice number, or similar reference number.

Block 6 Item

Enter line item numbers when there is more than one line item. This block permits easy cross-referencing to the Remarks block 12.

Block 7 Description

Enter the name or description of the item. Preference should be given to the term used in the instructions for continued airworthiness or maintenance data (e.g. Illustrated Parts Catalogue, Aircraft Maintenance Manual, Service Bulletin, Component Maintenance Manual).

Block 8 Part Number

Enter the part number as it appears on the item or tag/packaging. In case of an engine or propeller the type designation may be used.

Block 9 Quantity

State the quantity of items.

Block 10 Serial Number

If the item is required by regulations to be identified with a serial number, enter it here. Additionally, any other serial number not required by regulation may also be entered. If there is no serial number identified on the item, enter "N/A".

Block 11 Status/Work

The following table 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.

Entry	Meaning
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.
Repaired	Rectification of defect(s) using an applicable standard.*
Inspected/Tested	Examination, measurement, etc. in accordance with an applicable standard* (e.g. visual inspection, functional testing, bench testing etc.).
Modified	Alteration of an item to conform to an applicable standard.*

* Applicable standard means a manufacturing/design/maintenance/quality standard, method, technique or practice approved by or acceptable to the Competent Authority. The Applicable Standard shall be described in block 12.

Block 12 Remarks

Describe the work identified in Block 11, either directly or by reference to supporting documentation, necessary for the user or installer to determine the airworthiness of item(s) in relation to the work being certified. If necessary, a separate sheet may be used and referenced from the main EASA Form 1. Each statement must clearly identify which item(s) in Block 6 it relates to.

Examples of information to be entered in block 12 are:

- Maintenance data used, including the revision status and reference.
- Compliance with airworthiness directives or service bulletins.
- Repairs carried out.
- Modifications carried out.
- Replacement parts installed.
- Life limited parts status.
- Deviations from the customer work order.
- Release statements to satisfy a foreign Civil Aviation Authority maintenance requirement.
- Information needed to support shipment with shortages or re-assembly after delivery.
- The M.A.613 certificate of release to service statement:

"THE WORK IDENTIFIED IN BLOCK 11 AND DESCRIBED IN THIS BLOCK WAS ACCOMPLISHED IN ACCORDANCE WITH PART-M,

SUBPART F REQUIREMENTS.

THE ITEM(S) ARE CONSIDERED READY FOR RELEASE TO SERVICE". THIS IS NOT A RELEASE UNDER PART 145.

If printing the data from an electronic EASA Form 1 any data not appropriate in other blocks should be entered in this block.

Block 13a-13e

General Requirements for blocks 13a-13e:

Not used for maintenance release. Shade, darken, or otherwise mark to preclude inadvertent or unauthorised use.

Block 14a

Mark the appropriate box(es) indicating which regulations apply to the completed work. If the box "other regulations specified in block 12" is marked, then the regulations of the other airworthiness authority(ies) must be identified in block 12. At least one box must be marked, or both boxes may be marked, as appropriate.

For all maintenance by M.A. Subpart F approved maintenance organisations the box "other regulation specified in this block shall be ticked and the certificate of release to service statement made in block 12.

The certification statement "unless otherwise specified in this block" is intended to address the following cases;
(a) Where the maintenance could not be completed.
(b) Where the maintenance deviated from the standard required by Part-M.
(c) Where the maintenance was carried out in accordance with a non Part-M requirement. In this case block 12 shall specify the particular national regulation.

Block 14b Authorised Signature

This space shall be completed with the signature of the authorised person. Only persons specifically authorised under the rules and policies of the Competent Authority are permitted to sign this block. To aid recognition, a unique number identifying the authorised person may be added.

Block 14c Certificate/Approval Number

Enter the Certificate/Approval number/reference. This number or reference is issued by the Competent Authority.

Block 14d Name

Enter the name of the person signing block 14b in a legible form.

Block 14e Date

Enter the date on which block 13b is signed, the date must be in the format dd = 2 digit day, mmm = first 3 letters of the month, yyyy = 4 digit year

User/Installer Responsibilities

Place the following statement on the Certificate to notify end users that they are not relieved of their responsibilities concerning installation and use of any item accompanied by the form:

"This Certificate does not automatically constitute authority to install.

Where the user/installer performs work in accordance with regulations of an airworthiness authority different than the airworthiness authority specified in block 1, it is essential that the user/installer ensures that his/her airworthiness authority accepts items from the airworthiness authority specified in block 1.

Statements in blocks 13a and 14a do not constitute installation certification. In all cases aircraft maintenance records must contain an installation certification issued in accordance with the national regulations by the user/installer before the aircraft may be flown."

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 1. Purpose and Use p. 26

comment *31* comment by: *Thales Avionics*

The airworthiness authority of the **importing country** is not known by the holder of a MOA

response *Noted*

It is recognised that the airworthiness authority of the importing country is not always known when the EASA Form 1 is raised. However if the importing country is known, the design data shall be approved by that importing country's authority.

comment *82* comment by: *KLM Royal Dutch Airlines*

The sentence "the certificate does not constitute approval.....determine it airworthiness approval status." is not clear, as it suggests that 'installation approval' is dependent on the 'airworthiness status' only.

Please remove the part: "but helps the end user determine its airworthiness approval status.", as this is sufficiently clear from the first line in this paragraph 1, Purpose and use.

response *Not accepted*

The second part of this sentence is kept to highlight the use of the form.

comment *83* ❖ comment by: *Airbus*

Proposal to add:

At the time the signature is authorized to be placed on EASA Form 1, the person whose signature appears on the form must have access to the item to verify it conforms to Part 21 approved design data and is in condition for safe operation.

RATIONALE / REASON / JUSTIFICATION:

This aim of this section is to give general rules related to the use of the EASA Form 1. The objective of the NPA is also to harmonize rules with other Aviations Authorities and solve various problems and questions accumulated since last review of this document.

Above requirement is clearly mentioned in FAA Order 8130.21F but it is not clearly written elsewhere in EASA Parts 21, M, and 145.

response *Not accepted*

The proposal is too prescriptive. The details of the release of the item with an EASA Form 1 need to be covered in the POA holders approved procedures.

comment *84* ❖ comment by: *Airbus*

To add following text:

This certificate cannot be used for raw material.

RATIONALE / REASON / JUSTIFICATION:

Clarification on the raw material definition and requirement to not use EASA Form1 for release of raw material is planned to be included in Part M and Part 145 but nothing appears on this topic in the Part 21

Similar to Aircraft release for which the certificate is not to be used, the general rule about raw material should be clearly introduced at this stage.

response *Noted*

The objectives of the instructions is to state the use of the EASA Form 1 instead of the restrictions.
In AMC and GM to Part-21, Decision 2007/12/R, it is clarified that manufacturers of raw material are not eligible for POA authorisation, and therefore no EASA Form 1 will be issued.

comment *98* ❖ comment by: *Airbus*

First sentence says: "A primary purpose of the Certificate is to declare the airworthiness of new aviation products, parts and appliances (hereafter referred to as 'item(s)')."

Proposal:
Replace "declare the airworthiness" by "certify the airworthiness".
.
RATIONALE / REASON / JUSTIFICATION:

Declaration of airworthiness should be replaced because the Status PROTOTYPE in Block 11 does not declare the airworthiness

response *Not accepted*

The text is kept for harmonisation reasons.

comment *114* ❖ comment by: *DGAC France*

Completion Instructions, 1. Purpose and use:

- In the second paragraph it could be useful to remind that when a part is sold to some dealer who then sends the part to other dealers in the world, the importing country is not always known by the person signing the form1. It is only known for costly parts that are not "on the shelf" and are just built when ordered by a known customer. The user/installer responsibility statement at the back of Form One reminds that these certificates do not automatically consitute authority to install.
- The requirement to attach the form1 certificate to the component itself has been removed. We can understand that it is to take into consideration electronic certificates. However there should a statement that when the certificate is not attached to the component there shall be a clear correlation between the component and the certificate.

response *Noted*

Noted
The comment made can be true. However if the importing country is known, the design data shall be approved by that importing country's authority.
Justification:
Partially Accepted.
A statement about the clear correlation has been added to the general instructions of the EASA Form 1 (See paragraph 1 "Purpose and Use.")

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part 145 Appendix I" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 2. General Format p. 26

comment *85* ❖ comment by: *Airbus*

Pages 13, 20 and 26 of 49 §2 GENERAL FORMAT

We suggest to modify

"Please note that the User/Installer responsibility statement can be placed on the reverse or on the front by reducing the depth of the certificate"

by

The User/Installer responsibility statement can be placed on either side of the form.

Consequently, the template of EASA form 1 provided pages 18, 24 and 30 of 49 should show the User/Installer responsibility statement and the front page with above sentence at the bottom of the page.

Pages 19, 25 and 31 of 49 should be removed.

RATIONALE / REASON / JUSTIFICATION:

On FAA 8130-3 form the User/Installer responsibility statement is basically placed on the front page and presented like a box. Even if it is not a numbered box, this presentation has the advantage to show that statement is part of the form like box 2 for the title of the document, and the option is to put the statement on the reverse side.

With the NPA like it is today is seems that it is contrary to FAA rules: basic rule is statement on the reverse side with the template form presented pages 18-19, 24-25 and 30-31, and option to put statement on the cover side.

Having all mandatory data on the same page simplifies the copy process and prevent any lack in the technical records (e.g. case of batch breakdown).

If justified, for industrial constraints and associated costs linked to above form change it could be proposed an additional delay for transition period with application of the new EASA form1 template.

response *Accepted*

The EASA Form 1 will show the user/installer instructions on the front of the Form. Both are however accepted.

comment *129* comment by: *FAA*

1. Suggested Revision to Part-145 Appendix 1; 2. General Format, 3rd paragraph, Page 26:
"Please note that the User/Installer responsibility statements ~~can~~ **may** be placed on the reverse or on the front by reducing the depth of the Certificate."

The word "**may**" is more correct here, as it signifies an authorization by the authority to do this action.

The FAA will also use the word "may" in Order 8130.21.

2. Suggested Revision to Part-145 Appendix 1; 2. General Format, 9th paragraph, Page 26:

Add the following sentence to the existing text: "The space remaining on the reverse side of the Certificate may be used by the originator for any additional information, but not include any certification statement. **Any use of the reverse side of the Certificate must be referenced in the appropriate block on the front side of the Certificate."**

Putting a reference on the front side of the Certificate to any information contained on the back of the Certificate (or on an additional sheet) helps to prevent the loss of that information when making copies, etc. This suggested revision also conforms more closely to the existing instructions in Block 12, Remarks, which also require a reference if additional information is put elsewhere.

FAA will also use this text in Order 8130.21.

response | *Accepted*

Harmonised with the FAA.

resulting text | Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part 145 Appendix I" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 3. Copies p. 26

comment | *86* ❖ comment by: *Airbus*

Loss of EASA Form 1 should also be addressed. It is proposed to add a new paragraph 5 after paragraph 4, as follows:

5. LOSS OF EASA FORM 1

a) EASA Form 1 may be reissued by authorized persons.

b) If a copy of EASA Form 1 is requested by the original recipient, a file copy of the original form should be provided, if available. Otherwise, a new form will be issued in accordance with present document and the words "THIS EASA FORM 1 REPLACES THE LOST EASA FORM 1 DATED {enter original issuance date}" entered in block 12. The current date is entered in block 13e for airworthiness approval. The replacement form must have an original signature and the same data lost EASA Form 1.

c) If the reissuer is confident that the item status has changed since the original EASA Form 1 issuance, the item must be returned to the original issuer for inspection/testing before a replacement EASA Form 1 may be issued in accordance with present document.

RATIONALE / REASON / JUSTIFICATION:

In case of loss of the EASA Form 1, today the only possibility for a customer who has lost the authorized release certificate and needs to get another certificate is to send the item back to the originator or to a maintenance organization.
With paragraph 3 the sentence that states "there is no restriction in the number of copies of the certificate sent to the customer" may be understood that in case of lost of the EASA Form 1, the originator could reissue, on customer request, original certificate without restriction.

