

## EASA Part 145 Organisation – Aircraft Component Robbery Procedures Considerations

Sofema Online (SOL) [www.sofemaonline.com](http://www.sofemaonline.com) considers the key aspects related to robbing components during a Maintenance Check and the procedures which need to be followed.

### Introduction – The use of EASA Form 1

AMC1 145.A.50(d) Certification of maintenance ED Decision 2022/011/R

The purpose of the certificate is to certify maintenance work carried out on assemblies / items / components/parts (hereafter referred to as 'item(s)'). It also allows the removal from aircraft of items in a 'serviceable' condition in accordance with AMC2 145.A.50(d) in order to fit them to another aircraft/aircraft component.

- The certificate is to be used for export/import purposes, as well as for domestic purposes, and serves as an official certificate for items from the manufacturer/maintenance organisation to users.
- It can only be issued by organisations approved by the particular competent authority within the scope of the approval.
- The certificate may be used as a rotatable tag by utilising the available space on the reverse side of the certificate for any additional information and dispatching the item with two copies of the certificate so that one copy may be eventually returned with the item to the maintenance organisation.

**Note 1** The alternative (Sofema Recommended solution) is to use existing Rotatable tags and also supply a copy of the certificate.

**Note 2** A certificate should not be issued for any item when it is known that the item is unserviceable except in the case of an item undergoing a series of maintenance processes at several maintenance organisations approved under Part-145 and the item needs a certificate for the previous maintenance process carried out for the next maintenance organisation approved under Part-145 to accept the item for subsequent maintenance processes.

- In such a case, a clear statement of limitation should be endorsed in Block 12. AMC2 145.A.50(d) Certification of maintenance

### Ref ED Decision 2020/002/R

- A component which has been maintained off the aircraft needs the issuance of a certificate of release to service for such maintenance and another certificate of release to service in regard to being installed properly on the aircraft when such action occurs.

**Note 3** - When an organisation maintains a component for use by the same organisation, an EASA Form 1 may not be necessary depending upon the organisation's internal release procedures defined in the maintenance organisation exposition.

### Aircraft Removed From Service

In the case of the issue of EASA Form 1 for components in storage before Part-145 and Part-21 became effective and not released on an EASA Form 1 or equivalent in accordance with 145.A.42(a) or removed serviceable from a serviceable aircraft or an aircraft which has been withdrawn from service the following applies:

- An EASA Form 1 may be issued for an aircraft component which has been:
  - Maintained before Part-145 became effective or manufactured before Part-21 became effective.
  - Used on an aircraft and removed in a serviceable condition. Examples include leased and loaned aircraft components.
  - Removed from aircraft which have been withdrawn from service, or from aircraft which have been involved in abnormal occurrences such as accidents, incidents, heavy landings or lightning strikes.
  - Maintained by an unapproved organisation.

### **EASA Form 1 Authority**

- An appropriately rated maintenance organisation approved under Part-145 may issue an EASA Form 1 as detailed in this AMC subparagraph as appropriate, in accordance with procedures detailed in the exposition as approved by the competent authority.
- The appropriately rated organisation is responsible for ensuring that all reasonable measures have been taken to ensure that only approved and serviceable aircraft components are issued an EASA Form 1 under this paragraph.
- For the purposes of this AMC No 2 only, appropriately rated means an organisation with an approval class rating for the type of component or for the product in which it may be installed.
- An EASA Form 1 issued in accordance with this paragraph 2 should be issued by signing in block 14b and stating 'Inspected/Tested' in block 11. In addition, block 12 should specify:
  - When the last maintenance was carried out and by whom.
  - If the component is unused, when the component was manufactured and by whom with a cross-reference to any original documentation which should be included with the Form.
  - A list of all airworthiness directives, repairs and modifications known to have been incorporated. (If no airworthiness directives or repairs or modifications are known to be incorporated, then this should be so stated).
  - Detail of life used for life-limited parts and time-controlled components being any combination of fatigue, overhaul or storage life.
  - For any aircraft component having its own maintenance history record, reference to the particular maintenance history record as long as the record contains the details that would otherwise be required in block 12. The maintenance history record and acceptance test report or statement, if applicable, should be attached to the EASA Form 1.

## **New/unused aircraft components**

- Any unused aircraft component in storage without an EASA Form 1 up to the effective date(s) for Part-21 that was manufactured by an organisation acceptable to the competent authority at that time may be issued with an EASA Form 1 by an appropriately rated maintenance organisation approved under Part-145.
- The EASA Form 1 should be issued in accordance with the following subparagraphs which should be included in a procedure within the maintenance organisation manual.

**Note 4:** It should be understood that the release of a stored but unused aircraft component in accordance with this paragraph represents a maintenance release under Part-145 and not a production release under Part-21.

- It is not intended to bypass the production release procedure agreed by the Member State for parts and subassemblies intended for fitment on the manufacturers' own production line.
  - An acceptance test report or statement should be available for all used and unused aircraft components that are subjected to acceptance testing after manufacturing or maintenance as appropriate.
  - The aircraft component should be inspected for compliance with the manufacturer's instructions and limitations for storage and condition including any requirement for limited storage life, inhibitors, controlled climate and special storage containers. In addition or in the absence of specific storage instructions the aircraft component should be inspected for damage, corrosion and leakage to ensure good condition.
- The storage life used of any storage life-limited parts should be established.
  - If it is not possible to establish satisfactory compliance with all applicable conditions specified above:
    - The aircraft component should be disassembled by an appropriately rated organisation and subjected to a check for incorporated airworthiness directives, repairs and modifications and inspected/tested in accordance with the maintenance data to establish satisfactory condition and, if relevant, all seals, lubricants and life-limited parts should be replaced.
    - Upon satisfactory completion after reassembly, an EASA Form 1 may be issued stating what was carried out and the reference of the maintenance data included.

