



Foreign Part 145 approvals User guide for Applicants	Doc #	UG.CAO.00006-001
	Approval Date	14/07/2010

Foreign Part 145 approvals

UG.CAO.00006-001

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**DOCUMENT CONTROL SHEET**

Process Area	Organisation approval
Main Process	Continuing Airworthiness Organisation Approval
Scenario	Foreign Part 145 approval
Process	All
Main Process Owner	Karl SPECHT

Reference documents**a) Contextual documents**

Commission Regulation (EC) 2042/2003 - Regulation of 20 November 2003 laying down implementing rules for the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L315, 28.11.2003)

Commission Regulation (EC) 216/2008 - Regulation of European Parliament and of Council of 20 Feb. 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency and repealing Council Directive 91/670/EEC, Regulation (EC) 1592/2002 and Directive 2004/36/EC

Commission Regulation (EC) 593/2007 - Regulation of 31 May 2007 on the fees and charges levied by the European Aviation Safety Agency Regulation (OJ L140, 01.06.2007)

EASA/FAA MIP - Maintenance Implementation Procedure (Applicable only to US Part 145 Approvals)

EASA/TCA AAM - Administrative Arrangement on Maintenance (Applicable only to Part 145 Canadian Approvals)

ED Decision 2003/19/RM - On AMC and GM to Commission Regulation (EC) 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

ED Decision 2007/019/R - On the "general Acceptable Means of Compliance for Airworthiness Product, Parts and Appliances (AMC20)".

EU/CAN BASA - Bilateral Aviation Safety Agreement (Applicable only to Part 145 Canadian Approvals)

EU/USA BASA - Bilateral Aviation Safety Agreement (Applicable only to US Part 145 Approvals)

MB decision 10-2007 - MB decisions No 10/2007 on outsourcing of tasks to NAAs or Qualified entities.

b) Internal documents

FO.TCC.00022-001 - Part 145 assignment request

IC - Part 145 CL F5 02 "Foreign P145 Change of Approval check list"

UG.CAO.00005-001 - Foreign Part 145 approvals User guide for NAA / EASA

UG.CAO.00024-000 - Foreign Part 145 approvals - User guide for Maintenance Organisation Exposition

WI.CAO.00004-001 - Foreign Part 145 approvals - Technical investigation process

WI.DRM.00017-001 - CAO records management

Log of issues

Issue	Issue date	Change description
001	14/07/2010	First issue (Reissue of QMS Procedure S.P041)



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0. Introduction



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0.2. Definitions and Abbreviations

Abbreviations	
AAM	ADMINISTRATIVE ARRANGEMENT ON MAINTENANCE (TCCA/EASA)
AAM-G	ADMINISTRATIVE ARRANGEMENT ON MAINTENANCE GUIDANCE
A&P	APPLICATIONS AND PROCUREMENTS SERVICES
AMC	ACCEPTABLE MEANS OF COMPLIANCE
AMO	APPROVED MAINTENANCE ORGANISATION
BASA	BILATERAL AVIATION SAFETY AGREEMENT (US/EUROPE)
CAA	CONTINUING AIRWORTHINESS AUTHORITY
CAMO	CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION
CAMOC	CONTINUING AIRWORTHINESS MANAGEMENT OVERSIGHT COORDINATOR
CAN145	CANADIAN PART 145
CAOM	CONTINUING AIRWORTHINESS ORGANISATIONS MANAGER
CAO	CONTINUING AIRWORTHINESS ORGANISATION
C/S	CERTIFYING STAFF
CC/S	COMONENT CERTIFYING STAFF
EASA	EUROPEAN AVIATION SAFETY AGENCY
EASATL	EASA TEAM LEADER
EU	EUROPEAN UNION
F145	FOREIGN PART 145
F147	FOREIGN PART 147
FAA	FEDERAL AVIATION ADMINISTRATION
GM	EASA GUIDANCE MATERIAL
MAST	MAINTENANCE STANDARDISATION TEAM
MIP	MAINTENANCE IMPLEMENTATION PROCEDURE
MIP-G	MAINTENANCE IMPLEMENTATION PROCEDURE GUIDANCE
MIST	MAINTENANCE INTERNATIONAL STANDARDISATION TEAM
MOA	MAINTENANCE ORGANISATION APPROVAL
MOAP	MAINTENANCE ORGANISATION APPROVAL PROCEDURES
MOC	MAINTENANCE OVERSIGHT COORDINATOR
MOE	MAINTENANCE ORGANISATION EXPOSITION
MOR	MANDATORY OCCURRENCE REPORTING
MTOA	MAINTENANCE TRAINING ORGANISATION APPROVAL
MTOAP	MAINTENANCE TRAINING ORGANISATION APPROVAL PROCEDURES
MTOC	MAINTENANCE TRAINING OVERSIGHT COORDINATOR
MTOE	MAINTENANCE TRAINING ORGANISATION EXPOSITION
NAA	NATIONAL AIRWORTHINESS AUTHORITY
NAATL	NAA TEAM LEADER
PE	PANEL OF EXPERTS
TCCA	TRANSPORT CANADA CIVIL AVIATION
US145	US PART 145
WG	WORKING GROUP
WH	WORKING HOURS
WHOC	WORKING HOURS EASA OVERSIGHT COORDINATOR



