

Certification of maintenance

With respect to blend out repairs, is it required to record the depth and area dimensions of material removed during a blend out repair or is it sufficient to simply record that the damage has been repaired as per the SRM?

Answer

Yes, the dimensions of the damage and the removed/remaining material should be recorded. This is a very important information in order to assess whether further damage (adjacent or at the same spot) at a later stage would be allowable or not. In addition, it is a safeguard measure in order to be able to determine, during audits, whether the person correctly determined that the damage was within limits.

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Can the subcontractor of a Part-145 or Part-CAO organisation release maintenance?

Answer

One of the fundamentals of subcontracting activities is that, during such maintenance, the Part-145 approval is extended to include the subcontractor activities. Subcontracting can be done only if the Part-145 has approved procedures to do it (145.A.75(b)) and the MOE is amended to reflect this new subcontractor.

A certificate of release to service can be issued by a person from the subcontractor who has received a certification authorisation from the Part-145 organisation in accordance with the certification authorisation procedure of the MOE including the assessment of competence.

The certificate of release to service and the EASA Form 1 will always be issued under the maintenance organisation approval reference.

For maintenance by Part-CAO the situation is different. Only 'specialised services' (e.g. NDT) can be subcontracted to another organisation, in accordance with the appropriate procedure set out in the CAE and approved by the competent authority (CAO.A.095(a)(2)). In accordance with AMC1 CAO.A.025 the procedure should be part of chapter B.7 'Subcontracting'.

A certificate of release to service can be issued by a person from the other organisation who has received a certification authorisation from the CAO in accordance with the certification authorisation procedure of the CAE.

The certificate of release to service will always be issued under the CAO approval reference.

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Release to service of NDT tasks by Part-145 or Part-CAO organisations

Answer

This answer is separated in two tables. One table is for organisation holding a Part-145 approval and the second table is for organisations holding a Part-CAO approval.

Part-145:

Part-145 organisation	Certifying staff required	Qualification system	General Release procedure	Release procedure for an NDT inspection
Aircraft (class A)				A Part-145 organisation holding an A approval rating on a particular aircraft type and having in its approved scope of work NDT inspections for

The release of the aircraft maintenance carried out under A class rating has to be performed by certifying staff holding a | follow Part-66 Part-66 licence. (B1 or B3 or C or L certifying staff under the organisation's A rating.)

Licencing of personnel has to regulation.

this aircraft type.

This organization needs to have part-66 certifying staff and NDT personnel qualified in accordance with 145.A.30(f).

The release is either on the aircraft technical log or issuing an aircraft release to service statement.

In this case the NDT inspector performs the NDT task and signs off the work order. The aircraft is released by appropriately qualified B1, B3, C or L certifying staff under the organisation's A rating.

Please note that the release may include not only the NDT task but also the associated tasks (removal of panels, blankets, wires, reinstallation, etc), or the NDT task may be part of a base maintenance check.

Specialised				A Part-145
services				organisation
				holding a D1
				approval on a
				particular NDT
				method. The
				approved scope
				of work will be
				NDT inspections
			The release of	on this method.
	The release of the maintenance carried out under D1 class rating has to be performed by "specialised services" certifying staff.	The certifying staff is qualified following the procedures established by the organisation in compliance with EN4179, Part-66 licence is not required.	works performed under class D1 rating is done on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the MOE in compliance with 145.A.50 and approved by the competent authority.	This organisation needs to have NDT certifying staff qualified in accordance with 145.A.30(f). In this case the NDT certifying staff performs and releases the NDT task on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the MOE in compliance with 145.A.50 and approved by the competent authority.

Note: In case of non-EU organisations approved by the EASA in accordance with

Part-145, the Part-66 licence could be read as "Part-66 or national licence in accordance with Part-145 Appendix IV"

Part-CAO:

Part-145	Certifying staff	Qualification system	General Release procedure	Release procedure for an NDT
organisation	required			inspection
Aircraft (class aeroplanes, helicopter, airships, balloons or sailplanes)				A Part-CAO organisation holding an aeroplanes, helicopter, airships, balloons or sailplanes particular aircraft type or and having in its approved scope of work NDT inspections for this aircraft type.
	The release of the aircraft			This organization needs to have part-66 certifying staff and NDT personnel qualified in accordance with CAO.A.035(f).
	maintenance carried out under A	personnel has to follow Part-	The release is either on the aircraft technical log or issuing an aircraft release to service statement.	In this case the NDT inspector performs the NDT task and signs off the work order. The aircraft is released by appropriately qualified B1, B3 or L certifying staff under the organisation's aeroplanes, helicopter, airships, balloons or sailplanes

rating.

Please note that the release may include not only the NDT task but also the associated tasks (removal of panels, blankets, wires, reinstallation, etc), or the NDT task may be part of a base maintenance check.

A Part-CAO

organisation holding a components rating approval on a particular engine type or 'components other than complete engines' and having in its approved scope

of work NDT

inspections for this

engine type.

This organization needs to have "engine" or

'components other than complete engines' certifying staff (qualified in accordance with

company

procedures) and NDT personnel qualified in accordance with CAO.A.035(f).

Engines or The certifying

Components staff is

other than qualified

complete following the

engines procedures

Class established by

the

organisation, Part-66 licence

is not required.

The release of the engine maintenance carried out under components

Components

class rating has to be performed by 'engine's'

or

'components other than

The release of works performed under class components is done on an EASA Form 1 (or by means of an internal release document when this component is for the organisation's own use and the organisation has in place the related

complete engines' certifying staff. internal procedures in the CAE).

In this case the NDT inspector performs the NDT task and signs off the work order. The engine or 'components other than complete engines' certifying staff releases the works performed to the engine or 'components other than complete engines' (including NDT inspection) on an EASA Form 1.

The certifying staff is The release qualified of the following the component procedures maintenance established by carried out the under C organisation in compliance class rating has to be with the competent performed authority by components requirements. certifying The CCS is not staff (CCS). required to

have a Part-66

licence.

The release of works performed under class C is done on an EASA Form 1 (or by means of an internal release document when this component is for the organisation's own use and the organisation has in place the related inspector performs internal procedures in the MOE).

A Part-145 organisation holding a C rating approval on a particular component and having in its approved scope of work NDT inspections for this component.

This organization needs to have CCS and NDT personnel qualified in accordance with 145.A.30(f).

In this case the NDT the NDT task and signs off the Work Order / Engineering Order. The CCS releases the works performed to the component (including NDT inspection) on an EASA Form 1.

A Part-CAO

Specialised services

The release The certifying of the maintenance staff is qualified carried out following the under 'Specialised procedures established by Services' the class rating organisation in has to be compliance performed with EN4179, by Part-66 licence "specialised is not services" required. certifying staff.

The release of works performed under class 'Specialised Services' rating is done on an EASA Form 1 or using another form of release qualified in to service (other than aircraft release to service) as defined by the organisation in the certifying staff CAE in compliance with performs and CAO.A.070(a) and approved by the competent authority (AMC1 CAO.A.070 (a) (1)).

organisation holding a 'Specialised Services' approval on a particular NDT method. The approved scope of work will be NDT inspections on this method. This organisation needs to have NDT certifying staff accordance with CAO.A.035(f). In this case the NDT releases the NDT task on an EASA Form 1 or using another form of release to service (other than aircraft release to service) as defined by the organisation in the CAE in compliance with CAO.A.070 and approved by the competent authority.

Note: In case of non-EU organisations approved by the EASA in accordance with Part-145, the Part-66 licence could be read as "Part-66 or national licence in accordance with Part-145 Appendix IV"

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