

# COVID-19 - Continuing Airworthiness

**What is the flexibility allowed to the person or organisation responsible for the aircraft continuing airworthiness when it comes to the planning of Aircraft Maintenance Programme (AMP) scheduled maintenance tasks with intervals expressed in calendar time?**

## Answer

### 1. Purpose of the document

The Agency was requested by the industry for additional guidance on the application of the airworthiness rules in respect to certain specific issues particularly affected by the current COVID-19 crisis. One of those topics concerns the obligations of the person or organisation responsible for continuing airworthiness of aircraft when it comes to the accomplishment of Aircraft Maintenance Programme tasks with intervals expressed in calendar times. Accordingly, the Agency prepared this additional, temporary, guidance, which complements the existing AMC/GM to Commission Regulation (EU) No 1321/2014.

The guidance provided in this document is primarily intended for 'Part-M' aircraft, but can be used also as regards 'Part-ML' aircraft, except that in case of 'Part-ML' aircraft, the competent authority does not need to be involved if an AMP task is to be postponed, as this is done under the responsibility of the aircraft owner or the organisation responsible for the aircraft continuing airworthiness. This person or organisation may also decide, if necessary to revise the AMP, which will not involve the competent authority.

### 2. Description of the issue

During the COVID-19 crisis, a large number of aircraft is being parked / stored at different and partially remote locations. This guidance document was prepared based on an assumption that these aircraft have been subject to parking/storage procedures defined by the Type Certificate (TC) Holder (those parking and storage procedures are usually contained in a chapter of the Aircraft Maintenance Manual (AMM e.g. Chapter 10). If the existing AMM does not contain parking/storage procedures, the TC Holder should be contacted.

Note: It is not necessary to revise the AMP to include the parking/storage tasks to be followed.

During the COVID-19 crisis, the parked/stored aircraft are not operated and consequently the AMP scheduled maintenance tasks based on 'Flight hours' and 'Flight cycles' are not impacted.

On the other hand the AMP scheduled maintenance tasks based on intervals (and threshold, if applicable) expressed in calendar times need to be considered. Indeed, some of the calendar time based scheduled maintenance tasks will become due during parking/storage period.

In the normal practice, following the principles of AMC M.A.301(c) and point 4 of Appendix I to AMC M.A.302 and AMC M.B.301(b), if a scheduled maintenance task cannot be performed within the interval approved in the AMP, its postponement may be allowed in accordance with pre-defined 'permitted variation' agreed with the CA in the AMP.

### 3. Considerations in the frame of COVID-19 crisis

#### 3.1 Postponement until the end of parking/storage period

In the current situation, it may not be always feasible, to perform the calendar scheduled maintenance tasks of the AMP in due time, or within the permitted variation specified in the AMP.

In such cases, it is acceptable for EASA to plan the accomplishment of these tasks (even if they have become due multiple times during the parking/storage period) at the next suitable opportunity (e.g. next weekly check of storage/parking procedure), or at the end of the storage/parking period, but in any case before the next flight, as part of the work package necessary for the de-preserving/de-storage of the aircraft.

Note: Certain AMP scheduled maintenance tasks may be assessed as unnecessary because they are covered by equivalent tasks in the parking/storage procedures put in place.

#### 3.2 Postponement beyond return to service

If exceptionally, a calendar task needs to be postponed until after the return to service and beyond the AMP permitted variation, the aircraft owner or CAMO/CAO should receive advice from the TCH or the Design Approval holder (DAH) on such postponement and on the subsequent due date after the accomplishment.

The applicant should then submit such postponement, together with the proposed technical justification, including if appropriate, a risk assessment, for approval by the CA.