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0.3. Scope & Purpose

This user guide is dedicated to EASA Part 145 organisations based outside the EU Member States, the USA and Canada (hereinafter referred to as “Foreign Part 145 organisations”).

This User Guide is complementary to the requirements of Implementing Rule - Regulation EU 2042/2003 Annex II, Part-145 “as amended” and does not supersede or replace the information defined within this document.

The purpose of this user guide is to describe how the applicant should proceed when applying for an EASA Part 145 approval and how EASA will handle the initial investigation, continuation, change, limitation, suspension or revocation of the approval of the aforementioned organisation according to Annex II Part-145 of Regulation 2042/2003.

This user guide provides also explanations about technical matters.

All documents and correspondences between the Applicant, the overseeing authority and EASA shall be in the English language unless otherwise agreed by EASA.



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1. Initial approval



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1.1. Application to EASA Part 145 approval

A new application for an EASA Part 145 Maintenance Organisation Approval shall be made in accordance with Section B of Part 145 by using an EASA Form 2. This Application form shall be sent directly to EASA by surface mail, fax, e-mail, via the 'foreign 145' email box or online through EASA website.

Details about on the EASA's Regulation including fees and charges can be found on the EASA website (www.easa.europa.eu).

EASA Applications & Procurement Department will acknowledge receipt of the application by fax/email for applications not received via the 'Foreign 145' mailbox or "online", from which an acknowledgement of receipt is automatically sent.

EASA Applications & Procurement Department will check the application. When incorrect or incomplete information is supplied, EASA Applications & Procurement Department shall notify the applicant as soon as possible by letter or email detailing the omissions and errors.

Initial application package must include:

- o The EASA Form 2
- o The Certificate of Incorporation (certificate of trade registration) as detailed on the EASA Form 2 with a translation in English when necessary.

Guidance for calculating the number of staff working within the Part 145 organisation and to be declared in the EASA Form 2:

Part 145.A.30 d states that the organisation must have "sufficient staff to plan, perform, supervise, inspect and quality monitor the organisation in accordance with the approval"

The total number of staff as required by EASA Part-145 in order to obtain and hold the EASA Part-145 with the ratings listed on the approval schedule, and as further detailed in the exposition should include, but not be limited to;

The nominated Persons in accordance with Part 145.A.30 a & b - The Accountable Manager, Base Maintenance Manager, Line Maintenance manager, Workshop Manager, Quality Manager (dependant on the size and scope of the organisation).

This definition also includes other personnel including - post-holders, managers, supervisors, certifying staff, technicians and mechanics for aircraft, engines and components, NDT personnel, technical support personnel such as planners, engineers, technical record staff, librarians, quality control/assurance staff, specialised services staff, training staff, store department staff, purchasing department staff, ground equipment operators, contract staff in the above categories.

