

## **Introduction to New EASA Part M Regulatory Implications & Terms**

### **Annex Va – Annex Vb - Annex Vc- Annex Vd**

Steve Bentley CEO of Sofema Aviation Services ([www.sassofia.com](http://www.sassofia.com)) looks at the regulatory implications of the New Part M and explains the new terms and what they mean.

#### **Implementation Date – 24 March 2020**

Following the Implementation Date - each aircraft must follow either Part-M or Part-ML standard, and any person or organisation involved in continuing airworthiness must comply with Part-M, or Part-ML or both, depending on the scope of activities (related type(s) of aircraft and operation(s)).

#### **Annex Va (Part-T)**

Requirements for 3rd country a/c dry leased by an AOC

#### **Annex Vb Part-ML**

Continuing airworthiness standards – 'light aircraft' not used by licenced air carrier

#### **Annex Vc Part-CAMO**

Continuing airworthiness management organisation (all types of aircraft types and operation)

#### **Annex Vd Part-CAO**

Combined (continuing airworthiness management and/or maintenance) organisation – non-complex aircraft and non-licenced air carrier

#### **Existing Part M Subpart F & G Approvals are being designated as**

Part-MG' and 'Part-MF' will designate respectively

'Part-M Subpart F' (Part-MF')

'Part-M Subpart G' (Part-MG')

**Note1 Concerning Part ML** - This is the only option for Light A/C not used by Licenced Air Carrier. (other options not allowed)

**Note 2 Concerning Part ML** - all types of organisations provided for in this Regulation 1321/2014 (Part-CAMO, Part-CAO, Part-145) may be involved in continuing airworthiness activities for aircraft following Part-ML.

#### **What is the Difference between Part-CAO & Part CAMO?**

**Part-CAMO** provides requirements for Continuing Airworthiness Management Organisation (CAMO): compared with Part-M Subpart G organisation, the main difference is the introduction of SMS principles.

**Part-CAO** provides a new set of requirements for Combined Airworthiness Organisation: such organisation may perform CAMO activities or Maintenance Organisation activities, or both, but limited to non-complex aircraft not used by a licenced air carrier.

In Part-CAO there is no “base” and “line” maintenance and therefore there is no “support staff” vs “certifying staff”.

As stated in CAO.A.040, Certifying staff shall exercise their privileges to release maintenance if the CAO has ensured:

That these certifying staff meet the requirements of point (b) of point 66.A.20 of Annex III (Part-66) except when paragraph 6 of Article 5 refers to a national regulation of a Member State, in which case, they shall meet the requirements of such a regulation;

That these certifying staff have an adequate understanding of the relevant aircraft or aircraft component(s) to be maintained, or both, as well as of the organisation procedures required to perform such maintenance.

### **Note 3 Concerning Part-CAMO and Part-CAO**

These **Part-CAMO** and **Part-CAO** organisations are supposed to gradually replace Part-M Subpart F and Part-M Subpart G organisations.

In accordance with Article 4 of Regulation (EU) 1321/2014 as amended, **after 24 September 2021, there should be no more Part-M Subpart F and Part-M Subpart G organisations.**

### **Existing Approved Organisations Subpart F & Subpart G – What will Happen?**

If existing approved organisation do not transition to Part-CAO or CAMO:

Part-145 organisation may continue their activities with their Part-145 approval;

Part-M Subpart F organisation may continue their activities with the Part-MF approval only until 24 September 2021;

Part-M Subpart G organisation may continue their activities with the Part-MG approval only until 24 September 2021.

### **Continuing Airworthiness of aircraft following Part-ML**

AMP of Part-ML aircraft shall be developed iaw ML.A.302.

### **Note 4 Part-ML Approved Maintenance Program (AMP)**

These AMP are no longer approved by the competent authority.

They are approved by the CAMO or CAO (or declared by the owner if no CAMO/CAO is contracted). A new privilege of AMP approval is added in this respect to Part-MG organisations (M.A.711(a)(5)).

**Note 5: Grandfather Rights - Approved Maintenance Program (AMP) (Part-ML)**

Existing AMPs approved in compliance with M.A.302 before 24 March 2020 continue to be valid after 24 March 2020.

Defect management shall be performed according to ML.A.403

AMP development privilege for ELA2 aircraft not used in commercial operation is removed from Part-M Subpart F and Part-145. Concerned organisations are no longer allowed to process AMPs.

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