European Union Aviation Safety Agency

Part-M

Part-M: General

Continuing airworthiness management for each type of operator/ aircraft

Answer

		CONTINUING AIRWORTHINESS MANAGEMENT
Commercial operations	Licenced air carriers [1]	Continuing airworthiness shall be performed by a CAMO. Operator shall be CAMO approved (CAMO linked to the AOC).
	Commercial specialised operations or CAT operations other than licensed air carriers or commercial ATOs	Continuing airworthiness shall be performed by a CAMO. Operator shall obtain CAMO approval, or operator shall contract a CAMO
Other than commercial operations	Complex motor-powered aircraft [2]	Continuing airworthiness shall be performed by a CAMO. Owner shall contract a CAMO
	Other than complex motor-powered aircraft (CMPA) and limited operations [3]	Continuing airworthiness management may be performed by the owner. CAMO is not required.

[1] Licenced air carriers are EU air carriers holding an operating licence in accordance with Regulation (EC) 1008/2008

[2] Twin turboprop aeroplanes of 5 700 kg MTOM and below can be exempted by the Member State from complying with any requirements applicable to CMPA and shall instead comply with the requirements applicable to other than CMPA.

[3] Limited operations are defined in Regulation (EU) 1312/2014 Article 2(p).

Last updated:
07/10/2016

Link:
https://www.easa.europa.eu/en/faq/19038

Can an independent certifying staff maintain non-complex motor-powered aircraft used by commercial ATO or commercial DTO?

Answer

No, non-complex motor-powered aircraft used by commercial ATO or commercial DTO cannot be maintained by independent certifying staff because in accordance with M.A.201(h) or ML.A.201(e)(2), these aircraft require maintenance release by an approved maintenance organisation (Part-CAO with

maintenance privilege, Part-M Subpart F or Part-145).

Note: ‘GM1 ML.A.201(e)’ provides examples of aircraft not considered to be operated by a commercial ATO or a commercial DTO.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19041

Which are the correct statements to be written in block 11 of EASA Form 1 after maintenance?

Answer

Appendix II to Part-M describes the following 4 permissible entries in block 11 of EASA Form 1:

- Overhauled,
- Repaired
- Inspected/tested
- Modified

The meaning of “Inspected/Tested” status is inspected and/or, if applicable, tested as it described in provisions of Part-M/Part-145. Besides that, block 12 in the EASA Form 1 should contain the detailed information on the status/work described in block 11.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19044

Can a licenced pilot without a valid medical certificate perform pilot-owner maintenance?

Answer

This question arises because of the different understandings of license validity in Commission Regulation (EU) No 1178/2011 This question arises because of the different understandings of license validity in Commission Regulation (EU) No 1178/2011 (Aircrew) and No 1321/2014 (Continuing Airworthiness).

In Reg. (EU) 1321/2014, the pilot-owner authorisation described in M.A.803 or ML.A.803 assumes that a pilot has sufficient technical knowledge to perform certain maintenance tasks. While exercising such pilot-owner authorisation, the pilot-owner even further develops his/her competency in maintenance. Hence, in the case where the medical examination has not been conducted or not been passed and the licence has therefore lost its validity, it is the intent of the rule to allow the pilot-owner to continue using this authorisation as long as he/she still considers himself/herself physically fit (including good visual acuity) and competent to carry out such maintenance (ref. point (a)(2) of Appendix VIII to Part-M or Appendix II of Part-ML).

This is the reason why a new point (5) was introduced in AMC M.A.803 in 2016 (ED Decision 2016/011/R) stating: “not holding a valid medical examination does not invalidate the pilot licence (or equivalent) required for the purpose of the pilot-owner authorisation”. For Part-ML the same information can be found in AMC1 ML.A.803 (ED Decision 2020/002/R).

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/47722

What are the responsibilities relevant to pre-flight inspection?

Answer

The pre-flight inspection forms part of the essential requirements for air operation, as required in Annex V (point 6.2) of the ‘Basic Regulation’ (Regulation (EU) 2018/1139). Being relevant to the aircraft’s fitness for the intended flight, this essential requirement is implemented by the Commission Regulation (EU) 1321/2014 for continuing airworthiness in the following way:

Reference	Obligation	Who	Remark
M.A.201(d) ML.A.201(d)	Carry out pre-flight inspection satisfactorily	Part-M: Pilot-in-command or, in case of Licensed Air Carrier, a qualified staff under the responsibility of the operator (e.g. maintenance staff - see note) Part-ML: Pilot-in-command or a qualified person under the responsibility of the pilot-in-command	
M.A.301(a)/ ML.A.301(a)	Ensure pre-flight inspection is carried out	Owner or CA(M)O (according to M.A.201/ML.A.201)	
M.A.301(a)/ ML.A.301(a)	Ensure pre-flight inspection includes the actions necessary to ensure that the aircraft is fit to carry out the intended flight	Owner or CA(M)O (according to M.A.201/ML.A.201)	AMC M.A.301(a) points (1) and (2) elaborates those actions
M.A.301(a)/ ML.A.301(a)	If a/c managed by CA(M)O: Provide training to ensure that pre-flight inspection is carried out adequately [AMC M.A.301(a) point (3)]	CA(M)O	Pre-flight inspection training described in the CAME part 1.11 or CAE part D.6

Additional information:			
M.A.712(b)/ CAMO.A.200(a)(3)/ CAO.A.100(b)	If a/c managed by CA(M)O: Ensure pre-flight inspection is subject to the quality system/compliance monitoring [AMC M.A.301(a) point (3)]	CA(M)O	This is important because the pre-flight inspection contributes in feeding the process of aircraft continuing airworthiness

Note:

As per the definition of ‘maintenance’ in article 2 (h) of Commission Regulation (EU) 1321/2014, ‘pre-flight inspection’ (as defined in article 2(j)) is not considered maintenance. Therefore, it does not require a certificate of release to service [M.A.201(d)/ML.A.201(d)].