The numbers declared should also be reviewed against relevant chapters of the MOE including;

- 1.3 *Management personnel.*
- 1.4 *Duties and responsibilities of the management personnel.*
- 1.5 *Management Organisation Chart.*
- 1.6 *List of certifying staff.*
- 1.7 *Manpower resources.*
- 2.22 *Control of man-hour planning versus scheduled maintenance work*
- 2.28 *Production planning procedures.*
- 3.13 *Human Factors training procedure.*

The number of staff declared on EASA Form 2 will be confirmed to be consistent with the Part 145 requirements at the time of the initial audit. Incorrect information could lead to delays in granting of the approval.



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In case of refusal of an application, EASA Applications & Procurement Department will notify this decision in writing to the applicant together with the reasons thereto.

Once the application package is complete, the EASA CAO section checks the eligibility of the application according to Part-145 regulation.

When eligibility has been fully assessed, EASA Applications & Procurement Department calculates the fees according to the current fees and charge Regulation and sends "Fee level information" to the applicant for review and acceptance.

The applicant has to confirm the acceptance of the amount before the "initial application invoice" is sent to the applicant by the EASA Applications & Procurement Department. Payment must be received by EASA prior to any work commencing.

Upon receipt of payment by EASA, the applicant shall be informed by EASA Applications & Procurement Department of the following:

- Preliminary approval number with a suffix "P" indicating the pending status of the approval (for example EASA.145.XXXXP)
- Confirmation of receipt of payment of any fees associated with the initial application.

Note 2: In order to expedite the process the applicant is invited to draft a MOE using the MOE user Guide available on the EASA website and to prepare the applicable EASA Form 4s for the management personnel.

Note 3: In case of payment not received within 6 months from the date of application, the applicant will be notified that EASA terminated the application. Should the applicant wish to re-apply for an EASA Part 145 approval in the future, he will have to send a new application as detailed above.

1.2. Allocation of the investigation team

After eligibility of the application has been fully assessed and the invoice has been paid, the CAOM decides if the application is to be further processed internally by an EASATL or if the technical investigation is to be allocated to an external party.

In case the technical investigation is to be performed internally, the CAOM will establish an appropriate EASA certification team using EASA staff. The CAOM will inform EASA Applications & Procurement Department of his selection.

When not internally allocated the technical investigation can be allocated only to an EU NAA duly accredited and having appropriate contractual arrangements with EASA.

The Applicant is informed in writing about the allocated investigation team by the EASA Applications & Procurement Department.



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1.3. Initial technical investigation

1.3.1. MOE and Forms 4:

Upon receipt of the EASA allocation decision, the applicant shall provide the accredited NAATL or EASATL with the applicable EASA Forms 4 and a draft of the MOE established using the "EASA Part 145 Maintenance Organisation Exposition" user guide.

This user guide will also be used by the accredited NAATL or EASATL when performing the full review of the draft Exposition.

Pending the NAATL or EASATL is reviewing the draft of the MOE and the applicable EASA Forms 4, the Applicant's Quality department shall audit the Organisation in full for compliance with Regulation 2042/2003 and subsequent amendments. For an initial approval application, a statement signed by the Organisation Quality Assurance Manager shall always be provided before the audit takes place, confirming that documents, procedures, facilities and personnel subject to the application have been reviewed and audited showing compliance with all applicable requirements. The relevant audit report shall be provided by the Applicant upon request of the NAATL or EASATL.

1.3.2. Preparation of the investigation.

As soon as:

- the draft of the MOE,
- the EASA Forms 4
- the associated documents
- the Quality Assurance Manager statement
- the audit report if requested

are deemed acceptable, the accredited NAATL or EASATL initiates the investigation in accordance with Section B of Part 145, its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM) and Internal CAO procedures and work instructions.

The NAATL or EASATL will:

- Liaise with organisation for scheduling the audit
- Prepare and notify the Organisation with the audit plan



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1.3.3. On site investigation.

The EASATL or the NAATL should start the investigation audit with an opening meeting with the auditee's management and where possible with the Accountable Manager. The following points should be considered when carrying out the meeting:

- Confirmation of the audit schedule (including the scope of the audit).
- Explanation on the method used for reporting non conformities.