Above proposed text is in accordance with the FAA order 8130-21F content.

response | *Not accepted*

Instead of creating a new paragraph for lost certificates, the current paragraph for copies is considered appropriate. The FAA order will be changed to become harmonised.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the p. 27

Originator - Block 4 Organisation Name and Address

comment *32* comment by: *Thales Avionics*

It is understood that address of the manufacturing facility will no longer be entered.

response *Noted*

Since this comment is entered to the instructions for Part-M, it is understood that this could be intended to the maintenance organisations address.
In that case the Maintenance organisation holder address mentioned on the EASA Form 3 should be entered in block 4 of the EASA Form 1.
Reference to EASA Form 3 has been added in block 4.
It is recognised that these instructions are not harmonised with the FAA.

comment *108* ❖ comment by: *DGAC France*

We consider that the former completion instructions for block 4 were more comprehensive and useful than the proposed one, in particular concerning place of release.

response *Noted*

Simplifying completion was the driver for this. In the end the manufacturing facility should be traceable within the quality system of the manufacturer.

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part 145 Appendix I" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 5 Work Order/Contract/Invoice p. 27

comment *109* ❖ comment by: *DGAC France*

The purpose of the form 1 is to trace a part. It was mentionned before the "batch number". DGAC France believes it is helpfull and shall be kept and recommand to keep the previous text.

response *Not accepted*

The requirement of the serial number was harmonized with the requirements of the US-FAA. Any other non-required serial number is possible; however correlation between the item and the EASA Form 1 needs to be physically established: a batch number is not therefore considered appropriate but may be entered in block 12. Also refer to the newly introduced GM 145.A.50(d) for the completion instructions of block 12.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form p. 27

1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 6 Item

comment 101 ❖ comment by: *Airbus*

Add following sentence: It is permissible to use a separate listing cross-referring Certificate and list to each other.

RATIONALE / REASON / JUSTIFICATION:

In some cases, there is a need to refer to a separate listing.

response *Not accepted*

Referencing from block 6 would result in virtually empty EASA Form 1. This is not considered acceptable for traceability reasons. This policy is harmonised with the FAA.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 7 Description p. 27

comment 110 ❖ comment by: *DGAC France*

The list could be completed with CMM

response *Accepted*

The example of the CMM is considered an appropriate example, and is added.

resulting text: Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part 145 Appendix I" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 8 Part Number p. 27

comment 87 ❖ comment by: *Airbus*

We propose addition of the following text:

In the case of a kit, PNR, quantity and serial number as applicable should be described either in block 12 or on a kit content list/bill of material attached to the EASA Form 1.
If kit list attached to an EASA Form 1 is used the form tracking number identified in block 3 of the EASA Form 1 should be written on it.

RATIONALE / REASON / JUSTIFICATION:

From past experience the kit content delivered could be different from the kit list identified on the maintenance data (alternate P/N, different quantity), or could be incomplete.

	The P/N that appear on the items that compose the kit cannot be mentioned in block 8. The kit list or bill of material is generally a standard list and the kit content delivered could be different for kit having the same P/N. That is the reason why cross reference between EASA Form 1 and its associated kit list is necessary. Above rules are most of the time the standard practice of the manufacturers.
response	*Noted* This comment is appropriate for Part-21; refer to new GM 21A.163(c).

comment	*111* ❖ comment by: *DGAC France* The existing instructions include a "preference to use P/N from IPC". It is an helpfull recommandation that does not harm to be kept.
response	*Not accepted* The requirement highlights that the P/N as it appears on the item correlates with the P/N on the EASA Form 1.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 10 Serial Number p. 27-28

comment	*88* ❖ comment by: *Airbus* We suggest addition of the following text: If batch number is considered useful information by the manufacturer, this information can be written. In order to avoid confusion with serial number, the word "Batch" will be written before the batch number. Accordingly, replace **"If there is no serial identified on an item, enter N/A"** by "**If there is no serial or batch number identified, enter N/A"** **RATIONALE / REASON / JUSTIFICATION:** This change could lead to a reduction of safety and/or additional costs. The batch number was taken into consideration in the past. By removal of the possibility to record this data it will no more be possible to have any traceability of the batch delivered or received. In case of problem identified on a particular batch no possibility to identify and segregate them.
response	*Not accepted* The requirement of the serial number was harmonized with the requirements of the US-FAA. Any other non-required serial number is

possible; however correlation between the item and the EASA Form 1 needs to be physically established: a batch number is not therefore considered appropriate but may be entered in block 12. Also refer to the newly introduced GM 145.A.50(d) for the completion instructions of block 12.

comment *112* ❖ comment by: *DGAC France*

Same as block 5 with regard to batch numbers.

response *Not accepted*

The former completion instructions for block 5 are not kept because of the harmonised policy with the FAA regarding batch numbers that are not to be entered in the new block no 10 "serial number". Also refer to the new GM 145.A.50(d) for the completion instructions of block 12.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 11 Status/Work p. 28

comment *22* comment by: *KLM Royal Dutch Airlines*

The current entry "Inspected/tested" in the table in the description of Block 11 is confusing.
Although AMC 145.A.50(a)2.4 clearly shows that the entries can be made independently, many people, also within EASA authorities, do not accept this and require that "Inspection/tested" is used as a single, indivisible entry.
Therefore, please change the entry "Inspected/tested" to: "Inspected" or "Tested" and clearly state that these terms may be used independently.

response *Not accepted*

The first sentence of the completion instructions to block 11 explains that the entry that most accurately describes the majority of the work performed needs to be entered. The accurate details of the work performed must be described in block 12, therefore "inspected/tested" in block 11 is entered, meaning either one or both.

comment *25* comment by: *A.Fischbacher;QM Pilatus Aircraft*

To separate the term "inspected/tested" to "inspected" , or "tested", respectively. Many items can not be tested, only inspected, since there is no functionality, whereas testing would include inspecting.

response *Not accepted*

The first sentence of the completion instructions to block 11 explains that the entry that most accurately describes the majority of the work performed needs to be entered. The accurate details of the work performed must be described in block 12, therefore "inspected/tested" in block 11 is entered, meaning either one or both.

comment *89* ❖ comment by: *Airbus*

The wording *"prior to entry into service"* used in paragraph 2 under the term *" New"*, is not explicit.
A definition should be provided.

RATIONALE / REASON / JUSTIFICATION:

May we consider acceptable under the term "prior to entry into service" a part that has left the POA organization, been delivered to a customer, stored for a few weeks or months by the customer or any third party and not yet installed on a aircraft?

According to a definition, the POA in charge of the EASA Form 1 issuance may develop an appropriate procedure. Without any clarification all POA may have their own interpretation and big differences may appear between companies. This could lead to different level of safety approach and not a fair competition.

response *Not accepted*

Although the statement "*prior to entry into service*" is not explicit for all cases, the general intend that an item has not been used in service is considered adequate.
Due to the wide range of cases, it is left to the POA' responsibilities to determine under its approved procedures whether a part is considered to have remained in the controlled environment and whether it can be re-released as "new".

comment *90* ❖ comment by: *Airbus*

We suggest modification of the last sentence in paragraph 2 as follows:

"*Details of the original release and the alteration or rectification work are to be entered in block 12,"* or copy of original EASA Form 1 may be provided.

We suggest modification of the last sentence in paragraph 4 as follows:

"*An explanation of the basis of release and details of the original release are to be entered in block 12,"* or copy of original EASA Form 1 may be provided.

RATIONALE / REASON / JUSTIFICATION:

Providing copy of original release certificate could simplify the process of EASA Form 1 issuance.

From experience it appears that some part manufacturers are writing in block 13 only the tracking number of the original certificate. This cannot be considered details of original release.

response *Not accepted*

It is not sufficient to provide a copy or original of the original release without reference to that release in block 12. The statement in block 12 should always provide the information to determine the status of the

items released by the EASA Form 1.

comment

131 comment by: *FAA*

1. Suggested Revision to Part-145 Appendix 1; 5. Completion of the Certificate by the Originator, Block 11 Status/Work Entry: Inspected/Tested, Page 28:

Delete the words "operational checks" in the examples given, so that paragraph reads as follows:

"Inspected/Tested: Examination, measurement, etc. in accordance with an applicable standard* (e.g., visual inspection, functional testing, **and** bench testing ~~and operational checks~~). The results shall be described or referenced in Block 12.

An operational check can be as simple as turning a unit on and off to make sure there is power. Since there are no standards or parameters used for operational checks, we suggest deleting this as an example of "inspected/tested" when returning on item to service.

FAA will also delete the words "operational checks" in Order 8130.21.

2. Part-145 Appendix 1; 5. Completion of the Certificate by the Originator, Block 11 Status/Work, Page 28:

Change the word "norm" to "system" in the definition of applicable standard as follows:

* Applicable standard means a manufacturing/design/maintenance/quality ~~norm~~ **system**, method, technique or practice approved by or acceptable to the Competent Authority.

Quality <u>system</u> is a better descriptor of a standard that is approved or accepted by an Authority.

FAA will also change "norm" to "system" in Order 8130.21.

response

Partially accepted

The deletion of "operational check" is accepted and harmonised with the FAA. The wording "norm" is not commonly used in the FAA system and is therefore changed. Instead of the FAA proposal to introduce quality system (which has a different meaning in the European regulation) the term "standard" is used by both EASA and FAA.
This is consistent with the current instruction.

resulting text

Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part 145 Appendix I" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 12 Remarks p. 28

comment	*23* comment by: *KLM Royal Dutch Airlines* Part 145.A.50(a) allows that a CRS is issued once "...all maintenance ordered has been properly carried out..." In case a specific repair on a component has been ordered, the AMO may issue a Form 1 once that repair has been performed, as the instruction for Block 12 clearly describes that a Form 1 constitutes an airworthiness release only "in relation to the work being certified". Such a Form 1 may be misleading, because there is no mechanism which ensures that anyone fully checks the component for further discrepancies: The AMO has completed the work ordered, while the customer may not have realised that he needed to order a full inspection and the installer may not be able to detect a hidden damage in the component. This evidently leaves room to certify incomplete maintenance activities on a Form 1, while the customer may take the Form 1 for a full airworthiness release of the part. An additional indication (e.g. a tickbox) on Form 1 is required in which an AMO can make clear whether or not the component is fully inspected and/or tested and in an airworthy condition.
response	*Not accepted* The operator is ultimately responsible for the airworthiness status of the part according to M.A. 201. This principle has been used since the introduction of JAR-145 in 1991. Moreover in most cases it will be very difficult to certify airworthiness without knowing the full history of a part, which is kept by the owner/operator.

comment	*65* comment by: *Hispano-Suiza* Both CAA and NAA acronyms are used. Replace CAA by NAA.
response	*Partially accepted* Civil Aviation Authority is only kept in block 12, since this is intended for non European countries only. In all other AMC and instructions Competent Authority is used, consistent with European regulations.

comment	*74* comment by: *ZODIAC* Please specify: Examples of staremens in block 12 are: Maintenance documentation used, including the revision status **(issue or date)** *Reason : "issue + date" are redundant information generating errors*
response	*Partially accepted* To preclude "general" references to manuals both revision status and reference are prescribed.

comment	*75* comment by: *ZODIAC*

Examples of statements in block 12 are;
- .....
- Release statements to satisfy a foreign CAA maintenance requirement.

1) Please propose the sentence to be written in the case of dual release (as it is mentioned in the FAA equivalent document: ORDER 8130.21F figure 3.3)
"Certifies work specified in Blocks 11 and 12 was carried out in accordance with *[applicable CAA Part 145]* and, with respect to that work, the component is considered ready for release to service under *[applicable CAA Part 145]* approval number *[XXXXX].*

2) Please specify that no additional signature is required in this case.

response

Not accepted

The EASA rules and completion instructions are intended for use within the European system and do not include specific bilateral agreement issues.

comment

97 ❖ comment by: *Airbus*

We suggest addition of the following underlined text to the first bullet:

Maintenance documentation used, including the revision status <u>for all work performed and not limited to the entry made in block 11</u>

RATIONALE / REASON / JUSTIFICATION:

As the entry in block 11 is limited to one term, it could be understood that the statement in block 12 could be limited to this entry;
In order to avoid any misunderstanding it seems preferable to clarify.

response

Partially accepted

This comment is accepted, however introduced in the new GM 145.A.50(d).

comment

103 ❖ comment by: *Airbus*

We propose to add <u>underlined</u> and to remove ~~strikethrough~~ text in second bullet :

RE-CERTIFICATION OF ITEMS FROM "PROTOTYPE" TO "NEW": THIS DOCUMENT CERTIFIES THE APPROVAL OF THE DESIGN DATA [INSERT <u>RELEVANT REFERENCE, SUCH AS</u> TC/STC NUMBER, REVISION LEVEL, <u>or CHANGE APPROVAL IDENTIFICATION DATA]</u>, ~~DATED [INSERT DATE],~~ TO WHICH THIS ITEM (THESE ITEMS) WAS (WERE) MANUFACTURED.