The CA should consider the following conditions, mitigating actions or any other elements which the CA deems necessary, when allowing a postponement of a due calendar task after return to service:

- An approved maintenance organisation has applied the appropriate parking/storage procedures during the full period.
- The owner/CAMO/CAO has monitored what AMP tasks are due (M.A.708(b)(4), CAMO.A.315(b)(5) and CAO.A.075(b)(7)).
- This does not apply to mandatory continuing airworthiness instructions (MCAI) such as AD or ALS tasks.
- The environmental conditions where the aircraft was parked/stored have been taken into

consideration. Certain calendar tasks may be more relevant to a particular storage environment, e.g. wet, salty conditions propagate corrosion.

In addition, the importance of the AMP task (e.g. based on MRB task type/source/category, reliability-alert task), the performance of the CAMO/CAO quality system, and if applicable the review of the risk assessment performed by the applicant, should also be considered.

Based on the above elements, it may be possible to allow an exceptional (one-off) postponement, not exceeding the following:

- (i) AMP task interval of 1 year or less: up to 3 months
- (ii) AMP task interval of more than 1 year, but not exceeding 2 years: up to 4 months
- (iii) AMP task interval of more than 2 year, but not exceeding 3 years: up to 5 months
- (iv) AMP task interval of more than 3 years: up to 6 months.

Such postponement should be calculated from the original AMP task due date, unless otherwise agreed with the competent authority.

The subsequent due date should also be part of the CA approval.

The Aircraft continuing airworthiness record system, and if applicable, the aircraft technical log system should properly record such agreement and the effective accomplishment date.

Depending on the length of the COVID-19 crisis and the future annual utilisation of the aircraft, the CA may also require to the owner/CAMO/CAO an ad-hoc review of the AMP pursuant to M.A.302(h).

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01/07/2020

#### **Link:**

<https://www.easa.europa.eu/nl/faq/116314>

**Under the present rules, is the person responsible for the continuing airworthiness of an aircraft (owner, CAO or CAMO) allowed to split the customised maintenance checks?**

#### **Answer**

##### **1. Purpose of the document**

The Agency was requested by the industry for additional guidance on the application of the airworthiness rules in respect to certain specific issues particularly affected by the current COVID-19 crisis. One of those topics concerns the possibility for a person responsible for continuing airworthiness of aircraft to split the customised maintenance tasks. Accordingly, the

Agency prepared this additional, temporary, guidance document, which complements the existing GM/AMC to Commission Regulation (EU) No 1321/2014.

## **2. Description of the issue**

Considering the large number of aircraft grounded at the same time during the COVID-19 crisis, the movement restrictions of persons, the temporary lack of access to certain facilities and/or services, the competent authorities may need to facilitate a more practical scheduling process of the Aircraft Maintenance Programme (AMP) tasks and a simpler process of approving changes to the responsible organisation's procedures, in order to ensure as much as possible the continuation of organisation activities during this period, in compliance with the applicable requirements.

For aircraft managed under Annex I (Part-M) to Commission Regulation (EU) No 1321/2014, in accordance with M.A.301(c), the owner, CAO or CAMO, as applicable, should have a system to ensure that all aircraft maintenance tasks are performed within the limits prescribed by the approved Aircraft Maintenance Programme (AMP) and that, whenever a maintenance task cannot be performed within the required time limit, its postponement is allowed in accordance with a procedure agreed by the competent authority (CA).

If an owner, CAO or CAMO, as applicable, has developed the AMP through grouping of individual maintenance tasks into packages based on usage parameter(s) (e.g.: annual inspection, 1,000 FH inspection) or letter-checks (e.g.: A-check, C1-check), as per points M.A.302(a)&(f) any split of such a package back to individual maintenance tasks requires an amendment to the AMP and is subject to direct approval by the CA as per point M.A.302(b), unless this is already covered by the indirect approval of the AMP as per point M.A.302(c).

Under the COVID-19 circumstances, splitting the maintenance packages may give to the aircraft owner, CAO or CAMO, as applicable, the possibility to tailor and schedule the individual maintenance tasks as they are strictly needed, fitting the aircraft operational needs and activities, as well as the availability of the required facilities and/or services. It must be ensured that the AMP task intervals are respected.

