

Notes Concerning Forthcoming Changes to EASA Regulations Related to Maintenance Procedures for General Aviation Aircraft

EASA advises they are focusing on reducing the Complexity of Implementing rules related to the lower risks associated with General Aviation.

A summary of Changes include:

PART M Light (Does Not Apply to Commercial Air Transport CAT but can apply to COM – Commercial other than Commercial Air Transport) (Also Not CMPA)

Part-ML will be also known as Annex Vb

Part-ML proposes alleviations for

Aircraft maintenance programmes (AMPs),

Airworthiness reviews and

Deferment of defects,

(This means that all sailplanes and balloons are covered by this Part-ML.)

Possibility for maintenance organisations to perform airworthiness reviews and issue the ARC together with the 100h/annual inspection.

Minimum Inspection Programmes:

Can be used instead of manufacturer data.

If manufacturer data is used, the declared/approved AMP cannot go below the Minimum Inspection Programme.

Template for the AMP: (In order to facilitate and standardise the development of the AMP).

Deferment of defects by the pilot (for aircraft operated under NCO):

Possible for the pilot to defer defects with the agreement of the owner.

ARC document:

Part-ML contains only the Form 15c.

Part-M contains the Forms 15a and 15b.

1. The continuing airworthiness of aircraft referred to in Article 1(a) and components for installation thereon shall be ensured in accordance with the requirements of:

(a) Annex Vb (Part-ML) for the following aircraft when they are not listed in the air operator certificate of an air carrier licensed in accordance with Regulation (EC) No 1008/2008 and when they are not classified as complex motor-powered aircraft:

(i) aeroplanes of 2 730 kg maximum take-off mass or less;

(ii) rotorcraft of 1 200 kg maximum take-off mass or less, certified for a maximum of up to 4 occupants;

(iii) LA2 aircraft; and

(b) Annex I (Part-M) for all other aircraft.

(NOTE – This is the existing Part M approval – With some Modifications & Changes)

Transfer from PART ML to PART M

Aircraft complying with Part-ML can be transferred to the Part-M continuing airworthiness regime after complying with the following requirements:

(a) the aircraft maintenance programme is approved by the competent authority in accordance with M.A.302 of Part-M;

(b) any due maintenance required by the 2(a) approved maintenance programme is performed; and

(c) an airworthiness review is performed, and a new airworthiness review certificate is issued in accordance with M.A.901 of Part-M.

Organisations and personnel involved in the continuing airworthiness of aircraft referred to in Article 1(a) and components for installation thereon, including maintenance, shall comply with the applicable requirements of Annex I (Part-M) and Annex Vb (Part-ML)

NOTE – Maintenance programmes complying with the requirements applicable before entry into force of the new Regulation shall be deemed to comply with the requirements set out in this Regulation.

Combined Organisation Approval (Part-CAO)

Applicable to non-complex non-CAT aircraft (some aircraft will follow Part-M and others Part-ML)

Combines the privileges of a Subpart-F maintenance organisation and a CAMO.

No SMS: They will continue with the current Quality System (or organisational reviews if the organisation is small).

Introduces simplified requirements – Combined privileges for maintenance, continuing airworthiness management, airworthiness reviews and permit to fly.

Single Exposition for all Activities.

The approval certificate has been simplified, with no indication of aircraft types, just aircraft categories.

Part-CAO, Annex Vd to Regulation (EU) No 1321/2014) with alleviated requirements and with combined privileges for Maintenance,

Continuing-airworthiness management,

Airworthiness reviews and permits to fly.

Appropriate conversion requirements and transition measures have been introduced in order to facilitate the existing Part-145, Part-M, Subpart F and Subpart G organisations in obtaining the new Part-CAO approval.

This new Part-CAO approval is applicable to other-than-complex motor-powered aircraft not listed in the AOC of an air carrier licensed in accordance with Regulation (EC) No 1008/2008, and does not contain safety management system (SMS) requirements.

Continuing Airworthiness Approvals

Approvals for organisations involved in the continuing airworthiness of aircraft and components for installation thereon, including maintenance, shall be issued in accordance with the requirements of

Annex II (Part-145),

Annex Vc (Part-CAMO)

or Annex Vd (Part-CAO).

Organisations holding an approval issued in accordance with Annex I (Part-M) Subpart F, Annex I (Part-M) Subpart G, or Annex II (Part-145), shall, upon application to the competent authority, be issued a Part-CAO approval with the same privileges already held but not exceeding the privileges applicable to a Part-CAO organisation, and be granted a 2-year period to correct any findings.

Part CAMO

The new Annex Vc 'Part-CAMO' will supersede the current Subpart G of Annex I (Part-M) to Commission Regulation (EU) No 1321/2014.

The changes introduced to the Part-M Subpart G requirements are largely aligned with the general authority and organisation requirements adopted in the other domains (Aircrew, Air Operations, ADR, ATM/ANS).

Annex Vc 'Part-CAMO' to Commission Regulation (EU) No 1321/2014 dedicated to continuing airworthiness management organisations (CAMOs), which are managing aircraft operated by licensed air carriers and/or complex motor-powered aircraft (CMPA), representing an estimated 65 % of all currently approved CAMOs.

Only Part-CAMO-approved continuing airworthiness management organisations will be required to implement SMS based on a set of proportional management system requirements.

Part-CAMO-approved organisations may also manage the continuing airworthiness of other than CMPA and aircraft not used by licensed air carriers.

For questions or comments please email us at team@sassofia.com