Sofema Aviation Services – Module 10 Training for EASA Compliant 3rd Country 145 Support Document for Independent Certifying Staff (10.4) – Applicant version 1

How do you demonstrate - that the content of Module 10 - 10.4 (Independent Certifying Staff) is equivalent to LEVEL III training requirements?

In respect of Part 66 Module 10 - 10.4 (Independent Certifying Staff) - Sofema provides a read and review document together with a questionnaire - The questionnaire should be completed and presented to your Compliance Manager - the document is available [here](#) (EASA 145 Third Country Regulatory Support)

Sofema Aviation Services (SAS) www.sassofia.com provides specific support to enable the demonstration of the appropriate level of Knowledge related to the provision of Part 66 Module 10 training via Sofema Online (www.sofemaonline.com)

Under the EASA system, it is the responsibility of the organisation to ensure that any training is compliant not just with EASA regulations but also with the internal competence management and oversight requirements of the Organisation.

Additional Note Regarding Sofema Online training courses

All SOL courses are based on material provided by Sofema Aviation Services (SAS) www.sassofia.com and are designed to be fully compliant with the regulations.

- **However please note it is for the receiving organisation to ensure that the material meets your needs.**

To support this obligation, we provide guests access to Regulatory Authorities, Nominated Compliance & Quality Managers to Audit & Assess Sofema Online Training Material.

Introduction

The 145 organisation is responsible to determine the competence of persons suitable to receive approval to provide certification under EASA Part 145 Conditions.

In respect of EASA Third Country Part 145 Organisation this includes the completion of Part 66 Module 9 – HF and Part 66 Module 10 – Legislation Training

The Role and Purpose of this Support Document

- This document is to support 1 single objective to support the EASA Part 145 organisation to determine the acceptability of the applicant in respect of level III knowledge demonstration of Part 66 Module 10 subpart 10.4

Basic Knowledge Requirements (Appendix I)

1. Knowledge levels for Category A, B1, B2, B2L, B3 and C aircraft maintenance licences Regulation (EU) 2018/1142

Basic knowledge for categories A, B1, B2, B2L and B3 is indicated by knowledge levels (1, 2 or 3) of each applicable subject. Category C applicants shall meet either the category B1 or the category B2 basic knowledge levels.

The knowledge level indicators are defined on 3 levels as follows:

– LEVEL 1: A familiarisation with the principal elements of the subject.

Objectives:

(a) The applicant should be familiar with the basic elements of the subject.

(b) The applicant should be able to give a simple description of the whole subject, using common words and examples.

(c) The applicant should be able to use typical terms.

– LEVEL 2: A general knowledge of the theoretical and practical aspects of the subject and an ability to apply that knowledge.

Objectives:

(a) The applicant should be able to understand the theoretical fundamentals of the subject.

(b) The applicant should be able to give a general description of the subject using, as appropriate, typical examples.

(c) The applicant should be able to use mathematical formulae in conjunction with physical laws describing the subject.

(d) The applicant should be able to read and understand sketches, drawings and schematics describing the subject.

(e) The applicant should be able to apply his knowledge in a practical manner using detailed procedures.

– LEVEL 3: A detailed knowledge of the theoretical and practical aspects of the subject and a capacity to combine and apply the separate elements of knowledge in a logical and comprehensive manner.

Objectives:

(a) The applicant should know the theory of the subject and interrelationships with other subjects.

(b) The applicant should be able to give a detailed description of the subject using theoretical fundamentals and specific examples.

(c) The applicant should understand and be able to use mathematical formulae related to the subject.

(d) The applicant should be able to read, understand and prepare sketches, simple drawings and schematics describing the subject.

(e) The applicant should be able to apply his knowledge in a practical manner using manufacturer's instructions.

(f) The applicant should be able to interpret results from various sources and measurements and apply corrective action where appropriate.