The EASATL or the NAATL shall meet the Accountable Manager during the visit.

The EASATL or the NAATL shall notify EASA MOC of any inconsistencies with the number of staff required to meet the manpower requirements of the approval scope and rating as detailed in EASA Part-145.A.30 and the manpower aspects of Part 145.A.30 (d) and as detailed in the approved MOE

A closing meeting chaired by the audit Team Leader will be held to present the audit findings and conclusions to the auditees in order to ensure that they are understood. The auditee will be given the opportunity to discuss any non compliance identified and suggest corrective actions and a timeframe for implementation.

Findings made during the investigation process will be handled by the EASATL or the NAATL according to Section B of Part-145 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

For an initial Audit the findings should not be classified as Level 1 or 2 as no action can be taken against the certificate. A maximum of three months shall be allowed to take corrective action for each finding raised during the initial audit. Failure to close these findings during this three months period could lead the Agency to terminate the application.

The formal notification of the findings must be sent to the Organisation by the EASATL or NAATL within a maximum of 15 calendar days from the end of the audit.

The EASATL or the NAATL will follow up the closure of all findings identified during the audit. When he/she is satisfied with the actions that have been taken by the Organisation in respect of the finding raised during the audit, he/she notifies the Organisation in writing that the non compliances are considered to be closed.

Depending on the extent and nature of findings and the related corrective actions, an additional audit may be necessary.

The EASATL or the NAATL shall immediately notify the CAOM if during the investigation process AMC 145.B.20 is used to reject a prospective accountable manager.

1.3.4. Recommendation:

Once compliance of the applicant with Part-145 has been established, the EASATL or the NAATL will recommend to EASA the Part 145 approval of the organisation. This includes the recommendation for MOE approval and management personnel acceptance.

For that purpose he/she will prepare a recommendation package to be reviewed for quality check by the NAA MOC. The recommendation package is then forwarded to EASA MOC.



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1.3.5. Issuance of an approval Certificate

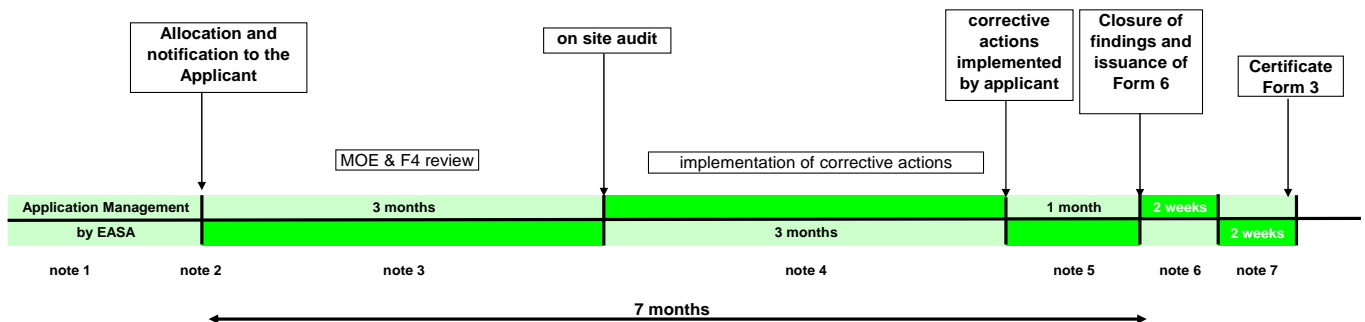
The recommendation package is reviewed by the EASA for compliance and accuracy. Once satisfied EASA will prepare for signature by EASA authorised persons:

- the certificate EASA Form 3
- the approval letter of the MOE together with its associated document and lists
- the nominated personnel EASA Form 4s acceptance letters

The EASA MOC will forward the original signed EASA Form 3 together with the relevant approval and acceptance letters to EASA Applications & Procurement Department. This department will establish the first annual surveillance fee invoice and send it attached to the above document to the applicant. The first annual invoice is due immediately after the issuance of the certificate.

