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Foreign Part-145 approvals - User Guide for Applicants & Approval Holders

UG.CAO.00006-007

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DOCUMENT CONTROL SHEET**Reference documents****a) Contextual documents**

Applicable regulation are listed in the form "FO.CAO.00136 - Foreign Part-145 approvals-Documentation Index" last revision.

b) Internal documents

Applicable regulation are listed in the form "FO.CAO.00136 - Foreign Part-145 approvals-Documentation Index" last revision.

Log of issues

Issue	Issue date	Change description
001	14/07/2010	First issue (Reissue of QMS Procedure S.P041)
002	13/11/2013	Reorganization and update of Foreign Part-145 procedures structure
003	01/09/2014	Update of Quality documents to implement the new corporate image of the Agency and the changes to the organization structure.
004	22/10/2015	Endorsement of comments received from stakeholders
005	13/10/2017	Endorsement of following topics/changes: findings corrective action process, communication in electronic format with applicants and approval holders, draft audit report at the closing meeting, shared audit process, endorsement of comments received from stakeholders
006	27/05/2019	<ul style="list-style-type: none"> Corporate identity of the Agency changed to European Union Aviation Safety Agency Management of approval with IFP (Inspection & Finding Platform) Introduced flexibility in the 3 months due date for initial/change audit findings
007	05/03/2020	<ul style="list-style-type: none"> Removal of fee level information





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0. Introduction.





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0.2. Definitions and abbreviations.

Abbreviations	
AMC	ACCEPTABLE MEANS OF COMPLIANCE
AMO	APPROVED MAINTENANCE ORGANISATION
AMTO	APPROVED MAINTENANCE TRAINING ORGANISATION
AOG	AIRCRAFT ON GROUND
BIPM	INTERNATIONAL BUREAU OF WEIGHTS AND MEASUREMENTS
CAO	CONTINUING AIRWORTHINESS ORGANISATION
CAP	CORRECTIVE ACTION PLAN
CIPM	INTERNATIONAL COMMITTEE ON WEIGHTS AND MEASUREMENTS
C/S	CERTIFYING STAFF
CC/S	COMPONENT CERTIFYING STAFF
EASA	EUROPEAN UNION AVIATION SAFETY AGENCY
EU	EUROPEAN UNION
GM	GUIDANCE MATERIAL
IFP	INSPECTION & FINDING PLATFORM
ILAC	INTERNATIONAL LABORATORY ACCREDITATION COOPERATION
IORS	INTERNAL OCCURENCE REPORTING SYSTEM
MOA	MAINTENANCE ORGANISATION APPROVAL
MOAP	MAINTENANCE ORGANISATION APPROVAL PROCEDURES
MOC	MAINTENANCE OVERSIGHT COORDINATOR
MOE	MAINTENANCE ORGANISATION EXPOSITION
MOR	MANDATORY OCCURRENCE REPORTING
MRA	MUTUAL RECOGNITION ARRANGEMENT
NAA	NATIONAL AVIATION AUTHORITY
NRAB	NATIONAL RECOGNISED ACCREDITATION BODY
OEM	ORIGINAL EQUIPMENT MANUFACTURER
PPB	PRINCIPAL PLACE OF BUSINESS
QE	QUALIFIED ENTITY
RAB	REGIONAL ACCREDITATION BODY
S/S	SUPPORT STAFF
STCH	SUPPLEMENTAL TYPE CERTIFICATE HOLDER
TCH	TYPE CERTIFICATE HOLDER
WH	WORKING HOURS
WHOC	WORKING HOURS EASA OVERSIGHT COORDINATOR





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0.3. Scope and applicability.

EASA is the Competent Authority for maintenance organisations having their principal place of business located outside the EU, as established by EASA Part 145.1 “General” and is therefore responsible for the final approval of these maintenance organisations and for establishing procedures detailing how these EASA Part-145 applications and approvals are managed.

This user guide is applicable to EASA Part-145 applicant and EASA Part-145 AMOs’ (hereafter referred as maintenance organisations) having their principal place of business located outside the EU Member States and which are not certified under the provisions of a bilateral agreement signed with the EU.

The provisions of this user guide are complementary to the requirements of Part-145 regulation “as amended” and does not supersede or replace the associated regulatory requirements.

0.4. Purpose.

The purpose of this user guide is to describe how the maintenance organisation shall proceed when applying for an EASA Part-145 approval and how EASA will handle the initial investigation, the continued oversight of the approval of the maintenance organisation according to Part-145 regulation.

0.5. Entry into force

This user guide comes into effect 30 days after publication on the EASA website.

0.6. Associated instructions

EASA has developed associated instructions (user guides, Forms, templates and work instructions), that detail specific matters, which have to be considered as an integral part of this user guide.

A complete listing of these documents, together with their applicability to the maintenance organisation or NAA / QE / EASA, is addressed in the current revision of the “Foreign Part-145 approvals – documentation Index”, FO.CAO.00136-XXX (XXX identifies the revision number). Documents which are applicable to both NAA/QE/EASA and maintenance organisation are made available on the EASA Web Site (<http://easa.europa.eu>) - Continuing Airworthiness Organisations page.

Each time a cross reference is provided to another document or another chapter / paragraph of the same document, this reference is identified with **grey text**.

0.7. Communication.

All documents and correspondences between the maintenance organisation, the accredited NAA/QE and EASA shall be in the English language.