RATIONALE / REASON / JUSTIFICATION:

The list of design data is not exhaustive (eg: changes which are initiated by modification after TC are not reflected here)

The approval date can be traced by the design approval data as

	requested. An explicit Day/Month/Year information is expected to cause a lot of errors and may be not easily available to suppliers.
response	*Partially accepted* Supposing the data is unambiguously traceable the date itself may not be needed. So text should read "DATED [INSERT DATE IF NECESSARY FOR IDENTIFICATION OF REVISION STATUS]".

comment	*104* ❖ comment by: *Airbus* Shelf life data: specify what information is expected. **RATIONALE / REASON / JUSTIFICATION:** This would facilitate to have a common understanding on the type of data required (eg Manufacturing date).
response	*Not accepted* A list of examples will not be included in the completion instructions. The general requirement is to provide any information necessary for the user installer to determine the airworthiness of the item in block 12. The issues related to shelf life are addressed in newly introduced GM 145.A.50(d).

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part 145 Appendix I" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - Block 14b Authorised Signature p. 29

comment	*34* comment by: *Thales Avionics* It is understood that the unique number identifying the authorised person could be a control mark that is made available to him by the organisation quality department.
response	*Noted* It is acceptable to use a control mark as long as unique identification is possible.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA Form 1 Authorised Release Certificate - 5. Completion of the Certificate by the Originator - User/Installer Responsibilities p. 29

comment	*70* comment by: *Hispano-Suiza* Replace "block(s)" by "blocks" since there are two blocks referred to.
response	*Accepted*

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part 145 Appendix I" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA FORM 1 AUTHORISED RELEASE CERTIFICATE p. 30

comment	*85* ❖ comment by: *Airbus* **Pages 13, 20 and 26 of 49 §2 GENERAL FORMAT** **We suggest to modify** "Please note that the User/Installer responsibility statement can be placed on the reverse or on the front by reducing the depth of the certificate" **by** The User/Installer responsibility statement can be placed on either side of the form. Consequently, the template of EASA form 1 provided pages 18, 24 and 30 of 49 should show the User/Installer responsibility statement and the front page with above sentence at the bottom of the page. Pages 19, 25 and 31 of 49 should be removed. **RATIONALE / REASON / JUSTIFICATION:** On FAA 8130-3 form the User/Installer responsibility statement is basically placed on the front page and presented like a box. Even if it is not a numbered box, this presentation has the advantage to show that statement is part of the form like box 2 for the title of the document, and the option is to put the statement on the reverse side. With the NPA like it is today is seems that it is contrary to FAA rules: basic rule is statement on the reverse side with the template form presented pages 18-19, 24-25 and 30-31, and option to put statement on the cover side. Having all mandatory data on the same page simplifies the copy process and prevent any lack in the technical records (e.g. case of batch breakdown). If justified, for industrial constraints and associated costs linked to above form change it could be proposed an additional delay for transition period with application of the new EASA form1 template.
response	*Accepted* The EASA Form 1 will show the user/installer instructions on the front of the Form. Both are however accepted.

resulting text	Refer for the resulting text at the end of "B. Draft Opinion (EC) No 2042/2003- Part 145 Appendix I" of this CRD.

B. Draft Opinion (EC) No 2042/2003 - Part-145 Appendix I - EASA FORM 1 AUTHORISED RELEASE CERTIFICATE - User/Installer Responsibilities p. 31

comment *85* ❖ comment by: *Airbus*

Pages 13, 20 and 26 of 49 §2 GENERAL FORMAT

We suggest to modify

"Please note that the User/Installer responsibility statement can be placed on the reverse or on the front by reducing the depth of the certificate"

by

The User/Installer responsibility statement can be placed on either side of the form.

Consequently, the template of EASA form 1 provided pages 18, 24 and 30 of 49 should show the User/Installer responsibility statement and the front page with above sentence at the bottom of the page.

Pages 19, 25 and 31 of 49 should be removed.

RATIONALE / REASON / JUSTIFICATION:

On FAA 8130-3 form the User/Installer responsibility statement is basically placed on the front page and presented like a box. Even if it is not a numbered box, this presentation has the advantage to show that statement is part of the form like box 2 for the title of the document, and the option is to put the statement on the reverse side.

With the NPA like it is today is seems that it is contrary to FAA rules: basic rule is statement on the reverse side with the template form presented pages 18-19, 24-25 and 30-31, and option to put statement on the cover side.

Having all mandatory data on the same page simplifies the copy process and prevent any lack in the technical records (e.g. case of batch breakdown).

If justified, for industrial constraints and associated costs linked to above form change it could be proposed an additional delay for transition period with application of the new EASA form1 template.

response *Accepted*

The EASA Form 1 will show the user/installer instructions on the front of the Form. Both are however accepted.

resulting text

PART-145 Appendix I

AUTHORISED RELEASE CERTIFICATE – EASA FORM 1

These instructions relate only to the use of the EASA Form 1 for maintenance purposes. Attention is drawn to (Appendix I to Part-21) which cover the use of the EASA Form 1 for production purposes.

1. PURPOSE AND USE

A primary purpose of the Certificate is to declare the airworthiness of maintenance work undertaken on products, parts and appliances (hereafter referred to as 'item(s)').

Correlation must be established between the Certificate and the item(s). The originator must retain a Certificate in a form that allows verification of the original data.

The Certificate is acceptable to many airworthiness authorities, but may be dependent on bilateral agreements and/or the policy of the airworthiness authority. The 'approved design data' mentioned in this Certificate then means approved by the airworthiness authority of the importing country.

The Certificate is not a delivery or shipping note.

Aircraft are not to be released using the Certificate.

The Certificate does not constitute approval to install the item on a particular aircraft, engine, or propeller but helps the end user determine its airworthiness approval status.

A mixture of production released and maintenance released items is not permitted on the same Certificate.

2. GENERAL FORMAT

The Certificate must comply with the format attached including block numbers and the location of each block. The size of each block may however be varied to suit the individual application, but not to the extent that would make the Certificate unrecognisable.

The Certificate must be in 'landscape' format but the overall size may be significantly increased or decreased so long as the Certificate remains recognisable and legible. If in doubt consult the Competent Authority.

The User/Installer responsibility statement can be placed on either side of the form.

All printing must be clear and legible to permit easy reading.

The Certificate may either be pre-printed or computer generated but in either case the printing of lines and characters must be clear and legible and in accordance with the defined format.

The Certificate should be in English, and if appropriate, in one or more other languages.

The details to be entered on the Certificate may be either machine/computer printed or hand-written using block letters and must permit easy reading.

Limit the use of abbreviations to a minimum, to aid clarity.

The space remaining on the reverse side of the Certificate may be used by the

originator for any additional information but must not include any certification statement. Any use of the reverse side of the Certificate must be referenced in the appropriate block on the front side of the Certificate.

3. COPIES

If a copy of an EASA Form 1 is requested, a file copy of the original form may be provided by an authorized person, if available. There is no restriction in the number of copies of the Certificate sent to the customer or retained by the originator.

4. ERROR(S) ON A CERTIFICATE

If an end user finds an error(s) on a Certificate, they must identify it/them in writing to the originator. The originator may issue a new Certificate if they can verify and correct the error(s).

The new Certificate must have a new tracking number, signature and date.

The request for a new Certificate may be honoured without reverification of the item(s) condition. The new Certificate is not a statement of current condition and should refer to the previous Certificate in block 12 by the following statement; "This Certificate corrects the error(s) in block(s) [enter block(s) corrected] of the Certificate [enter original tracking number] dated [enter original issuance date] and does not cover conformity/condition/release to service". Both Certificates should be retained according to the retention period associated with the first.

5. COMPLETION OF THE CERTIFICATE BY THE ORIGINATOR

Block 1 Approving Competent Authority /Country

State the name and country of the Competent Authority under whose jurisdiction this Certificate is issued.

Block 2 EASA Form 1 header

"AUTHORISED RELEASE CERTIFICATE"
EASA FORM 1

Block 3 Form Tracking Number

Enter the unique number established by the numbering system/procedure of the organisation identified in block 4; this may include alpha/numeric characters.

Block 4 Organisation Name and Address

Enter the full name and address of the approved organisation (refer to EASA form 3) releasing the work covered by this Certificate. Logos, etc., are permitted if the logo can be contained within the block.

Block 5 Work Order/Contract/Invoice

To facilitate customer traceability of the item(s), enter the work order number, contract number, invoice number, or similar reference number.

Block 6 Item

Enter line item numbers when there is more than one line item. This block

permits easy cross-referencing to the Remarks block 12.

Block 7 Description

Enter the name or description of the item. Preference should be given to the term used in the instructions for continued airworthiness or maintenance data (e.g. Illustrated Parts Catalogue, Aircraft Maintenance Manual, Service Bulletin, Component Maintenance Manual).

Block 8 Part Number

Enter the part number as it appears on the item or tag/packaging. In case of an engine or propeller the type designation may be used.

Block 9 Quantity

State the quantity of items.

Block 10 Serial Number

If the item is required by regulations to be identified with a serial number, enter it here. Additionally, any other serial number not required by regulation may also be entered. If there is no serial number identified on the item, enter "N/A".

Block 11 Status/Work

The following table 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.

Entry	Meaning
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.
Repaired	Rectification of defect(s) using an applicable standard.*
Inspected/Tested	Examination, measurement, etc. in accordance with an applicable standard.* (e.g. visual inspection, functional testing, bench testing etc.)
Modified	Alteration of an item to conform to an applicable standard.*

* Applicable standard means a manufacturing/design/maintenance/quality standard, method, technique or practice approved by or acceptable to the Competent Authority. The Applicable Standard shall be described in block 12.

Block 12 Remarks

Describe the work identified in Block 11, either directly or by reference to

supporting documentation, necessary for the user or installer to determine the airworthiness of item(s) in relation to the work being certified. If necessary, a separate sheet may be used and referenced from the main EASA Form 1. Each statement must clearly identify which item(s) in Block 6 it relates to.

Examples of information to be entered in block 12 are;

- Maintenance data used, including the revision status and reference.
- Compliance with airworthiness directives or service bulletins.
- Repairs carried out.
- Modifications carried out.
- Replacement parts installed.
- Life limited parts status.
- Deviations from the customer work order.
- Release statements to satisfy a foreign Civil Aviation Authority maintenance requirement.
- Information needed to support shipment with shortages or re-assembly after delivery.

If printing the data from an electronic EASA Form 1 any data not appropriate in other blocks should be entered in this block.

Block 13a-13e

General Requirements for blocks 13a-13e:

Not used for maintenance release. Shade, darken, or otherwise mark to preclude inadvertent or unauthorised use.

Block 14a

Mark the appropriate box(es) indicating which regulations apply to the completed work. If the box "other regulations specified in block 12" is marked, then the regulations of the other airworthiness authority(ies) must be identified in block 12. At least one box must be marked, or both boxes may be marked, as appropriate.

Block 14b Authorised Signature

This space shall be completed with the signature of the authorised person. Only persons specifically authorised under the rules and policies of the Competent Authority are permitted to sign this block. To aid recognition, a unique number identifying the authorised person may be added.

Block 14c Certificate/Approval Number

Enter the Certificate/Approval number/reference. This number or reference is issued by the Competent Authority.

Block 14d Name

Enter the name of the person signing block 14b in a legible form.

Block 14e Date

Enter the date on which block 13b is signed, the date must be in the format

dd = 2 digit day, mmm = first 3 letters of the month, yyyy = 4 digit year

User/Installer Responsibilities

Place the following statement on the Certificate to notify end users that they are not relieved of their responsibilities concerning installation and use of any item accompanied by the form:

"This Certificate does not automatically constitute authority to install.

Where the user/installer performs work in accordance with regulations of an airworthiness authority different than the airworthiness authority specified in block 1, it is essential that the user/installer ensures that his/her airworthiness authority accepts items from the airworthiness authority specified in block 1.

Statements in blocks 13a and 14a do not constitute installation certification. In all cases aircraft maintenance records must contain an installation certification issued in accordance with the national regulations by the user/installer before the aircraft may be flown."

