

Seeking EASA Third Country Approval – Essential Reading

Over 15 years of lessons learned related to Organisations seeking and often failing to obtain the original sort after approval.

This is for you if you are seeking any of the following EASA Approvals:

- EASA Third Country Production Organisation Approval – Part 21G (POA),
- Third Country Maintenance Organisation Approval – EASA Part 145 Aircraft Maintenance Organisation Approval (AMO),
- Third Country Continuing Airworthiness Management Approval (CAMO) – EASA Part CAMO and
- Design Organisation Approval - Part 21J (DOA)?
- Internal Development of Maintenance Control Centre

1/ I want an EASA Part 21 G Production Organisation Approval (POA)

2/ I want an EASA Third Country Part 145 Approval

3/ I want a CAMO approval so we can work with European Registered Aircraft

4/ I Want a Maintenance Control Centre (MCC) So we can co-ordinate activities across our business processes

Lessons in common sense and basic awareness presented by Steve Bentley FRAeS CEO of Sofema Aviation Services (www.sassofia.com) and Sofema Online (www.sofemaonline.com)

About the Author

Steve Bentley commenced his aviation career in the North of England in 1971 and in 1976 became the youngest Licensed Aircraft Engineer at the age of 21 and 3 days.

He has spent over 50 years involved and committed to commercial aviation. In 2008 he founded Sofema Aviation Services. He lives in Sofia Bulgaria where Sofema is headquartered.

About Sofema

Sofema Aviation Services (SAS) with Sofema Online (SOL) following in 2013 – currently SAS offers a portfolio of over 1000 courses and SOL offers online access to over 400 Courses, Packages and Diploma's

Sofema Provides consultancy in all the above areas with a small twist on engagement. We can help you to do it for yourself – however we cannot do it for you!

Very Important Note – An EASA Approval is a step on your organisation journey not a destination, many companies make the mistake of failing to understand the relationship between the organisation and the regulatory authority.

A Successful or Less Successful Business?

Successful businesses who hold an EASA approval typically recognise that the organisation functions in the best way when regulatory compliance is embedded within the organisation's ethos – means it is not an aspiration or an added task.

I have personally seen multiple organisations who go about their business and essentially wait to be told that “something” is not correct – then fix that “something” and move on – they are missing the fact they are not in control and not able to shape the business process in the optimum way rather they are simple being re-active

A simple story that often repeats starts when the organisation receives findings associated with a regulatory audit - Means the regulatory authority have identified a non-conformity with a particular regulatory requirement.

- The first question is why has the Business Area Owner or Manager did not identify this shortfall – So quite serious
 - Try looking inwards at the competence of the Business Area Owners – are they fully knowledgeable regarding both the external and internal requirements?
 - Do they have the Manpower and Resources to address these requirements?

- The Second Question is why the Organisations Compliance System not identified that the Business Area Owner is none compliant?
 - This is even more serious. The Compliance Manager (CM) is the gatekeep of the organisation – the protector of the approval therefore under normal circumstances the CM should be waiving a Red flag a long time before any issues become serious.

Take Aways

- *The Competent Authority should not be finding any significant nonconformities.*
- *The organisation must have sufficient regulatory competence across the business in order to maximize its opportunities – simply ticking the box is never going to be the best solution.*

- *Ensure all business leaders are fully competent within the associated regulatory environment – such knowledge minimizes wrong turns and costly mistakes.*
- *The Compliance Manager should assume personal responsibility for every finding which is identified by either an external auditor or the regulatory authority – Consider how is it possible for someone to visit your organisation and find things wrong when you are involved 24/ 7?*

Anecdotal Story Related to Failure to Achieve EASA 145 Approval.

Sofema was requested to support an organisation who was trying to obtain third Country 145 approval and had spent over 18 months on the project.

The reason for contacting Sofema was the receipt of over 20 Findings from EASA (Having previously responded to a similar No of findings) So really did not know how to proceed.