MODULE 10. AVIATION LEGISLATION (Appendix I to Part-66)

Regulation (EU) 2023/989

MODULE 10. AVIATION LEGISLATION	LEVEL	
	A	B1 B2 B2L B3
10.1 Regulatory framework	1	1
10.2 Certifying Staff — maintenance	2	2
10.3 Approved maintenance organisations	2	2
10.4 Independent certifying staff	—	3
10.5 Air operations	1	1
10.6 Certification of aircraft, parts, and appliances	2	2
10.7 Continuing airworthiness	2	2
10.8 Oversight principles in continuing airworthiness	1	1
10.9 Maintenance and certification beyond the current EU regulations (if not superseded by EU requirements)	—	1
10.10 Cybersecurity in aviation maintenance	1	1

Read and Review the following Information

Based on the "Easy Access Rules for Continuing Airworthiness" provided in the uploaded document, here is a detailed discussion regarding **Independent Certifying Staff** in the context of EASA Part-M, Part-66, and Part-ML, adhering to the objectives of Level 3 competence:

General Overview of required Elements

A) Privileges

1. Scope of Authorization:

   o Independent certifying staff are permitted to certify aircraft or components for return to service following maintenance within the scope of their authorizations, as defined by their licensing and training.

   o They may operate under the provisions of Part-M and Part-ML, specifically for tasks such as airworthiness reviews and direct maintenance certifications.

2. Exceptional Circumstances:

   o In unforeseen situations, such as when an aircraft is grounded away from the main base, independent certifying staff may issue one-off certifications, provided they meet specific qualification and authorization requirements.

3. Limitations:

   o Their privileges are limited by their training, experience, and the conditions of their certifications (e.g., type-specific limitations or tasks they are specifically authorized to perform).

B) Responsibilities

1. Compliance and Standards:

   o Certifying staff must ensure that all maintenance activities meet the applicable standards and are completed according to approved procedures and data (e.g., maintenance manuals).

2. Reporting and Communication:

- o They are required to report any non-conformance or maintenance issues affecting airworthiness to the competent authority within specified timelines
  .

3. Professional Integrity:

- o Certifying staff must maintain high professional integrity, ensuring accurate documentation and clear communication regarding maintenance actions.

C) Record-Keeping

1. Maintenance Records:

- o Certifying staff must ensure detailed maintenance records are kept, covering all tasks performed and the use of approved data. This supports traceability and compliance.

- o Records must include details of certifications issued and any limitations applicable to those certifications.

2. Retention Periods:

- o Maintenance records must be retained for a minimum period, as defined by regulations (e.g., until 2 years after the aircraft is permanently withdrawn from service for Part-ML).

D) Limitations

1. Training and Experience-Based:

- o Staff can only certify maintenance tasks they are trained and authorized for, with restrictions applied based on the scope of their qualifications under Part-66.

2. Type-Specific Authorizations:

- o Certifications are often type-specific and aligned with the individual's Part-66 license categories and subcategories.

3. One-off Authorizations:

- Special authorizations for unforeseen situations are limited in scope and duration and require immediate oversight and reporting to the competent authority.

E) Oversight

1. Regulatory Compliance:

   - Independent certifying staff operate under the oversight of competent authorities, ensuring adherence to regulations and corrective actions for non-compliance.

2. Performance Monitoring:

   - Competent authorities conduct periodic audits and reviews to verify that certifying staff maintain competence, adhere to standards, and follow procedures.

3. Continuing Training:

   - Certifying staff must participate in recurrent training programs to stay updated on regulatory changes and technical advancements.

Level 3 Competence Objectives

- Interrelationships: Staff should understand the interplay between Part-M, Part-66, and Part-ML and their respective impacts on maintenance certifications and airworthiness management.

- Detailed Knowledge: They should describe theoretical and practical aspects of their work, supported by real-world examples such as airworthiness reviews or type-specific maintenance.

- Mathematical Application: Staff should calculate and apply parameters for tasks such as performance evaluations or maintenance planning.

- Technical Drawings: They should interpret and produce schematics related to maintenance tasks.

- Practical Application: Knowledge must be applied in alignment with manufacturer instructions and approved maintenance data.

- Corrective Actions: Ability to evaluate findings, determine implications, and implement corrective actions effectively

Detailed Review

A) Privileges regarding Independent Certifying Staff in the context of EASA regulations, particularly Part-M, Part-66, and Part-ML:

1. Scope of Authorization

Definition of Authorization:

- Independent certifying staff are licensed individuals who meet the requirements of **EASA Part-66**, ensuring they possess the necessary qualifications, experience, and training to certify aircraft or components for return to service following maintenance.

- The scope of their authorization is defined within the framework of their **Part-66 license** and any additional authorizations issued by the organization they work for (e.g., through Maintenance Organization Expositions under Part-145).

