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ՓԱՐՏ-145 (PART-145)

ANNEX II (PART-145)

GENERAL

145.1 Competent authority

Regulation (EU) 2021/1963

For the purpose of this Annex, the competent authority shall be:

1. for organisations that have their principal place of business in a territory for which a Member State is responsible under the Convention on International Civil Aviation, signed in Chicago on 7 December 1944 (“the Chicago Convention”), the authority designated by that Member State, or by another Member State in accordance with Article 64 of Regulation (EU) 2018/1139, or the Agency if the responsibility has been reallocated to the Agency in accordance with Articles 64 or 65 of Regulation (EU) 2018/1139; or
2. for organisations that have their principal place of business outside a territory for which a Member State is responsible under the Chicago Convention, the Agency.

GM1 to Annex II (Part-145) Definitions

ED Decision 2022/011/R

For the purpose of the AMC & GM to Part-145, the following definitions are used:

Audit	refers to a systematic, independent, and documented process for obtaining evidence, and evaluating it objectively to determine the extent to which requirements are complied with. <i>Note: Audits may include inspections.</i>
Assessment	in the context of management system performance monitoring, continuous improvement and oversight, refers to a planned and documented activity performed by competent personnel to evaluate and analyse the achieved level of performance and maturity in relation to the organisation’s policy and objectives. <i>Note: An assessment focuses on desirable outcomes and the overall performance, looking at the organisation as a whole. The main objective of the assessment is to identify the strengths and weaknesses to drive continual improvement.</i> <i>Remark: For ‘risk assessment’, please refer to the definition below.</i>
Base maintenance	Ref. AMC1 145.A.10
Base maintenance hangar	refers to a closed facility that can house an aircraft and protect it from environmental conditions.
Competency	is a combination of individual skills, practical and theoretical knowledge, attitude, training, and experience.
Correction	is the action to eliminate a detected non-compliance.
Corrective action	is the action to eliminate or mitigate the root cause(s) and prevent the recurrence of an existing detected non-compliance, or other undesirable conditions or situations. Proper determination of the root cause(s) is crucial for defining effective corrective actions to prevent reoccurrence.

Error	<p>is an action or inaction by a person that may lead to deviations from accepted procedures or regulations.</p> <p><i>Note: Errors are often associated with occasions when a planned sequence of mental or physical activities either fails to achieve its intended outcome, or is not appropriate with regard to the intended outcome, and when results cannot be attributed purely to chance.</i></p>
Fatigue	<p>is a physiological state of reduced mental or physical performance capability resulting from sleep loss or extended wakefulness, circadian phase, or workload (mental and/or physical activity) that can impair a person's alertness and ability to safely perform his or her tasks.</p>
Hazard	<p>is a condition or an object with the potential to cause or contribute to an aircraft incident or accident.</p>
Human factors	<p>is anything that affects human performance, which means principles that apply to aeronautical activities, and which seek safe interface between the human and other system components by proper consideration of human performance.</p>
Human performance	<p>refers to human capabilities and limitations which have an impact on the safety and efficiency of aeronautical activities.</p>
Inspection	<p>in the context of compliance monitoring and oversight, refers to an independent documented conformity evaluation by observation and judgement accompanied, as appropriate, by measurement, testing or gauging, in order to verify compliance with applicable requirements.</p> <p><i>Note: Inspection may be part of an audit (e.g. product audit), but may also be conducted outside of the normal audit plan; for example, to verify closure of a particular finding.</i></p>
Just culture	<p>Ref. Regulation (EU) No 376/2014, Article 2.</p>
Line maintenance	<p>Ref. AMC1 145.A.10</p>
Near miss	<p>is an event in which an occurrence to be mandatorily reported according to Regulation (EU) No 376/2014 was narrowly averted or avoided.</p> <p><i>Example: A mechanic on rechecking his or her work at the end of a task realises that one work card step was not properly carried out.</i></p>
Organisational factor	<p>is a condition that affects the effectiveness of safety risk controls, related to the culture, policies, processes, resources, and workplace of an organisation.</p>
Oversight planning cycle	<p>refers to the time frame within which all areas of the approval and all processes should be reviewed by the competent authority by means of audits and inspections.</p>
Oversight programme	<p>refers to the detailed oversight schedule that defines the number of audits and inspections, the scope and duration of each audit and inspection, including details of product audits and locations, as appropriate, to be performed by the competent authority, and the tentative time frame for performing each audit and inspection.</p>
Preventive action	<p>is the action to eliminate the cause of a potential non-compliance or other undesirable potential situations.</p>
Risk assessment	<p>is an evaluation based on engineering and operational judgement and/or analysis methods in order to establish whether the achieved or perceived risk is acceptable or tolerable.</p>

Safety culture	is an enduring set of values, norms, attitudes, and practices within an organisation concerned with minimising the exposure of the workforce and the general public to dangerous or hazardous conditions. In a positive safety culture, a shared concern for, commitment to, and accountability for safety is promoted.
Safety risk	refers to the predicted probability and severity of the consequences or outcomes of a hazard.
Safety training	<p>refers to dedicated training to support safety management policies and processes, including human factors training.</p> <p><i>Note: The main purpose of the safety training programme is to ensure that personnel at all levels of the organisation maintain their competency to fulfil their roles safely. Safety training should, in particular, consider the safety knowledge derived from hazard identification and risk management processes, and support the fostering of a positive safety culture.</i></p> <p><i>Note: Safety management training refers to specific training for the staff involved in safety management functions in accordance with point 145.A.30(ca) or 145.A.200(a)(3).</i></p>
Working days	refer to days between and including Monday to Friday, not including public holidays.

SECTION A — TECHNICAL AND ORGANISATION REQUIREMENTS

145.A.10 Scope

Regulation (EU) 2021/1963

This Section establishes the requirements to be met by an organisation to qualify for the issue or continuation of an approval certificate for the maintenance of aircraft and components.

AMC1 145.A.10 Scope

ED Decision 2022/011/R

LINE MAINTENANCE AND BASE MAINTENANCE

- (a) 'Line maintenance' refers to limited maintenance for the aircraft suitable to be carried out whilst the aircraft remains in the air operation environment.

Line maintenance may include:

- trouble shooting;
- defect rectification;
- component replacement with use of external test equipment if required. Component replacement may include components such as engines and propellers;
- maintenance that will detect obvious unsatisfactory conditions/discrepancies/malfunctions, but does not require extensive in-depth inspection. It may also include internal structure, systems and powerplant items which are visible through quick opening access panels/doors/ports;
- repairs, modifications and other maintenance tasks which do not require extensive disassembly and can be accomplished by simple means.

- (b) 'Base maintenance' refers to any maintenance for the aircraft other than line maintenance.

- (c) Organisations maintaining aircraft should have a procedure to determine whether the tasks or groups of tasks to be carried out fall under the line maintenance or base maintenance scope of the organisation, with due regard to the expected duration of the maintenance, number and type of tasks, shifts and disciplines involved, work environment, etc.

For temporary or occasional cases, the organisation may also have a procedure which allows, subject to a task assessment (including all relevant aspects and conditions), to conduct a base maintenance task under line maintenance environment.

- (d) In particular, maintenance tasks of aircraft subject to 'progressive' or 'equalised' maintenance programmes should be individually assessed in respect of such procedure to ensure that all the tasks within the particular check can be carried out safely and to the required standards at the designated line maintenance station.

GM1 145.A.10 Scope

ED Decision 2022/011/R

SMALL ORGANISATIONS

This Guidance Material (GM) provides guidance on how the following small organisations satisfy the intent of [Part-145](#):

- (a) Organisations that only employ one person, who carries out the certification function and other functions, and that are approved under [Part-145](#) may use the alternatives provided below limited to the following terms of approval:
- **Class A2** Base and line maintenance of aeroplanes of 5 700 kg maximum take-off mass (MTOM) or less (with piston engines only)
 - **Class A3** Base and line maintenance of single-engined helicopters of 3 175 kg MTOM or less
 - **Class A4** Aircraft other than A1, A2 and A3 aircraft
 - **Class B2** Piston engines with maximum output of less than 450 HP
 - **Class C** Components
 - **Class D1** Non-destructive testing

[145.A.30\(b\)](#): The minimum requirement is for one full-time person who meets the [Part-66](#) requirements for certifying staff and holds the position of ‘accountable manager, safety manager, maintenance engineer and is also certifying staff and, if applicable, airworthiness review staff’. No other person may issue a certificate of release to service and therefore if that person is absent, no maintenance may be released during such absence.

- (1) The independent audit element of the compliance monitoring function of point [145.A.200\(a\)\(6\)](#) may be subcontracted to an appropriate organisation approved under [Part-145](#) or contracted to a person with appropriate technical knowledge and extensive experience of audits, working under the management system of the organisation, with the agreement of the competent authority.

Note: ‘Full-time’ for the purpose of [Part-145](#) means not less than 35 hrs per week except during vacation periods.

- (2) [145.A.35](#). In the case of an approval based on one person using an independent audit monitoring arrangement as referred to in point (1), the requirement for a record of certifying staff is satisfied by the submission to and acceptance by the competent authority of the MOE. With only one person, the requirement for a separate record of authorisation is unnecessary because the EASA Form 3 certificate defines the authorisation. An appropriate statement, to reflect this situation, should be included in the exposition.
- (3) [145.A.200\(a\)\(6\)](#). It is the responsibility of the organisation or person referred to in point (1) to make a minimum of two on-site audits every year, and it is the responsibility of this organisation or person to carry out these activities on the basis of one pre-announced visit and one unannounced visit to the maintenance organisation.

It is the responsibility of the [Part-145](#) organisation to ensure that effective implementation of all corrective actions takes place.

(b) Recommended operating procedure for a [Part-145](#) organisation based upon up to 10 persons involved in maintenance.

- (1) [145.A.30\(b\)](#) and [145.A.30\(c\)](#): The normal minimum requirement is for the employment on a full-time basis of two persons who meet the applicable requirements for certifying staff, whereby one holds the position of ‘maintenance engineer’ and the other holds the position of ‘compliance monitoring engineer’.

Either person can assume the responsibilities of the accountable manager and safety manager provided that they can comply in full with the applicable elements of points [145.A.30\(a\)](#) and [145.A.30\(ca\)](#), but the ‘maintenance engineer’ is the certifying person in order to retain the independence of the ‘compliance monitoring engineer’ to carry out audits. Nothing prevents either engineer from undertaking maintenance tasks provided that the ‘maintenance engineer’ issues the certificate of release to service. This ‘maintenance engineer’ may also be nominated as airworthiness review staff to carry out airworthiness reviews and to issue the corresponding airworthiness review certificate for aircraft for which Part-ML applies in accordance with [ML.A.903](#).

The ‘compliance monitoring engineer’ should have similar qualifications and status to the ‘maintenance engineer’ for reasons of credibility, unless he/she has a proven track record in aircraft compliance monitoring, in which case some reduction in the extent of his or her maintenance qualifications may be permitted.

In cases where the competent authority agrees that it is not practical for the organisation to nominate a person responsible for the independent audit of the compliance monitoring function, this element may be arranged in accordance with point (a)(1).

145.A.15 Application for an organisation certificate

Regulation (EU) 2021/1963

- (a) An application for a certificate or an amendment to an existing certificate in accordance with this Annex shall be made in a form and manner established by the competent authority, taking into account the applicable requirements of [Annex I \(Part-M\)](#), [Annex Vb \(Part-ML\)](#) and this Annex.
- (b) Applicants for an initial certificate pursuant to this Annex shall provide the competent authority with:
1. the results of a pre-audit performed by the organisation against the applicable requirements provided for in [Annex I \(Part-M\)](#), [Annex Vb \(Part-ML\)](#) and this Annex;
 2. documentation demonstrating how they will comply with the requirements established in this Regulation.

AMC1 145.A.15 Application for an organisation certificate

ED Decision 2022/011/R

An application should be made on an [EASA Form 2](#) (refer to [Appendix III to AMC1 145.A.15](#)) or an equivalent form that is acceptable to the competent authority.

EASA Form 2 is valid for the application for other types of organisations pursuant to Regulation (EU) No 1321/2014. Organisations that apply for several certificates may do so using a single EASA Form 2.

AMC2 145.A.15 Application for an organisation certificate

ED Decision 2022/011/R

GENERAL

- (a) Draft documents should be submitted at the earliest opportunity so that the assessment of the application can begin. The initial certification or approval of changes cannot take place until the competent authority has received the completed documents.
- (b) This information, including the results of the pre-audit specified in point [145.A.15\(b\)\(1\)](#), will enable the competent authority to conduct its assessment in order to determine the volume of certification and oversight work that is necessary, and the locations where it will be carried out.
- (c) The intent of the internal pre-audit referred to in point [145.A.15\(b\)\(1\)](#) is to ensure that the organisation has internally verified its compliance with the Regulation. This should allow the organisation to demonstrate to the competent authority the extent to which the applicable requirements are complied with, and to provide assurance that the organisation management system (including compliance monitoring system) is established to a level that is sufficient to perform maintenance activities.

145.A.20 Terms of approval and scope of work

Regulation (EU) 2021/1963

- (a) The organisation's scope of work shall be specified in the maintenance organisation exposition (MOE) in accordance with point [145.A.70](#).
- (b) The organisation shall comply with the terms of approval attached to the organisation certificate issued by the competent authority, and with the scope of work specified in the MOE.

AMC1 145.A.20 Terms of approval and scope of work

ED Decision 2022/011/R

The following table identifies the ATA Specification 2200 chapter for the category C component rating. If the maintenance manual (or equivalent document) does not follow the ATA Chapters, the corresponding subjects still apply to the applicable C rating.

CLASS	RATING	ATA CHAPTERS
COMPONENTS OTHER THAN COMPLETE ENGINES OR APUs	C1 Air Cond & Press	21
	C2 Auto Flight	22
	C3 Comms and Nav	23 - 34
	C4 Doors - Hatches	52
	C5 Electrical Power & Lights	24 – 33 - 85
	C6 Equipment	25 - 38 - 44 – 45 - 50
	C7 Engine – APU	49 - 71 - 72 - 73 - 74 - 75 - 76 - 77 - 78 - 79 - 80 - 81 - 82 - 83
	C8 Flight Controls	27 - 55 - 57.40 - 57.50 - 57.60 - 57.70
	C9 Fuel	28 - 47
	C10 Helicopters - Rotors	62 - 64 - 66 - 67
	C11 Helicopter - Trans	63 - 65
	C12 Hydraulic Power	29
	C13 Indicating/Recording Systems	31 – 42 - 46
	C14 Landing Gear	32

CLASS	RATING	ATA CHAPTERS
	C15 Oxygen	35
	C16 Propellers	61
	C17 Pneumatic & Vacuum	36 - 37
	C18 Protection ice/rain/fire	26 - 30
	C19 Windows	56
	C20 Structural	53 - 54 - 57.10 - 57.20 - 57.30
	C21 Water Ballast	41
	C22 Propulsion Augmentation	84

AMC2 145.A.20 Terms of approval and scope of work

ED Decision 2022/011/R

Facilities such as stores, line stations, component or subcontractors workshops that are not located together with the main facilities of the organisation may be covered by the organisation approval without being identified on the organisation certificate, provided that the MOE identifies these facilities and contains procedures to control such facilities, and the competent authority is satisfied that they form an integral part of the approved maintenance organisation.

145.A.25 Facility requirements

Regulation (EU) No 1321/2014

The organisation shall ensure that:

- (a) Facilities are provided appropriate for all planned work, ensuring in particular, protection from the weather elements. Specialised workshops and bays are segregated as appropriate, to ensure that environmental and work area contamination is unlikely to occur.
 1. For base maintenance of aircraft, aircraft hangars are both available and large enough to accommodate aircraft on planned base maintenance;
 2. For component maintenance, component workshops are large enough to accommodate the components on planned maintenance.
- (b) Office accommodation is provided for the management of the planned work referred to in point (a), and certifying staff so that they can carry out their designated tasks in a manner that contributes to good aircraft maintenance standards.
- (c) The working environment including aircraft hangars, component workshops and office accommodation is appropriate for the task carried out and in particular special requirements observed. Unless otherwise dictated by the particular task environment, the working environment must be such that the effectiveness of personnel is not impaired:
 1. temperatures must be maintained such that personnel can carry out required tasks without undue discomfort.
 2. dust and any other airborne contamination are kept to a minimum and not be permitted to reach a level in the work task area where visible aircraft/component surface contamination is evident. Where dust/other airborne contamination results in visible surface contamination, all susceptible systems are sealed until acceptable conditions are re-established.

3. lighting is such as to ensure each inspection and maintenance task can be carried out in an effective manner.
 4. noise shall not distract personnel from carrying out inspection tasks. Where it is impractical to control the noise source, such personnel are provided with the necessary personal equipment to stop excessive noise causing distraction during inspection tasks.
 5. where a particular maintenance task requires the application of specific environmental conditions different to the foregoing, then such conditions are observed. Specific conditions are identified in the maintenance data.
 6. the working environment for line maintenance is such that the particular maintenance or inspection task can be carried out without undue distraction. Therefore where the working environment deteriorates to an unacceptable level in respect of temperature, moisture, hail, ice, snow, wind, light, dust/other airborne contamination, the particular maintenance or inspection tasks must be suspended until satisfactory conditions are re-established.
- (d) Secure storage facilities are provided for components, equipment, tools and material. Storage conditions ensure segregation of serviceable components and material from unserviceable aircraft components, material, equipment and tools. The conditions of storage are in accordance with the manufacturer's instructions to prevent deterioration and damage of stored items. Access to storage facilities is restricted to authorised personnel.

AMC1 145.A.25(a) Facility requirements

ED Decision 2022/011/R

1. Where the hangar is not owned by the organisation, it may be necessary to establish proof of tenancy. In addition, sufficiency of hangar space to carry out planned base maintenance should be demonstrated by the preparation of a projected aircraft hangar visit plan relative to the intended maintenance activities. The aircraft hangar visit plan should be updated on a regular basis.
2. Protection from the weather elements relates to the normal prevailing local weather elements that are expected throughout any twelve month period. Aircraft hangar and component workshop structures should prevent the ingress of rain, hail, ice, snow, wind and dust etc. Aircraft hangar and component workshop floors should be sealed to minimise dust generation.
3. For line maintenance of aircraft, hangars are not essential but it is recommended that access to hangar accommodation be demonstrated for usage during inclement weather for minor scheduled work and lengthy defect rectification.
4. Subject to a risk assessment and agreement by the competent authority, the organisation may use facilities at the approved location other than a base maintenance hangar for certain aircraft base maintenance tasks, provided that those facilities offer levels of weather and environmental protection that are equivalent to those of a base maintenance hangar, as well as a suitable working environment for the particular work package. This does not exempt an organisation from the requirement to have a base maintenance hangar in order to be approved to conduct base maintenance at a given location.

AMC 145.A.25(b) Facility requirements

ED Decision 2015/029/R

It is acceptable to combine any or all of the office accommodation requirements into one office subject to the staff having sufficient room to carry out the assigned tasks.

In addition, as part of the office accommodation, aircraft maintenance staff should be provided with an area where they may study maintenance instructions and complete maintenance records in a proper manner.

AMC 145.A.25(d) Facility requirements

ED Decision 2015/029/R

1. Storage facilities for serviceable aircraft components should be clean, well-ventilated and maintained at a constant dry temperature to minimise the effects of condensation. Manufacturer's storage recommendations should be followed for those aircraft components identified in such published recommendations.
2. Storage racks should be strong enough to hold aircraft components and provide sufficient support for large aircraft components such that the component is not distorted during storage.
3. All aircraft components, wherever practicable, should remain packaged in protective material to minimise damage and corrosion during storage.

145.A.30 Personnel requirements

Regulation (EU) 2021/1963

- (a) The organisation shall appoint an accountable manager that has corporate authority to ensure that all maintenance activities of the organisation can be financed and carried out in accordance with Regulation (EU) 2018/1139 and its delegated and implementing acts. The accountable manager shall:
1. ensure that all necessary resources are available to accomplish maintenance in accordance with this Annex, [Annex I \(Part-M\)](#) and [Annex Vb \(Part-ML\)](#), as applicable, to support the organisation certificate;
 2. establish and promote the safety policy specified in point [145.A.200\(a\)\(2\)](#);
 3. demonstrate a basic understanding of this Regulation.

Regulation (EU) 2021/1963

- (b) The accountable manager shall nominate a person or group of persons representing the management structure for the maintenance functions and with the responsibility to ensure that the organisation works in accordance with the MOE and approved procedures. It shall be made clear in the procedures who deputises for a particular person in the case of lengthy absence of that person.

Regulation (EU) 2021/1963

- (c) The accountable manager shall nominate a person or group of persons with the responsibility to manage the compliance monitoring function as part of the management system.

Regulation (EU) 2021/1963

- (ca) The accountable manager shall nominate a person or group of persons with the responsibility to manage the development, administration and maintenance of effective safety management processes as part of the management system.

Regulation (EU) 2021/1963

- (cb) The person or group of persons nominated in accordance with points (b), (c) and (ca) shall have a responsibility to the accountable manager and direct access to him/her to keep him/her properly informed on compliance and safety matters.

Regulation (EU) 2021/1963

- (cc) The person or persons nominated in accordance with points (b), (c) and (ca) shall be able to demonstrate relevant knowledge, background and satisfactory experience related to aircraft or component maintenance and demonstrate a working knowledge of this Regulation.

Regulation (EU) 2021/1963

- (d) The organisation shall have a maintenance man-hour plan to ensure it has sufficient and appropriately qualified staff to plan, perform, supervise, inspect and monitor the organisation's activities in accordance with the terms of approval. In addition, the organisation shall have a procedure to reassess the work intended to be carried out when the actual staff availability is reduced compared to the planned staffing level for a particular work shift or period.

Regulation (EU) 2021/1963

- (e) The organisation shall establish and control the competency of the personnel involved in any maintenance, airworthiness reviews, safety management and compliance monitoring in accordance with a procedure and to a standard agreed with the competent authority. In addition to the necessary expertise related to the job function, the competency of the personnel must include an understanding of the application of safety management principles, including human factors and human performance issues, which is appropriate to their function and responsibilities in the organisation.

Regulation (EU) 2018/1142

- (f) The organisation shall ensure that personnel who carry out or control a continued-airworthiness non-destructive test of aircraft structures or components, or both, are appropriately qualified for the particular non-destructive test in accordance with the European or equivalent standard recognised by the Agency. Personnel who carry out any other specialised task shall be appropriately qualified in accordance with officially recognised standards. By derogation from this point, personnel referred to in point (g), points (h)(1) and (h)(2), qualified in category B1, B3 or L in accordance with [Annex III \(Part-66\)](#), may carry out and/or control colour contrast dye penetrant tests.

Regulation (EU) 2018/1142

- (g) Any organisation maintaining aircraft, except where stated otherwise in point (j), shall in the case of aircraft line maintenance, have appropriate aircraft-rated certifying staff qualified as category B1, B2, B2L, B3 and L, as appropriate, in accordance with [Annex III \(Part-66\)](#) and point [145.A.35](#).

In addition such organisations may also use appropriately task-trained certifying staff holding the privileges set out in points [66.A.20\(a\)\(1\)](#) and [66.A.20\(a\)\(3\)\(ii\)](#) and qualified in accordance with [Annex III \(Part-66\)](#) and point [145.A.35](#) to carry out minor scheduled line maintenance and simple defect rectification. The availability of such certifying staff shall not replace the need for category B1, B2, B2L, B3 and L certifying staff, as appropriate.

Regulation (EU) 2018/1142

- (h) Any organisation maintaining aircraft, except where stated otherwise in point (j), shall:
1. in the case of base maintenance of complex motor-powered aircraft, have appropriate aircraft-type-rated certifying staff, qualified as category C in accordance with [Annex III \(Part-66\)](#) and point [145.A.35](#). In addition, the organisation shall have sufficient aircraft-type-rated staff qualified as category B1 and B2, as appropriate, in accordance with [Annex III \(Part-66\)](#) and point [145.A.35](#) to support the category C certifying staff.
 - (i) Category B1 and B2 support staff shall ensure that all relevant tasks or inspections have been carried out to the required standard before the category C certifying staff issues the certificate of release to service.
 - (ii) The organisation shall maintain a register of any such category B1 and B2 support staff.
 - (iii) The category C certifying staff shall ensure that compliance with point (i) has been met and that all work required by the customer has been accomplished during the particular base maintenance check or work package, and shall also assess the impact of any work not carried out, with a view to either requiring its accomplishment or agreeing with the operator to defer such work to another specified check or time limit.
 2. in the case of base maintenance of aircraft other than complex motor-powered aircraft, have one of the following:
 - (i) appropriate aircraft-rated certifying staff, qualified as category B1, B2, B2L, B3 and L, as appropriate, in accordance with [Annex III \(Part-66\)](#) and point [145.A.35](#);
 - (ii) appropriate aircraft-rated certifying staff, qualified in category C and assisted by support staff, as set out in point [145.A.35\(a\)\(i\)](#).

Regulation (EU) 2018/1142

- (i) Component certifying staff shall be qualified in accordance with [Article 5\(6\)](#) and point [145.A.35](#).

Regulation (EU) 2021/1963

- (j) By way of derogation from points [\(g\)](#) and [\(h\)](#), in relation to the obligation to comply with [Annex III \(Part-66\)](#), the organisation may use certifying staff and support staff that are qualified in accordance with the following provisions:
1. For base maintenance carried out at a location outside a territory for which a Member State is responsible under the Chicago Convention, the certifying staff and support staff may be qualified in accordance with the national aviation regulations of the State in which the base maintenance facility is located, subject to the conditions specified in [Appendix IV to this Annex](#).
 2. For line maintenance carried out at a line station located outside a territory for which a Member State is responsible under the Chicago Convention, the certifying staff may be qualified, subject to the conditions specified in [Appendix IV to this Annex](#), in accordance with the following alternative conditions:
 - national aviation regulations of the State in which the line station is located,
 - national aviation regulations of the State in which the organisation's principal place of business is located.

3. For a repetitive pre-flight airworthiness directive which specifically states that the flight crew may carry out such airworthiness directive, the organisation may issue a limited certification authorisation to the pilot on the basis of the flight crew licence held. In that case, the organisation shall ensure that the pilot has carried out sufficient practical training ensuring that the pilot can accomplish the airworthiness directive.
4. If an aircraft is operated away from a supported location, the organisation may issue a limited certification authorisation to the pilot on the basis of the flight crew licence held, subject to being satisfied that the pilot has carried out sufficient practical training ensuring that the pilot can accomplish the specified task.
5. In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff are available, the organisation contracted to provide maintenance support may issue a one-off certification authorisation:
 - (i) to one of its employees holding equivalent type authorisations on aircraft of similar technology, construction and systems; or
 - (ii) to any person with not less than five years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.

All such cases as specified in this point must be reported to the competent authority within seven days after issuing such certification authorisation. The organisation issuing the one-off authorisation shall ensure that any such maintenance that could affect flight safety is re-checked by an appropriately approved organisation.

Regulation (EU) 2021/1963

- (k) If the organisation performs airworthiness reviews and issues the corresponding airworthiness review certificate in accordance with point [ML.A.903](#) of Annex Vb (Part-ML), it shall have airworthiness review staff that are qualified and authorised in accordance with point [145.A.37](#).

AMC1 145.A.30(a) Personnel requirements

ED Decision 2022/011/R

ACCOUNTABLE MANAGER

Accountable manager is normally intended to mean the chief executive officer of the approved maintenance organisation, who by virtue of his or her position has overall (including in particular financial) responsibility for running the organisation. The accountable manager may be the accountable manager for more than one organisation and is not necessarily required to be knowledgeable on technical matters, as the MOE defines the maintenance standards. When the accountable manager is not the chief executive officer, the organisation should demonstrate to the competent authority that the accountable manager has direct access to the chief executive officer and has the necessary funding allocation for the intended maintenance activities.

AMC1 145.A.30(b) Personnel requirements

ED Decision 2022/011/R

MANAGEMENT STRUCTURE FOR MAINTENANCE

The person or group of persons nominated under point [145.A.30\(b\)](#), with the responsibility to ensure that the organisation works in accordance with the MOE and approved procedures (i.e. responsibility for ensuring compliance) should represent the management structure of the organisation and be responsible for the daily operation of the organisation, in respect of all maintenance-related functions.

1. Dependent upon the size of the organisation, the [Part-145](#) maintenance functions may be divided under nominated persons or combined in any number of ways. However, a maintenance function cannot be combined with the compliance monitoring function.

The maintenance functions include maintenance/safety training, performance and certification of maintenance, equipment and component procurement, facility management, man-hour plan, etc., and it should be ensured that each [Part-145](#) maintenance function is attributed to one nominated person.

2. Dependent upon the extent of approval, the organisation structure should normally include a base maintenance manager, a line maintenance manager and a workshop manager, all of whom should report to the accountable manager except in a small [Part-145](#) organisation where any one manager may also be the accountable manager, as determined by the competent authority.
3. The base maintenance manager is responsible for ensuring that all base maintenance is carried out in the base maintenance hangar (or facility as provided for in point 4 of [AMC1 145.A.25\(a\)](#)) and to the standards specified in point [145.A.65](#). The base maintenance manager is also responsible for base maintenance-related corrective actions resulting from the compliance monitoring of point [145.A.200\(a\)\(6\)](#).
4. The line maintenance manager is responsible for ensuring that all line maintenance including line defect rectification is carried out to the standards specified in point [145.A.65](#). This manager is also responsible for line maintenance-related corrective actions resulting from the compliance monitoring of point [145.A.200\(a\)\(6\)](#).
5. The workshop manager is responsible for ensuring that all work on aircraft components in the workshop is carried out to the standards specified in point [145.A.65](#). This manager is also responsible for workshop-related corrective actions resulting from the compliance monitoring of point [145.A.200\(a\)\(6\)](#).
6. (reserved).
7. Notwithstanding the examples of titles provided in points 2 - 5, the organisation may adopt any title for the foregoing managerial positions but it should identify to the competent authority the titles and the persons chosen to carry out these functions.
8. Where an organisation chooses to appoint managers for all or any combination of the identified maintenance functions because of the size of the undertaking, these managers should report to the accountable manager through the nominated persons.

GM1 145.A.30(b) Personnel requirements

ED Decision 2022/011/R

RESPONSIBILITY FOR ENSURING COMPLIANCE

The person(s) nominated in accordance with [145.A.30\(b\)](#) are responsible, in the day-to-day maintenance activities, for ensuring that the organisation personnel work in accordance with the applicable procedures and regulatory requirements.

These nominated persons should demonstrate a complete understanding of the applicable regulatory requirements, and ensure that the organisation's processes and standards accurately reflect these requirements. It is their role to ensure that compliance is proactively managed, and that early warning signs of non-compliance are documented and acted upon.

AMC1 145.A.30(c);(ca) Personnel requirements

ED Decision 2022/011/R

SAFETY MANAGEMENT AND COMPLIANCE MONITORING FUNCTION

(a) Safety management

If more than one person is designated for the development, administration and maintenance of effective safety management processes, the accountable manager should identify the person who acts as the unique focal point, i.e. the 'safety manager'.

The functions of the safety manager should be to:

- (i) facilitate hazard identification, risk assessment and management;
- (ii) monitor the implementation of actions taken to mitigate risks, as listed in the safety action plan, unless action follow-up is addressed by the compliance monitoring function;
- (iii) provide periodic reports on safety performance to the safety review board (the functions of the safety review board are those defined in [AMC1 145.A.200\(a\)\(1\)](#));
- (iv) ensure the maintenance of safety management documentation;
- (v) ensure that there is safety training available, and that it meets acceptable standards;
- (vi) provide advice on safety matters; and
- (vii) ensure the initiation and follow-up of internal occurrence investigations.

(b) Compliance monitoring function

If more than one person is designated for the compliance monitoring function, the accountable manager should identify the person who acts as the unique focal point, i.e. the 'compliance monitoring manager'.

- (1) The role of the compliance monitoring manager should be to ensure that:
 - (i) the activities of the organisation are monitored for compliance with the applicable requirements and any additional requirements as established by the organisation, and that these activities are carried out properly under the supervision of the nominated persons referred to in points [\(b\)](#), [\(c\)](#) and [\(ca\)](#) of point 145.A.30;
 - (ii) any maintenance contracted to another maintenance organisation is monitored for compliance with the contract or work order;
 - (iii) an audit plan is properly implemented, maintained, and continually reviewed and improved; and

- (iv) corrections and corrective actions are requested as necessary.
- (2) The compliance monitoring manager should:
 - (i) not be one of the persons referred to in point [145.A.30\(b\)](#);
 - (ii) be able to demonstrate relevant knowledge, background and appropriate experience related to the activities of the organisation, including knowledge and experience in compliance monitoring; and
 - (iii) have access to all parts of the organisation, and as necessary, any subcontracted organisation.
- (c) If the functions related to compliance monitoring or safety management are combined with other duties, the organisation should ensure that this does not result in any conflicts of interest. In particular, the compliance monitoring function should be independent from the maintenance functions.
- (d) If the same person is designated to manage both the compliance monitoring function and safety management-related processes and tasks, the accountable manager, with regard to his or her direct accountability for safety, should ensure that sufficient resources are allocated to both functions, taking into account the size of the organisation, and the nature and complexity of its activities.
- (e) Subject to a risk assessment and/or mitigation actions, and agreement by the competent authority, with due regard to the size of the organisation and the nature and complexity of its activities, the compliance monitoring manager role and/or safety manager role may be exercised by the accountable manager, provided that he or she has demonstrated the related competency.

GM1 145.A.30(ca) Personnel requirements

ED Decision 2022/011/R

SAFETY MANAGER

- (a) Depending on the size of the organisation and the nature and complexity of its activities, the safety manager may be assisted by additional safety personnel in performing all the safety management tasks defined in [AMC1 145.A.200\(a\)\(1\)](#).
- (b) Regardless of the organisational set-up, it is important that the safety manager remains the unique focal point for the development, administration, and maintenance of the organisation's safety management processes.

GM1 145.A.30(cb) Personnel requirements

ED Decision 2022/011/R

RESPONSIBILITY OF THE NOMINATED PERSONS TO THE ACCOUNTABLE MANAGER

There are different ways to set up the organisation including the possibility to have managerial layers between the accountable manager and the nominated person. But the key principle is that, regardless of the arrangement, there is one nominated person responsible for each [Part-145](#) function, this responsibility is recognised by that nominated person and the accountable manager, and a direct communication channel exists between them. The nominated person's responsibility should not be diluted into the various levels of management and should be free of conflicts of interest.

AMC1 145.A.30(cc) Personnel requirements

ED Decision 2022/011/R

KNOWLEDGE, BACKGROUND AND EXPERIENCE OF NOMINATED PERSON(S)

The person or persons to be nominated in accordance with points [\(b\)](#), [\(c\)](#) and [\(ca\)](#) of point 145.A.30 should have:

- (a) practical experience and expertise in the application of aviation safety standards and safe operating practices;
- (b) knowledge of:
 - (1) human factors principles;
 - (2) EU management system requirements and their application (including safety management systems and compliance monitoring);
- (c) 5 years of relevant work experience, of which at least 2 years should be from the aeronautical industry in an appropriate position;
- (d) a relevant engineering or technical degree, or an aircraft technician or maintenance engineer qualification with additional education that is acceptable to the competent authority. 'Relevant engineering or technical degree' means a degree from aeronautical, mechanical, electrical, electronic, avionics or other studies that are relevant to the maintenance and/or continuing airworthiness of aircraft/aircraft components.

The provision set out in the first paragraph of point (d) may be replaced by 2 years of experience in addition to those already recommended by paragraph (c) above. These 2 years should cover an appropriate combination of experience in tasks/activities related to maintenance and/or continuing airworthiness management and/or the surveillance of such tasks.

For the person to be nominated in accordance with point [\(c\)](#) or [\(ca\)](#) of point 145.A.30, in the case where the organisation holds one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and that person has already an equivalent position (i.e. compliance monitoring manager, safety manager) under the additional certificate(s) held, the provisions set out in the first two paragraphs of point (d) may be replaced by the completion of a specific training programme acceptable to the competent authority to gain an adequate understanding of maintenance standards and continuing airworthiness concepts and principles;

- (e) thorough knowledge of the organisation's MOE and safety policy;
- (f) knowledge of a relevant sample of the type(s) of aircraft or components gained through a formalised training course. These courses could be provided by a [Part-147](#) organisation, by the manufacturer, by the [Part-145](#) organisation or by any other organisation accepted by the competent authority. Aircraft/engine type training courses should be at least at a level equivalent to the [Part-66 Appendix III](#) Level 1 General Familiarisation.

'Relevant sample' means that these courses should cover typical aircraft or components that are within the scope of work of the organisation.

For all balloons and any other aircraft of 2 730 kg MTOM or less, the formalised training courses may be replaced by a demonstration of the required knowledge by providing documented evidence, or by an assessment acceptable to the competent authority. This assessment should be recorded;

- (g) knowledge of the relevant maintenance methods (and how they are applied in the organisation) and/or specific knowledge relevant to the area for which the person will be nominated;

- (h) knowledge of the applicable regulations;
- (i) adequate language and communication skills.

AMC1 145.A.30(d) Personnel requirements

ED Decision 2022/011/R

SUFFICIENT NUMBER OF PERSONNEL

1. Has sufficient staff means that the organisation employs or contracts competent staff, as detailed in the man-hour plan, of which at least half the staff that perform maintenance in each workshop, hangar or flight line on any shift should be employed to ensure organisational stability. For the purpose of meeting a specific operational necessity, a temporary increase of the proportion of contracted staff may be permitted to the organisation by the competent authority, in accordance with an approved procedure which should describe the extent, specific duties, and responsibilities for ensuring adequate organisation stability. For the purpose of this subparagraph, employed means the person is directly employed as an individual by the maintenance organisation approved under [Part-145](#), whereas contracted means the person is employed by another organisation and contracted by that organisation to the maintenance organisation approved under [Part-145](#).
2. The maintenance man-hour plan should take into account all maintenance activities carried out outside the scope of the [Part-145](#) approval.

The planned absence (for training, vacations, etc.) should be considered when developing the man-hour plan.
3. The maintenance man-hour plan should relate to the anticipated maintenance work load except that when the organisation cannot predict such workload, due to the short term nature of its contracts, then such plan should be based upon the minimum maintenance workload needed for commercial viability. Maintenance work load includes all necessary work such as, but not limited to, planning, maintenance record checks, production of worksheets/cards in paper or electronic form, accomplishment of maintenance, inspection and the completion of maintenance records.
4. For aircraft base maintenance, the maintenance man-hour plan should relate to the aircraft hangar visit plan as specified in [AMC1 145.A.25\(a\)](#).
5. For aircraft component maintenance, the maintenance man-hour plan should relate to the aircraft component planned maintenance as specified in point [145.A.25\(a\)\(2\)](#).
6. The man-hours allocated to the compliance monitoring function should be sufficient to meet the requirement of point [145.A.200\(a\)\(6\)](#) which means taking into account the AMC to [145.A.200\(a\)\(6\)](#). Where compliance monitoring staff also perform other functions, the time allocated to those functions needs to be taken into account in determining the number of compliance monitoring staff.
7. The maintenance man-hour plan should be reviewed at least every 3 months and updated when necessary.
8. Significant deviation from the maintenance man-hour plan should be reported through the departmental manager to the compliance monitoring manager and the accountable manager for review. It may also be reported through the internal safety reporting scheme. A significant deviation means that there is more than a 25% shortfall in available man-hours during a calendar month for any one of the functions specified in point [145.A.30\(d\)](#).

9. In addition, as part of its management system in accordance with point [145.A.200](#), the organisation should have a procedure to assess and mitigate the risks:
- (1) if the actual number of staff available is less than the planned staffing level for any particular work shift or period;
 - (2) if there is a temporary increase in the proportion of contracted staff in order to meet specific operational needs.

AMC1 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

COMPETENCY ASSESSMENT OBJECTIVES

The procedure referred to in [145.A.30\(e\)](#) should require amongst others that planners, mechanics, specialised services staff, supervisors, certifying staff and support staff, whether employed or contracted, are assessed for competency before unsupervised work commences and competency is controlled on a continuous basis.

Competency should be assessed by the evaluation of:

- on-the-job performance and/or testing of knowledge by appropriately qualified personnel, and
- records for basic, organisational, or tasks training and/or product type and differences training, and
- experience records.