C. Draft Decision - I. AMC and GM to Part-21 - AMC No 2 to 21A.130(b) - 4. Error(s) on a Certificate p. 32

comment *116* comment by: *DGAC France*

delete text as it is only a repetition of completion instructions and not a supplement

response *Not accepted*

An additional signature from the Authority is required. Therefore this is not the same as for Subpart G.

resulting text: There is no change to the text as proposed for AMC No. 2 to 21A.130(b) in NPA 2007-13.

C. Draft Decision - I. AMC and GM to Part-21 - AMC 21A.163(c) p. 33

comment *56* comment by: *CAA-NL (IVW)*

AMC 21A.163(c)
Computer generated signature and electronic exchange of the EASA Form 1

Needs in general to be more structured, for example:
The electronic system must fulfil security standards such as:

a. confidentiality (ensuring that information is accessible only to those authorised to have access);

b. integrity (safeguarding the accuracy and completeness of information and processing methods); and

c. availability (ensuring that authorised users have access to information

	and associated assets when required. Mention further the specific requirements for above items for persons/authorisations, formats, documents incl. **archiving**, for instance: Ad. a. • guarantee secure access for each certifying staff; • provide for a "personal" signature, identifying the signatory. The signature should be generated only in presence of the signatory Ad. b. • ensure integrity and accuracy of the data certified by the signature of the Form and be able to show evidence of the authenticity of the EASA Form 1(recording and record keeping) with suitable security, safeguards and backups. Etc. Please take also in consideration for auditing purposes ISO/IEC 17799 (expected to be renamed ISO/IEC 27002) or equivalent national standards, since this is an information security standard published by the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC). It is entitled *Information technology - Security techniques - Code of practice for information security management*. If an approved organisation can show compliance with this standard, it makes it probably easier for the surveyor to review the organisation's approaches for securing the information contained in electronic means. **3. Characteristics of the computer signature:** The reason for decribed requirement is not clear. Once the system is approved since it fulfils the requirements, why then still put extra prints like; A watermark-type "PRINTED FROM ELECTRONIC FILE" must be printed on document 13 of the Form?
response	*Not accepted* The majority of the proposals are covered by the AMC. Some suggestions are considered to be too detailed, e. g. "specific requirements for above items for persons/authorisations, formats, documents incl. archiving, ". Additional standards It is already mentioned in the proposal that additional national or EU standards may be applicable. Characteristics of the computer signature: Not accepted The statement is necessary to clearly inform the end user that the document was issued from a computer generated signature system. Any confusion with a form that has been manually released will be not possible. In addition, the text is harmonised with the FAA.

C. Draft Decision - I. AMC and GM to Part-21 - AMC 21A.163(c) - 1. Submission to the Competent Authority p. 33

comment	*41* comment by: *Air France - Maintenance Quality Assurance* In the first sentence, add a " / " after holder and before applicant to read:" Any POA holder / applicant intending ..."
response	*Accepted*

comment	*71* comment by: *Hispano-Suiza* Replace "holder applicant" by "holder/applicant".
response	*Accepted*

comment	*117* comment by: *DGAC France* We propose to end paragraph 1. Submission to the Competent Authority after "exposition" and delete the rest of the sentence. Reference to "airworthiness data" is confusing and no such Part is described in Part 21 or its AMC for the POE.
response	*Accepted*

comment	*141* comment by: *Rolls-Royce - Chris Rawden* Should "POA holder applicant" read "POA holder/applicant" or "POA holder or applicant"?
response	*Accepted* The text is changed to read "POA holder/applicant".

resulting text	Refer for the resulting text at the end of "C. Draft Decision – I. AMC and GM to Part 21 – AMC 21A.163(c)" of this CRD.

C. Draft Decision - I. AMC and GM to Part-21 - AMC 21A.163(c) - 2. Characteristics of the Computer Generated Signature System p. 33

comment	*132* comment by: *FAA* **Suggested Revision to AMC 21A.163(c); 2nd paragraph, Page 33:** Move the parenthetical bracket in the sentence, as follows: **2. Characteristics of the computer generated system** The elements of the system must:

	- - - - provide a high degree of assurance that the data has not been modified after signature (if modification is necessary after issuance, i.e., re-certification of a part, a new form with a new number and reference to the initial issuance should be made**)** Typing error. Need parenthesis at the end of the sentence to complete the "if" phrase "(if modification is necessary.....)"
response	*Accepted* Alco corrected for AMC M.A.613 (b) and AMC No.1 to 145.A.50 (d)

resulting text	Refer for the resulting text at the end of "C. Draft Decision – I. AMC and GM to Part 21 – AMC 21A.163(c)" of this CRD.

C. Draft Decision - I. AMC and GM to Part-21 - AMC 21A.163(c) - 3. Characteristics of the Computer Generated Signature p. 33-34

comment	*102* comment by: *DASSAULT AVIATION Airworthiness Assurance Office* Delete the sentence "A watermark-type 'PRINTED FROM ELECTRONIC FILE' must be printed on document". Indeed, it is a common rule in industry that both originals and copies of paper certificates are accepted. Furthermore, such rule is also proposed in the new AMC 145.A.42(a)(1)(3) of this NPA 2007-13 for paper certificate bearing a signature. So, we consider that it is useless to add a specific watermark-type when printing an EASA Form 1 certificate issued through a computer-generated signature process. The statement "Electronic Signature of File" in block 13b is sufficient to identify such certificate.
response	*Not accepted* The statement is necessary to clearly inform the end user that the document was issued from a computer generated signature system. Any confusion with a form that has been manually released will be not possible. In addition, the text is harmonised with the FAA.

comment	*142* comment by: *Rolls-Royce - Chris Rawden* The definition of a computer-generated signature does not seem consistent with its use in the context of the Form 1. Surely the computer-generated signature is a means to identify the individual who has authorised the Form 1, rather than a means to verify the data's source and accuracy. An automated computer cross-check could be used to verify data's source and accuracy - it's the link to the authorised individual that is important. We suggest this definition (which appears to be a generic definition, possibly drawn from a separate source) is reworded to clarify the point of the computer generated signature.
response	*Noted*

The AMC is reworded to clarify the definition of an electronic signature in the context of this AMC. The definition for the electronic signature is consistent with the definition in the Directive 1999/93/EC of the European Parliament and Council of 13 December 1999 on Community framework for electronic signatures.

comment

143 comment by: *Rolls-Royce - Chris Rawden*

For clarity: "the hand-written signature of the person signing".

Is the use of the term "hand-written" necessary? Isn't a signature hand-written by definition?

response

Not accepted

The use of the term "hand-written" is kept to highlight the differences between the representation of a signature manually performed and any other identification.

resulting text

Refer for the resulting text at the end of "C. Draft Decision – I. AMC and GM to Part 21 – AMC 21A.163(c)" of this CRD.

C. Draft Decision - I. AMC and GM to Part-21 - AMC 21A.163(c) - 4. Electronic Exchange of the Electronic EASA Form 1 p. 34

comment

133 comment by: *FAA*

Suggested Revision to AMC 21A.163(c); 4th paragraph, Page 34:
Revise the text as follows:

4. Electronic exchange of the electronic EASA Form 1

The electronic exchange of the electronic EASA Form 1 **should be accomplished on a voluntary basis.**
.....
As soon as the receiver is not capable of **electronically receiving** the document, the system should **revert back** to the paper system.
.....
When needed for an electronic EASA Form 1 or its exchange, additional data necessary for the electronic format (manufacturer, customer identification code, etc.) may be added to the printed copies of EASA Form 1, **as long as the additional data does not prevent a person from filling out, issuing, printing, or reading any portion of the EASA Form 1.**

Revisions are for clarification of text.

response

Partially accepted

This part of this AMC has been re-drafted; when still applicable, the suggested changes have been incorporated.

comment	*144* comment by: *Rolls-Royce - Chris Rawden* Are a "computer generated signature" and an "electronic signature" the same thing? If they are, we would appreciate just one term to be used in the NPA. If not, we recommend a definition of "electronic signature" is added.
response	*Noted* "Computer generated signature" and "electronic signature" are not the same. This AMC has been re-drafted for clarity and the term "Computer generated signature" is no longer used.

resulting text

The existing AMC 21A.163(c) is replaced by the following new AMC 21A.163(c)

AMC 21A.163(c)
Electronic signature and electronic exchange of the EASA Form 1

1 Submission to the Competent Authority

Any POA holder/applicant intending to implement a electronic signature procedure to issue EASA Form 1 and/or to exchange electronically such data contained on the EASA Form 1, must document it and submit it to the Competent Authority as part of the documents attached with its exposition.

2 Characteristics of the electronic system generating the EASA Form 1

The electronic system must:
- guarantee secure access for each certifying staff;
- ensure integrity and accuracy of the data certified by the signature of the Form and be able to show evidence of the authenticity of the EASA Form 1 (recording and record keeping) with suitable security, safeguards and backups;
- be active only at the location where the part is being released with an EASA Form 1;
- not permit to sign a blank form;
- provide a high degree of assurance that the data has not been modified after signature (if modification is necessary after issuance, i.e., re-certification of a part~~)~~, a new form with a new number and reference to the initial issuance should be made).
- provide for a "personal" electronic signature, identifying the signatory. The signature should be generated only in presence of the signatory.

An electronic signature means data in electronic form which are attached to or logically associated with other electronic data and which serve as a method of authentication and should meet the following criteria
- it is uniquely linked to the signatory;
- it is capable of identifying the signatory;
- it is created using means that the signatory can maintain under his sole control.

An electronic signature is defined as an electronically generated value based on a cryptographic algorithm and appended to data in a way to enable the verification of the data's source and integrity.

POA holders/applicants are reminded that additional national and/or European requirements may need to be satisfied when operating electronic systems. "Directive 1999/93/EC of the European Parliament and of the Council of 13

December 1999 on a Community framework for electronic signatures" may constitute a reference.
The electronic system must be based on a policy and management structure (confidentiality, integrity and availability), such as:

- Administrators, signatories
- Scope of authorisation, rights
- Password and secure access, authentication, protections, confidentiality
- Track changes
- Minimum blocks to be completed, completeness of information
- Archives
- Etc.

The electronic system generating the EASA Form 1 may contain additional data such as;

- Manufacturer code
- Customer identification code
- workshop report
- Inspection results
- etc.

3 Characteristics of the EASA Form 1 generated from the electronic system

To facilitate understanding and acceptance of the EASA Form 1 released with an electronic signature the following statement should be in Block 13b: "Electronic Signature on File".
In addition to this statement, it is accepted to print or display a signature in any form such as a representation of the hand-written signature of the person signing (i.e. scanned signature) or their name.

When printing the electronic form, the EASA Form 1 should meet the general format as specified in Appendix I to Part-21. A watermark-type "PRINTED FROM ELECTRONIC FILE" must be printed on the document.

When the electronic file contains a hyperlink to data, required to determine the airworthiness of the item(s), the data associated to the hyperlink, when printed, should be in a legible format and be identified as a reference from the EASA Form 1.

Additional information not required by the EASA Form 1 completion instructions may be added to the printed copies of EASA Form 1, as long as the additional data do not prevent a person from filling out, issuing, printing, or reading any portion of the EASA Form 1. This additional data should be provided only in block 12 unless it is necessary to include it in another block to clarify the content of that block.

4 Electronic exchange of the electronic EASA Form 1
The electronic exchange of the electronic EASA Form 1 should be accomplished on a voluntary basis. Both parties (issuer and receiver) should agree on electronic transfer of the EASA Form 1.

For that purpose, the exchange needs to include:

- all data of the EASA Form 1, including referenced data from the EASA Form 1 required by the EASA Form 1 completion instructions;
- all data required for authentication of the EASA Form 1.

In addition, the exchange may include

- data necessary for the electronic format;
- additional data not required by the EASA Form 1 completion instructions, such as manufacturer code, customer identification code.

The system used for the exchange of the electronic EASA Form 1 should provide:

- A high level of digital security; the data must be protected, unaltered or uncorrupted;
- Traceability of data back to its source should be possible.

Trading partners wishing to exchange EASA Form 1 electronically should do so in accordance with these means of compliance stated in this document. It is recommended that they use an established, common, industry method such as Air Transport Association (ATA) Spec 2000 Chapter 16.

The applicant(s) are reminded that additional national and/or European requirements may need to be satisfied when operating the electronic exchange of the electronic EASA Form 1.

The receiver should be capable of regenerating the EASA Form 1 from the received data without alteration; if not the system should revert back to the paper system.