Certifications Issued:

- Certifying staff are empowered to issue **Certificates of Release to Service (CRS)** after performing or supervising maintenance activities. This includes:

  - **Base Maintenance**: Conducted at a facility and typically involving heavy maintenance checks.

  - **Line Maintenance**: Performed at operational locations and often involving more immediate and routine tasks such as troubleshooting or minor repairs.

Integration with Part-M and Part-ML:

- **Part-M** focuses on the continuing airworthiness management for large aircraft and complex motor-powered aircraft. Independent certifying staff play a critical role in:

  - Certifying the airworthiness of these aircraft post-maintenance.

  - Conducting or assisting with airworthiness reviews

- **Part-ML** is specific to simpler, non-complex aircraft (e.g., light aircraft). Here, certifying staff may undertake certifications for privately operated aircraft or simpler maintenance tasks aligned with **ML.A.801**.

Special Provisions for Maintenance Certifications:

- Certifying staff may also handle the certification of components under **M.A.613** and **ML.A.802**, ensuring compliance with EASA Form 1 requirements for components returned to service.

2. Exceptional Circumstances

Definition of Exceptional Circumstances:

- Unforeseen situations may arise when an aircraft is grounded at a location without full maintenance facilities (e.g., a remote airport or during transit operations). These situations demand flexibility in certification procedures.

Issuing One-Off Certifications:

- In such cases, independent certifying staff may be permitted to issue **one-off certifications**, provided:
  - The maintenance task is within the staff member's **license privileges** and does not exceed their **type rating authorizations**.
  - The staff meets the qualification requirements defined under **Part-66.A.20** and **AMC/GM to Part-M** or **Part-ML** for unforeseen certifications.

Authority Approval:

- To ensure compliance, these one-off authorizations typically require:
  - Notification and/or approval from the competent authority or the organization's Quality Assurance team.
  - Documentation justifying the necessity, along with records of the performed maintenance.

Examples of Exceptional Certifications:

- Situations like repairing minor damage to an aircraft during a stopover or replacing a critical component to restore airworthiness for a return flight.

- Certifying modifications under **approved repair schemes** when standard maintenance cannot be performed due to operational constraints.

Limitations

Factors Influencing Limitations:

- The privileges of independent certifying staff are inherently **bounded by their qualifications**, **training**, and **experience**. These limitations ensure safety and compliance with EASA's high standards for airworthiness.

Training and Experience:

- Certifying staff may only perform tasks for which they have been specifically trained and authorized. This is reflected in their **Part-66 license categories**:

  o Categories **A, B1, B2, B3, and C**, each defining specific privileges related to aircraft systems and components.

  o For example, a Category B1 engineer can certify mechanical systems but not avionics unless also holding a B2 qualification.

Type-Specific Authorizations:

- Type ratings included on a certifying staff's license further limit their scope. These ratings are:

  o Aircraft-specific (e.g., Airbus A320, Boeing 737).

  o Granted following approved type-training courses and practical experience assessments.

Organizational Constraints:

- Maintenance organizations often impose additional restrictions to ensure oversight and control, such as:

  o Limiting the scope of certifying privileges within their **Maintenance Organization Exposition (MOE)**.

  o Requiring adherence to the organization's procedures and compliance monitoring processes.

Task-Specific Limitations:

- Certain tasks, such as **complex maintenance procedures** (e.g., structural repairs or significant system overhauls), may require the involvement of multiple certifying staff or additional approvals.

Examples of Limitations:

- A Category A license holder can only certify tasks they have performed themselves, primarily involving line maintenance.

- Staff may be restricted from certifying modifications not supported by manufacturer-approved data unless under exceptional provisions with oversight.

Privileges Summary

These detailed provisions for **Privileges** ensure that independent certifying staff operate within their expertise and authority, safeguarding compliance with EASA regulations while maintaining aircraft airworthiness. Their role is critical in balancing operational flexibility (e.g., through exceptional certifications) with stringent safety standards (e.g., through defined limitations). This systematic approach underpins the robust framework of European aviation safety.

B) Responsibilities

1. **Compliance and Standards**:

   o Certifying staff must ensure that all maintenance activities meet the applicable standards and are completed according to approved procedures and data (e.g., maintenance manuals).

2. **Reporting and Communication**:

   o They are required to report any non-conformance or maintenance issues affecting airworthiness to the competent authority within specified timelines .