Validation of the above could include a confirmation check with the organisation(s) that issued the document(s). For that purpose, experience/training may be recorded in a document such as a log book, or based on the suggested template in [GM3 145.A.30\(e\)](#).

As a result of this assessment, an individual's qualifications should determine:

- the scope of tasks this individual is authorised to perform and/or supervise and/or sign off (as applicable) or which level of ongoing supervision would be required;
- whether there is a need for additional training.

A record should be kept of each individual's qualifications and competency assessment (refer also to point [145.A.55\(d\)](#)). This should include copies of all documents that attest to their qualifications, such as a licence and/or any authorisation held, as applicable.

For a proper competency assessment of its personnel, the organisation should consider that:

1. In accordance with the job function, adequate initial and recurrent training has been received by the staff and recorded to ensure continued competency so that it is maintained throughout the duration of the employment/contract.
2. All staff should be able to demonstrate knowledge of, and compliance with, the maintenance organisation's procedures, as applicable to their duties.
3. All staff should be able to demonstrate an understanding of the safety management principles, including human factors related to their job function, and be trained as per [AMC4 145.A.30\(e\)](#).
4. To assist in the assessment of competency and to establish the training needs analysis, job descriptions are recommended for each job function in the organisation. Job descriptions should contain sufficient criteria to enable the required competency assessment.

5. Criteria should allow the assessment to establish that, among other aspects (titles might be different in each organisation):
- Managers are able to properly manage the work output, processes, resources and priorities described in their assigned duties, accountabilities and responsibilities in accordance with the safety policy and objectives and in compliance with the applicable requirements.
 - Planners are able to interpret maintenance requirements into maintenance tasks, and have an understanding that they have no authority to deviate from the maintenance data. They are able to organise maintenance activities in an effective manner and in consideration of human performance limitations.
 - Supervisors are able to ensure that all the required maintenance tasks are carried out and, if they are not completed or it is evident that a particular maintenance task cannot be carried out according to the maintenance data, that these problems will be adequately addressed to eliminate the non-compliance, and reported through the internal safety reporting scheme to prevent their reoccurrence. In addition, for those supervisors, who also carry out maintenance tasks, the assessment should ensure that they understand that such tasks should not be undertaken if they are incompatible with their management responsibilities.
 - Mechanics are able to carry out maintenance tasks to any standard specified in the maintenance data, and will notify their supervisors of any defects or mistakes requiring rectification to re-establish the required maintenance standards.
 - Specialised services staff are able to carry out specialised maintenance tasks to the standard specified in the maintenance data. They should be able to communicate with their supervisors and report accurately when necessary.
 - Support staff are able to determine that the relevant tasks or inspections have been carried out to the required standard.
 - Certifying staff are able to determine when the aircraft or aircraft component maintenance is ready to be released to service and when it should not be released to service.
 - Compliance monitoring staff are able to monitor compliance with this Regulation and to identify non-compliances in an effective and timely manner so that the organisation may remain in compliance with this Regulation.
 - Staff who have safety management responsibilities are familiar with the relevant processes in terms of hazard identification, risk management, and the monitoring of safety performance.
 - All staff are familiar with the safety policy and the procedures and tools that can be used for internal safety reporting.

The competency assessment should be based upon the procedure specified in [GM2 145.A.30\(e\)](#).

AMC2 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

COMPETENCY ASSESSMENT PROCEDURE

- (a) The organisation should develop a procedure that describes the process for conducting competency assessments of personnel. The procedure should specify:
 - (1) the persons who are responsible for this process;
 - (2) when the assessments should take place;
 - (3) how to give credit from previous assessments;
 - (4) how to validate qualification records;
 - (5) the means and methods to be used for the initial assessment;
 - (6) the means and methods to be used for the continuous control of competency, including how to gather feedback on the performance of personnel;
 - (7) the aspects of competencies to be observed during the assessment in relation to each job function;
 - (8) the actions to be taken if the assessment is not satisfactory; and
 - (9) how to record the assessment results.
- (b) Competency may be assessed by having the person work under the supervision of another qualified person for a sufficient time to arrive at a conclusion. Sufficient time could range from several days to several weeks depending on the complexity of the task(s) and the work exposure. The person need not be assessed against the complete spectrum of their intended duties. If the person has been recruited from another approved maintenance organisation, a written confirmation from the previous organisation could be taken into consideration to reduce the duration of the assessment.
- (c) All prospective maintenance staff should be assessed for their competency related to their intended duties.

AMC3 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

INITIAL AND RECURRENT TRAINING

- (a) Adequate initial and recurrent training should be provided in relation to the job function to ensure that staff remain competent. Completion of such training should be recorded.
- (b) Recurrent training should take into account the information reported through the internal safety reporting scheme (see point (c)(3) of [AMC1 145.A.202](#)).
- (c) Those responsible for managing the compliance monitoring function should receive training on this task. Such training should cover the requirements of compliance monitoring, manuals and procedures related to the task, audit techniques, reporting, and recording.

AMC4 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

SAFETY TRAINING (INCLUDING HUMAN FACTORS)

- (a) With respect to the understanding of the application of safety management principles (including human factors), all maintenance organisation personnel should be assessed for the need to receive initial safety training.

Personnel involved in the delivery of the basic maintenance service of the organisation should receive both initial and recurrent safety training, appropriate for their responsibilities. This should include at least the following staff members:

- Nominated persons, line managers, supervisors;
- Certifying staff, support staff and mechanics;
- Technical support personnel such as planners, engineers, technical record staff;
- Persons involved in compliance monitoring and/or safety management-related processes and tasks, including the application of human factors principles, internal investigations and safety training;
- Specialised services staff;
- Stores department staff, purchasing department staff;
- Ground equipment operators.

The generic term 'line managers' refers to departmental heads or persons responsible for operational departments or functional units that are directly involved in the delivery of the basic maintenance services of the organisation.

- (b) Initial safety training should cover all the topics of the training syllabus specified in [GM1 145.A.30\(e\)](#) either as a dedicated course or else integrated within other training. The syllabus may be adjusted to reflect the particular nature of the organisation. The syllabus may also be adjusted to suit the particular nature of work for each function within the organisation. For example:

- small organisations not working in shifts may cover in less depth subjects related to teamwork and communication;
- planners may cover in more depth the scheduling and planning objectives of the syllabus, and in less depth the objective of developing skills for shift working.

All personnel identified in accordance with point (a) of this AMC, including personnel being recruited from any other organisation should receive initial safety training compliant with the organisation's training standards prior to commencing the actual job function, unless their competency assessment justifies that there is no need for such training. New, directly employed personnel working under direct supervision may receive training within 6 months after joining the maintenance organisation.

- (c) The purpose of recurrent safety training is primarily to ensure that staff remain current in terms of SMS principles and human factors and also to collect feedback on safety and human factors issues. Consideration should be given to involving compliance monitoring staff and the key safety management personnel in this training to provide a consistent presence and facilitate feedback. There should be a procedure to ensure that feedback is formally reported by the trainers through the internal safety reporting scheme to initiate action where necessary.

Recurrent safety training should be delivered either as a dedicated course or integrated within other training. It should be of an appropriate duration in each 2-year period in relation to the relevant compliance monitoring audit findings and other internal/external sources of information available to the organisation on safety and human factors maintenance issues.

- (d) Safety training may be conducted by the maintenance organisation itself, independent trainers, or any training organisations acceptable to the competent authority.
- (e) The safety training procedures should be specified in the MOE.

AMC5 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

OTHER TRAININGS

- (a) The organisation should assess the need for particular trainings, for example with regard to the 'Electrical Wiring Interconnection System' (EWIS) or 'Critical Design Configuration Control Limitations' (CDCCL).
- (b) Guidance on EWIS training programme for maintenance organisation personnel is provided in AMC 20-22.
- (c) Guidance on fuel tank safety training is provided in ['Appendix IV to AMC5 145.A.30\(e\) and AMC2 145.B.200\(a\)\(3\)'](#).

GM1 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

TRAINING SYLLABUS FOR INITIAL SAFETY TRAINING (INCLUDING HUMAN FACTORS)

The training syllabus below identifies the topics and subtopics to be addressed during the safety training.

The maintenance organisation may combine, divide, or change the order of any of the subjects in the syllabus to suit its own needs, as long as all the subjects are covered to a level of detail appropriate to the organisation and its personnel, including the varying level of seniority of that personnel.

Some of the topics may be covered in separate training courses (e.g. health and safety, management, supervisory skills, etc.) in which case duplication of training is not necessary.

Where possible, practical illustrations and examples should be used, especially accident and incident reports.

Topics should be related to existing legislation, where relevant. Topics should be related to existing guidance/advisory material, where relevant (e.g. ICAO HF Digests and Training Manual).

Topics should be related to the maintenance activities of the organisation to the greatest extent possible; too much unrelated theory should be avoided.

- 1. General/Introduction to safety management and human factors
 - 1.1. Need to address safety management and human factors
 - 1.2. Statistics
 - 1.3. Incidents
- 1a. Safety risk management
 - 1a.1. Hazard identification

- 1a.2. Safety risk assessment
- 1a.3. Risk mitigation and management
- 1a.4. Effectiveness of safety risk management
- 2. Safety Culture/Organisational factors
 - 2.1 Justness/trust
 - 2.2 Commitment to safety
 - 2.3 Adaptability
 - 2.4 Awareness
 - 2.5 Behaviour
 - 2.6 Information
- 3. Human Error
 - 3.1. Error models and theories
 - 3.2. Types of errors in maintenance tasks
 - 3.3. Violations
 - 3.4. Implications of errors
 - 3.5. Avoiding and managing errors
 - 3.6. Human reliability
- 4. Human performance & limitations
 - 4.1. Vision
 - 4.2. Hearing
 - 4.3. Information-processing
 - 4.4. Attention and perception
 - 4.5. Situational awareness
 - 4.6. Memory
 - 4.7. Claustrophobia and physical access
 - 4.8. Motivation
 - 4.9. Fitness/health
 - 4.10. Stress
 - 4.11. Workload management
 - 4.12. Fatigue
 - 4.13. Alcohol, medication, drugs
 - 4.14. Physical work
 - 4.15. Repetitive tasks/complacency
- 5. Environment
 - 5.1. Peer pressure

- 5.2. Stressors
- 5.3. Time pressure and deadlines
- 5.4. Workload
- 5.5. Shift work
- 5.6. Noise and fumes
- 5.7. Illumination
- 5.8. Climate and temperature
- 5.9. Motion and vibration
- 5.10. Complex systems
- 5.11. Other hazards in the workplace
- 5.12. Lack of manpower
- 5.13. Distractions and interruptions
6. Procedures, information, tools and practices
 - 6.1. Visual inspection
 - 6.2. Work logging and recording
 - 6.3. Procedure - practice/mismatch/norms
 - 6.4. Technical documentation - access and quality
 - 6.5. Critical maintenance tasks and error-capturing methods (independent inspection, reinspection, etc.)
7. Communication
 - 7.1. Shift/task handover
 - 7.2. Dissemination of information
 - 7.3. Cultural differences
8. Teamwork
 - 8.1. Responsibility
 - 8.2. Management, supervision and leadership
 - 8.3. Decision-making
9. Professionalism and integrity
 - 9.1. Keeping up to date; currency
 - 9.2. Avoiding error-provoking behaviour
 - 9.3. Assertiveness
10. Organisation's safety programme
 - 10.1. Safety policy and objectives, just culture principles
 - 10.2. Reporting errors and hazards, internal safety reporting scheme
 - 10.3. Investigation process

10.4. Action to address problems

10.5. Feedback and safety promotion

GM2 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

COMPETENCY ASSESSMENT ELEMENTS

An example of elements that may be considered during a competency assessment according to the job functions and the scope, size and complexity of the organisation, is given in the following table (not exhaustive):

	Managers	Planners	Supervisor	Certifying staff and support staff	Mechanics	Specialised Service staff	Compliance monitoring staff	Safety management personnel
Knowledge of applicable officially recognised standards						X	X	
Knowledge of auditing techniques: planning, conducting and reporting							X	X
Knowledge of safety management, human factors, human performance and limitations, and just culture	X	X	X	X	X	X	X	X
Knowledge of logistics processes	X	X	X					
Knowledge of organisation capabilities, privileges and limitations	X	X	X	X		X	X	X
Knowledge of Part-M, Part-ML, Part-145 and any other relevant regulations	X	X	X	X			X	X
Knowledge of relevant parts of the maintenance organisation exposition and procedures	X	X	X	X	X	X	X	X
Knowledge of occurrence reporting (mandatory and voluntary), internal reporting scheme and understanding of the importance of reporting occurrences, incorrect maintenance data and existing or potential defects	X	X	X	X	X	X		X
Knowledge of safety risks linked to the working environment	X	X	X	X	X	X	X	X
Knowledge of CDCCL when relevant	X	X	X	X	X	X	X	X
Knowledge of EWIS when relevant	X	X	X	X	X	X	X	X

	Managers	Planners	Supervisor	Certifying staff and support staff	Mechanics	Specialised Service staff	Compliance monitoring staff	Safety management personnel
Understanding of professional integrity, behaviour and attitude towards safety	X	X	X	X	X	X	X	X
Understanding of conditions for ensuring continuing airworthiness of aircraft and components				X			X	
Understanding of his or her own human performance and limitations	X	X	X	X	X	X	X	X
Understanding of personnel authorisations and limitations	X	X	X	X	X	X	X	
Understanding critical maintenance tasks	X	X	X	X	X		X	X
Ability to compile and control completed work cards		X	X	X				
Ability to consider human performance and limitations.	X	X	X	X			X	X
Ability to determine the required qualifications for task performance		X	X	X				
Ability to identify and rectify existing and potential unsafe conditions	X		X	X	X	X	X	X
Ability to manage third parties involved in maintenance activity	X	X	X					
Ability to confirm proper accomplishment of maintenance tasks			X	X	X	X		
Ability to identify and properly plan performance of critical maintenance tasks		X	X	X				
Ability to prioritise tasks and report discrepancies		X	X	X	X			
Ability to process the work requested by the operator		X	X	X				
Ability to promote the safety policy	X		X					X
Ability to properly process removed, uninstalled and rejected parts			X	X	X	X		
Ability to properly record and sign for work accomplished			X	X	X	X		
Ability to recognise the acceptability of parts to be installed prior to fitment			X	X	X			

	Managers	Planners	Supervisor	Certifying staff and support staff	Mechanics	Specialised Service staff	Compliance monitoring staff	Safety management personnel
Ability to split complex maintenance tasks into clear stages		X	X					
Ability to understand work orders, work cards and refer to and use applicable maintenance data		X	X	X	X	X	X	
Ability to use information systems	X	X	X	X	X	X	X	X
Ability to use, control and be familiar with the required tooling and/or equipment			X	X	X	X		
Adequate communication and literacy skills	X	X	X	X	X	X	X	X
Analytical and proven auditing skills (for example, objectivity, fairness, open-mindedness, determination, ...)							X	X
Maintenance error investigation skills							X	X
Resources management and production planning skills	X	X	X					
Teamwork, decision-making and leadership skills	X		X	X			X	X
Ability to encourage a positive safety culture and apply a just culture	X		X				X	X

GM3 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

TEMPLATE FOR RECORDING EXPERIENCE/TRAINING

The following template may be used to record the professional experience gained in an organisation and the training received and to be considered during the competency assessment of an individual in another organisation.

Aviation Maintenance personnel experience credential		
Name		Given name
Address		
Telephone		E-mail
Independent worker <input type="checkbox"/>		
Trade Group: airframe <input type="checkbox"/> engine <input type="checkbox"/> electric <input type="checkbox"/> avionics <input type="checkbox"/> other (specify) <input type="checkbox"/>		
Employer's details (when applicable)		
Name		
Address		
Telephone		
Maintenance organisation details		
Name		
Address		
Telephone		
Approval Number		
Period of employment	From:	To:
Domain of employment		
<input type="checkbox"/> Planning	<input type="checkbox"/> Engineering	<input type="checkbox"/> Technical records
<input type="checkbox"/> Store department	<input type="checkbox"/> Purchasing	
Mechanics/Technician		
<input type="checkbox"/> Line Maintenance	<input type="checkbox"/> Base Maintenance	<input type="checkbox"/> Component Maintenance
<input type="checkbox"/> Servicing	<input type="checkbox"/> Removal/installation	<input type="checkbox"/> Testing/inspection
<input type="checkbox"/> Scheduled Maintenance	<input type="checkbox"/> Inspection	<input type="checkbox"/> Repair
<input type="checkbox"/> Trouble-shooting	<input type="checkbox"/> Trouble-shooting	<input type="checkbox"/> Overhaul
	<input type="checkbox"/> Repair	<input type="checkbox"/> Re-treatment
		<input type="checkbox"/> Reassembly
A/C type	A/C type	Component type
Certifying Staff and support staff		
<input type="checkbox"/> Cat. A	<input type="checkbox"/> Cat. B1	<input type="checkbox"/> Cat. B2
<input type="checkbox"/> Cat. C	<input type="checkbox"/> Component type	<input type="checkbox"/> Other (e.g. NDT)
A/C Type	A/C Type	A/C Type
	Component Type	Specify
Certification privileges: Yes <input type="checkbox"/> / No <input type="checkbox"/>		
<input type="checkbox"/> Specialised services	Speciality (NDT, composites, welding, etc.):	
<input type="checkbox"/> Skilled personnel	Speciality (sheet metal, structures, wireman, upholstery, etc.):	
<input type="checkbox"/> Ground equipment operation		
<input type="checkbox"/> Supervision	<input type="checkbox"/> Compliance monitoring	<input type="checkbox"/> Training
<input type="checkbox"/> Safety investigation	<input type="checkbox"/> Safety management	
Total number of check boxes ticked:		<input type="checkbox"/>

Details of employment**Training received from the contracting organisation**

Date Nature of training

Certified by:

Name:

Date:

Position:

Signature:

Contact details:

Advisory note: A copy of the present credentials will be kept for at least 3 years from their issuance by the maintenance organisation.

GM4 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

COMPETENCY OF THE SAFETY MANAGER

The competency of a safety manager should include, but not be limited to, the following:

- (a) knowledge of ICAO standards and European requirements on safety management;
- (b) an understanding of management systems, including compliance monitoring systems;
- (c) an understanding of risk management;
- (d) an understanding of safety investigation techniques and root cause methodologies;
- (e) an understanding of human factors;
- (f) understanding and promotion of a positive safety culture;
- (g) operational experience related to the activities of the organisation;
- (h) safety management experience;
- (i) interpersonal and leadership skills, and the ability to influence staff;

- (j) oral and written communications skills;
- (k) data management, analytical and problem-solving skills.

GM5 145.A.30(e) Personnel requirements

ED Decision 2022/011/R

SAFETY TRAINING (INCLUDING HUMAN FACTORS)

- (a) The scope of the safety training and the related training programme will vary significantly depending on the size and complexity of the organisation. Safety training should reflect the evolving management system, and the changing roles of the personnel who make it work.
- (b) In recognition of this, training should be provided to management and staff at least:
 - (1) during the initial implementation of safety management processes;
 - (2) for all new staff or personnel recently allocated to safety management-related tasks;
 - (3) on a regular basis to refresh their knowledge and to understand changes to the management system;
 - (4) when changes in personnel affect safety management roles, and related accountabilities, responsibilities, and authorities; and

NOTE: In the context of safety management, the term 'authority' is used in relation to the level of management in the organisation that is necessary to make decisions related to risk tolerability.

 - (5) when performing dedicated safety functions in domains such as safety risk management, compliance monitoring, and internal investigations.
- (c) Safety training is subject to the record-keeping requirements in point [145.A.55\(d\)](#).

AMC 145.A.30(f) Personnel requirements

ED Decision 2021/009/R

1. Continued airworthiness non-destructive testing means such testing specified by the type certificate holder /aircraft or engine or propeller manufacturer in accordance with the maintenance data as specified in [145.A.45](#) for in service aircraft/aircraft components for the purpose of determining the continued fitness of the product to operate safely.
2. Appropriately qualified means to Level 1, 2 or 3 as defined by the European Standard EN 4179 dependent upon the non-destructive testing function to be carried out.
3. Notwithstanding the fact that Level 3 personnel may be qualified via EN 4179 to establish and authorise methods, techniques, etc., this does not permit such personnel to deviate from methods and techniques published in the maintenance data, unless the maintenance data expressly permits such deviation.
4. Notwithstanding the general references in EN 4179 to a national aerospace non-destructive testing (NDT) board, all examinations should be conducted by personnel or organisations under the general control of such a board. In the absence of a national aerospace NDT board, the aerospace NDT board of another Member State should be used, as defined by the competent authority.

5. Particular non-destructive test means any one or more of the following; Dye penetrant, magnetic particle, eddy current, ultrasonic and radiographic methods including X ray and gamma ray.
6. It should be noted that new methods are and will be developed, such as, but not limited to thermography and shearography, which are not specifically addressed by EN 4179. Until the time this agreed standard is established, such methods should be carried out in accordance with the particular equipment manufacturer's recommendations including any training and examination process to ensure competence of the personnel in the process.
7. Any maintenance organisation approved under [Part-145](#) that carries out NDT should establish NDT specialist qualification procedures detailed in the exposition and accepted by the competent authority.
8. Boroscoping and other techniques such as delamination coin tapping are non-destructive inspections rather than non-destructive testing. Notwithstanding such differentiation, the maintenance organisation should establish an exposition procedure accepted by the competent authority to ensure that personnel who carry out and interpret such inspections are properly trained and assessed for their competence in the process. Non-destructive inspections, not being considered as NDT by [Part-145](#) are not listed in Appendix II under class rating D1.
9. The referenced standards, methods, training and procedures should be specified in the maintenance organisation exposition.
10. Any such personnel who intend to carry out and/or control a non-destructive test for which they were not qualified prior to the effective date of [Part-145](#) should qualify for such non-destructive test in accordance with EN 4179.
11. In this context officially recognised standard means those standards established or published by an official body whether having legal personality or not, which are widely recognised by the air transport sector as constituting good practice.

AMC 145.A.30(g) Personnel requirements

ED Decision 2019/009/R

1. For the purposes of [66.A.20\(a\)\(1\)](#) and [66.A.20\(a\)\(3\)\(ii\)](#) personnel, minor scheduled line maintenance means any minor scheduled inspection/check up to and including a weekly check specified in the aircraft maintenance programme. For aircraft maintenance programmes that do not specify a weekly check, the competent authority will determine the most significant check that is considered equivalent to a weekly check.
2. Typical tasks permitted after appropriate task training to be carried out by the [66.A.20\(a\)\(1\)](#) and the [66.A.20\(a\)\(3\)\(ii\)](#) personnel for the purpose of these personnel issuing an aircraft certificate of release to service as specified in [145.A.50](#) as part of minor scheduled line maintenance or simple defect rectification are contained in the following list:
 - (a) Replacement of wheel assemblies.
 - (b) Replacement of wheel brake units.
 - (c) Replacement of emergency equipment.
 - (d) Replacement of ovens, boilers and beverage makers.
 - (e) Replacement of internal and external lights, filaments and flash tubes.
 - (f) Replacement of windscreen wiper blades.

- (g) Replacement of passenger and cabin crew seats, seat belts and harnesses.
- (h) Closing of cowlings and refitment of quick access inspection panels.
- (i) Replacement of toilet system components but excluding gate valves.
- (j) Simple repairs and replacement of internal compartment doors and placards but excluding doors forming part of a pressure structure.
- (k) Simple repairs and replacement of overhead storage compartment doors and cabin furnishing items.
- (l) Replacement of static wicks.
- (m) Replacement of aircraft main and APU aircraft batteries.
- (n) Replacement of in-flight entertainment system components other than public address.
- (o) Routine lubrication and replenishment of all system fluids and gases.
- (p) The de-activation only of sub-systems and aircraft components as permitted by the operator's minimum equipment list where such de-activation is agreed by the competent authority as a simple task.
- (q) Inspection for and removal of de-icing/anti-icing fluid residues, including removal/closure of panels, cowls or covers or the use of special tools.
- (r) Any other task agreed by the competent authority as a simple task for a particular aircraft type. This may include defect deferment when all the following conditions are met:
 - There is no need for troubleshooting; and
 - The task is in the MEL; and
 - The maintenance action required by the MEL is agreed by the competent authority to be simple.

In the particular case of helicopters, and in addition to the items above, the following:

- (s) removal and installation of Helicopter Emergency Medical Service (HEMS) simple internal medical equipment.
- (t) removal and installation of external cargo provisions (i.e., external hook, mirrors) other than the hoist.
- (u) removal and installation of quick release external cameras and search lights.
- (v) removal and installation of emergency float bags, not including the bottles.
- (w) removal and installation of external doors fitted with quick release attachments.
- (x) removal and installation of snow pads/skid wear shoes/slump protection pads.

No task which requires troubleshooting should be part of the authorised maintenance actions. Release to service after rectification of deferred defects should be permitted as long as the task is listed above.

3. The requirement of having appropriate aircraft-rated certifying staff qualified as category B1, B2, B2L, B3, L, as appropriate, in the case of aircraft line maintenance does not imply that the organisation must have B1, B2, B2L, B3 and L personnel at every line station. The MOE should have a procedure on how to deal with defects requiring those categories of certifying staff.

4. The competent authority may accept that in the case of aircraft line maintenance an organisation has only B1, B2, B2L, B3 or L certifying staff, as appropriate, provided that the competent authority is satisfied that the scope of work, as defined in the MOE, does not need the availability of all those categories of certifying staff. Special attention should be taken to clearly limit the scope of scheduled and non-scheduled line maintenance (defect rectification) to only those tasks that can be certified by the available category of certifying staff.

AMC1 145.A.30(h) Personnel requirements

ED Decision 2022/011/R

In accordance with points [145.A.30\(h\)](#) and [145.A.35](#), the qualification requirements (basic licence, aircraft ratings, recent experience and recurrent training) are identical for certifying staff and for support staff. The only difference is that support staff cannot hold certification privileges when performing this role since during base maintenance, the release to service will be issued by category C certifying staff.

Nevertheless, the organisation may use as support staff (for base maintenance) persons who already hold certification privileges for line maintenance.

AMC1 145.A.30(j)(4) Personnel requirements

ED Decision 2022/011/R

1. For the issue of a limited certification authorisation, the pilot should hold either an airline transport pilots licence (ATPL) or a commercial pilot licence (CPL) in accordance with Regulation (EU) No 1178/2011 and, as applicable, Regulation (EU) 2020/723.
2. In addition, the limited certification authorisation is subject to the MOE containing procedures to address the personnel requirements of point [145.A.30\(e\)](#). The procedures should be accepted by the competent authority and should include as a minimum:
 - (a) completion of adequate continuing airworthiness regulation training as related to maintenance;
 - (b) completion of adequate task training for the specific task(s) on the aircraft. The task training should be of sufficient duration to ensure that the individual has a thorough understanding of the task(s) to be completed, and that it will involve training in the use of the associated maintenance data;
 - (c) completion of the procedural training as specified in [Part-145](#).
- 2.(i) Typical tasks that may be certified and/or carried out by a pilot who holds an ATPL or a CPL are the minor maintenance or simple checks included in the following list:
 - (a) Replacement of internal lights, filaments and flash tubes;
 - (b) Closing of cowlings and refitment of quick-access inspection panels;
 - (c) Role changes, e.g. stretcher installation, dual controls, FLIR, doors, photographic equipment, etc.
 - (d) Inspection for, and removal of, de-icing/anti-icing fluid residues, including the removal/closure of panels, cowls or covers that are easily accessible, but that do not require the use of special tools;
 - (e) Any check/replacement that involves simple techniques that are consistent with this AMC and that have been agreed by the competent authority.

3. The validity of the authorisation should be limited to twelve months, and may be renewed if there has been satisfactory recurrent training on the task(s) for which the pilot holds an authorisation.

AMC1 145.A.30(j)(5) Personnel requirements

ED Decision 2022/011/R

1. For the purposes of point [145.A.30\(j\)\(5\)](#), ‘unforeseen’ means that the grounding of the aircraft could not reasonably have been predicted by the operator because the defect was unexpected, due to it being part of a hitherto reliable system.
2. Issuing a one-off authorisation should only be considered under the responsibility of the compliance monitoring manager of the contracted organisation after a reasoned judgement has been made that such an authorisation is appropriate under the circumstances, while at the same time it maintains the required airworthiness standards. The organisation’s compliance monitoring personnel should assess each situation individually prior to issuing a one-off authorisation, and may request contribution from technical and safety management personnel.
3. A one-off authorisation should not be issued if the level of certification required could exceed the knowledge and experience level of the person it is issued to. In all cases, due consideration should be given to the complexity of the work involved and the availability of the required tooling and/or test equipment needed to complete the work.

AMC 145.A.30(j)(5)(i) Personnel requirements

ED Decision 2022/011/R

In case it is necessary to issue a one-off certification authorisation to a certifying staff on an aircraft type for which he or she does not hold a type-rated authorisation, the following procedure is recommended:

1. The flight crew should communicate full details of the defect to the maintenance organisation. If necessary, the maintenance organisation will then request the use of a one-off authorisation from the compliance monitoring personnel.
2. When issuing a one-off authorisation, the compliance monitoring personnel should verify that:
 - (a) full technical details relating to the work required to be carried out have been established and passed on to the certifying staff;.
 - (b) the organisation has an approved procedure in place for coordinating and controlling the total maintenance activity undertaken at the location under the authority of the one-off authorisation;.
 - (c) the person to whom a one-off authorisation is issued has been provided with all the necessary information and guidance relating to maintenance data, and any special technical instructions associated with the specific task undertaken. A detailed step-by-step worksheet has been defined by the organisation, and has been communicated to the holder of the one-off authorisation;
 - (d) the person holds authorisations of equivalent levels and scopes on other aircraft types that have similar technology, construction and systems.

3. The holder of the one-off authorisation should sign off the detailed step-by-step worksheet when completing the work steps. The completed tasks should be verified by visual examination and/or normal system operation upon return to an appropriately approved [Part-145](#) maintenance facility.

AMC1 145.A.30(j)(5)(ii) Personnel requirements

ED Decision 2022/011/R

Point 145.A.30(j)(5)(ii) addresses the requirements for staff who are not employed by the maintenance organisation, but who meet the requirements of point [145.A.30\(j\)\(5\)](#). In addition to the items listed in points 1, 2(a), (b) and (c) and 3 of [AMC1 145.A.30\(j\)\(5\)\(i\)](#), the compliance monitoring personnel of the organisation may issue such a one-off authorisation provided that full details relating to the qualifications of the proposed certifying personnel are verified by the compliance monitoring personnel and made available at the location.

145.A.35 Certifying staff and support staff

Regulation (EU) 2018/1142

- (a) In addition to the requirements of points [145.A.30\(g\) and \(h\)](#), the organisation shall ensure that certifying staff and support staff have an adequate understanding of the relevant aircraft or components, or both, to be maintained and of the associated organisation procedures. In the case of certifying staff, this shall be accomplished before the issue or reissue of the certification authorisation.
 1. 'Support staff' means those staff holding an aircraft maintenance licence under [Annex III \(Part-66\)](#) in category B1, B2, B2L, B3 and/or L with the appropriate aircraft ratings, working in a base maintenance environment while not necessarily holding certification privileges.
 2. 'Relevant aircraft and/or components', means those aircraft or components specified in the particular certification authorisation.
 3. 'Certification authorisation' means the authorisation issued to certifying staff by the organisation and which specifies the fact that those staff may sign certificates of release to service within the limitations stated in such authorisation on behalf of the approved organisation.

Regulation (EU) 2018/1142

- (b) Except for the cases listed in points [145.A.30\(j\)](#) and [66.A.20\(a\)3\(ii\)](#), the organisation may only issue a certification authorisation to certifying staff in relation to the basic categories or subcategories and, except for the category A licence, any type rating listed on the aircraft maintenance licence as required by [Annex III \(Part-66\)](#), subject to the licence remaining valid throughout the validity period of the authorisation and to the certifying staff remaining in compliance with [Annex III \(Part-66\)](#).

Regulation (EU) No 1321/2014

- (c) The organisation shall ensure that all certifying staff and support staff are involved in at least 6 months of actual relevant aircraft or component maintenance experience in any consecutive 2-year period.

For the purpose of this point 'involved in actual relevant aircraft or component maintenance' means that the person has worked in an aircraft or component maintenance environment and has either exercised the privileges of the certification authorisation and/or has actually carried

out maintenance on at least some of the aircraft type or aircraft group systems specified in the particular certification authorisation.

Regulation (EU) 2021/1963

- (d) The organisation shall ensure that all certifying staff and support staff receive sufficient recurrent training in each 2-year period to ensure that they have up-to-date knowledge of relevant technologies, organisation procedures and safety management, including human factor issues.

Regulation (EU) 2021/1963

- (e) The organisation shall establish a programme for recurrent training for certifying staff and support staff, including a procedure to ensure compliance with the relevant provisions of this point and a procedure to ensure compliance with [Annex III \(Part-66\)](#).

Regulation (EU) 2021/1963

- (f) With the exception of the unforeseen cases specified in point [145.A.30\(j\)\(5\)](#), the organisation shall assess all certifying staff for their competency, qualifications and capability to carry out their intended certifying duties in accordance with a procedure in the MOE prior to the issue or reissue of a certification authorisation under this Annex to such staff.

Regulation (EU) No 1321/2014

- (g) When the conditions of points (a), (b), (d), (f) and, where applicable, point (c) have been fulfilled by the certifying staff, the organisation shall issue a certification authorisation that clearly specifies the scope and limits of such authorisation. Continued validity of the certification authorisation is dependent upon continued compliance with points (a), (b), (d), and where applicable, (c).

Regulation (EU) No 1321/2014

- (h) The certification authorisation must be in a style that makes its scope clear to the certifying staff and any authorised person who may require to examine the authorisation. Where codes are used to define scope, the organisation shall make a code translation readily available. 'Authorised person' means the officials of the competent authorities, the Agency and the Member State who has responsibility for the oversight of the maintained aircraft or component.

Regulation (EU) 2021/1963

- (i) The person or persons referred to in point [145.A.30\(c\)](#) that are responsible for the compliance monitoring function shall also remain responsible for issuing certification authorisations to certifying staff. That personnel may nominate other persons to effectively issue or revoke certification authorisations in accordance with a procedure in the MOE.

Regulation (EU) 2021/1963

- (j) The organisation shall provide certifying staff with a copy of their certification authorisation in either a documented or electronic format.

Regulation (EU) 2021/1963

- (k) Certifying staff shall produce their certification authorisation to any authorised person within 24 hours.

Regulation (EU) 2021/1963

- (l) The minimum age for certifying staff and support staff is 21 years.

Regulation (EU) 2021/1963

- (m) The holder of a category A aircraft maintenance licence may only exercise certification privileges on a specific aircraft type following the satisfactory completion of the relevant category A aircraft task training carried out by an organisation appropriately approved in accordance with [Annex II \(Part-145\)](#) or [Annex IV \(Part-147\)](#). This training shall include practical hands on training and theoretical training as appropriate for each task authorised. Satisfactory completion of training shall be demonstrated by an examination or by workplace assessment carried out by the organisation.

Regulation (EU) 2021/1963

- (n) The holder of a category B2 aircraft maintenance licence may only exercise the certification privileges described in point [66.A.20\(a\)\(3\)\(ii\)](#) of Annex III (Part-66) following the satisfactory completion of:
- (i) the relevant category A aircraft task training; and
 - (ii) 6 months of documented practical experience covering the scope of the authorisation that will be issued.

The task training shall include practical hands on training and theoretical training as appropriate for each task authorised. Satisfactory completion of training shall be demonstrated by an examination or by workplace assessment. Task training and examination/assessment shall be carried out by the maintenance organisation issuing the certifying staff authorisation. The practical experience shall be also obtained within such maintenance organisation.

AMC 145.A.35(a) Certifying staff and support staff

ED Decision 2022/011/R

1. Holding a [Part-66](#) licence with the relevant type/group rating, or a national qualification in the case of components, does not mean by itself that the holder is qualified to be authorised as certifying staff and/or support staff. The organisation is responsible for assessing the competency of the holder for the scope of the maintenance to be authorised.
2. The sentence 'the organisation shall ensure that certifying staff and support staff have an adequate understanding of the relevant aircraft and/or components to be maintained together with the associated organisation procedures' means that the person has received training and has been successfully assessed on:
 - the type of aircraft or component;
 - the differences on:
 - the particular model/variant;
 - the particular configuration.

The organisation should specifically ensure that the individual competencies have been established with regard to:

- relevant knowledge, skills and experience in the product type and configuration to be maintained, taking into account the differences between the generic aircraft type rating training that the person received and the specific configuration of the aircraft to be maintained.
- appropriate attitude towards safety and observance of procedures.

- knowledge of the associated organisation and operator procedures (i.e. handling and identification of components, MEL use, Technical Log use, independent checks, etc.).
3. Some special maintenance tasks may require additional specific training and experience, including but not limited to:
- in-depth troubleshooting;
 - very specific adjustment or test procedures;
 - rigging;
 - engine run-up, starting and operating the engines, checking engine performance characteristics, normal and emergency engine operation, associated safety precautions and procedures;
 - extensive structural/system inspection and repair;
 - other specialised maintenance required by the maintenance programme.
- For engine run-up training, simulators and/or real aircraft should be used.
4. The assessment of the competency of the holder should be conducted in accordance with a procedure approved by the competent authority (item 3.9 of the MOE, as described in [AMC1 145.A.70\(a\)](#)).
5. The organisation should hold copies of all the documents that attest to the competency and recent experience of the holder for the period described in point [145.A.55\(d\)\(4\)](#).

Additional information is provided in [AMC 66.A.20\(b\)3](#).

AMC 145.A.35(b) Certifying staff and support staff

ED Decision 2015/029/R

The organisation issues the certification authorisation when satisfied that compliance has been established with the appropriate paragraphs of [Part-145](#) and [Part-66](#). In granting the certification authorisation the maintenance organisation approved under Part-145 needs to be satisfied that the person holds a valid [Part-66](#) aircraft maintenance licence and may need to confirm such fact with the competent authority of the Member State that issued the licence.

AMC 145.A.35(c) Certifying staff and support staff

ED Decision 2015/011/R

For the interpretation of ‘6 months of actual relevant aircraft maintenance experience in any consecutive 2-year period’, the provisions of [AMC 66.A.20\(b\)2](#) are applicable.

AMC1 145.A.35(d) Certifying staff and support staff

ED Decision 2022/011/R

1. Recurrent training is a two-way process to ensure that certifying staff and support staff remain current in terms of the necessary technical knowledge, procedures, and safety management (including human factors), and that the organisation receives feedback on the adequacy of its procedures and maintenance instructions. Due to the interactive nature of this training, consideration should be given to involving the compliance monitoring staff and the key safety management personnel in this training to provide a consistent presence and facilitate feedback.

There should be a procedure to ensure that feedback is formally reported by the trainers through the internal safety reporting scheme to initiate action where necessary.

2. Recurrent training should cover changes made to the modification standard of the products being maintained, to the relevant requirements such as [Part-145](#), to the organisation's procedures, safety policy and objectives, as well as human factors and safety issues identified from internal or external analysis of incidents and compliance monitoring results. It should also address instances in which staff failed to follow the procedures, and the reasons why particular procedures were not always followed. In many cases, the recurrent training will reinforce the need to follow the procedures and will ensure that incomplete or incorrect procedures are identified to the company so that they can be corrected. It may be necessary to carry out an audit of these procedures.
3. Recurrent training should be of sufficient duration in each 2-year period to meet the intent of point [145.A.35\(d\)](#) and may be split into a number of separate elements. Point [145.A.35\(d\)](#) requires such a training to keep certifying staff and support staff updated in terms of relevant technology, procedures, safety management and human factors issues which means it is one part of ensuring compliance. Therefore, sufficient duration should be related to relevant audit findings and other internal / external sources of information available to the organisation on human errors and safety issues in maintenance. This means that in the case of an organisation that maintains aircraft with limited relevant audit findings, hazards and related safety risks identified, recurrent training could be limited to days rather than weeks, whereas in the case of a similar organisation with a number of relevant audit findings, hazards and related safety risks identified, such a training may take several weeks. For an organisation that maintains aircraft components, the duration of recurrent training would follow the same philosophy but should be scaled down to reflect the more limited nature of the activity. For example, certifying staff who release hydraulic pumps may only require a few hours of recurrent training, whereas those who release turbine engines may only require a few days of such a training. The content of recurrent training should be related to relevant audit findings, hazards and related safety risks identified. It is recommended that such training is reviewed at least once in every 24-month period.
4. The method of training is intended to be a flexible process, and this training could, for example, be provided by a [Part-147](#) organisation, an aeronautical college, the [Part-145](#) organisation, or another training or maintenance organisation. The elements, general content and length of such training should be specified in the MOE.

