

Lorenzo Pellegrini  
Maintenance Organisation Oversight Section Manager  
Flight Standards Directorate

**To all Foreign EASA Part-145  
Approval Holders**

Ares(2021)503265  
lpe/rta/FS1  
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**Subject: Upcoming introduction of SMS and clarification of means to comply with Hangar requirements for Aircraft Base Maintenance.**

Dear Sir, Madam,

The purpose of this letter is to inform the Foreign Part-145 organisations approved for Aircraft Base Maintenance that

- Opinion 04/2020, published on 21 December 2020, and
- Notice of Proposed Amendment 2019-05 (NPA 2019-05), published on 17 April 2019,

aiming to introduce Safety Management System principles (i.e. SMS) in accordance with the ICAO Annex 19, are bringing changes to Annex II (Part-145) to Regulation (EU) No 1321/2014 and to the associated AMC/GM.

It is foreseen that this future regulatory package introducing SMS will clarify the expectations with respect to facilities and how compliance with 145.A.25(a) and its related AMC/GM should be demonstrated by organisations approved for Base Maintenance. In principle, a hangar enclosing the full aircraft should be used for Base Maintenance, however, NPA 2019-05 introduces the following point:

***AMC1 145.A.25(a) Facility requirements [...] 5. Subject to a risk assessment and agreement by the competent authority, the organisation may use facilities at the approved location, **other than a hangar that encloses the whole aircraft, for certain aircraft base maintenance tasks**, provided that those facilities offer levels of weather and environmental protection that are equivalent to those of a hangar, as well as a suitable working environment for the particular work package. This does not exempt an organisation from the requirement to have an aircraft hangar in order to be approved to conduct base maintenance at a given location.***

This clarifies that for Aircraft Base Maintenance which requires extensive disassembly, inspection, repair, etc., proper facilities are those that enclose the whole aircraft. Closed facilities are indeed the only means to fully mitigate the risks presented by hazards such as the ingress of rain, hail, ice, snow and dust, the effects of wind, the presence of wildlife such as birds, rodents, etc.



With such an awareness, EASA, as competent authority for Foreign Part-145 organisations, has already published its expectation for hangars equipped with doors in the document UG.CAO.00024 (Foreign Part-145 – MOE User Guide). This was initially published in 2015 with the revision -005 and currently valid in its revision -008.

The related amending regulation introducing SMS is expected to be adopted by the European Commission **at the end of 2021 and to become applicable 1 year later**. After that date, a risk management approach will be taken to assess the adequacy of the facilities used for Aircraft Base Maintenance and considering the intended scope of work.

For the execution of limited Base Maintenance tasks, as described in the above AMC1 145.A.25(a), being for example tasks with limited disassembly, inspection, repair, etc., facilities other than an enclosed hangar could be acceptable subject to a risk assessment, considering the probability and the consequences of the presence of the different hazards, such as local environmental conditions, etc.

At the same time, this implies that any hangar or similar facility used for Aircraft Base Maintenance other than limited disassembly, inspection, repair, etc. is equipped with doors, roof, lateral walls, etc., conforming a “closed building structure”.

Therefore, all organisations approved for Aircraft Base Maintenance by EASA, are invited to assess their currently approved facilities, taking into consideration the content of this letter and to evaluate the need for a possible upgrade to ensure that all risks are properly mitigated.

We remain available in case you need additional clarifications.

Yours faithfully,



Lorenzo PELLEGRINI