



# EASA

European Aviation Safety Agency

## **NPA 2015/17: Proposed amendments (Part 1 of 3): Recommendations and Controlled Environment**

*Juan Anton  
Maintenance Regulations Manager  
Flight Standards Directorate  
EASA*

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# **New structure of the Regulation (in relation to airworthiness reviews)**



# New structure of the Regulation

- All requirements related to airworthiness reviews (except privileges of organisations) are now contained in Subpart I.
- The content of M.A.707 “Airworthiness Review Staff” and M.A.710 “Airworthiness Review” within Subpart G has been transferred to Subpart I.

## **New structure of Part-M**

### **Section A, Subpart I:**

- M.A.901 Aircraft airworthiness review – General
- M.A.902 Validity of ARC
- M.A.903 Airworthiness review process
- M.A.904 Airworthiness review staff
- M.A.905 Transfer of aircraft registration within the EU
- M.A.906 Airworthiness review of aircraft imported into the EU
- M.A.907 Findings



# New structure of the Regulation

## **Section B, Subpart I (For NAAs)**

- M.B.901 Airworthiness review by the competent authority
- M.B.902 Assessment of airworthiness review staff
- M.B.903 Assessment of recommendations
- M.B.904 Transfer of aircraft registration within the EU
- M.B.905 Import of aircraft into the EU
- M.B.906 Findings
- M.B.907 Record keeping



# **Changes introduced to the privileges of approved organisations**



# Changes to privileges of approved organisations

## Subpart F maintenance organisations (M.A.615)

- Some cross-references to paragraphs of Subpart I amended.

## CAMOs (M.A.711 and M.A.712)

- The number of cases where small CAMOs can use organisational reviews (instead of Quality System) has been restricted:
  - **Before:** CAMO is not managing CAT aircraft and not issuing ARCs **for aircraft above 2730Kg (other than balloons)**
  - **Now:** CAMO is not managing CAT aircraft and not issuing ARCs **for aircraft above ELA2.**
- Some cross-references to paragraphs of Subpart I amended.
- Simplification of wording.



# **M.A.901 Airworthiness review - General**



## M.A.901 Airworthiness review - General

- A periodic airworthiness review is needed to ensure the validity of the aircraft airworthiness certificate (CofA or Restricted CofA per **GM M.A.901**).
- A satisfactory Airworthiness Review will result in:
  - An ARC issued following Appendix III, or
  - A recommendation to the NAA when importing an aircraft from outside the EU (the NAA will issue the ARC). **THIS IS THE ONLY CASE WHERE THERE ARE RECOMMENDATIONS.**
- The Airworthiness Review can be performed by:
  - CAMOs holding the appropriate privilege.
  - Maintenance Organisations (Subpart F or Part-145) together with the annual inspection (only for ELA1 non-commercial aircraft)
  - Independent certifying staff accepted by NAA of the State of Registry (refer to M.A.904(g)) (only for ELA1 non-commercial aircraft). **NOW THEY CAN ALSO ISSUE THE ARC (no recommendations).**





## M.A.901 Airworthiness review - General

- The ARC or the recommendation shall be signed by the staff who performed the airworthiness review.
- The NAA **shall** perform the Airworthiness Review:
  - When the aircraft is managed by a non-EU CAMO.
  - When the owner requests it for ELA2 aircraft. **BEFORE, IT WAS FOR AIRCRAFT BELOW 2730Kg AND BALLOONS (IF AGREED BY THE NAA)**
  - When circumstances reveal the existence of a potential safety threat (see M.B.901(b)1)
- The Airworthiness Review may be anticipated up to 90 days without loss of continuity of expiration pattern (see **GM M.A.901**)
- The Airworthiness Review shall not be subcontracted.
- The ARC shall not be issued if evidence or reason to believe that the aircraft is not airworthy.
- A copy of the ARC (issued or extended) sent to the Member State of Registry within 10 days.