3. **Professional Integrity**:

   o Certifying staff must maintain high professional integrity, ensuring accurate documentation and clear communication regarding maintenance actions.

1. Compliance and Standards

Adherence to Regulations and Procedures:

- Certifying staff must ensure all maintenance tasks are performed in accordance with:

  - **EASA Part-M, Part-145, Part-66, and Part-ML** requirements.

  - Manufacturer's approved **maintenance manuals**, **repair instructions**, and any other relevant documentation, such as **service bulletins** and **airworthiness directives** (ADs).

  - Organizational procedures detailed in the **Maintenance Organization Exposition (MOE)** or other approved manuals.

Ensuring Airworthiness:

- Certifying staff are directly responsible for confirming that:

  - Maintenance tasks are performed to restore or maintain the aircraft's compliance with its **type certificate (TC)** and any applicable modifications.

  - Approved tools, equipment, and materials are used, as defined in **M.A.401** and **ML.A.401**.

Verification and Double-Checks:

- Certifying staff are often required to perform or oversee inspections, functional tests, and other verification tasks to ensure maintenance quality.

  - For example, post-maintenance checks of systems like avionics or flight controls are mandatory before certifying the aircraft for return to service.

Accountability for Certification:

- When issuing a **Certificate of Release to Service (CRS)** under **M.A.801**, certifying staff confirm:

  - All tasks in the work order are completed satisfactorily.

  - No outstanding defects or deferred maintenance tasks compromise the aircraft's safety or airworthiness.

Reporting and Communication

Mandatory Reporting of Non-Conformances:

- Certifying staff are obligated to report issues that may affect airworthiness, including:

    o Maintenance errors or deviations from approved procedures.

    o Safety-related occurrences, defects, or failures discovered during inspections or operations.

Regulatory Timelines:

- Reporting timelines are defined under **Part-M.A.202** and **ML.A.202**, requiring staff to:

    o Notify their organization or the competent authority within 72 hours of discovering any condition that could affect airworthiness or safety.

    o For serious occurrences, immediate reporting is often required.

Tools for Reporting:

- Certifying staff typically use structured formats like:

    o **Occurrence Reports** or **Service Difficulty Reports** as outlined in the organization's quality and safety management system.

    o Electronic reporting systems integrated with aviation databases such as the **European Coordination Centre for Accident and Incident Reporting Systems (ECCAIRS)**.

Coordination with Stakeholders:

- Certifying staff act as a bridge between maintenance organizations, operators, and competent authorities, ensuring clear and accurate communication of maintenance actions and airworthiness concerns.

    o For instance, staff may need to liaise with the design organization regarding repair schemes or technical support.

Professional Integrity

Accuracy and Honesty:

- Certifying staff must ensure that all maintenance actions, findings, and certifications are accurately documented. This includes:

- o   Precise details in work orders, inspection records, and logbooks.

- o   Clear documentation of parts used, discrepancies resolved, and methods employed.

Avoiding Misrepresentation:

- Staff must not falsely certify work or sign off on tasks beyond their scope of expertise or authorization under **Part-66.A.20**.

Ethical Practices:

- Maintaining integrity involves adhering to ethical practices such as:

  - o   Avoiding shortcuts or deviations from approved procedures to save time or reduce costs.

  - o   Reporting errors or unsafe practices, even if it reflects poorly on the organization.

Continuous Professional Development:

- Professional integrity also extends to staying updated on:

  - o   Regulatory changes and industry best practices through recurrent training as required under **Part-66.A.45**.

  - o   Technical advancements, ensuring the highest standards of maintenance and safety.

Promoting a Safety Culture:

- Certifying staff play a crucial role in fostering a culture of safety within their organization, emphasizing transparency, accountability, and proactive risk management.

Conclusion

The responsibilities of certifying staff encompass more than technical expertise—they are the linchpin of compliance, communication, and ethical maintenance practices in aviation. By adhering to strict standards, reporting non-conformances effectively, and upholding professional integrity, certifying staff ensure the highest levels of safety and airworthiness within the aviation industry. This framework not only aligns with regulatory

requirements but also strengthens trust among stakeholders and supports a robust aviation safety culture.

C) Record-Keeping

1. **Maintenance Records**:

   o Certifying staff must ensure detailed maintenance records are kept, covering all tasks performed and the use of approved data. This supports traceability and compliance.

   o Records must include details of certifications issued and any limitations applicable to those certifications.