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/48482

Do declared training organisations (DTO) need a CAMO/CAO and approved maintenance organisations?

Answer

Regulation (EU) No 1178/2011 was amended in July 2018 to introduce Part-DTO as regards to declared training organisations (ref. Reg. (EU) 2018/1119). Regulation (EU) No 1321/2014 was therefore amended and aligned the Continuing Airworthiness obligations of ATO with those of DTO.

This means:

		Complex motor-powered aircraft	**Other than complex motor-powered aircraft**
Commercial DTO	Applicable requirement	M.A.201(f) is applicable	M.A.201(h) or, for aircraft specified in Article 3(2), ML.A.201(e) are applicable
	Continuing airworthiness management	CAMO is required	CAO (with continuing airworthiness management privilege) or CAMO is required
	Maintenance	Part-145 organisation is required	CAO (with maintenance privilege) or Part-145 or Part-M Subpart F organisation is required
	Applicable requirement	M.A.201(g) is applicable	M.A.201(i) or, for aircraft specified in Article 3(2), ML.A.201(f) are applicable

Non-Commercial DTO	Continuing airworthiness management	CAMO is required	CAMO is not required CAO (with continuing airworthiness management privilege) is not required
	Maintenance	Part-145 organisation is required	With the exception of complex maintenance tasks under Part-M: CAO (with maintenance privilege) is not required Part-145 organisation not required Part-M Subpart F organisation is not required

Please also refer to GM1 ML.A.201(e) which provides examples of aircraft not considered to be operated by a commercial ATO or a commercial DTO.

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/65445

Airworthiness review

Can an airworthiness review certificate (ARC)/recommendation be issued after an airworthiness review with open findings?

Answer

Neither an ARC nor a recommendation can be issued with open findings. Each finding requires a corrective action before the issue of the ARC or recommendation. The corrective action should be adequate to the open finding and it should be carried out and verified by the airworthiness review staff (ARS) before the issue of the ARC/ recommendation.

Last updated:
15/12/2014

Link:
https://www.easa.europa.eu/en/faq/19048

Can the extension of an ARC be anticipated more than 30 days?

Answer

Assuming the aircraft satisfies the conditions for extension established in M.A.901 or ML.A.901, 30 days is the maximum allowed period for which the ARC extension can be anticipated without losing the continuity of the airworthiness review pattern. This means that the new expiry date is established as one year after the previous expiry date (AMC M.A.901(c)2, (e)2 and (f), ML.A.901(d)).

If the extension is anticipated by more than 30 days, the new expiry date will be established as one year after the date of extension.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19050

Can an Airworthiness Review Staff (ARS) perform an airworthiness review on an aircraft in which he/ she had released some maintenance as Certifying Staff (CS)?

Answer

To avoid possible conflict of interests, the ARS (Airworthiness Review Staff) should not be or have been involved in the release of the maintenance for the aircraft on which he or she intends to perform the airworthiness review (AR), except in one of the following cases:

1. Such maintenance has been released as part of the airworthiness review's physical survey of the aircraft (e.g. release necessary after visual inspections requiring panel opening);
2. Such maintenance has been released as a result of findings discovered during the physical survey of the aircraft (defect rectification)
   ***Note**: cases 1 and 2 are justified by the fact that such specific maintenance activity is part of the* AR and therefore does not require independence between maintenance and the AR.
3. Such maintenance has been released as part of the 100-h/annual inspection contained in the maintenance programme conducted together with the Airworthiness Review of the Part-ML aircraft:
   - by an approved maintenance organisation (145.A.75(f) or CAO.A.095(c)(2)) (see also ML.A.901(b)(3)); or
   - by independent certifying staff holding an ARS authorisation (see ML.A.901(b)(4)) for aircraft operated under Annex VII (Part-NCO) to Regulation (EU) No 965/2012 or, for balloons not operated under Subpart-ADD of Annex II (Part-BOP) to Regulation (EU) 2018/3951 or for sailplane, not operated under Subpart DEC of Annex II (Part-SAO) to Regulation (EU) 2018/1976.

Remark

From regulatory perspective, cases 1 and 2 are explicitly considered by 'AMC M.A.707(a)' and 'AMC1 CAMO.A.310(a)' [2nd bullet of point (5), respectively point (e)] for an ARS belonging to a CAMO also holding a AMO approval. Although not explicitly mentioned in any AMC, considering the Note above, the Agency understands that this principle is also permitted in other cases where the ARS happens to be also Certifying staff (including independent certifying staff).

Remark:
Iaw M.A.901(l) or ML.A.903(b), when the ARS is not Certifying Staff, he/she must be assisted by a

Certifying Staff to release the maintenance mentioned in cases 1 and 2.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19049

Can the airworthiness review certificate (ARC) of the Part-M aircraft be extended during the extensive maintenance/long term storage?