# M.A.901 Airworthiness review - General

## **AMC M.A.901(b)**

- The Airworthiness Review should be documented in a **compliance report**, containing:
  - General information
  - Aircraft information (identification)
  - Aircraft status
  - Details of the documented review
  - Details of the aircraft survey
  - Findings
  - Details of the airworthiness review staff and, if applicable, airworthiness review support staff and certifying staff who assisted during the airworthiness review.



## M.A.901 Airworthiness review - General

### **AMC M.A.901(b) (continuation)**

- The recommendation sent to the NAA (for import of aircraft from outside the EU) should contain:
  - All the items contained in the **compliance report**, except that the details of the documented review can be replaced by a summary (unless the NAA asks for it to assess the recommendation).
  - An statement signed by the airworthiness review staff, confirming that the aircraft complies with:
    - All ADs
    - The TCDS
    - The AMP
    - Component service life limitations.
    - The valid weight and centre of gravity schedule.
    - Part-21 for all modifications and repairs.
    - The current Flight Manual and supplements.
    - The applicable operational requirements.
- The recommendation should be at least in English if the State of Registry is different from the organisations's Member State



# M.A.901 Airworthiness review - General

## **AMC M.A.901(c)**

- If the aircraft is managed by a CAMO, this should be the organisation performing the airworthiness review (if it has the corresponding privileges). In certain circumstances (heavy workload, General Aviation...) another organisation may be contracted.



# **M.A.902 Validity of the ARC**



## M.A.902 Validity of the ARC

- The ARC is valid for 1 year.
- The ARC can be extended for 1 year (maximum 2 consecutive extensions), by the CAMO (nominated staff) managing the aircraft if:
  - The aircraft has been managed by a CAMO (**or several CAMOs**) since the last issue or extension of the ARC.
  - **The CAMO (the one extending the ARC) has notified the NAA of the State of Registry that they are in full control of the continuing airworthiness of the aircraft (the aircraft can be considered as being in a controlled environment).**
  - The aircraft has been maintained by approved maintenance organisations (other than for Pilot-owner maintenance tasks, which may be performed by the Pilot-owner or by independent certifying staff, in which case the CAMO needs to be informed).
  - There is no evidence or reason to believe that the aircraft is not airworthy.



## M.A.902 Validity of the ARC

- The ARC becomes invalid if:
  - The ARC is suspended or revoked, or
  - The aircraft (or any component) does not meet the requirements of Part-M, or
  - The airworthiness certificate is suspended or revoked.
- An aircraft must not fly if the airworthiness certificate is invalid.



# M.A.902 Validity of the ARC

## **AMC M.A.902(a)**

- The extension may be anticipated by a maximum of 30 days without a loss of continuity of the airworthiness review pattern.

## **GM M.A.902(a)**

- The extension may be anticipated by a maximum of 30 days without a loss of continuity of the airworthiness review pattern (in order to allow the owner/operator to have the aircraft available and place the original on-board). Otherwise:
  - If performed more than 30 days before, the new due date will be 1 year from the date of the extension.
  - If performed after the expiration, the new due date will be 1 year from the original due date (and the aircraft cannot fly from the expiration until the extension is performed).
- It is not allowed to issue a new ARC in case of extension.
- If the airworthiness review is anticipated more than 90 days, the new due date will be 1 year from the date of issue of the ARC.





# **ARC: Form 15**



## ARC: Form 15

- Forms 15a, 15b and 15c have been merged as Form 15a/b Issue 1 (will certainly change with the introduction of Part-ML “Light Part-M”)
- It can be signed by:
  - NAA
  - CAMO
  - Maintenance Organisations (Subpart F or Part-145)
  - Independent certifying staff
- It contains the fields for the 2 extensions (can be performed by CAMOs independently of who issued the ARC, if the conditions in M.A.902(b) are met).
- The Flight Hours have been removed.
- In the extensions (but not in the airworthiness review) it has been removed the statement that the aircraft is considered “airworthy”.