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0.8. Management of approvals by EASA

The Inspection & Finding Platform is an IT tool which is being used for the management of approvals, including issuance of audit reports and findings management.

A phased approach is being used by EASA to introduce the approvals in the IFP tools. Therefore for a certain period of time, there will be approvals managed within and outside IFP.

All CAO User Guides have a general applicability regardless if an approval is managed within or outside IFP.

Whenever a difference applies, which requires a dedicated procedure for approvals managed in IFP, the related procedure will be identified as indicated below:

Approvals
in IFP

Text of the dedicate procedure for approvals managed in IFP





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1 Initial approval.





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1.1 Application.

A new application for an EASA Part-145 maintenance organisation approval shall be made in accordance with Section A of EASA Part-145 by using the EASA Form 2. This Application form shall be sent directly by e-mail to EASA via the 'foreign 145' email box (foreign145@easa.europa.eu), by surface mail, fax or online through EASA website. Details about on the EASA's regulation related to fees and charges can be found on the EASA website (www.easa.europa.eu).

EASA Applicant Services Department will acknowledge receipt of the application for applications not received via the 'Foreign 145' mailbox (foreign145@easa.europa.eu) or "online", from which an acknowledgement of receipt is automatically sent. The EASA Department responsible for the administrative and financial matters will check the application. When incorrect or incomplete information is supplied, The EASA Department responsible for the administrative and financial matters shall notify the maintenance organisation as soon as possible by email detailing the omissions and errors. In case of refusal of an application, The EASA Department responsible for the administrative and financial matters will notify this decision in writing to the maintenance organisation together with the reasons thereto.

According to the EASA "General Conditions and Terms of Payment" document:

- all communications from EASA to applicants and approval holders will be in electronic format only (including formal notifications, approval letters, decisions for suspension, etc.);
- only the original certificates (original EASA Form 3 will be sent by surface email (with an advance copy in electronic format).

Once the application package is complete, the EASA CAO section checks the technical eligibility of the application according to EASA Part-145 regulation. An initial application package must include:

- The EASA Form 2 available on EASA Web site: Web Site (<http://easa.europa.eu>) - Continuing Airworthiness Organisations page.
- The Certificate of Incorporation (certificate of trade registration) as detailed on the EASA Form 2 with a translation in English. A courtesy translation may be accepted. The Certificate of Registration is aimed to demonstrate the Principal Place of Business and the legal entity name.

When eligibility has been fully assessed, The EASA Department responsible for the administrative and financial matters calculates the fees according to the current fees and charges Regulation and:

- sends the "initial application invoice" to the maintenance organisation.
- provides the preliminary approval number with a suffix "P" indicating the pending status of the approval (for example EASA.145.XXXXP);
- Confirms the receipt of payment of any fees associated with the application. Missing the payment of the invoice within the terms prescribed by EASA would result in the termination of the application

Note: For any administrative issue such as those related to fees and invoices, the maintenance organisation shall directly contact The EASA Department responsible for the administrative and financial matters.





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1.2 Allocation of the investigation team.

Once the payment of the invoice has been confirmed by The EASA Department responsible for the administrative and financial matters, the CAO decides if the application is to be further processed internally by an EASA inspector or if the technical investigation is to be allocated to an external party.

In case the technical investigation is allocated internally, the EASA MOC will establish an appropriate EASA certification team using EASA staff. The EASA MOC will nominate an audit team made up of a team leader / members to carry out the investigation process.

When not internally allocated the technical investigation can be allocated only to an NAA or a qualified entity duly accredited and having appropriate contractual arrangements with EASA.

In both cases internal or external allocation, the maintenance organisation is informed in writing about the allocated investigation team by the The EASA Department responsible for the administrative and financial matters.

The “contact point notification” communication sent by EASA specifies the contact details of the overseeing authority. For any technical issue related to the investigation the maintenance organisation shall contact the designated assigned inspector.

1.3 Audit team composition.

The number of auditors is normally limited to one however, the cases for which more than one auditor is to be used must be justified by the assigned inspector and agreed by EASA MOC prior to the investigation taking place.

The criteria applied by EASA to determine the investigation team are as follows:

- Complexity of the maintenance organisation approval;
- Number and location of sites to be audited;
- Size of the maintenance organisation;
- Nature of the services to be covered by the maintenance organisation and its direct impact to aviation safety;
- Appropriate technical experts;
- Any additional reason deemed necessary by EASA and justified by a specific situation reported by the assigned inspectors.

In certain circumstances, the CAO Section Manager may decide to adjust the number of staff by adding one EASA team member or by temporarily replacing one of the nominated team member by an EASA one.

If the accredited NAA / QE elects to use additional staff or trainees for an audit, EASA must be informed in advance. In such cases any associated cost will be borne directly by the NAA / QE and not by the maintenance organisation or EASA.

Trainee staff from EASA may participate in investigation teams at no direct cost to the maintenance organisation.

Note: For all cases where a maintenance organisation wishes to have a line station located within the territory of the EU the EASA MOC will process the application in accordance with 145.B.15. This may lead to additional inspector from the NAA in which the line station is located at the expenses of the maintenance organisation.





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1.4 Technical investigation.

1.4.1 Development /Review of the maintenance processes.

The maintenance organisation shall identify and analyse the maintenance processes intended to be included in the EASA Part-145 approval and ensure compliance of such processes with Part-145 regulation “as amended” and applicable EASA instructions which are available on the EASA web site.