Answer

An ARC extension could be performed as long as:

1. the conditions established for controlled environment (M.A.901 (b)) are met. This means:
    a. continuously managed during the previous 12 months by a unique CAMO or CAO, and
    b. maintained for the previous 12 months by Part-145, Part-M Subpart F or Part-CAO organisations.

AND

2. there is no evidence or reason to believe that the aircraft is not airworthy, as stated in M.A.901(j).

Thus, the procedure for the extension established in the CAMO or CAO has to address verification of the compliance with 3 above mentioned conditions. An aircraft going through the lengthy maintenance/modification or long-term storage is not considered to meet the condition number 2.

Last updated:
29/01/2021

Link:
https://www.easa.europa.eu/en/faq/19062

Is an aircraft considered to be in controlled environment at the end of the ARC validity when that aircraft was received by the CA(M)O during the 90/30 days anticipation of the ARC issue/extension performed by the preceding CA(M)O?

Answer

CA(M)O 1 uses the anticipation when performing the airworthiness review or extension for 90 or 30 days correspondingly. After the issue or extension of the ARC, the aircraft is transferred during the anticipation period from CA(M)O 1 to CA(M)O 2. As the consequence CA(M)O 2 has solely continuously managed the aircraft for more than 12 months due to the term of the validity of the ARC accordingly being more than 12 months. Are the requirements of the M.A.901(b) point 1 satisfied?

The intent of the point M.A.901(b) point 1 is to define the ‘controlled environment’ (see also ML.A.901(c)(1)) by indicating that the aircraft must be managed during last 12 months by unique

CA(M)O, which indirectly refers to a standard term of validity of the ARC. Therefore, if the aircraft has been managed by more than one CA(M)O since the date of issue of the last ARC or the date of issue of the ARC extension, it actually indicates that controlled environment was discontinued.

In addition, in accordance with M.A.901(n) or ML.A.903(d) the 90 days anticipation for the ARC issue shall be used to allow the physical review to be performed during a maintenance check. Hence the intention of the rule is not to address the transfer of the aircraft within those 90 days with the purpose of avoiding the forthcoming airworthiness review.

Concerning the ARC extension and its 30 days anticipation, point M.A.901(f) [AMC M.A.901(c)2, (e)2 and (f)] or ML.A.901(d) are intended for 2 consecutive extensions by the same CA(M)O managing the continuing airworthiness of the aircraft from the date of issue of the ARC. Therefore, an ARC extended for the first time by an organisation cannot be extended a 2nd time by another organisation, because this constitutes a ‘breach’ in controlled environment.

Last updated:
29/01/2021

Link:
https://www.easa.europa.eu/en/faq/19063

Are EASA Forms 1 required during the import in the EU of an aircraft subject to Part-M?

Answer

For the import of an aircraft in the EU under Part-M regime, the provisions of M.A.904 require the accomplishment of an airworthiness review in accordance with point M.A.901.

Note: AMC M.A.904(a)(2) defines specific elements to be considered for imported aircraft.

However, when performing the airworthiness review of an imported aircraft in accordance with point M.A.901 and its AMC, it may happen that ‘AMC M.A.901(k)’ is not fully satisfied in which certain components subject to the review may not hold an EASA Form 1 (or equivalent under a bilateral agreement) In such a case, other component releases to service or serviceable tags may be acceptable for the competent authority of the importing Member State.

Nevertheless, it is important to ensure that the information required by M.A.305(c) and (d) related to the status of ADs, life accumulated by life-limited parts and time-controlled components, modifications and repairs is available.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19060

Technical records

Is there any European requirement to maintain the back-to-birth traceability for any component fitted to an European aircraft?

Answer

The term “back to birth” is not used in European regulations. The requirements that apply to a life-limited part or a service life-limited component (see definition in ML.A.503(a)) are basically stated in M.A.305 (d)&(e) or ML.A.305(e). All detailed maintenance records of a maintenance action (e.g. a restoration) must be kept until another maintenance action equivalent in scope (another restoration) is done, but never less than 36 months. Keep in mind that:

- a life-limited part or service life-limited component log card must be kept with all the relevant information, so the action should be recorded there, and
- the records showing compliance with other requirements stated in M.A.305 or ML.A.305, e.g. an airworthiness directive, or any other information that could be affecting the configuration of the aircraft, must be retained too.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19043

What does the term “detailed maintenance records” mean?

Answer

There has been a certain confusion about the understanding of “detailed maintenance records”, because this term is used in a different context for continuing airworthiness management and approved maintenance organisation (AMO).

“Detailed maintenance records” as defined in M.A.614, 145.A.55(c) or CAO.A.90(a) are required to be kept by an AMO (respectively Part-M/F organisation, Part-145 organisation or CAO with maintenance privileges). Maintenance organisations are required to retain all detailed records in order to be able to demonstrate that they maintained aircraft and components in compliance with applicable requirements (see also remark).

“Detailed maintenance records” as defined in M.A.305(e)(2) or ML.A.305(h)(1) are those records, coming from the AMO1 having performed maintenance, required to be kept by the owner/operator (or the CAMO or CAO with Continuing airworthiness management privileges when required by M.A.201 or ML.A.201) allowing to determine the aircraft configuration, the airworthiness status of the aircraft and all components installed, as well as to plan future maintenance as required by the AMP, based on the last accomplishment.