For aircraft managed under Annex Vb (Part-ML) to Commission Regulation (EU) No 1321/2014, the aircraft owner, CAO or CAMO, as applicable, may simply declare/approve an amendment to the AMP in accordance with ML.A.302(b). When doing so, the same principles as the ones mentioned above for aircraft managed under Part M may be implemented, within the limits of the applicable rules.

EASA welcomes the efforts of the owners, CAOs and CAMOs, as applicable, for amending the AMPs and the CAs for having the amendments approved as quickly as possible, based on the principles mentioned above, within the limits of the applicable rules.

EASA is available to provide more technical support on this process on a case by case basis, upon the CAs' request.

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**Link:**

<https://www.easa.europa.eu/nl/faq/116316>

**Under the present rules, how can a maintenance organisation extend the use of the privileges specified in 145.A.75(c) of line maintenance performed away from an approved location?****Answer****1. Purpose of the document**

Considering the impact of the COVID-19 crisis on the aviation sector – a large number of aircraft grounded at airports/ locations where there is no maintenance organisation which can perform the required maintenance/ preservation tasks, to name but a few – the Agency was requested to provide to competent authorities (CAs) with additional guidance material to facilitate a simpler process of approving changes to the applicable organisation's procedures. This document is therefore intended to guide CAs in keeping continuing compliance with the applicable requirements and ensure, as much as possible, the continuation of maintenance organisation activities.

The guidance provided in this document is primarily intended for Part-145 organisations, but can be used also in case of Part-M, Subpart F and Part-CAO organisations, if needed.

**2. Description of the issue**

In accordance with 145.B.35 and 145.B.40 of Regulation (EU) 1321/2014, the CA may consider to approve a concession to allow deviating from the Maintenance Organisation Exposition (MOE) procedures for maintenance performed away from an approved location, as per 145.A.75(c) and permit the performance of line maintenance in a non-approved location for a period up to 3 months (90 days).

The maintenance organisation may be allowed to perform line maintenance at such a location without having the obligation to get the approval of a line station in accordance with 145.A.85 i.e. without the need to declare the location in the MOE as required by 145.A.75(d).

The concession will be controlled by the maintenance organisation in accordance with MOE

Ch. 3.10.

### **3. Considerations for the competent authority (CA)**

When deciding on approving such a concession (requested by the maintenance organisation), the CA should take into consideration its duration period and the conditions for applying the respective change of procedure, based on at least the following aspects:

- previous performance of the organisation; and
- confidence of the competent authority in the ability of the internal quality system of the organisation to ensure safe operations.

After the initial period of the approved concession, the competent authority may reassess, following the same process as described above, the situation and may approve an additional extension of the initial period with another maximum 3 months (90 days) together with specifying the related conditions, as necessary.

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#### **Link:**

<https://www.easa.europa.eu/nl/faq/116317>

**Under the present rules, how can a production or maintenance organisation continue to use tools or equipment even if their calibration/periodical check cannot be carried out before the due date?**

#### **Answer**

##### **1. Purpose of the document**

Considering the restrictions of movement of people or the temporary lack of access to certain facilities and/or services due to the COVID-19 crisis, which may have as a result that production and maintenance organisations are not able to get calibration/periodical checks of their tools and equipment carried out before the due date, the Agency was requested to provide additional guidance to the competent authorities to facilitate a simpler process of approving changes to the applicable organisation's procedures, and to ensure as much as possible the continuation of production and maintenance organisation activities during this period, in compliance with the applicable requirements.

##### **2. Description of the issue**

In accordance with:

- For Part 21, Subpart F: points 21.A.125A and 21.A.126(a)(3)/GM No 2 to 21.A.126(a)(3);

- For Part 21, Subpart G: points 21.A.139(b)1.(vii), 21.A.143(a)(11) and 21.A.145(a)/GM 21.A.145(a); and
- For Part-M, Subpart F; Part-CAO and Part-145: as applicable, points M.A.604(a)7, M.A.608(b), CAO.A.050(b), CAO.A.025(a)(10), 145.A.40(b), 145.A.70(a)12., M.A.402(d) and ML.402(b)(4),

the production or maintenance organisation shall ensure, by complying with adequate procedures included in its exposition or manual, that all tools and equipment, as appropriate, are controlled and calibrated/periodically checked according to an officially recognised standard at a frequency to ensure serviceability and accuracy.

