SOFEMA
AVIATION SERVICES

EASA Part 66 Certification Review, Questions & Comments

Sofema Aviation Services (SAS) reviews EASA Part 66 key issues, questions & comments

Part 66 License Privileges

A Part-66 licence never, by itself, gives you certification privileges. Those privileges are exercised only when you are authorised by an organisation (Part-145/Part-CAO) or when you act as Independent Certifying Staff (ICS) under Part-ML. This is explicit in EASA's own FAQ and in 66.A.20 (Privileges).

- **I am the holder of a B1.2 licence (i.e "aeroplane piston"). Can I exercise my privileges for piston-engine non-pressurised aeroplanes1 of 2000 kg MTOM and below (i.e. category B3)?**
  - By default, a category B3 licence is included in a category B1.2 licence because the basic knowledge requirements (66.A.25(a)) and the basic experience requirement (66.A.30) for a B3 licence are covered by the similar requirements of a B1.2 licence.
  - Provided that the qualification requirements are fulfilled, the B1.2 licence holder can release maintenance tasks performed on piston-engine non-pressurised aeroplanes of 2000 kg MTOM and below.
  - In particular the B1.2 licence holder would have to meet 66.A.20(b), which means that:
    - the applicable requirements of Part-M, Part-ML, Part-145 and/or Part-CAO will be complied; and
    - in the preceding two-year period he/she has 6 months of maintenance experience in accordance with the privileges granted by the aircraft maintenance licence or; met the provision for the issue of the appropriate privileges; and
    - he/she has the adequate competence to certify maintenance on the corresponding aircraft; and
    - he/she is able to read, write and communicate to an understandable level in the language(s) in which the technical documentation and procedures necessary to support the issue of the certificate of release to service are written.

AMC 66.A.20(b)(2) and GM 66.A.20(b)2 gives further explanations on the 6-months maintenance experience in the last 2 years, including demonstration of experience on at least one aircraft type per aircraft structure (metal, composite or wood).[1]

Note - The "≤ 2,730 kg" figure is not a generic "licence-alone" threshold. It's the weight limit used inside Part-ML's scope for light aeroplanes, which then enables ICS (and pilot-owner) options. It does not turn the licence into a stand-alone privilege.

Licence Automatic Privileges

EASA FAQ (Part-66): “Obtaining the licence does not give the certification privileges. Before granting such privileges, the maintenance organisation will have first to check the competence…” (i.e., you need an organisational authorisation).

- 66.A.20 (Privileges): Certification privileges are restricted and tied to company authorisation (e.g., reference to 145.A.35 authorisation; A- and B-category examples explicitly say the privilege is limited to work performed in the maintenance organisation which issued the authorisation).

When you can certify outside an organisation (the “limited circumstances”)

- Part-ML (ML.A.801(b)) says a CRS may be issued by (1) certifying staff on behalf of an approved organisation, (2) Independent Certifying Staff, or (3) the pilot-owner (limited tasks). That “(2)” is the path outside an organisation—but only within Part-ML scope and when you hold the appropriate Part-66 licence and any specific authority authorisation required (e.g., for ARCs).

Why “≤ 2,730 kg” is referenced

- Part-ML scope defines “light aircraft” to include aeroplanes of 2,730 kg MTOM or less (plus other categories). Inside that scope you get proportionate options—ICS and pilot-owner—for maintenance certification. That’s why people associate “2,730 kg” with “licence privileges,” but legally it’s the ML framework that enables ICS/pilot-owner, not the licence operating alone.

Pilot-owner clarification

- ML.A.803 & AMC/GM set the limited tasks a pilot-owner may perform and certify. This is separate from licence-holder privileges and does not change the rule that a Part-66 licence by itself is not a certification passport.

Correcting the exact statement you quoted

“In the European system the licence itself only conveys certification privileges in limited circumstances (private aircraft below 2,730 kg).”

- Accurate version: In the EU system, a Part-66 licence does not, by itself, confer certification privileges. Privileges are exercised (a) under organisational authorisation (Part-145/CAO) or (b) as Independent Certifying Staff within Part-ML (whose scope includes aeroplanes ≤ 2,730 kg MTOM), and (c) limited pilot-owner tasks under ML.A.803.

ELA1 Considerations

EASA uses “European Light Aircraft — ELA1” as a risk-based sub-set of small GA aircraft. In plain terms, ELA1 includes:

- Aeroplanes with MTOM ≤ 1,200 kg that are not complex motor-powered,

- Sailplanes/powered sailplanes ≤ 1,200 kg,
- Certain balloons (with volume limits).

The ELA concept was created to enable proportionate (simpler) processes for design/production changes and for continuing airworthiness. You'll see "ELA1" referenced throughout Part-21 (initial airworthiness) and in the light-GA continuing-airworthiness framework (Part-ML).