1.4.2 Development of the maintenance exposition (i.e. MOE and Forms 4).

Based upon this analysis /review the maintenance organisation shall develop and provide the assigned inspector with the applicable foreign EASA Form 4s and a draft of the MOE (including associated list(s) and procedure(s) as applicable) using the relevant EASA instructions as reference material.

Moreover for an Organisation which is applying for an Ax (Aircraft Maintenance) rating and is using the privilege of EASA Part-145 Appendix IV, to use staff not qualified in accordance with Annex III (Part-66) the EASA Part-145 Appendix IV and ICAO Annex I check list FO.CAO.00030-XXX, shall be completed as per the associated instructions.

1.4.3 Review of the provided documents by the assigned inspector.

1.4.3.1 MOE:

The assigned inspector reviews the draft MOE (including associated list(s) and procedure(s) as applicable) to ensure full compliance with the applicable requirements and the relevant EASA instructions.

When the proposed exposition is not acceptable (i.e. procedures or required information not available, not compliant with EASA Part-145 requirements and EASA instructions) and therefore could not be reviewed within the allocated time, the assigned inspector is required to stop the review and to send the draft of the MOE back to the maintenance organisation. The maintenance organisation will have to re-draft the MOE in accordance with the relevant EASA instructions.

In any cases, the maintenance organisation is formally notified of the assigned inspector’s MOE comments.

If after several exchanges, should the maintenance organisation still fail to provide acceptable documents (MOE, Associated lists, procedures, ..), EASA will determine the most appropriate actions including termination of the application.

Approvals
in IFP

MOE review is managed with a Desktop audit. The audit report is generated and forwarded to the maintenance organisation by the inspector. In addition, the findings are also notified through the IFP using an electronic workflow.

1.4.3.2 EASA Form 4:

The assigned inspector verifies the compliance of each management personnel (EASA Form 4 post holders) with the applicable requirements by using the relevant instructions as reference material.

1.4.4 Internal audit report from the maintenance organisation’s quality system.

Once the draft of the MOE and the applicable EASA Forms 4 are confirmed as being acceptable by the assigned inspector, the maintenance organisation’s Quality department shall audit the maintenance organisation in full for compliance with the MOE and Part-145 regulation “as amended”. All relevant EASA instructions dealing with specific technical matters (i.e. certifying staff, line maintenance, composite repairs, etc.) as applicable to the specific maintenance organisation, shall be also used as reference.

A statement signed by the organisation’s Quality Assurance Manager shall be provided to the assigned inspector before the EASA audit takes place confirming that processes, facilities, documentation, tools, equipment, material, components and personnel subject to the application have been reviewed and audited showing compliance with all applicable EASA Part-145 and EASA Part-M requirements. This means that all findings raised during this internal audit must have been closed with appropriate corrective actions before issuing this statement.

The relevant internal audit report(s) including the associated corrective actions shall be provided by the maintenance organisation along with the QM statement to the assigned inspector.





1.4.5 Preparation of the EASA Audit.

After receipt of acceptable:

- draft of the MOE;
- EASA Form 4s;
- associated documents;
- EASA Part-145 Appendix IV and ICAO Annex I check list FO.CAO.00030-XXX (if applicable);
- Quality Assurance Manager statement;
- internal quality audit report.

the assigned inspector may initiate the on-site investigation in accordance with Section B of EASA Part-145, its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM) and relevant procedures.

The maintenance organisation shall provide any necessary administrative support in order to get on time the Visa (i.e. invitation, etc.), the hotel reservation, etc.

The assigned inspector will:

- Liaise with the maintenance organisation for scheduling the audit;
- Prepare and notify the maintenance organisation of the audit program.

Note: In case of modification to the initial application, the maintenance organisation shall notify EASA before the investigation takes place by sending a revised EASA Form 2.

1.4.6 EASA audit.

When the audit programme is confirmed by the assigned inspector, the maintenance organisation could at its own discretion decide to inform its National Authority for the purpose of inviting any representative to participate to the EASA audit as an Observer.

The Assigned inspector shall start the investigation audit with an opening meeting with the maintenance organisation's management and where possible with the Accountable Manager. The following points shall be considered when carrying out the meeting:

- Confirmation of the audit schedule including objectives and scope of the audit.
- Confirmation of the required interviews / availability of the people involved in the EASA Part-145 process.
- Explanation on the method used for reporting non conformities.
- Confirmation of the applicable regulation and standards.

The Accountable Manager and all EASA Form 4 post holders must be met and interviewed (as necessary) by the Assigned inspector during this initial investigation.

The audit team shall review the audit findings and evidence collected against the current/intended scope of approval, agree on level² and corrective action time scales and prepare the audit conclusions for presentation to the maintenance organisation.

A closing meeting, chaired by the audit Team Leader will be held to present the audit findings and the conclusions to the maintenance organisation's management in order to ensure that they are understood and accepted. The maintenance organisation will be given the opportunity to discuss any non-compliance and timeframes.

A draft audit report should be provided to the organisation by the audit Team leader at the closing meeting. In case this is not possible for any reason (i.e. due to time constrains, etc.), the audit Team Leader will in any case debrief clearly the maintenance organisation during the closing meeting on the number of findings, level, due date plus a description of each finding raised against the applicable requirement.