1.4. Time frame

The normal time frame to process a PART 145 approval is about 8 months from the allocation date; however the amount of time taken is largely dependant on the ability of the applicant to produce the documentation required and to rectify any non conformity that may be identified during the certification process. Unless duly justified failure to meet this time frame might lead the Agency to terminate the application



- note 1: the MOE guidance is made available to the applicant
- note 2: The allocation is confirmed by the Purchase Order (NAAs) or the Involvement notification (EASATL). The applicant is informed by EASA regarding the allocated NAA to which MOE and Form 4 must be sent.
- note 3: MOE draft review by the team leader and correction by the applicant up to an acceptable level
- note 4: Implementation of corrective actions and notification to the Team Leader by the applicant.
- note 5: The Team Leader to close the findings and issue the Recommendation package
- note 6: Form 6 and TV quality check: 2 weeks NAA to review recommendation package and forward to EASA
- note 7: 2 weeks EASA to process the recommendation package and issue the certificate F3.



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2. Change to Part 145 approval



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2.1. Application for change

All changes as detailed in AMC 145.1.85 require a Form 2. An application for change of an EASA Part 145 Maintenance Organisation Approval shall be made in accordance with Section B of Part-145 by using the EASA Form 2. This Application form shall be sent directly to EASA by surface mail, fax, e-mail, via the 'foreign 145' email box or online through EASA website.

Details about on the EASA's Regulation including fees and charges regulation can be found on the EASA website (www.easa.europa.eu).

EASA Applications & Procurement Department will acknowledge receipt of the application by fax/email for applications not received via the 'Foreign 145' mailbox or "online", from which an acknowledgement of receipt is automatically sent.

EASA Applications & Procurement Department will check the application. When incorrect or incomplete information is supplied, EASA Applications & Procurement Department shall notify the applicant as soon as possible by letter or email detailing the omissions and errors.

Application for a change of Approval name must include the Certificate of Incorporation as detailed on the EASA Form 2.

For the definition of "number of staff" to be declared on the EASA Form 2, the paragraph related to "Initial technical investigation" applies.

In case of refusal of an application, EASA Applications & Procurement Department will notify this decision in writing to the applicant together with the reasons thereto.

Once the application package is complete, the EASA CAO section checks the eligibility of the application according to Part-145 regulation.

When eligibility has been fully assessed, EASA Applications & Procurement Department will Inform the NAA MOC or the EASA MOC that the application shall be processed.

In the mean time, the applicant shall forward to the Team Leader all documents related to the change.

2.2. Allocation of the investigation team

By default the investigation is performed by the assigned initial team. However, should it become necessary or more appropriate to allocate a different auditor, the CAOM makes the decision to allocate another NAA or EASATL, he/she will inform the EASA Applications & Procurement Department who will inform the selected NAA or EASATL together with the applicant in writing.

2.3. Technical Investigation for Change

To process a change the EASATL or the NAATL will proceed as detailed within paragraphs related to "Initial technical investigation".

Changes cannot be implemented prior to EASA formal approval. However, the EASATL or the NAATL shall liaise with the EASA MOC of all cases where the organisation wishes to operate in accordance with 145.B.35 (2).

Any proposed changes as listed in 145.A.85 shall be processed by the EASATL or the NAATL.

Changes requiring the addition or removal of a line station need to be processed using an EASA Form 2.



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However for all cases where an organisation wishes to have a line station located within the territory of the EU the NAA MOC/DA will notify the EASA MOC who will process the application in accordance with 145.B.15.



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3. Continued surveillance



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The continued surveillance is carried out every two years in accordance with the continued surveillance plan that can be sent by the EASATL or NAATL to the applicant upon request.

Normally the frequency of visits for continued surveillance shall consist of a minimum of one visit per year - period starting from the date the certificate was granted or from the last continuation date. This may be varied when agreed by the EASA MOC.

