



EASA

European Aviation Safety Agency

NPA 2015/17: Proposed amendments (Part 3 of 3)

Transfer within the EU Section B - NAA requirements

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- **Transfer within the EU**
- **Section B - NAA requirements**
- In each topic:
 - Summary of the current requirements
 - Summary of main proposed changes



- **Transfer within the EU**
- **Section B - NAA requirements**



Transfer (1/11) - Current requirements

➤ M.A.903

- (a) When transferring an aircraft registration within the EU, the applicant shall:
 - 1. inform the former MS in which MS it will be registered, then;
 - 2. apply to the new MS for the issuance of a new airworthiness certificate in accordance with Part 21
- (b) Notwithstanding M.A.902(a)(3) (the aircraft is not in the register of a Member State), the former ARC shall remain valid until its expiry date.



➤ **21.A.174 Application**

(b)(3) with regard to used aircraft:

(i) originating from a MS, an ARC issued iaw Part M;



Transfer (3/11) – Current requirements

➤ 21.B.326 Application

The NAA shall issue a CofA for:

(a) new aircraft...

(b) used aircraft:

1. upon presentation of the documentation required by point 21.A.174(b)(3) demonstrating that:

- the aircraft conforms to a type design approved under a type certificate and any supplemental type certificate, change or repair approved iaw Part-21; and
- The applicable AD have been complied with; and
- The aircraft has been inspected iaw Part M

2. when the NAA of the MS of registry is satisfied that the aircraft conforms to an approved design and is in a condition for safe operation. This may include inspections by the NAA of the MS of registry.



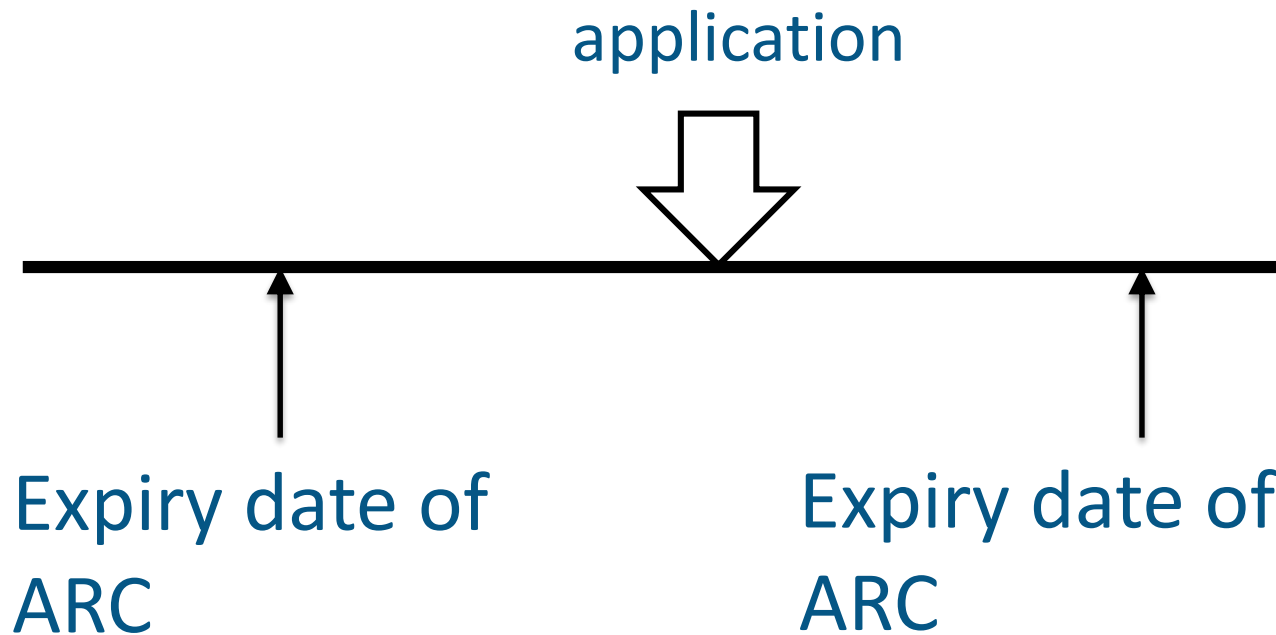
Transfer (4/11) – Current requirements

- Part M and Part 21 not fully consistent at transfer, f.i. Can the NAA inspect the aircraft before issuing the CofA but not the ARC?
- Although ARC is mutually recognised, some NAA perform a “mini” airworthiness review instead of automatically validate the ARC
- Responsibilities not clear: NAA validates ARC, before/at the same time issue CofA? Owner/CAMO responsibilities?
- Can the ARC be validated before having new AMP?
- If ARC has expired, how “ARC iaw Part M” is interpreted?



Transfer (5/11) – Proposal

- The transfer process starts when the application to the new competent authority for a new airworthiness certificate is submitted





Transfer (6/11) – Proposal

- This application allows the proper transfer of information between the two competent authorities during the aircraft transfer process
- Following a risk-based approach, the NAA may verify with the former MS of registry the airworthiness status of the aircraft
- A statement signed by the owner/CAMO is requested before validating the ARC with the new registration



Transfer (7/11) – Proposal

- CAMO/owner send a **statement** to the NAA (before ARC validation):
 - the aircraft has a maintenance programme;
 - all required maintenance specified by the maintenance programme has been carried out;
 - known defects have been corrected or, when applicable, carried forward in a controlled manner;
 - all modifications and inspections deemed mandatory have been carried out as required; and
 - all aircraft records are under control.