2. **Retention Periods**:

   o Maintenance records must be retained for a minimum period, as defined by regulations (e.g., until 2 years after the aircraft is permanently withdrawn from service for Part-ML).

Detailed Review of Record-Keeping Responsibilities for Independent Certifying Staff

1. Maintenance Records

Purpose and Importance:

- Maintenance records are critical to aviation safety and regulatory compliance. They ensure **traceability**, **transparency**, and **continuity** in maintaining airworthiness. These records document:

  o **Tasks performed**: The nature, scope, and details of each maintenance action.

  o **Data used**: Reference to **approved maintenance data**, such as maintenance manuals, airworthiness directives (ADs), and service bulletins.

Requirements for Certifying Staff:

- Certifying staff are responsible for ensuring that maintenance records are accurate, complete, and detailed. This includes:

  o **Description of Work Performed**:

- Comprehensive descriptions of maintenance actions, inspections, tests, and rectifications.

- Any deviations or variations from standard procedures must be documented and justified.

- **Certification Details**:

  - A clear record of the **Certificate of Release to Service (CRS)** issued, including:

    - Reference to the tasks certified.

    - The certifying staff's name, license number, and signature or digital equivalent.

  - Any **limitations or conditions** attached to the certification, such as partial sign-offs or deferred maintenance.

- **Parts and Components**:

  - Details of parts and materials used, including part numbers, serial numbers, batch numbers, and sources.

  - Information on compliance with **Part-M.A.501** and **Part-ML.A.501** regarding component classification and serviceability.

Traceability:

- Each record must allow stakeholders (e.g., operators, regulators, maintenance organizations) to trace:

  - The individual certifying the work.

  - The source of data and materials used.

  - The timeline of actions performed.

Examples of Maintenance Records:

- Aircraft technical logs.

- Component history records, such as life-limited parts tracking.

- Airworthiness review certificates and related documentation.

2. Retention Periods

Regulatory Basis:

- Maintenance records must be retained in compliance with the applicable regulatory requirements to support airworthiness monitoring and investigations. These regulations include:

  - **M.A.305** for continuing airworthiness records.

  - **ML.A.305** for aircraft under Part-ML.

  - **Part-145.A.55** for maintenance organizations.

Minimum Retention Periods:

- Under **Part-M** and **Part-ML**, the retention periods for maintenance records are:

  - **Part-M.A.305(f)**: Maintenance records must be retained until at least **2 years** after the aircraft or component has been permanently withdrawn from service.

  - **Part-ML.A.305(d)**: Similar retention applies to non-complex aircraft covered under Part-ML.

- For components, retention periods may extend to the **lifetime of the component**, particularly for **life-limited parts**.

Practical Considerations:

- Maintenance organizations and operators must implement record-keeping systems (paper or electronic) that ensure secure and retrievable storage throughout the retention period.

- Certifying staff play a crucial role in ensuring proper entry, verification, and transfer of records to these systems.

Legal and Investigative Needs:

- Records may be required for audits by competent authorities, investigations into accidents or incidents, or operator and lessor reviews. Certifying staff must ensure that the records are legible, organized, and readily accessible.

Examples of Retention Scenarios:

- Records for a component installed on multiple aircraft must reflect its history across all installations.

- When an aircraft changes ownership or is deregistered, the maintenance records must accompany the transfer.

Summary

Proper record-keeping is a cornerstone of aviation safety and compliance, ensuring the airworthiness of aircraft and components over time. Certifying staff must:

1. **Maintain accurate, comprehensive, and detailed records** that provide a clear and traceable history of maintenance actions.

2. **Adhere to retention requirements** that span the operational life of the aircraft or component, extending beyond its withdrawal from service.

This responsibility underscores the importance of professional diligence and organizational systems to meet stringent regulatory standards. Through robust record-keeping practices, certifying staff help safeguard the integrity of the aviation maintenance system.

Limitations

1. **Training and Experience-Based**:

   o Staff can only certify maintenance tasks they are trained and authorized for, with restrictions applied based on the scope of their qualifications under Part-66.

2. **Type-Specific Authorizations**:

   o Certifications are often type-specific and aligned with the individual's Part-66 license categories and subcategories.