Essentially – they could not understand how after fixing everything which was identified as “wrong” they were back at square 1

The first lesson they faced was to understand that EASA do not provide you with a definitive shopping list of Findings

- If your organisation is a mess they will provide you with a core understanding of major areas of issues, however it is in no way a definitive list.
- EASA will not involve directly in your organisation by providing you with specific guidance, however they (EASA) do in fact provide very detailed generic guidance – It is so important to read and understand all the guidance material.

See here for EASA Part 145 Third Country Guidance

- <https://www.easa.europa.eu/en/domains/aircraft-products/continuing-airworthiness-organisations/foreign-part-145-organisations>

This particular organisation had the thickest 145 MOE we have ever seen – over 500 pages and it included everything including Basic and Type Training and CAMO related Roles and Responsibilities. (More is definitely not better and irrelevant content is actually a negative in your submission)

There was no happy ending in this story – Sofema Presented them with an action plan to ensure they would receive their approval however by this time they had funding issues

Take Aways

- *Ensure that your organisation has sufficient competent manpower within your organisation to understand the fundamental criteria by which you can work to obtain your approval and to deliver on all the required elements.*

Important Note - You should reject the notion that you can buy an off the shelf approval by seeking a third-party organisation supporting you, who then offer to do it for you for a fee (ultimately this route will be financially painful (see later for explanation and rationality) ultimately this route will be financially painful (see later for explanation and rationality).

Reality Check - The Only Ultimately Successful Route is You to Take Control. Of Course, Consultation & Guidance is often very beneficial – However holding hands is not the same as taking you by the Hand – Do you see the Difference?

Case Studies - We always (In 100% of our business relationships) maintain confidentiality. We will not disclose the name of the company or the country – the purpose of this paper is to help organisations help themselves in the most cost-effective way.

1/ I want an EASA Part 21 G Production Organisation Approval (POA)

In this example a company popped up and shared their intention to obtain a POA approval and asked for a quotation to provide assistance to achieve.

Background – This company, with around 50 employees, had engineering capacity (not aviation) and believed an opportunity existed to capitalize on this expertise by obtaining a POA to manufacture aviation parts.

The request was to provide an offer to help the company obtain a POA – Many of our relationships have started like this and over the years we have changed our process of engagement – means we will engage fully however we must ensure the company has its eyes open and is aware of what it actually wants. If the response is they are not sure and want to undertake a feasibility study, then of course we will support this task. Sofema's fees are fully transparent and very reasonable we are happy to invoice you for our consulting time.

However this potential client advised that they wanted a general POA Approval (which of course does not exist) and will then decide what they will manufacture. Demonstrating a total lack of understanding

A great deal of time was spent (At Sofema Cost) explaining the fundamentals of DOA – POA Relationship – The Role of POA – The Need to establish and manage a competent manpower resource – The process of Certification – The use and Generation of Approved data etc (SB's and SL's) How Data and Documentation is managed.

At a certain point the whole process collapsed as the client's balloon was burst on realizing the complexities and challenges of achieving an approval were not going to be tenable.

Additional Comments EASA Part 21G

It is also apparent that many companies have no knowledge of the cost of running an EASA Approved Business Model (Still with 21G for now) as a successful business

The level of fees payable by applicants for certificates and approvals issued, maintained or amended by the Agency, and of charges for publications, handling of appeals, training and any other service provided by the Agency are determined by [Commission Implementing Regulation \(EU\) 2019/2153](#).

A fundamental understanding is not hard to come by and a good place to Start is Here - <https://www.easa.europa.eu/en/the-agency/faqs/production-organisations-poa>

Visit Sofema Library - <https://sassofia.com/download-area/> here there are almost 50 Relevant free to access documents.

You may also benefit from reading EASA Easy Access Rules for Regulation 748/2011 <https://www.easa.europa.eu/en/document-library/easy-access-rules/online-publications/easy-access-rules-initial-airworthiness-and>

Additionally you may consider www.sofemaonline.com to do a few online courses related to Part 21 as well as a associated subjects such as Quality and Safety

So How to Obtain a POA in the Correct Way

Step 1 – what are you going to make? – Having decided, to then find a Part 21 J DOA who will support your organisation objectives – You will need a contract in place as part of the process to gain approval.