² For an initial audit the findings shall not be classified as Level 1 or 2 as the organisation is not approved yet.





The formal notification of the findings is sent by the assigned inspector to the maintenance organisation within a maximum of 15 calendar days from the end of the audit.

Approvals in
IFP

The audit report is generated and forwarded to the maintenance organisation by the inspector. In addition, the findings are also notified through the IFP using an electronic workflow. At any time, the system allows to verify if a workflow is under the responsibility of the inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

Should the initial investigation lead to significant and/or numerous discrepancies, this would show insufficient understanding / compliance of the maintenance organisation and a lack of effectiveness of the Q/A system. In that case the Agency may take the decision and inform the maintenance organisation accordingly:

- To terminate the application making the non-consumed fees eligible for reimbursement. Should the maintenance organisation wish to re-apply for an EASA Part-145 approval he will have to make a new application to EASA;
- To limit the requested scope of work;
- Not to accept the concerned post holders and/or nominated personnel as defined in EASA Part 145.A.30 (a) & (b).

For an initial audit the findings shall not be classified as Level 1 or 2 as the maintenance organisation is not approved. A maximum of three months is allowed to take corrective action for each finding raised during the initial audit. In case the organisation is unable to complete the corrective actions within the established three months, an extension request shall be submitted to the assigned inspector, which may be granted up to a maximum of another three months. Failure to comply within the timescale granted, could lead the Agency to terminate the application.

Findings made during the investigation process will be handled by the Assigned inspector in accordance with Section B of EASA Part-145 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

When he/she is satisfied that the corrective actions proposed by the maintenance organisation have been adequately implemented, he/she shall recommend the issue of the approval to EASA.

Depending on the extent and nature of the findings and the delay of corrective actions implementation, an additional audit may be necessary.

The Assigned inspector is required to inform EASA about any inconsistencies with the number of staff required to meet the manpower requirements of the approval scope and rating as detailed in EASA Part-145.A.30 and the manpower aspects of EASA Part 145.A.30 (d) and as detailed in the MOE.

1.4.7 Recommendation.

Once the maintenance organisation's compliance with EASA Part-145 has been established and all findings are closed, the Assigned inspector will make a recommendation to EASA to issue the EASA Part-145 approval to the maintenance organisation. This includes the recommendation for MOE, associated documents approval and management personnel acceptance.

Note: In the case it appears necessary to adjust the requested scope of approval, then an EASA Form 2 shall be re-issued reflecting the scope of approval to be recommended.





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1.4.8 Issuance of an approval.

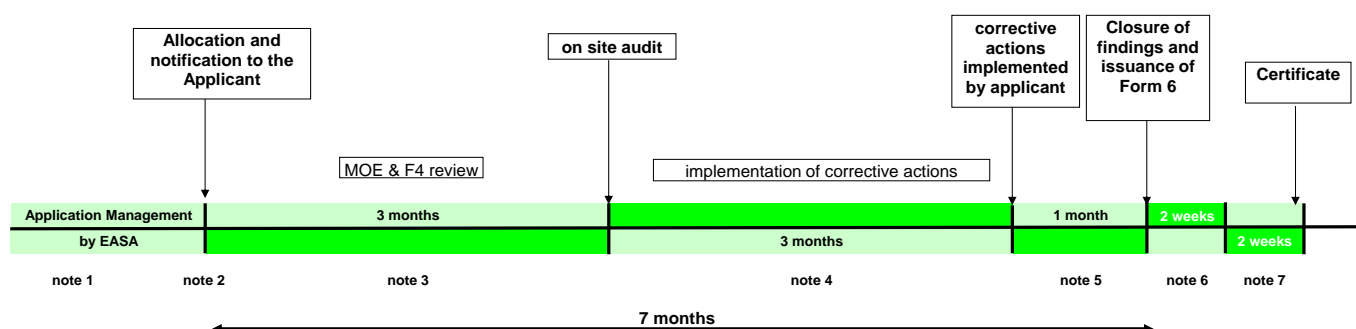
The recommendation package received from the assigned inspector is reviewed by the EASA for compliance and accuracy. Once satisfied EASA will prepare for signature by an EASA authorised person, as applicable:

- the certificate EASA Form 3;
- the approval letter of the MOE, together with its associated document(s) and list(s);
- the nominated personnel EASA Form 4s acceptance letters.

EASA will send the formal approval of all documents related to the EASA Part-145 approval such as EASA Form 3 Certificate, accepted EASA Form 4s, MOE, associated procedures and lists letter to the maintenance organisation with a copy to the Accredited NAA/QE that performed the oversight on behalf of EASA.

1.5 Time frame

The EASA Department responsible for the administrative and financial matters will establish the first annual surveillance fee invoice. The first annual invoice is due immediately after the issuance of the certificate. The normal time frame to process an EASA Part-145 approval is about 8 months from the allocation date; however the amount of time taken is largely dependent on the ability of the maintenance organisation to produce the documentation required and to rectify any non-conformity that may be identified during the certification process. Unless duly justified failure to meet this time frame might lead the Agency to terminate the application.



- note 1: the MOE guidance is made available to the applicant
- note 2: Allocation
The applicant is informed by EASA regarding the contact detail regarding to whom MOE and Form 4 must be sent.
- note 3: MOE draft review by the team leader and correction by the applicant up to an acceptable level
- note 4: Implementation of corrective actions and notification to the inspector by the applicant.
- note 5: The inspector to close the findings and issue the Recommendation package
- note 6: Form 6 and TV quality check: 2 weeks NAA to review recommendation package and forward to EASA
- note 7: 2 weeks EASA to process the recommendation package and issue the certificate F3.