AMC1 145.A.35(e) Certifying staff and support staff

ED Decision 2022/011/R

The programme for recurrent training should list all certifying staff and support staff and when the training will take place, the elements of such a training, and an indication that it was carried out on time as planned. Such information should subsequently be transferred to the certifying staff and to the support staff records as required by point [145.A.55\(d\)\(3\)](#).

AMC1 145.A.35(f) Certifying staff and support staff

ED Decision 2022/011/R

As stated in point [145.A.35\(f\)](#), except where any of the unforeseen cases of point [145.A.30\(j\)\(5\)](#) applies, all prospective certifying staff and support staff should be assessed for their competency related to their intended duties. Said assessment should be conducted in accordance with AMC [1](#), [2](#), [3](#), [4](#) and [5](#) to point [145.A.30\(e\)](#), as applicable.

AMC1 145.A.35(m) Certifying staff and support staff

ED Decision 2022/011/R

1. It is the responsibility of the [Part-145](#) organisation issuing the category A certifying staff authorisation to ensure that the task training received by this person covers all the tasks to be authorised. This is particularly important in those cases where the task training has been provided by a [Part-147](#) organisation or by a Part-145 organisation different from the one issuing the authorisation.
2. 'Appropriately approved in accordance with [Annex IV \(Part-147\)](#)' means an organisation holding an approval to provide category A task training for the corresponding aircraft type.
3. 'Appropriately approved in accordance with [Annex II \(Part-145\)](#)' means an organisation holding a maintenance organisation approval for the corresponding aircraft type.

AMC1 145.A.35(n) Certifying staff and support staff

ED Decision 2022/011/R

1. The privilege for a B2 licence holder to release minor scheduled line maintenance and simple defect rectification in accordance with [66.A.20\(a\)\(3\)\(ii\)](#) can only be granted by the [Part-145](#) approved organisation where the licence holder is employed/contracted after meeting all the requirements specified in [145.A.35\(o\)](#). This privilege cannot be transferred to another [Part-145](#) approved organisation.
2. When a B2 licence holder already holds a certifying staff authorisation containing minor scheduled line maintenance and simple defect rectification for a particular aircraft type, new tasks relevant to category A can be added to that type without requiring another 6 months of experience. However, task training (theoretical plus practical hands-on) and examination/assessment for these additional tasks is still required.
3. When the certifying staff authorisation intends to cover several aircraft types, the experience may be combined within a single 6-month period.
4. For the addition of new types to the certifying staff authorisation, another 6 months should be required unless the aircraft is considered similar per [AMC 66.A.20\(b\)\(2\)](#) to the one already held.
5. The term '6 months of experience' may include full-time employment or part-time employment. The important aspect is that the person has been involved during a period of 6 months (not necessarily every day) in those tasks which are going to be part of the authorisation.

145.A.37 Airworthiness review staff

Regulation (EU) 2021/1963

- (a) In order to be approved to carry out airworthiness reviews and to issue the corresponding airworthiness review certificates (ARC) for aircraft covered by [Annex Vb \(Part-ML\)](#), the organisation shall have airworthiness review staff that comply with all of the following requirements:
 - (1) they have acquired experience in continuing airworthiness of at least 1 year for sailplanes and balloons and of at least 3 years for all other aircraft;
 - (2) they hold a certifying staff authorisation for the corresponding aircraft;
 - (3) they have acquired knowledge of [Annex I \(Part-M\), Subpart C](#), or of [Annex Vb \(Part-ML\), Subpart C](#);

- (4) they have acquired knowledge of the procedures of the maintenance organisation relevant to the airworthiness review and issue of the airworthiness review certificate.
- (b) Before the organisation issues an airworthiness review authorisation to a candidate, that person shall perform an airworthiness review under the supervision of the competent authority or under the supervision of a person that is already authorised as airworthiness review staff by the organisation. If this airworthiness review under supervision is satisfactory, the competent authority shall formally accept that person to become airworthiness review staff.
- (c) The organisation shall ensure that the airworthiness review staff can demonstrate appropriate recent continuing airworthiness experience.

AMC1 145.A.37 Airworthiness review staff

ED Decision 2022/011/R

- (a) ‘Experience in continuing airworthiness’ in [145.A.37\(a\)\(1\)](#) refers to any appropriate combination of experience in tasks related to aircraft maintenance and/or continuing airworthiness management and/or surveillance of such tasks.
- (b) ‘Appropriate recent continuing airworthiness experience’ in [145.A.37\(c\)](#) refers to the fact that in order to keep the validity of the airworthiness review staff authorisation, the airworthiness review staff should have either:
- (1) been involved in continuing airworthiness management activities for at least 6 months in every 2-year period; or
 - (2) conducted at least one airworthiness review in the last 12-month period.
- (c) In order to restore the validity of the authorisation, the airworthiness review staff should conduct at a satisfactory level an airworthiness review under the supervision of the competent authority or, if accepted by the competent authority, under the supervision of another currently authorised airworthiness review staff of the organisation concerned in accordance with an approved procedure.

GM1 145.A.37(b) Airworthiness review staff

ED Decision 2022/011/R

ACCEPTANCE AND AUTHORISATION OF AIRWORTHINESS REVIEW STAFF (ARS)

The process of acceptance and authorisation of a new ARS within a [Part-145](#) organisation includes the following steps (the order of certain steps may vary):

- The organisation verifies the compliance of the candidate ARS with point [145.A.37\(a\)](#);
- The candidate ARS is assessed while performing an airworthiness review (AR) under supervision (supervision by the competent authority or supervision by an ARS already authorised by the organisation) ([145.A.37\(b\)](#));
- The organisation submits an application for change (requiring prior approval) to the competent authority (ref. [145.A.85](#)) together with the proposed amendment to the MOE (candidate ARS introduced in the list of ARS — ref. [145.A.70\(a\)\(6\)](#));
- Based on the results of the AR and its supervision, the competent authority accepts the candidate (regardless of whether the supervision was done by the competent authority or by the organisation);
- The competent authority approves the MOE;

- The organisation issues the AR authorisation to the ARS.

145.A.40 Equipment and tools

Regulation (EU) 2018/1142

- (a) The organisation shall have available and use the necessary equipment and tools to perform the approved scope of work.
 - (i) Where the manufacturer specifies a particular tool or equipment, the organisation shall use that tool or equipment, unless the use of alternative tooling or equipment is agreed by the competent authority via procedures specified in the exposition.
 - (ii) Equipment and tools must be permanently available, except in the case of any tool or equipment that is so infrequently used that its permanent availability is not necessary. Such cases shall be detailed in an exposition procedure.
 - (iii) An organisation approved for base maintenance shall have sufficient aircraft access equipment and inspection platforms/docking as required for the proper inspection of the aircraft.
- (b) The organisation shall ensure that all tools, equipment and particularly test equipment, as appropriate, are controlled and calibrated according to an officially recognised standard at a frequency to ensure serviceability and accuracy. Records of such calibrations and traceability to the standard used shall be kept by the organisation.

AMC 145.A.40(a) Equipment and tools

ED Decision 2019/009/R

Once the applicant for approval has determined the intended scope of work for consideration by the competent authority, it will be necessary to show that all tools and equipment as specified in the maintenance data can be made available when needed. All such tools and equipment that require to be controlled in terms of servicing or calibration by virtue of being necessary to measure specified dimensions and torque figures, etc., should be clearly identified and listed in a control register including any personal tools and equipment that the organisation agrees can be used.

AMC 145.A.40(b) Equipment and tools

ED Decision 2019/009/R

1. The control of these tools and equipment requires that the organisation has a procedure to inspect/service and, where appropriate, calibrate such items on a regular basis and indicate to users that the item is within any inspection or service or calibration time-limit. A clear system of labelling all tooling, equipment and test equipment is therefore necessary giving information on when the next inspection or service or calibration is due and if the item is unserviceable for any other reason where it may not be obvious. A register should be maintained for all precision tooling and equipment together with a record of calibrations and standards used.
2. Inspection, service or calibration on a regular basis should be in accordance with the equipment manufacturers' instructions except where the organisation can show by results that a different time period is appropriate in a particular case.
3. In this context officially recognised standard means those standards established or published by an official body whether having legal personality or not, which are widely recognised by the air transport sector as constituting good practice.

145.A.42 Components

Regulation (EU) 2021/700

- (a) Classification of components. All components shall be classified into the following categories:
- (i) Components which are in a satisfactory condition, released on an [EASA Form 1](#) or equivalent and marked in accordance with Subpart Q of Annex I (Part 21) to Regulation (EU) No 748/2012, unless otherwise specified in point 21.A.307 of Annex I (Part 21) to Regulation (EU) No 748/2012, in point [M.A.502](#) of Annex I (Part-M), in point [ML.A.502](#) of Annex III (Part-ML), or in this Annex (Part-145).
 - (ii) Unserviceable components which shall be maintained in accordance with this Regulation.
 - (iii) Components categorised as unsalvageable because they have reached their mandatory life limitation or contain a non-repairable defect.
 - (iv) Standard parts used on an aircraft, engine, propeller or other aircraft component when specified in the maintenance data and accompanied by evidence of conformity traceable to the applicable standard.
 - (v) Material, both raw and consumable, used in the course of maintenance when the organisation is satisfied that the material meets the required specification and has appropriate traceability. All material shall be accompanied by documentation clearly relating to the particular material and containing a conformity to specification statement as well as the manufacturing and supplier source.
- (b) Components, standard parts and materials for installation
- (i) The organisation shall establish procedures for the acceptance of components, standard parts and materials for installation to ensure that components, standard parts and materials are in satisfactory condition and meet the applicable requirements of point (a).
 - (ii) The organisation shall establish procedures to ensure that components, standard parts and materials shall only be installed on an aircraft or a component when they are in satisfactory condition, meet the applicable requirements of point (a) and the applicable maintenance data specifies the particular component, standard part or material.
 - (iii) The organisation may fabricate a restricted range of parts to be used in the course of undergoing work within its own facilities, provided procedures are identified in the exposition.
 - (iv) Components which are referred to in point (b)(2) of point 21.A.307 of Annex I (Part 21) to Regulation (EU) No 748/2012 shall only be installed if considered eligible for installation by the aircraft owner on their own aircraft.
- (c) Segregation of components
- (i) Unserviceable and unsalvageable components shall be segregated from serviceable components, standards parts and materials.
 - (ii) Unsalvageable components shall not be permitted to re-enter the component supply system, unless mandatory life limitation have been extended or a repair solution has been approved in accordance with Regulation (EU) No 748/2012.

AMC1 145.A.42(a)(i) Components

ED Decision 2021/009/R

EASA FORM 1 OR EQUIVALENT

A document equivalent to an [EASA Form 1](#) may be:

- (a) a release document issued by an organisation under the terms of a bilateral agreement signed by the European Union;
- (b) a release document issued by an organisation approved under the terms of a JAA bilateral agreement until superseded by the corresponding agreement signed by the European Union;
- (c) a JAA Form One issued prior to 28 November 2004 by a JAR 145 organisation approved by a JAA Full Member State;
- (d) in the case of new aircraft components that were released from manufacturing prior to the Part 21 compliance date, the component should be accompanied by a JAA Form One issued by a JAR 21 organisation approved by a JAA Full Member State and within the JAA mutual recognition system;
- (e) a JAA Form One issued prior to 28 September 2005 by a production organisation approved by a competent authority in accordance with its national regulations.
- (f) a 'declaration of maintenance accomplished' issued by the person or organisation that performed the maintenance, as specified in point [M.A.502\(e\)](#) or in point [ML.A.502\(c\)](#).

GM1 145.A.42(a)(i) Components

ED Decision 2021/009/R

Point (b) of 21.A.307 specifies the new components that do not need an EASA Form 1 or equivalent to be eligible for installation. Point (c) of 21.A.307 specifies the conditions for the document accompanying the component.

AMC1 145.A.42(a)(ii) Components

ED Decision 2020/002/R

UNSERVICEABLE COMPONENTS

- (a) The organisation should ensure the proper identification of any unserviceable components. The unserviceable status of the component should be clearly declared on a tag together with the component identification data and any information that is useful to define actions that are necessary to be taken. Such information should state, as applicable, in-service times, maintenance status, preservation status, failures, defects or malfunctions reported or detected, exposure to adverse environmental conditions, and whether the component is installed on an aircraft that was involved in an accident or incident. Means should be provided to prevent unintentional separation of this tag from the component.
- (b) Unserviceable components should typically undergo maintenance due to:
 - (1) expiry of the service life limit as defined in the aircraft maintenance programme;
 - (2) non-compliance with the applicable airworthiness directives and other continuing airworthiness requirements mandated by the Agency;
 - (3) absence of the necessary information to determine the airworthiness status or eligibility for installation;

- (4) evidence of defects or malfunctions; or
- (5) being installed on an aircraft that was involved in an incident or accident likely to affect the component's serviceability.

AMC1 145.A.42(a)(iii) Components

ED Decision 2020/002/R

UNRECOVERABLE COMPONENTS

The following types of components should typically be classified as unrecoverable:

- (a) components with non-repairable defects, whether visible or not to the naked eye;
- (b) components that do not meet design specifications, and cannot be brought into conformity with such specifications;
- (c) components subjected to unacceptable modification or rework that is irreversible;
- (d) parts with mandatory life limitations that have reached or exceeded these limitations, or have missing or incomplete records;
- (e) components whose airworthy condition cannot be restored due to exposure to extreme forces, heat or adverse environmental conditions;
- (f) components for which conformity with an applicable airworthiness directive cannot be accomplished;
- (g) components for which maintenance records and/or traceability to the manufacturer cannot be retrieved.

AMC1 145.A.42(a)(iv) Components

ED Decision 2019/009/R

STANDARD PARTS

- (a) Standard parts are parts that are manufactured in complete compliance with an established industry, Agency, competent authority or other government specification which includes design, manufacturing, test and acceptance criteria, and uniform identification requirements. The specification should include all the information that is necessary to produce and verify conformity of the part. It should be published so that any party may manufacture the part. Examples of specifications are National Aerospace Standards (NAS), Army-Navy Aeronautical Standard (AN), Society of Automotive Engineers (SAE), SAE Sematec, Joint Electron Device Engineering Council, Joint Electron Tube Engineering Council, and American National Standards Institute (ANSI), EN Specifications, etc.
- (b) To designate a part as a standard part, the TC holder may issue a standard parts manual accepted by the competent authority of the original TC holder or may make reference in the parts catalogue to the specification to be met by the standard part. Documentation that accompanies standard parts should clearly relate to the particular parts and contain a conformity statement plus both the manufacturing and supplier source. Some materials are subject to special conditions, such as storage conditions or life limitation, etc., and this should be included in the documentation and/or the material's packaging.
- (c) An [EASA Form 1](#) or equivalent is not normally issued and, therefore, none should be expected.

AMC2 145.A.42(a)(iv) Components

ED Decision 2019/009/R

STANDARD PARTS

For sailplanes and powered sailplanes, non-required instruments and/or equipment that are certified under the provision of CS 22.1301(b), if those instruments or equipment, when installed, functioning, functioning improperly or not functioning at all, do not in themselves, or by their effect upon the sailplane and its operation, constitute a safety hazard.

‘Required’ in the term ‘non-required’, as used above, means required by the applicable airworthiness code (CS 22.1303, 22.1305 and 22.1307) or required by the relevant regulations for air operations and the applicable Rules of the Air or as required by air traffic management (e.g. a transponder in certain controlled airspace). Examples of non-required equipment which can be considered to be standard parts may be electrical variometers, bank/slip indicators ball-type, total energy probes, capacity bottles (for variometers), final glide calculators, navigation computers, data logger/barograph/turnpoint camera, bug-wipers and anti-collision systems. Equipment which must be approved in accordance with the airworthiness code shall comply with the applicable ETSO or equivalent and it is not considered to be a standard part (e.g. oxygen equipment).

AMC1 145.A.42(a)(v) Components

ED Decision 2019/009/R

MATERIAL

- (a) Consumable material is any material which is only used once, such as lubricants, cements, compounds, paints, chemical dyes and sealants, etc.
- (b) Raw material is any material that requires further work to make it into a component part of the aircraft, such as metal, plastic, wood, fabric, etc.
- (c) Material both raw and consumable should only be accepted when satisfied that it is to the required specification. To be satisfied, the material and/or its packaging should be marked with the applicable specification and, where appropriate, the batch number.
- (d) Documentation that accompanies all materials should clearly relate to the particular material and contain a conformity statement plus both the manufacturing and supplier source. Some materials are subject to special conditions, such as storage conditions or life limitation, etc., and this should be included in the documentation and/or the material’s packaging.
- (e) An [EASA Form 1](#) or equivalent should not be issued for such materials and, therefore, none should be expected. The material specification is normally identified in the (S)TC holder’s data except in the case where the Agency or the competent authority has agreed otherwise.

GM1 145.A.42(b) Components

ED Decision 2020/002/R

Used components maintained by a CAO appropriately approved for component maintenance and released on an EASA Form 1 cannot be installed on complex motor-powered aircraft or aircraft used by an air carrier licensed in accordance with Regulation (EC) No 1008/2008.

AMC1 145.A.42(b)(i) Components

ED Decision 2019/009/R

ACCEPTANCE OF COMPONENTS FOR INSTALLATION

- (a) The procedures for the acceptance of components, standard parts and materials should have the objective of ensuring that the components, standard parts and materials are in satisfactory condition and meet the organisation's requirements. These procedures should be based upon incoming inspections which include:
 - (1) physical inspection of the components, standard parts and materials;
 - (2) review of the accompanying documentation and data, which should be acceptable in accordance with [145.A.42\(a\)](#).
- (b) For the acceptance of components, standard parts and materials from suppliers, the above procedures should include supplier evaluation procedures.

GM1 145.A.42(b)(i) Components

ED Decision 2019/009/R

INCOMING PHYSICAL INSPECTION

- (a) To ensure that components, standard parts and materials are in satisfactory condition, the organisation should perform incoming physical inspections.
- (b) The incoming physical inspection should be performed before the component is installed on the aircraft.
- (c) The following list, although not exhaustive, contains typical checks to be performed:
 - (1) verify the general condition of the components and their packaging in relation to damages that could affect their integrity;
 - (2) verify that the shelf life of the component has not expired;
 - (3) verify that items are received in the appropriate package in respect of the type of the component: e.g. correct ATA 300 or electrostatic sensitive devices packaging, when necessary;
 - (4) verify that the component has all plugs and caps appropriately installed to prevent damage or internal contamination. Care should be taken when tape is used to cover electrical connections or fluid fittings/openings because adhesive residues can insulate electrical connections and contaminate hydraulic or fuel units.
- (d) Items (fasteners, etc.) purchased in batches should be supplied in a package. The packaging should state the applicable specification/standard, part number, batch number, and the quantity of the items. The documentation that accompanies the material should contain the applicable specification/standard, part number, batch number, supplied quantity, and the manufacturing sources. If the material is acquired from different batches, acceptance documentation for each batch should be provided.

GM2 145.A.42(b)(i) Components

ED Decision 2019/009/R

EXAMPLES OF SUPPLIERS

A supplier could be any source that provides components, standard parts or materials to be used for maintenance. Possible sources could be: Part-145 organisations, Part 21 Subpart G organisations, operators, stockist, distributors, brokers, aircraft owners/lessees, etc.

GM3 145.A.42(b)(i) Components

ED Decision 2019/009/R

SUPPLIER EVALUATION

- (a) The following elements should be considered for the initial and recurrent evaluation of a supplier's quality system to ensure that the component and/or material is supplied in satisfactory condition:
- (1) availability of appropriate up-to-date regulations, specifications (such as component handling/storage data) and standards;
 - (2) standards and procedures for the training of personnel and competency assessment;
 - (3) procedures for shelf-life control;
 - (4) procedures for handling of electrostatic sensitive devices;
 - (5) procedures for identifying the source from which components and materials were received;
 - (6) purchasing procedures that identify documentation to accompany components and materials for subsequent use by approved Part-145 maintenance organisations;
 - (7) procedures for incoming inspection of components and materials;
 - (8) procedures for control of measuring equipment that provide for appropriate storage, usage, and for calibration when such equipment is required;
 - (9) procedures to ensure appropriate storage conditions for components and materials that are adequate to protect the components and materials from damage and/or deterioration. Such procedures should comply with the manufacturers' recommendations and relevant standards;
 - (10) procedures for adequate packing and shipping of components and materials to protect them from damage and deterioration, including procedures for proper shipping of dangerous goods (e.g. ICAO and ATA specifications);
 - (11) procedures for detecting and reporting of suspected unapproved components;
 - (12) procedures for handling unsalvageable components in accordance with applicable regulations and standards;
 - (13) procedures for batch splitting or redistribution of lots and handling of the related documents;
 - (14) procedures for notifying purchasers of any components that have been shipped and have later been identified as not conforming to the applicable technical data or standard;
 - (15) procedures for recall control to ensure that components and materials shipped can be traced and recalled if necessary;

- (16) procedures for monitoring the effectiveness of the quality system.
- (b) Suppliers which are certified to officially recognised standards that have a quality system that includes the elements specified in (a) may be acceptable; such standards include:
- (1) EN/AS9120 and listed in the OASIS database;
 - (2) ASA-100;
 - (3) EASO 2012;
 - (4) FAA AC 00-56.
- The use of such suppliers does not exempt the organisation from its obligations under [145.A.42](#) to ensure that supplied components and materials are in satisfactory condition and meet the applicable criteria of 145.A.42.
- (c) Supplier evaluation may depend on different factors, such as the type of component, whether or not the supplier is the manufacturer of the component, the TC holder or a maintenance organisation, or even specific circumstances such as aircraft on ground. This evaluation may be limited to a questionnaire from the Part-145 organisation to its suppliers, a desktop evaluation of the supplier's procedures or an on-site audit, if deemed necessary.

GM1 145.A.42(b)(ii) Components

ED Decision 2021/009/R

INSTALLATION OF COMPONENTS

Components, standard parts and materials should only be installed when they are specified in the applicable maintenance data as specified in [145.A.45\(b\)](#). So, the installation of a component, standard part or material can only be done after checking the applicable maintenance data.

This check should ensure that the part number, modification status, limitations, etc., of the component, standard part or material are the ones specified in the applicable maintenance data of the particular aircraft or component where the component, standard part or material is going to be installed. The organisation should establish procedures to ensure that this check is performed before installation.

AMC1 145.A.42(b)(iii) Components

ED Decision 2019/009/R

FABRICATION OF PARTS FOR INSTALLATION

- (a) The agreement of the competent authority on the fabrication of parts by the approved maintenance organisation should be formalised through the approval of a detailed procedure in the Maintenance Organisation Exposition (MOE). This AMC contains principles and conditions to be taken into account for the preparation of an acceptable procedure.
- (b) Fabrication, inspection, assembly and test should be clearly within the technical and procedural capability of the organisation.
- (c) All necessary data to fabricate the part should be approved either by the Agency or the type certificate (TC) holder, or Part 21 design organisation approval holder, or supplemental type certificate (STC) holder.

- (d) Items that are fabricated by an organisation approved under Part-145 may only be used by that organisation in the course of overhaul, maintenance, modifications, or repair of aircraft or components, performing work at its own facilities. The permission to fabricate does not constitute approval for manufacture, or to supply externally, and the parts do not qualify for [EASA Form 1](#) certification. This prohibition also applies to the bulk transfer of surplus inventory, in that locally fabricated parts are physically segregated and excluded from any delivery certification.
- (e) Fabrication of parts, modification kits, etc., for onward supply and/or sale may not be conducted by an organisation that is approved under Part-145.
- (f) The data specified in (c) may include repair procedures that involve the fabrication of parts. Where the data on such parts is sufficient to facilitate fabrication, the parts may be fabricated by an organisation that is approved under Part-145. Care should be taken to ensure that the data include details of part numbering, dimensions, materials, processes, and any special manufacturing techniques, special raw material specification and/or incoming inspection requirement, and that the approved organisation has the necessary capability to fabricate those parts. That capability should be defined by way of exposition content. Where special processes or inspection procedures are defined in the approved data which are not available at the organisation, the organisation cannot fabricate the part unless the TC/STC holder gives an approved alternative.
- (g) Examples of fabrication within the scope of a Part-145 approval may include but are not limited to the following:
- (1) fabrication of bushes, sleeves and shims;
 - (2) fabrication of secondary structural elements and skin panels;
 - (3) fabrication of control cables;
 - (4) fabrication of flexible and rigid pipes;
 - (5) fabrication of electrical cable looms and assemblies;
 - (6) formed or machined sheet metal panels for repairs.

All the above-mentioned fabricated parts should be in accordance with the data provided in the overhaul or repair manuals, modification schemes and service bulletins, drawings, or should be otherwise approved by the competent authority.

Note: It is not acceptable to fabricate any item to pattern unless an engineering drawing of the item is produced which includes any necessary fabrication process and which is acceptable to the competent authority.

- (h) Where a TC holder or an approved production organisation is prepared to make available complete data which is not referred to in the aircraft manuals or service bulletins but provides manufacturing drawings for items specified in parts lists, the fabrication of these items is not considered to be within the scope of an approval unless agreed otherwise by the competent authority in accordance with a procedure specified in the exposition.
- (i) Inspection and identification
- Any locally fabricated part should be subject to inspection before, separately, and preferably independently from any inspection of its installation. The inspection should establish full compliance with the relevant manufacturing data, and the part should be unambiguously identified as fit for use by stating conformity to the approved data. Adequate records should be maintained of all such fabrication processes including heat treatment and final inspections. All

parts, except those that do not have enough space, should carry a part number which clearly relates it to the manufacturing/inspection data. In addition to the part's number, the organisation's identity should be marked on the part for traceability purposes.

AMC1 145.A.42(c) Components

ED Decision 2019/009/R

SEGREGATION OF COMPONENTS

- (a) Unserviceable components should be identified and stored in a secure location that is under the control of the maintenance organisation until a decision is made on the future status of such components. The organisation that declared the component to be unserviceable may transfer its custody after identifying it as unserviceable to the aircraft owner provided that such transfer is reflected in the aircraft logbook, or engine logbook, or component logbook.
- (b) 'Secure location under the control of an approved maintenance organisation' refers to a secure location whose security is the responsibility of the approved maintenance organisation. This may include facilities that are established by the organisation at locations different from the main maintenance facilities. These locations should be identified in the relevant procedures of the organisation.
- (c) In the case of unsalvageable components, the organisation should:
 - (1) retain such component in the secure location referred to in paragraph (b);
 - (2) arrange for the component to be mutilated in a manner that ensures that they are beyond economic salvage or repair before disposing it; or
 - (3) mark the component indicating that it is unsalvageable, when in agreement with the component owner, the component is disposed of for legitimate non-flight uses (such as training and education aids, research and development), or for non-aviation applications, mutilation is often not appropriate. Alternatively to marking, the original part number or data plate information can be removed or a record kept of the disposal of the components.

GM1 145.A.42(c)(i) Components

ED Decision 2019/009/R

MUTILATION OF COMPONENTS

- (a) Mutilation should be accomplished in such a manner that the components become permanently unusable for their originally intended use. Mutilated components should not be able to be reworked or camouflaged to provide the appearance of being serviceable, such as by replating, shortening and rethreading long bolts, welding, straightening, machining, cleaning, polishing, or repainting.
- (b) Mutilation may be accomplished by one or a combination of the following procedures:
 - (1) grinding;
 - (2) burning;
 - (3) removal of a major lug or other integral feature;
 - (4) permanent distortion of parts;
 - (5) cutting a hole with cutting torch or saw;

- (6) melting;
 - (7) sawing into many small pieces; and
 - (8) any other method accepted by the competent authority.
- (c) The following procedures are examples of mutilation that are often less successful because they may not be consistently effective:
- (1) stamping or vibro-etching;
 - (2) spraying with paint;
 - (3) small distortions, incisions, or hammer marks;
 - (4) identification by tags or markings;
 - (5) drilling small holes; and
 - (6) sawing in two pieces only.

145.A.45 Maintenance data

Regulation (EU) 2021/1963

- (a) The organisation shall hold and use applicable current maintenance data which is necessary in the performance of maintenance, including modifications and repairs. “Applicable” means relevant to any aircraft, component or process specified in the organisation’s terms of approval and in any associated capability list.
- In the case of maintenance data provided by the person or organisation requesting the maintenance, the organisation shall hold such data when the work is in progress, with the exception of the need to comply with point [145.A.55\(a\)\(3\)](#).
- (b) Applicable maintenance data is the data specified in point [M.A.401\(b\)](#) of Annex I (Part-M) or in point [ML.A.401\(b\)](#) of Annex Vb (Part-ML), as applicable.
- (c) The organisation shall establish procedures to ensure that if inaccurate, incomplete or ambiguous procedure, practice, information or maintenance instruction is found in the maintenance data used by maintenance personnel, it is recorded as part of the internal safety reporting scheme referred to in point [145.A.202](#) and notified to the author of the maintenance data.
- (d) The organisation may only modify maintenance instructions in accordance with a procedure that is specified in the MOE. With respect to changes to maintenance instructions, the organisation shall demonstrate that they result in equivalent or improved maintenance standards, and shall inform the author of the maintenance instructions of such changes. For the purposes of this point, “maintenance instructions” mean instructions on how to carry out a particular maintenance task; they exclude the engineering design of repairs and modifications.
- (e) The organisation shall provide a common work card or worksheet system to be used throughout the relevant parts of the organisation. In addition, the organisation shall either accurately transcribe the maintenance data referred to in points (b) and (d) onto such work cards or worksheets, or make precise reference to the particular maintenance task or tasks contained in that maintenance data. Work cards and worksheets may be computer generated and held in an electronic database that is adequately protected against unauthorised alteration, and for which there is a backup electronic database which shall be updated within 24 hours after an entry is made to the main electronic database. Complex or long maintenance tasks shall be transcribed

onto the work cards or worksheets and subdivided into clear stages to ensure that there is a record of the accomplishment of the complete maintenance task.

When the organisation provides maintenance services to an aircraft operator which requires its own work card or worksheet system to be used, then such work card or worksheet system may be used. In that case, the organisation shall establish a procedure to ensure that those work cards or worksheets are correctly completed.

- (f) The organisation shall ensure that all applicable maintenance data is readily available for use when required by maintenance personnel.
- (g) The organisation shall establish a procedure to ensure that maintenance data it controls is kept up to date. In the case of operator/customer controlled and provided maintenance data, the organisation shall be able to show that either it has written confirmation from the operator/customer that all such maintenance data is up to date or it has work orders specifying the amendment status of the maintenance data to be used or it can show that it is on the operator/customer maintenance data amendment list.

GM1 145.A.45(b) Maintenance data

ED Decision 2021/009/R

The provisions of [GM1 M.A.401\(b\)\(3\) and \(b\)\(4\)](#), [GM1 M.A.401\(b\)\(4\)](#) and [GM1 ML.A.401\(b\)](#) apply.

AMC1 145.A.45(c) Maintenance data

ED Decision 2022/011/R

1. The referenced procedure should ensure that when maintenance personnel discover inaccurate, incomplete or ambiguous information in the maintenance data, they should record the details as part of the internal safety reporting scheme specified in point [145.A.202](#). The procedure should then ensure that the [Part-145](#) approved maintenance organisation notifies the problem to the author of the maintenance data in a timely manner. A record of such communications to the author of the maintenance data should be retained by the [Part-145](#) approved organisation until such time as the author of the maintenance data has clarified the issue by e.g. amending the maintenance data.
2. The referenced procedure should be specified in the MOE.

AMC1 145.A.45(d) Maintenance data

ED Decision 2022/011/R

The referenced procedure should address the need for a practical demonstration by the maintenance personnel proposing the change to the compliance monitoring personnel, of the modified maintenance instruction. Depending on the nature of the maintenance instruction modification, a risk assessment may be required to demonstrate that an equivalent or improved maintenance standard is reached. When satisfied, the compliance monitoring personnel should approve the modified maintenance instruction, and ensure that the author of the maintenance instruction is informed of the modified maintenance instruction. The procedure should include a paper/electronic traceability of the complete process from start to finish, and ensure that the relevant maintenance instruction clearly identifies the modification. Modified maintenance instructions should only be used in the following circumstances:

- (a) Where the original intent of the maintenance instruction can be carried out in a more practical or more efficient manner.

- (b) Where the original intent of the maintenance instruction cannot be achieved when following the maintenance instructions. For example, where a component cannot be replaced following the original maintenance instructions.
- (c) For the use of alternative tools / equipment.

Important Note: Critical Design Configuration Control Limitations (CDCCL) are airworthiness limitations. Any modification of the maintenance instructions linked to CDCCL constitutes a change to a (restricted) type certificate that should be approved in accordance with Part-21.

AMC1 145.A.45(e) Maintenance data

ED Decision 2022/011/R

1. 'The relevant parts of the organisation' means, as appropriate, aircraft base maintenance, aircraft line maintenance, specialised services, component workshops such as engine workshops, mechanical workshops or avionics workshops. Therefore, a common system should be used, for example, throughout the engine workshops, which may be different from that in the aircraft base maintenance.
2. The work cards should differentiate and specify, when relevant, disassembly, accomplishment of tasks, reassembly and testing as well as the error-capturing method (e.g. independent inspection). In the case of a lengthy maintenance task involving a succession of personnel to complete such a task, it may be necessary to use supplementary work cards or worksheets to indicate what was actually accomplished by each individual person.
3. With reference to point [145.A.65\(a\)](#), human factors should be taken into account during the development of work cards and worksheets.
4. 'Complex or long maintenance tasks' refers to tasks involving multiple disciplines or multiple shifts, or multiple zones/access opening, special tools, etc., or a combination of these.

The stages into which the work cards are to be subdivided should refer to where work can be interrupted. Subdivision should also indicate when a different discipline continues to work if no separate work cards are provided.

5. Where required by the operator/CAMO/CAO to use their work card or worksheet system, the maintenance organisation should assess the system for compliance with the maintenance organisation procedures, for example, the subdivision of complex or long maintenance tasks.

AMC 145.A.45(f) Maintenance data

ED Decision 2015/029/R

1. Data being made available to personnel maintaining aircraft means that the data should be available in close proximity to the aircraft being maintained for supervisors, mechanics and certifying staff to study.
2. Where computer systems are used, the number of computer terminals should be sufficient in relation to the size of the work programme to enable easy access, unless the computer system can produce paper copies. Where microfilm or microfiche readers/printers are used, a similar requirement is applicable.

AMC1 145.A.45(g) Maintenance data

ED Decision 2022/011/R

To keep data up-to-date, a procedure should be set up to monitor the amendment status of all data and maintain a check that all amendments are being received by being a subscriber to any document amendment scheme. Special attention should be given to mandatory instructions and associated airworthiness limitations published by design approval holders.

145.A.47 Production planning

Regulation (EU) 2021/1963

- (a) The organisation shall have a system appropriate to the amount and complexity of work to plan the availability of all necessary personnel, tools, equipment, material, maintenance data and facilities in order to ensure the safe completion of the maintenance work.
- (b) As part of the management system, the planning of maintenance tasks, and the organising of shifts, shall take into account human performance limitations, including the threat of fatigue for maintenance personnel.
- (c) When it is required to hand over the continuation or completion of maintenance tasks for reasons of a shift or personnel changeover, relevant information shall be adequately communicated between outgoing and incoming personnel.
- (d) The organisation shall ensure that aviation safety hazards associated with external working teams carrying out maintenance at the organisation's facilities are considered by the organisation's management system.

AMC 145.A.47(a) Production planning

ED Decision 2016/011/R

1. Depending on the amount and complexity of work generally performed by the maintenance organisation, the planning system may range from a very simple procedure to a complex organisational set-up including a dedicated planning function in support of the production function.
2. For the purpose of [Part-145](#), the production planning function includes two complementary elements:
 - scheduling the maintenance work ahead, to ensure that it will not adversely interfere with other work as regards the availability of all necessary personnel, tools, equipment, material, maintenance data and facilities.
 - during maintenance work, organising maintenance teams and shifts and provide all necessary support to ensure the completion of maintenance without undue time pressure.
3. When establishing the production planning procedure, consideration should be given to the following:
 - logistics,
 - inventory control,
 - square meters of accommodation,
 - man-hours estimation,

- man-hours availability,
- preparation of work,
- hangar availability,
- environmental conditions (access, lighting standards and cleanliness),
- co-ordination with internal and external suppliers, etc.
- scheduling critical maintenance tasks during periods when staff are likely to be most alert.

AMC1 145.A.47(b) Production planning

ED Decision 2022/011/R

CONSIDERATION OF FATIGUE IN THE PLANNING OF MAINTENANCE

- (a) The way and the extent to which the organisation should consider the threat of fatigue in the planning of tasks and organising of shifts will vary from one organisation to another and from one maintenance event to another, depending on what maintenance is to be carried out, how, where, when and by whom.
- (b) Fatigue is one example of human factors issues which should be taken into account by the management system, particularly for the planning activity. In this respect, where the organisation activity is prone to fatigue issues, the organisation should:
- (1) ensure that the safety policy required by point [145.A.200\(a\)](#) gives due consideration to the aspects of fatigue;
 - (2) ensure that the internal safety reporting scheme required by point [145.A.202](#) enables the collection of fatigue issues;
 - (3) ensure that the threat of fatigue is adequately taken into account by the management system key processes (e.g. assessment, management, monitoring);
 - (4) provide safety promotion material and adapt safety training accordingly.
- (c) The organising of shifts should consider good practices in the maintenance domain and applicable rules. The resulting shift schedule should be shared with the maintenance staff sufficiently in advance so they can plan adequate rest.
- The established shift durations should not be exceeded merely for management convenience even when staff is willing to work extended hours.
- (d) The organisation should have a procedure (including mitigations) to address cases where the working hours are to be significantly increased, or when the shift pattern is to be significantly modified, such as for urgent operational reasons. In cases not covered by that procedure, the organisation should perform a specific risk assessment and define additional mitigation actions, as applicable. Basic mitigations may include:
- (1) additional supervision and independent inspection;
 - (2) limitation of maintenance tasks to non-critical tasks;
 - (3) use of additional rest breaks.

GM1 145.A.47(b) Production planning

ED Decision 2022/011/R

CONSIDERATION OF FATIGUE IN THE PLANNING OF MAINTENANCE

- (a) Fatigue may be induced by:
- (i) the environment and conditions (e.g. noise, humidity, temperature, closed section, working overhead) in which the work is carried out;
 - (ii) excessive hours of duty and shift working, particularly with multiple shift periods or patterns, additional overtime or night work;
 - (iii) travel to the maintenance location (e.g. jetlag, duration)

Fatigue is one of the factors that may contribute towards maintenance errors when it is not properly considered as part of planning activities.

- (b) Taking into account the threat of fatigue in the planning of maintenance tasks and organising of shifts refers to setting up the maintenance and the shifts in a way that enables the maintenance staff to remain sufficiently free from fatigue so they can perform the planned maintenance safely, including:
- providing rest periods of sufficient time to overcome the effects of the previous shift and to be rested by the start of the following shift;
 - avoiding shift patterns that cause a serious disruption of an established sleep/work pattern, such as alternating day/night duties;
 - planning recurrent extended rest periods and notifying staff sufficiently in advance.

AMC 145.A.47(c) Production planning

ED Decision 2015/029/R

The primary objective of the changeover / handover information is to ensure effective communication at the point of handing over the continuation or completion of maintenance actions. Effective task and shift handover depends on three basic elements:

- The outgoing person's ability to understand and communicate the important elements of the job or task being passed over to the incoming person.
- The incoming person's ability to understand and assimilate the information being provided by the outgoing person.
- A formalised process for exchanging information between outgoing and incoming persons and a planned shift overlap and a place for such exchanges to take place.

GM1 145.A.47(d) Production planning

ED Decision 2022/011/R

'External working teams' refers to an organisation that does not belong to the Part-145 organisation in whose facility the maintenance is being carrying out, and which is, for example (this list is not exhaustive):

- contracted by the [Part-145](#) maintenance organisation; or
- subcontracted by the [Part-145](#) maintenance organisation; or
- contracted by the person or organisation responsible for the aircraft continuing airworthiness.

The objective of point [145.A.47\(d\)](#) is to manage the risk involved in the actual execution of maintenance by the various organisations at the same location.