The criteria to be reviewed by the EASA MOC for changing audit visit frequency are as follows:

- a) Follow up of audits / findings
- b) Change to the approval
- c) Incident response
- d) Request by the Agency
- e) Large complex organisation

Every 24 months the EASATL or the NAATL will have to summarize the surveillance performed and if satisfied, to recommend EASA to continue the approval. For that purpose he/she will prepare a recommendation EASA form 6 (parts 1-5), a continued surveillance plan and the associated Technical Visa.

At the time of the continuation, recent findings having not reached yet the deadline may be still open. However according to 145.B.50, it should be clearly stated that the accredited NAA EASATL or the NAATL in charge of the recommendation is satisfied with the corrective action plan of any open finding made at the time of the recommendation.

The formal corrective action plan submitted by the Accountable Manager or the Quality Manager must be formally accepted by EASATL or NAATL.

After satisfactory quality check by the NAA MOC he/she shall forward the recommendation package to the EASA MOC.

When continued validity of the certificate is accepted the EASA MOC shall formally notify the approved maintenance organisation and copy in NAA MOC.

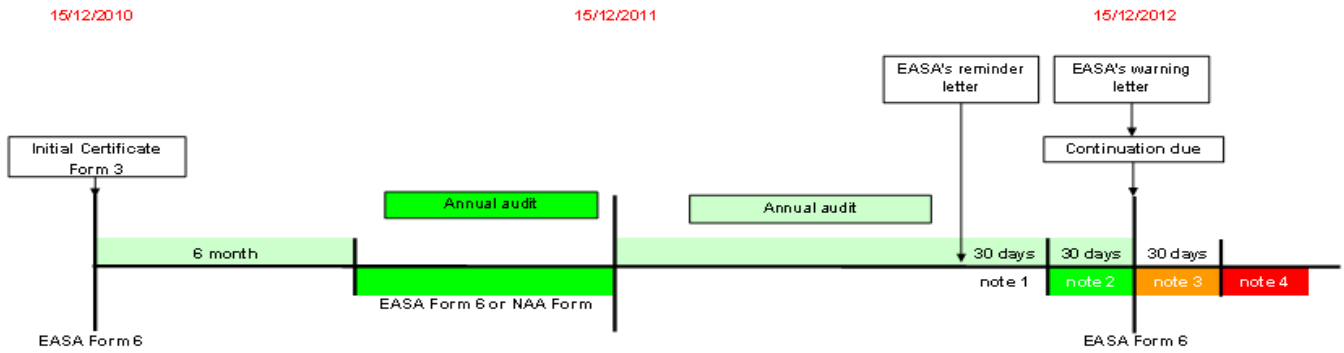
Findings made during the continued surveillance will be handled by the EASATL or the NAATL according to Section B of Part-145 and its associated Acceptable Means of Compliance (AMC) / Guidance Material (GM).

By default the continued surveillance is performed by the assigned initial team. However, should it become necessary or more appropriate to allocate a different auditor, the CAOM makes the decision to allocate another NAA or EASATL, he/she will inform the EASA Applications & Procurement Department who will inform the selected NAA or EASATL together with the applicant in writing.



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Part 145 - Continuation time frame



- note 1 : EASA to send a reminder letter 60 days BEFORE the due date.
- note 2 : the recommendation package should not be dated more than 30 days BEFORE the due date.
- note 3 : the recommendation package should not be dated more than 30 days AFTER the due date.
- note 4 : in case of "force majeure", a documented extension request is to be sent to EASA.



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4. Determination of the audit team



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The MOC will nominate an audit team made up of a team leader / members to carry out the investigation process. Normally, the number of auditors is limited to one. Cases for which more than one auditor is to be used must be justified by the EASATL or NAA MOC and agreed by EASA MOC prior to the investigation taking place.

The criteria applied by EASA to determine the investigation team are as follows:

- Complexity of the organisation approval
- Number of sites to be audited
- Type of audit (initial, changes, follow up audits, findings etc.)
- Size of the organisation
- Nature of the services to be covered by the AMO and its direct impact to aviation safety
- Appropriate technical experts (may include language needs)
- Any additional reason deemed necessary by EASA and justified by a specific situation

If the accredited NAA elects to use additional staff or trainees for an audit, EASA must be informed in advance. In such cases any associated costs will be borne directly by the NAA and not by the applicant or EASA.