When the receiver needs to print the electronic form, refer to the subparagraph 3 here above.

(new) GM 21A.163(c) Completion of the EASA Form 1

EASA Form 1 Block 8 "Part Number"
The part number as it appears on the item, is usually defined in the design data, however in the case of a kit of parts, media containing software or any other specific condition of supply it may be defined in production data developed from design data. Information about the contents of the kit or media may be given in block 12 or in a separate document cross-referenced from block 12.

EASA Form 1 Block 12 "Remarks"
Examples of data to be entered in this block as appropriate:-

- For complete engines, a statement of compliance with the applicable emissions requirements current at the date of manufacture of the engine.
- For ETSO articles, state the applicable ETSO number.
- Modification standard
- Compliance with or non-compliance with airworthiness directives or Service Bulletins.
- Details of repair work carried out, or reference to a document where this is stated.
- Shelf life data, manufacture date, cure date etc.
- Information needed to support shipment with shortages or re-assembly after delivery
- References to aid traceability, such as batch numbers.

C. Draft Decision - I. AMC and GM to Part-21 - GM No 4 to 21.165(c) p. 34-35

comment *42* comment by: *Air France - Maintenance Quality Assurance*

1. Change acse from the first letter of Certificate in lower case, in two places. Do the same with "Conformity" in the second part of this bullet.
2. At the end of the first sentence, read:" Parts ... are not eligible for installation on a in-service type-certificated aircraft."

response *Accepted*

1. Editorial error will be corrected.
2. The word "in-service" will be added for consistency.

comment *72* comment by: *Hispano-Suiza*

This guidance should define what are the applicable design data for conformity. Can design data without relation with future approved design data be considered applicable design data?

response *Not accepted*

There is no need for giving such a definition because the determination of applicable design data is already described in GM No. 2 to 21A.121 and GM 21A.131.

resulting text

GM No. 4 to 21.165(c)
Airworthiness Release or Conformity Certificate

The EASA Form 1, when used as a release certificate as addressed in 21A.165(c)(2) and (3), may be issued in two ways:

- As an airworthiness release, only when by virtue of the arrangement described in 21A.133(b) and (c), it can be determined that the part conforms to the approved design data and is in condition for safe operation.
- As a conformity certificate, only when by virtue of the arrangement described in 21A.133(b) and (c), it can be determined that the part conforms to applicable design data which is not (yet) approved, for a reason that is indicated in block 12. Parts released with an EASA Form 1 as a conformity certificate are not eligible for installation in an in-service type-certificated aircraft.

The EASA Form 1 should only be used for conformity release purposes when it is possible to indicate the reason that prevents its issue as for airworthiness release purposes.

C. Draft Decision - II. Annex I, AMC to Part-M - AMC M.A.501 (b) p. 35

comment *43* comment by: *Air France - Maintenance Quality Assurance*

The § 3 refers to "TC holder". We suggest it refers to (S)TC holder.

response	*Accepted* It was changed accordingly for comprehensiveness.

resulting text	Refer for the resulting text at the end of "C. Draft Decision – II, AMC to Part M – AMC M.A.501" of this CRD.

C. Draft Decision - II. Annex I, AMC to Part-M - AMC M.A.501 (d) p. 35

comment	*44* comment by: *Air France - Maintenance Quality Assurance* The § 5 refers to "TC holder". We suggest it refers to (S)TC holder.
response	*Accepted* It was changed accordingly for comprehensiveness.

resulting text

AMC M.A.501 (a) - Installation

….

7. The following formats of a received EASA Form 1 or equivalent certificate are acceptable:

- A paper certificate bearing a signature (both originals and copies are accepted);
- A paper certificate generated from an electronic system (printed from electronically stored data) when complying with AMC M.A.613 (b) subparagraph 2;
- An electronic EASA Form 1 or equivalent when complying with AMC M.A.613 (b) subparagraph 2.

AMC M.A.501 (b) – Installation

1. The EASA Form 1 identifies the airworthiness ~~and eligibility~~ status of an aircraft component. Block ~~13~~ 12 "Remarks" on the EASA Form 1 in some cases contains vital airworthiness related information (see also Part-M Appendix II) which may need appropriate and necessary actions.

2. The fitment of replacement components~~/material~~ should only take place when the person referred to under M.A.801 or the M.A. Subpart F maintenance organisation is satisfied that such components~~/material~~ meet required standards in respect of manufacture or maintenance, as appropriate.

3. The person referred to under M.A.801 or the M.A. Subpart F approved maintenance organisation should be satisfied that the component in question meets the approved data/standard, such as the required design and modification standards. This may be accomplished by reference to the (S)TC holder or manufacturer's parts catalogue or other approved data (i.e. SB). Care should also be exercised in ensuring compliance with applicable AD and the status of any service life limited parts fitted to the aircraft component.

….

AMC M.A.501 (d) – Installation

….

5. EASA Form 1 or equivalent should ~~is~~ not ~~normally~~ be issued for such material and therefore none should be expected. The material specification is normally identified in the (S)TC holder's data except in the case where the Agency or the ~~c~~Competent ~~a~~Authority has agreed otherwise.

6. Items purchased in batches (fasteners etc.) should be supplied ~~intact~~ in ~~the original equipment manufacturer (OEM)~~ a package. The ~~P~~packaging should state the applicable specification/standard, P/N, batch number and the quantity ~~specified in the package~~ of the items. The documentation accompanying the material should contain the applicable specification/standard, P/N, ~~lot~~ batch number, ~~and the~~ supplied quantity, and the manufacturing sources. If the material is acquired from different ~~lots~~ batches, acceptance documentation for each ~~lot~~ batch should be supplied.

C. Draft Decision - II. Annex I, AMC to Part-M - AMC M.A.613 (a) p. 35-38

comment *4* comment by: *EASO*

Paragraph 29 refers to parts removed from an aircraft involved in an accident or incident.
This only briefly describes what is required and refers to para 2.7. Para 2.7 does not explain the requirements in detail enough for incident related parts. It does not differentiate between those parts directly affected such as overheated, seawater or excessive g forces and those parts not affected but fitted to the aircraft. It also states the TC may have to be consulted whereas it should state must be consulted and repair stations may not have the data required to restore the part to its original design specification. The part must be brought back to its original design specification to eliminate the word incident related from its history.

response *Noted*

The comment is outside the scope of this NPA. This issue will be considered for future rulemaking tasks.

comment *8* comment by: *Fokker Services*

Item (e) of point 2.6.1 of this chapter mentions the requirement of a maintenance history record to be available for each used serialised aircraft component. As a third party maintenance organisation we are frequently asked to cannibalise a component from one operators aircraft to another operators aircraft (both from Member States). Most of the time to facilitate the departure of an aircraft to the home-base after heavy maintenance in our facility. (last moment component failures) If we really have to wait for a maintenance history record for EACH serialised component we would never be able to act like this. Of course we ask for records in the case of life limited components but for On Condition components this is not feasible in our opinion.

response

Noted

The comment is outside the scope of this NPA. This issue will be considered for future rulemaking tasks.

comment

18 comment by: *BPvL e. V.*

2.6.2 Is it possible for an US FAA maintenance organisation also certified accordance to EASA Part 145 to fill out this Form 1?

2.9 Many TC holders have general information letters, not to use any component of an aircraft which was involved in a crash in which this aircraft was totally destroyed. A text should be added to this paragraph which will follow this recommendation. It could be read as follows: At no time a component of an aircraft should be used, if this aircraft is considered to be destroyed by the TC holder or the affected authority.

response

Noted

Comment to 2.6.2
No, the US organisation will have to comply with the US system and uses the US form (8130-3), following the procedure for the dual release according to the existing bilateral agreements and the instructions as described in FAA order 8130-21 at the latest revision.
Comment to 2.9
This comment is outside the remit of this rulemaking task. Nevertheless, it may happen that a component involved in an accident may recover and be restored after appropriate inspection and maintenance actions, even when the aircraft is considered lost; it is the ultimate responsibility of the competent authority to determine the future destiny of the equipment with the support of the (S)TC holder. Therefore the proposed statement is considered to be too restrictive.

C. Draft Decision - II. Annex I, AMC to Part-M - AMC M.A.613 (b) - b) Characteristics of the Computer Generated Signature System p. 39

comment

78 comment by: *CAA-NL (IVW)*

Computer generated signature and electronic exchange of the EASA Form 1

Needs in general to be more structured, for example:

The electronic system must fulfil security standards such as:
a. confidentiality (ensuring that information is accessible only to those authorised to have access);
b. integrity (safeguarding the accuracy and completeness of information and processing methods); and
c. availability (ensuring that authorised users have access to information and associated assets when required.

Mention further the specific requirements for above items for persons/authorisations, formats, documents incl. **archiving**, for instance:

Ad. a.

	• guarantee secure access for each certifying staff; • provide for a "personal" signature, identifying the signatory. The signature should be generated only in presence of the signatory Ad. b. • ensure integrity and accuracy of the data certified by the signature of the Form and be able to show evidence of the authenticity of the EASA Form 1(recording and record keeping) with suitable security, safeguards and backups. Etc. Please take also in consideration for auditing purpuses ISO/IEC 17799 (expected to be renamed ISO/IEC 27002) or equivalent national standards, since this is an information security standard published by the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC). It is entitled *Information technology - Security techniques - Code of practice for information security management*. If an approved organisation can show compliance with this standard, it makes it probably easier for the surveyor to review the organisation's approaches for securing the information contained in electronic means. **3. Characteristics of the computer signature:** The reason for decribed requirement is not clear. Once the system is approved since it fulfils the requirements, why then still put extra prints like; A watermark-type "PRINTED FROM ELECTRONIC FILE" must be printed on document 13 of the Form?
response	*Not accepted* The majority of the proposals are covered by the AMC. Some suggestions are considered to be too detailed, e. g. "specific requirements for above items for persons/authorisations, formats, documents incl. archiving, ". Additional standards It is already mentioned in the proposal that additional national or EU standards maybe applicable. Characteristics of the computer signature: Not accepted The statement is necessary to clearly inform the end user that the document was issued from a computer generated signature system. Any confusion with a form that has been manually released will be not possible. In addition, the text is harmonised with the FAA.

resulting text	Refer for the resulting text at the end of "C. Draft Decision – II, ANNEX I, AMC to Part M – AMC M.A.613(b)" of this CRD.

C. Draft Decision - II. Annex I, AMC to Part-M - AMC M.A.613 (b) - c) Characteristics of the Computer Generated Signature p. 39-40

comment	*77* comment by: *CAA-NL (IVW)* **c) Characteristics of the computer signature:** The reason for decribed requirement is not clear. Once the system is approved since it fulfils the requirements, why then still put extra prints like; A watermark-type "PRINTED FROM ELECTRONIC FILE" must be printed on document 13 of the Form?
response	*Not accepted* The statement is necessary to clearly inform the end user that the document was issued from a computer generated signature system. Any confusion with a form that has been manually released will be not possible. In addition, the text is harmonised with the FAA.

resulting text: Refer for the resulting text at the end of "C. Draft Decision – II, ANNEX I, AMC to Part M – AMC M.A.613(b)" of this CRD.

C. Draft Decision - II. Annex I, AMC to Part-M - AMC M.A.613 (b) - d) Electronic Exchange of the Electronic EASA Form 1 p. 40

comment	*134* comment by: *FAA* **Suggested Revision to AMC M.A.613 (b) Component certificate of release to service;** 2. d), Page 40: Revise the text as follows: **d. Electronic exchange of the electronic EASA Form 1** The electronic exchange of the electronic EASA Form 1 **should be accomplished on a voluntary basis.** ..... As soon as the receiver is not capable of **electronically receiving** the document, the system should **revert back** to the paper system. ..... When needed for an electronic EASA Form 1 or its exchange, additional data necessary for the electronic format (manufacturer, customer identification code, etc.) may be added to the printed copies of EASA Form 1, **as long as the additional data does not prevent a person from filling out, issuing, printing, or reading any portion of the EASA Form 1.** Revisions are for clarification of text.
response	*Accepted* This part of this AMC has been re-drafted; when still applicable, the suggested changes have been incorporated.

resulting text

AMC M.A.613 (b) Component certificate of release to service

1. The following formats of an issued EASA Form 1 or equivalent certificate are acceptable:

- A paper certificate bearing a signature (both originals and copies are accepted);
- A paper certificate generated from an electronic system (printed from electronically stored data) when complying with the following subparagraph 2;
- An electronic EASA Form 1 or equivalent when complying with the following subparagraph 2.