When such a procedure includes a recurrent calibration/periodical check of tools or equipment, it is possible that, due to the COVID-19 crisis, the procedure cannot be complied with because a recurring calibration/periodical check cannot be carried out before the specified due date. In such a case, a temporary change (direct or indirect approved or concessions) to the procedure may be acceptable in order to allow continuation of the activities in compliance with the rules.

In accordance with:

- For Part 21, Subpart F: points 21.A.125A and 21.B.140;
- For Part 21, Subpart G: points 21.A.143, 21.A.147 and 21.B.240;
- For Part-M, Subpart F: points M.A.604, M.A.617 and M.B.606;
- For Part-CAO: points CAO.A.025, CAO.A.105 and CAO.B.065; and
- For Part-145: points 145.A.70, 145.A.85 and 145.B.35,

the competent authority may approve a temporary change to the applicable organisation's procedure to allow an extension of the period at the end of which the calibration/periodical check of the tool or equipment is due.

### 3. Considerations for the competent authority (CA) and the organisations

The decision of the competent authority on the approval of such a temporary change should be taken based on a risk analysis performed by the organisation. The risk analysis shall consider the previous performance and reliability of the tool or equipment, previous calibration and periodical checks results and possible additional mitigating measures (like using tools from other organisations for critical applications).

Few considerations for the risk analysis may be, but are not limited to the following:

- when the normal calibration/check period is  $\leq 12$  months the extension of the calibration and/or periodical check can be up to a maximum of 10 % of the normal calibration/check;
- when the calibration/check period is  $> 12$  months the extension of the calibration can be 10 % of the normal calibration/check period up to a maximum of 3 months;
- the risk associated to the use of the tool or equipment for the specific task in relation to ensuring conformity with the approved data or continuing airworthiness of the aircraft or

components is not determined critical;

- the tool or equipment is inspected before use and no damage or corrosion is identified;
- the tool or equipment was recently used (e.g. within the 3 months preceding the calibration or periodical check due date);
- no deficiency with the use of this tool or equipment has been reported since the last calibration or periodical check;
- the last two calibration results or last periodical checks are not showing any possible issues (e.g.: drift in the value, value very close to the acceptable limit, etc.) that can endanger the result of the activity performed.

If the risk associated to the use of the tool or equipment for the specific task is identified as critical, the organisation shall receive the tool or equipment manufacturer extension acceptance, and shall take additional measures to verify and ensure the correct production / maintenance results, such as:

verification of the tool or equipment serviceability by comparison with another tool/equipment duly calibrated/periodically checked, and/or

verification of the measurement/test/job-result by other acceptable means.

The tools or equipment with extended calibration or maintenance interval, should be recorded in a dedicated form, allowing tracking the tasks performed. If the tool / equipment fails during next regular calibration / inspection, the completed tasks may require to be verified / performed again.

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#### **Link:**

<https://www.easa.europa.eu/nl/faq/116318>

**Under the present rules, can a maintenance organisation continue to keep a supplier on the approved list even if full compliance with its evaluation of suppliers' procedure cannot be ensured?**

#### **Answer**

##### **1. Purpose of the document**

Considering the impact of the COVID-19 crisis on the aviation sector - the reduced personnel in the maintenance organisations, or late feedback/reply from their suppliers which may affect compliance with their suppliers' evaluation procedures - the Agency was requested to provide to competent authorities (CA's) with additional guidance material to facilitate a simpler process



of approving changes to the applicable organisation's procedures, in order to ensure as much as possible the continuation of maintenance organisation activities in compliance with the applicable requirements.