Example: The need for one organisation to be informed that they should not put the aircraft in a certain configuration (regarding, for instance, electrical power) if this could contribute to an error in the maintenance performed by another organisation.

Note: Refer to [GM2 145.A.205](#) for the difference between contracting and subcontracting maintenance activities.

145.A.48 Performance of maintenance

Regulation (EU) 2021/1963

- (a) The organisation may only carry out maintenance on an aircraft or component for which it is approved when all the necessary facilities, equipment, tooling, material, maintenance data and personnel are available.
- (b) The organisation shall be responsible for the maintenance that is performed within the scope of its approval.
- (c) The organisation shall ensure that:
 - (1) after the completion of the maintenance, a general verification is carried out to ensure that the aircraft or component is clear of all tools, equipment and any extraneous parts or material, and that all access panels that were removed have been refitted;
 - (2) an error-capturing method is implemented after the performance of any critical maintenance task;
 - (3) the risk of errors during maintenance and the risk of errors being repeated in identical maintenance tasks are minimised;
 - (4) damage is assessed, and modifications and repairs are carried out using the data specified in point [M.A.304](#) of Annex I (Part-M) or point [ML.A.304](#) of Annex Vb (Part-ML), as applicable;
 - (5) the assessment of aircraft defects is carried out in accordance with point [M.A.403\(b\)](#) of Annex I (Part-M) or [ML.A.403\(b\)](#) of Annex Vb (Part-ML), as applicable.

GM 145.A.48 Performance of maintenance

ED Decision 2016/011/R

AUTHORISED PERSON

An 'authorised person' is a person formally authorised by the maintenance organisation to perform or supervise a maintenance task. An 'authorised person' is not necessarily 'certifying staff'.

SIGN-OFF

A 'sign-off' is a statement issued by the 'authorised person' which indicates that the task or group of tasks has been correctly performed. A 'sign-off' relates to one step in the maintenance process and is, therefore, different to a certificate of release to service.

AMC1 145.A.48(a) Performance of maintenance

ED Decision 2022/011/R

Point (a) of [145.A.48](#) is intended to cover the situation where the organisation may temporarily not hold all the necessary tools, equipment, material, maintenance data, etc. for an aircraft type or variant, or component specified in the organisation's scope of work. This point means that the competent authority need not amend the approval to delete the aircraft type or variants, or component on the basis that it is a temporary situation and there is a commitment from the organisation to re-acquire tools, equipment etc. before maintenance on the related aircraft or component may recommence.

GM1 145.A.48(c) Performance of maintenance

ED Decision 2022/011/R

CRITICAL DESIGN CONFIGURATION CONTROL LIMITATIONS (CDCCL)

The organisation should ensure that when performing maintenance the CDCCL are not compromised. The organisation should pay particular attention to possible adverse effects of any change to the wiring of the aircraft, even of a change not specifically associated with the fuel tank system. For example, it should be common practice to identify the segregation of fuel gauging system wiring as a CDCCL. The organisation can prevent adverse effects associated with changes to the wiring by standardising maintenance practices through training, and not through periodic inspections. Training should be provided to avoid indiscriminate routing and splicing of wires and to provide comprehensive knowledge of critical design features of fuel tank systems that would be controlled by a CDCCL. Guidance on the training of maintenance organisation personnel is provided in [Appendix IV to AMC5 145.A.30\(e\) and AMC2 145.B.200\(a\)\(3\)](#).

AMC1 145.A.48(c)(2) Performance of maintenance

ED Decision 2022/011/R

The organisation should have a procedure to identify the error-capturing methods, the critical maintenance tasks, the training and the qualifications of staff applying error-capturing methods, and how the organisation ensures that its staff is familiar with critical maintenance tasks and error-capturing methods.

AMC2 145.A.48(c)(2) Performance of maintenance

ED Decision 2022/011/R

CRITICAL MAINTENANCE TASKS

- (a) The procedure should ensure that the following maintenance tasks are reviewed to assess their impact on flight safety:
 - (1) tasks that may affect the control of the aircraft flight path and attitude, such as installation, rigging and adjustments of flight controls;
 - (2) aircraft stability control systems (autopilot, fuel transfer);
 - (3) tasks that may affect the propulsive force of the aircraft, including installation of aircraft engines, propellers and rotors; and
 - (4) overhaul, calibration or rigging of engines, propellers, transmissions and gearboxes.
- (b) The procedure should describe which data sources are used to identify critical maintenance tasks. Several data sources may be used, such as:

- (1) information from the design approval holder;
- (2) accident reports;
- (3) investigation and follow-up of incidents;
- (4) occurrence reporting;
- (5) flight data analysis, where this is available from the person or organisation responsible for the aircraft continuing airworthiness;
- (6) results of audits and independent inspections;
- (7) monitoring schemes for normal operations, where these are available from the person or organisation responsible for the aircraft continuing airworthiness;
- (8) feedback from training.

AMC3 145.A.48(c)(2) Performance of maintenance

ED Decision 2022/011/R

ERROR-CAPTURING METHODS

- (a) Error-capturing methods are those actions defined by the organisation to detect maintenance errors that are made while performing maintenance.
- (b) The organisation should ensure that the error-capturing methods are adequate for the work and the disturbance of the system. A combination of several actions (e.g. visual inspection, operational check, functional test, rigging check) may be necessary in some cases.

AMC4 145.A.48(c)(2) Performance of maintenance

ED Decision 2022/011/R

INDEPENDENT INSPECTION

Independent inspection is one possible error-capturing method.

- (a) What is an independent inspection

An independent inspection is an inspection performed by an 'independent qualified person' of a task carried out by an 'authorised person', taking into account that:

- (1) the 'authorised person' is the person who performs the task or supervises the task and they assume the full responsibility for the completion of the task in accordance with the applicable maintenance data;
- (2) the 'independent qualified person' is the person who performs the independent inspection and attests the satisfactory completion of the task and that no deficiencies have been found. The 'independent qualified person' does not issue a certificate of release to service, therefore they are not required to hold certification privileges;
- (3) the 'authorised person' issues the certificate of release to service or signs off the completion of the task after the independent inspection has been carried out satisfactorily;
- (4) the work card system used by the organisation should record the identification of both persons and the details of the independent inspection as necessary before the certificate of release to service or sign-off for the completion of the task is issued.

(b) Qualifications of persons performing independent inspections

The organisation should have procedures to demonstrate that the ‘independent qualified person’ has been trained and has gained experience in the specific inspection to be performed. The organisation could consider making use of, for example:

- (1) staff holding a certifying staff or support staff or sign-off authorisation or equivalent necessary to release or sign off the critical maintenance task;
- (2) staff holding a certifying staff or support staff or sign-off authorisation or equivalent necessary to release or sign off similar task in a product of similar category and having received specific practical training in the task to be inspected; or
- (3) a commander holding a limited certification authorisation in accordance with [145.A.30\(j\)\(4\)](#) and having received adequate practical training and having enough experience in the specific task to be inspected and on how to perform independent inspection.

(c) How to perform an independent inspection

An independent inspection should ensure correct assembly, locking and sense of operation. When inspecting control systems that have undergone maintenance, the independent qualified person should consider the following points independently:

- (1) all those parts of the system that have actually been disconnected or disturbed should be inspected for correct assembly and locking;
- (2) the system as a whole should be inspected for full and free movement over the complete range;
- (3) cables should be tensioned correctly with adequate clearance at secondary stops;
- (4) the operation of the control system as a whole should be observed to ensure that the controls are operating in the correct sense;
- (5) if different control systems are interconnected so that they affect each other, all the interactions should be checked through the full range of the applicable controls; and
- (6) software that is part of the critical maintenance task should be checked, for example: version, compatibility with aircraft configuration.

(d) What to do in unforeseen cases when only one person is available

REINSPECTION:

- (1) Reinspection is an error-capturing method subject to the same conditions as an independent inspection is, except that the ‘authorised person’ performing the maintenance task is also acting as ‘independent qualified person’ and performs the inspection.
- (2) Reinspection, as an error-capturing method, should only be performed in unforeseen circumstances when only one person is available to carry out the task and perform the independent inspection. The circumstances cannot be considered unforeseen if the person or organisation has not assigned a suitable ‘independent qualified person’ to that particular line station or shift.
- (3) The certificate of release to service is issued after the task has been performed by the ‘authorised person’ and the reinspection has been carried out satisfactorily. The work

card system used by the organisation should record the identification and the details of the reinspection before the certificate of release to service for the task is issued.

AMC1 145.A.48(c)(3) Performance of maintenance

ED Decision 2022/011/R

The procedures should be aimed at:

- (a) minimising errors and preventing omissions. Therefore, the procedures should specify:
 - (1) that every maintenance task is signed off only after completion;
 - (2) how the grouping of tasks for the purpose of sign-off allows critical steps to be clearly identified; and
 - (3) that work performed by personnel under supervision (i.e. temporary staff, trainees) is checked and signed off by an authorised person;
- (b) minimising the possibility of an error being repeated in identical tasks and, therefore, compromising more than one system or function. Thus, the procedures should ensure that no person is required to perform a maintenance task involving removal/installation or assembly/disassembly of several components of the same type fitted to more than one system, a failure of which could have an impact on safety, on the same aircraft or component during a particular maintenance check. However, in unforeseen circumstances when only one person is available, the organisation may make use of reinspection as described in point (d) of [AMC4 145.A.48\(c\)\(2\)](#).

GM1 145.A.48(c)(3) Performance of maintenance

ED Decision 2022/011/R

To minimise the risk of errors during maintenance and the risk of errors being repeated in identical maintenance tasks, the organisation may implement:

- procedures to plan the performance by different persons of the same task in different systems;
- independent inspection or re-inspection procedures.

145.A.50 Certification of maintenance

Regulation (EU) 2021/1963

- (a) A certificate of release to service shall be issued by appropriately authorised certifying staff on behalf of the organisation when that certifying staff has verified that all the maintenance that was ordered has been properly carried out by the organisation in accordance with the procedures specified in point [145.A.70](#), taking into account the availability and use of the maintenance data specified in point [145.A.45](#), and that there are no known non-compliances which endanger flight safety.
- (b) A certificate of release to service shall be issued before flight at the completion of any maintenance.
- (c) New defects or incomplete maintenance work orders identified during the maintenance shall be brought to the attention of the person or organisation responsible for the aircraft continuing airworthiness for the specific purpose of obtaining agreement to rectify such defects or completing the missing elements of the maintenance work order. In the case where that person

- or organisation declines to have such maintenance carried out under this point, point (e) is applicable.
- (d) A certificate of release to service shall be issued by appropriately authorised certifying staff on behalf of the organisation after the maintenance that was ordered has been carried out on a component whilst it was off the aircraft. The authorised release certificate “EASA Form 1” referred to in Appendix II of Annex I (Part-M) constitutes the component certificate of release to service except if otherwise specified in point [M.A.502](#) of Annex I (Part-M) or [ML.A.502](#) of Annex Vb (Part-ML), as applicable. When an organisation maintains a component for its own use, the EASA Form 1 may not be necessary if the organisation’s internal release procedures in its MOE so provides.
- (e) By derogation to point (a), when the organisation is unable to complete all maintenance ordered, it may issue a certificate of release to service within the approved aircraft limitations. The organisation shall enter such fact in the aircraft certificate of release to service before the issue of such certificate.
- (f) By way of derogation from point 145.A.50(a) and point [145.A.42](#), when an aircraft is grounded at a location other than the main line station or main maintenance base due to the non-availability of a component with the appropriate release certificate, the organisation contracted for the maintenance of that aircraft may temporarily fit a component without the appropriate release certificate for a maximum of 30 flight hours or until the aircraft first returns to the main line station or main maintenance base, whichever is the sooner, subject to the agreement of the person or organisation responsible for the aircraft’s continuing airworthiness and subject to that component having a suitable release certificate but otherwise in compliance with all applicable maintenance and operational requirements. Such components shall be removed by the time limit provided for in the first sentence of this point unless an appropriate release certificate has been obtained in the meantime under points 145.A.50(a) and [145.A.42](#).

AMC 145.A.50 Certification of maintenance after embodiment of a Standard Change or Standard Repair (SC/SR)

ED Decision 2020/002/R

[AMC M.A.801](#) of the AMC to Part-M and [AMC1 ML.A.801](#) of the AMC to Part-ML contain acceptable means of compliance for the release to service of a SC/SR by an organisation approved in accordance with [Part-145](#).

GM1 145.A.50(a) Certification of maintenance

ED Decision 2022/011/R

‘Endanger flight safety’ means any instances where safe operation could not be assured, or which could lead to an unsafe condition. These typically include, but are not limited to, significant cracking, deformation, corrosion or failure of primary structure, any evidence of burning, electrical arcing, significant hydraulic fluid or fuel leakage, and any emergency system or total system failure. An airworthiness directive that is overdue for compliance is also considered to be a hazard to flight safety.

However, the intent is not to require the maintenance organisation to find or become responsible for hidden non-compliances which are not expected to be discovered during the ordered maintenance.

A certificate of release to service issued by a maintenance organisation certifies that the performed maintenance work, as agreed in the work order or the contract, has been completed in accordance with the applicable requirements and the maintenance organisation’s approved procedures. In the

case of aircraft maintenance, it does not necessarily mean that the aircraft is in airworthy condition. Ensuring that the aircraft is airworthy before each flight always remains the responsibility of the person or organisation managing the aircraft continuing airworthiness.

AMC 145.A.50(b) Certification of maintenance

ED Decision 2022/011/R

1. The certificate of release to service should contain the following statement:
'Certifies that the work specified, except as otherwise specified, was carried out in accordance with [Part-145](#) and in respect to that work the aircraft/aircraft component is considered ready for release to service'.
Reference should also be made to the EASA [Part-145](#) approval number and the identity of the person who issued the release.
2. It is acceptable to use an alternate abbreviated certificate of release to service consisting of the following statement '[Part-145](#) release to service' instead of the full certification statement specified in paragraph 1. When the alternate abbreviated certificate of release to service is used, the introductory section of the technical log should include an example of the full certification statement from paragraph 1.
3. The certificate of release to service should relate to the task specified in the (S)TC holder's or operator's instructions or the aircraft maintenance programme which itself may cross-refer to maintenance data.
4. The date such maintenance was carried out should include when the maintenance took place relative to any life or overhaul limitation in terms of date/flying hours/cycles/landings etc., as appropriate.
5. When extensive maintenance has been carried out, it is acceptable for the certificate of release to service to summarise the maintenance as long as there is a unique cross-reference to the work package containing full details of maintenance carried out. Dimensional information should be retained in the work-pack record.

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. The alternative solution is to use existing rotatable tags and also supply a copy of the certificate.

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

ED Decision 2020/002/R

1. 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.

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.

2. 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:
 - 2.1. 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.
 - 2.2. An appropriately rated maintenance organisation approved under [Part-145](#) may issue an [EASA Form 1](#) as detailed in this AMC subparagraph 2.5 to 2.9, 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.
 - 2.3. 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.
 - 2.4. 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:
 - 2.4.1. When the last maintenance was carried out and by whom.
 - 2.4.2. 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.

- 2.4.3. 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.
- 2.4.4. Detail of life used for life-limited parts and time-controlled components being any combination of fatigue, overhaul or storage life.
- 2.4.5. 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](#).
- 2.5. New/unused aircraft components
- 2.5.1. 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 1: 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.
- (a) 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.
- (b) 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.
- (c) The storage life used of any storage life-limited parts should be established.
- 2.5.2. If it is not possible to establish satisfactory compliance with all applicable conditions specified in subparagraph 2.5.1(a) to (c) inclusive, 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.

- 2.6. Used aircraft components removed from a serviceable aircraft
- 2.6.1. 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.
- (a) The organisation should ensure that the component was removed from the aircraft by an appropriately qualified person.
 - (b) 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.
 - (c) The aircraft component should be inspected for satisfactory condition including in particular damage, corrosion or leakage and compliance with any additional maintenance data.
 - (d) 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 2.6 if it is suspected that the aircraft component has been subjected to extremes of stress, temperatures or immersion which could affect its operation.
 - (e) A maintenance history record should be available for all used serialised aircraft components.
 - (f) Compliance with known modifications and repairs should be established.
 - (g) The flight hours/cycles/landings as applicable of any life-limited parts and time-controlled components including time since overhaul should be established.
 - (h) Compliance with known applicable airworthiness directives should be established.
 - (i) Subject to satisfactory compliance with this subparagraph 2.6.1, 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.
- 2.6.2. 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.
- 2.7. 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.
- (a) 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.
- (b) 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.
 - (c) As a minimum, the assessment will need to satisfy the standards set out in paragraphs 2.5 and 2.6 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.
 - (d) 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](#).
 - (e) 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.
 - (f) 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.
 - (g) 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.
 - (h) 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.
- 2.8. 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:
- (a) dismantling the component for sufficient inspection in accordance with the appropriate maintenance data;
 - (b) 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;

- (c) reassembling and testing as necessary the component;
 - (d) completing all certification requirements as specified in [145.A.50](#).
- 2.9. 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 paragraph 2.7 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.

GM 145.A.50(d) EASA Form 1 Block 12 ‘Remarks’

ED Decision 2015/029/R

Examples of data to be entered in this block as appropriate:

- Maintenance documentation used, including the revision status, for all work performed and not limited to the entry made in block 11.
- A statement such as ‘in accordance with the CMM’ is not acceptable.
- NDT methods with appropriate documentation used when relevant.
- Compliance with airworthiness directives or service bulletins.
- Repairs carried out.
- Modifications carried out.
- Replacement parts installed.
- Life-limited parts status.
- Shelf life limitations.
- Deviations from the customer work order.
- Release statements to satisfy a foreign Civil Aviation Authority maintenance requirement.
- Information needed to support shipment with shortages or re-assembly after delivery.
- References to aid traceability, such as batch numbers.

AMC1 145.A.50(e) Certification of maintenance

ED Decision 2022/011/R

1. Being unable to establish full compliance with point [145.A.50\(a\)](#) means that the maintenance required by the person or organisation responsible for the aircraft continuing airworthiness could not be completed due to either running out of available aircraft maintenance downtime for the scheduled check, or by virtue of the condition of the aircraft requiring additional maintenance downtime, or because the maintenance data requires a flight to be performed as part of the maintenance, as described in paragraph 4.
2. The person or organisation responsible for the aircraft continuing airworthiness is responsible for ensuring that all required maintenance has been carried out before flight and therefore [145.A.50\(e\)](#) requires such person or organisation to be informed in the case where full compliance with [145.A.50\(a\)](#) cannot be achieved within the relevant limitations. If that person or organisation agrees to the deferment of full compliance, then the certificate of release to

service may be issued subject to details of the deferment, including the competent authority of the State of Registry, being endorsed on the certificate.

Note: Whether or not the person or organisation responsible for the aircraft continuing airworthiness does have the authority to defer maintenance is an issue between that person or organisation and the competent authority of the State of Registry. In case of doubt concerning such a decision, the approved maintenance organisation should inform its competent authority of such doubt, before issuing the certificate of release to service. This will allow this competent authority to investigate the matter with the competent authority of the State of Registry or the State of the operator as appropriate.

3. The procedure should draw attention to the fact that [145.A.50\(a\)](#) does not normally permit the issue of a certificate of release to service in the case of non-compliance and should state what action the mechanic, supervisor and certifying staff should take to bring the matter to the attention of the relevant department or person responsible for technical co-ordination with the person or organisation responsible for the aircraft continuing airworthiness so that the issue may be discussed and resolved with that person or organisation. In addition, the appropriate person(s) as specified in point [145.A.30\(b\)](#) should be kept informed in writing of such possible non-compliance situations and this should be included in the procedure.
4. Certain maintenance data issued by the design approval holder (e.g. aircraft maintenance manual (AMM)) requires that a maintenance task be performed in flight as a necessary condition to complete the maintenance ordered. Within the aircraft limitations, an appropriately authorised certifying staff should release the incomplete maintenance before the flight on behalf of the maintenance organisation. [GM M.A.301\(j\)](#) or [GM1 ML.A.301\(f\)](#) describe the relations with the aircraft operator, which retains the responsibility for the maintenance check flight (MCF). After performing the flight and any additional maintenance necessary to complete the maintenance ordered, a certificate of release to service should be issued in accordance with [145.A.50\(a\)](#).

AMC1 145.A.50(f) Certification of maintenance

ED Decision 2022/011/R

1. Suitable release certificate means a certificate which clearly states that the aircraft component is serviceable; that clearly specifies the organisation releasing said component together with details of the authority under whose approval the organisation works including the approval or authorisation reference.
2. 'Compliance with all applicable maintenance and operational requirements' means, in particular, making an appropriate entry in the aircraft continuing airworthiness record system or if applicable, in the aircraft technical log system, checking the compatibility of the component with the aircraft approved design, including modifications, repairs, airworthiness directives, life limitations and condition of the aircraft component plus information on where, when and why the aircraft was grounded.

145.A.55 Record-keeping

Regulation (EU) 2021/1963

(a) Maintenance records

- (1) The organisation shall record the details of the maintenance work that is carried out within the scope of its approval. As a minimum, the organisation shall retain all the records that are necessary to prove that all the requirements have been met for the issue of the certificate of release to service, including, if any, subcontractor's release documents.
- (2) The organisation shall provide a copy of each certificate of release to service to the operator or customer, together with copies of the detailed maintenance records that are associated with the work carried out and that are necessary to demonstrate compliance with point [M.A.305](#) of Annex I (Part-M) or [ML.A.305](#) of Annex Vb (Part-ML), as applicable.
- (3) The organisation shall retain a copy of all detailed maintenance records (including certificates of release to service) and of any associated maintenance data for 3 years from the date when the aircraft or component to which the work relates was issued with a certificate of release to service.
- (4) If an organisation terminates its operation, it shall transfer all the retained maintenance records that cover the last 3 years to the last customer or owner of the respective aircraft or component, or shall store them in the manner specified by the competent authority.

(b) Airworthiness review records

- (1) If an organisation has the privilege referred to in point [145.A.75\(f\)](#), it shall retain a copy of each airworthiness review certificate that it has issued, together with all the supporting documents, and shall make those records available, upon request, to the owner of the aircraft.
- (2) The organisation shall retain a copy of all the records referred to in point (1) for 3 years after the issue of the airworthiness review certificate.
- (3) If an organisation terminates its operation, it shall transfer all the retained airworthiness review records that cover the last 3 years to the last owner or operator of the respective aircraft, or shall store them in the manner specified by the competent authority.

(c) Management system, contracting and subcontracting records

The organisation shall ensure that the following records are retained for a minimum period of 5 years:

- (i) records of management system key processes referred to in point [145.A.200](#);
- (ii) contracts, both for contracting and subcontracting, referred to in point [145.A.205](#).

(d) Personnel records

- (1) The organisation shall ensure that the following records are retained:
 - (i) records of the qualifications, training and experience of the personnel involved in maintenance, compliance monitoring and safety management;
 - (ii) records of the qualifications, training and experience of all airworthiness review staff.
- (2) The records of all airworthiness review staff shall include details of any appropriate qualifications held, together with a summary of their relevant continuing airworthiness

- experience and training, and a copy of the airworthiness review authorisation issued to that staff by the organisation.
- (3) The records of all the certifying staff and support staff shall include the following:
 - (i) the details of any aircraft maintenance licence held under [Annex III \(Part-66\)](#) or equivalent;
 - (ii) the scope of the certification authorisations that were issued to that staff, where relevant;
 - (iii) the particulars of the staff that held limited or one-off certification authorisations referred to in point [145.A.30\(j\)](#).
 - (4) Personnel records shall be kept for as long as a person works for the organisation, and shall be retained for at least 3 years after the person has left the organisation, or after an authorisation issued to that person has been withdrawn.
 - (5) The organisation shall give to the staff referred to in points (2) and (3), upon their request, access to their personnel records as detailed in those points. In addition, upon their request, the maintenance organisation shall furnish each of them with a copy of their personnel records on leaving the organisation.
- (e) The organisation shall establish a record-keeping system that allows adequate storage and reliable traceability of all its activities.
 - (f) The format of the records shall be specified in the organisation's procedures.
 - (g) The records shall be stored in a manner that ensures that they are protected from damage, alteration and theft.

AMC1 145.A.55 Record-keeping

ED Decision 2022/011/R

GENERAL

- (a) The record-keeping system should ensure that all records are accessible within a reasonable time whenever they are needed. These records should be organised in a manner that ensures their traceability and retrievability throughout the required retention period.
- (b) Records should be kept in paper form, or in electronic format, or a combination of the two. Records that are stored on microfilm or in optical disc formats are also acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record is created or was last amended.
- (c) Paper systems should use robust materials which can withstand normal handling and filing. Computer record systems should have at least one backup system, which should be updated within 24 hours of any new entry. Computer record systems should include safeguards to prevent unauthorised personnel from altering the data.
- (d) All computer hardware that is used to ensure the backup of data should be stored in a different location from the one that contains the working data, and in an environment that ensures that the data remains in a good condition. When hardware or software changes take place, special care should be taken to ensure that all the necessary data continues to be accessible through at least the full period specified in the relevant provision. In the absence of any such indications, all records should be kept for a minimum period of 3 years.

GM1 145.A.55 Record-keeping

ED Decision 2022/011/R

RECORDS

Microfilming or optical storage of records may be carried out at any time. The records should be as legible as the original record, and remain so for the required retention period.

GM1 145.A.55(a)(1) Record-keeping

ED Decision 2022/011/R

MAINTENANCE RECORDS

1. Properly executed and retained maintenance records provide:
 - (i) owners and persons or organisations responsible for aircraft continuing airworthiness with information essential in establishing the airworthiness status of aircraft or component, and in particular, in controlling unscheduled and scheduled maintenance;
 - (ii) maintenance personnel with information essential for troubleshooting eliminating the need for re-inspection and rework.

The prime objective is to have secure and easily retrievable records with comprehensive and legible contents. The aircraft record should contain basic details of all serialised aircraft components and all other significant aircraft components installed during the maintenance performed, to ensure traceability to such installed aircraft component documentation, associated maintenance data and data for modifications and repairs.

2. Some gas turbine engines are assembled from modules, and a true total time in service for a total engine is not kept. When it is desirable to take advantage of the modular design, then the total time in service and the maintenance records for each module are to be maintained. The maintenance records as specified are to be kept with the module and should show compliance with any mandatory requirements pertaining to that module.

AMC1 145.A.55(a)(3) Record-keeping

ED Decision 2022/011/R

'Associated maintenance data' refers to specific information such as data pertaining to embodiment of a repair or modification data. This does not necessarily require the retention of all Aircraft Maintenance Manual, Component Maintenance Manual, IPC, etc. issued by the TC holder or STC holder. Maintenance records should refer to the revision status of the data used.

AMC1 145.A.55(d) Record-keeping

ED Decision 2022/011/R

RECORDS OF CERTIFYING STAFF AND SUPPORT STAFF

1. The following minimum information, as applicable, should be kept on record in respect of certifying staff or support staff:
 - (a) Name;
 - (b) Date of birth;
 - (c) Basic training;
 - (d) Task training or product/type training;

- (e) Recurrent training;
 - (f) Experience;
 - (g) Qualifications relevant to the authorisation;
 - (h) Scope of the authorisation (role, product, level of maintenance, etc.);
 - (i) Date of first issue of the authorisation;
 - (j) Expiry date of the authorisation (if appropriate); and
 - (k) Identification number of the authorisation.
2. The record may be kept in any format but should be controlled by the organisation's compliance monitoring function. This does not mean that the compliance monitoring manager should run the record system.
 3. The number of persons authorised to access the system should be kept to a minimum to ensure that records cannot be altered in an unauthorised manner, and that such confidential records do not become accessible to any unauthorised persons.
 4. The competent authority is authorised to access personal records when investigating the records system for initial certification and oversight, or when the competent authority has cause to doubt the competency of a particular person.

AMC2 145.A.55(d) Record-keeping

ED Decision 2022/011/R

RECORDS OF AIRWORTHINESS REVIEW STAFF

The following minimum information, as applicable, should be kept on record in respect of each airworthiness review staff:

- (a) Name;
- (b) Date of birth;
- (c) Certifying staff authorisation;
- (d) Experience as certifying staff on aircraft covered by [Part-ML](#);
- (e) Qualifications relevant to the approval (knowledge of relevant parts of [Part-ML](#), and knowledge of the relevant airworthiness review procedures);
- (f) Scope of the airworthiness review authorisation and personal authorisation reference;
- (g) Date of the first issue of the airworthiness review authorisation; and
- (h) Expiry date of the airworthiness review authorisation (if appropriate).

145.A.60 Occurrence reporting

Regulation (EU) 2021/1963

- (a) As part of its management system, the organisation shall establish and maintain an occurrence-reporting system, including mandatory and voluntary reporting. For organisations that have their principal place of business in a Member State, a single system may be established to meet the requirements of Regulation (EU) No 376/2014 and its implementing acts and of Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (b) The organisation shall report to its competent authority and to the design approval holder of the aircraft or component any safety-related event or condition of an aircraft or component identified by the organisation which endangers or, if not corrected or addressed, could endanger an aircraft, its occupants or any other person, and in particular any accident or serious incident.
- (c) The organisation shall also report any such event or condition that affects an aircraft to the person or organisation that is responsible for the continuing airworthiness of that aircraft in accordance with point [M.A.201](#) of Annex I (Part-M) or point [ML.A.201](#) Annex Vb (Part-ML), as applicable. For events or conditions that affect aircraft components, the organisation shall report to the person or organisation that requested the maintenance.
- (d) For organisations that do not have their principal place of business in a Member State:
 - (1) the initial mandatory reports shall:
 - (i) appropriately safeguard the confidentiality of the identity of the reporter and of the persons mentioned in the report;
 - (ii) be made as soon as practicable, but in any case within 72 hours after the organisation has become aware of the occurrence unless exceptional circumstances prevent this;
 - (iii) be made in a form and manner established by the competent authority;
 - (iv) contain all pertinent information about the condition known to the organisation;
 - (2) where relevant, a follow-up report that provides details of the actions the organisation intends to take to prevent similar occurrences in the future shall be made as soon as those actions have been identified; those follow-up reports shall:
 - (i) be sent to the entities referred to in points (b) and (c) to which the initial report was sent;
 - (ii) be made in a form and manner established by the competent authority.

AMC1 145.A.60 Occurrence reporting

ED Decision 2022/011/R

GENERAL

- (a) Where the organisation holds one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and its delegated and implementing acts:
 - (1) the organisation may establish an integrated occurrence reporting system covering all certificate(s) held; and

- (2) single reports for occurrences should only be provided if the following conditions are met:
- (i) the report includes all relevant information from the perspective of the different organisation certificates held;
 - (ii) the report addresses all relevant specific mandatory data fields and clearly identifies all certificate holders for which the report is made; and
 - (iii) the competent authority for all certificates is the same and such single reporting was agreed with that competent authority.
- (b) The organisation should assign responsibility to one or more suitably qualified persons with clearly defined authority, for coordinating action on airworthiness occurrences and for initiating any necessary further investigation and follow-up activity.
- (c) If more than one person are assigned such responsibility, the organisation should identify a single person to act as the main focal point for ensuring that a single reporting channel is established to the accountable manager. This should in particular apply to organisations holding one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and its delegated and implementing acts where the occurrence reporting system is fully integrated with that required under the additional certificate(s) held.

AMC2 145.A.60 Occurrence reporting

ED Decision 2022/011/R

The organisation should share relevant safety-related occurrence reports with the design approval holder of the aircraft or component in order to enable it to issue appropriate service instructions and recommendations to all relevant parties. Liaison with the design approval holder is recommended to establish whether published or proposed service information will resolve the problem or to obtain a solution to a particular problem.

GM1 145.A.60 Occurrence reporting

ED Decision 2022/011/R

MANDATORY REPORTING — GENERAL

- (a) For organisations having their principal place of business in a Member State, Regulation (EU) 2015/1018 lays down a list classifying occurrences in civil aviation to be mandatorily reported. This list should not be understood as being an exhaustive collection of all issues that may pose a significant risk to aviation safety and therefore reporting should not be limited to items listed in that Regulation.
- (b) AMC-20 ‘General Acceptable Means of Compliance for Airworthiness of Products, Parts and Appliances’ provides further details on occurrence reporting (AMC 20-8A).

GM1 145.A.60(b) Performance of maintenance

ED Decision 2022/011/R

Depending on the case, the ‘design approval holder’ will be the holder of a type certificate, a restricted type certificate, a supplemental type certificate, a European Technical Standard Order (ETSO) authorisation, a major repair design approval, a major change design approval or any other relevant approval or authorisation for products, parts and appliances deemed to have been issued under Commission Regulation (EU) No 748/2012.

145.A.65 Maintenance procedures

Regulation (EU) 2021/1963

- (a) The organisation shall establish procedures which ensure that human factors and good maintenance practices are taken into account during maintenance, including subcontracted activities, and which comply with the applicable requirements of this Annex, [Annex I \(Part-M\)](#) and [Annex Vb \(Part-ML\)](#). Such procedures shall be agreed with the competent authority.
- (b) The maintenance procedures established under this point shall:
 - (1) ensure that a clear maintenance work order or contract has been agreed between the organisation and the person or organisation that requests the maintenance, to clearly establish the maintenance to be carried out so that the aircraft and components may be released to service in accordance with point [145.A.50](#);
 - (2) cover all the aspects of carrying out the maintenance, including the provision and control of specialised services, and lay down the standards according to which the organisation intends to work.

AMC1 145.A.65 Maintenance procedures

ED Decision 2022/011/R

GENERAL

1. Maintenance procedures should be kept up to date such that they reflect the current best practices within the organisation, while being compliant with the Regulation. All organisation's employees should report differences via their organisation's internal safety reporting scheme.
2. All procedures, and changes to those procedures, should be verified and validated before use where practicable and applicable.
3. All procedures should be designed and presented in accordance with good human factors principles.

GM1 145.A.65 Maintenance procedures

ED Decision 2022/011/R

HUMAN FACTORS PRINCIPLES

The following key points should be considered when designing and presenting technical procedures in accordance with good human factors principles:

- (a) The design of procedures and changes should involve maintenance personnel who have a good working knowledge of the tasks;
- (b) Ensuring that the procedures are accurate, appropriate and usable, and reflect best practices;
- (c) Taking account of the level of expertise and experience of the user;
- (d) Taking account of the environment in which the procedures are to be used;
- (e) Ensuring that all the key information is included without the procedure being unnecessarily complex;
- (f) Where appropriate, explaining the reasons for the procedure;
- (g) The order of the tasks and the steps should reflect best practices, with the procedure clearly stating where the order of steps is critical, and where changes to the order are acceptable;

- (h) Ensuring consistency in the design of procedures and the use of terminology, abbreviations, references, etc.
- (i) For documents produced in the English language, using ‘simplified English’.

GM2 145.A.65(b)(1) Maintenance procedures

ED Decision 2022/011/R

[Appendix XI to AMC M.A.708\(c\)](#) or [Appendix IV to AMC1 CAMO.A.315\(c\)](#) provide guidance on the elements that need to be considered for the maintenance contract between the CAMO and the maintenance organisation. The [Part-145](#) organisation should take into account these elements to ensure that a clear contract or work order has been concluded before providing maintenance services.

AMC1 145.A.65(b)(2) Maintenance procedures

ED Decision 2022/011/R

Specialised services include any specialised activity, such as, but not limited to, non-destructive testing requiring particular skills and/or qualification. Point [145.A.30\(f\)](#) covers the qualification of personnel but, in addition, there is a need to establish maintenance procedures that cover the control of any specialised process.

145.A.70 Maintenance organisation exposition (MOE)

Regulation (EU) 2021/1963

- (a) The organisation shall establish and maintain a maintenance organisation exposition (MOE) that includes, directly or by reference, all of the following:
 - (1) a statement signed by the accountable manager confirming that the maintenance organisation will at all times work in accordance with this Annex, [Annex I \(Part-M\)](#) and [Annex Vb \(Part-ML\)](#), as applicable, and with the approved MOE. If the accountable manager is not the chief executive officer of the organisation, then the chief executive officer shall countersign the statement;
 - (2) the organisation’s safety policy and the related safety objectives referred to in point [145.A.200\(a\)\(2\)](#);
 - (3) the title(s) and name(s) of the person(s) nominated under points [145.A.30\(b\)](#), [\(c\)](#) and [\(ca\)](#);
 - (4) the duties and responsibilities of the persons nominated under points [145.A.30\(b\)](#), [\(c\)](#) and [\(ca\)](#), including the matters on which they may deal directly with the competent authority on behalf of the organisation;
 - (5) an organisation chart showing the accountability and associated lines of responsibility, established in accordance with point [145.A.200\(a\)\(1\)](#), between all the persons referred to in points [145.A.30\(a\)](#), [\(b\)](#), [\(c\)](#) and [\(ca\)](#);
 - (6) a list of the certifying staff and, if applicable, support staff and airworthiness review staff with their scope of authorisation;
 - (7) a general description of the manpower resources and of the system that is in place to plan the availability of staff, as required by point [145.A.30\(d\)](#);
 - (8) a general description of the facilities at each approved location;
 - (9) a specification of the scope of work of the organisation that is relevant to the terms of approval as required by point [145.A.20](#);

- (10) the procedure that sets out the scope of changes not requiring prior approval and that describes how such changes will be managed and notified to the competent authority, as required by point [145.A.85\(c\)](#);
 - (11) the procedure for amending the MOE;
 - (12) the procedures specifying how the organisation ensures compliance with this Annex;
 - (13) a list of the commercial operators to which the organisation provides regular aircraft maintenance services, and the associated procedures;
 - (14) where applicable, a list of the subcontracted organisations referred to in point [145.A.75\(b\)](#);
 - (15) a list of the approved locations including, where applicable, line maintenance locations referred to in point [145.A.75\(d\)](#);
 - (16) a list of the contracted organisations;
 - (17) a list of the currently approved alternative means of compliance used by the organisation.
- (b) The initial issue of the MOE shall be approved by the competent authority. It shall be amended as necessary so that it remains an up-to-date description of the organisation.
- (c) Amendments to the MOE shall be managed as set out in the procedures referred to in points (a)(10) and (a)(11). Any amendments that are not included in the scope of the procedure referred to in point (a)(10), as well as any amendments related to the changes listed in point [145.A.85\(a\)](#), shall be approved by the competent authority.

AMC1 145.A.70 Maintenance organisation exposition (MOE)

ED Decision 2022/011/R

- (a) Personnel should be familiar with those parts of the MOE that are relevant to their tasks.
- (b) The organisation should designate the person responsible for monitoring and amending the MOE, including associated procedures or manuals, in accordance with point [145.A.70\(c\)](#).
- (c) The organisation may use electronic data processing (EDP) for the publication of the MOE. Attention should be paid to the compatibility of the EDP systems with the necessary dissemination, both internally and externally, of the MOE.
- (d) When information is provided by reference (e.g. separate document, manual or electronic data file), the organisation should establish clear cross-reference to such documents or files in the MOE and have procedures for the management of these document or files.

GM1 145.A.70 Maintenance organisation exposition (MOE)

ED Decision 2022/011/R

1. The purpose of the MOE is to:
 - specify the scope of work and show how the organisation intends to comply with this Annex; and
 - provide all the necessary information and procedures for the personnel of the organisation to perform their duties.
2. Complying with its contents will ensure that the organisation remains in compliance with [Part-145](#) and, as applicable, [Part-M](#) and/or [Part-ML](#).

AMC1 145.A.70(a) Maintenance organisation exposition (MOE)

ED Decision 2022/011/R

This AMC provides an outline of the layout of an acceptable MOE. Where an organisation uses a different format, for example, to allow the exposition to serve for more than one approval within the scope of Regulation (EU) 2018/1139, then the exposition should contain an index that shows where the subject matter can be found in the exposition.