2. Electronic signature and electronic exchange of the EASA Form 1

a) Submission to the Competent Authority

Any applicant intending to implement a electronic signature procedure to issue EASA Form 1 and/or to exchange electronically such data contained on the EASA Form 1, must document it and submit it to the Competent Authority as part of the documents attached with its exposition.

b) Characteristics of the electronic system generating the EASA Form 1

The electronic system must:

- guarantee secure access for each certifying staff;
- ensure integrity and accuracy of the data certified by the signature of the Form and be able to show evidence of the authenticity of the EASA Form 1 (recording and record keeping) with suitable security, safeguards and backups;
- be active only at the location where the part is being released with an EASA Form 1;
- not permit to sign a blank form;
- provide a high degree of assurance that the data has not been modified after signature (if modification is necessary after issuance, i.e., re-certification of a part, a new form with a new number and reference to the initial issuance should be made).
- provide for a "personal" electronic signature, identifying the signatory. The signature should be generated only in presence of the signatory.

An electronic signature means data in electronic form which are attached to or logically associated with other electronic data and which serve as a method of authentication and should meet the following criteria

- it is uniquely linked to the signatory;
- it is capable of identifying the signatory;
- it is created using means that the signatory can maintain under his sole control.

An electronic signature is defined as an electronically generated value based on a cryptographic algorithm and appended to data in a way to enable the verification of the data's source and integrity.

Applicants are reminded that additional national and/or European requirements may need to be satisfied when operating electronic systems. "Directive 1999/93/EC of the European Parliament and of the Council of 13 December 1999 on a Community framework for electronic signatures" may constitute a reference.

The electronic system must be based on a policy and management structure (confidentiality, integrity and availability), such as:

- Administrators, signatories
- Scope of authorisation, rights
- Password and secure access, authentication, protections, confidentiality
- Track changes
- Minimum blocks to be completed, completeness of information
- Archives
- Etc.

The electronic system generating the EASA Form 1 may contain additional data such as;

- Manufacturer code
- Customer identification code
- Workshop report
- Inspection results
- etc

c) Characteristics of the EASA Form 1 generated from the electronic system

To facilitate understanding and acceptance of the EASA Form 1 released with an electronic signature the following statement should be in Block 14b: "Electronic Signature on File".

In addition to this statement, it is accepted to print or display a signature in any form such as a representation of the hand-written signature of the person signing (i.e. scanned signature) or their name.

When printing the electronic form, the EASA Form 1 should meet the general format as specified in Appendix II to Part-M. A watermark-type "PRINTED FROM ELECTRONIC FILE" must be printed on the document.

When the electronic file contains a hyperlink to data, required to determine the airworthiness of the item(s), the data associated to the hyperlink, when printed, should be in a legible format and be identified as a reference from the EASA Form 1.

Additional information not required by the EASA Form 1 completion instructions may be added to the printed copies of EASA Form 1, as long as the additional data do not prevent a person from filling out, issuing, printing, or reading any portion of the EASA Form 1. This additional data should be provided only in block 12 unless it is necessary to include it in another block to clarify the content of that block.

d) Electronic exchange of the electronic EASA Form 1

The electronic exchange of the electronic EASA Form 1 should be accomplished on a voluntary basis. Both parties (issuer and receiver) should agree on electronic transfer of the EASA Form 1.

For that purpose, the exchange needs to include:

- all data of the EASA Form 1, including referenced data from the EASA Form 1 required by the EASA Form 1 completion instructions;
- all data required for authentication of the EASA Form 1.

In addition, the exchange may include

- data necessary for the electronic format;
- additional data not required by the EASA Form 1 completion instructions, such as manufacturer code, customer identification code.

The system used for the exchange of the electronic EASA Form 1 should provide:

- A high level of digital security; the data must be protected, unaltered or uncorrupted;
- Traceability of data back to its source should be possible.

Trading partners wishing to exchange EASA Form 1 electronically should do so in accordance with these means of compliance stated in this document. It is recommended that they use an established, common, industry method such as Air Transport Association (ATA) Spec 2000 Chapter 16.

The applicant(s) are reminded that additional national and/or European requirements may need to be satisfied when operating the electronic exchange of the electronic EASA Form 1.

The receiver should be capable of regenerating the EASA Form 1 from the received data without alteration; if not the system should revert back to the paper system.

When the receiver needs to print the electronic form, refer to the subparagraph c) here above.

(new) GM to M.A 613 and M.A.802

EASA Form 1 Block 12 "Remarks"

Examples of data to be entered in this block as appropriate:-

- Maintenance documentation used, including the revision status, for all work performed and not limited to the entry made in block 11. A statement such as "in accordance with the CMM" is not acceptable.
- NDT methods with appropriate documentation used when relevant.
- Compliance with airworthiness directives or service bulletins.
- Repairs carried out.
- Modifications carried out.
- Replacement parts installed.
- Life limited parts status.
- Shelf life limitations.
- Deviations from the customer work order.
- Release statements to satisfy a foreign Civil Aviation Authority maintenance requirement.
- Information needed to support shipment with shortages or re-assembly after delivery.
- References to aid traceability, such as batch numbers.

C. Draft Decision - III. Annex II, AMC to Part-145 - AMC 145.A.42(a) (5) p. 41

comment

38 comment by: *CAA CZ*

The new incorporated article has borrowed the provision about consumables from Part M. However, the last two points No. 6 and 7 have been omitted. The CAA CZ is not familiar with the reasons for not adopting the complete wording and recommends to maintain the text as contained in Part M.

response

Partially Accepted

It is agreed that this AMC to Part-M and Part-145 (point 6 and 7 of AMC M.A.501(d) and AMC 145.A.42(a)(5)) should also be consistent. Discussion resulting from this comment however also revealed that point 6 is too restrictive and point 7 not appropriate for acceptance of components. Therefore an amended point 6 is introduced in both AMC M.A.501(d) and AMC 145.A.42(a)(5) and point 7 has been removed.

resulting text

AMC 145.A.42(a) (1) Acceptance of components

1. An EASA Form 1 is acceptable when issued by an EASA Part-21 Production or Part-145 Maintenance organisation.

2. An equivalent document to an EASA Form 1 may be:

….

3. The following formats of a received EASA Form 1 or equivalent certificate are acceptable:

- A paper certificate bearing a signature (both originals and copies are accepted);
- A paper certificate generated from an electronic system (printed from electronically stored data) when complying with AMC No. 1 to 145.A.50(d) subparagraph 3;
- An electronic EASA Form 1 or equivalent when complying with AMC No. 1 to 145.A.50(d) subparagraph 3.

AMC 145.A.42(a) (5) Acceptance of components

1. Consumable material is any material which is only used once, such as lubricants, cements, compounds, paints, chemicals dyes and sealants etc.
2. Raw material is any material that requires further work to make it into a component part of the aircraft such as metals, plastics, wood, fabric etc.
3. Material both raw and consumable should only be accepted when satisfied that it is to the required specification. To be satisfied, the material and or its packaging should be marked with the specification and where appropriate the batch number.
4. Documentation accompanying all material should clearly relate to the particular material and contain a conformity statement plus both the manufacturing and supplier source. Some material is subject to special conditions such as storage condition or life limitation etc. and this should be included on the documentation and/or material packaging.

5. EASA Form 1 or equivalent should not be issued for such material and therefore none should be expected. The material specification is normally identified in the (S)TC holder's data except in the case where the Agency or the Competent Authority has agreed otherwise.
6. Items purchased in batches (fasteners etc.) should be supplied in a package. The packaging should state the applicable specification/standard, P/N, batch number and the quantity of the items. The documentation accompanying the material should contain the applicable specification/standard, P/N, batch number, supplied quantity and the manufacturing sources. If the material is acquired from different batches, acceptance documentation for each batch should be supplied.

AMC 145.A.42(b) Acceptance of components

The EASA Form 1 or equivalent identifies the ~~eligibility~~ ~~and~~ status of an aircraft component. Block ~~13~~ 12"Remarks" on the EASA Form ~~One~~ 1 in some cases contains vital airworthiness related information which may need appropriate and necessary actions.
….

C. Draft Decision - III. Annex II, AMC to Part-145 - AMC 145.A.50(a) p. 41-44

comment	*5* comment by: *Aytekin OZDILEK* An approved maintenance organisation carries out maintenance on aircraft or component ordered by the operator or the owner. If the organisation knows that there is an overdue airworthiness directive (AD) then it should not issue the certificate of release to service (CRS) after maintenance on aircraft, or Form 1 after maintenance on component. But how will the maintenance organisation know that there are no overdue AD's? Does it mean that an approved maintenance organisation should check all airworthiness directives applicable to the aircraft/component in order to ensure that there are no overdue AD's prior to issue of the CRS for aircraft or Form 1 for components? How will it ensure that an AD is closed when it was accomplished by someone else? The AMC should clearly state what is required.
response	*Noted* (See response to comment 23) The owner or operator is ultimately responsible for knowing the status of the component in accordance with M.A.201. The maintenance organisation is not required to check AD compliance status if not asked by the owner/operator to do so, but if it finds that an AD which is applicable, is not complied with, it should not release the part. This may be clear from evidence that can be found physically on the part.

comment	*58* comment by: *UK CAA* **Commentor:** UK CAA **Paragraph:** AMC 145.A.50(a) pg 41 **Comment:** The statement in 145.A.50(a) is repeated in 145.A.50(b)(5), this is unnecessary.
response	*Accepted* The proposal has been taken out (no more duplication).

resulting text

AMC 145.A.50(a) Certification of maintenance

~~1. A component which has been maintained off the aircraft needs the issue of a certificate of release to service for such maintenance and another certificate of release to service in regard to being installed properly on the aircraft when such action occurs. In the case of base maintenance this takes the form of a separate task sign off for the maintenance and installation tasks.~~

~~1.2. When an organisation maintains a component for use by the organisation, an EASA Form 1 may not be necessary depending upon the organisations' internal release procedures defined in the maintenance organisation exposition.~~

~~1.3~~. "Hazard seriously the flight safety" means any instances where safe operation could not be assured or which could lead to an unsafe condition. It typically includes, but is not limited to, significant cracking, deformation, corrosion or failure of primary structure, any evidence of burning, electrical arcing, significant hydraulic fluid or fuel leakage and any emergency system or total system failure. An airworthiness directive overdue for compliance is also considered a hazard to flight safety.

~~2. In the case of the issue of EASA Form 1 for components in storage prior to Part-145 and Part-21 and not released on an EASA Form 1 or equivalent in accordance with 145.A.42(a) or removed serviceable from a serviceable aircraft or an aircraft which have been withdrawn from service the following applies.~~

~~2.1 An EASA Form 1 may be issued for an aircraft component which has been:~~

- ~~Maintained before Part-145 became effective or manufactured before Part-21 became effective.~~
- ~~Used on an aircraft and removed in a serviceable condition. Examples include leased and loaned aircraft components.~~
- ~~Removed from aircraft which have been withdrawn from service, or from aircraft which have been involved in abnormal occurrences such as accidents, incidents, heavy landings or lightning strikes.~~
- ~~Components maintained by an unapproved organisation.~~

~~2.2. An appropriately rated maintenance organisation approved under Part-145 may issue an EASA Form 1 as detailed in this AMC sub-paragraph 2.5 to 2.9, as appropriate, in accordance with procedures detailed in the exposition as approved by the competent authority. The appropriately rated organisation is responsible for ensuring that all reasonable measures have been taken to ensure that only approved and serviceable aircraft components are issued an EASA Form 1 under this paragraph.~~

~~2.3. For the purposes of this paragraph 2 only, appropriately rated means~~

~~an organisation with an approval class rating for the type of component or for the product in which it may be installed.~~

~~2.4. An EASA Form 1 issued in accordance with this paragraph 2 should be issued by signing in block 20 and stating "Inspected" in block 12. In addition, block 13 should specify:~~

~~2.4.1. When the last maintenance was carried out and by whom.~~

~~2.4.2. If the component is unused, when the component was manufactured and by whom with a cross reference to any original documentation which should be included with the Form.~~

~~2.4.3. A list of all airworthiness directives, repairs and modifications known to have been incorporated. If no airworthiness directives or repairs or modifications are known to be incorporated then this should be so stated.~~

~~2.4.4. Detail of life used for service life limited parts being any combination of fatigue, overhaul or storage life.~~