3. **One-off Authorizations**:

   o Special authorizations for unforeseen situations are limited in scope and duration and require immediate oversight and reporting to the competent authority.

Oversight

1. **Regulatory Compliance**:

- o Independent certifying staff operate under the oversight of competent authorities, ensuring adherence to regulations and corrective actions for non-compliance.

2. **Performance Monitoring**:

- o Competent authorities conduct periodic audits and reviews to verify that certifying staff maintain competence, adhere to standards, and follow procedures.

3. **Continuing Training**:

- o Certifying staff must participate in recurrent training programs to stay updated on regulatory changes and technical advancements.

D) Limitations for Independent Certifying Staff

1. Training and Experience-Based Limitations

Certifying staff are bound by their qualifications and experience, as outlined in **EASA Part-66**. These limitations ensure that only competent individuals perform maintenance tasks to safeguard aviation safety.

Scope of Qualifications:

- **Part-66 License Categories**:

  - o **Category A**: Limited to certifying minor line maintenance tasks and simple defect rectification. This category is further restricted to tasks performed personally by the certifying staff.

  - o **Category B1**: Authorizes maintenance certification for mechanical systems (e.g., airframe, engines, fuel systems) and certain electrical tasks.

  - o **Category B2**: Covers certification of avionics systems (e.g., navigation, communication, and automatic flight control systems).

  - o **Category B3**: Applies to non-complex aircraft.

  - o **Category C**: Authorizes base maintenance certifications, primarily overseeing the work performed by other certifying staff.

- Staff may only certify within their licensed category unless additional qualifications are obtained.

Experience Requirements:

- Part-66 specifies experience requirements in **66.A.30**:
  - Certifying staff must demonstrate practical experience with tasks related to the scope of their certification.
  - The depth of experience must align with the **complexity** of the aircraft or components they certify.

Limitations in Practical Application:

- A **Category A license holder** cannot certify major repairs or system tests beyond their personal competency.
- A **B1 license holder** cannot certify avionics tasks unless holding a combined B1/B2 qualification.

2. Type-Specific Authorizations

Certifying staff may only perform certifications for specific aircraft types included in their licenses. These type-specific authorizations ensure proficiency with the unique requirements of individual aircraft models.

Type Ratings:

- Type ratings are issued following **type training programs** approved by EASA. These include:
  - **Theoretical Training**: Comprehensive understanding of aircraft systems, structures, and limitations.
  - **Practical Training**: Hands-on experience with the specific aircraft type, covering maintenance tasks and procedures.
- Type ratings are listed in the certifying staff's license as evidence of their qualification.

Limitations by Aircraft Complexity:

- Type ratings are aligned with the **aircraft group**:

- o **Group 1**: Large aircraft and complex motor-powered aircraft.

- o **Group 2 and 3**: General aviation and non-complex aircraft.

Category-Specific Type Ratings:

- A **B1 license holder** with a type rating for a Boeing 737 cannot certify avionics tasks unless they also hold a B2 rating for the same type.

- A **Category C engineer** can certify base maintenance on an Airbus A320 but is not authorized to perform detailed tasks such as troubleshooting hydraulic systems unless holding a B1 rating for the same type.

3. One-Off Authorizations

One-off authorizations provide flexibility for unforeseen circumstances but are subject to strict limitations to ensure safety and compliance.

Scope and Application:

- These authorizations allow certifying staff to issue **Certificates of Release to Service (CRS)** for tasks outside their standard approval in emergencies or operational contingencies.

- They are typically used in situations such as:

  - o Aircraft stranded at remote locations without access to licensed certifying staff.

  - o Urgent repairs requiring immediate action to restore airworthiness.

Limitations on One-Off Certifications:

- **Specificity**: The authorization is limited to the exact task required for the unforeseen situation.

- **Temporary Nature**: These certifications are valid only for the duration of the specific need and cannot be extended beyond the original scope.

- **Competency Check**: Certifying staff must demonstrate competency for the task before receiving authorization.

Oversight and Reporting:

- **Organizational Oversight**:

    - Maintenance organizations must approve one-off authorizations in accordance with their **Maintenance Organization Exposition (MOE)**.

    - A designated Quality Manager or Accountable Manager is typically responsible for granting such authorizations.

- **Competent Authority Reporting**:

    - Organizations must notify the competent authority about one-off authorizations, providing justification and details of the task.

