Guidance on Establishing a Compliant MOE under EASA Part-145

The primary document demonstrating regulatory compliance is your Maintenance Organisation Exposition (MOE).

See the following outline identifying the required documentation hierarchy, formatting standards, revision controls, and standard structure for your MOE, incorporating the latest regulatory updates.

- Regulation (EU) 2023/203 (Part-IS / Information Security Management.

Documentation Hierarchy & Format Standards

EASA allows flexibility in how you structure your documentation, provided every applicable regulatory requirement is addressed.

Hierarchy of Documentation

Your organization should structure its documentation into three distinct tiers:

Tier Level	Document Type	EASA Approval Status	Description & Usage
Tier 1	**Main MOE Document**	Direct EASA Approval required.	Core compliance manual containing basic procedures (145.A.70(a)1 to 12 & 17).
Tier 2	**Associated Procedures & List**	EASA Approved (Directly or via indirect privilege).	Customized, detailed procedures and lists (e.g., Certifying Staff List, Capability List, Subcontractor List).
Tier 3	**Work Instructions**	**No EASA Approval Required** (Internal AMO Control).	Operational day-to-day forms, storekeeper instructions, and internal task checklists.

Key Rule for Tier 2/3 Separation:

The MOE should refer to Associated Procedures/Lists (listed in MOE 1.11), but never directly cite Work Instructions.
Associated Procedures may cite Work Instructions, and Work Instructions may cite Tier 1/2 documents.

MOE Document Format & Presentation Rules

- **Language:** The official language for all documentation and formal communications with EASA is **English**. Dual-language manuals (English + local language) are permissible only with prior agreement, but the English text prevailing in all cases.

- **Format:** Electronic PDF format is preferred, though hardcopies in A4 binders with dividers are acceptable.

- **Page Header/Footer Requirements:** Every page must display the Official Company Name (as per EASA Form 3), MOE Document Title, Issue/Revision Numbers, Issue/Revision Dates, Chapter Reference, and Page Number.

- **Cover Page Details:** Must explicitly show the manual title (Part-145 Maintenance Organisation Exposition), Unique Document ID Number (e.g., AMONAME-EASA-DOC1), Company Address, Phone/Email, Copy Number, and Part-145 Approval Reference.

- **Generic Contact Information:** Use a permanent, non-personal corporate email address (e.g., quality@company.com) to maintain continuity regardless of personnel changes.

2.3 Managing Multiple Regulatory Approvals

If your organisation holds or plans to hold multiple national approvals (e.g., FAA, UK CAA, local NAA), the EASA MOE must remain strictly dedicated to EASA Part-145. However, Tier 2 Associated Procedures can be shared across multiple approvals provided EASA-specific requirements are clearly highlighted within the text (e.g., using applicability tags or callouts).

3. Recommended MOE Example Structure

To minimize inspector review time and avoid approval delays, EASA strongly advises adhering to the standardized MOE chapter and paragraph numbering structure defined in User Guide UG.CAO.00024-010. Every procedure must systematically answer: What, Who, When, Where, How, and Which Form?

MOE Document Architecture
PART 0 —— Introduction & Document Control
PART 1 —— General (Policies, Personnel, Scope, Changes)
PART 2 —— Maintenance Procedures
PART L2 —— Additional Line Maintenance Procedures
PART 3 —— Management System Procedures (SMS)
PART 3A —— Information Security Management Procedures (ISMS)
PART 4 —— Customer / Operator Interfaces
PART 5 —— Supporting Documents & Sample Forms
PART 7 —— FAA Supplementary Procedures (If applicable)

Breakdown of MOE Structure

PART 0 – Introduction

- 0.1 Table of Contents
- 0.2 List of Effective Pages (LEP)
- 0.3 Record of Revisions
- 0.4 Distribution List
- 0.5 Definitions and Abbreviations

PART 1 – General

- 1.1 **Statement by the Accountable Manager** (Must be signed by the AM/CEO confirming commitment to continuous regulatory compliance).
- 1.1.1 Access to the Organisation by Authority Inspectors
- 1.1.2 Immediate Reaction to Safety Problems & ISMS Vulnerabilities
- 1.2 Safety Policy, Information Security Policy, and Objectives (incorporating 'Just Culture' principles)
- 1.3 Management Personnel (Accountable Manager, Nominated Persons, Deputies)
- 1.4 Duties and Responsibilities of Management Personnel
- 1.5 Management Organisation Chart
- 1.6 List of Certifying Staff (C/S), Support Staff (S/S), and AR Staff
- 1.7 Manpower Resources Summary
- 1.8 Facilities Description & Hangar Layout Configurations
- 1.9 Scope of Work (Aircraft, Engine, Component, NDT, Specialised Services)
- 1.10 Procedures for Changes Requiring **Prior Approval**
- 1.11 Procedures for Changes **Not Requiring Prior Approval**
- 1.12 Alternative Means of Compliance (AltMoC) Procedures