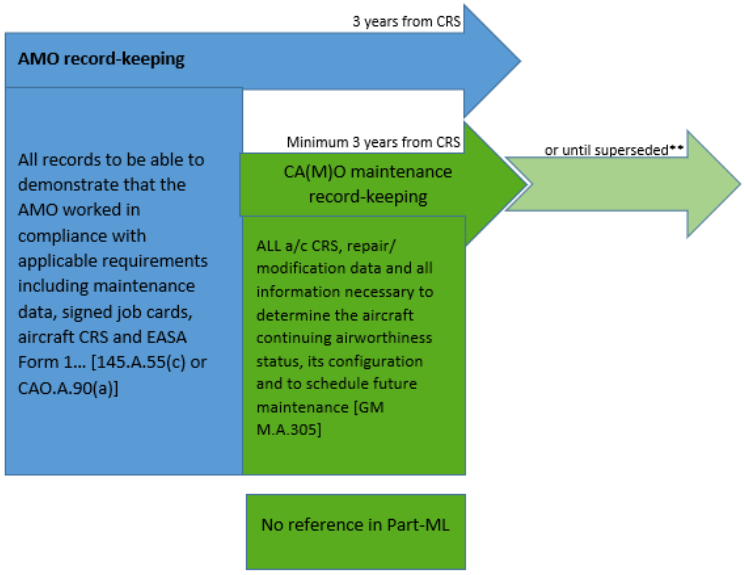
Consequently, the AMO should transmit to the owner/operator/CA(M)O a certain subset of the AMO maintenance records, including the certificates of release to service and repair/modification data related to the performed maintenance, so that the owner/operator/CA(M)O can demonstrate compliance with M.A.305 or ML.A.305.

Not all AMO maintenance records need to be transferred from the AMO to the owner/operator unless they specifically contain information relevant to aircraft configuration/status and future maintenance. Thus, incoming certificates of conformity, batch number references and individual task card sign-offs verified by and/or generated by the maintenance organisation are not required to be transferred to the owner/operator/CA(M)O. However, dimensional information contained in the task card sign-offs or

work packages may need to be transferred and kept by the owner/ operator.

It is to be noted that the record-retention period requirements are slightly different for the AMO and the CAMO and CAO with Continuing airworthiness management privileges. The AMO shall retain the records for 3 years, whereas the CAMO and CAO with Continuing airworthiness management privileges has to retain their records until they are superseded by new information (equivalent in scope and detail), but not less than 3 years. The starting point in both cases is when the aircraft or component maintenance has been released.

Remark: It is considered a best practice as part of the AMO record-keeping system, (and it is also required by certain competent authorities) to record information (e.g. batch number or other tracking reference) relevant to the identification of all standard parts and material used during any maintenance. This practice may limit safety and industrial risks in the case where a batch is recalled by the manufacturer. Such record does not need to be transmitted to the owner/operator/CAMO/CAO with Continuing airworthiness management privileges.



*: Transmitted records is a subset of AMO maintenance records provided to the CA(M)O. Certain transmitted records do not need to be kept as a record by the CA(M)O such as EASA Form 1 for a component with no scheduled maintenance task selected and not subject to AD or modification/repair.

**: by new information equivalent in scope and detail

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[1]*Or pilot-owner [M.A.803 or ML.A.803], or independent certifying staff [M.A.801(b)point 1 or ML.A.801(b)(2)]*

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19042

Is there an obligation to keep the EASA Form 1 for on-condition components?

Answer

There is no specific requirement to retain the EASA Form 1 of such components unless needed to comply with the requirements set forth in M.A.305(e) or ML.A.305(h) for determining the continuing airworthiness and configuration of the aircraft.

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/19103

AMP (Aircraft Maintenance Programme)

What are the main principles governing the development of the AMP under Part-ML?

Answer

For aircraft complying with Part-ML (refer to Article 3(2) of Regulation (EU) No 1321/2014, the AMP should be based either on the applicable ICA or on the Minimum Inspection Programme (MIP) defined in ML.A.302(d).

The owner, when she/he has not contracted the continuing airworthiness management to a CAMO or CAO [see ML.A.201(f)], should 'declare' the AMP assuming responsibility for its content. Such declared AMP does not need to be sent to the competent authority. Except for the mandatory requirements (see also remark below) the owner may decide, under his/her full responsibility, to deviate from the applicable scheduled maintenance recommendations (including ICA if the AMP is not based on the MIP) without the need to justify such deviation(s) **(see GM1 ML.A.302)**.

If the aircraft is managed by a CAMO or CAO, such organisation should 'approve' the AMP. Deviations from the applicable scheduled maintenance recommendations (including ICA if the AMP is not based on the MIP) should be justified and properly recorded.

In both scenarios though (AMP declared by owner or approved by CAMO/CAO), when the AMP is not based on the MIP, the deviations to the applicable ICA **shall not result in a less restrictive** task than the corresponding MIP task. A clear overview of the different options for the development (including the source of information and potential customisation) and approval of such an AMP is provided by 'GM1 ML.A.201', 'GM2 ML.A.302'.

In addition, the AMP shall be reviewed annually. For declared AMP, this review should be done by the person who performs the airworthiness review during its accomplishment (see AMC1 ML.A.302(c)(9)). For approved AMP, the review can be done either by the Airworthiness Review Staff (ARS) during the airworthiness review or by the CAMO itself.