    - Reporting ensures regulatory oversight and supports audits or investigations, if necessary.

Documentation Requirements:

- Detailed records of the authorization, task performed, and certification issued must be maintained.

- The documentation must include:

    - The specific conditions under which the one-off authorization was issued.

    - Evidence of compliance with regulatory requirements.

Summary

The limitations for independent certifying staff ensure that certifications are performed by competent individuals operating within their qualifications and experience. These limitations are categorized as follows:

1. **Training and Experience-Based**:

    - Scope defined by license categories and qualifications.

2. **Type-Specific Authorizations**:

    - Certifications tied to aircraft type ratings based on comprehensive training and experience.

3. **One-Off Authorizations**:

- o Temporary and specific to unforeseen situations, requiring immediate organizational and regulatory oversight.

By adhering to these limitations, EASA ensures that certifying staff operate safely, competently, and consistently, preserving the integrity of the aviation maintenance system.

E) Independent Certifying Staff

Oversight is a crucial component of ensuring that independent certifying staff maintain the highest standards of safety, competence, and regulatory compliance in the aviation industry. The following aspects elaborate on the key elements of oversight.

1. Regulatory Compliance

Role of Competent Authorities:

- **Oversight Responsibility**: Competent authorities (e.g., EASA or national aviation authorities) are tasked with monitoring the activities of certifying staff to ensure compliance with relevant regulations, such as **Part-M**, **Part-145**, **Part-66**, and **Part-ML**.

- **Certification and Licensing**: The issuance, validation, and renewal of Part-66 licenses fall under the purview of these authorities, ensuring that only qualified individuals are authorized to certify maintenance.

Corrective Actions:

- In cases of non-compliance or breaches of regulatory requirements, authorities may:
  - o Suspend or revoke Part-66 licenses.
  - o Impose penalties or additional requirements for corrective training.
  - o Mandate reviews or revisions of procedures within maintenance organizations.

Compliance Checks:

- Authorities verify compliance through:
  - o **Audits**: Ensuring maintenance records, certifications, and procedures align with approved practices.

- o **On-Site Inspections**: Direct evaluation of maintenance tasks and certification processes.

Coordination with Maintenance Organizations:

- Competent authorities often work closely with maintenance organizations to ensure that oversight of certifying staff is integrated into the organization's internal quality assurance system.

2. Performance Monitoring

Periodic Audits and Reviews:

- **Frequency of Audits**:

  - o Audits are conducted periodically, often annually or biennially, depending on the risk profile of the individual or organization.

- **Scope of Audits**:

  - o Verification of individual competencies, including adherence to the scope of their license and authorizations.

  - o Review of maintenance records and certificates of release to service (CRS) for accuracy and compliance.

  - o Evaluation of adherence to approved procedures, such as those in the **Maintenance Organization Exposition (MOE)** or airworthiness review procedures under **M.A.710**.

Competence Assessment:

- Authorities monitor certifying staff to ensure:

  - o Technical skills and knowledge remain up-to-date.

  - o Certification processes are performed accurately and in compliance with the latest standards.

  - o Any identified performance gaps are addressed through training or corrective measures.

Feedback and Reporting:

- Findings from audits and reviews are reported to:
  - The certifying staff, detailing areas of compliance and non-compliance.
  - The organization's quality management system for further action.
- Performance issues may trigger focused or follow-up audits.

3. Continuing Training

Mandatory Recurrent Training:

- Certifying staff must participate in recurrent training to maintain their **Part-66 license validity** and stay updated on regulatory changes, technical advancements, and procedural updates.

Scope of Training:

- **Regulatory Updates**: Training includes changes in EASA regulations, AMC/GM updates, and national authority requirements.
- **Technical Advancements**:
  - New maintenance techniques, tools, and equipment.
  - Updates related to emerging technologies, such as digital maintenance records or predictive maintenance systems.
- **Human Factors and Safety Management**:
  - Training in areas such as human performance, safety culture, and error management, ensuring alignment with safety management systems (SMS).
  - Awareness of organizational safety policies and how they integrate with individual responsibilities.

Frequency and Methods:

- Recurrent training is typically conducted every **2 years**, depending on the complexity of the staff's scope of work and regulatory requirements.
- Training methods include:
  - **Classroom Training**: Focused on regulatory and procedural updates.

- On-the-Job Training (OJT): Hands-on tasks with supervision to reinforce practical skills.

