



EUROPEAN AVIATION SAFETY AGENCY
AGENCE EUROPÉENNE DE LA SÉCURITÉ AÉRIENNE
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M.014 Working Group and Review Group history and outputs

Presented by Phil Hall – Member of the
M.014 Working Group and Chairman of the
Review Group

28th June 2012 Cologne

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- Working Group established in July 2006
 - Requested to review the experience and practice with sub-contracting of CAW tasks
 - Consider whether some contracting of CAW tasks to an approved organisation was feasible
 - Review the risks and mitigations that would arise from this concept
 - Develop an opinion or amendment to current regulation



M.014 Working Group & Review Group

- M.014 Working Group composition:-

- 11 members – 2 EASA

- 3 NAA's

- 5 industry

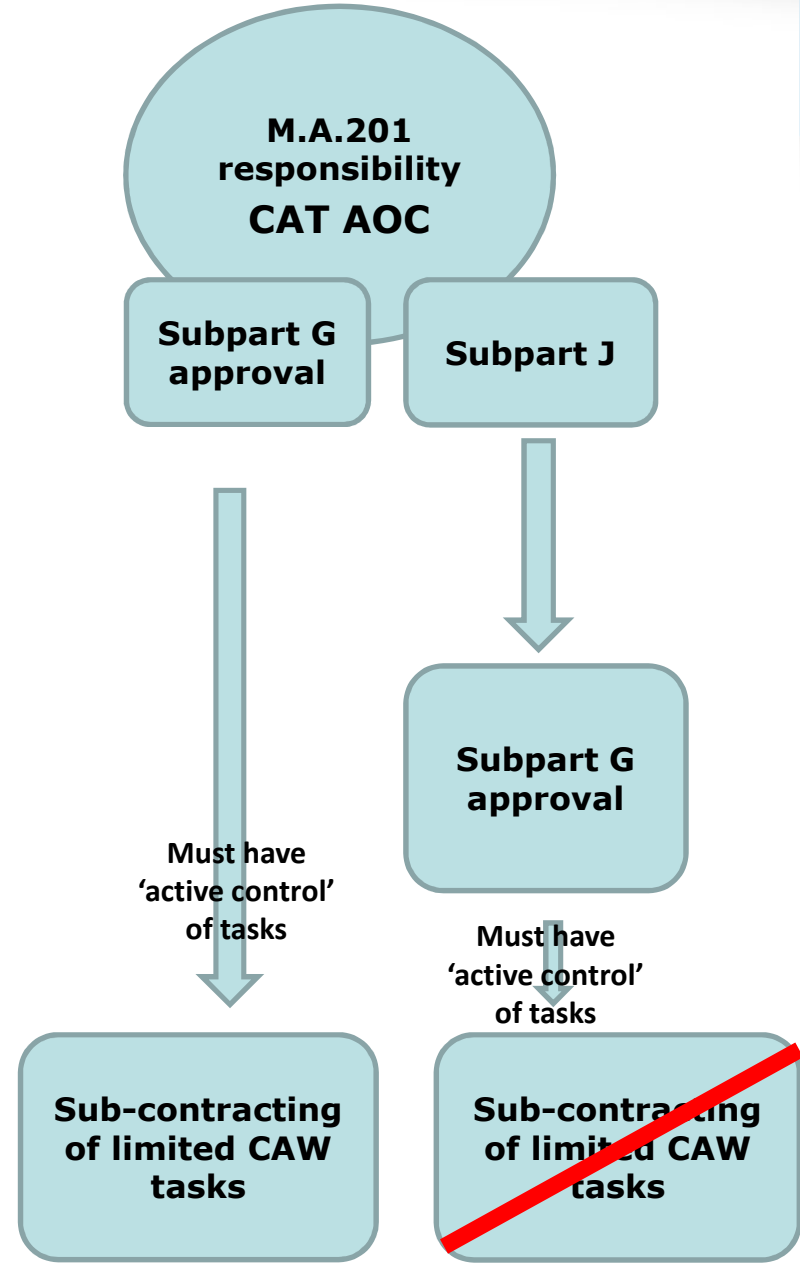
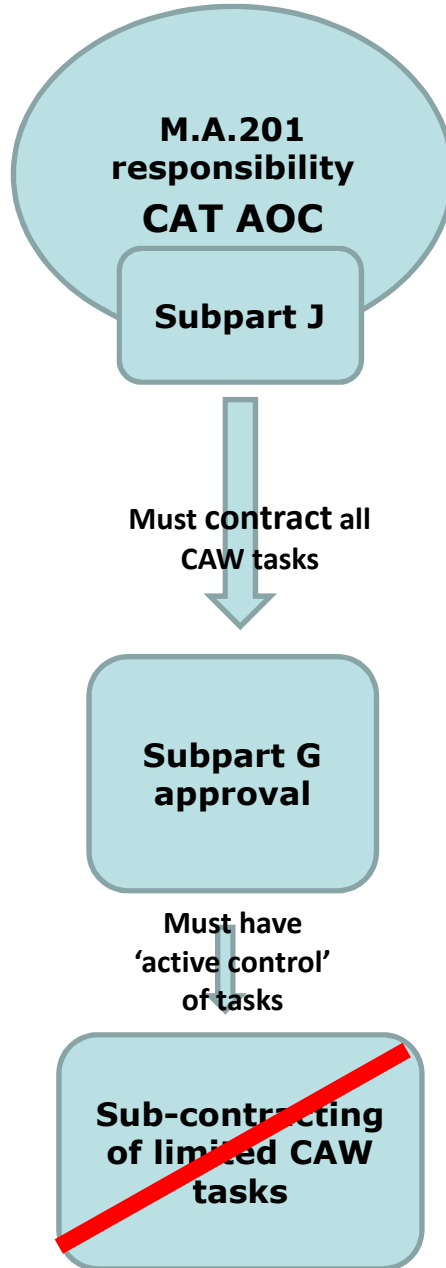
- Cross section: type certificate holder
lessor

- operator/CAMO service
providers

Eleven 2-day meetings held between July 2006 and January 2008 plus two sub group meetings



- Key concerns were reviewed for example:
 - How the Operator's responsibility under M.A.201(h)1 could be fulfilled
 - Review of terminology used
 - Matrix of risks produced with possible mitigations





M.014 Working Group & Review Group

- Following closure of the comment response period for NPA 2010-09 the Review Group was established and three 2-day meetings were held in March, April and June 2011
- The Review Group comprised 6 members of the M.014 Working Group and 7 new members
- 5 from industry and 8 NAA/EASA
- Review Group tasked with reaching a consensus on the proposal



200 comments were received and the nature of the comments received during the workshop in 2010 show:

- Significant objections to the entire NPA by several NAA's
- Support from the industry

Further analysis shows:

- Some NAAs have not commented at all, or in such a way that the reasons for their objections are not completely clear;
- Most of the commenters appeared not to have fully read or understood the proposal



1. M.014 Working Group & Review Group

The Review Group reached general consensus that contracting of continuing airworthiness tasks is a viable concept

- Confirmation that it does not breach ICAO SARPs
- Mitigating factors have been proposed which include:
 - Simplification of text to remove the complexity
 - Restriction of second tier sub-contracting
 - Allays concerns over NAA oversight;
 - Co-operation and communication between NAA's could be improved
 - Agreement to improve the text regarding responsibilities
 - Removing the introduction of some SMS principles (will be left to MDM.055)



- ▶ Key recommendation to EASA management to run a forum where the case could be re-stated as the Review Group felt the NPA proposals were largely misunderstood