~~2.4.5. For any aircraft component having its own maintenance history record, reference to the particular maintenance history record as long as the record contains the details that would otherwise be required in block 13. The maintenance history record and acceptance test report or statement, if applicable, should be attached to the EASA Form 1.~~

~~2.5. New / unused aircraft components~~

~~2.5.1 Any unused aircraft component in storage without an EASA Form 1 up to the effective date(s) for Part-21 that was manufactured by an organisation acceptable to the competent authority at the time may be issued an EASA Form 1 by an appropriately rated maintenance organisation approved under Part-145. The EASA Form 1 should be issued in accordance with the following subparagraphs which should be included in a procedure within the maintenance organisation manual.~~

~~Note 1: It should be understood that the release of a stored but unused aircraft component in accordance with this paragraph represents a maintenance release under Part-145 and not a production release under Part-21. It is not intended to bypass the production release procedure agreed by the Member State for parts and subassemblies intended for fitment on the manufacturers own production line.~~

~~(a) An acceptance test report or statement should be available for all used and unused aircraft components that are subjected to acceptance testing after manufacturing or maintenance as appropriate.~~

~~(b) The aircraft component should be inspected for compliance with the manufacturer's instructions and limitations for storage and condition including any requirement for limited storage life, inhibitors, controlled climate and special storage containers. In addition or in the absence of specific storage instructions the aircraft component should be inspected for damage, corrosion and leakage to ensure good condition.~~

~~(c) The storage life used of any storage life limited parts should be established.~~

~~2.5.2. If it is not possible to establish satisfactory compliance with all applicable conditions specified in subparagraph 2.5.1 (a) to (c) inclusive the aircraft component should be disassembled by an appropriately rated organisation and subjected to a check for incorporated airworthiness directives, repairs and modifications and inspected/tested in accordance with~~

~~the manufacturers maintenance instructions to establish satisfactory condition and, if relevant, all seals, lubricants and life limited parts replaced. On satisfactory completion after reassembly an EASA Form 1 may be issued stating what was carried out and the reference of the manufacturers maintenance instructions included.~~

~~2.6. Used aircraft components removed from a serviceable aircraft.~~

~~2.6.1. Serviceable aircraft components removed from a Member State registered aircraft may be issued an EASA Form 1 by an appropriately rated organisation subject to compliance with this subparagraph.~~

~~a. The organisation should ensure that the component was removed from the aircraft by an appropriately qualified person.~~

~~b. The aircraft component may only be deemed serviceable if the last flight operation with the component fitted revealed no faults on that component/related system.~~

~~c. The aircraft component should be inspected for satisfactory condition including in particular damage, corrosion or leakage and compliance with any additional manufacturers maintenance instructions .~~

~~d. The aircraft record should be researched for any unusual events that could affect the serviceability of the aircraft component such as involvement in accidents, incidents, heavy landings or lightning strikes. Under no circumstances may an EASA Form 1 be issued in accordance with this paragraph 2.6 if it is suspected that the aircraft component has been subjected to extremes of stress, temperatures or immersion which could effect its operation.~~

~~e. A maintenance history record should be available for all used serialised aircraft components.~~

~~f. Compliance with known modifications and repairs should be established.~~

~~g. The flight hours/cycles/landings as applicable of any service life limited parts including time since overhaul should be established.~~

~~h. Compliance with known applicable airworthiness directives should be established.~~

~~i. Subject to satisfactory compliance with this subparagraph 2.6.1 an EASA Form 1 may be issued and should contain the information as specified in paragraph 2.4 including the aircraft from which the aircraft component was removed.~~

~~2.6.2. Serviceable aircraft components removed from a non Member State registered aircraft may only be issued an EASA Form 1 if the components are leased or loaned from the maintenance organisation approved under Part 145 who retains control of the airworthiness status of the components. An EASA Form 1 may be issued and should contain the information as specified in paragraph 2.4 including the aircraft from which the aircraft component was removed.~~

~~2.7. Used aircraft components removed from an aircraft withdrawn from service. Serviceable aircraft components removed from a Member State registered aircraft withdrawn from service may be issued an EASA Form 1 by a maintenance organisation approved under Part 145 subject to compliance with this sub paragraph.~~

~~a. Aircraft withdrawn from service are sometimes dismantled for spares.~~

~~This is considered to be a maintenance activity and should be accomplished under the control of an organisation approved under Part-145, employing procedures approved by the competent authority.~~

~~b. To be eligible for installation components removed from such aircraft may be issued with an EASA Form 1 by an appropriately rated organisation following a satisfactory assessment.~~

~~c. As a minimum the assessment will need to satisfy the standards set out in paragraphs 2.5 and 2.6 as appropriate. This should where known, include the possible need for the alignment of scheduled maintenance that may be necessary to comply with the maintenance programme applicable to the aircraft on which the component is to be installed.~~

~~d. Irrespective of whether the aircraft holds a certificate of airworthiness or not, the organisation responsible for certifying any removed component should satisfy itself that the manner in which the components were removed and stored are compatible with the standards required by Part-145.~~

~~e. A structured plan should be formulated to control the aircraft disassembly process. The disassembly is to be carried out by an appropriately rated organisation under the supervision of certifying staff, who will ensure that the aircraft components are removed and documented in a structured manner in accordance with the appropriate maintenance data and disassembly plan.~~

~~f. All recorded aircraft defects should be reviewed and the possible effects these may have on both normal and standby functions of removed components are to be considered.~~

~~g. Dedicated control documentation is to be used as detailed by the disassembly plan, to facilitate the recording of all maintenance actions and component removals performed during the disassembly process. Components found to be unserviceable are to be identified as such and quarantined pending a decision on the actions to be taken. Records of the maintenance accomplished to establish serviceability are to form part of the component maintenance history.~~

~~h. Suitable Part-145 facilities for the removal and storage of removed components are to be used which include suitable environmental conditions, lighting, access equipment, aircraft tooling and storage facilities for the work to be undertaken. While it may be acceptable for components to be removed, given local environmental conditions, without the benefit of an enclosed facility subsequent disassembly (if required) and storage of the components should be in accordance with manufacturer's recommendations.~~

~~2.8. Used aircraft components maintained by organisations not approved in accordance with Part-145. For used components maintained by a maintenance organisation unapproved under Part-145, due care should be exercised before acceptance of such components. In such cases an appropriately rated maintenance organisation approved under part-145 should establish satisfactory conditions by:~~

~~a) dismantling the component for sufficient inspection in accordance with the appropriate maintenance data,~~

~~b) replacing of all service life limit components when no satisfactory evidence of life used is available and/or the components are in an unsatisfactory condition,~~

~~c) reassembling and testing as necessary the component,~~

~~d) completing all certification requirements as specified in 145.A.50.~~

~~2.9. Used aircraft components removed from an aircraft involved in an accident or incident. Such components should only be issued with an EASA Form 1 when processed in accordance with paragraph 2.7 and a specific work order including all additional necessary tests and inspections made necessary by the accident or incident. Such a work order may require input from the TC holder or original manufacturer as appropriate. This work order should be referenced in block 13.~~

AMC145.A.50(b) Certification of maintenance

1. The certificate of release to service should contain the following statement: 'Certifies that the work specified except as otherwise specified was carried out in accordance with Part-145 and in respect to that work the aircraft/aircraft component is considered ready for release to service'.

2. The certificate of release to service should relate to the task specified in the ~~manufacturer's~~ TC holder's or operator's instructions or the aircraft maintenance program which itself may cross-refer to maintenance data ~~a manufacturer's/operator's instruction in a maintenance manual, service bulletin etc.~~

3. The date such maintenance was carried out should include when the maintenance took place relative to any life or overhaul limitation in terms of date/flying hours/cycles/landings etc., as appropriate.

4. When extensive maintenance has been carried out, it is acceptable for the certificate of release to service to summarise the maintenance so long as there is a unique cross-reference to the work-pack containing full details of maintenance carried out. Dimensional information should be retained in the work-pack record.

5. ~~The person issuing the certificate of release to service should use his normal signature except in the case where computer release to service system is used. In this latter case the competent authority will need to be satisfied that only the particular person can electronically issue the release to service. One such method of compliance is the use of a magnetic or optical personal card in conjunction with a personal identity number (PIN) known only to the individual which is keyed into the computer. An additional certification stamp is optional.~~

C. Draft Decision - III. Annex II, AMC to Part-145 - AMC 145.A.50(b) p. 44

comment	*135* comment by: *FAA* **Suggested Revision to AMC 145A.50 (b) Certification of maintenance, 5., Page 44:** Revise the phrase "Hazard seriously the flight safety" to 5. "**Serious hazard to flight safety**" means.... The original text is confusing and is incorrect English phrasing.
response	*Noted* The comment is not valid anymore for AMC 145A.50 (b) after the answer given to comment 58.

C. Draft Decision - III. Annex II, AMC to Part-145 - AMC No 1 to 145.A.50(d) p. 44-45

comment	*137* comment by: *FAA* **Suggested Revision to AMC No. 1 to 145.A.50 (d) Certification of maintenance, 1., 6th paragraph, Page 45:** Please **delete** the following paragraph: ~~Under no circumstances may a certificate be issued for any item when it is known that the item has a defect considered a serious hazard to flight safety.~~ Statement adds no benefit to the instructions. Also, by adding this statement it implies that defects may be acceptable depending on the circumstances.:
response	*Accepted*

resulting text	Refer for the resulting text at the end of "C. Draft Decision – III, Annex II, AMC to Part–145 – AMC No 1 to 145.A.50" of this CRD.

C. Draft Decision - III. Annex II, AMC to Part-145 - AMC No 1 to 145.A.50(d) - b) Characteristics of the Computer Generated Signature System p. 45-46

comment	*79* comment by: *CAA-NL (IVW)* **Computer generated signature and electronic exchange of the EASA Form 1** Needs in general to be more structured, for example: The electronic system must fulfil security standards such as: a. confidentiality (ensuring that information is accessible only to those authorised to have access); b. integrity (safeguarding the accuracy and completeness of information and processing methods); and c. availability (ensuring that authorised users have access to information and associated assets when required. Mention further the specific requirements for above items for persons/authorisations, formats, documents incl. **archiving**, for instance: Ad. a. • guarantee secure access for each certifying staff; • provide for a "personal" signature, identifying the signatory. The

signature should be generated only in presence of the signatory

Ad. b.

- ensure integrity and accuracy of the data certified by the signature of the Form and be able to show evidence of the authenticity of the EASA Form 1(recording and record keeping) with suitable security, safeguards and backups.

Etc.

Please take also in consideration for auditing purpuses ISO/IEC 17799 (expected to be renamed ISO/IEC 27002) or equivalent national standards, since this is an information security standard published by the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC). It is entitled *Information technology - Security techniques - Code of practice for information security management*. If an approved organisation can show compliance with this standard, it makes it probably easier for the surveyor to review the organisation's approaches for securing the information contained in electronic means.

response

Not accepted

The majority of the proposals are covered by the AMC.
Some suggestions are considered to be too detailed, e. g. "specific requirements for above items for persons/authorisations, formats, documents incl. archiving, ".

Additional standards
It is already mentioned in the proposal that additional national or EU standards maybe applicable.

Characteristics of the computer signature:
Not accepted
The statement is necessary to clearly inform the end user that the document was issued from a computer generated signature system. Any confusion with a form that has been manually released will be not possible.
In addition, the text is harmonised with the FAA.

comment

138 comment by: *FAA*

Suggested Revision to AMC No. 1 to 145.A.50 (d) Certification of maintenance; 3. b), Page 45:

Move the parenthetical bracket in the sentence, as follows:
b) Characteristics of the computer generated system

The electronic system must:
-
-
-
- provide a high degree of assurance that the data has not been modified after signature (if modification is necessary after issuance, i.e., re-certification of a part, a new form with a new number and reference to the

	initial issuance should be made**)** Typing error. Need parenthesis at the end of the sentence to complete the "if" phrase "(if modification is necessary.....)"
response	*Accepted*

resulting text	Refer for the resulting text at the end of "C. Draft Decision – III, Annex II, AMC to Part–145 – AMC No 1 to 145.A.50" of this CRD.