PART 2 – Maintenance Procedures

- 2.1 Supplier Evaluation & Subcontract Control
- 2.2 Acceptance/Inspection of Components, Standard Parts & Materials
- 2.3 Storage, Tagging, Segregation & Delivery of Components
- 2.4–2.6 Tooling Control, Calibration, and Alternative Tooling Approval
- 2.7 Working Environment and Cleanliness ("FOD" Controls)
- 2.8 Maintenance Data & Work Card Transcription
- 2.9–2.12 Repairs, Scheduled Maintenance, ADs, and Modifications
- 2.13 Maintenance Documentation Development & Sign-off
- 2.14 Technical Records Control
- 2.15–2.16 Defect Rectification & Release to Service (CRS) Procedures
- 2.18 Mandatory & Voluntary Occurrence Reporting
- 2.22 Man-Hour Planning vs. Workload
- 2.23 Critical Maintenance Tasks & Error-Capturing Methods
- 2.25 Procedures to Prevent Repeated/Identical Maintenance Errors
- 2.26 Shift / Task Handover Procedures
- 2.28 Production Planning & Worksite Organisation
- 2.30 Parts Fabrication (In the course of maintenance)

PART L2 – Additional Line Maintenance Procedures

- L2.1–L2.7 Line Maintenance Control (Tech Logs, Defect Tracking, Pooled Parts, Handover)

PART 3 – Management System Procedures (SMS & Quality)

- 3.1–3.4 Hazard Identification, Risk Management, Safety Reporting & Safety KPIs

- 3.5 Safety Change Management
- 3.6 Human Factors & Safety Training Programme
- 3.8 **Compliance Monitoring System** (Audit Plan, Product Audits, Findings & Corrective Action Plans)
- 3.9–3.14 Qualification & Competency Assessment Procedures (Mechanics, Certifying Staff, Auditing Personnel)
- 3.16 Concession Control for Deviations
- 3.19 Competency Assessment Framework

PART 3A – Information Security Management Procedures (ISMS - New Integration)

(Organizations may incorporate Part-IS into Part 3A or maintain a dedicated Information Security Management Manual - ISMM):

- 3A.1 Information Security Risk Assessment
- 3A.2 Information Security Risk Treatment
- 3A.3 Internal Reporting Scheme
- 3A.4 Incident Detection, Response, and Recovery
- 3A.5 External Incident/Vulnerability Reporting Scheme
- 3A.6 Contracting Information Security Activities
- 3A.7 Personnel Trustworthiness & Qualification Requirements
- 3A.8 ISMS Record-Keeping
- 3A.9 Continuous Improvement of ISMS
- 3A.10 Confidentiality Protection

PART 4 & 5 – Customer Interfaces & Supporting Documents

- 4.1–4.2 Commercial Operator List & Customer Work Orders
- 5.1 Sample Documentation & Forms
- 5.2 List of Subcontractors (145.A.75(b))
- 5.3 List of Line Maintenance Locations (145.A.75(d))
- 5.4 List of Contracted Organisations
- 5.5 Approved Alternative Means of Compliance (AltMoC)

4. Key Document Control & Revision Rules

To maintain approval integrity, strict document control conventions must be embedded into Chapter 1.10 and 1.11 of your MOE

Proposed MOE Amendment - Does it impact core approval/SMS/ ISMS/Scope/Management/Facilities?

MOE 1.10: PRIOR APPROVAL

• Conduct Pre-Audit
• CMM Compliance Statement
• Submit EASA Form 2 to Agency
• Await Formal EASA Approval

MOE 1.11: NON-PRIOR APPROVAL

- Compliance Monitoring Review
- Internal CMM Approval
- Effective Immediately
- Notify Inspector / Update IT

Numeric Revision Conventions:

- Revisions must use numbers only (e.g., Issue 1 Revision 0, Issue 1 Revision 1) [cite: 1]. Alphabetic characters (e.g., Issue A, Rev B) are strictly prohibited due to EASA software compatibility requirements.

Track Changes Identification:

- All modified text across drafts or revisions must be visually highlighted using vertical sidebars or distinct color coding.

Draft Control During Initial Application:

- When responding to initial review remarks from EASA inspectors, keep the Issue/Rev number unchanged (e.g., Issue 1, Rev 0) but update the draft date and highlight modified text until final approval is issued.

Pre-Audit Requirement for Changes:

- Before requesting a prior approval change under MOE 1.10, the Compliance Monitoring Manager (CMM) must conduct an internal pre-audit and submit an audit report alongside a formal compliance statement.

5. Next Steps for Implementation

1. **Appoint Core Roles:** Identify key nominated persons (Accountable Manager, Safety Manager, Compliance Monitoring Manager, Information Security Manager).

2. **Draft Baseline MOE:** Develop Tier 1 MOE following the structure provided above.

3. **Establish Tier 2 Associated Procedures:** Gather specific procedural detail into an Associated Procedures Manual to streamline manual management.

4. **Perform Internal Pre-Audit:** Conduct a comprehensive internal compliance audit against EASA Part-145/Part-IS requirements before formal EASA Form 2 submission.