PART 1 GENERAL

- 1.1 Statement by the accountable manager
- 1.2 Safety policy and objectives
- 1.3 Management personnel
- 1.4 Duties and responsibilities of the management personnel
- 1.5 Management organisation chart
- 1.6 List of certifying staff, support staff and airworthiness review staff
- 1.7 Manpower resources
- 1.8 General description of the facilities at each address intended to be approved
- 1.9 Organisation's intended scope of work
- 1.10 Procedures for changes (including MOE amendment) requiring prior approval
- 1.11 Procedures for changes (including MOE amendment) not requiring prior approval
- 1.12 Procedure for alternative means of compliance (AltMoC)

PART 2 MAINTENANCE PROCEDURES

- 2.1 Supplier evaluation and subcontractor control procedure
- 2.2 Acceptance/inspection of aircraft components and material, and installation
- 2.3 Storage, tagging and delivery of components and material to maintenance
- 2.4 Acceptance of tools and equipment
- 2.5 Calibration of tools and equipment
- 2.6 Use of tooling and equipment by staff (including alternate tools)
- 2.7 Procedure for controlling working environment and facilities
- 2.8 Maintenance data and relationship to aircraft/aircraft component manufacturers' instructions including updating and availability to staff
- 2.9 Acceptance, coordination and performance of repair works
- 2.10 Acceptance, coordination and performance of scheduled maintenance works
- 2.11 Acceptance, coordination and performance of airworthiness directives works
- 2.12 Acceptance, coordination and performance of modification works
- 2.13 Maintenance documentation development, completion and sign-off

- 2.14 Technical record control
- 2.15 Rectification of defects arising during maintenance
- 2.16 Release to service procedure
- 2.17 Records for the person or organisation that ordered maintenance
- 2.18 Occurrence reporting
- 2.19 Return of defective aircraft components to store
- 2.20 Defective components to outside contractors
- 2.21 Control of computer maintenance record systems
- 2.22 Control of man-hour planning versus scheduled maintenance work
- 2.23 Critical maintenance tasks and error-capturing methods
- 2.24 Reference to specific procedures such as:
 - Engine running procedures
 - Aircraft pressure run procedures
 - Aircraft towing procedures
 - Aircraft taxiing procedures
- 2.25 Procedures to detect and rectify maintenance errors.
- 2.26 Shift/task handover procedures
- 2.27 Procedures for notification of maintenance data inaccuracies and ambiguities
- 2.28 Production planning and organising of maintenance activities
- 2.29 Airworthiness review procedures and records
- 2.30 Fabrication of parts
- 2.31 Procedure for component maintenance under aircraft or engine rating
- 2.32 Maintenance away from approved locations
- 2.33 Procedure for assessment of work scope as line or base maintenance

PART L2 ADDITIONAL LINE MAINTENANCE PROCEDURES

(Part L2 may complement where necessary, procedures established in Part 2)

- L2.1 Line maintenance control of aircraft components, tools, equipment, etc.
- L2.2 Line maintenance procedures related to servicing/fuelling/de-icing, including inspection for/removal of de-icing/anti-icing fluid residues, etc.
- L2.3 Line maintenance control of defects and repetitive defects
- L2.4 Line procedure for completion of technical logs
- L2.5 Line procedure for pooled parts and loaned parts
- L2.6 Line procedure for return of defective parts removed from aircraft
- L2.7 Line procedure for critical maintenance tasks and error-capturing methods

PART 3 MANAGEMENT SYSTEM PROCEDURES

- 3.1 Hazard identification and safety risk management schemes
- 3.2 Internal safety reporting and investigations
- 3.3 Safety action planning
- 3.4 Safety performance monitoring
- 3.5 Change management
- 3.6 Safety training (including human factors) and promotion
- 3.7 Immediate safety action and coordination with the operator's emergency response plan (ERP)
- 3.8 Compliance monitoring
 - 3.8.1 Audit plan and audit procedures
 - 3.8.2 Product audit and inspections
 - 3.8.3 Audit findings — corrective action procedure
- 3.9 Certifying staff and support staff qualifications, authorisation and training procedures
- 3.10 Certifying staff and support staff records
- 3.11 Airworthiness review staff qualification, authorisation and records
- 3.12 Compliance monitoring and safety management personnel
- 3.13 Independent inspection staff qualification
- 3.14 Mechanics qualification and records
- 3.15 Process for exemption from aircraft/aircraft component maintenance tasks
- 3.16 Concession control for deviations from the organisation's procedures
- 3.17 Qualification procedure for specialised activities such as NDT, welding, etc.
- 3.18 Management of external working teams
- 3.19 Competency assessment of personnel
- 3.20 Training procedures for on-the-job training as per Section 6 of [Appendix III to Part-66](#) (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same).
- 3.21 Procedure for the issue of a recommendation to the competent authority for the issue of a Part-66 licence in accordance with point [66.B.105](#) (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same).
- 3.22 Management system record-keeping

PART 4 RELATIONSHIP WITH CUSTOMER/OPERATORS

- 4.1 List of the commercial operators to which the organisation provides regular aircraft maintenance services
- 4.2 Customer interface procedures and paperwork
- 4.3 [Reserved]

PART 5 SUPPORTING DOCUMENTS

- 5.1 Sample documents
- 5.2 List of subcontractors as per point [145.A.75\(b\)](#)
- 5.3 List of line maintenance locations as per point [145.A.75\(d\)](#)
- 5.4 List of contracted organisations as per point [145.A.70\(a\)\(16\)](#)
- 5.5 List of used AltMoC as per point [145.A.70\(a\)\(17\)](#)

PART 6 RESERVED**PART 7 FAA SUPPLEMENTARY PROCEDURES FOR A TITLE 14 CFR PART 145 REPAIR STATION**

This section is reserved for those EASA Part-145 approved maintenance organisations that are also certificated as an FAA Title 14 CFR Part 145 repair station.

The contents of this Part should be based on the Maintenance Annex Guidance (MAG) issued by EASA and the FAA following the agreement between the United States of America and the European Union on cooperation in the regulation of civil aviation safety.

**PART 8 TRANSPORT CANADA CIVIL AVIATION (TCCA) SUPPLEMENTARY PROCEDURES FOR A CAR 573
MAINTENANCE ORGANISATION**

This section is reserved for those EASA Part-145 approved maintenance organisations holding a CAR 573 approval.

The content of this Part should be based on the Maintenance Annex Guidance (MAG) issued by EASA and the TCCA following the agreement on civil aviation safety between the European Union and Canada.

PART 9 ANAC SUPPLEMENTARY PROCEDURES FOR AN RBAC 145 MAINTENANCE ORGANISATION

This section is reserved for those EASA Part-145 approved maintenance organisations that hold an RBAC 145 approval.

The contents of this Part should be based on the Maintenance Annex Guidance (MAG) issued by EASA and ANAC following the agreement on civil aviation safety between the European Union and Brazil.

AMC1 145.A.70(a)(1) Maintenance organisation exposition (MOE)*ED Decision 2022/011/R***ACCOUNTABLE MANAGER STATEMENT**

Part 1 of the MOE should include a statement signed by the accountable manager (and countersigned by the chief executive officer, if different), confirming that the MOE and any associated manuals will be complied with at all times.

The accountable manager's exposition statement as specified under point [145.A.70\(a\)\(1\)](#) should embrace the intent of the following paragraph, and in fact, this statement may be used without amendment. Any modification to the statement should not alter the intent.

'This exposition and any associated referenced manuals define the organisation and procedures upon which the Part-145 approval certificate is issued by (competent authority).*

These procedures are endorsed by the undersigned and must be complied with, as applicable, when contracts or work orders are being progressed under the organisation approval certificate.

These procedures do not override the necessity of complying with any new or amended regulation published from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that the approval of the organisation is based on the continuous compliance of the organisation with Part-145, Part-M and Part-ML, as applicable, and with the organisation's procedures described in this exposition. The competent authority is entitled to limit, suspend, or revoke the approval certificate if the organisation fails to fulfil the obligations imposed by Part-145, Part-M and Part-ML, as applicable, or any conditions according to which the approval was issued.*

Signed

Dated

Accountable Manager and..... (quote position).....

Chief Executive Officer ...

For and on behalf of..... (quote organisation's name).....'

Note: Where it states ('competent authority*'), please insert the actual name of the competent authority, for example, EASA, the LBA, the DGAC, etc.

Whenever the accountable manager changes, it is important that the new accountable manager signs the statement at the earliest opportunity.

145.A.75 Privileges of the organisation

Regulation (EU) 2021/1963

In accordance with the MOE, the organisation shall be entitled to carry out the following tasks:

- (a) maintain any aircraft or component for which it is approved at the locations identified in the certificate and in the MOE;
- (b) arrange for the maintenance of any aircraft or component for which it is approved at another subcontracted organisation that works under the management system of the organisation. This is limited to the work permitted under the procedures established in accordance with point [145.A.65](#) and it shall not include a base maintenance check of an aircraft, or a complete workshop maintenance check or overhaul of an engine or an engine module;
- (c) Maintain any aircraft or any component for which it is approved at any location subject to the need for such maintenance arising either from the unserviceability of the aircraft or from the necessity of supporting occasional line maintenance, subject to the conditions specified in the exposition;
- (d) Maintain any aircraft and/or component for which it is approved at a location identified as a line maintenance location capable of supporting minor maintenance and only if the organisation exposition both permits such activity and lists such locations;
- (e) Issue certificates of release to service in respect of completion of maintenance in accordance with point [145.A.50](#);

- (f) if specifically approved to do so for aircraft covered by [Annex Vb \(Part-ML\)](#) and if it has its principal place of business in one of the Member States, the organisation may perform airworthiness reviews and issue the corresponding airworthiness review certificates under the conditions specified in point [ML.A.903](#) of Annex Vb (Part-ML).

AMC1 145.A.75(b) Privileges of the organisation

ED Decision 2022/011/R

SUBCONTRACTING

1. Working under the management system of an organisation appropriately approved under [Part-145](#) (subcontracting) refers to the case of one organisation, whether or not it is approved under Part-145, that carries out certain maintenance (see paragraph 3.1) under the approval certificate of a Part-145. In order to subcontract, the Part-145 organisation should have a procedure for the control of such subcontractors as described below. Any approved maintenance organisation that carries out maintenance under its own approval certificate for another approved maintenance organisation is not considered to be subcontracted for the purpose of this paragraph, but contracted by that other organisation (see [GM2 145.A.205](#)).
2. Maintenance of engines or engine modules other than ‘a complete workshop maintenance check or overhaul’ is intended to mean any maintenance that can be carried out without disassembly of the core engine or, in the case of modular engines, without disassembly of any core module.
3. FUNDAMENTALS OF SUBCONTRACTING UNDER PART-145
 - 3.1. The most common reasons for allowing an organisation approved under [Part-145](#) to subcontract is to permit acceptance of certain maintenance tasks carried out by subcontractors when approvals by the competent authority of those subcontractors are not justified (e.g. limited scope of work, limited volume of maintenance activities, limited number of potential customers, limited need in time) or when the subcontractors cannot demonstrate compliance with all elements of the regulation (e.g. no maintenance facilities, specialised staff not covering all maintenance scope).

This subcontracting option permits the acceptance of the following maintenance:

 - (a) specialised maintenance services, such as, but not limited to, surface treatment (e.g. plating, plasma spraying), fabrication of specified parts for repairs/modifications, welding, etc.;
 - (b) aircraft maintenance (e.g. line maintenance, leaks detection in fuel tanks, special repairs/modifications, complete aircraft painting) up to but not including a complete base maintenance check as specified in point [145.A.75\(b\)](#);
 - (c) component maintenance.;
 - (d) engine maintenance up to but not including a complete workshop maintenance check or overhaul of an engine or engine module as specified in point [145.A.75\(b\)](#).
 - 3.2. When maintenance is carried out under the management system of a [Part-145](#) organisation, it means that for the duration of such maintenance, the Part-145 approval has been temporarily extended to include the subcontractor. It therefore follows that all parts of the subcontractor (facilities, personnel, equipment and tools, components, maintenance data and procedures) involved with the maintenance organisation’s products undergoing maintenance should meet Part-145 requirements and the Part-145

organisation's MOE for the duration of that maintenance, and it remains the Part-145 organisation's responsibility to ensure such requirements are satisfied.

- 3.3. When subcontracting, the [Part-145](#) organisation is not required to have complete facilities for the maintenance that it needs to subcontract, but it should have its own expertise to determine whether the subcontractor meets the necessary standards. However, a Part-145 organisation cannot be approved unless it has in-house the facilities, personnel, equipment and tools, components, maintenance data, procedures and expertise to carry out the majority of the maintenance for which it wishes to receive the terms of approval.
 - 3.4. The organisation may find it necessary to include specialised subcontractors to enable it to be approved to issue the certificate of release to service of a particular maintenance. Examples are provided in point 3.1(a). To authorise the use of such subcontractors, the competent authority will need to be satisfied that the [Part-145](#) organisation has the necessary expertise and procedures to control such subcontractors.
 - 3.5. A maintenance organisation working outside the scope of its terms of approval is deemed to be not approved for the work considered. Such an organisation may in this circumstance operate only as a subcontractor under the management system and control of another organisation appropriately approved under [Part-145](#).
 - 3.6. Authorisation to sub-contract is indicated by the competent authority approving the MOE containing a specific procedure on the control of subcontractors as well as a list of subcontractors.
4. PART-145 PROCEDURES FOR THE CONTROL OF SUBCONTRACTORS
- 4.1. A pre-audit procedure should be established whereby the [Part-145](#) organisation should audit a prospective subcontractor to determine whether those services of the subcontractor that it wishes to use meet the intent of Part-145. This audit should be performed under the responsibility of the compliance monitoring function.
 - 4.2. The [Part-145](#) organisation needs to assess to what extent it will use the subcontractor resources (facilities included). The contract between the Part-145 organisation and the subcontractor will determine whether the Part-145 organisation requires its own paperwork, maintenance data and components to be used or, provided that they meet the requirements of Part-145, if the facilities, equipment and tools from the subcontractor will be used. In the case of subcontractors who provide specialised services, it may for practical reasons be necessary to use their specialised services paperwork, maintenance data and components, subject to acceptance by the Part-145 organisation.
 - 4.3. Unless the sub-contracted maintenance work can be fully inspected on receipt by the [Part-145](#) organisation, it will be necessary for the Part-145 organisation to establish an MOE procedure to control the subcontracted maintenance work (and associated supporting documents). The organisation will need to consider whether to use its own personnel or to authorise the subcontractor personnel for that control.
 - 4.4. The certificate of release to service may be issued either by subcontractor staff holding a certification authorisation issued by the [Part-145](#) organisation in accordance with points [145.A.30](#) and [145.A.35](#) as appropriate, or by the Part-145 organisation certifying staff.
 - 4.5. The subcontractor control procedure will need to address the relevant management system key processes such as safety risk management and compliance monitoring (see

point [145.A.205](#)). The procedure should ensure that records of all subcontractor audits and inspections, and the corresponding actions are kept, and provide information on when subcontractors are used. The procedure should include a clear revocation process for subcontractors that do not meet the [Part-145](#) maintenance organisation's requirements.

- 4.6. The [Part-145](#) compliance monitoring staff will need to audit the subcontractor control function of the Part-145 organisation and to audit the subcontractors unless this task is already carried out by the subcontractor control function on behalf of the compliance monitoring function.
- 4.7. The contract between the [Part-145](#) organisation and the subcontractor should contain a provision to ensure that access to the subcontractor is granted to any person authorised by the authorities specified in point [145.A.140](#).

145.A.85 Changes to the organisation

Regulation (EU) 2021/1963

- (a) The following changes to the organisation shall require prior approval by the competent authority:
- (1) changes to the certificate, including the terms of approval of the organisation;
 - (2) changes of the persons referred to in points [145.A.30\(a\)](#), [\(b\)](#), [\(c\)](#) and [\(ca\)](#);
 - (3) changes to the reporting lines between the personnel nominated in accordance with points [145.A.30\(b\)](#), [\(c\)](#) and [\(ca\)](#), and the accountable manager;
 - (4) the procedure as regards changes not requiring prior approval referred to in point (c);
 - (5) additional locations of the organisation other than those that are subject to point [145.A.75\(c\)](#).
- (b) For the changes referred to in point (a) and for all other changes requiring prior approval in accordance with this Annex, the organisation shall apply for and obtain an approval issued by the competent authority. The application shall be submitted before such changes take place in order to enable the competent authority to determine that there is continued compliance with this Annex and to amend, if necessary, the organisation certificate and the related terms of approval that are attached to it.
- The organisation shall provide the competent authority with any relevant documentation.
- The change shall only be implemented upon the receipt of a formal approval from the competent authority in accordance with point [145.B.330](#).
- The organisation shall operate under the conditions prescribed by the competent authority during such changes, as applicable.
- (c) All changes not requiring prior approval shall be managed and notified to the competent authority as set out in a procedure which is approved by the competent authority in accordance with point [145.B.310\(h\)](#).

AMC1 145.A.85 Changes to the organisation

ED Decision 2022/011/R

APPLICATION TIME FRAMES

- (a) The application for a change to an organisation certificate should be submitted at least 30 working days before the date of the intended changes.
- (b) In the case of a planned change of a nominated person, the organisation should inform the competent authority at least 20 working days before the date of the proposed change.
- (c) Unforeseen changes should be notified at the earliest opportunity, in order to enable the competent authority to determine whether there is continued compliance with the applicable requirements, and to amend, if necessary, the organisation certificate and the related terms of approval.

AMC2 145.A.85 Changes to the organisation

ED Decision 2022/011/R

MANAGEMENT OF CHANGES

The organisation should manage changes to the organisation in accordance with point (e) of [AMC1 145.A.200\(a\)\(3\)](#). For changes requiring prior approval, it should conduct a risk assessment and provide it to the competent authority upon request.

GM1 145.A.85 Changes to the organisation

ED Decision 2022/011/R

CHANGES REQUIRING OR NOT REQUIRING PRIOR APPROVAL

Point [145.A.85](#) is structured as follows:

- Point (a) introduces an obligation of prior approval (by the competent authority) for specific cases listed under (1) to (5);
- Point (b) address all instances (including (a)) where this Annex ([Part-145](#)) explicitly requires an approval by the competent authority (e.g. procedure for use of alternative tooling or equipment, ref. [145.A.40\(a\)\(i\)](#)). Changes relevant to these instances should be considered as changes requiring a prior approval (see list in [GM1 145.A.85\(b\)](#)), unless otherwise specified by this Annex (Part-145).

Point (b) also indicates how all changes requiring prior approval should be handled;

- Point (c) introduces the possibility for the organisation to agree with the competent authority that certain changes to the organisation (other than those covered by (a) or (b)) can be implemented without prior approval depending on the compliance and safety performance of the organisation, and in particular, on its capability to apply change management principles.

GM1 145.A.85(a)(1) Changes to the organisation

ED Decision 2022/011/R

CHANGE OF THE NAME OF THE ORGANISATION

A change of the name requires the organisation to submit an application as a matter of urgency for a re-issue of their certificate.

If this is the only change to report, the application can be accompanied by a copy of the documentation that was previously submitted to the competent authority under the previous name, as a means of demonstrating that the organisation complies with the applicable requirements.

GM1 145.A.85(a)(2) Changes to the organisation

ED Decision 2022/011/R

CHANGE OF A NOMINATED PERSON

In accordance with point [145.A.85\(a\)\(2\)](#), a change of a nominated person (ref. [145.A.30](#)) requires a prior approval. In case of a unplanned/unanticipated change, a deputy (such as the deputy referred to in [145.A.30\(b\)](#)) may ensure business continuity during the approval process of the new nominated person.

GM1 145.A.85(b) Changes to the organisation

ED Decision 2022/011/R

CHANGES REQUIRING PRIOR APPROVAL (OTHER THAN THOSE COVERED BY POINT 145.A.85(A))

The following are examples of changes that require prior approval by the competent authority (other than those covered by point [145.A.85\(a\)](#)), as specified in Part-145:

- (a) changes to the AltMoC [[145.A.120\(b\)](#)];
- (b) changes to the MOE procedure for the use of alternative tooling or equipment [[145.A.40\(a\)\(i\)](#)];
- (c) changes to the MOE procedure allowing a B-rated organisation to carry out maintenance on an installed engine during 'base' and 'line' maintenance [[Appendix II, point \(f\)](#)];
- (d) changes to the MOE procedure allowing a C-rated organisation to carry out maintenance on an installed component (other than a complete engine/APU) during 'base' and 'line' maintenance or at an engine/APU maintenance facility [[Appendix II, point \(g\)](#)];
- (e) changes to the procedures to establish and control the competency of personnel [[145.A.30\(e\)](#)];
- (f) changes to the system for reporting to the competent authority on the safety performance and regulatory compliance of the organisation (in the case of an extension of the oversight planning cycle beyond 36 months) [[145.B.305\(d\)](#)].

145.A.90 Continued validity

Regulation (EU) 2021/1963

- (a) The organisation's certificate shall remain valid, subject to compliance with all of the following conditions:
 - 1. the organisation remaining in compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts, taking into account the provisions of point [145.B.350](#) of this Annex related to the handling of findings;
 - 2. the competent authority being granted access to the organisation as specified in point [145.A.140](#);
 - 3. the certificate not being surrendered by the organisation, or suspended or revoked by the competent authority under point [145.B.355](#).
- (b) Upon surrender or revocation, the certificate shall be returned to the competent authority without delay.

145.A.95 Findings and observations

Regulation (EU) 2021/1963

- (a) After the receipt of a notification of findings in accordance with point [145.B.350](#), the organisation shall:
- (1) identify the root cause(s) of, and contributing factor(s) to, the non-compliance;
 - (2) define a corrective action plan;
 - (3) demonstrate the implementation of corrective action to the satisfaction of the competent authority.
- (b) The actions referred to in point (a) shall be performed within the period agreed with that competent authority in accordance with point [145.B.350](#).
- (c) The observations received in accordance with point [145.B.350\(f\)](#) shall be given due consideration by the organisation. The organisation shall record the decisions taken in respect of those observations.

AMC1 145.A.95 Findings and observations

ED Decision 2022/011/R

FINDING-RELATED CORRECTIVE ACTION PLAN AND IMPLEMENTATION

After receiving the notification of findings, the organisation should identify and define the actions for all findings to address the effects of the non-compliance and its root cause(s) and contributing factor(s).

Depending on the issues, the organisation may need to take immediate corrections.

The corrective action plan should:

- include the correction of the issue, corrective actions and preventive actions, as well as the planning to implement these actions;
- be timely submitted to the competent authority for acceptance before it is effectively implemented.

After receiving the acceptance of the corrective action plan from the competent authority, the organisation should implement the associated actions.

Within the agreed period, the organisation should inform the competent authority that the corrective action plan has been completed and should send the associated evidence, as requested by the competent authority.

AMC2 145.A.95 Findings and observations

ED Decision 2022/011/R

DUE CONSIDERATION TO OBSERVATIONS

For each observation notified by the competent authority, the organisation should analyse the related issues and determine when actions are needed.

The handling of the observations may follow a process similar to the handling of the findings by the organisation.

The organisation should record the analysis and the outputs, such as the actions taken or the reasons for not taking actions.

GM1 145.A.95 Findings and observations

ED Decision 2022/011/R

ROOT CAUSE ANALYSIS

- (a) It is important that the analysis does not primarily focus on establishing who or what caused the non-compliance, but on why it was caused. Establishing the root cause(s) often requires an overarching view of the events and circumstances that led to it, to identify all the possible systemic and contributing factors (regulatory, technical, human factors, organisational factors, etc.) in addition to the direct factors.
- (b) A narrow focus on single events or failures, or the use of a simple, linear model, such as a fault tree, to identify the chain of events that led to the non-compliance, may not properly reflect the complexity of the issue, and therefore there is a risk that important factors that must be addressed in order to prevent a reoccurrence will be ignored.

Such an inappropriate or partial root cause analysis often leads to defining ‘quick fixes’ that only address the symptoms of the non-conformity. A peer review of the results of the root cause analysis may increase its reliability and objectivity.

145.A.120 Means of compliance

Regulation (EU) 2021/1963

- (a) An organisation may use any alternative means of compliance to establish compliance with this Regulation.
- (b) If an organisation wishes to use an alternative means of compliance, it shall, prior to using it, provide the competent authority with a full description. The description shall include any revisions to manuals or procedures that may be relevant, as well as an explanation indicating how compliance with this Regulation is achieved.

The organisation may use those alternative means of compliance subject to prior approval from the competent authority.

GM1 145.A.120 Means of compliance

ED Decision 2022/011/R

GENERAL

- (a) Acceptable means of compliance (AMC), as referred to in Article 76(3) of Regulation (EU) 2018/1139, are a tool to standardise the demonstration of compliance and facilitate the verification activities of the competent authorities with Regulation (EU) 2018/1139 and its delegated and implementing acts. They are published by the Agency to achieve these objectives. Whereas the competent authorities and the regulated entities are not legally bound to use them, applying them is recommended.
- (b) If an organisation wishes to use means to comply with the Regulation different from the AMC established by EASA, that organisation may need to demonstrate compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts by using alternative means of compliance (AltMoC):
 - (1) established by its competent authority — see [GM1 145.B.120](#); or
 - (2) established by that organisation and approved by its competent authority — see point (c) below.

An AltMoC does not allow deviation from Regulation (EU) 2018/1139 and its delegated or implementing acts.

- (c) AltMoC established by an organisation and approved by its competent authority:

An organisation wishing to use a different means of compliance than the one published by the Agency, can propose and implement an AltMoC only once the competent authority approves it. In this case, the organisation is responsible for demonstrating how that AltMoC establishes compliance with the Regulation.

This approval will be granted by its competent authority on an individual basis and restricted to that specific applicant. Other organisations wishing to use the same means of compliance should follow the AltMoC process (demonstrating compliance with the Regulation) and obtain individual approval from their competent authority.

GM2 145.A.120 Means of Compliance

ED Decision 2022/011/R

WHEN AN ALTERNATIVE MEANS OF COMPLIANCE IS NEEDED

When there is no EASA AMC for a certain requirement in the Regulation, the means of compliance proposed by the organisation to that point of the Regulation do not need to go through the AltMoC process. It is the responsibility of the competent authority to verify that compliance with the Regulation is met. However, in certain cases the organisation may propose, and the competent authority may agree, to have such means of compliance follow the AltMoC process.

When there is an EASA AMC, the AltMoC process is needed in the following (not exhaustive) cases:

- a means to comply with the Regulation is technically different in character to the AMC published by EASA;
- A Form is significantly different from the one proposed in the EASA AMC.

Note: A Form required by the delegated and implementing acts cannot be changed.

Examples of issues not considered to require an AltMoC process include, but are not limited to:

- editorial changes to an EASA AMC, as long as it does not change the intent of the AMC;
- transposing an EASA AMC into the organisational structure, organisational processes, or standard operating procedures with different wording and terminology customised to the organisation's environment, if this does not change the intent of the AMC and its associated level of safety.

AMC1 145.A.120(b) Means of compliance

ED Decision 2022/011/R

DESCRIPTION SUPPORTING THE ALTERNATIVE MEANS OF COMPLIANCE

- (a) The description of the AltMoC should include:
- a summary of the AltMoC;
 - the content of the AltMoC;
 - a statement that compliance with the Regulation is achieved; and

- in support of that statement, an assessment demonstrating that the AltMoC reaches an acceptable level of safety, taking into account the level of safety provided by the corresponding EASA AMC.
- (b) All these elements describing the AltMoC form an integral part of the management system records to be kept in accordance with [145.A.55](#).

145.A.140 Access

Regulation (EU) 2021/1963

For the purpose of determining compliance with the relevant requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts, the organisation shall ensure that access to any facility, aircraft, document, records, data, procedures or to any other material relevant to its activity subject to certification, whether it is subcontracted or not, is granted to any person authorised by one of the following authorities:

- (a) the competent authority defined in point [145.1](#);
- (b) the authority performing the oversight tasks in accordance with point [145.B.300\(d\)](#).

145.A.155 Immediate reaction to a safety problem

Regulation (EU) 2021/1963

The organisation shall implement:

- (a) any safety measures mandated by the competent authority in accordance with point [145.B.135](#);
- (b) any relevant mandatory safety information issued by the Agency.

145.A.200 Management system

Regulation (EU) 2021/1963

- (a) The organisation shall establish, implement and maintain a management system that includes:
 - (1) clearly defined accountability and lines of responsibility throughout the organisation, including a direct safety accountability of the accountable manager;
 - (2) a description of the overall philosophies and principles of the organisation with regard to safety (“the safety policy”), and the related safety objectives;
 - (3) the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of the associated risks, including taking actions to mitigate the risks and verify their effectiveness;
 - (4) maintaining personnel trained and competent to perform their tasks;
 - (5) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending that documentation;
 - (6) a function to monitor the compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure the effective implementation of corrective actions as necessary.

- (b) The management system shall correspond to the size of the organisation and the nature and complexity of its activities, taking into account the hazards and the associated risks inherent in those activities.
- (c) If the organisation holds one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139, the management system may be integrated with that required under the additional certificate(s) held.

GM1 145.A.200 Management system

ED Decision 2022/011/R

GENERAL

Safety management seeks to proactively identify hazards and to mitigate the related safety risks before they result in aviation accidents and incidents. Safety management enables an organisation to manage its activities in a more systematic and focused manner. When an organisation has a clear understanding of its role and contribution to aviation safety, it can prioritise safety risks and more effectively manage their resources and obtain optimal results.

The principles of the requirements in points [145.A.200](#), [145.A.202](#), [145.A.205](#) and the related AMC constitute the EU management system framework for aviation safety management. This framework addresses the core elements of the ICAO safety management system (SMS) framework defined in Appendix 2 to Annex 19, includes the elements of the compliance monitoring system, and promotes an integrated approach to the management of an organisation. It facilitates the introduction of the additional safety management components, building upon the existing management system, rather than adding them as a separate framework.

This approach is intended to encourage organisations to embed safety management and risk-based decision-making into all their activities, instead of superimposing another system onto their existing management system and governance structure. In addition, if the organisation holds multiple organisation certificates within the scope of Regulation (EU) 2018/1139, it may choose to implement a single management system to cover all of its activities. An integrated management system may not only be used to capture management system requirements resulting from Regulation (EU) 2018/1139, but also could cover other regulatory frameworks requiring compliance with Annex 19 or other business management systems such as security, occupational health and environmental management systems. Integration will remove any duplication and exploit synergies by managing safety risks across multiple activities. Organisations may determine the best means to structure their management systems to suit their business and organisational needs.

The core part of the management system framework ([145.A.200](#)) focuses on what is essential to manage safety, by mandating the organisation to:

- (a) clearly define accountabilities and responsibilities;
- (b) establish a safety policy and the related safety objectives;
- (c) implement safety reporting procedures in line with just culture principles;
- (d) ensure the identification of aviation safety hazards entailed by its activities, ensure their evaluation, and the management of the associated risks, including:
 - (1) taking actions to mitigate the risks;
 - (2) verifying the effectiveness of the actions taken to mitigate the risks;
- (e) monitor compliance, while considering any additional requirements that are applicable to the organisation;

- (f) keep their personnel trained, competent, and informed about significant safety issues; and
- (g) document all the key management system processes.

Compared with the previous Part-145 quality system ‘framework’ (now covered by point (b) and (e)), the new elements that are introduced by the management system are, in particular, those addressed under points (c) and (d).

Points (a), (b) and (g) address component 1 ‘Safety policy and objectives’ of the ICAO SMS framework. Points (c) and (d)(1) address component 2 ‘Safety Risk Management’ of the ICAO SMS framework. Point (d)(2) addresses component 3 ‘Safety Assurance’ of the ICAO SMS framework. Finally, point (f) addresses component 4 ‘Safety Promotion’ of the ICAO SMS framework.

Point [145.A.200](#) introduces the following as key safety management processes; these are further specified in the related AMC and GM:

- Hazard identification;
- Safety risk management;
- Internal investigation;
- Safety performance monitoring and measurement;
- Management of change;
- Continuous improvement;
- Immediate safety action and coordination with the aircraft operator’s Emergency Response Plan (ERP).

It is important to recognise that safety management will be a continuous activity, as hazards, risks and the effectiveness of safety risk mitigations will change over time.

These key safety management processes are supported by a compliance monitoring function as an integral part of the management system. Most aviation safety regulations constitute generic safety risk controls established by the ‘regulator’. Therefore, ensuring effective compliance with the regulations during daily operations and independent monitoring of compliance are fundamental to any management system for safety. The compliance monitoring function may, in addition, support the follow-up of safety risk mitigation actions. Moreover, where non-compliances are identified through internal audits, the causes will be thoroughly assessed and analysed. Such an analysis in return supports the risk management process by providing insights into causal and contributing factors, including human factors, organisational factors and the environment in which the organisation operates. In this way, the outputs of compliance monitoring become some of the various inputs to the safety risk management functions. Conversely, the output of the safety risk management processes may be used to determine focus areas for compliance monitoring. In this way, internal audits will inform the organisation’s management of the level of compliance within the organisation, whether safety risk mitigation actions have been implemented, and where corrective or preventive action is required. The combination of safety risk management and compliance monitoring should lead to an enhanced understanding of the end-to-end process and the process interfaces, exposing opportunities for increased efficiencies, which are not limited to safety aspects.

As aviation is a complex system with many organisations and individuals interacting together, the primary focus of the key safety management processes is on the organisational processes and procedures, but it also relies on the humans in the system. The organisation and the way in which it operates can have a significant impact on human performance. Therefore, safety management

necessarily addresses how humans can contribute both positively and negatively to an organisation's safety outcomes, recognising that human behaviour is influenced by the organisational environment.

The effectiveness of safety management largely depends on the degree of commitment of the senior management to create a working environment that optimises human performance and encourages personnel to actively engage in and contribute to the organisation's management processes. Similarly, a positive safety culture relies on a high degree of trust and respect between the personnel and the management, and it must therefore be created and supported at the senior management level. If the management does not treat individuals who identify hazards and report adverse events in a consistently fair and just way, those individuals are unlikely to be willing to communicate safety issues or to work with the management to effectively address the safety risks. As with trust, a positive safety culture takes time and effort to establish, and it can be easily lost.

It is further recognised that the introduction of processes for hazard identification and risk assessment, mitigation and verification of the effectiveness of such mitigation actions will create immediate and direct costs, while related benefits are sometimes intangible, and may take time to materialise. Over time, an effective management system will not only address the risks of major occurrences, but also identify and address production inefficiencies, improve communication, foster a better organisational culture, and lead to a more effective control of contractors and suppliers. In addition, through an improved relationship with the authority, an effective management system may result in a reduced oversight burden.

Thus, by viewing safety management and the related organisational policies and key processes as items that are implemented not only to prevent incidents and accidents, but also to meet the organisation's strategic objectives, any investment in safety should be seen as an investment in productivity and organisational success.

AMC1 145.A.200(a)(1) Management system

ED Decision 2022/011/R

ORGANISATION AND ACCOUNTABILITIES

- (a) The management system should encompass safety by including a safety manager and a safety review board in the organisational structure. The functions of the safety manager are those defined in [AMC1 145.A.30\(c\);\(ca\)](#).
- (b) Safety review board
 - (1) The safety review board should be a high-level committee that considers matters of strategic safety in support of the accountable manager's safety accountability.
 - (2) The board should be chaired by the accountable manager and composed of the person or group of persons nominated under points [145.A.30](#).
 - (3) The safety review board should monitor:
 - (i) the safety performance against the safety policy and objectives;
 - (ii) that any safety action is taken in a timely manner; and
 - (iii) the effectiveness of the organisation's management system processes.
 - (4) The safety review board may also be tasked with:
 - (i) reviewing the results of compliance monitoring;
 - (ii) monitoring the implementation of related corrective and preventive actions.

- (c) The safety review board should ensure that appropriate resources are allocated to achieve the established safety objectives.
- (d) Notwithstanding point (a), where justified by the size of the organisation and the nature and complexity of its activities and subject to a risk assessment and agreement by the competent authority, the organisation may not need to establish a formal safety review board. In this case, the tasks normally allocated to the safety review board should be allocated to the safety manager.

GM1 145.A.200(a)(1) Management system

ED Decision 2022/011/R

SAFETY ACTION GROUP

- (a) Depending on the size of the organisation and the nature and complexity of its activities, a safety action group may be established as a standing group or as an ad hoc group to assist, or act on behalf of the safety manager or the safety review board.
- (b) More than one safety action group may be established, depending on the scope of the task and the specific expertise required.
- (c) The safety action group usually reports to, and takes strategic direction from, the safety review board, and may be composed of managers, supervisors and personnel from operational areas.
- (d) The safety action group may be tasked or assist with:
 - (1) monitoring safety performance;
 - (2) defining actions to control risks to an acceptable level;
 - (3) assessing the impact of organisational changes on safety;
 - (4) ensuring that safety actions are implemented within the agreed timescales;
 - (5) reviewing the effectiveness of previous safety actions and safety promotion.

GM2 145.A.200(a)(1) Management system

ED Decision 2022/011/R

MEANING OF THE TERMS 'ACCOUNTABILITY' AND 'RESPONSIBILITY'

In the English language, the notion of accountability is different from the notion of responsibility. Whereas 'accountability' refers to an obligation which cannot be delegated, 'responsibility' refers to an obligation that can be delegated.

AMC1 145.A.200(a)(2) Management system

ED Decision 2022/011/R

SAFETY POLICY AND OBJECTIVES

- (a) The safety policy should:
 - (1) reflect organisational commitments regarding safety, and its proactive and systematic management, including the promotion of a positive safety culture;
 - (2) include internal reporting principles, and encourage personnel to report maintenance-related errors, incidents and hazards;

- (3) recognise the need for all personnel to cooperate with the compliance monitoring and internal investigations referred to under point (c) of [AMC1 145.A.200\(a\)\(3\)](#);
 - (4) be endorsed by the accountable manager;
 - (5) be communicated, with visible endorsement, throughout the organisation; and
 - (6) be periodically reviewed to ensure it remains relevant and appropriate for the organisation.
- (b) The safety policy should include a commitment to:
- (1) comply with all the applicable legislation, to meet all the applicable requirements, and adopt practices to improve safety standards;
 - (2) provide the necessary resources for the implementation of the safety policy;
 - (3) apply human factors principles, including giving due consideration to the aspect of fatigue;
 - (4) enforce safety as a primary responsibility of all managers; and
 - (5) apply 'just culture' principles to internal safety reporting and the investigation of occurrences and, in particular, not to make available or use the information on occurrences:
 - (i) to attribute blame or liability to front-line personnel or other persons for actions, omissions or decisions taken by them that are commensurate with their experience and training; or
 - (ii) for any purpose other than maintaining or improving aviation safety.
- (c) Senior management should continually promote the safety policy to all personnel, demonstrate its commitment to it, and provide necessary human and financial resources for its implementation.
- (d) Taking due account of its safety policy, the organisation should define safety objectives. The safety objectives should:
- (1) form the basis for safety performance monitoring and measurement;
 - (2) reflect the organisation's commitment to maintain or continuously improve the overall effectiveness of the management system;
 - (3) be communicated throughout the organisation; and
 - (4) be periodically reviewed to ensure they remain relevant and appropriate for the organisation.

GM1 145.A.200(a)(2) Management system

ED Decision 2022/011/R

SAFETY POLICY

- (a) The safety policy is the means whereby the organisation states its intention to maintain and, where practicable, improve safety levels in all its activities and to minimise its contribution to the risk of an aircraft accident or serious incident as far as is reasonably practicable. It reflects the management's commitment to safety, and should reflect the organisation's philosophy of safety management, as well as being the foundation on which the organisation's management

system is built. It serves as a reminder of ‘how we do business here’. The creation of a positive safety culture begins with the issuance of a clear, unequivocal policy.

- (b) The commitment to apply ‘just culture’ principles forms the basis for the organisation’s internal rules describing how ‘just culture’ principles are guaranteed and implemented.
- (c) For organisations that have their principal place of business in a Member State, Regulation (EU) No 376/2014 defines the ‘just culture’ principles to be applied (refer in particular to Article 16(11) of that Regulation).

AMC1 145.A.200(a)(3) Management system

ED Decision 2022/011/R

SAFETY MANAGEMENT KEY PROCESSES

- (a) Hazard identification processes
 - (1) A reporting scheme should be the formal means of collecting, recording, analysing, acting on, and generating feedback about hazards, events and the associated risks that may affect safety.
 - (2) The hazards identification should include in particular:
 - (i) hazards that may be linked to human factors issues that affect human performance; and
 - (ii) hazards that may stem from the organisational set-up or the existence of complex operational and maintenance arrangements (such as when multiple organisations are contracted, or when multiple levels of contracting/subcontracting are included).
- (b) Risk management processes
 - (1) A formal safety risk management process should be developed and maintained that ensures reactive, proactive and predictive approach composed by:
 - (i) analysis (e.g. in terms of the probability and severity of the consequences of hazards and occurrences);
 - (ii) assessment (in terms of tolerability);
 - (iii) control (in terms of mitigation) of risks to an acceptable level.