## **Used aircraft components removed from a serviceable aircraft**

Subject to satisfactory compliance with the following an EASA Form 1 may be issued and should contain the information as specified in including the aircraft from which the aircraft component was removed.

- Serviceable aircraft components removed from a Member State registered aircraft may be issued with an EASA Form 1 by an appropriately rated organisation subject to compliance with this subparagraph.
  - The organisation should ensure that the component was removed from the aircraft by an appropriately qualified person.
  - The aircraft component may only be deemed serviceable if the last flight operation with the component fitted revealed no faults on that component/related system.
  - The aircraft component should be inspected for satisfactory condition including in particular damage, corrosion or leakage and compliance with any additional maintenance data.
  - The aircraft record should be researched for any unusual events that could affect the serviceability of the aircraft component such as involvement in accidents, incidents, heavy landings or lightning strikes.
  - Under no circumstances may an EASA Form 1 be issued in accordance with this paragraph if it is suspected that the aircraft component has been subjected to extremes of stress, temperatures or immersion which could affect its operation.
  - A maintenance history record should be available for all used serialized aircraft components.
  - Compliance with known modifications and repairs should be established.
  - The flight hours/cycles/landings as applicable of any life-limited parts and time-controlled components including time since overhaul should be established.
  - Compliance with known applicable airworthiness directives should be established.

### **Important – Non Member States**

- Serviceable aircraft components removed from a non-Member State registered aircraft may only be issued with an EASA Form 1 if the components are leased or loaned from the maintenance organisation approved under Part-145 who retains control of the airworthiness status of the components.
- An EASA Form 1 may be issued and should contain the information as specified in paragraph 2.4 including the aircraft from which the aircraft component was removed.

### **Used aircraft components removed from an aircraft withdrawn from service.**

Serviceable aircraft components removed from a Member State registered aircraft withdrawn from service may be issued with an EASA Form 1 by a maintenance organisation approved under Part-145 subject to compliance with this subparagraph.

- Aircraft withdrawn from service are sometimes dismantled for spares. This is considered to be a maintenance activity and should be accomplished under the control of an organisation approved under Part-145, employing procedures approved by the competent authority.

- To be eligible for installation, components removed from such aircraft may be issued with an EASA Form 1 by an appropriately rated organisation following a satisfactory assessment.
- As a minimum, the assessment will need to satisfy the standards set out above as appropriate.
  - This should, where known, include the possible need for the alignment of scheduled maintenance that may be necessary to comply with the maintenance programme applicable to the aircraft on which the component is to be installed.

**Note 5** - Irrespective of whether the aircraft holds a certificate of airworthiness or not, the organisation responsible for certifying any removed component should ensure that the manner in which the components were removed and stored are compatible with the standards required by Part-145.

- A structured plan should be formulated to control the aircraft disassembly process.
- The disassembly is to be carried out by an appropriately rated organisation under the supervision of certifying staff who will ensure that the aircraft components are removed and documented in a structured manner in accordance with the appropriate maintenance data and disassembly plan.
- All recorded aircraft defects should be reviewed and the possible effects these may have on both normal and standby functions of removed components are to be considered.
- Dedicated control documentation is to be used as detailed by the disassembly plan, to facilitate the recording of all maintenance actions and component removals performed during the disassembly process.
- Components found to be unserviceable are to be identified as such and quarantined pending a decision on the actions to be taken.
- Records of the maintenance accomplished to establish serviceability are to form part of the component maintenance history.
- Suitable Part-145 facilities for the removal and storage of removed components are to be used which include suitable environmental conditions, lighting, access equipment, aircraft tooling and storage facilities for the work to be undertaken.
- While it may be acceptable for components to be removed, given local environmental conditions, without the benefit of an enclosed facility, subsequent disassembly (if required) and storage of the components should be in accordance with the manufacturer's recommendations.

**Used aircraft components maintained by organisations not approved in accordance with Part-145.**

- For used components maintained by a maintenance organisation not approved under Part-145, due care should be taken before acceptance of such components.
- In such cases an appropriately rated maintenance organisation approved under Part-145 should establish satisfactory conditions by:

- Dismantling the component for sufficient inspection in accordance with the appropriate maintenance data;
- Replacing all life-limited parts and time-controlled components when no satisfactory evidence of life used is available and/or the components are in an unsatisfactory condition;
- Reassembling and testing as necessary the component;
- completing all certification requirements as specified in 145.A.50.

#### **Used aircraft components removed from an aircraft involved in an accident or incident.**

- Such components should only be issued with an EASA Form 1 when processed in accordance with the above and a specific work order including all additional necessary tests and inspections deemed necessary by the accident or incident.
- Such a work order may require input from the TC holder or original manufacturer as appropriate. This work order should be referenced in block 12

#### **Next Steps**

Sofema Aviation Services ([www.sassofia.com](http://www.sassofia.com)) and Sofema Online ([www.sofemaonline.com](http://www.sofemaonline.com)) provides Classroom, Webinar and Online EASA Compliant Logistics Training. Please see the websites or email [team@sassofia.com](mailto:team@sassofia.com)

#### **Join Our Webinar**

Join us for a free Aviation Stores and Logistics Webinar Workshop. Take advantage of the latest insights and expand your skill set. - <https://products.sofemaonline.com/logistics-month/>

**Date: 27 June 2024**  
**Starting time: 10:30 – 12:45**