If during the airworthiness review it is observed that there are discrepancies on the aircraft linked to deficiencies in the content of the aircraft maintenance programme, the AMP must be amended. The competent authority shall be informed in the case where the ARS does not agree with the measures taken to amend the AMP.

Remarks:

In accordance with ML.A.302 and in particular ML.A.302(c)(4), the AMP, declared or approved, shall in all cases include all the mandatory maintenance/continuing airworthiness requirements, such as

repetitive Airworthiness Directives or the Airworthiness Limitation Section (ALS).

References:

Please refer also to ‘AMC2 ML.A.302’ (EASA Form AMP), ‘GM1 ML.A.302’ and ‘AMC1 ML.A.302(d)’ (content of MIP).

Last updated:
21/06/2019

Link:
https://www.easa.europa.eu/en/faq/43423

When does the calendar interval for the next aircraft or component maintenance task start?

Answer

In a normal scenario :

- The date of signing the certificate of release to service (CRS) should be considered to be the date of the accomplishment.
- The next due date should be calculated using this date.

However, there may be different considerations that render the normal scenario no longer applicable. For example:

Case 1: The interval of the maintenance task has been previously subject to a one-time extension using an approved procedure included in the aircraft maintenance programme (refer to Appendix I to AMC M.A.302 point 4) normally called ‘permitted variation’ or ’tolerance’. In this case the next due date should be calculated using the previous due date (as opposed to accomplishment date) or as agreed by the competent authority.

For aircraft regulated by Part-ML the situation is different when applying the tolerance of 1 month foreseen in ML.A.302(d), the next interval shall be calculated from the accomplishment date (refer to ML.A.302(d)(1) and AMC1 ML.A.302(d)).

Case 2: The maintenance task refers to a component maintenance task, for example the landing gear overhaul. In this case the start of the interval would be the date of the release to service after the overhaul of the landing gear or in some particular cases when specified in the maintenance data the interval may start from the date of installation on aircraft.

Case 3: The task is released as part of a maintenance check/visit, where the duration of the check/visit is significant compared to the interval of the task. In this case, there may be significant difference between date of accomplishment and date of release. For example, a check/visit that lasts for 2 months and an inspection that has an interval of 3 months. In this case, either the task is carried out on the last days of the maintenance check/visit and the next due date is calculated from the CRS, or the task is carried out at the beginning of the visit and the next due date should be calculated from the date of accomplishment.

There may be other examples, but the key principle is to use sound engineering judgment and the guidance provided in the Instructions for Continuing Airworthiness to calculate the next due date.

Last updated:

02/02/2021

Link:
https://www.easa.europa.eu/en/faq/19102

When should I revise my Aircraft Maintenance Programme (AMP)?

Answer

Part-M:

In accordance with M.A.302(h), the Aircraft Maintenance Programme (AMP) shall be subject to 'periodic reviews' and amended accordingly when necessary.

This means that the owner/operator/CA(M)O should review at a regular interval:

- new/modified maintenance instructions by the TC holder,
- modifications and repairs embodied in the particular a/c, which may require compliance to additional maintenance instructions (by Design Approval Holder),
- in-service experience collected for the particular a/c or for the fleet and
- changes in the type and specificity of operations.

Such a review allows to determine if an AMP revision is necessary to still comply with the obligations of M.A.302(h), and ensure that the AMP continues to be valid in light of the operating experience. As a minimum, point (3) of AMC M.A.302 states it should be at least annually.

However, this should not prevent amending the AMP outside of this formal periodic review, when a specific need arises. This may depend for example on in-service experience (e.g. adverse trend), nature of instruction revisions (e.g. significant reduction of TBO (time between overhaul)), the extent of instruction revisions (amount of affected tasks) as well as source of instruction revisions (e.g. MRBR, ALS, etc.)

When a revision of the ALS (Airworthiness Limitation Section) introduces a new or more restrictive task, EASA has the policy to issue an AD (Airworthiness Directive). Such an AD would typically mandate on one side the revised task accomplishment and on the other side the revision of the AMP itself, together with a compliance time for these two actions.

However, in accordance with point (3) of AMC M.A.302, EASA recommends to review the AMP as soon as possible in this case to avoid a disconnection between accomplished maintenance task(s) and maintenance task(s) listed in the AMP.

If the aircraft's continuing airworthiness is being managed by a CA(M)O, the CA(M)E (Continuing Airworthiness Management Exposition/Combined Airworthiness Exposition) should describe the AMP revision policy (including 'periodic review') under point 1.2 [Appendix V to AMC M.A.704], point 1.2 [AMC1 CAMO.A.300] or point D.3 [AMC1 CAO.A.025].

Remark: In the case where the source documents are amended without having an effect on the AMP content, it is acceptable to use an indirect approval procedure (if granted by the competent authority in accordance with M.A.302(c)) to amend the relevant source document references in the AMP.

Part-ML:

ML.A.302(c)(9) requires an annual review of the AMP.
For aircraft regulated by Part-ML the review of the AMP may be carried out with the airworthiness review (AR) of the aircraft by the person who performs such AR.

Such a review allows to determine if an AMP revision is necessary to still comply with the obligations of ML.A.302(c) or ML.A.302(d) and ensure that the AMP or MIP continues to be valid in light of the operating experience. As a minimum, ML.A.302(c)(9) states it should be at least annually.