Note: The severity of the consequence should be evaluated to the best knowledge and engineering judgement of the organisation, and this evaluation may require collecting information from the competent authority, incident/accident investigation reports, the design approval holder, etc.

 - (2) The levels of management who have the authority to make decisions regarding the tolerability of safety risks, in accordance with (b)(1)(ii), should be specified.
- (c) Internal investigation
 - (1) In line with its just culture policy, the organisation should define how to investigate incidents such as errors or near misses, in order to understand not only what happened, but also how it happened, to prevent or reduce the probability and/or consequence of future recurrences (refer to [AMC1 145.A.202](#)). This approach should avoid concentrating the analysis on who was (were) directly or indirectly concerned by the events.

- (2) The scope of internal investigations should extend beyond the scope of the occurrences required to be reported to the competent authority in accordance with point [145.A.60](#), to include the reports referred to in [145.A.202\(b\)](#).
- (d) Safety performance monitoring and measurement
- (1) Safety performance monitoring and measurement should be the processes by which the safety performance of the organisation is verified in comparison with the safety policy and the safety objectives.
- (2) These processes may include, as appropriate to the size, nature and complexity of the organisation:
- (i) safety reporting, which may also address the status of compliance with the applicable requirements;
 - (ii) safety reviews, including trend reviews, which would be conducted during the introduction of new products and their components, new equipment/technologies, the implementation of new or changed procedures, or in situations of organisational changes that may have an impact on safety;
 - (iii) safety audits that focus on the integrity of the organisation's management system, and on periodically assessing the status of safety risk controls;
 - (iv) safety surveys, examining particular elements or procedures in a specific area, such as identified problem areas, or bottlenecks in daily maintenance activities, perceptions and opinions of maintenance management personnel, and areas of dissent or confusion; and
 - (v) other indicators relevant to safety performance, which may be generated by automated means.
- (e) Management of change
- Changes may introduce new hazards or threaten existing safety risk controls. The management of change should be a documented process established by the organisation to identify external and internal changes that may have an adverse effect on the safety of its maintenance activities. It should make use of the organisation's existing hazard identification, risk assessment and mitigation processes.
- (f) Continuous improvement
- The organisation should continuously seek to improve its safety performance and the effectiveness of its management system. Continuous improvement may be achieved through:
- (1) audits carried out by external organisations;
 - (2) assessments, including assessments of the effectiveness of the safety culture and management system, in particular to assess the effectiveness of the safety risk management processes;
 - (3) staff surveys, including cultural surveys, that can provide useful feedback on how engaged personnel are with the management system;
 - (4) monitoring the recurrence of incidents and occurrences;
 - (5) evaluation of safety performance indicators and reviews of all the available safety performance information; and
 - (6) the identification of lessons learned.

- (g) Immediate safety action and coordination with the operator's Emergency Response Plan (ERP)
- (1) Procedures should be implemented that enable the organisation to act promptly when it identifies safety concerns with the potential to have an immediate effect on flight safety, including clear instructions on who to contact at the owner/operator/CAMO, and how to contact them, including outside of normal business hours. These provisions are without prejudice to the occurrence reporting required by point [145.A.60](#).
 - (2) If applicable, procedures should be implemented to enable the organisation to react promptly if the ERP is triggered by the operator and it requires the support of the Part-145 organisation.

GM1 145.A.200(a)(3) Management system

ED Decision 2022/011/R

SAFETY RISK MANAGEMENT — INTERFACES BETWEEN ORGANISATIONS

- (a) Safety risk management processes should specifically address the planned implementation of, or participation of the organisation in, complex operational and maintenance arrangements (such as when multiple organisations are contracted, or when multiple levels of contracting/subcontracting are included).
- (b) Hazard identification and risk assessment start with the identification of all the parties involved in the arrangement, including independent experts and non-approved organisations. This identification process extends to cover the overall control structure, and assesses in particular the following elements across all subcontract levels and all parties within such arrangements:
 - (1) coordination and interfaces between the different parties;
 - (2) applicable procedures;
 - (3) communication between all the parties involved, including reporting and feedback channels;
 - (4) task allocation, responsibilities and authorities; and
 - (5) the qualifications and competency of key personnel with reference to point 145.A.30.
- (c) Safety risk management should focus on ensuring the following aspects:
 - (1) clear assignment of accountability and allocation of responsibilities;
 - (2) that only one party is responsible for a specific aspect of the arrangement, with no overlapping or conflicting responsibilities, in order to eliminate coordination errors;
 - (3) the existence of clear reporting lines, both for occurrence reporting and progress reporting;
 - (4) the possibility for staff to directly notify the organisation of any hazard that suggests an obviously unacceptable safety risk as a result of the potential consequences of this hazard.
- (d) The safety risk management processes should ensure that there is regular communication between all the parties involved to discuss work progress, risk mitigation actions, and changes to the arrangements, as well as any other significant issues.

GM2 145.A.200(a)(3) Management system

ED Decision 2022/011/R

MANAGEMENT OF CHANGE

- (a) Unless they are properly managed, changes in organisational structure, facilities, the scope of work, personnel, documentation, policies and procedures, etc. can result in the inadvertent introduction of new hazards, and expose the organisation to new or increased risks. Effective organisations seek to improve their processes, with conscious recognition that changes can expose the organisation to potentially latent hazards and risks if they are not properly and effectively managed.
- (b) Regardless of the magnitude of a change, large or small, its safety implications should always be proactively considered. This is primarily the responsibility of the team that proposes and/or implements the change. However, a change can only be successfully implemented if all the personnel affected by the change are engaged, are involved and participate in the process. The magnitude of a change, its safety criticality, and its potential impact on human performance should be assessed in any change management process.
- (c) The process for the management of change typically provides principles and a structured framework for managing all aspects of the change. Disciplined application of the management of change can maximise the effectiveness of the change, engage the staff, and minimise the risks that are inherent in a change.
- (d) The introduction of a change is the trigger for the organisation to perform their hazard identification and risk management processes.

Some examples of change include, but are not limited to:

- (1) changes to the organisational structure;
 - (2) the inclusion of a new aircraft type in the terms of approval;
 - (3) the addition of aircraft of the same or a similar type;
 - (4) significant changes in personnel (affecting key personnel and/or large numbers of personnel, high turnover);
 - (5) new or amended regulations;
 - (6) changes to the security arrangements;
 - (7) changes in the economic situation of an organisation (e.g. commercial or financial pressure);
 - (8) new schedule(s), location(s), equipment, and/or operational procedures; and
 - (9) the addition of new subcontractors.
- (e) A change may have the potential to introduce new, or to exacerbate pre-existing, human factors issues. For example, changes in computer systems, equipment, technology, personnel changes, including changes in management personnel, procedures, work organisation, or work processes are likely to affect performance.
 - (f) The purpose of integrating human factors (HF) into the management of change is to minimise potential risks by specifically considering the impact of the change on the people within a system.

- (g) Special consideration, including any HF issues, should be given to the ‘transition period’. In addition, the activities utilised to manage these issues should be integrated into the change management plan.
- (h) Effective management of change should be supported by the following:
 - (1) implementation of a process for formal hazard identification/risk assessment for major operational changes, major organisational changes, changes in key personnel, and changes that may affect the way maintenance is carried out;
 - (2) identification of changes that are likely to occur in business which would have a noticeable impact on:
 - (i) resources — material and human;
 - (ii) management direction — policies, processes, procedures, training; and
 - (iii) management control;
 - (3) safety cases/risk assessments that are focused on aviation safety;
 - (4) the involvement of key stakeholders in the change management process, as appropriate.
- (i) During the management of change process, previous risk assessments and existing hazards are reviewed for possible effect.

AMC1 145.A.200(a)(4) Management system

ED Decision 2022/011/R

COMMUNICATION ON SAFETY

- (a) The organisation should establish communication regarding safety matters that:
 - (1) ensures that all personnel are aware of the safety management activities, as appropriate for their safety responsibilities;
 - (2) conveys safety-critical information, especially related to assessed risks and analysed hazards;
 - (3) explains why particular actions are taken; and
 - (4) explains why safety procedures are introduced or changed.
- (b) Regular meetings with personnel, at which information, actions, and procedures are discussed, may be used to communicate safety matters.

GM1 145.A.200(a)(4) Management system

ED Decision 2022/011/R

SAFETY PROMOTION

- (a) Safety training, combined with safety communication and information sharing, forms part of safety promotion.
- (b) Safety promotion activities should support:
 - (1) the organisation’s policies, encouraging a positive safety culture, creating an environment that is favourable to the achievement of the organisation’s safety objectives;
 - (2) organisational learning; and

- (3) the implementation of an effective safety reporting scheme and the development of a just culture.
- (c) Depending on the particular safety issue, safety promotion may also constitute or complement risk mitigation actions.
- (d) Qualifications and training aspects are further specified in the AMC and the GM to point [145.A.30](#).

GM1 145.A.200(a)(5) Management system

ED Decision 2022/011/R

MANAGEMENT SYSTEM DOCUMENTATION

- (a) The organisation may document its safety policy, safety objectives and all its key management system processes in a separate manual (e.g. a Safety Management Manual or Management System Manual), or in its MOE (see [AMC1 145.A.70\(a\)](#), Part 3 ‘Management system procedures’). Organisations that hold multiple organisation certificates within the scope of Regulation (EU) 2018/1139 may prefer to use a separate manual in order to avoid duplication. That manual or the MOE, depending on the case, should be the key instrument for communicating the approach to the management system for the whole of the organisation.
- (b) The organisation may also choose to document some of the information that is required to be documented in separate documents (e.g. policy documents, procedures). In that case, it should ensure that the manual or the MOE contains adequate references to any document that is kept separately. Any such documents are to be considered to be integral parts of the organisation’s management system documentation.

AMC1 145.A.200(a)(6) Management system

ED Decision 2022/011/R

COMPLIANCE MONITORING — GENERAL

- (a) The primary objectives of compliance monitoring are to provide an independent monitoring function on how the organisation ensures compliance with the applicable requirements, policies and procedures, and to request action where non-compliances are identified.
- (b) The independence of the compliance monitoring should be established by always ensuring that audits and inspections are carried out by personnel who are not responsible for the functions, procedures or products that are audited or inspected.

AMC2 145.A.200(a)(6) Management system

ED Decision 2022/011/R

COMPLIANCE MONITORING — INDEPENDENT AUDIT

- (a) An essential element of the compliance monitoring function is the independent audit.
- (b) The independent audit should be an objective process of routine sample checks of all aspects of the organisation’s ability to carry out all maintenance to the standards required by this Regulation. It should include checking compliance of the organisation procedures with the Regulation, adherence of the organisation to these procedures, and product or maintenance sampling (i.e. product audit), as this is the end result of the maintenance process.
- (c) The independent audit should provide an objective overview of the complete set of maintenance-related activities. It should include a percentage of unannounced audits carried

out on a sample basis while maintenance is being carried out. This means that some audits should be carried out during the night for those organisations that work at night.

- (d) The organisation should establish an audit plan to show when and how often the activities as required by this Regulation will be audited.
- (e) Except as specified in points (h) and (j), the audit plan should ensure that all aspects of [Part-145](#) compliance are verified every year, including all the subcontracted activities. The auditing may be carried out as a complete single exercise or subdivided over the annual period. The independent audit should not require each procedure to be verified against each product line when it can be shown that the particular procedure is common to more than one product line and the procedure has been verified every year without resultant findings. Where findings have been identified, compliance with the particular procedure should be verified against other product lines until the findings have been closed, after which the independent audit procedure may revert back to a yearly interval for the particular procedure.
- (f) Except as specified otherwise in point (h), the independent audit should sample check one product (such as one aircraft or engine or component) while undergoing maintenance on each product line every year as a demonstration of compliance with the maintenance procedures and requirements associated with that specific product. This should include in particular the verification of:
- the maintenance data and compliance with the organisation procedures, including consideration of human factors issues;
 - the facility and maintenance environment;
 - the standard of inspection and precautions;
 - the completion of work cards/worksheet;
 - the tools and material;
 - the authorisation of the person carrying out maintenance.

For the purpose of this AMC, a product line includes any product under an Appendix II approval class rating as specified in the terms of approval issued to the particular organisation.

It therefore follows, for example, that a Part-145 maintenance organisation approved to maintain aircraft, engines, brakes and autopilots would need to carry out at least four complete product audits each year, except as specified otherwise in points (f), (h) or (j).

- (g) The product audit includes witnessing any relevant testing and visually inspecting the product and the associated documentation. The product audit should not involve repeated disassembly or testing unless the product audit identifies findings that require such an action.
- (h) Except as specified otherwise in point (j), where the organisation contracts the independent audit element of the compliance monitoring function in accordance with point (l), the audit should be carried out twice every year.
- (i) Except as specified otherwise in point (j), where the organisation has line stations listed as per point [145.A.75\(d\)](#), the compliance monitoring documentation should include a description of how these line stations are integrated into the monitoring and include a plan to audit each listed line station at a frequency consistent with the extent of flight activity at the particular line station and the related safety hazards identified. Except as specified otherwise in point (j), the maximum period between audits of a particular line station should not exceed 2 years.

- (j) Except as specified otherwise in point (f), provided that there are no safety-related findings, the audit planning cycle specified in this AMC may be increased by up to 100 %, subject to a risk assessment and/or mitigation actions, and agreement by the competent authority.
- (k) A report should be issued each time an audit is carried out describing what was checked and the resulting non-compliance findings against applicable requirement and procedures.
- (l) Organisations with a maximum of 10 maintenance staff actively engaged in carrying out maintenance may subcontract the whole independent audit element of the compliance monitoring function to another organisation or contract a qualified and competent person to become responsible for this element, with the agreement of the competent authority.

This does not prevent a larger organisation from occasionally using external support for conducting particular audits.

AMC3 145.A.200(a)(6) Management system

ED Decision 2022/011/R

COMPLIANCE MONITORING — CONTRACTING OF THE INDEPENDENT AUDIT

- (a) If external personnel are used to perform independent audits:
 - (1) any such audits should be performed under the responsibility of the compliance monitoring manager; and
 - (2) the organisation remains responsible for ensuring that the external personnel have the relevant knowledge, background, and experience that are appropriate to the activities being audited, including knowledge and experience in compliance monitoring.
- (b) The organisation retains the ultimate responsibility for the effectiveness of the compliance monitoring function, in particular for the effective implementation and follow-up of all corrective actions.

AMC4 145.A.200(a)(6) Management system

ED Decision 2022/011/R

COMPLIANCE MONITORING — FEEDBACK SYSTEM

- (a) Another essential element of the compliance monitoring function is the feedback system.
- (b) The feedback system should not be contracted to external persons or organisations.
- (c) When a non-compliance is found, the compliance monitoring function should ensure that the root cause(s) and contributing factor(s) are identified (see [GM1 145.A.95](#)), and that corrective actions are defined. The feedback part of the compliance monitoring function should define who is required to address any non-compliance in each particular case, and the procedure to be followed if the corrective action is not completed within the defined time frame. The principal functions of the feedback system are to ensure that all findings resulting from the independent audits of the organisation are properly investigated and corrected in a timely manner, and to enable the accountable manager to be kept informed of safety issues and the extent of compliance with [Part-145](#).
- (d) The independent audit reports referred to in [AMC2 145.A.200\(a\)\(6\)](#) should be sent to the relevant department(s) for corrective action, giving target closure dates. These target dates should be discussed with the relevant department(s) before the compliance monitoring function confirms the dates in the report. The relevant department(s) is (are) required to

implement the corrective action and inform the compliance monitoring function of the status of the implementation of the action.

- (e) Unless the review of the results from compliance monitoring is given to the safety review board (ref. [AMC1 145.A.200\(a\)\(1\)](#) point (b)(4)), the accountable manager should hold regular meetings with staff to check the progress of corrective actions. These meetings may be delegated to the compliance monitoring manager on a day-to-day basis, provided that the accountable manager:
 - (1) meets the senior staff involved at least twice per year to review the overall performance of the compliance monitoring function; and
 - (2) receives at least a half-yearly summary report on non-compliance findings.
- (f) All records pertaining to the independent audit and the feedback system should be retained for the period specified in point [145.A.55\(c\)](#) or for such periods as to support changes to the audit planning cycle in accordance with [AMC2 145.A.200\(a\)\(6\)](#), whichever is the longer.

GM1 145.A.200(a)(6) Management system

ED Decision 2022/011/R

COMPLIANCE MONITORING FUNCTION

The compliance monitoring function is one of the elements that is required to be in compliance with the applicable requirements. This means that the compliance monitoring function itself should be subject to independent monitoring of compliance in accordance with [145.A.200\(a\)\(6\)](#).

GM2 145.A.200(a)(6) Management system

ED Decision 2022/011/R

COMPLIANCE MONITORING — AUDIT PLAN

- (a) The purpose of this GM is to provide guidance on one acceptable working audit plan to meet part of the needs of point [145.A.200\(a\)\(6\)](#). There is any number of other acceptable working audit plans.
- (b) The audits described in the audit plan are intended to monitor compliance with the applicable requirements, and at the same time to review all areas of the organisation to which those requirements are applicable.
- (c) In order to achieve this objective, as a first element, the organisation needs to identify all the regulatory requirements that are applicable to the activity and the scope of work under consideration, to allow the audit plan to focus on the relevant topics. Each topic (e.g. facilities, personnel, etc.) should be cross-referred with the relevant requirement and the related procedure of the organisation in the exposition that describes the particular topic. If the organisation follows a specific means of compliance to demonstrate compliance with the rule, that information may also be stated.
- (d) As a second element, all the functional areas of the organisation in which [Part-145](#) functions are intended to be carried out (i.e. the types of maintenance-related activities), including subcontracting, need to be listed in order to identify the applicability of any topic to each functional area.
- (e) A matrix can be used, as shown in the example below, to capture the two elements mentioned above. This matrix is intended to be a living document to be customised by each particular organisation depending on its scope of work and its structure. This matrix should represent the overall compliance of the audit system, and needs to be amended, as necessary, based upon

any change to the applicable regulations, the procedures of the organisation or the functional areas of the organisation (e.g. a change in the scope of work to include line maintenance, etc.)

Example (to be further completed) of an audit matrix for an organisation involved in aircraft base maintenance that does not hold airworthiness review privilege:

Topic	Requirement	Exposition	Functional areas				
			Base maintenance	Compliance monitoring	Subcontracting	Component workshop	...
Facilities	145.A.25(a)(1)	1.8	X	N/A	X	X	...
	AMC 145.A.25(a)	2.22	X	N/A	N/A	X	...

Personnel
	145.A.30(c)	1.4	N/A	X	N/A	N/A	...
	145.A.30(d)	1.7, 2.22	X	X	X	X	...

	145.A.37	N/A	N/A	N/A	N/A	N/A	...
...	
Record-keeping	145.A.55

...

- (f) The audit plan can be presented as a simplified schedule (see below), showing the operational areas of the organisation (i.e. where the maintenance-related activities are effectively carried out) against a timetable to indicate when each particular area was scheduled for audit and when the audit was completed. The audit plan should include a number of product audits (depending on the number of product lines), some of which should be unannounced (see [AMC2 145.A.200\(a\)\(6\)](#)).

Example (to be further completed) of an audit plan for an organisation, mentioned in point (e), that has two base maintenance hangars, and hydraulic and electrical workshops:

Operational area	Functional area	Planned	Completed	Remarks
Base maintenance hangar 1	Base maintenance	mmm yyyy	dd mmm yyyy	
Base maintenance hangar 2	Base maintenance	mmm yyyy	dd mmm yyyy	
Hydraulic workshop	Component workshop	mmm yyyy	dd mmm yyyy	
Electrical workshop	Component workshop	mmm yyyy	dd mmm yyyy	
Subcontractor 1	Subcontracting	mmm yyyy	dd mmm yyyy	
Product audit 1	Base maintenance	mmm yyyy	dd mmm yyyy	During night
Product audit 2	Component workshop	unannounced	dd mmm yyyy	
...	

(g) The audit of each operational area will review all the topics that are applicable to the relevant functional area. For each topic, the audit should check that the particular Part-145 requirement is documented in the corresponding procedure in the exposition, and that the procedure is effectively implemented in the operational area that is being audited. In addition, the audit should also identify any practice/process implemented in the operational area which has not been documented in any procedure in the exposition.

GM1 145.A.200(a)(6) and 145.B.300 Management system and Oversight principles

ED Decision 2022/011/R

THE USE OF INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT) FOR PERFORMING REMOTE AUDITS

This GM provides technical guidance on the use of remote information and communication technologies (ICT) to support:

- competent authorities when overseeing regulated organisations;
- regulated organisations when conducting internal audits/monitoring compliance of their organisation with the relevant requirements, and when evaluating vendors, suppliers and subcontractors.

In the context of this GM:

- ‘remote audit’ means an audit that is performed with the use of any real-time video and audio communication tools instead of the physical presence of the auditor on-site; the specificities of each type of approval need to be considered in addition to the general overview (described below) when applying the ‘remote audit’ concept;
- ‘auditing entity’ means the competent authority or organisation that performs the remote audit;
- ‘auditee’ means the entity being audited/inspected (or the entity audited/inspected by the auditing entity via a remote audit);

It is the responsibility of the auditing entity to assess whether the use of remote ICT constitutes a suitable alternative to the physical presence of an auditor on-site in accordance with the applicable requirements.

THE CONDUCT OF A REMOTE AUDIT

The auditing entity that decides to conduct a remote audit should describe the remote audit process in its documented procedures and should consider at least the following elements:

- The methodology for the use of remote ICT is sufficiently flexible and non-prescriptive in nature to optimise the conventional audit process.
- Adequate controls are defined and are in place to avoid abuses that could compromise the integrity of the audit process.
- Measures to ensure that the security and confidentiality are maintained throughout the audit activities (data protection and intellectual property of the organisation also need to be safeguarded).

Examples of the use of remote ICT during audits may include but are not limited to:

- meetings by means of teleconference facilities, including audio, video and data sharing;

- assessment of documents and records by means of remote access, in real time;
- recording, in real time during the process, of evidence to document the results of the audit, including non-conformities, by means of exchange of emails or documents, instant pictures, video or/and audio recordings;
- visual (livestream video) and audio access to facilities, stores, equipment, tools, processes, operations, etc.

An agreement between the auditing entity and the auditee should be established when planning a remote audit, which should include the following:

- determining the platform for hosting the audit;
- granting security and/or profile access to the auditor(s);
- testing platform compatibility between the auditing entity and the auditee prior to the audit;
- considering the use of webcams, cameras, drones, etc. when the physical evaluation of an event (product, part, process, etc.) is desired or is necessary;
- establishing an audit plan which will identify how remote ICT will be used and the extent of their use for the audit purposes to optimise their effectiveness and efficiency while maintaining the integrity of the audit process;
- if necessary, time zone acknowledgement and management to coordinate reasonable and mutually agreeable convening times;
- a documented statement of the auditee that they shall ensure full cooperation and provision of the actual and valid data as requested, including ensuring any supplier or subcontractor cooperation, if needed; and
- data protection aspects.

The following equipment and set-up elements should be considered:

- the suitability of video resolution, fidelity, and field of view for the verification being conducted;
- the need for multiple cameras, imaging systems, or microphones, and whether the person that performs the verification can switch between them, or direct them to be switched and has the possibility to stop the process, ask a question, move the equipment, etc.;
- the controllability of viewing direction, zoom, and lighting;
- the appropriateness of audio fidelity for the evaluation being conducted; and
- real-time and uninterrupted communication between the person(s) participating to the remote audit from both locations (on-site and remotely).

When using remote ICT, the auditing entity and the other persons involved (e.g. drone pilots, technical experts) should have the competence and ability to understand and utilise the remote ICT tools employed to achieve the desired results of the audit(s)/assessment(s). The auditing entity should also be aware of the risks and opportunities of the remote ICT used and the impacts they may have on the validity and objectivity of the information gathered.

Audit reports and related records should indicate the extent to which remote ICT have been used in conducting remote audits and the effectiveness of remote ICT in achieving the audit objectives, including any item that has not been able to be completely reviewed.

145.A.202 Internal safety reporting scheme

Regulation (EU) 2021/1963

- (a) As part of its management system, the organisation shall establish an internal safety reporting scheme to enable the collection and evaluation of such occurrences that are to be reported under point [145.A.60](#).
- (b) The scheme shall also enable the collection and evaluation of those errors, near misses and hazards reported internally that do not fall under point (a).
- (c) Through that scheme, the organisation shall:
 - (1) identify the causes of, and contributing factors to, the errors, near misses and hazards reported, and address them as part of its safety risk management process in accordance with point [145.A.200\(a\)\(3\)](#);
 - (2) ensure an evaluation of all known, relevant information relating to errors, near misses, hazards and the inability to follow procedures, and a method to circulate the information as necessary.
- (d) The organisation shall make arrangements to ensure the collection of safety issues related to subcontracted activities.

AMC1 145.A.202 Internal safety reporting scheme

ED Decision 2022/011/R

- (a) Each internal safety reporting scheme should ensure confidentiality and enable and encourage free and frank reporting of any potentially safety-related occurrence, including incidents such as errors or near misses, safety issues and identified hazards. This will be facilitated by the establishment of a just culture.
- (b) The internal safety reporting scheme should contain the following elements:
 - (1) clearly identified aims and objectives with demonstrable corporate commitment;
 - (2) a just culture policy as part of the safety policy, and related just culture implementation procedures;
 - (3) a process to:
 - (i) identify those reports which require investigation; and
 - (ii) when so identified, investigate all the causal and contributing factors, including technical, organisational, managerial, or human factors issues, and any other contributing factors related to the occurrence, incident, error or near miss that was identified;
 - (iii) if adapted to the size and complexity of the organisation, analyse the collective data showing the trends and frequencies of the contributing factors;
 - (4) appropriate corrective actions based on the findings of investigations;
 - (5) initial and recurrent training for staff involved in internal investigations;
 - (6) where relevant, the organisation should cooperate with the owner, operator or CAMO on occurrence investigations by exchanging relevant information to improve aviation safety.

- (c) The internal safety reporting scheme should:
 - (1) ensure the confidentiality of the reporter;
 - (2) be closed loop, to ensure that actions are taken internally to address safety issues and hazards; and
 - (3) feed into the recurrent training as defined in [AMC3 145.A.30\(e\)](#) whilst maintaining the appropriate confidentiality.
- (d) Feedback should be given to staff both on an individual and a more general basis to ensure their continued support of the safety reporting scheme.

GM1 145.A.202 Internal safety reporting scheme

ED Decision 2022/011/R

GENERAL

- (a) The overall purpose of the internal safety reporting scheme is to collect information reported by the organisation personnel and use this reported information to improve the level of compliance and safety performance of the organisation. The purpose is not to attribute blame.
- (b) The objectives of the scheme are to:
 - (1) enable an assessment to be made of the safety implications of each relevant incident (errors, near miss), safety issue and hazard reported, including previous similar issues, so that any necessary action can be initiated; and
 - (2) ensure that knowledge of relevant incidents, safety issues and hazards is shared so that other persons and organisations may learn from them.
- (c) The scheme is an essential part of the overall monitoring function and should be complementary to the normal day-to-day procedures and 'control' systems; it is not intended to duplicate or supersede any of them. The scheme is a tool to identify those instances in which routine procedures have failed or may fail.
- (d) All reports should be retained, as the significance of such reports may only become obvious at a later date.
- (e) The collection and analysis of timely, appropriate and accurate data will allow the organisation to react to the information that it receives, and to take the necessary action.

145.A.205 Contracting and subcontracting

Regulation (EU) 2021/1963

- (a) The organisation shall ensure that when contracting or subcontracting any part of its maintenance activities:
 - (1) the maintenance conforms to the applicable requirements;
 - (2) any aviation safety hazard associated with such contracting or subcontracting is considered as part of the organisation's management system.
- (b) If the organisation subcontracts any part of its maintenance activities to another organisation, the subcontracted organisation shall work under the scope of approval of the subcontracting organisation.

GM1 145.A.205 Contracting and subcontracting

ED Decision 2022/011/R

RESPONSIBILITY WHEN CONTRACTING OR SUBCONTRACTING MAINTENANCE

- (a) Regardless of the approval status of the subcontracted organisations, a [Part-145](#) organisation is responsible for ensuring that all subcontracted activities are subject to hazard identification and risk management, as required by point [145.A.200\(a\)\(3\)](#), and to compliance monitoring, as required by point [145.A.200\(a\)\(6\)](#).
- (b) A Part-145 organisation is responsible for identifying hazards that may stem from the existence of complex maintenance arrangements (such as when multiple organisations are contracted, or when multiple levels of contracting/subcontracting are included) with due regard to the organisations' interfaces (see [GM1 145.A.200\(a\)\(3\)](#)). In addition, the compliance monitoring function should at least check that the approval of the contracted maintenance organisation(s) effectively covers the contracted activities, and that it is still valid.
- (c) A Part-145 organisation is responsible for ensuring that interfaces and communication channels are established with the contracted maintenance organisation(s) for occurrence reporting. This does not replace the obligation of the contracted organisation(s) to report to the competent authority in accordance with Regulation (EU) No 1321/2014.

For subcontracted activities, interfaces and communication channels are also needed for the purpose of the internal safety reporting scheme ([145.A.202](#)).

GM2 145.A.205 Contracting and subcontracting

ED Decision 2022/011/R

DIFFERENCE BETWEEN 'CONTRACTING MAINTENANCE' AND 'SUBCONTRACTING MAINTENANCE'

- (a) 'Subcontracting maintenance' means subcontracting to a third party under the maintenance organisation management system.

This is the case when a third party carries out certain maintenance tasks on behalf of the [Part-145](#) organisation, and the responsibility remains with the Part-145 organisation (this Part-145 organisation must have the tasks within its scope of approval). Whether the third party is approved or not is not relevant for the designation of subcontracting, since the third party will be working under the management system of the Part-145 organisation, and the maintenance will be released under the approval of this organisation.

- (b) 'Contracting maintenance' means contracting to another maintenance organisation which will release the maintenance under its own approval.

This is the case when a Part-145 organisation, contracted to carry out maintenance by an owner/operator/CAMO, further contracts certain maintenance tasks to another approved Part-145 organisation, and transfers the responsibility for the release of such tasks to the second Part-145 organisation.

Contracting should only be envisaged when it is allowed by the person or organisation that requests the maintenance.

- (c) In case (a), the subcontracted organisation works under the approval of the contracting organisation, whereas in case (b), the contracted organisation works under its own approval.

SECTION B — AUTHORITY REQUIREMENTS

145.B.005 Scope

Regulation (EU) 2021/1963

This section establishes the conditions for conducting the certification, oversight and enforcement tasks as well as the administrative and management system requirements to be followed by the competent authority that is responsible for the implementation and enforcement of Section A.

145.B.115 Oversight documentation

Regulation (EU) 2021/1963

The competent authority shall provide all the legislative acts, standards, rules, technical publications, and related documents to the relevant personnel in order to allow them to perform their tasks and to discharge their responsibilities.

145.B.120 Means of compliance

Regulation (EU) 2021/1963

- (a) The Agency shall develop acceptable means of compliance (“AMC”) that may be used to establish compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (b) Alternative means of compliance may be used to establish compliance with this Regulation.
- (c) Competent authorities shall inform the Agency of any alternative means of compliance used by organisations under their oversight or by themselves for establishing compliance with this Regulation.

GM1 145.B.120 Means of compliance

ED Decision 2022/011/R

ALTERNATIVE MEANS OF COMPLIANCE — GENERAL

- (a) A competent authority may establish means to comply with the Regulation different from the AMC established by EASA.

In that case, the competent authority is responsible for demonstrating how these alternative means of compliance (AltMoC) establish compliance with the Regulation.

- (b) AltMoC used by a competent authority, or by an organisation under its oversight, may be used by other competent authorities, or another organisation, only if processed again in accordance with respectively point [145.B.120](#) and point [145.A.120](#).
- (c) AltMoC issued by the competent authority may cover the following cases:
 - AltMoC to be used by organisations under the oversight of the competent authority and made available to these organisations;
 - AltMoC to be used by the authority itself to discharge its responsibilities.

AMC1 145.B.120(b);(c) Means of compliance

ED Decision 2022/011/R

PROCESSING THE ALTERNATIVE MEANS OF COMPLIANCE

To meet the objective of points (b) and (c) of point [145.B.120](#):

- (a) the competent authority should establish the means to consistently evaluate over time that all the AltMoC used by itself or by organisations under its oversight allow for the establishment of compliance with the Regulation.
- (b) If the competent authority issues AltMoC for itself or for the organisations under its oversight, it should:
 - make them available to all relevant organisations;
 - notify the Agency as soon as the AltMoC is issued, including the information described in point (d) below.
- (c) The competent authority should evaluate the AltMoC proposed by an organisation by analysing the documentation provided and, if considered necessary, inspecting the organisation.

When the competent authority finds that the AltMoC is in accordance with the Regulation, it should:

- notify the applicant that the AltMoC is approved;
 - indicate that this AltMoC may be implemented, and agree when the MOE is to be amended; and
 - notify the Agency as soon as the AltMoC is approved, including the information described in point (d) below.
- (d) The competent authority should provide the Agency with the following information:
 - a summary of the AltMoC;
 - the content of the AltMoC;
 - a statement that compliance with the Regulation is achieved; and
 - in support of that statement, an assessment demonstrating that the AltMoC reaches an acceptable level of safety, taking into account the level of safety provided by the corresponding EASA AMC.

All these elements describing the AltMoC form an integral part of the records to be kept in accordance with [145.B.220](#).

GM1 145.B.120(b);(c) Means of Compliance

ED Decision 2022/011/R

CASE WHERE THE REGULATION HAS NO CORRESPONDING EASA AMC

When there is no EASA AMC for a certain requirement in the Regulation, the competent authority may choose to develop national guides or other types of documents to help the organisations under its oversight in compliance demonstration. The competent authority may inform the Agency, so that such guides or other documents may later be considered for transposition into an AMC published by the Agency through the Agency rulemaking process.

145.B.125 Information to the Agency

Regulation (EU) 2021/1963

- (a) The competent authority of the Member State shall notify the Agency in case of any significant problems with the implementation of Regulation (EU) 2018/1139 and its delegated and implementing acts within 30 days from the time the authority became aware of the problems.
- (b) Without prejudice to Regulation (EU) No 376/2014 and its delegated and implementing acts, the competent authority shall provide the Agency as soon as possible with any safety-significant information stemming from the occurrence reports stored in the national database pursuant to Article 6(6) of Regulation (EU) No 376/2014.

AMC1 145.B.125(b) Information to the Agency

ED Decision 2022/011/R

EXCHANGE OF SAFETY-SIGNIFICANT INFORMATION WITH THE AGENCY

Each competent authority should appoint a coordinator to act as the contact point for the exchange of safety-significant information between the competent authority and the Agency.

GM1 145.B.125(b) Information to the Agency

ED Decision 2022/011/R

MEANING OF SAFETY-SIGNIFICANT INFORMATION STEMMING FROM THE OCCURRENCE REPORTS

‘Safety-significant information stemming from the occurrence reports’ means:

- (a) a conclusive safety analysis which summarises individual occurrence data and provides an in-depth analysis of a safety issue, and which may be relevant for the Agency’s safety action planning; and
- (b) individual occurrence data for the cases where the Agency is the competent authority, and which fulfils the reporting criteria of [GM3 145.B.125\(b\)](#).

GM2 145.B.125(b) Information to the Agency

ED Decision 2022/011/R

RECOMMENDED CONTENT FOR CONCLUSIVE SAFETY ANALYSES

A conclusive safety analysis should contain the following:

- (a) a detailed description of the safety issue, including the scenario in which the safety issue takes place; and
- (b) an indication of the stakeholders affected by the safety issue, including types of operations and organisations;

and, as appropriate:

- (c) a risk assessment establishing the severity and probability of all the possible consequences of the safety issue;
- (d) information about the existing safety barriers that the aviation system has in place to prevent the likely safety issue consequences from occurring;
- (e) any mitigating actions already in place or developed to deal with the safety issue;
- (f) recommendations for future actions to control the risk; and

- (g) any other element the competent authority considers essential for the Agency to properly assess the safety issue.

GM3 145.B.125(b) Information to the Agency

ED Decision 2022/011/R

OCCURRENCES WHERE THE AGENCY IS THE COMPETENT AUTHORITY

Occurrences related to organisations or products, certified by the Agency, should be notified to the Agency if:

- (a) the occurrence is defined as a reportable occurrence in accordance with the applicable regulation;
- (b) the organisation responsible for addressing the occurrence is certified by the Agency; and
- (c) the Member State competent authority has come to the conclusion that:
 - (1) the organisation certified by the Agency to which the occurrence relates has not been informed of the occurrence; or
 - (2) the occurrence has not been properly addressed or has been left unattended by the organisation certified by the Agency.

Such occurrence data should be reported in a format compatible with the European Coordination Centre for Accident and Incident Reporting Systems (ECCAIRS) and should provide all relevant information for its assessment and analysis, including necessary additional files in the form of attachments.

145.B.135 Immediate reaction to a safety problem

Regulation (EU) 2021/1963

- (a) Without prejudice to Regulation (EU) No 376/2014 and its delegated and implementing acts, the competent authority shall implement a system to appropriately collect, analyse and disseminate safety information.
- (b) The Agency shall implement a system to appropriately analyse any relevant safety information received and, without undue delay, provide the relevant authority of the Member States and the Commission with any information, including recommendations or corrective actions to be taken, that is necessary for them to react in a timely manner to a safety problem involving products, parts, appliances, persons or organisations that are subject to Regulation (EU) 2018/1139 and its delegated and implementing acts.
- (c) Upon receiving the information referred to in points (a) and (b), the competent authority shall take adequate measures to address the safety problem.
- (d) The competent authority shall immediately notify measures taken under point (c) to all persons or organisations which need to comply with them under Regulation (EU) 2018/1139 and its delegated and implementing acts. The competent authority shall also notify those measures to the Agency and, when combined action is required, to the other Member States concerned.

145.B.200 Management system

Regulation (EU) 2021/1963

- (a) The competent authority shall establish and maintain a management system, including as a minimum:
- (1) documented policies and procedures to describe its organisation, the means and methods for establishing compliance with Regulation (EU) 2018/1139 and its delegated and implementing acts. The procedures shall be kept up to date, and serve as the basic working documents within that competent authority for all its related tasks;
 - (2) a sufficient number of personnel to perform its tasks and discharge its responsibilities. A system shall be in place to plan the availability of personnel in order to ensure the proper completion of all tasks;
 - (3) personnel that are qualified to perform their allocated tasks and that have the necessary knowledge and experience and receive initial and recurrent training to ensure continuing competency;
 - (4) adequate facilities and office accommodation for personnel to perform their allocated tasks;
 - (5) a function to monitor the compliance of the management system with the relevant requirements, and the adequacy of the procedures, including the establishment of an internal audit process and a safety risk management process. Compliance monitoring shall include a feedback system of audit findings to the senior management of the competent authority to ensure the implementation of corrective actions as necessary;
 - (6) a person or group of persons having a responsibility to the senior management of the competent authority for the compliance monitoring function.
- (b) The competent authority shall, for each field of activity, including the management system, appoint one or more persons with the overall responsibility for the management of the relevant task(s).
- (c) The competent authority shall establish procedures for the participation in a mutual exchange of all necessary information and assistance with any other competent authorities concerned, whether from the same Member State or from other Member States, including on:
- (1) all findings raised and any follow-up actions taken as a result of the oversight of persons and organisations that carry out activities in the territory of a Member State, but certified by the competent authority of another Member State or by the Agency;
 - (2) information stemming from mandatory and voluntary occurrence reporting as required by [145.A.60](#).
- (d) A copy of the procedures related to the management system and their amendments shall be made available to the Agency for the purpose of standardisation.

AMC1 145.B.200 Management system

ED Decision 2022/011/R

ORGANISATIONAL STRUCTURE

- (a) In deciding upon the required organisational structure, the competent authority should review:
- (1) the number of certificates to be issued, and the number and size of the potential [Part-145](#) approved maintenance organisations within that Member State;

- (2) the possible use of qualified entities and of the resources of the competent authorities of other Member States to fulfil the continuing oversight obligations;
 - (3) the level of civil aviation activity, the number and complexity of the aircraft, and the size of the Member State's aviation industry; and
 - (4) the potential growth of activities in the field of civil aviation.
- (b) The competent authority should retain effective control of the important surveillance functions and should not delegate them in such a way that Part-145 organisations, in effect, regulate themselves in airworthiness matters.
- (c) The set-up of the organisational structure should ensure that the various tasks and obligations of the competent authority do not solely rely on individuals. The continuous and undisturbed fulfilment of these tasks and obligations of the competent authority should also be guaranteed in case of illness, accidents or leave of individual employees.