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2 Change.





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2.1 Application.

This chapter applies only once the approval is granted. All changes as detailed in the EASA Part 145.A.85 and those related to administrative amendments (such as contact details, number of staff) require an EASA Form 2. An application for change of a maintenance organisation shall be made in accordance with Section A of EASA Part-145 by using the EASA Form 2 and its associated filling instruction, both available on EASA Web site: <http://easa.europa.eu> - Continuing Airworthiness Organisations page.

This Application form shall be sent directly by e-mail to EASA via the 'foreign 145' email box (foreign145@easa.europa.eu), by surface mail, fax or online through EASA website.

In order to keep the administrative workload at a reasonable level and to minimize the possible associated costs, the approval holders are recommended to combine change requests as much as possible instead of submitting several requests in the same short period of time (e.g. several applications within one month).

The EASA Department responsible for the administrative and financial matters will check the application. When incorrect or incomplete information is supplied, The EASA Department responsible for the administrative and financial matters shall notify the maintenance organisation as soon as possible by email detailing the omissions and errors. In case of refusal of an application, EASA Applicant Services Department will notify this decision in writing to the maintenance organisation together with the reasons thereto.

The communication process is done according the EASA "General Conditions and Terms of Payment" document, and it is the same as indicated in the initial application process (chapter 1.1 "application" of this user guide).

Once the application package is complete, the EASA CAO section checks the eligibility of the application according to EASA Part-145 regulation. This application for change must include:

- The Foreign EASA Form 2;
- In case of name change, a Certificate of Incorporation (certificate of trade registration) as detailed on the EASA Form 2 with a translation in English.

When eligibility has been fully assessed, EASA will inform the NAA / QE MOC or the EASA assigned inspector that the application can be processed.

In parallel, the maintenance organisation is invited to send to the assigned inspector all documents related to the change (MOE, associated lists, procedures, EASA Form 4s, internal audit report,...).

Any impact of the change with fees will be processed by the EASA Department responsible for the administrative and financial matters.

2.2 Allocation of the investigation team.

By default the investigation is performed by the assigned initial team. However, should it become necessary or more appropriate to allocate a different auditor, the CAOM makes the decision to allocate another inspector, he/she will inform the EASA Department responsible for the administrative and financial matters who will inform the selected authority and the maintenance organisation in writing.

2.3 Audit team composition.

The audit team composition shall be established in accordance the criteria defined in the chapter "audit team composition" of this user guide.

Upon specific circumstances, the CAO Section Manager may decide to modify the number of staff by adding one EASA team member or by temporarily replacing one of the nominated team members by an EASA team member.





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Note: For all cases where an organisation wishes to have a line station located within the territory of the EU the EASA MOC will process the application in accordance with 145.B.15. This may lead to additional inspector from NAA in which the line station is located at the expenses of the maintenance organisation.





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2.4 Technical investigation.

The technical investigation process for a change of approval as listed in 145.A.85 is identical to the initial process described in the chapter "technical investigation for initial approval" of this user guide. However the followings peculiar points shall be considered:

- The internal quality audit shall cover at least all areas impacted by the requested change(s);
- Changes cannot be implemented prior to EASA formal approval. However, the Assigned inspector shall liaise with the EASA MOC of all cases where the maintenance organisation wishes to operate in accordance with 145.B.35 (2);
- Should the investigation for change lead to significant and/or numerous discrepancies, this would show insufficient understanding /compliance of the maintenance organisation and a lack of effectiveness of the Q/A system. In that case the overseeing authority will liaise with the EASA MOC in order for the Agency to terminate the application for change and to raise a finding against the Q/A system. In that case the requested change cannot be approved and moreover such a lack of effective implementation of Q/A system could lead the Agency to limit or suspend the current approval;
- All findings that have an impact on the requested change must be listed and closed prior to the assigned inspector making the recommendation for the approval of the change to EASA; the other findings, not directly related to the change, will be managed as part of the on-going regular surveillance.
- Changes of management personnel may not necessarily require an on-site audit and can be managed in accordance with the EASA Form 4 instructions.

For a change audit the findings related to the change shall not be classified as Level 1 or 2 as the organisation is not approved. A maximum of three months is allowed to take corrective action for each finding raised during the change audit. In case the organisation is unable to complete the corrective actions within the established three months, an extension request shall be submitted to the assigned inspector, which may be granted up to a maximum of another three months.

Failure to comply within the timescale granted, could lead the Agency to terminate the application.

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The audit report is generated and forwarded to the maintenance organisation by the inspector. In addition, the findings are also notified through the IFP using an electronic workflow. At any time, the system allows to verify if a workflow is under the responsibility of the inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

2.5 Time frame.

The time frame related to the approval of a change is highly variable depending on the nature of the change. The time frame provided for the process of initial approval may be considered as the upper limit.





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3 Continued surveillance.





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3.1 Continued surveillance principles.

3.1.1 Frequency of visits and number of auditors.

As per EASA Part 145.A.90 the approval shall be issued for an unlimited duration. However, each maintenance organisation is audited as a minimum once a year and the approval is to be continued every 24 months. This means the assigned inspector must perform at least 2 routine audits during this 2-year period also called Surveillance Cycle: one audit in the first year and a second audit in the second year.