However, this should not prevent amending the AMP outside of this formal periodic review, when a specific need arises. This may depend for example on in-service experience (e.g. adverse trend), nature of instruction revisions (e.g. significant reduction of TBO (time between overhaul)), the extent of instruction revisions (amount of affected tasks) as well as source of instruction revisions (e.g. MRBR, ALS, etc.)

However, in accordance with ML.A.302(c)(9), EASA recommends to review the AMP as soon as possible in this case to avoid a disconnection between accomplished maintenance task(s) and maintenance task(s) listed in the AMP.

If the aircraft's continuing airworthiness is being managed by a CA(M)O, the CA(M)E (Continuing Airworthiness Management Exposition/Combined Airworthiness Exposition) should describe the AMP revision policy (including 'periodic review') under point 1.2 [Appendix V to AMC M.A.704], point 1.2 [AMC1 CAMO.A.300] or point D.3 [AMC1 CAO.A.025].

Remark:

AMP regulated by Part-ML are declared by the owner or approved by the CAMO or CAO (ML.A.302(b)).

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/47406

Can a competent authority require the owner/CAMO/CAO to include national requirements in the Aircraft Maintenance Programme (AMP), based on M.A.302(d)(1)?

Answer

Although the Member State's competent authorities are responsible for approving the AMP, the intention of the rule is that they should not impose aeronautical instructions (such as national requirements) in addition to the instructions for continuing airworthiness (ICA) issued by the design approval holder during the certification process with the Agency. The Agency is, on behalf of the Member States, the competent authority for initial airworthiness as per Article 77(1) of Regulation (EU) 2018/1139 (the EASA 'Basic Regulation'). Following M.A.302(d)(2), those ICA shall be the basis to develop an AMP.

Nevertheless, competent authorities may issue alternate instructions to ICA when such instructions aim to offer flexibility to the operator [AMC M.A.302(d) point (2)].

Additionally, the mentioned AMC facilitates the rare case, where there has been no ICA issued by the design approval holder for a particular aircraft, modification, repair or STC (Supplemental Type Certificate): competent authorities may issue relevant instructions for the AMP in this case.

Remarks:

- The airworthiness (initial and continuing) of the aircraft for which the Basic Regulation is not

applicable, has to comply solely with the national rules of the state of registry; and
- There is no equivalent of US CFR Title 14 Part-43 Appendix E/Part-91 (§91.411) or Part-43 Appendix F/Part-91 (§91.413) in the EU system.

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/47696

How is it possible to escalate AMP task intervals?

Answer

Part-M

General:

Some general expectations for escalation initiatives are described in the following paragraph:

a) It should be ensured that the AMP continues to be valid in light of the operating experience [M.A.302(h) – see FAQ n.47406].

b) It should form part of the analysis of the effectiveness of the AMP (if required by M.A.301(e)),

c) The AMP should include a procedure to manage the escalation of established intervals [AMC M.A.302 point (4) and point (2) of AMC M.B.301(c)].

Supported by a formal reliability programme if required by M.A.302(g) or voluntarily implemented [AMC M.A.302(d) point (6)] or collection and analysis of in-service experience.

'Appendix I to AMC M.A.302 and AMC M.B.301(b)' provides detailed guidelines for the integration of this information into the AMP.

d) If there is a CA(M)O involved, those points also have to be emphasised within the CA(M)E, as specified in Appendix V to AMC1 M.A.704, AMC1 CAMO.A.300 or AMC1 CAO.A.025.

Two different cases:

The escalation of AMP task intervals falls into the alternative instructions proposed by the owner/CA(M)O [M.A.302(e)] and distinguishes in the following cases:

Case 1:

Escalation of safety-related task intervals, which consist of all mandatory tasks (Airworthiness Limitation Section) as well as certain non-mandatory tasks issued by the DAH (Design Approval Holder) such as various MRBR (Maintenance Review Board Report) tasks [see note below], tasks related to emergency equipment, critical components…

Case 2:

Escalation of non-safety-related task (e.g. non-safety related MRBR task or a task recommended by a Service Letter) intervals

Note:
In cases, where the aircraft type has been subjected to the MRB process, the following MRBR tasks should be considered safety-related:

- *Failure Effect Category (FEC) '5' (evident safety) and '8' (hidden safety) tasks (systems and powerplant)*
- *SSI (Structural Significant Item) tasks*
- *L/HIRF (Lightning / High Intensity Radiated Field) tasks (as applicable)*
- *Stand-alone EWIS tasks (EZAP procedure)*

Escalation approval:

The approval of a task escalations is addressed separately for each case:

Regarding case 1:

1.1 Escalation of mandatory tasks represents a change of the initial type design and therefore must be discussed and agreed between the DAH and the Agency*.
1.2 The AMP revision proposal and the information used to substantiate the escalation of non-mandatory tasks [AMC M.B.301(b)(6)] have to be evaluated by the competent authority [AMC M.B.301(b) point (2)]. Following a positive evaluation, a direct approval of the AMP revision will be issued by the competent authority, as stated in M.A.302(e).

Regarding case 2:

An **indirect approval** of the AMP through a CA(M)O is possible and described in more detail in FAQ n.19061.

** Exception may exist under certain condition for Two Star CMR (Certification Maintenance Requirement) (see AMC 25-19).*

Remarks:

- In all cases, task de-escalation may need to be considered based on the supporting data [AMC M.A.302(g) point (4)].
- Escalation should not be confused with 'permitted variations' to AMP intervals, which applies to a unique aircraft for a unique occasion ['Appendix I to AMC M.A.302 point (4)].