C. Draft Decision - III. Annex II, AMC to Part-145 - AMC No 1 to 145.A.50(d) - c) Characteristics of the Computer Generated Signature p. 46

comment	*80* comment by: *CAA-NL (IVW)* **c) Characteristics of the computer signature:** The reason for decribed requirement is not clear. Once the system is approved since it fulfils the requirements, why then still put extra prints like; A watermark-type "PRINTED FROM ELECTRONIC FILE" must be printed on document 13 of the Form?
response	*Not accepted* The statement is necessary to clearly inform the end user that the document was issued from a computer generated signature system. Any confusion with a form that has been manually released will be not possible. In addition, the text is harmonised with the FAA.

comment	*100* comment by: *DASSAULT AVIATION Airworthiness Assurance Office* Delete the sentence "A watermark-type 'PRINTED FROM ELECTRONIC FILE' must be printed on document". Indeed, it is a common rule in industry that both originals and copies of paper certificates are accepted. Furthermore, such rule is also proposed in the new AMC 145.A.42(a)(1)(3) of this NPA 2007-13 for paper certificate bearing a signature. So, we consider that it is useless to add a specific watermark-type when printing an EASA Form 1 certificate issued through a computer-generated signature process. The statement "Electronic Signature of File" in block 14b is sufficient to identify such certificate.
response	*Not accepted* The statement is necessary to clearly inform the end user that the document was issued from a computer generated signature system. Any confusion with a form that has been manually released will be not possible. In addition, the text is harmonised with the FAA.

resulting text	Refer for the resulting text at the end of "C. Draft Decision – III, Annex II, AMC to Part–145 – AMC No 1 to 145.A.50" of this CRD.

C. Draft Decision - III. Annex II, AMC to Part-145 - AMC No 1 to 145.A.50(d) - d) Electronic Exchange of the Electronic EASA Form 1 p. 46-47

comment

139 comment by: *FAA*

Suggested Revision to AMC No. 1 to 145.A.50 (d) Certification of maintenance; 3. d), Page 46:
Revise the text as follows:
d. Electronic exchange of the electronic EASA Form 1

The electronic exchange of the electronic EASA Form 1 **should be accomplished on a voluntary basis.**
.....
As soon as the receiver is not capable of **electronically receiving** the document, the system should **revert back** to the paper system.
.....
When needed for an electronic EASA Form 1 or its exchange, additional data necessary for the electronic format (manufacturer, customer identification code, etc.) may be added to the printed copies of EASA Form 1, **as long as the additional data does not prevent a person from filling out, issuing, printing, or reading any portion of the EASA Form 1.**

Revisions are for clarification of text.

response

Partially accepted

This part of this AMC has been re-drafted; when still applicable, the suggested changes have been incorporated.

resulting text

AMC No. 1 to 145.A.50(d) Certification of maintenance

1. The purpose of the certificate is to release assemblies/items/components/parts (hereafter referred to as 'item(s)') after maintenance and to release maintenance work carried out on such items under the approval of a ~~c~~Competent ~~a~~Authority and to allow items removed from one aircraft/aircraft component to be fitted to another aircraft/aircraft component.

   The certificate used for release of items is called the ~~referenced~~ EASA Form 1 ~~is called the authorised release certificate~~.

   The certificate is to be used for export/import purposes, as well as for domestic purposes, and serves as an official certificate for items from the manufacturer/maintenance organisation to users. The certificate is not a delivery or shipping note.

   It can only be issued by organisations approved by the particular ~~c~~Competent ~~a~~Authority within the scope of the approval.

   The certificate may be used as a rotable tag by utilising the available space on the reverse side of the certificate for any additional information and de~~i~~spatching the item with two copies of the certificate so that one copy may be eventually returned with the item to the maintenance organisation. The alternative solution is to use existing rotable tags and also supply a copy of the certificate.

~~Under no circumstances may a certificate be issued for any item when it is known that the item has a defect considered a serious hazard to flight safety.~~

A certificate should not be issued for any item when it is known that the item is unserviceable except in the case of an item undergoing a series of maintenance processes at several maintenance organisations approved under Part-145 and the item needs a certificate for the previous maintenance process carried out for the next maintenance organisation approved under Part-145 to accept the item for subsequent maintenance processes. As mentioned for Block ~~13~~12, a clear statement of limitation should be endorsed in Block ~~13~~12.

NOTE: Aircraft may not be released using the certificate.

2. The following formats of an issued EASA Form 1 or equivalent certificate are acceptable:

- A paper certificate bearing a signature (both originals and copies are accepted);
- A paper certificate generated from an electronic system (printed from electronically stored data) when complying with the following subparagraph 3;
- An electronic EASA Form 1 or equivalent when complying with the following subparagraph 3.

3. Electronic signature and electronic exchange of the EASA Form 1

a) Submission to the Competent Authority

Any applicant intending to implement a electronic signature procedure to issue EASA Form 1 and/or to exchange electronically such data contained on the EASA Form 1, must document it and submit it to the Competent Authority as part of the documents attached with its exposition.

b) Characteristics of the electronic system generating the EASA Form 1

The electronic system must:
- guarantee secure access for each certifying staff;
- ensure integrity and accuracy of the data certified by the signature of the Form and be able to show evidence of the authenticity of the EASA Form 1 (recording and record keeping) with suitable security, safeguards and backups;
- be active only at the location where the part is being released with an EASA Form 1;
- not permit to sign a blank form;
- provide a high degree of assurance that the data has not been modified after signature (if modification is necessary after issuance, i.e., re-certification of a part, a new form with a new number and reference to the initial issuance should be made).
- provide for a "personal" electronic signature, identifying the signatory. The signature should be generated only in presence of the signatory.

An electronic signature means data in electronic form which are attached to or logically associated with other electronic data and which serve as a method of authentication and should meet the following criteria
- it is uniquely linked to the signatory;
- it is capable of identifying the signatory;

- it is created using means that the signatory can maintain under his sole control.

An electronic signature is defined as an electronically generated value based on a cryptographic algorithm and appended to data in a way to enable the verification of the data's source and integrity.

Applicants are reminded that additional national and/or European requirements may need to be satisfied when operating electronic systems. "Directive 1999/93/EC of the European Parliament and of the Council of 13 December 1999 on a Community framework for electronic signatures" may constitute a reference.

The electronic system must be based on a policy and management structure (confidentiality, integrity and availability), such as:

- Administrators, signatories
- Scope of authorisation, rights
- Password and secure access, authentication, protections, confidentiality
- Track changes
- Minimum blocks to be completed, completeness of information
- Archives
- Etc.

The electronic system generating the EASA Form 1 may contain additional data such as;

- Manufacturer code
- Customer identification code
- workshop report
- Inspection results
- etc

c) Characteristics of the EASA Form 1 generated from the electronic system

To facilitate understanding and acceptance of the EASA Form 1 released with an electronic signature the following statement should be in Block 14b: "Electronic Signature on File".

In addition to this statement, it is accepted to print or display a signature in any form such as a representation of the hand-written signature of the person signing (i.e. scanned signature) or their name.

When printing the electronic form, the EASA Form 1 should meet the general format as specified in Appendix I to Part-145. A watermark-type "PRINTED FROM ELECTRONIC FILE" must be printed on the document.

When the electronic file contains a hyperlink to data, required to determine the airworthiness of the item(s), the data associated to the hyperlink, when printed, should be in a legible format and be identified as a reference from the EASA Form 1.

Additional information not required by the EASA Form 1 completion instructions may be added to the printed copies of EASA Form 1, as long as the additional data do not prevent a person from filling out, issuing, printing, or reading any portion of the EASA Form 1. This additional data should be provided only in block 12 unless it is necessary to include it in another block to clarify the content of that block.

d) Electronic exchange of the electronic EASA Form 1

The electronic exchange of the electronic EASA Form 1 should be accomplished on a voluntary basis. Both parties (issuer and receiver) should agree on electronic transfer of the EASA Form 1.

For that purpose, the exchange needs to include:

- all data of the EASA Form 1, including referenced data from the EASA Form 1 required by the EASA Form 1 completion instructions;
- all data required for authentication of the EASA Form 1.

In addition, the exchange may include

- data necessary for the electronic format;
- additional data not required by the EASA Form 1 completion instructions, such as manufacturer code, customer identification code.

The system used for the exchange of the electronic EASA Form 1 should provide:

- A high level of digital security; the data must be protected, unaltered or uncorrupted;
- Traceability of data back to its source should be possible.

Trading partners wishing to exchange EASA Form 1 electronically should do so in accordance with these means of compliance stated in this document. It is recommended that they use an established, common, industry method such as Air Transport Association (ATA) Spec 2000 Chapter 16.

The applicant(s) are reminded that additional national and/or European requirements may need to be satisfied when operating the electronic exchange of the electronic EASA Form 1.

The receiver should be capable of regenerating the EASA Form 1 from the received data without alteration; if not the system should revert back to the paper system.

When the receiver needs to print the electronic form, refer to the subparagraph c) here above.

(new) GM 145.A.50(d)

EASA Form 1 Block 12 "Remarks"

Examples of data to be entered in this block as appropriate:-

- Maintenance documentation used, including the revision status, for all work performed and not limited to the entry made in block 11.
  A statement such as "in accordance with the CMM" is not acceptable.
- NDT methods with appropriate documentation used when relevant.
- Compliance with airworthiness directives or service bulletins.
- Repairs carried out.
- Modifications carried out.

- Replacement parts installed.
- Life limited parts status.
- Shelf life limitations.
- Deviations from the customer work order.
- Release statements to satisfy a foreign Civil Aviation Authority maintenance requirement.
- Information needed to support shipment with shortages or re-assembly after delivery.
- References to aid traceability, such as batch numbers.

C. Draft Decision - III. Annex II, AMC to Part-145 - AMC No 2 to 145.A.50(d) p. 47-50

comment	*140* comment by: *FAA* **Suggested Revision to AMC No. 2 to 145.A.50 (d) Certification of maintenance, 1.3, Page 47:** Revise the phrase "Hazard seriously the flight safety" to 1.3 "**Serious hazard to flight safety**" means.... The original text is confusing and is incorrect English phrasing.
response	*Not accepted* The wording is kept consistent with 145A.50(d).

1. Approving Competent Authority / Country	***AUTHORISED RELEASE CERTIFICATE*** EASA FORM 1				3. Form Tracking Number
4. Organisation Name and Address:					5. Work Order/Contract/Invoice
6. Item	7. Description	8. Part No.	9. Qty.	10. Serial No.	11. Status/Work
12. Remarks					

13a Certifies that the items identified above were manufactured in conformity to: approved design data and are in a condition for safe operation non-approved design data specified in block 12		14a. Part-145.A.50 Release to Service Other regulation specified in block 12 Certifies that unless otherwise specified in block 12, the work identified in block 11 and described in block 12, was accomplished in accordance with Part-145 and in respect to that work the items are considered ready for release to service.	
13b. Authorised Signature	13c. Approval/ Authorisation Number	14b. Authorised Signature	14c. Certificate/Approval Ref. No.
13d. Name	13e. Date (dd mmm yyyy)	14d. Name	14e. Date (dd mmm yyyy)

USER/INSTALLER RESPONSIBILITIES

This certificate does not automatically constitute authority to install the item(s).
Where the user/installer performs work in accordance with regulations of an airworthiness authority different than the airworthiness authority specified in block 1, it is essential that the user/installer ensures that his/her airworthiness authority accepts items from the airworthiness authority specified in block 1.

Statements in blocks 13a and 14a do not constitute installation certification. In all cases aircraft maintenance records must contain an installation certification issued in accordance with the national regulations by the user/installer before the aircraft may be flown.

[EASA Form 1-Issue 2]

1. Approving Competent Authority / Country	**AUTHORISED RELEASE CERTIFICATE** EASA FORM 1				3. Form Tracking Number
4. Organisation Name and Address:					5. Work Order/Contract/Invoice
6. Item	7. Description	8. Part No.	9. Qty.	10. Serial No.	11. Status/Work
12. Remarks					

13a Certifies that the items identified above were manufactured in conformity to: approved design data and are in a condition for safe operation non-approved design data specified in block 12		14a. Part-145.A.50 Release to Service Other regulation specified in block 12 Certifies that unless otherwise specified in block 12, the work identified in block 11 and described in block 12, was accomplished in accordance with Part-145 and in respect to that work the items are considered ready for release to service.	
13b. Authorised Signature	13c. Approval/ Authorisation Number	14b. Authorised Signature	14c. Certificate/Approval Ref. No.
13d. Name	13e. Date (dd mmm yyyy)	14d. Name	14e. Date (dd mmm yyyy)

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[EASA Form 1-Issue 2]