AMC2 145.B.200 Management system

ED Decision 2022/011/R

GENERAL

- (a) The competent authority designated by each Member State should be organised in such a way that:
- (1) there is specific and effective management authority in the conduct of all the relevant activities;
 - (2) the functions and processes described in the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts, AMC, Certification Specifications (CSs), and Guidance Material (GM) are properly implemented;
 - (3) the competent authority's policy, organisation and operating procedures for the implementation of the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts are properly documented and applied;
 - (4) all the competent authority's personnel who are involved in the related activities are provided with training where necessary;
 - (5) specific and effective provision is made for communicating and interfacing as necessary with EASA and the competent authorities of other Member States; and
 - (6) all the functions related to implementing the applicable requirements are adequately described.
- (b) A general policy in respect of the activities related to the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts should be developed, promoted, and implemented by the manager at the highest appropriate level; for example, the manager at the top of the functional area of the competent authority that is responsible for such activities.
- (c) Appropriate steps should be taken to ensure that the policy is known and understood by all the personnel involved, and all the necessary steps should be taken to implement and maintain the policy.
- (d) The general policy, whilst also satisfying the additional national regulatory responsibilities, should, in particular, take into account:
- (1) the provisions of Regulation (EU) 2018/1139;

- (2) the provisions of the applicable implementing rules and their AMC, CSs, and GM;
 - (3) the needs of industry; and
 - (4) the needs of EASA and of the competent authority.
- (e) The policy should define specific objectives for the key elements of the competent authority organisation and processes for implementing the related activities, including the corresponding control procedures and the measurement of the achieved standard.

AMC1 145.B.200(a)(1) Management system

ED Decision 2022/011/R

DOCUMENTED POLICIES AND PROCEDURES

- (a) The various elements of the organisation involved with the activities related to Regulation (EU) 2018/1139 and its delegated and implementing acts should be documented in order to establish a reference source for the establishment and maintenance of this organisation.
- (b) The documented procedures should be established in a way that facilitates their use. They should be clearly identified, kept up to date, and made readily available to all the personnel who are involved in the related activities.
- (c) The documented procedures should cover, as a minimum, all of the following aspects:
 - (1) policies and objectives;
 - (2) the organisational structure;
 - (3) responsibilities and the associated authority;
 - (4) procedures and processes;
 - (5) internal and external interfaces;
 - (6) internal control procedures;
 - (7) the training of personnel;
 - (8) cross-references to associated documents;
 - (9) assistance from other competent authorities or EASA (where required).
- (d) It is likely that the information may be held in more than one document or series of documents, and suitable cross-referencing should be provided. For example, the organisational structure and job descriptions are not usually in the same documentation as the detailed working procedures. In such cases, it is recommended that the documented procedures should include an index of cross references to all such other related information, and the related documentation should be readily available when required.

GM1 145.B.200(a)(2) Management system

ED Decision 2022/011/R

SUFFICIENT PERSONNEL

- (a) This GM on the determination of the required personnel is limited to the performance of certification and oversight tasks, excluding any personnel who are required to perform tasks that are subject to any national regulatory requirements.

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- (b) The elements to be considered when determining who are the required personnel and planning their availability may be divided into quantitative and qualitative elements:
- (1) Quantitative elements
 - (i) the estimated number of initial certificates to be issued;
 - (ii) the number of organisations to be certified by the competent authority;
 - (iii) the estimated number of subcontracted organisations used by certified organisations.
 - (2) Qualitative elements
 - (i) the size, nature, and complexity of the activities of certified organisations, taking into account:
 - (A) the privileges of each organisation;
 - (B) the types of approval and the scopes of approval;
 - (C) possible certification to industry standards;
 - (D) the number of personnel; and
 - (E) the organisational structure and the existence of subsidiaries;
 - (ii) the safety priorities identified;
 - (iii) the results of past oversight activities, including audits, inspections and reviews, in terms of risks and regulatory compliance, taking into account:
 - (A) the number and the levels of findings;
 - (B) the time frame for implementation of corrective actions; and
 - (C) the maturity of the management systems implemented by organisations, and their ability to effectively manage safety risks; and
 - (iv) the size and complexity of the Member State's aviation industry, and the potential growth of activities in the field of civil aviation, which may be an indication of the number of new applications and changes to existing certificates to be expected.
- (c) Based on the existing data from previous oversight planning cycles, and taking into account the situation within the Member State's aviation industry, the competent authority may estimate:
- (1) the standard working time required for processing applications for new certificates;
 - (2) the number of new certificates to be issued for each planning period; and
 - (3) the number of changes to existing certificates to be processed for each planning period.
- (d) In line with the competent authority's oversight policy, the following planning data should be determined:
- (1) the standard number of audits to be performed per oversight planning cycle;
 - (2) the standard duration of each audit;
 - (3) the standard working time for audit preparation, on-site audit, reporting, and follow-up per inspector;
 - (4) the standard number of unannounced inspections to be performed;

- (5) the standard duration of inspections, including preparation, reporting, and follow-up per inspector; and
 - (6) the minimum number and the required qualifications of the inspectors for each audit/inspection.
- (e) The standard working time could be expressed either in working hours per inspector, or in working days per inspector. All planning calculations should then be based on the same unit (hours or working days).
- (f) It is recommended to use a spreadsheet application to process the data defined under (c) and (d), to assist in determining the total number of working hours/days per oversight planning cycle required for certification, oversight and enforcement activities. This application could also serve as a basis for implementing a system for planning the availability of personnel.
- (g) The number of working hours/days per planning period for each qualified inspector that may be allocated for certification, oversight and enforcement activities should be determined, taking into account:
- (1) purely administrative tasks that are not directly related to certification and oversight;
 - (2) training;
 - (3) participation in other projects;
 - (4) planned absence; and
 - (5) the need to include a reserve for unplanned tasks or unforeseeable events.
- (h) The determination of the working time available for certification, oversight and enforcement activities should also consider, as applicable:
- (1) the use of qualified entities;
 - (2) cooperation with other competent authorities for approvals that involve more than one Member State;
 - (3) oversight activities under a bilateral aviation safety agreement.
- (i) Based on the elements listed above, the competent authority should be able to:
- (1) monitor the dates when audits and inspections are due, and when they were carried out;
 - (2) implement a system to plan the availability of personnel; and
 - (3) identify possible gaps between the number and the qualifications of personnel and the required volume of certification and oversight.

Care should be taken to keep planning data up to date in line with changes in the underlying planning assumptions, with particular focus on risk-based oversight principles.

AMC1 145.B.200(a)(3) Management system

ED Decision 2022/011/R

QUALIFICATION AND TRAINING — GENERAL

- (a) It is essential for the competent authority to have the full capability to adequately assess the compliance and performance of an organisation by ensuring that the whole range of activities is assessed by appropriately qualified personnel.

- (b) For each inspector, the competent authority should:
- (1) define the competencies required to perform the allocated certification and oversight tasks;
 - (2) define the associated minimum qualifications that are required;
 - (3) establish initial and recurrent training programmes in order to maintain and to enhance the competency of inspectors at the level that is necessary to perform the allocated tasks; and
 - (4) ensure that the training provided meets the established standards, and is regularly reviewed and updated whenever necessary.
- (c) The competent authority should ensure that training is provided by qualified trainers with appropriate training skills.

AMC2 145.B.200(a)(3) Management system

ED Decision 2022/011/R

QUALIFICATION AND TRAINING — INSPECTORS

- (a) Competent authority inspectors should have:
- (1) practical experience and expertise in the application of aviation safety standards and safe operating practices;
 - (2) comprehensive knowledge of:
 - (i) the relevant parts of the implementing rules, certification specifications and guidance material;
 - (ii) the competent authority's procedures;
 - (iii) the rights and obligations of an inspector;
 - (iv) safety management systems based on the EU management system requirements and ICAO Annex 19, and compliance monitoring;
 - (v) continuing airworthiness management and maintenance;
 - (vi) operational procedures that affect the continuing airworthiness management of the aircraft or its maintenance;
 - (vii) maintenance-related human factors and human performance principles;
 - (3) training on auditing techniques and assessing and evaluating management systems and safety risk management processes;
 - (4) 5 years of relevant work experience for them to be allowed to work independently as inspectors. This may include experience gained during training to obtain the qualifications mentioned below in point (a)(5);
 - (5) a relevant engineering degree or an aircraft maintenance technician qualification with additional education. 'Relevant engineering degree' refers to an engineering degree from aeronautical, mechanical, electrical, electronic, avionics or other studies that are relevant to the maintenance and continuing airworthiness of aircraft/aircraft components;
 - (6) knowledge of a relevant sample of the type(s) of aircraft or components, gained through a formalised training course. Aircraft/engine type training courses should be at least at a level equivalent to a [Part-66 Appendix III](#) Level 1 General Familiarisation.

‘Relevant sample’ refers to courses that cover the typical aircraft or components that are within the scope of work;

- (7) knowledge of maintenance standards, including fuel tank safety (FTS) training as described in [Appendix IV to AMC5 145.A.30\(e\) and AMC2 145.B.200\(a\)\(3\)](#).
- (b) In addition to technical competency, inspectors should have a high degree of integrity, be impartial in carrying out their tasks, be tactful, and have a good understanding of human nature.
- (c) A programme for recurrent training should be developed that ensures that the inspectors remain competent to perform their allocated tasks. As a general policy, it is not desirable for the inspectors to obtain technical qualifications from those entities that are under their direct regulatory oversight.

AMC3 145.B.200(a)(3) Management system

ED Decision 2022/011/R

INITIAL AND RECURRENT TRAINING — INSPECTORS

- (a) Initial training programme

The initial training programme for inspectors should include, to an extent appropriate to their role, current knowledge, experience and skills, at least all of the following:

- (1) aviation legislation, organisation, and structure;
- (2) the Chicago Convention, the relevant ICAO Annexes and Documents;
- (3) Regulation (EU) No 376/2014 on the reporting, analysis and follow-up of occurrences in civil aviation;
- (4) overview of Regulation (EU) 2018/1139 and its delegated and implementing acts and the related AMC, CS, and GM;
- (5) Regulation (EU) No 1321/2014 as well as any other applicable requirements;
- (6) management systems, including the assessment of the effectiveness of a management system, in particular hazard identification and risk assessment, and non-punitive reporting techniques in the context of the implementation of a ‘just culture’;
- (7) auditing techniques;
- (8) procedures of the competent authority that are relevant to the inspectors’ tasks;
- (9) human factors principles;
- (10) the rights and obligations of inspecting personnel of the competent authority;
- (11) on-the-job training that is relevant to the inspector’s tasks;
- (12) technical training that is appropriate to the role and tasks of the inspector, in particular for those areas that require approvals.

NOTE: The duration of the on-the-job training should take into account the scope and complexity of the inspector’s tasks. The competent authority should assess whether the required competency has been achieved before an inspector is authorised to perform a task without supervision.

- (b) Recurrent training programme
- Once qualified, the inspector should undergo training periodically, as well as whenever deemed necessary by the competent authority, in order to remain competent to perform the allocated tasks. The recurrent training programme for inspectors should include, as appropriate to their role, at least the following topics:
- (1) changes in aviation legislation, the operational environment and technologies;
 - (2) procedures of the competent authority that are relevant to the inspector's tasks;
 - (3) technical training that is appropriate to the role and tasks of the inspector; and
 - (4) results from past oversight.
- (c) Assessments of an inspector's competency should take place at regular intervals that do not exceed 3 years. The results of these assessments, as well as any actions taken following the assessments, should be recorded.

AMC1 145.B.200(a)(5) Management system

ED Decision 2022/011/R

SAFETY RISK MANAGEMENT PROCESS

- (a) The safety risk management process required by point (a)(5) of point [145.B.200](#) should be documented. The following should be defined in the related documentation:
- (1) means for hazard identification, and the related data sources, taking into account data that comes from other competent authorities with which the competent authority interfaces in the State, or from the competent authorities of other Member States;
 - (2) risk management steps including:
 - (i) analysis (in terms of the probability and the severity of the consequences of hazards and occurrences);
 - (ii) assessment (in terms of tolerability); and
 - (iii) control (in terms of mitigation) of risks to an acceptable level;
 - (3) who holds the responsibilities for hazard identification and risk management;
 - (4) who holds the responsibility for the follow-up of risk mitigation actions;
 - (5) the levels of management who have the authority to make decisions regarding the tolerability of risks;
 - (6) means to assess the effectiveness of risk mitigation actions; and
 - (7) the link with the compliance monitoring function.
- (b) To demonstrate that the safety risk management process is operational, competent authorities should be able to provide evidence that:
- (1) the persons involved in internal safety risk management activities are properly trained;
 - (2) hazards that could impact the authority's capabilities to perform its tasks and discharge its responsibilities have been identified and the related risk assessment is documented;
 - (3) regular meetings take place at appropriate levels of management of the competent authority to discuss the risks identified, and to decide on the tolerability of risks and possible risk mitigations;

- (4) in addition to the initial hazard identification exercise, the risk management process is triggered as a minimum whenever changes occur that may affect the competent authority's capability to perform any of the tasks required by [Part-145](#);
- (5) a record of the actions taken to mitigate risks is maintained, showing the status of each action and the owner of the action;
- (6) there is a follow-up on the implementation of all risk mitigation actions;
- (7) risk mitigation actions are assessed for their effectiveness;
- (8) the results of risk assessments are periodically reviewed to check whether they remain relevant. (Are the assumptions still valid? Is there any new information?).

GM1 145.B.200(a)(5) Management system

ED Decision 2022/011/R

SAFETY RISK MANAGEMENT PROCESS

The purpose of safety risk management as part of the management system framework for competent authorities is to ensure the effectiveness of the management system. As for any organisation, hazard identification and risk management are expected to contribute to effective decision-making, to guide the allocation of resources and contribute to organisational success.

The safety risk management process required by point [145.B.200](#) is intended to address the safety risks that are directly related to the competent authority's organisation and processes, and which may affect its capability to perform its tasks and discharge its responsibilities. This process is not intended to be a substitute for the State safety risk management SARPs defined in ICAO Annex 19, Chapter 3, component 3.3. This does not mean, however, that the competent authority may not use information and data that is obtained through its State Safety Programme (SSP), including oversight data and information, for the purposes of safety risk management as part of its management system.

The safety risk management process is also to be applied to the management of changes ([145.B.210](#)), which is intended to ensure that the management system remains effective whenever changes occur.

AMC1 145.B.200(d) Management system

ED Decision 2022/011/R

PROCEDURES AVAILABLE TO EASA

- (a) Copies of the procedures related to the competent authority's management system, and their amendments, that should be made available to EASA for the purpose of standardisation, should provide at least the following information:
 - (1) the competent authority's organisational structure for the continuing oversight functions that it undertakes, with a description of the main processes. This information should demonstrate the allocation of responsibilities within the competent authority, and that the competent authority is capable of carrying out the full range of tasks for the size and complexity of the Member State's aviation industry. It should also consider the overall proficiency and the scope of authorisation of the competent authority's personnel;
 - (2) for personnel who are involved in oversight activities, the minimum required professional qualifications and amount of experience, and the principles that are used to guide their appointment (e.g. assessment);

- (3) how the following are carried out: assessments of applications and evaluations of compliance, the issuing of certificates, continuing oversight activities, the follow-up of findings, enforcement measures and the resolution of safety concerns;
 - (4) the principles used for the management of exemptions and derogations;
 - (5) the processes that are in place to distribute the applicable safety information to enable a timely reaction to a safety problem;
 - (6) the criteria for planning continuing oversight activities (i.e. an oversight programme), including the management of interfaces when conducting continuing oversight activities (of air operations and of continuing airworthiness management, for example);
 - (7) an outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for the recurrent training of oversight personnel.
- (b) As part of the continuous monitoring of a competent authority, EASA may request details of the working methods used, in addition to a copy of the procedures of the competent authority's management system (and any amendments). These additional details are the procedures and the related guidance material that describes the working methods for the personnel of the competent authority who conduct oversight activities.
- (c) Information related to the competent authority's management system may be submitted in an electronic format.

145.B.205 Allocation of tasks to qualified entities

Regulation (EU) 2021/1963

- (a) The competent authority may allocate tasks related to the initial certification or to the continuing oversight of organisations subject to Regulation (EU) 2018/1139 and its delegated and implementing acts, to qualified entities. When allocating tasks, the competent authority shall ensure that it has:
- (1) put a system in place to initially and continuously assess whether the qualified entity complies with Annex VI to Regulation (EU) 2018/1139. That system and the results of the assessments shall be documented;
 - (2) established a written agreement with the qualified entity, approved by both parties at the appropriate management level, which stipulates:
 - (i) the tasks to be performed;
 - (ii) the declarations, reports and records to be provided;
 - (iii) the technical conditions to be met when performing such tasks;
 - (iv) the related liability coverage;
 - (v) the protection given to the information acquired when carrying out such tasks.
- (b) The competent authority shall ensure that the internal audit process and safety risk management process established pursuant to point [145.B.200\(a\)\(5\)](#) cover all the certification and continuing oversight tasks performed by the qualified entity on its behalf.

GM1 145.B.205 Allocation of tasks to qualified entities

ED Decision 2022/011/R

CERTIFICATION TASKS

The tasks that may be performed by a qualified entity on behalf of the competent authority include those that are related to the initial certification and to the continuing oversight of organisations as defined in Regulation (EU) No 1321/2014.

145.B.210 Changes in the management system

Regulation (EU) 2021/1963

- (a) The competent authority shall have a system in place to identify the changes that affect its capability to perform its tasks and discharge its responsibilities as defined in Regulation (EU) 2018/1139 and its delegated and implementing acts. That system shall enable the competent authority to take action necessary to ensure that its management system remains adequate and effective.
- (b) The competent authority shall update in a timely manner its management system to reflect any changes to Regulation (EU) 2018/1139 and its delegated and implementing acts so as to ensure its effective implementation.
- (c) The competent authority shall notify the Agency of any changes affecting its capability to perform its tasks and discharge its responsibilities as provided for in Regulation (EU) 2018/1139 and its delegated and implementing acts.

145.B.220 Record-keeping

Regulation (EU) 2021/1963

- (a) The competent authority shall establish a record-keeping system that allows the adequate storage, accessibility and reliable traceability of:
 - (1) the management system's documented policies and procedures;
 - (2) the training, qualifications and authorisations of its personnel;
 - (3) the allocation of tasks, covering the elements required by point [145.B.205](#), as well as the details of tasks allocated;
 - (4) certification processes and continuing oversight of certified organisations, including:
 - (i) the application for an organisation certificate;
 - (ii) the competent authority's continuing oversight programme, including all the assessments, audits and inspection records;
 - (iii) the organisation certificate, including any changes to it;
 - (iv) a copy of the oversight programme, listing the dates when audits are due and when audits were carried out;
 - (v) copies of all formal correspondence;
 - (vi) recommendations for the issue or continuation of a certificate, details of findings and actions taken by the organisations to close those findings, including the date of closure, enforcement actions and observations;

- (vii) any assessment, audit and inspection report issued by another competent authority pursuant to point [145.B.300\(d\)](#);
 - (viii) copies of all the organisation MOEs or manuals, and of any amendments to them;
 - (ix) copies of any other documents approved by the competent authority;
 - (5) documents supporting the use of alternative means of compliance;
 - (6) safety information provided in accordance with point [145.B.125](#) and follow-up measures;
 - (7) the use of safeguard and flexibility provisions in accordance with Article 70, Article 71(1) and Article 76(4) of Regulation (EU) 2018/1139.
- (b) The competent authority shall maintain a list of all the organisation certificates it has issued.
 - (c) All the records referred to in points (a) and (b) shall be kept for a minimum period of 5 years, subject to applicable data protection law.
 - (d) All the records referred to in points (a) and (b) shall be made available, upon request, to a competent authority of another Member State or to the Agency.

AMC1 145.B.220(a) Record-keeping

ED Decision 2022/011/R

GENERAL

- (a) The record-keeping system should ensure that all records are accessible within a reasonable time whenever they are needed. These records should be organised in a manner that ensures their traceability and retrievability throughout the required retention period.
- (b) All records that contain sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure their confidentiality.
- (c) Records should be kept in paper form, or in an electronic format, or a combination of the two. Records that are stored on microfilm or optical discs are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period starts when the record is created.
- (d) Paper systems should use robust material which can withstand normal handling and filing. Computer record systems should have at least one backup system, which should be updated within 24 hours of any new entry. Computer record systems should include safeguards to prevent any unauthorised personnel from altering the data.
- (e) All computer hardware that is used to ensure the backup of data should be stored in a different location from the one that contains the working data, and in an environment that ensures that the data remains in a good condition. When hardware or software changes take place, special care should be taken to ensure that all the necessary data continues to be accessible throughout at least the full period specified in point [145.B.220\(c\)](#).

AMC1 145.B.220(a)(1) Record-keeping

ED Decision 2022/011/R

COMPETENT AUTHORITY MANAGEMENT SYSTEM

Records that are related to the competent authority's management system should include, as a minimum, and as applicable:

- (a) the documented policies and procedures;

- (b) the personnel files of the competent authority's personnel, with the supporting documents related to their training and qualifications;
- (c) the results of the competent authority's internal audits and safety risk management processes, including audit findings, and corrective, preventive and risk mitigation actions; and
- (d) the contract(s) established with any qualified entities that perform certification or oversight tasks on behalf of the competent authority.

145.B.300 Oversight principles

Regulation (EU) 2021/1963

- (a) The competent authority shall verify:
 - (1) compliance with the requirements that are applicable to organisations, prior to issuing an organisation certificate;
 - (2) continued compliance with the applicable requirements of the organisations it has certified;
 - (3) the implementation of appropriate safety measures mandated by the competent authority in accordance with points [145.B.135\(c\)](#) and [\(d\)](#).
- (b) This verification shall:
 - (1) be supported by documentation specifically intended to provide personnel responsible for oversight with guidance to perform their functions;
 - (2) provide the organisations concerned with the results of oversight activities;
 - (3) be based on assessments, audits and inspections and, if needed, unannounced inspections;
 - (4) provide the competent authority with the evidence needed in case further action is required, including the measures provided for in point [145.B.350](#).
- (c) The competent authority shall establish the scope of the oversight set out in points (a) and (b) taking into account the results of past oversight activities and the safety priorities.
- (d) If the facilities of an organisation are located in more than one State, the competent authority, as defined in point [145.1](#), may agree to have the oversight tasks performed by the competent authority(ies) of the Member State(s) where the facilities are located, or by the Agency for facilities that are located outside a territory for which Member States are responsible under the Chicago Convention. Any organisation that is subject to such an agreement shall be informed of its existence and of its scope.
- (e) For any oversight activities that are performed at facilities located in a Member State other than where the organisation has its principal place of business, the competent authority, as defined in point [145.1](#), shall inform the competent authority of that Member State before performing any on-site audit or inspection of the facilities.
- (f) The competent authority shall collect and process any information deemed necessary for performing oversight activities.

AMC1 145.B.300(a);(b);(c) Oversight principles

ED Decision 2022/011/R

MANAGEMENT SYSTEM ASSESSMENT

As part of the initial certification of an organisation, the competent authority should assess the organisation's management system and processes to make sure that all the required enablers of a functioning management system are present and suitable.

As part of its continuing oversight activities, the competent authority should verify that the required enablers remain present and operational, and assess the effectiveness of the organisation's management system and processes.

When significant changes take place in the organisation, the competent authority should determine whether there is a need to review the existing assessment to ensure that it is still valid.

AMC1 145.B.300(f) Oversight principles

ED Decision 2022/011/R

INFORMATION DEEMED NECESSARY FOR OVERSIGHT

This information should include, as a minimum:

- (a) any occurrence reports received by the competent authority;
- (b) the reports received following the issuing of any one-off certification authorisations as defined in point [145.A.30\(j\)\(5\)](#);
- (c) the results of the following types of inspections and surveys if they indicate an issue that originates from a [Part-145](#) organisation:
 - (i) ramp inspections performed in accordance with Subpart RAMP of Annex II (Part-ARO) to Commission Regulation (EU) No 965/2012 on air operations;
 - (ii) product surveys of aircraft, pursuant to point [M.B.303](#) or point [ML.B.303](#);
 - (iii) product audits conducted pursuant to point [CAMO.B.305\(b\)\(1\)](#) or point [145.B.305\(b\)\(1\)](#); and
 - (iv) physical surveys or partial airworthiness reviews performed by the competent authority in line with [AMC M.B.901](#).

145.B.305 Oversight programme

Regulation (EU) 2021/1963

- (a) The competent authority shall establish and maintain an oversight programme covering the oversight activities required by point [145.B.300](#).
- (b) The oversight programme shall take into account the specific nature of the organisation, the complexity of its activities, the results of past certification or oversight activities, or both, and it shall be based on the assessment of the associated risks. It shall include, within each oversight planning cycle:
 - (1) assessments, audits and inspections, including, as appropriate:
 - (i) management system assessments and process audits;
 - (ii) product audits of a relevant sample of the maintenance carried out by the organisation;

- (iii) sampling of the airworthiness reviews performed;
 - (iv) unannounced inspections;
- (2) meetings convened between the accountable manager and the competent authority to ensure that both parties remain informed of all significant issues.
- (c) The oversight planning cycle shall not exceed 24 months.
- (d) Notwithstanding point (c), the oversight planning cycle may be extended to 36 months if the competent authority has established that during the previous 24 months:
 - (1) the organisation has demonstrated that it can effectively identify aviation safety hazards and manage the associated risks;
 - (2) the organisation has continuously demonstrated compliance with point [145.A.85](#) and it has full control over all changes;
 - (3) no level 1 findings have been issued;
 - (4) all corrective actions have been implemented within the time period that was accepted or extended by the competent authority as provided for in point [145.B.350](#).

Notwithstanding point (c), the oversight planning cycle may be further extended to a maximum of 48 months if, in addition to the conditions provided in points (d)(1) to (4), the organisation has established, and the competent authority has approved, an effective continuous system for reporting to the competent authority on the safety performance and regulatory compliance of the organisation itself.

- (e) The oversight planning cycle may be shortened if there is evidence that the safety performance of the organisation has decreased.
- (f) The oversight programme shall include records of the dates when assessments, audits, inspections and meetings are due, and when assessments, audits, inspections and meetings have been effectively carried out.
- (g) At the completion of each oversight planning cycle, the competent authority shall issue a recommendation report on the continuation of the approval, reflecting the results of the oversight.

AMC1 145.B.305(a);(b) Oversight programme

ED Decision 2022/011/R

ANNUAL REVIEW

- (a) The oversight planning cycle and the related oversight programme for each organisation should be reviewed annually to ensure that they remain adequate regarding any changes in the nature of the organisation, the complexity of its activities or the safety performance of the organisation.
- (b) When reviewing the oversight planning cycle and the related oversight programme, the competent authority should also consider any relevant information collected in accordance with points [145.A.60](#) and [145.B.300\(f\)](#).

AMC1 145.B.305(b) Oversight programme

ED Decision 2022/011/R

SPECIFIC NATURE OF THE ORGANISATION AND COMPLEXITY OF ITS ACTIVITIES — RESULTS OF PAST CERTIFICATION OR OVERSIGHT ACTIVITIES

When determining the oversight programme, including the product audits, the competent authority should consider in particular the following elements, as applicable:

- (1) the effectiveness of the organisation's management system in identifying and addressing non-compliances and safety hazards;
- (2) the implementation by the organisation of any industry standards that are directly relevant to the organisation's activities subject to this Regulation;
- (3) the procedure applied for and the scope of changes not requiring prior approval;
- (4) any specific procedures implemented by the organisation that are related to any alternative means of compliance used;
- (5) the number of approved locations and the activities performed at each location;
- (6) the number and type of any subcontractors that perform maintenance tasks; and
- (7) the volume of activity for each A, B, C and D class rating, as applicable.

AMC2 145.B.305(b) Oversight programme

ED Decision 2022/011/R

SUBCONTRACTED ACTIVITIES

If a [Part-145](#) organisation subcontracts maintenance tasks, the competent authority should determine whether the subcontracted organisation needs to be audited and included in the oversight programme, taking into account the specific nature and complexity of the subcontracted activities, the results of previous oversight activities of the approved organisation, and the assessment of the associated risks.

For such audits, competent authority inspectors should ensure that they are accompanied throughout the audit by a senior technical member of the Part-145 organisation.

NOTE: If a Part-145 organisation subcontracts maintenance tasks, the competent authority should ensure that the Part-145 organisation manages the risks related to, and that it has sufficient control over, the subcontracted activities (see [AMC1 145.A.75\(b\)](#)).

AMC1 145.B.305(b)(1) Oversight programme

ED Decision 2022/011/R

AUDIT

- (a) The oversight programme should indicate which aspects of the approval will be covered by each audit.
- (b) Part of each audit should concentrate on the audit reports produced by the organisation's compliance monitoring function, to determine whether the organisation has been identifying and correcting its problems.
- (c) At the conclusion of the audit, the auditing inspector should complete an audit report that identifies the areas and processes that were audited, and includes all the findings that were raised.

- (d) At the completion of each oversight planning cycle, a new EASA Form 6 should be issued.

AMC1 145.B.305(c) Oversight programme

ED Decision 2022/011/R

OVERSIGHT PLANNING CYCLE — AUDIT AND INSPECTION

- (a) When determining the oversight planning cycle and defining the oversight programme, the competent authority should assess the risks related to the activity and set-up of each organisation, and adapt the oversight to the level of risk identified and to the effectiveness of the organisation's management system, in particular its ability to effectively manage safety risks.
- (b) The competent authority should establish a schedule of audits and inspections that is appropriate to each organisation. The planning of audits and inspections should take into account the results of the hazard identification and the risk assessment conducted and maintained by the organisation as part of the organisation's management system. Inspectors should work in accordance with the schedule provided to them.
- (c) When the competent authority, having regard to the level of risk identified and the effectiveness of the organisation's management system, varies the frequency of an audit or inspection, it should ensure that all aspects of the organisation's activity are audited and inspected within the applicable oversight planning cycle.

AMC2 145.B.305(c) Oversight programme

ED Decision 2022/011/R

OVERSIGHT PLANNING CYCLE — AUDIT

- (a) For each organisation certified by the competent authority, all applicable requirements including relevant processes should be audited at periods that do not exceed the applicable oversight planning cycle. The beginning of the first oversight planning cycle is normally determined by the date of issue of the first certificate. If the competent authority wishes to align the oversight planning cycle with the calendar year, it should shorten the first oversight planning cycle accordingly.
- (b) Audits should include at least one on-site audit within each oversight planning cycle. For organisations that carry out their regular activities at more than one site, the determination of the sites and the requirements at these sites to be audited should consider the results of past oversight activities and the volume of activities at each site, as well as the main risk areas identified.
- (c) For organisations that hold more than one certificate under Regulation (EU) 2018/1139, the competent authority may define an integrated oversight schedule that includes all the applicable audit items. In order to avoid any duplication of audits, credit may be granted for specific audit items that have already been completed during the current oversight planning cycle, provided that:
- (1) the specific audit item is the same for all the certificates under consideration;
 - (2) there is satisfactory evidence on record that those specific audit items were carried out, and that all the related corrective actions have been implemented to the satisfaction of the competent authority;

- (3) the competent authority is satisfied that there is no evidence that standards have deteriorated regarding those specific audit items for which credit is granted.

GM1 145.B.305(c) Oversight programme

ED Decision 2022/011/R

The expression 'shall not exceed 24 months' does not imply that 24 months is a minimum duration for the oversight cycle. Based on the elements specified in [145.B.300\(c\)](#) and [145.B.305\(b\)](#) (e.g. safety priorities, assessment of the risks, complexity of activities), the competent authority may decide to apply a cycle of less than 24 months (e.g. 12 months).

AMC1 145.B.305(d) Oversight programme

ED Decision 2022/011/R

EXTENSION OF THE OVERSIGHT PLANNING CYCLE BEYOND 24 MONTHS

- (a) If the competent authority applies an oversight planning cycle that exceeds 24 months, it should, at a minimum, perform one focused inspection of the organisation (inspection of a specific area, element or aspect of the organisation) within each 12-month segment of the applicable oversight planning cycle to support the extended oversight programme.
- (b) If the results of this inspection indicate a decrease in the safety performance or regulatory compliance of the organisation, the competent authority should revert back to a 24-month (or less) oversight planning cycle and review the oversight programme accordingly.
- (c) In order to be able to apply an oversight planning cycle beyond 36 months, the competent authority should agree on the format and contents of the continuous reporting to be made by the organisation on its safety performance and regulatory compliance.

GM1 145.B.305(d)(2) Oversight programme

ED Decision 2022/011/R

ORGANISATION'S CONTROL OVER THE CHANGES

For the purpose of extending the oversight planning beyond 24 months, the continuous compliance of the organisation with [145.A.85](#) and the full control over all changes referred to in point [145.B.305\(d\)\(2\)](#) includes in particular the ability of the organisation to manage adequately the changes not requiring prior approval foreseen in [145.A.85\(c\)](#).

145.B.310 Initial certification procedure

Regulation (EU) 2021/1963

- (a) Upon receiving an application from an organisation for the initial issue of a certificate, the competent authority shall verify the organisation's compliance with the applicable requirements.
- (b) A meeting with the accountable manager of the organisation shall be convened at least once during the investigation for initial certification to ensure that that person understands his or her role and accountability.
- (c) The competent authority shall record all the findings issued, closure actions as well as the recommendations for the issue of the certificate.

- (d) The competent authority shall confirm to the organisation in writing all the findings raised during the verification. For initial certification, all findings must be corrected to the satisfaction of the competent authority before the certificate can be issued.
- (e) When satisfied that the organisation complies with the applicable requirements, the competent authority shall:
 - (1) issue the certificate as established in [Appendix III](#) “EASA Form 3-145” in accordance with the class and rating system provided for in [Appendix II](#);
 - (2) formally approve the MOE.
- (f) The certificate reference number shall be included on the EASA Form 3-145 certificate in a manner specified by the Agency.
- (g) The certificate shall be issued for an unlimited duration. The privileges and the scope of the activities that the organisation is approved to conduct, including any limitations as applicable, shall be specified in the terms of approval attached to the certificate.
- (h) To enable the organisation to implement changes without prior competent authority approval in accordance with point [145.A.85\(c\)](#), the competent authority shall approve the relevant MOE procedure that sets out the scope of such changes and describes how such changes will be managed and notified to the competent authority.

AMC1 145.B.310 Initial certification procedure

ED Decision 2022/011/R

VERIFICATION OF COMPLIANCE

- (a) In order to verify the organisation’s compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, including interviews of the personnel, and inspections carried out at the organisation’s facilities.
- (b) The competent authority should only conduct such an audit if it is satisfied that the application and the supporting documentation, including the results of the pre-audit performed by the organisation, are in compliance with the applicable requirements.
- (c) The audit should focus on the following areas:
 - (1) the detailed management structure, including the names and qualifications of personnel as required by points [\(a\)](#), [\(b\)](#), [\(c\)](#) and [\(ca\)](#) of point 145.A.30, and the adequacy of the organisation and its management structure;
 - (2) the personnel:
 - (i) the adequacy of the number of staff, and of their qualifications and experience with regard to the intended terms of approval and the associated privileges;
 - (ii) the validity of any licences and/or authorisations, as applicable;
 - (3) the processes used for safety risk management and compliance monitoring;
 - (4) the facilities and their adequacy regarding the organisation’s scope of work;
 - (5) the documentation based on which the certificate should be granted (i.e. the documentation required by [Part-145](#)):
 - (i) verification that the procedures specified in the MOE comply with the applicable requirements; and

- (ii) verification that the accountable manager has signed the exposition statement.
- (d) If an application for an organisation certificate is refused, the applicant should be informed of the right of appeal that exists under national law.

AMC1 145.B.310(a) Initial certification procedure

ED Decision 2022/011/R

AUDIT

- (a) The competent authority should determine how and by whom the audit shall be conducted. For example, it will be necessary to determine whether one large team audit, a short series of small team audits, or a long series of single inspector audits is most appropriate for the particular situation.
- (b) The audit may be structured so as to verify the organisation's processes related to a product line. For example, in the case of an organisation with Airbus A310 and A320 ratings, the audit should concentrate on the maintenance processes of one aircraft type only for a full compliance check, and depending upon the result, the second aircraft type may only require a sample check against those aspects that were seen to be weak regarding compliance for the first type.
- (c) In determining the scope of the audit and which activities of the organisation will be assessed during the audit, the privileges of the approved organisation should be taken into account, e.g. their approval to carry out airworthiness reviews.
- (d) Competent authority auditing inspectors should always ensure that they are accompanied throughout the audit by a senior member of the organisation, who is normally the compliance monitoring manager. The reason for being accompanied is to ensure that the organisation is fully aware of any findings raised during the audit.
- (e) At the end of the audit, the auditing inspector should inform the senior member of the organisation of all the findings that were raised during the audit.

AMC1 145.B.310(c) Initial certification procedure

ED Decision 2022/011/R

There may be occasions when the competent authority inspector is unsure about the compliance of some aspects of the organisation applying for the initial issue of a certificate. If this occurs, the inspector should inform the organisation about the possible non-compliance at the time, and about the fact that the situation will be reviewed within the competent authority before a decision is made. If the review concludes that there is no finding, then a verbal confirmation to the organisation should suffice.

AMC2 145.B.310(c) Initial certification procedure

ED Decision 2022/011/R

- (a) The audit should be recorded using the audit report EASA Form 6 ([Appendix II to AMC2 145.B.310\(c\)](#)).
- (b) A review of the EASA Form 6 audit report form should be carried out by a competent independent person nominated by the competent authority. A satisfactory review of the audit report should be indicated by a signature on the EASA Form 6.
- (c) The audit reports should include the date when each finding was closed, together with a reference to the closure actions.

AMC1 145.B.310(d) Initial certification procedure

ED Decision 2022/011/R

All findings should be confirmed in writing to the applicant organisation within 2 weeks of the on-site audit.

145.B.330 Changes – organisations

Regulation (EU) 2021/1963

- (a) Upon receiving an application for a change that requires prior approval, the competent authority shall verify the organisation's compliance with the applicable requirements before issuing the approval.
- (b) The competent authority shall establish the conditions under which the organisation may operate during the change unless the competent authority determines that the organisation's certificate needs to be suspended.
- (c) When it is satisfied that the organisation complies with the applicable requirements, the competent authority shall approve the change.
- (d) Without prejudice to any additional enforcement measures, if the organisation implements changes requiring prior approval without having received the approval of the competent authority pursuant to point (c), the competent authority shall consider the need to suspend, limit or revoke the organisation's certificate.
- (e) For changes not requiring prior approval, the competent authority shall include the review of such changes in its continuing oversight in accordance with the principles set forth in point [145.B.300](#). If any non-compliance is found, the competent authority shall notify the organisation, request further changes, and act in accordance with point [145.B.350](#).

AMC1 145.B.330 Changes — organisations

ED Decision 2022/011/R

- (a) The competent authority should have adequate control over any changes to the personnel specified in points [\(a\)](#), [\(b\)](#), [\(c\)](#), [\(ca\)](#) and [\(k\)](#) of point 145.A.30. Such changes in personnel will require an amendment to the exposition.
- (b) When an organisation submits the name of a new nominee for any of the personnel specified in points [\(a\)](#), [\(b\)](#), [\(c\)](#), [\(ca\)](#) and [\(k\)](#) of point 145.A.30, the competent authority may require the organisation to produce a written résumé of the proposed person's qualifications. The competent authority should reserve the right to interview the nominee or to call for additional evidence of their suitability before deciding upon them being acceptable.
- (c) For changes requiring prior approval, in order to verify the organisation's compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, limited to the extent of the changes. The competent authority may also request the organisation to provide the risk assessment referred to in [AMC2 145.A.85](#) for review.
- (d) If required, the audit may include interviews and inspections carried out at the organisation's facilities.
- (e) The applicable part(s) of EASA Form 6 should be used to document the assessment of any changes to the [Part-145](#) approval.

GM1 145.B.330 Changes — organisations

ED Decision 2022/011/R

CHANGE OF THE NAME OF THE ORGANISATION

- (a) On receipt of the application and the amendment to the relevant parts of the MOE, the competent authority should reissue the certificate.
- (b) A change of only the name does not require the competent authority to audit the organisation unless there is evidence that other aspects of the organisation have changed.