Part-ML

General:

Some general expectations for escalation initiatives are described in the following paragraph:

a) It should be ensured that the AMP continues to be valid in light of the operating experience [[ML.A.302(c)(9) – see FAQ n.47406].

b) The effectives of the AMP should be assessed at least by an annual review [ML.A.302(c)(9)].

c) The AMP may include additional maintenance actions [ML.A.302(c)(3)] supported by collection and analysis of in-service experience.

'GM1 ML.A.302(c)(3)' provides detailed guidelines for the integration of this information into the AMP.

d) If there is a CA(M)O involved, those points also have to be emphasised within the CA(M)E, as specified in Appendix V to AMC M.A.704, AMC1 CAMO.A.300 or AMC1 CAO.A.025.

Two different cases:

The escalation of AMP task intervals falls into the alternative instructions proposed by the owner/CA(M)O [GM1 ML.A.302(c)(2)(b)] and distinguishes in the following cases:

Case 1:

Escalation of safety-related task intervals, which consist of all mandatory tasks (Airworthiness Limitation Section) as well as certain non-mandatory tasks issued by the DAH (Design Approval Holder), tasks related to emergency equipment, critical components...

Case 2:

Escalation of non-safety-related task (e.g. task recommended by a Service Letter) intervals

Escalation approval:

The approval of the escalation is carried out by the CAMO or CAO [ML.A.302(b)(2)]. For declared AMP no approval is needed [ML.A.302(b)(1)].

Remarks:

- In all cases, task de-escalation may need to be considered based on the supporting data.
- Escalation should not be confused with 'permitted variations' to AMP intervals, which applies to a unique aircraft for a unique occasion [GM1 ML.A.302(c)(3)].

Last updated:
02/02/2021

Link:
https://www.easa.europa.eu/en/faq/48248

What kind of alternative (other than escalation) or additional instructions can be introduced in the AMP?

Answer

For guidance on the escalation of AMP task intervals, please refer to FAQ no.48248.

Examples of alternative/additional instructions to the Design Approval Holder's (DAH) Instructions for Continuing Airworthiness (ICA) are listed below [see point (7) of AMC M.A.302(d):

1. De-escalation of task intervals (i.e. 'more restrictive intervals'). Regardless of the source of the task, this may be eligible to indirect approval [see FAQ n.19061].

2. Additional scheduled maintenance tasks selected by the operator on voluntary basis (e.g. operator policy for interiors), or manufacturer recommendations outside ICA (e.g. Service Letter) linked to product improvements or maintenance practices... Depending on their nature, those tasks may be added, changed and deleted through the indirect approval [see FAQ n.19061].

Remark:

Additional and de-escalated tasks may originate from the reliability programme as indicated in point (4) of AMC M.A.302(g).

3. Concerning changes in task type (e.g. from General Visual Inspection to Detailed Inspection, or from Operational Check to Functional Check), by analogy with the escalation [see FAQ no.48248] EASA recommends that for safety-related tasks such changes are directly approved by the competent authority. For non-safety related tasks, the competent authority may accept an indirect approval.

For Part-ML aircraft, the principles of the AMP development are described in FAQ n.43423.

Last updated:

02/02/2021

Link:
https://www.easa.europa.eu/en/faq/48249

CAMO (Continuing Airworthiness Management Organisation)

Are deputies to nominated persons required in CAMO or CAO?

Answer

Part-M Subpart G, Part-CAMO and Part-CAO do not contain specific requirements for the identification of deputies to “nominated persons” as it is foreseen in Part-145 (145.A.30(b)(4)).

Nevertheless, the CAMO or CAO needs to take into account the conditions for the continued validity of the approval laid down in M.A.715, CAMO.A.135 or CAO.A.110, in particular in case of findings or in case of changes.

The CAMO or CAO should ensure that they remain in compliance even during short/medium absence of the nominated persons, this could be achieved by identifying in the CAME or CAE “one or several deputies” and the conditions under which the deputies will assume such responsibility. For longer absence of the nominated person, it is recommended to identify a new nominated person. For Part-M Subpart G organisations, the nomination and acceptance by the competent authority is done using the EASA Form 4. For Part-CAMO and Part-CAO approvals no EASA Form 4 is foreseen and the acceptance by the competent authority is formalised by the approval of an amendment to the exposition.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19046

Under which condition can a CAMO or CAO use the indirect approval procedure to amend AMP (Aircraft Maintenance Programme) task(s) under Part-M?

Answer

The indirect approval procedures may only be used for:

- non-safety-related tasks as described in case 2 of FAQ n.48248 and example 3 of FAQ n.48249

- de-escalated tasks as described in example 1 of FAQ n.48249

- additional tasks as described in example 2 of FAQ n.48249

- editorial issues, typos, etc., (without having an effect on the AMP content)

In such case, as required by M.A.302(c) and M.B.301(c), the CAME (Continuing Airworthiness Management Exposition) or CAE (Combined Airworthiness Exposition) must include, and the

competent authority shall approve, a procedure describing as a minimum:

- which AMP amendments are eligible for indirect approval;
- who in the organisation is responsible to issue the indirect approval;
- how the amendments are controlled; and
- how and when the competent authority is informed of an AMP amendment.