The period to be considered starts from the date the initial certificate was granted or from the last continuation date. Possible changes of the certificate do not modify the continuation date of an approval.

However the number of intermediate audits as well as the number of auditors may be adapted by the EASA MOC depending on the following criteria:

- Complexity of the maintenance organisation approval;
- Number and location of sites to be audited;
- Type of audit (initial, changes, follow up audits, findings etc.);
- Size of the maintenance organisation;
- Nature of the services to be covered by the maintenance organisation and its direct impact to aviation safety;
- Appropriate technical experts.

It should be noted that an audit for change does not replace an intermediate audit but both may be combined to limit the travel costs for the maintenance organisation.

Moreover EASA may require additional audit(s) for the following reasons:

- the maintenance organisation has shown weaknesses when formerly dealing with serious and / or numerous findings;
- the maintenance organisation has shown difficulties to close former findings within the expected time frame;
- the maintenance organisation is facing frequent changes of his management personnel which could jeopardize the maintenance organisation stability;
- EASA is informed about incident or events that may affect the safety.

3.1.2 Allocation of the investigation team.

By default the continued surveillance of an approval is performed by the team assigned during the initial investigation or the previous surveillance cycle.

Where deemed necessary, the CAO Section Manager may also reallocate the surveillance to another authority or modify the audit team composition by adding one EASA inspector or temporarily replacing one member by an EASA one. In any case the EASA Department responsible for the administrative and financial matters will inform the maintenance organisation together with the selected authority in writing about any change of overseeing authority.





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3.2 *Technical investigation.*

3.2.1 *Audit report*

The technical investigation process for a continued surveillance is identical to the initial process described in the chapter “technical investigation for initial approval” of this user guide. However the followings peculiar points shall be considered:

- all findings shall be classified with a level in accordance with EASA Part-145.B.50;
- in case a level 1 finding is identified no any audit draft will be provided to the maintenance organisation.

The process to manage the level 1 and level 2 findings is described in the following paragraphs.

After each audit, the assigned inspector will provide the maintenance organisation with an audit report provided no Level 1 finding is suspected.

The formal notification of the findings must be sent to the maintenance organisation within a maximum of 15 calendar days from the end of the audit.

Note: Should the intermediate audit lead to NIL finding, a formal notification is however to be sent to the maintenance organisation.

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The audit report is generated by the system and the findings notified with an electronic workflow to the maintenance organisation. At any time, the system allows to verify if a workflow is under the responsibility of the inspector (e.g. findings to be still notified) or if it is under the responsibility of the organisation (e.g. finding corrective action in progress).

3.2.2 *Level 1 finding.*

In the particular case of Level 1 finding, the assigned inspector shall not transmit any audit report to the maintenance organisation. The assigned inspector shall liaise with EASA to confirm the Level 1 finding.

When the level 1 finding is confirmed, EASA will formally notify the maintenance organisation with the finding(s) using the EASA Form 6 / Part 4 together with the decision against the approval.

It is the responsibility of the maintenance organisation to take the appropriate and immediate corrective action as specified in the chapter “Limitation, Suspension and revocation” of this User guide.

3.2.3 *Level 2 finding.*

Level 2 findings are notified to the maintenance organisation directly by the assigned inspector.

The corrective action period granted by the assigned inspector depends on the nature and the gravity of the finding. In any case the initial due date cannot be more than three months.

The maintenance organisation shall provide the assigned inspector:

- within 15 days after the receipt of the finding notification or within the finding due date, whichever is the earlier date: an acknowledgement of the findings, a high level action plan and confirmation that a root cause analysis has been started together with the associated proposed timescales.
- Corrective action evidences as per the agreed corrective action plan and in any case in advance of the finding due date to allow the review by the assigned inspector within the finding due date.





Findings made during the surveillance cycle will be handled by the assigned inspector in accordance Section B of EASA Part-145 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

Should the maintenance organisation need an extension of the initial due date agreed for a finding, such an extension cannot exceed three additional months and shall be justified and requested in writing to the assigned inspector. Such a justification shall consist in a corrective action plan detailing the corrective action(s) with the associated time frame and the intermediate actions as necessary. The assigned inspector shall notify his/her decision to the maintenance organisation. Such an extension is not systematically granted (AMC 145.B.50 (b)).

According to EASA Part 145.B.50 (b), when the maintenance organisation cannot meet the timescales specified for Level 2 findings and no request for an extension has been made, EASA can decide to suspend in whole or part the approval.

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All the actions related to findings management (including root cause analysis and corrective action report) are carried out directly in the IT tool by the maintenance organisation

3.2.4 Corrective action.

To be acceptable a proposed corrective action shall address at least the following issues for each finding:

- The results of the root cause(s) analysis cause(s);
- Corrective action based upon the identified root cause(s) which shall detail:
 - Immediate or short term corrective action;
 - Long term corrective action preventing reoccurrence of such non- conformity.

The implementation of the whole corrective action shall not exceed the time frame imposed by EASA to close the finding. This implies that the assigned inspector has received the agreed corrective actions and the relevant evidence³ with enough anticipation to review them as necessary and to formally close the related findings at the due date (e.g.: 21 days in advance for a finding due date set up at 3 months).

Note: A voluntary reduction of the scope of approval cannot be systematically considered as an appropriate corrective action to a finding.