Step 2 – Why are you doing this? – means is there a need which will generate an acceptable revenue to support the structure of your organisation.

Step 3 – Is it financially feasible – Here you need a spread sheet of the costs if you cannot show under reasonable conditions that you will be able to break even in 2 to 3 years and be profitable after 4 to 5 year, there should be a strong rationale for doing so.

2/ I want an EASA Third Country Part 145 Approval

The organisation in this story was large with several hundred employees – They contacted Sofema we signed an NDA and they shared the EASA findings which included a significant amount of training include HF Module 9 and Air Legislation Module 10 plus EASA 145 & HF (I.A.W 145.A.30) So a lot of training.

During a pre – contract assessment visit it was recommended to identify a CORE team who will be responsible for EASA 145 (Note almost everyone selected was also doing other tasks – so the involvement in 145 was almost a side hustle) – Yes for sure a red flag – the first one

Once we understood fully the issues and objectives as well as identifying the CORE team – we also proposed a solution which involved a series of online courses on Sofema Online Platform

See here for EASA Third Country Course Learning Objectives
- <https://www.sofemaonline.com/43-marketing/922-course-learning-objectives-2>

We recommended the students complete the training then sit the exam part under the control of the Quality Assurance Section

What happened? – the Company elected to do “on-site” classroom training however instead of focusing on the CORE team – as we explained the goal was to bring together a knowledgeable team of excellence to satisfy all relevant parts of the 145 Organisational Approval. Unfortunately, instead of focusing on training the core team the entire organization was enrolled in EASA training Courses (against our recommendation) - The expenditure for this (Government funded) exceeded the potential profit from the approval.

Ultimately the failure was connected with the inability of the organisation to develop and assign a core team to focus on all the required aspects of the EASA approval

Note Regarding the Sofema Philosophy – We remain disappointed that the actual cost of the project was approximately 10 times more than our proposed route

- A core tenet of our mission to minimize client costs wherever possible
- Why? because we are looking for lifetime partners not instant gratification

- Sofema Business Approach means this year we will enroll over 35,000 delegates in our online training.

3/ I want a CAMO approval so we can Work with European Registered Aircraft

This client was functioning under the FAA system and was not aware of the process to manage aircraft compliant with EASA Part M & EASA Part CAMO.

Again a great deal of dialogue by Sofema to slowly educate the client and explain the intricacies of managing aircraft to fully comply with EASA requirement

In this case the easy access rules is found here – Regulation EU 1321/2014 <https://www.easa.europa.eu/en/downloads/95788/en>

What is often misunderstood is the background level of Competence required to successfully engage with the CAMO environment

Consider the following which forms part of our special CAMO Diploma – see here for details <https://www.sofemaonline.com/lms/all-courses/183-camo-learning-path-diploma/preview>

All these courses are available together as part of our CAMO Diploma Program

- Aircraft Maintenance Planning Package (5 separate courses in 1 package)
 - Introduction to Aircraft Maintenance Planning in an EASA Environment with VO
 - Aircraft Maintenance Planning in an EASA Environment Fundamentals with VO
 - Aircraft Maintenance Planning Management and Development in an EASA Environment with VO
 - Aircraft Maintenance Planning Optimization Processes in an EASA Environment with VO
 - Advanced Aircraft Maintenance Planning in an EASA Environment
- Part M Effective Mar 2020 - For Large Aircraft with VO
- Aircraft Technical Records
- EASA Part 21 Review for CAMO Staff
- Developing an Effective Reliability Program Essentials
- Introduction to Master Minimum Equipment List (MMEL) and Minimum Equipment List (MEL)
- Engine Condition Trend Monitoring
- RVSM Operations, Continued Airworthiness & Maintenance Practices with VO

- EASA Part CAMO Regulatory Obligations with VO
- EASA Part CAMO - SMS - Regulatory Obligations with VO
- AD, SB & Repair Considerations for EASA CAMO

And if this was not enough, we have developed additional courses at customer request including the following which forms part of our advanced CAMO Diploma – see here