Transfer (8/11) - Proposal

- **NAA should evaluate the statement** to be satisfied that the transfer process takes place in a controlled manner, the aircraft is under control, and the owner/CAMO is aware of their responsibilities
- The CAMO or the NAA (if there is no CAMO) are **responsible for validating** the ARC with the new registration
- On the other hand, **monitoring of aircraft recently transferred** is increased by introducing it into the ACAM programme and/or product survey of the approved organisation



Transfer (9/11) - Proposal

- (AMC/GM) An appropriate maintenance programme is needed before issuing or validating an airworthiness review certificate
- A bridging check is to be carried out if there are differences between the former maintenance programme and the new maintenance programme



Transfer (10/11) - Proposal

➤ 21.A.174 Application

➤ (...) shall include:

➤ (...)

➤ (3) with regard to used aircraft:

➤ (i) originating from a Member State:

- ▶ an airworthiness review certificate issued in accordance with Part-M; and
- ▶ a copy of the certificate of airworthiness or restricted certificate of airworthiness with the former registration.



Transfer (11/11) - Proposal

➤ A valid ARC is:

- the current ARC from the previous MS of registry; or
- only if the former ARC has expired, a certificate issued in accordance with M.A.901, following AR performed by an approved organisation.

➤ **21.B.326 Certificate of airworthiness**

- Specific point for used aircraft originating from a MS: upon presentation documentation 21.A.174



- Transfer within the EU
- **Section B - NAA requirements**



Section B – NAA requirements (1/10)

- Several NAA requirements contained in the “Section A” could be further detailed in the corresponding “Section B” material
- Reinforcement of oversight
- Same standard as industry (how to assess supervision ARS, who can perform a AR and sign)
- Record keeping



Section B – NAA requirements (2/10)

- SECTION B — PROCEDURES FOR COMPETENT AUTHORITIES
- (...)
- SUBPART I — AIRWORTHINESS REVIEW CERTIFICATE
- M.B.901 ~~Assessment of recommendations~~
Airworthiness review by the competent authority
- M.B.902 ~~Airworthiness review by the competent authority~~
Assessment of airworthiness review staff
- M.B.903 ~~Findings~~
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



Section B – NAA requirements (3/10)

- **M.B.901 ARC issued by NAA**
- When? after
 - performing the AR; or
 - assessment of a recommendation
- NAA shall carry out the AR:
 - whenever circumstances reveal the existence of a potential safety threat; or
 - when the aircraft is managed by a CAMO located in a non-EU Member State; or
 - for ELA2 aircraft, if requested by the owner/operator.
- Qualification of staff performing AR as ARS.
- After satisfactory completion of the AR, the staff that has carried out this AR shall issue an ARC valid for one year.



Section B – NAA requirements (4/10)

➤ **M.B.902 Assessment of ARS**

- Before accepting the staff to perform the ARs, the NAA shall assess he/she during an AR under supervision
- Guidance on how to perform assessment (same standard than industry)



Section B – NAA requirements (5/10)

➤ **M.B.903 Assessment of recommendations**

- The NAA may issue an ARC directly or after performing:
 - a complete or partial assessment of the recommendation; or
 - a complete AR.
- (AMC) NAA should verify that a complete and accurate assessment of the airworthiness of the aircraft through a AR has been carried out



Section B – NAA requirements (6/10)

➤ **M.B.903 Assessment of recommendations**

- The authorised personnel assessing the recommendation, when satisfied that the aircraft is airworthy, shall issue the ARC.
- (AMC) ARS of the NAA are already considered to be authorised personnel to review the recommendation.



Section B – NAA requirements (7/10)

- **M.B.904 Transfer of aircraft registration within the EU**
 - NAA may contact the former MS of registry for the transfer of information.
 - If the continuing airworthiness of the aircraft is not managed by a CAMO, the NAA shall validate the existing ARC with the new registration upon presentation of the statement.
 - The NAA shall include at the earliest opportunity the aircraft into the Aircraft Continuing Airworthiness Monitoring (ACAM) programme or product survey of the approved organisation(s).



Section B – NAA requirements (8/10)

➤ **M.B.905 Import of aircraft into the EU**

- The NAA shall issue an ARC for a new or used aircraft coming from a non-EU Member State in addition to the appropriate certificate of airworthiness.



Section B – NAA requirements (9/10)

➤ **M.B.907 Record keeping**

- Records of its ARS and authorised personnel assessing recommendations for 2 years after these staff have left the organisation.
- Recommendations made to the competent authority shall be kept for 3 years after the recommendation was submitted or the ARC, whichever is later.
- All records relating to ARs carried out by NAA shall be kept for 3 years after the review was carried out.
- NAA shall keep true copies of all ARC it issues.



Section B – NAA requirements (10/10)

➤ **M.B.604 – M.B.704 – 145.B.30**

➤ **CONTINUATION OF APPROVAL**

➤ The performance of an airworthiness review shall be audited



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Questions?

Thank you

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