

**International Maintenance Review Board Policy Board (IMRBPB)**  
**Issue Paper (IP)**

**Initial Date (15/Feb/2018):**

**IP Number: CIP EASA-2018-03**

**Revision / Date (DD/MM/YYYY):**

**Title: Implementation of “Retroactive” IMRBPB Issue Papers**

**Submitter: EASA**

Applies To:	
MSG-3 Vol 1	
MSG-3 Vol 2	
IMPS	X

**Issue:** Some “Retroactive” IPs are not implemented by all TCHs, due to contradiction between recommendation for implementation (Retroactive: YES) and the content of the “Important Note” in the CIP template.

**Problem:**

Some IPs have been classified as “Retroactive” however they haven’t been implemented due to the “Important Note” stating “The IMRBPB positions are not policy. Positions become policy only when the policy is issued formally by the appropriate National Aviation Authority applies”.

**Example:**

**IP 160** *Revision / Date: Rev 00/29/APR/2016*

**Title:** MRBR Periodic Review

The IMRBPB accepted this IP with the following recommendation for implementation:

**Retroactive: Y, existing PPH should define the annual review process**

Therefore the expectation was to have the MRBR Periodic Review into all PPHs (including the legacy ones).

However Regulators are not enforcing in the same way the retroactive concept.

Some Regulators consider that ALL Issue Papers (including “Retroactive” IP) only become policy when the IP is adopted into the processes of the appropriate National Aviation Authority.

This goes against the Regulators’ effort to standardize the development of scheduled maintenance requirements and creates unfairness in the industry.

**Recommendation (including Implementation):**

EASA recommends:

- 1 - To remove the current Important Note from the CIP template
- 2 - To include a dedicated paragraph 3.14 (new paragraph based on the IP 174) in the IMPS in order to harmonize the implementation of “Retroactive” IPs

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Proposed paragraph 3.14:

*When IMRBPB Issue Papers are agreed to and classified as “Retroactive”, they shall be considered as policy therefore implemented by the TCH in its PPH at the next opportunity, at the latest within the periodic review timeframe from the date of the acceptance of the IMRBPB.*

**IMRBPB Position:**

**Date:**

**Position:**

**Date:**

**Position:**

**Status of Issue Paper and date:**

Active

Incorporated in MSG-3 / IMPS (with details)

Archived

**Recommendation for implementation:**

**Retroactive: YES**

**Important Note:** The IMRBPB IPs are not policy. An IP only becomes policy when the IP is adopted into the processes of the appropriate National Aviation Authority. However, before formal adoption, the IP content may be incorporated by the MRB applicant on a voluntary basis with the agreement of all parties as detailed in the program PPH.