

How Do I Manage the Competence and provide Certification Authorisation related to Engine Running / Borescope and Component Maintenance Staff in a Third Country EASA Part 145 Approved Organisation?

Steve Bentley MD of Sofema Aviation Services looks at the Regulatory position and considers the organisations options.

Initial Consideration

EASA Part 147 Training is only applicable to EASA Part 66 Basic Licence Training and Type Licence Training.

Please Note Specific Training for Staff involved in the Certification of Components and Performance of Engine Running / Borescope Inspections is **NOT** covered by Part 147 Privilege.

So how is it managed and do the courses need to comply with EASA Requirements?

Essentially yes, they should be compliant with EASA “Objectives and Principles” but note that it is the EASA Part 145 organisation which is responsible to manage the competence of the organisations certifying staff.

So what are EASA Compliant Regulatory Training Courses?

They are courses which either meet the specific need of the organisation as required by EASA 145 or other relevant regulations or add value to the company need to improve competence.

Note however as mentioned they are outside of the remit of any EASA 147 Organisation.

For example there is no defined organisation approval to deliver the following training course – Human Factors to comply with EASA 145.A.30, Fuel Tank Safety and EWIS. This situation also applies to and includes many other courses which add value to the competence of the delegate whether it is related to Part 145, Part M, Part 21, Part ORO approved organisation or ATO.

This includes specialised courses including Component Maintenance, Borescope and Engine Running.

Who can approve such “non 147 training courses”?

More Specifically Does the Regulator have to directly approve such EASA compliant regulatory training directly?

The Organisations EASA 145 compliant training process should be clearly documented by the organisation and accepted by the CA typically by documenting within the Maintenance Organisation Exposition MOE

The Competent Authority / Regulator Authority may perform any audit in support of oversight of an approved organisation as it sees fit – usually the CA/RA is accepting of the decisions made by the receiving organisation, based on the competence selection and management processes as accepted typically through the Vendor Approval Process / Quality Assurance Process.

Why is there no “approval” for EASA Regulatory training organisations?

Because as EASA Quality Managers will attest (Confirm) the responsibility for “training standards” ultimately lies with the organisation itself?

This responsibility essentially means that the organisation must ensure that it manages the competence of its staff, to ensure they (the staff) are able to deliver their required role in the most effective way.

(This also includes any required training for compliance with 145 certification objectives for example)

Does this mean that organisations cannot therefore rely on a “pre-approved solution” for example an accredited regulatory training organisation?

Absolutely!!

Important Note - This option does not exist in EASA

Why?..... because EASA recognizes and understands that ultimately the organisation must assume responsibility for the standard of training

The organisation should itself start with a training objective, then to measure this against the product offered (gap analysis) – finally to assess the delivery process for instructional competency – this is the EASA process.

Consider the following as a general guide to elements to be considered.

a) Does the Staff member already hold approval with the organisation

- b) Is there a documented organisation training program and standard managed by the organisation and acceptable to the Quality Assurance System?
- c) Is there a nominated theoretical experienced trainer authorised by the organisation acceptable to the Quality Manager who can conduct the theory element of the training.
- d) Is there a nominated practical experience trainer authorised by the organisation acceptable to the Quality Manager who can conduct the practical element of the training.
- e) Are facilities tooling and equipment available as required to support the objective

NOTE - Under the EASA system it is the responsibility of the organisation to ensure that any additional (To Part 147) training is compliant, not just with EASA regulations but also with the internal competence management and oversight requirements of the Organisation.

See the following information redacted from EASA Third Country 145 User Guide regarding an acceptable alternative related to Component Maintenance Approval

**UG.CAO.00126-003 Approval Date 22/10/2015 - Foreign Part- 145 approvals
Components, engines and APU certifying staff**

1.3.2. Technical training requirements.

1.3.2.1. Component training.

Depending on the complexity and the technology of the component, the CC/S shall be able to demonstrate he/she received appropriate theoretical and practical component training from:

the OEM or;

the OEM recognized training organization or;

***An appropriately rated maintenance organisation provided:
to the person nominated to carry out the training can demonstrate he/she has
received training to an appropriate level for the subject component;***

***The person nominated to carry out the training is appropriately authorized by the
maintenance organisation and is able to demonstrate a significant experience on
the relevant component maintenance;***

***The training syllabus has been reviewed by the Engineering Manager and/or the
Quality Manager;***

The component is available for practical training purpose;

For simple component, the maintenance organisation may take credit of the CC/S experience and/or a previous training on a component from the same family and same technology.

1.3.2.2. Bench test training.

Where there is a need to use Bench test (e.g. engine or ATEC bench test), the CC/S shall be able to demonstrate he/she received appropriate training. This training for the use of specific tools required by the OEM maintenance data shall be received from:

The OEM or;

The bench test manufacturer or;

An appropriately rated maintenance organisation.

1.3.2.3. Specific equipment training.

Where there is a need to use specific equipment, the CC/S shall be able to demonstrate he/she received the appropriate training.

This training for the use of specific tools required by the OEM

Maintenance data shall be received from:

The OEM or;

The specific tool manufacturer or;

An appropriately rated maintenance organisation.

What Approval is Required to Deliver EASA Compliant Regulatory Training?

The approval comes from the receiving (Part 145 or Part ORO) organisation, EASA does not issue any authority for organisations to deliver regulatory training.

What Approval does a Part 147 hold?

A Part-147 organisation approval only grants privileges related to courses and examinations required by Part-66 (Basic and Type Licence).

As a consequence, the privileges of a Part-147 organisation do not include providing other courses such as, but not limited to, Human Factors, EWIS, FTS, Regulations, Engine Run-Up, Procedures, etc.

(this is a statement from EASA on record with SAS)

Please note that often an EASA Part 147 Type Training organisation simply does not have the competence to deliver effective regulatory training.

Important Note - the recipient organisation should understand that the responsibility for compliance sits firmly with the recipient and there is no “credit” in respect of a 147 “completion certificate”.

Always confer with your Organisations Quality Assurance Manager and you Competent Authority for final clarification of applicable circumstances related to your own organisation.

For details of Sofema Aviation Consulting or Regulatory and Competence Building Training Services please see www.sassofia.com or email office@sassofia.com