- E-Learning and Multimedia: Accessible training programs for remote or continuous learning.

Assessment and Certification:

- Certifying staff must pass assessments at the end of training programs to demonstrate their understanding and ability to apply the learned knowledge.

- Training records are retained as part of the staff's licensing and authorization history, reviewed during audits by competent authorities.

Conclusion

Oversight of independent certifying staff is a multi-faceted process involving regulatory compliance, performance monitoring, and continuing training. By maintaining strict oversight:

1. **Regulatory Compliance** ensures adherence to aviation safety standards and procedures, with corrective actions for any deviations.

2. **Performance Monitoring** verifies the ongoing competence and accountability of certifying staff, safeguarding the quality of maintenance and certifications.

3. **Continuing Training** equips certifying staff with the latest knowledge and skills to adapt to evolving regulations and technological advancements.

This robust oversight framework upholds the integrity of aviation maintenance systems, ensuring the safety and reliability of aircraft operations.

When you have completed the document review complete the following Multichoice Questionnaire

Independent Certifying Staff (ICS) – Multi-Choice Examination

Section A: Regulatory Framework

1. What is the minimum retention period for maintenance records under Part-ML?

- o   A. 1 year
- o   B. 5 years
- o   C. 2 years after aircraft withdrawal

2. Which EASA regulation covers continuing airworthiness management for large aircraft?

- o   A. Part-ML
- o   B. Part-M
- o   C. Part-145

Section B: Privileges and Responsibilities

3. What is the primary responsibility of certifying staff?

- o   A. Auditing airworthiness authorities
- o   B. Ensuring compliance with maintenance standards
- o   C. Supervising flight operations

4. Certifying staff must report maintenance issues within what timeframe?

- o   A. 24 hours
- o   B. 48 hours
- o   C. 72 hours

5. Maintenance tasks must comply with:

- o   A. Manufacturer's guidelines and EASA regulations
- o   B. The airline's operational policies
- o   C. Local aviation authority instructions

Section C: Knowledge Levels

6. Level 1 knowledge involves:

- A. Detailed technical understanding

- B. General theoretical application

- C. Familiarization with basic elements

7. Level 3 knowledge is required for:

- A. Independent certifying staff

- B. Administrative staff

- C. Line maintenance engineers

8. At Level 3 knowledge, staff should:

- A. Understand basic procedures

- B. Provide a simple description of systems

- C. Combine and apply knowledge comprehensively

9. Which document supports compliance with EASA standards for Independent Certifying Staff?

- A.EASA Form 1

- B. Maintenance Organization Exposition

- C. Type Certificate Data Sheet

10. Theoretical fundamentals and practical application are associated with:

- A. Level 1 knowledge

- B. Level 2 knowledge

- C. Level 3 knowledge

Section D: Limitations

11. Certifying staff cannot perform tasks unless:

- o A. They are supervised by the organization

- o B. They are trained and authorized

- o C. They have completed at least 5 years of service

12. One-off authorizations are limited to:

- o A. Base maintenance tasks

- o B. Routine certifications

- o C. Specific unforeseen situations

13. Type-specific authorizations are granted after:

- o A. General aviation training

- o B. Type training and practical experience

- o C. Employer approval

14. Maintenance organizations impose additional restrictions to:

- o A. Reduce staff workload

- o B. Enhance operational flexibility

- o C. Ensure oversight and compliance

Section E: Oversight and Continuing Training

15. Competent authorities conduct audits to:

- o A. Verify compliance and performance

- o B. Review flight schedules

- o C. Approve new maintenance facilities

16. Performance reviews ensure certifying staff:

- o A. Meet minimum workload requirements

- o B. Maintain up-to-date competencies

- o   C. Follow company policies exclusively

17. Continuing training is required:

- o   A. Annually

- o   B. Every 2 years

- o   C. Every 5 years

18. Recurrent training includes:

- o   A. Management skills

- o   B. Regulatory updates and technical advancements

- o   C. Aircraft design principles

19. What role does recurrent training play for certifying staff?

- o   A. Improves personal skills

- o   B. Ensures alignment with safety regulations

- o   C. Focuses on cost-efficiency

20. Who ensures the accuracy of maintenance records?

- o   A. Quality Assurance Team

- o   B. Certifying staff

- o   C. Line managers

- o   D. Regulatory authorities