<https://www.sofemaonline.com/lms/all-courses/494-camo-learning-path-advanced-diploma/preview>

All of these course are available as part of our Advanced CAMO Diploma

- Part M Subpart I for Airworthiness Review Staff (Initial)
- CAMO & AMO Planning & Tech Services - Job Card & Technical Authoring
- EASA Part M - Understanding MSG 3 Methodology and Analytic Process Essentials
- AMC 20-20 Continuing Structural Integrity Programme with VO
- EASA Part 26/CS 26 Regulatory Training for Large Aeroplanes Additional Airworthiness Specifications
- FAA & EASA Supplemental Type Certificates (STC) training
- Certification Specification 25 (CS 25) Introduction for CAMO Staff
- Managing Aircraft Lease Agreements and Maintenance Reserves
- Aircraft Technical Records Specialist Lease Management for CAMO & TR Staff
- Managing EASA Maintenance Check Flight (MCF) and Permit to Fly (PtF) Requirements PtF) Requirements

A total of 25 Courses and a significant amount of work – however it is fair to say that the vast majority of European CAMO Managers have this level of knowledge (under their belt)

Take Aways – CAMO Approval

The First take away is that it is important not to lose sight of the required level of knowledge supporting competence when engaging with CAMO Approval

The second one which of course applies to all approvals is the need to establish that the approval will eventually be self-funding - Is it financially feasible – Here you need a spread sheet of the costs if you cannot show under reasonable conditions that you will be able to break even in 2 to 3 years and be profitable after 4 to 5 year, there should be a strong rationale for doing so.

Project Outcome - At a certain the point the client withdrew with the comment that the European System is different and far more complicated – It is in Europe we do not have DAR's and DER's and EASA expects that each and every organisation has competent manpower and the ability to ensure compliance with all regulatory obligations – without the level of oversight enjoyed within the FAA system.

4/ I Want a Maintenance Control Centre (MCC) So we can co-ordinate activities across our business processes

This company requested the involvement of Sofema to establish an MCC – Such a task is 100% within the remit of Sofema and one where we can easily add value to assist the organisation to optimize relevant process and procedures

See an example of the training we offer in support of this task
- <https://sofemaonline.com/lms/all-courses/457-maintenance-control-and-defects-package/preview>

Here the challenge what the company wanted was a quotation for an offer to deliver a fully functioning MCC

As was carefully explained such an option is not possible - why?

- Because The Maintenance Control Centre (MCC) contains (or should contain) a core group of key staff
- Competent and knowledgeable related to the company systems, processes and defect investigation and reliability best practices.

To achieve a project with a successful outcome requires ownership – and the comment was that Sofema will support you 100% but you need to “own it” as at a certain point we walk away and you are still standing – so please advise who is your project owner (such person ultimately to be the Maintenance Control Centre Manager) – the answer was the Quality Manager will be assigned to manage the project.

From our perspective the project was rapidly failing with a lack of commitment and ownership.

Without a defined ownership process it was not possible to even quote for such a project –

One of our business attributes which makes Sofema unique is we are not hungry for cash

- We want to involve in successful projects

- However, this requires organisational engagement, ownership and involvement
- We know that when we walk away at the end of the project you are still there and need to have the appropriate level of competence to manage the project.

Outcome - Sofema declined to provide an offer as the project was not ever going to succeed without ownership and commitment by the client

Fully 1 year later the client had still not achieved its objective of creating a stand alone MCC and placed several persons on our online training

In reality, with Ownership, Funding, Commitment and a viable timeline most if not all such projects are achievable – The strength of Sofema is to support you with Experience, Knowledge, Best Practice – Facilitation related to organisational optimisation – As mentioned earlier we will hold your hand but not take you by the hand.

Next Steps – Please see www.sassofia.com or email team@sassofia.com

<https://sassofia.com/consultancy-support-provided-by-sofema-aviation-services/>
<https://sassofia.com/support-for-easa-145-and-foreign-approval-holders/>
<https://sassofia.com/our-services/aviation-safety-management-system-support-for-your-business/>