Initial airworthiness (type design & production) - Design basis (Certification Specifications)

- Most ELA1 aeroplanes are certified under CS-23 (Normal Category Aeroplanes)—now performance-based since 2017 (the old CS-VLA is effectively absorbed).
- Sailplanes/powered sailplanes use the applicable CS (e.g., CS-22), and balloons/airships use their own CS sets. (Detail depends on the product, but the "ELA1" flag triggers proportionate options in Part-21.)

Approval route (Part-21 vs. Part-21 Light)

- Classic route: **Part-21** (DOA/POA; TC/STC; minor/major changes).
- New, optional route for lower-risk GA: **Part-21 Light**, which simplifies design/production approvals for small sports/recreational aircraft (including ELA1/ELA2 scope). This sits alongside (not replacing) full Part-21.

Why ELA1 helps in Part-21

- ELA1 triggers simplified "standard changes/repairs" and leaner processes for certain mods/repairs and approvals (reflected in Part-21 policy evolution to support GA).

Continuing airworthiness for ELA1 (Part-ML + CAO)

For aircraft not on an AOC and not complex, EASA shifted from Part-M Subpart G/Part-145 only to Part-ML (Annex Vb to Reg. 1321/2014) and Part-CAO—a simpler oversight and maintenance regime scaled for light aircraft. Key points:

- Part-ML provides proportionate maintenance programme rules, defect management, and Airworthiness Review Certificate (ARC) options tailored to light GA.
- Airworthiness Reviews (ARCs) can be done by a CAMO/CAO or by Independent Certifying Staff (ICS) who hold the right licence and a specific authorisation (more below).

Who can sign the CRS (and what licence is required)?

Under **ML.A.801** the CRS for Part-ML aircraft (which includes eligible ELA1) may be issued by:

1. Certifying staff on behalf of an approved maintenance organisation (Part-145 or Part-CAO),
2. Independent Certifying Staff (ICS), or
3. the Pilot-Owner (limited tasks per ML.A.803).

In practice, that means the following licence pathways are typical for ELA1 aeroplanes:

Part-66 B-category licences

- B1.2 (Aeroplanes Piston) or B3 (piston, non-pressurised aeroplanes ≤ 2,000 kg) are the classic GA mechanical licences used to certify maintenance and sign the CRS within the limits of the licence + organisation/ICS authorisation. Avionics work requiring certification may involve B2/B2L as applicable. Legal basis: Part-66 licence categories and privileges.

Part-66 L-licence (the "Light" licence)

- EASA created Category L specifically for light GA. The relevant subcategories for ELA1 aeroplanes are:
    - L2C: composite powered sailplanes and composite ELA1 aeroplanes
    - L2: powered sailplanes and ELA1 aeroplanes (all construction types)
      (Plus L1*/L3*/L4*/L5* for sailplanes/balloons/airships.)
      These L sub-categories can be used to certify work/issue the CRS, within the licence scope and authorisation.

Independent Certifying Staff (ICS) route

- Part-ML explicitly allows ICS to issue the CRS and (with extra authorisation) to perform Airworthiness Reviews and issue ARCs for ML aircraft (including ELA1). The individual must hold an appropriate Part-66 licence (B1.2/B3/B2 or L-licence as applicable) and obtain the ML.A.901/ML.A.904 authorisation from the competent authority to perform ARCs.

Pilot-Owner maintenance

- Limited scope tasks defined by ML.A.803; the pilot-owner issues the CRS for those specific tasks only (not a general certification privilege). regulatorylibrary.caa.co.uk

    - **Reference Criteria**

    – Part-66 (Annex III to Reg. 1321/2014) defines licence categories & subcategories, including Category L and B1.2/B3.
    – Part-ML (Annex Vb to Reg. 1321/2014, as amended by Reg. (EU) 2019/1383

and subsequent ED Decisions) sets who may issue the CRS (ML.A.801), Pilot-Owner privileges (ML.A.803), and Airworthiness Reviews (ML.A.901/903/904) including ICS conditions.

Summary ICS

Independent engineer with B1.2 (or B3) or L2/L2C can maintain and sign the CRS for an ELA1 aeroplane under Part-ML, acting either as ICS or within a Part-CAO/Part-145 organisation (as authorised).

- The same engineer can—with ML.A.901/904 authorisation—carry out the Airworthiness Review and issue the ARC (Form 15c) for ML aircraft (including ELA1), independent of a CAMO/CAO.
- Owners/pilots can do a small list of tasks and sign their own CRS only within ML.A.803.

Next Steps

Sofema Aviation Services (www.sassofia.com) and Sofema Online (www.sofemaonline.com) provide Classroom, Webinar and Online EASA Regulatory Compliant and Vocational Training related to Part 147 & Part 66 Regulations – please see the websites for details or email team@sassofia.com