This document is therefore intended to guide CA's in keeping continuing compliance with the applicable requirements and ensure, as much as possible, the continuation of maintenance organisation activities.

## **2. Description of the issue**

In accordance with 145.A.70(a)(12), 145.A.42(b)(i), M.A.604(a)(7), CAO.A.025(a)(10), M.A.501(b) and ML.A.501(a)(i) of Regulation (EU) 1321/2014, as applicable, the approved organisation carrying out maintenance on products or components have to ensure, by complying with adequate procedures included in the exposition or manual (MOE chapter 2.1, MOM chapter 2.8 or CAE chapter C.3), that the necessary components, standard parts and/or material are supplied in satisfactory conditions. When such a procedure includes a recurrent evaluation of a supplier's quality system based on a questionnaire which is periodically sent by the maintenance organisation to the supplier, it is possible that, due to the COVID-19 crisis, the procedure cannot be complied with. In such a case, a temporary change to the procedure (including concessions), in accordance with 145.A.70(b), M.A.604(b) and CAO.A.105(a) 5, as applicable, may be acceptable in order to allow continuation of the activities in compliance with the rules.

## **3. Considerations for the competent authority (CA)**

In accordance with 145.B.35, 145.B.40, M.B.606(c) or CAO.B.065 of said Regulation, the competent authority may approve (direct or indirect) a temporary change to the applicable organisation's procedure to allow an extension of the period for evaluation of the suppliers' performance (when based on a questionnaire sent to supplier) up to 3 months in order to maintain the respective suppliers on the approved list of suppliers, based on a risk assessment which considers at least the following elements:

- confidence in the quality system / organisational review of the maintenance organisation; and
- analysis performed by the maintenance organisation to support the extension, taking into account the criticality of the supplied articles, the results of the previous evaluation of the respective supplier and the supplier's performance.

After the agreed extension period the situation may be reassessed and an additional extension of the initial period up to a maximum of 3 additional months may be envisaged by the CA, following the same process as the one described above (change of the organisation's applicable procedure).

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**Link:**

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

**Is there any possibility to temporary extend the validity of NDT personnel certification due to coronavirus (COVID-19) crisis?****Answer**

According to the industry standard EN4179, recognised by the EASA via AMC 145.A.30(f) and AMC M.A.606(f) to be used for qualification of NDT personnel, the NDT personnel Level 1, 2 and 3 shall be recertified every 5 years. No flexibility is given by EN4179 to deviate from the specific requirements of EN4179, Chapter 8 related to the recertification of NDT personnel process.

Due to the extraordinary worldwide coronavirus crisis, the recertification requirements might not be fulfilled (examinations). Other impacted processes can be “annual maintenance” and “vision examination” which invalidate the certification if not performed on time.

In these circumstances, the Agency recommends the organisation to agree with the Competent Authority a deviation from the organisation’s procedure (e.g. in case of Part-145 to use the normal concession process - deviation from an approved exposition (MOE) for a limited period of time) in case of a need to temporary extend (without fulfilling the normal requirements) the validity of NDT personnel certification, annual maintenance and/or vision examination. The organisation should contact their Competent Authority surveyor and agree on mitigating measures depending on the extent of the concession needed (e.g. EN4179 para. 8.3.2, second and fourth bullet points could offer grounds for mitigation measures).

For standardisation reasons, it is recommended that each National Aerospace NDT Board (NANDTB) together with the corresponding Competent Authority establishes the general scenario to be followed by the organisations (e.g. by an information notice on the NANDTB website or by e-mail etc.). This will be further adapted to the specific case (e.g. in the case of a Part-145 organisation with D1 rating additional mitigation measure could be taken for the NDT personnel who is also certifying staff).

Same principles can be applied by Part-21 Subpart G and F organisations having the NDT personnel qualified/certified i.a.w. EN 4179 when applying the GM 21.A.145(a) or GM No 2 to 21.A.126(a)(3).

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