AMC1 145.B.330(e) Changes — organisations

ED Decision 2022/011/R

REVIEW OF CHANGES NOT REQUIRING PRIOR APPROVAL

The authority should implement a process to review the changes not requiring prior approval. This should include at least, as part of the continuing oversight activities during the oversight cycle:

- auditing the organisation process for changes not requiring prior approval;
- selecting a sample of these changes and verifying their compliance with the applicable requirements.

145.B.350 Findings and corrective actions; observations

Regulation (EU) 2021/1963

- (a) The competent authority shall have a system in place to analyse findings for their safety significance.
- (b) A level 1 finding shall be issued by the competent authority when any significant non-compliance is detected with the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts, with the organisation's procedures and manuals, or with the organisation's certificate including the terms of approval, which lowers safety or seriously endangers flight safety.

Level 1 findings shall also include:

- (1) any failure to grant the competent authority access to the organisation's facilities referred to in point [145.A.140](#) during normal operating hours and after two written requests;
 - (2) obtaining the organisation certificate or maintaining its validity by falsification of the submitted documentary evidence;
 - (3) any evidence of malpractice or fraudulent use of the organisation certificate;
 - (4) the lack of an accountable manager.
- (c) A level 2 finding shall be issued by the competent authority when any non-compliance is detected with the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts, with the organisation's procedures and manuals, or with the organisation's certificate including the terms of approval, which is not classified as a level 1 finding.
 - (d) When a finding is detected during oversight or by any other means, the competent authority shall, without prejudice to any additional action required by Regulation (EU) 2018/1139 and its delegated and implementing acts, communicate in writing the finding to the organisation and request corrective action to address the non-compliance identified. If a level 1 finding directly

relates to an aircraft, the competent authority shall inform the competent authority of the Member State in which the aircraft is registered.

- (1) If there are any level 1 findings, the competent authority shall take immediate and appropriate action to prohibit or limit the activities of the organisation involved and, if appropriate, it shall take action to revoke the certificate or to limit or suspend it in whole or in part, depending on the extent of the level 1 finding, until successful corrective action has been taken by the organisation.
 - (2) If there are any level 2 findings, the competent authority shall:
 - (i) grant the organisation a corrective action implementation period that is appropriate to the nature of the finding, and that in any case shall initially not be more than 3 months. The period shall commence from the date of the written communication of the finding to the organisation requesting corrective action to address the non-compliance identified. At the end of that period, and subject to the nature of the finding, the competent authority may extend the 3-month period provided that a corrective action plan has been agreed with the competent authority;
 - (ii) assess the corrective action plan and implementation plan proposed by the organisation, and if the assessment concludes that they are sufficient to address the non-compliance, accept them.
 - (3) If the organisation fails to submit an acceptable corrective action plan, or fails to perform the corrective action within the time period accepted or extended by the competent authority, the finding shall be raised to level 1 and action shall be taken as laid down in point (d)(1).
 - (4) The competent authority shall record all the findings that it has raised or that have been communicated to it in accordance with point (e) and, where applicable, the enforcement measures it has applied, as well as all corrective actions and the dates of the action closures for all the findings.
- (e) Without prejudice to any additional enforcement measures, when an authority performing the oversight tasks pursuant to point [145.B.300\(d\)](#) identifies any non-compliance with the applicable requirements of Regulation (EU) 2018/1139 and its delegated and implementing acts by an organisation certified by the competent authority of another Member State or the Agency, it shall inform that competent authority and provide an indication of the level of the finding.
- (f) The competent authority may issue observations for any of the following cases not requiring level 1 or level 2 findings:
- (1) for any item whose performance has been assessed to be ineffective;
 - (2) when it has been identified that an item has the potential to cause a non-compliance under points (b) or (c);
 - (3) when suggestions or improvements are of interest for the overall safety performance of the organisation.

The observations issued under this point shall be communicated in writing to the organisation and recorded by the competent authority.

GM1 145.B.350(f) Findings and corrective actions; observations

ED Decision 2022/011/R

DIFFERENCE BETWEEN 'LEVEL 2 FINDING' AND 'OBSERVATION'

- (a) 'Findings' are issued for non-compliance with the Regulation, whereas 'observations' may be issued to an organisation remaining compliant with the Regulation while additional inputs for the organisation could be considered for continuous improvement.

However, the competent authority may decide to issue a 'level 2' finding when the 'observations' process is not managed correctly or overlooked.

- (b) Examples to help differentiate between a 'level 2 finding' and an 'observation' are provided below, based on the provisions for the control and calibration of tools in accordance with point [145.A.40\(b\)](#).

Example of a 'level 2 finding'

- The organisation could not demonstrate compliance with some elements of [145.A.40\(b\)](#) regarding the control register of the tools, equipment and particularly test equipment process as evidenced by:
 - (1) the fact that some sampled tools physically available in the tools store were missing in the tools control register managed by the organisation;
 - (2) the fact that one tool has not been correctly identified (e.g. incorrect P/N, S/N) in the tools control register.

Examples of 'observations'

- Accumulation of tools in the store not sent yet for calibration. This situation could generate some consequences on the availability of tools and operational capabilities during a peak of activities (ineffectiveness of the process).
- The process to manage the tools control register through the dedicated software is not detailed enough (potential to cause a level 2 finding).
- The colour of the 'unserviceable' tag of the tools could generate some confusion. The organisation should consider changing the colour of this unserviceable tag to better alert the staff on the particular status of the unserviceable tools (potential improvement).

145.B.355 Suspension, limitation and revocation

Regulation (EU) 2021/1963

The competent authority shall:

- (a) suspend a certificate when it considers that there are reasonable grounds that such action is necessary to prevent a credible threat to aircraft safety;
- (b) suspend, revoke or limit a certificate if such action is required pursuant to point [145.B.350](#);
- (c) suspend or limit in whole or in part a certificate if unforeseeable circumstances outside the control of the competent authority prevent its inspectors from discharging their oversight responsibilities over the oversight planning cycle.

APPENDICES TO ANNEX II (PART-145)

Appendix I — Authorised Release Certificate — EASA Form 1

Regulation (EU) No 1321/2014

The provisions of [Appendix II to Annex I \(Part-M\)](#) apply.

Appendix II — Class and rating system for the terms of approval of Part-145 maintenance organisations

Regulation (EU) 2021/1963

- (a) Except as stated otherwise for the smallest organisations referred to in point (m), the table referred to in point (l) provides the possible classes and ratings to be used to establish the terms of approval of the certificate of the organisation approved in accordance with [Annex II \(Part-145\)](#). An organisation must be granted terms of approval that range from a single class and rating with limitations to all classes and ratings with limitations.
- (b) In addition to the table in point (l), each maintenance organisation is required to indicate its scope of work in its MOE.
- (c) Within the approval class(es) and rating(s) established by the competent authority, the scope of work specified in the MOE defines the exact limits of its approval. It is therefore essential that the approval class(es) and rating(s) and the organisation's scope of work match.
- (d) A *category A class rating* means that the maintenance organisation may carry out maintenance on aircraft and components (including engines and/or auxiliary power units (APUs)), in accordance with the aircraft maintenance data or, if agreed by the competent authority, in accordance with the component maintenance data, only while such components are fitted to the aircraft. Nevertheless, such an A-rated maintenance organisation may temporarily remove a component for maintenance in order to improve access to that component, except when its removal generates the need for additional maintenance that the organisation is not approved to perform. Such removal of component for maintenance by A-rated maintenance organisation shall be subject to an appropriate control procedure in the MOE.
- The limitation column must specify the scope of such maintenance, thereby indicating the extent of the approval.
- (e) *Category A class ratings* are subdivided into "Base" or "Line" maintenance categories. Such an organisation may be approved for either "Base" or "Line" maintenance, or both. It should be noted that a "Line" facility located at a main base facility requires a "Line" maintenance approval.
- (f) A *category B class rating* means that the maintenance organisation may carry out maintenance on uninstalled engines and/or APUs and engine and/or APU components, in accordance with the engine and/or APU maintenance data or, if agreed by the competent authority, in accordance with the component maintenance data, only while such components are fitted to the engine and/or the APU. Nevertheless, such a B-rated approved maintenance organisation may temporarily remove a component for maintenance in order to improve access to that component, except when its removal generates the need for additional maintenance that the organisation is not approved to perform.

The limitation column must specify the scope of such maintenance, thereby indicating the extent of the approval.

A maintenance organisation that is approved with a category B class rating may also carry out maintenance on an installed engine during aircraft base and line maintenance, provided that an appropriate control procedure in the MOE has been approved by the competent authority. The scope of work in the MOE shall reflect those activities if they are permitted by the competent authority.

- (g) A *category C class rating* means that the maintenance organisation may carry out maintenance on uninstalled components (excluding complete engines and APUs) that are intended to be fitted on the aircraft or the engine/APU.

The limitation column must specify the scope of such maintenance, thereby indicating the extent of the approval.

A maintenance organisation that is approved with a category C class rating may also carry out maintenance on an installed component (other than a complete engine/APU) during aircraft base and line maintenance, or at an engine/APU maintenance facility provided that an appropriate control procedure in the MOE has been approved by the competent authority. The scope of work in the MOE shall reflect those activities if they are permitted by the competent authority.

- (h) A *category D class rating* is a self-contained class rating that is not necessarily related to a specific aircraft, engine or other component. The D1 – Non-Destructive Testing (NDT) rating is only necessary for a maintenance organisation that carries out NDT as a particular task for another organisation. A maintenance organisation that is approved with a class rating in the A, B or C category may carry out NDT on products that it maintains without the need for a D1 class rating provided that the MOE contains appropriate NDT procedures.
- (i) The *limitation* column is intended to give competent authorities the flexibility to customise an approval for any particular organisation. Ratings may only be mentioned on the approval if they are appropriately limited. The table in point (l) specifies the types of limitations that are possible. It is acceptable to stress in the limitation column the maintenance task rather than the type or manufacturer of the aircraft or engine, if that is more appropriate to the organisation (an example could be avionics systems installations and the related maintenance). If that is mentioned in the limitation column, it indicates that the maintenance organisation is approved to carry out maintenance up to and including that particular type/task.
- (j) When reference is made to the *series*, *type* and *group* in the limitation column of class A and B, it shall be understood as follows:
- “series” means a specific type series such as the Airbus 300, 310 or 319, or the Boeing 737-300 series, the RB211-524 series, the Cessna 150 or Cessna 172, the Beech 55 series, the continental O-200 series, etc.,
 - “type” means a specific type or model such as the Airbus 310-240 type, the RB 211-524 B4 type, or the Cessna 172RG type.
Any number of series or types may be quoted,
 - “group” means, for example, Cessna single piston engine aircraft or Lycoming non-supercharged piston engines, etc.
- (k) By way of derogation from point [145.A.85\(a\)\(1\)](#), when a component capability list is used that could be subject to frequent amendments, then the organisation may propose to include such amendments in the procedure referred to in point [145.A.85\(c\)](#) for changes not requiring prior approval.

(I) Table

CLASS	RATING	LIMITATION	BASE	LINE
AIRCRAFT	A1 Aeroplanes above 5 700 kg maximum take-off mass (MTOM)	[Shall state the aeroplane manufacturer or the group or series or type and/or the maintenance tasks] <i>Example: Airbus A320 Series</i>	[YES/NO] (*1)	[YES/NO] (*1)
	A2 Aeroplanes of 5 700 kg MTOM and below	[Shall state the aeroplane manufacturer or the group or series or type and/or the maintenance tasks] <i>Example: DHC-6 Twin Otter Series</i> State whether the issuing of airworthiness review certificates is authorised (only possible for aircraft covered by Annex Vb (Part-ML))	[YES/NO] (*1)	[YES/NO] (*1)
	A3 Helicopters	[Shall state the helicopter manufacturer or the group or series or type and/or the maintenance task(s)] <i>Example: Robinson R44</i> State whether the issuing of airworthiness review certificates is authorised (only possible for aircraft covered by Annex Vb (Part-ML))	[YES/NO] (*1)	[YES/NO] (*1)
	A4 Aircraft other than A1, A2 and A3 aircraft	[Shall state the aircraft category (sailplane, balloon, airship, etc.), the manufacturer or group or series or type and/or the maintenance task(s)] State whether the issuing of airworthiness review certificates is authorised (only possible for aircraft covered by Annex Vb (Part-ML))	[YES/NO] (*1)	[YES/NO] (*1)
ENGINES	B1 Turbine	[Shall state engine series or type and/or the maintenance task(s)] <i>Example: PT6A Series</i>		
	B2 Piston	[Shall state engine manufacturer or group or series or type and/or the maintenance task(s)]		
	B3 APU	[Shall state engine manufacturer or series or type and/or the maintenance task(s)]		

CLASS	RATING	LIMITATION	BASE	LINE
COMPONENTS OTHER THAN COMPLETE ENGINES OR APUs	C1 Air Cond & Press	[Shall state the aircraft type or aircraft manufacturer or component manufacturer or the particular component and/or cross-refer to a capability list in the exposition and/or the maintenance task(s)] <i>Example: PT6A Fuel Control</i>		
	C2 Auto Flight			
	C3 Comms and Nav			
	C4 Doors — Hatches			
	C5 Electrical Power & Lights			
	C6 Equipment			
	C7 Engine — APU			
	C8 Flight Controls			
	C9 Fuel			
	C10 Helicopter — Rotors			
	C11 Helicopter — Trans			
	C12 Hydraulic Power			
	C13 Indicating — recording system			
	C14 Landing Gear			
	C15 Oxygen			
	C16 Propellers			
	C17 Pneumatic & Vacuum			
	C18 Protection ice/rain/fire			
	C19 Windows			
	C20 Structural			
	C21 Water ballast			
	C22 Propulsion Augmentation			
SPECIALISED SERVICES	D1 Non - Destructive Testing	[Shall state particular NDT method(s)]		
(*1) Delete as appropriate				

- (m) A maintenance organisation which employs only one person to both plan and carry out all its maintenance activities can only hold limited terms of approval. The maximum permissible limits are as follows:

CLASS	RATING	LIMITATION
AIRCRAFT	A2	PISTON ENGINE AEROPLANE OF 5 700 KG MTOM OR LESS
AIRCRAFT	A3	SINGLE PISTON ENGINE HELICOPTER OF 3 175 KG MTOM OR LESS
AIRCRAFT	A4	NO LIMITATIONS
ENGINES	B2	LESS THAN 450 HP
COMPONENTS OTHER THAN COMPLETE ENGINES OR APUs.	C1 TO C22	AS PER CAPABILITY LIST
SPECIALISED SERVICES	D1 NDT	NDT METHOD(S) TO BE SPECIFIED.

It should be noted that such an organisation may be further limited by the competent authority in the terms of approval depending on the capabilities of the particular organisation.

**Appendix III — Maintenance Organisation Certificate — EASA
Form 3-145**

Regulation (EU) 2020/270

Page 1 of 2

[MEMBER STATE (*)]
A Member of the European Union ()**

MAINTENANCE ORGANISATION CERTIFICATE
Reference: [MEMBER STATE CODE(*)].145.XXXX

Pursuant to Regulation (EU) 2018/1139 of the European Parliament and of the Council and to Commission Regulation (EU) No 1321/2014 and subject to the conditions specified below, the [COMPETENT AUTHORITY OF THE MEMBER STATE (*)] hereby certifies:

[COMPANY NAME AND ADDRESS]

as a maintenance organisation in compliance with Section A of Annex II (Part-145) to Regulation (EU) No 1321/2014, approved to maintain products, parts and appliances listed in the attached terms of approval and issue related certificates of release to service using the above references and, when stipulated, to issue airworthiness review certificates after an airworthiness review as specified in point [MLA.903](#) of Annex Vb (Part-ML) to that Regulation for those aircraft listed in the attached terms of approval

CONDITIONS:

1. This approval is limited to that specified in the scope of work section of the approved maintenance organisation exposition as referred to in [Section A of Annex II \(Part-145\)](#), and
2. This approval requires compliance with the procedures specified in the approved maintenance organisation exposition, and
3. This approval is valid whilst the approved maintenance organisation remains in compliance with Annex II ([Part-145](#)) of Regulation (EU) No 1321/2014.
4. Subject to compliance with the foregoing conditions, this approval shall remain valid for an unlimited duration unless the approval has previously been surrendered, superseded, suspended or revoked.

Date of original issue:

Date of this revision:

Revision No:

Signed:

For the competent authority: [COMPETENT AUTHORITY OF THE MEMBER STATE(*)]

EASA Form 3-145 Issue 4

(*) Or EASA if EASA is the competent authority

(**) Delete for non-EU Member States or EASA

**MAINTENANCE ORGANISATION
TERMS OF APPROVAL**

Reference: [MEMBER STATE CODE (*)].145.[XXXX]

Organisation: [COMPANY NAME AND ADDRESS]

CLASS	RATING	LIMITATION	BASE	LINE
AIRCRAFT (**)	(***)	(****)	[YES/NO] (**)	[YES/NO] (**)
	(***)	(****)	[YES/NO] (**)	[YES/NO] (**)
	(***)	(****)	[YES/NO] (**)	[YES/NO] (**)
	(***)	(****)	[YES/NO] (**)	[YES/NO] (**)
ENGINES (**)	(***)	(***)		
	(***)	(***)		
COMPONENTS OTHER THAN COMPLETE ENGINES OR APUs (**)	(***)	(***)		
	(***)	(***)		
	(***)	(***)		
	(***)	(***)		
	(***)	(***)		
	(***)	(***)		
SPECIALISED SERVICES (**)	(***)	(***)		
	(***)	(***)		

These terms of approval are limited to those products, parts and appliances and to the activities specified in the scope of work section of the approved maintenance organisation exposition,

Maintenance Organisation Exposition reference:

Date of original issue:

Date of last revision approved: Revision No:

Signed:

For the competent authority: [COMPETENT AUTHORITY OF THE MEMBER STATE (*)]

EASA Form 3-145 Issue 4

(*) Or EASA if EASA is the competent authority

(**) Delete as appropriate if the organisation is not approved.

(***) Complete with the appropriate rating and limitation

(****) Complete with appropriate limitation and state whether the issue of airworthiness review certificates is authorised or not.

AMC1 Appendix III — Maintenance Organisation Approval referred to in Annex II (Part-145)

ED Decision 2022/011/R

The following fields on page 2 'Maintenance Organisation Terms of Approval' of the maintenance organisation approval certificate should be completed as follows:

- Date of original issue: It refers to the date of the original issue of the maintenance organisation exposition
- Date of last revision approved: It refers to the date of the last revision of the maintenance organisation exposition affecting the content of the certificate. Changes to the maintenance organisation exposition which do not affect the content of the certificate do not require the reissuance of the certificate.
- Revision No: It refers to the revision No of the last revision of the maintenance organisation exposition affecting the content of the certificate. Changes to the maintenance organisation exposition which do not affect the content of the certificate do not require the reissuance of the certificate.

GM1 Appendix III — Maintenance Organisation Certificate — EASA Form 3-145

ED Decision 2022/011/R

The expression 'or not' at the end of the footnote '(****)' on page 2 of 2 of the certificate does not constitute an obligation to introduce a negative statement in the terms of approval concerning the privilege to issue an airworthiness review certificate.

If the organisation holds the privilege to issue an airworthiness review certificate for an aircraft series, type and group, the competent authority will state it on the relevant line. If the organisation does not have that privilege, the competent authority may state it, but does not have to.

Appendix IV — Conditions for the use of staff not qualified in accordance with Annex III (Part-66) referred to in points 145.A.30(j)1 and 2

Regulation (EU) No 1321/2014

1. Certifying staff in compliance with all the following conditions are deemed to meet the intent of point [145.A.30\(j\)\(1\) and \(2\)](#):
 - (a) The person shall hold a licence or a certifying staff authorisation issued under national regulations in full compliance with ICAO Annex 1.
 - (b) The scope of work of the person shall not exceed the scope of work defined by the national licence or the certifying staff authorisation, whatever is the most restrictive.
 - (c) The person shall demonstrate he/she received the training on human factors and aviation legislation referred to in modules 9 and 10 of [Appendix I to Annex III \(Part-66\)](#).
 - (d) The person shall demonstrate 5 years maintenance experience for line maintenance certifying staff and 8 years for base maintenance certifying staff. However, those persons whose authorised tasks do not exceed those of a [Part-66](#) category A certifying staff, need to demonstrate 3 years maintenance experience only.
 - (e) Line maintenance certifying staff and base maintenance support staff shall demonstrate he/she received type training and passed examination at the category B1, B2 or B3 level, as applicable, referred to in [Appendix III to Annex III \(Part-66\)](#) for each aircraft type in the scope of work referred to in point (b). Those persons whose scope of work does not exceed those of a category A certifying staff may however receive task training in lieu of a complete type training.
 - (f) Base maintenance certifying staff shall demonstrate he/she received type training and passed examination at the category C level referred to in [Appendix III to Annex III \(Part-66\)](#) for each aircraft type in the scope of work referred to in point (b), except that for the first aircraft type, training and examination shall be at the category B1, B2 or B3 level of Appendix III.
2. Protected rights
 - (a) The personnel having privileges before the entry into force of the relevant requirements of [Annex III \(Part-66\)](#) may continue to exercise them without the need to comply with points 1(c) to 1(f).
 - (b) However after that date any certifying staff willing to extend the scope of their authorisation to include additional privileges shall comply with point 1.
 - (c) Notwithstanding point 2(b) above, in the case of additional type training, compliance with points 1(c) and 1(d) is not required.

Part-145 APPROVAL RECOMMENDATION REPORT		EASA FORM 6				
Part 2: Part-145 Compliance Audit Review						
The five columns may be labelled and used as necessary to record the approval class and/or product line reviewed. Against each column used of the following Part-145 points, please either tick (✓) the box if satisfied with compliance, or cross (X) the box if not satisfied with compliance and specify the reference of the Part 4 finding next to the box, or enter 'N/A' where an item is not applicable, or 'N/R' when applicable but not reviewed.						
Point	Subject					
145.A.25	Facility requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.30	Personnel requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.35	Certifying staff and support staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.37	Airworthiness review staff	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.40	Equipment and tools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.42	Components	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.45	Maintenance data	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.47	Production planning	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.48	Performance of maintenance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.50	Certification of maintenance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.55	Record-keeping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.60	Occurrence reporting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.65	Maintenance procedures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.70	Maintenance organisation exposition (MOE) (see Part 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.75	Privileges of the organisation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

145.A.85	Changes to the organisation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.95	Findings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.120	Means of compliance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.140	Access	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.155	Immediate reaction to a safety problem	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.200	Management system	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.202	Internal safety reporting scheme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
145.A.205	Contracting and subcontracting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Competent inspector(s):		Signature(s):				
Competent authority office:		Date of EASA Form 6 Part 2 completion:				

Part-145 APPROVAL RECOMMENDATION REPORT		EASA FORM 6
Part 3: Compliance with 145.A.70 Maintenance organisation exposition (MOE)		
Please either tick (√) the box if satisfied with compliance, or cross (X) if not satisfied with compliance and specify the reference of the Part 4 finding, or enter 'N/A' where an item is not applicable, or 'N/R' when applicable but not reviewed.		
PART 1	General	
1.1	<input type="checkbox"/>	Statement by the accountable manager
1.2	<input type="checkbox"/>	Safety policy and objectives
1.3	<input type="checkbox"/>	Management personnel
1.4	<input type="checkbox"/>	Duties and responsibilities of the management personnel
1.5	<input type="checkbox"/>	Management organisation chart
1.6	<input type="checkbox"/>	List of certifying staff, support staff and airworthiness review staff (Note: a separate document may be referenced)
1.7	<input type="checkbox"/>	Manpower resources
1.8	<input type="checkbox"/>	General description of the facilities at each address intended to be approved
1.9	<input type="checkbox"/>	Organisation's intended scope of work
1.10	<input type="checkbox"/>	Procedures for changes (including MOE amendment) requiring prior approval
1.11	<input type="checkbox"/>	Procedures for changes (including MOE amendment) not requiring prior approval
1.12	<input type="checkbox"/>	Procedure for alternative means of compliance (AltMoC)
PART 2	Maintenance procedures	
2.1	<input type="checkbox"/>	Supplier evaluation and subcontractor control procedure
2.2	<input type="checkbox"/>	Acceptance/inspection of aircraft components and material, and installation
2.3	<input type="checkbox"/>	Storage, tagging and delivery of components and material to maintenance
2.4	<input type="checkbox"/>	Acceptance of tools and equipment
2.5	<input type="checkbox"/>	Calibration of tools and equipment
2.6	<input type="checkbox"/>	Use of tooling and equipment by staff (including alternate tools)
2.7	<input type="checkbox"/>	Procedure for controlling working environment and facilities
2.8	<input type="checkbox"/>	Maintenance data and relationship to aircraft/aircraft component manufacturers' instructions including updating and availability to staff
2.9	<input type="checkbox"/>	Acceptance, coordination and performance of repair works
2.10	<input type="checkbox"/>	Acceptance, coordination and performance of scheduled maintenance works
2.11	<input type="checkbox"/>	Acceptance, coordination and performance of airworthiness directives works
2.12	<input type="checkbox"/>	Acceptance, coordination and performance of modification works
2.13	<input type="checkbox"/>	Maintenance documentation development, completion and sign-off
2.14	<input type="checkbox"/>	Technical records control
2.15	<input type="checkbox"/>	Rectification of defects arising during maintenance
2.16	<input type="checkbox"/>	Release to service procedure
2.17	<input type="checkbox"/>	Records for the person or organisation that ordered maintenance

Part-145 APPROVAL RECOMMENDATION REPORT		EASA FORM 6
Part 3: Compliance with 145.A.70 Maintenance organisation exposition (MOE)		
Please either tick (√) the box if satisfied with compliance, or cross (X) if not satisfied with compliance and specify the reference of the Part 4 finding, or enter 'N/A' where an item is not applicable, or 'N/R' when applicable but not reviewed.		
2.18	<input type="checkbox"/>	Occurrence reporting
2.19	<input type="checkbox"/>	Return of defective aircraft components to store
2.20	<input type="checkbox"/>	Defective components to outside contractors
2.21	<input type="checkbox"/>	Control of computer maintenance record systems
2.22	<input type="checkbox"/>	Control of man-hour planning versus scheduled maintenance work
2.23	<input type="checkbox"/>	Critical maintenance tasks and error-capturing methods
2.24	<input type="checkbox"/>	Reference to specific procedures
2.25	<input type="checkbox"/>	Procedures to detect and rectify maintenance errors
2.26	<input type="checkbox"/>	Shift/task handover procedures
2.27	<input type="checkbox"/>	Procedures for notification of maintenance data inaccuracies and ambiguities
2.28	<input type="checkbox"/>	Production planning and organising of maintenance activities
2.29	<input type="checkbox"/>	Airworthiness review procedures and records
2.30	<input type="checkbox"/>	Fabrication of parts
2.31	<input type="checkbox"/>	Procedure for component maintenance under aircraft or engine rating
2.32	<input type="checkbox"/>	Maintenance away from approved locations
2.33	<input type="checkbox"/>	Procedure for assessment of work scope as line or base maintenance
PART L2 Additional line maintenance procedures		
L2.1	<input type="checkbox"/>	Line maintenance control of aircraft components, tools, equipment, etc.
L2.2	<input type="checkbox"/>	Line maintenance procedures related to servicing/fuelling/de-icing, etc.
L2.3	<input type="checkbox"/>	Line maintenance control of defects and repetitive defects
L2.4	<input type="checkbox"/>	Line procedure for completion of technical logs
L2.5	<input type="checkbox"/>	Line procedure for pooled parts and loaned parts
L2.6	<input type="checkbox"/>	Line procedure for return of defective parts removed from aircraft
L2.7	<input type="checkbox"/>	Line procedure for critical maintenance tasks and error-capturing methods
PART 3 Management system procedures		
3.1	<input type="checkbox"/>	Hazard identification and safety risk management schemes
3.2	<input type="checkbox"/>	Internal safety reporting and investigations
3.3	<input type="checkbox"/>	Safety action planning
3.4	<input type="checkbox"/>	Safety performance monitoring
3.5	<input type="checkbox"/>	Change management
3.6	<input type="checkbox"/>	Safety training (including human factors) and promotion
3.7	<input type="checkbox"/>	Immediate safety action and coordination with the operator's ERP
3.8	<input type="checkbox"/>	Compliance monitoring
3.8.1	<input type="checkbox"/>	Audit plan and audit procedures

Part-145 APPROVAL RECOMMENDATION REPORT		EASA FORM 6
Part 3: Compliance with 145.A.70 Maintenance organisation exposition (MOE)		
Please either tick (√) the box if satisfied with compliance, or cross (X) if not satisfied with compliance and specify the reference of the Part 4 finding, or enter 'N/A' where an item is not applicable, or 'N/R' when applicable but not reviewed.		
3.8.2	<input type="checkbox"/>	Product audit and inspections
3.8.3	<input type="checkbox"/>	Audit findings — corrective action procedure
3.9	<input type="checkbox"/>	Certifying staff and support staff qualifications, authorisation and training procedures
3.10	<input type="checkbox"/>	Certifying staff and support staff records
3.11	<input type="checkbox"/>	Airworthiness review staff qualification, authorisation and records
3.12	<input type="checkbox"/>	Compliance monitoring and safety management personnel
3.13	<input type="checkbox"/>	Independent inspection staff qualification
3.14	<input type="checkbox"/>	Mechanics qualification and records
3.15	<input type="checkbox"/>	Process for exemption from aircraft/aircraft component maintenance tasks
3.16	<input type="checkbox"/>	Concession control for deviations from the organisation's procedures
3.17	<input type="checkbox"/>	Qualification procedure for specialised activities such as NDT, welding, etc.
3.18	<input type="checkbox"/>	Management of external working teams
3.19	<input type="checkbox"/>	Competency assessment of personnel
3.20	<input type="checkbox"/>	Training procedures for on-the-job training as per Section 6 of Appendix III to Part-66 (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same)
3.21	<input type="checkbox"/>	Procedure for the issue of a recommendation to the competent authority for the issue of a Part-66 licence in accordance with 66.B.105 (limited to the case where the competent authority for the Part-145 approval and for the Part-66 licence is the same)
3.22	<input type="checkbox"/>	Management system record-keeping
PART 4		Relationship with customer/operators
4.1	<input type="checkbox"/>	List of the commercial operators to which the organisation provides regular aircraft maintenance services
4.2	<input type="checkbox"/>	Customer interface procedures/paperwork
4.3	<input type="checkbox"/>	[Reserved]
PART 5		Supporting documents
5.1	<input type="checkbox"/>	Sample documents
5.2	<input type="checkbox"/>	List of subcontractors
5.3	<input type="checkbox"/>	List of line maintenance locations
5.4	<input type="checkbox"/>	List of contracted organisations
5.5	<input type="checkbox"/>	List of used AltMoC
PART 6		RESERVED
6.1	<input type="checkbox"/>	[Reserved]

Part-145 APPROVAL RECOMMENDATION REPORT		EASA FORM 6
<p>Part 3: Compliance with 145.A.70 Maintenance organisation exposition (MOE) Please either tick (√) the box if satisfied with compliance, or cross (X) if not satisfied with compliance and specify the reference of the Part 4 finding, or enter 'N/A' where an item is not applicable, or 'N/R' when applicable but not reviewed.</p>		
MOE Reference:		MOE Amendment:
Competent authority audit staff:		Signature(s):
Competent authority office:		Date of EASA Form 6 Part 3 completion:

Part-145 APPROVAL RECOMMENDATION REPORT		EASA FORM 6			
<p>Part 4: Findings — Part-145 Compliance status Each level 1 and 2 finding should be recorded, whether it has been rectified or not and should be identified by a simple cross-reference to the Part 2 requirement. All non-rectified findings should be copied in writing to the organisation for them to take the necessary corrective action.</p>					
Part 2 or 3 reference	Audit reference(s):	L E V E L	Corrective action		
	Findings		Date Due	Date Closed	Reference

Part-145 APPROVAL RECOMMENDATION REPORT		EASA FORM 6
Part 5: Part-145 Approval or continued approval or change recommendation*		
Name of organisation:		
Approval reference:		
Audit reference(s):		
The following Part-145 terms of approval are recommended for this organisation:		
Or, it is recommended that the Part-145 terms of approval specified in EASA Form 3 referenced should be continued.		
Name of recommending competent authority inspector:		
Signature of recommending competent authority inspector:		
Competent authority office:		
Date of recommendation:		
EASA Form 6 review:	Date:	
*delete as appropriate		

Appendix III to AMC1 145.A.15 — EASA Form 2

ED Decision 2022/011/R

The provisions of [Appendix IX to AMC M.A.602 and AMC M.A.702 EASA Form 2](#) apply.

Appendix IV to AMC5 145.A.30(e) and AMC2 145.B.200(a)(3) — Fuel Tank Safety Training

ED Decision 2022/011/R

This appendix includes general instructions for providing training on fuel tank safety issues.

A. Effectivity:

- Large aeroplanes as defined in Decision 2003/11/RM of the Executive Director of the Agency (CS-25) and certified after 1 January 1958 with a maximum type certified passenger capacity of 30 or more or a maximum certified payload capacity of 7500 lbs (3402 kg) cargo or more, and
- Large aeroplanes as defined in Decision 2003/11/RM of the Executive Director of the Agency (CS-25) which contains CS-25 amendment 1 or later in their certification basis.

B. Affected organisations:

- [Part-145](#) approved maintenance organisations involved in the maintenance of aeroplanes specified in paragraph A) and fuel system components installed on such aeroplanes when the maintenance data are affected by CDCCL.
- Competent authorities that are responsible for the oversight of the [Part-145](#) approved organisations specified in this paragraph B).

C. Persons from affected organisations who should receive training:

Phase 1 only:

- The group of persons representing the maintenance management structure of the organisation, the compliance monitoring manager, the safety manager and the staff who are directly involved in monitoring the compliance of the organisation.
- Personnel of the competent authorities who are responsible for the oversight of Part-145 approved maintenance organisations specified in paragraph B).

Phase 1 + Phase 2 + recurrent training:

- Personnel of the Part-145 approved maintenance organisation who are required to plan, perform, supervise, inspect and certify the maintenance of the aircraft and fuel system components specified in paragraph A).

D. General requirements of the training courses

Phase 1 – Awareness:

The training should be carried out before the person starts to work without supervision but not later than 6 months after joining the organisation. The persons who have already attended the Level 1 Familiarisation course in compliance with ED Decision 2007/002/R Appendix IV are already in compliance with Phase 1.

Type: It should provide awareness of the principal elements of the subject. It may take the form of a training bulletin, or any other self-study or informative session. The signature of the trainer is required to ensure that the person has passed the training.

Level: It should be a course at the level of familiarisation with the principal elements of the subject.

Objectives: The trainee should, after the completion of the training:

1. be familiar with the basic elements of the fuel tank safety issues,
2. be able to give a simple description of the historical background and the elements requiring a safety consideration, using common words and showing examples of non-conformities,
3. be able to use typical terms.

Content: The course should include:

- a short background showing examples of FTS accidents or incidents,
- the description of concept of fuel tank safety and CDCCL,
- some examples of manufacturers documents showing CDCCL items,
- typical examples of FTS defects,
- some examples of TC holders repair data,
- some examples of maintenance instructions for inspection.

Phase 2 – Detailed training

A flexible period may be allowed by the competent authorities to allow organisations to set up the necessary courses and provide the training to the personnel, taking into account the organisation's training schemes/means/practices. This flexible period should not extend beyond 31 December 2010.

The persons who have already attended the Level 2 Detailed training course in compliance with ED Decision 2007/002/R Appendix IV either from a Part-145 maintenance organisation or from a Part-147 training organisation are already in compliance with Phase 2 with the exception of recurrent training.

Staff should have received Phase 2 training by 31 December 2010 or within 12 months of joining the organisation, whichever comes later.

Type: It should be a more in-depth internal or external course. It should not take the form of a training bulletin, or any other self-study. At the end of the course, the trainees should be required to take an examination, which should be in the form of multiple-choice questions, and the pass mark of the examination should be 75%.

Level: It should be a detailed course on the theoretical and practical elements of the subject.

The training may be made either:

- in appropriate facilities containing examples of components, systems and parts affected by Fuel Tank Safety (FTS) issues. The use of films, pictures and practical examples on FTS is recommended; or
- by attending a distance course (e-learning or computer based training) including a film when such film meets the intent of the objectives and content here below. An e-learning or computer based training should meet the following criteria:
 - A continuous evaluation process should ensure the effectiveness of the training and its relevance;
 - Some questions at intermediate steps of the training should be proposed to ensure that the trainee is authorized to move to the next step;
 - The content and results of examinations should be recorded;

- Access to an instructor in person or at distance should be possible in case support is needed.

A duration of 8 hours for phase 2 is an acceptable compliance.

When the course is provided in a classroom, the instructor should be very familiar with the data in Objectives and Guidelines. To be familiar, an instructor should have attended himself a similar course in a classroom and made additionally some lecture of related subjects.

Objectives:

The attendant should, after the completion of the training:

- have knowledge of the history of events related to fuel tank safety issues and the theoretical and practical elements of the subject, have an overview of the FAA regulations known as SFAR (Special FAR) 88 of the FAA and of JAA Temporary Guidance Leaflet TGL 47, be able to give a detailed description of the concept of fuel tank system ALI (including Critical Design Configuration Control Limitations CDCCL, and using theoretical fundamentals and specific examples;
- have the capacity to combine and apply the separate elements of knowledge in a logical and comprehensive manner;
- have knowledge on how the above items affect the aircraft;
- be able to identify the components or parts of the aircraft subject to FTS from the manufacturer's documentation,
- be able to plan the action or apply a Service Bulletin and an Airworthiness Directive.

Content: Following the guidelines described in paragraph E).

Recurrent training:

The organisation should ensure that the recurrent training is required in each 2-year period. The syllabus of the training programme referred to in Chapter 3.9 of the maintenance organisation exposition (MOE) should include the additional syllabus for this recurrent training.

The continuation training may be combined with the phase 2 training in a classroom or at distance.

The continuing training should be updated when new instructions are issued which are related to the material, tools, documentation and manufacturer's or competent authority's directives.

E. Guidelines for preparing the content of Phase 2 courses.

The following guidelines should be taken into consideration when the phase 2 training programme are being established:

- (a) understanding of the background and the concept of fuel tank safety,
- (b) how the mechanics can recognise, interpret and handle the improvements in the instruction for continuing airworthiness that have been made or are being made regarding the fuel tank system maintenance,
- (c) awareness of any hazards especially when working on the fuel system, and when the Flammability Reduction System using nitrogen is installed.

Paragraphs a), b) and c) above should be introduced in the training programme addressing the following issues:

- (i) The theoretical background behind the risk of fuel tank safety: the explosions of mixtures of fuel and air, the behaviour of those mixtures in an aviation environment, the effects of temperature and pressure, energy needed for ignition etc, the 'fire triangle', - Explain 2 concepts to prevent explosions:
 - (1) ignition source prevention and
 - (2) flammability reduction,
- (ii) The major accidents related to fuel tank systems, the accident investigations and their conclusions,
- (iii) SFAR 88 of the FAA and JAA Interim Policy INT POL 25/12: ignition prevention program initiatives and goals, to identify unsafe conditions and to correct them, to systematically improve fuel tank maintenance),
- (iv) Explain the briefly concepts that are being used: the results of SFAR 88 of the FAA and JAA INT/POL 25/12: modifications, airworthiness limitations items and CDCCL,
- (v) Where relevant information can be found and how to use and interpret this information in the applicable maintenance data as defined in [145.A.45\(b\)](#),
- (vi) Fuel Tank Safety during maintenance: fuel tank entry and exit procedures, clean working environment, what is meant by configuration control, wire separation, bonding of components etc,
- (vii) Flammability reduction systems when installed: reason for their presence, their effects, the hazards of an FRS using nitrogen for maintenance, safety precautions in maintenance/working with an FRS,
- (viii) Recording maintenance actions, recording measures and results of inspections.

The training should include a representative number of examples of defects and the associated repairs as required by the TC/STC holders' maintenance data.

F. Approval of training

For [Part-145](#) approved organisations, the approval of the initial and continuation training programme and the content of the examination can be achieved by the change to the MOE. The necessary changes to the MOE to meet the content of this decision should be made and implemented at the time requested by the competent authority.