3.2.5 Closure.

When the Assigned inspector is satisfied with the corrective actions that have been proposed by the maintenance organisation in respect of level 2 finding(s) raised during the audit, he/she notifies in writing the maintenance organisation that the proposed corrective actions are considered to be acceptable.

However, the acceptance of a corrective action may require an on-site audit by the assigned inspector prior to formal closure of the related finding.

The closure of an audit report requires the closure of each finding included in that report.

The closure of an audit report which includes at least one level 1 finding shall be done according to the chapter re-instatement of this user guide.

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Findings closure is managed in the system and organisations receive automatic notification of closure

³ Promises, drafts, statements, wishes, hopes, plans, etc. cannot be accepted as evidence.





3.2.6 Occurrence Report

As part of the continued surveillance, the maintenance organisation may be requested by the assigned inspector to investigate occurrence reports. Such reports may have been received by EASA either from the maintenance organisation itself (according to the MOE 2.18 procedure to report occurrences to the competent authority) or from a third party (i.e. customer operator, manufacturer, etc.).

Such cases, where a further investigation is requested to the maintenance organisation, are limited to those occurrences which are pre-assessed by EASA as being related to an already established or potential responsibility of the specific maintenance organisation.

The maintenance organisation is required to provide an investigation report detailing the analysis of the event, conclusions and where applicable preventive and corrective actions to avoid reoccurrence.

The level of involvement of the assigned inspector in this process (desktop or on-site audit) may depend on the result of the investigation conducted by the maintenance organisation and the potential safety impact of the event occurred.

3.3 Continuation of approval.

At the end of each surveillance cycle, the approval needs to be continued according to 145.B.30 provision. The continuation of an approval is a process not requiring any application from the approval holder and it is entirely managed by the competent authority with the support of the assigned inspector. As a consequence, considering that the approval is valid for an unlimited duration under the provision of EASA Part 145.A.90, EASA is not issuing any formal continuation communication to the relevant maintenance organisation.

In order to process the continuation recommendation the assigned inspector will require the maintenance organisation to complete the EASA Part-145 Appendix IV and ICAO Annex I check list FO.CAO.00030-XXX. This will be generally requested at the "continuation" audit.

3.4 Shared audit

Taking into consideration that the oversight of the Foreign AMOs is carried out by different entities being EASA/NAAs/QE inspectors, the need exist for EASA as the competent authority to have a system in place which enables verification of areas which cannot be observed on a desktop basis during the review of the recommendation reports. This system is identified with the shared audit exercise.

The Shared Audit is defined as an on-site audit carried out by an EASA designated inspector together with the EASA/NAAs/QE assigned Team Leader who is in charge for the oversight of the AMO.

3.4.1 Recommendation for continuation.

Every 24 months the assigned inspector will have to summarize the surveillance performed and if satisfied, will recommend EASA to continue the approval (continuation of the approval). For that purpose he/she will prepare a recommendation EASA Form 6 and a surveillance plan for the new period. The surveillance plan may be sent by the assigned inspector to the maintenance organisation upon request.

At the time of the continuation recommendation, recent level 2 findings having not reached yet the deadline may be still open. In this case the approval holder must provide the assigned inspector with an acceptable corrective action plan for those findings that are still open.

The formal corrective action plan submitted by the Accountable Manager or the Quality Manager must be formally accepted by the Assigned inspector.





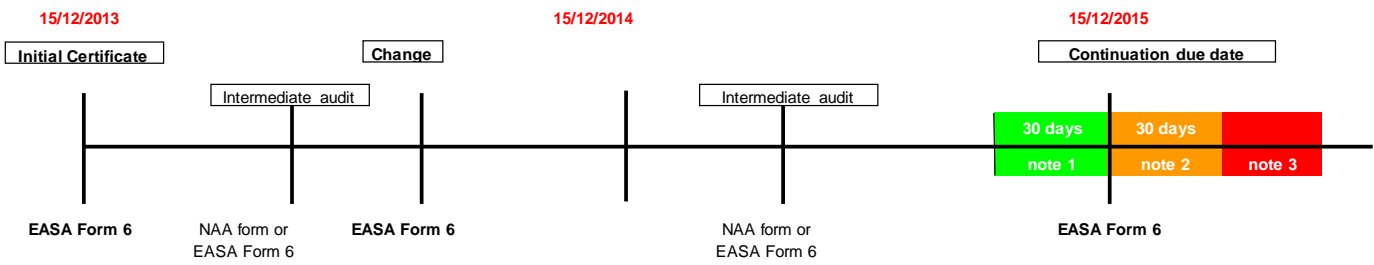
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Findings made during the surveillance cycle will be handled by the Assigned inspector in accordance with Section B of EASA Part-145 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

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In the system, the surveillance plan is replaced by a phase planning concept. When the previous phase is closed a new one is created.

3.4.2 Time frame.



- note 1 : the recommendation EASA Form 6 should not be dated more than 30 days BEFORE the due date.
- note 2 : the recommendation EASA Form 6 should not be dated more than 30 days AFTER the due date.
- note 3: in case of "force majeure", a documented extension request is to be sent to EASA





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4 Surrender of an approval.





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4.1 Notification to EASA.

If the maintenance organisation intends to surrender the EASA Part-145 approval, the EASA Form 2 shall be submitted to EASA and completed as per EASA Form 2 filling instruction for surrender.