Based on M.A.302(c), the indirect approval may only be used when:

- the aircraft is managed by a CAMO/CAO or there is a limited contract between the owner and the CAMO/CAO for the development and approval of the AMP;
- and
- the aircraft managed by the CAMO/CAO is registered in the Member State ensuring the oversight of this CAMO/CAO (unless an agreement exists between the competent authority for the AMP and the competent authority of the CAMO/CAO).

Remark

AMPs regulated by Part-ML are not subject to an approval by the competent authority.

Last updated:

29/01/2021

Link:

https://www.easa.europa.eu/en/faq/19061

Does the CAMO or CAO compliance monitoring/quality system need to be subject to internal audit?

Answer

Yes, the compliance monitoring/quality system is part of the activities of the CAMO or CAO and therefore it should be monitored by internal audit.

Points M.A.712(b), CAMO.A.200(a)(6) or CAO.A.100(b) requires that the compliance monitoring/quality system monitors the compliance of the organisation with its relevant requirements and procedures.

The compliance monitoring/quality procedures are considered to be within the scope of this monitoring function. Therefore, the compliance monitoring/quality system should also be subject to audits and the CAMO or CAO audit programme/plan needs to reflect this.

Besides that, the audits conducted in respect of the compliance monitoring/quality system should satisfy the requirement of independence. This means that audits should be carried out by personnel not responsible for the functions, procedures or products being checked.

So, the compliance monitoring/quality staff cannot audit the compliance monitoring/ quality system themselves because of the necessary independence of the audit. Therefore, to audit the compliance monitoring/quality system, it is acceptable:

- to use competent personnel from a different section/department in the same organisation not responsible for the compliance monitoring/quality function/ procedure, or,
- to contract the independent audit element of the compliance monitoring/quality system to another organisation or a qualified competent person, or,
- that the compliance monitoring/quality system is monitored and certified against an internationally recognised standards by a certification organisation.

The way the compliance monitoring/quality system is going to be audited has to be described in the CAME or CAE and approved by the competent authority.

For a small CAO, as defined in CAO.A.100(e), the quality system may be replaced by regular organisational review. Further information on the organisational review can be found in ‘AMC1 CAO.A.100(f)’ and ‘Appendix II to AMC1 CAO.A.100(f)’.

Last updated:
28/01/2021

Link:
https://www.easa.europa.eu/en/faq/19047

The requirement to establish a procedure to assess non-mandatory modifications/inspections pursuant to CAMO.A.315(b)(4) refers to the “use of the organisation’s safety risk management process”. What does this mean?

Answer

The CAMO has the obligation, for complex motor-powered aircraft and aircraft used by air carriers licensed in accordance with Regulation (EC) No 1008/2008, to establish a procedure to assess non mandatory modifications and inspections (e.g. Service Bulletins).

This assessment should result in a decision to implement or not the recommendation provided in such non-mandatory information (e.g. perform the inspection, embody the modification, amend the aircraft maintenance programme (AMP)).

This assessment procedure should take into consideration several aspects, as the case may be, including but not limited to:

- the applicability to the operator’s fleet (e.g. type of operating environment, utilization, aircraft configuration);
- achievement of operator’s safety objectives;
- mitigating potential aviation safety risks already identified by the operator;
- mitigating potential aviation safety risks not yet apparent to the operator but identified by other operators or TC/STC holder, for aircraft in a similar operational environment;
- reliability improvement of the aircraft and components; and
- improvement of the effectiveness of the AMP.

In case of potential aviation safety risks, the CAMO should review the hazard(s) identified in the recommendation and the proposed maintenance action and its timeframe (i.e. timeline to embody the modification or amend the AMP). This is the main purpose of the expression “making use of the organisation’s safety risk management process”. If necessary, the CAMO will perform a safety risk assessment (e.g. in terms of probability and severity of consequences) and a review of the related mitigations.

Typically, SBs are issued for technical purposes (as mitigation or safety risk control). For instance, a SB could provide the following:

- an elimination of an identified hazard by the embodiment of a modification, or
- reducing the safety risk (i.e. the severity and/or likelihood) of the consequences of an identified hazard by the embodiment of a modification, or

- reducing the likelihood of the consequences of an identified hazard by performing repetitive inspections.

Since SBs are also used for other purposes (e.g. optional equipment installation, commercial retrofit) and not only for potential safety-related situations, it is not required to use safety risk management process for each SB.

The CAMO should use its safety risk management process to determine if the hazard identified in the SB applies to the managed fleet and what the associated risk is, and/or whether the proposed action (modification/inspection) are applicable, effective and reasonable. For clarity, it is not intended that the CAMO should redo the safety assessment performed by the design approval holder; the CAMO assessment should be tailored to its fleet and related operations.

The referred CAME procedure for the assessment of non-mandatory modifications and inspections should ideally describe the decision-making process and mandate to record the decision taken and its justifications (e.g. based on considerations of costs vs benefits such as safety or reliability).

The decision to embody a modification may require the change management process to be followed to ensure proper coordination between the aircraft operator, the CAMO and the approved maintenance organisation. For example, a modification that affects Mass and Balance, requires maintenance check flights, introduces revised flight manual procedures, maintenance manual procedures, changes to the AMP, which needs to be managed to ensure proper dissemination of the information, training, review of existing hazards, and review of risk assessment, as applicable.

Last updated:
04/07/2022

Link:
https://www.easa.europa.eu/en/faq/136743