4.2 EASA confirmation.

Based upon the EASA Form 2, EASA will formally notify the maintenance approval holder about the surrender of its maintenance approval.

At the same time, EASA Financial department will process any outstanding payment /recovery according the current fees and charges Regulation. In addition, any fee not consumed will be reimbursed.

4.3 Maintenance organisation obligations.

According to EASA Part 145.A.55 (c).3 where an organisation approved under EASA Part 145 terminates its operation, all retained maintenance records covering the last three years shall be distributed to the last owner or customer of the respective aircraft or component.

In addition, according to 145.A.90(b), the approval shall be returned to EASA.





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5 Limitation, Suspension and Revocation of an approval.





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5.1 *Legal basis.*

The EASA is the competent authority for Foreign EASA Part-145 approvals and as such shall:

- Suspend an approval on reasonable grounds in the case of potential safety threat;
- Revoke, limit or suspend the EASA Part-145 Approval in whole or in part, depending upon the extent of the significant non-compliance (level 1 finding⁴), until successful corrective action has been taken by the maintenance organisation;
- Suspend in whole or in part the approval in case of failure to comply within the timescale granted by the competent authority.

A limitation of an approval means that the competent authority imposes restrictions to the privileges held by the maintenance organisation without impact on to the certificate.

A suspension of an approval means that the competent authority removes partially or in whole the ratings endorsed on the certificate and the MOE.

Revocation means that the approval granted to the maintenance organisation is removed in whole and definitively.

5.2 *Notification of EASA decision.*

Based upon a recommendation to limit, suspend or revoke the approval of an organisation, the EASA Head of Maintenance and Production Department in coordination with the EASA CAO Manager and the EASA MOC will make a decision in relation to the approval and formally notify the maintenance approval holder about:

- The EASA decision to the limit, suspend or revoke the EASA maintenance organisation approval;
- The audit report (EASA Form 6 Part 4) showing the confirmed level 1 and the possible level 2 finding(s);
- A time frame for the maintenance organisation to provide EASA with:
 - An acceptable corrective action plan (CAP) for the level 2 findings⁵ referenced in the audit report (EASA Form 6 Part 4);
 - Evidence that additional measure(s) required by EASA have been taken by the maintenance approval holder;

⁴ A level 1 finding is any significant non-compliance with EASA Part-145 requirements which lowers the safety standard and hazards seriously the flight safety.

⁵ A level 2 finding is any non-compliance with the EASA Part-145 requirements which could lower the safety standard and possibly hazard the flight safety.





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5.3 Organisation action and response.

The maintenance organisation is expected to:

- acknowledge receipt of the letter by return of mail, confirming that the maintenance organisation has put in place the restrictions required by EASA;
- take immediate corrective action to the level 1 finding(s) based upon the results of the root cause analysis and informed EASA accordingly;
- identify the EASA Part-145 maintenance release certificates signed that are relevant to the significant non-compliance (aircraft / engine / part / component);
- to ensure - when necessary - that additional maintenance or re-certification of all affected products is accomplished;
- to inform the relevant customer and the associated competent authority – when necessary- about the significant non-compliance and the results of the associated non-compliance investigation;
- to provide the EASA with an acceptable corrective action plan (CAP) for the level 2 findings referenced in the audit report (EASA Form 6 Part 4) within the defined time frame. This CAP can include the long term corrective action related to the level 1 finding(s).

Where the maintenance organisation fails to comply with any of the above mentioned requirements, EASA could revoke the EASA maintenance organisation approval.

In case of revocation of an approval, the organisation shall immediately send the original certificate back to EASA.

Note: During the suspension phase the assigned inspector remains the contact point for the maintenance organisation and all exchanges must be addressed to him/her. The EASA MOC shall be copied with any messages related to the points addressed above.





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6 Approval Re-instatement.





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This chapter applies to suspended or limited approvals and not to revoked ones.

The maintenance approval holder must take action as mentioned in the in chapter “organisation action and response” of this user guide. When the corrective action plan is acceptable to EASA the organisation must start the implementation of the proposed immediate and long term corrective actions to the findings.

- Once the implementation process (including those related to the level 1 finding) is fully completed, the maintenance organisation’s Quality department shall audit the organisation in full for compliance with Part-145 regulation “as amended”. Before the re-instatement audit takes place, a statement signed by the maintenance organisation Quality Assurance Manager shall always be provided, confirming the effective implementation of the proposed corrective actions. The relevant audit report shall be provided by the maintenance organisation to the assigned inspector.
- Once the inspector is satisfied with the actions that have been taken by the maintenance organisation in respect to each finding raised and once he/she has received the statement signed by the organisation Quality Assurance Manager he/she liaises with the maintenance organisation and the EASA MOC for scheduling the audit.
- In addition to the assigned initial team, the CAO section Manager may select an EASA representative who will take part in the re-instatement audit (combined audit).
- Once compliance of the maintenance organisation with EASA Part-145 has been established during the on-site audit, the Assigned inspector will recommend to EASA the EASA maintenance organisation approval re-instatement. This might include the recommendation for the approval of a MOE revision.
- Based upon this recommendation for re-instatement, the EASA will formally notify the re-instatement to the maintenance organisation.

Note: During the suspension phase and at the time of the re-instatement audit the EASA will not accept any application for change related to the extension of the scope of approval. However, other changes including reduction of the scope could be considered.