Trainee staff from EASA may participate in investigation teams at no direct cost to the applicant.

When the investigation is allocated to an external party the NAA MOC shall be the single point of contact for liaison with the Agency. The external party shall follow all applicable provisions detailed in this procedure and section B to Part-145. The team leader of the external party will be responsible for complying with these procedures.



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5. Correspondence and focal points



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The “contact point notification” letter sent by EASA specifies the contact details of the overseeing authority. For any technical issue related to the approval the AMO shall contact the designated team leader.

For any administrative issue such as those related to fees and charges, invoices, the AMO shall directly contact EASA Application and Procurement department.

Any application for change will also have to be sent to EASA. The EASATL or NAATL could be copied in of the application Form 2 by the AMO.

EASA will directly send the formal approval of all documents related to the approval such as EASA Certificate form 3, accepted FORM 4s, MOE, associated procedures, lists and continuation letter to the applicant.

An audit report could be produced at the time of completion of the audit. But in any case the formal notification of the findings must be sent by the EASATL or NAATL to the Organisation within a maximum of 15 calendar days from the end of the audit.

In case of suspected Level one finding the EASATL or NAATL will have to liaise with EASA for confirmation of finding level.

When the level 1 finding is confirmed, the EASATL or NAATL will NOT transmit the audit report to the Organisation. However he/she will transmit a recommendation Form 6 to the EASA MOC /DA.

EASA will notify the finding(s) to the Organisation together with the decision against the approval.



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6. Maintenance Organisation Exposition



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EASA has developed a [user guide for Maintenance Organisation Exposition \(MOE\)](#) for Foreign EASA Part 145 Approval which is complementary to the requirements of Implementing Rule - Regulation EU 2042/2003 Annex II, Part-145 "as amended" and does not supersede or replace the information defined within this document.

This user guide is designed to be used by:

- Part 145 Maintenance Organisations - To assist them in the production of their own MOE.
- Competent Authority - As a comparison document for MOEs submitted to them for approval.

The user guide is provided for guidance only and should be customised by each organisation to demonstrate how they comply with Part 145. The organisation may choose to use another format as long as all the applicable sections of the regulation are addressed and cross-referenced.

- For each detailed procedure described within the MOE, the Part 145 organisation should address the following questions:
What must be done? Who should do it? When must be done? Where must it be done? How must it be done? Which procedure(s)/form(s) should be used?
- The MOE should be available in the English language however, it may also be written in a second language (English and the language of the country where the organisation is located) provided that the overseeing competent authority has agreed and EASA has finally accepted. In the case the MOE is written in English and in a second language, the English version shall prevail.
- The AMC 145.A.70 (a) (3) states: "When an organisation uses a different format, for example, to allow the exposition to serve for more than one approval,"
This AMC has to be read in conjunction with the EC 2042/2003 Article 1, thereby limiting the use of the EASA Part 145 MOE for approvals covered by the Basic Regulation. As a consequence the EASA MOE shall not make reference to any national approval and must be exclusively dedicated to EASA Part 145.



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7. Staff qualified in accordance with Appendix IV of Part 145.



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7.1. Purpose

This instruction is to be used by the Part 145 Quality System when issuing the procedure to assess Certifying Staff/ Support Staff (C/S) qualified in accordance with Part 145 Appendix IV instead of Part 66.

The Certifying staff / Support Staff assessment procedure should at least include the following:

- compliance to the various paragraphs of the Part 145 appendix IV (check list 1);
- More specifically compliance with paragraphs 1 (e) (f) requiring “a type training at a level corresponding to Appendix III” (check list 2).

The quality system shall review in an exhaustive manner the relevant files resulting from the implementation of the above procedures.

This instruction is complementary to the requirements of Implementing Rule - Regulation EU 2042/2003 Annex II, Part-145 “as amended” and does not supersede or replace the information defined within this document.

7.2. Assessment of the C/S & Support Staff to Appendix IV

As addressed above, the Quality system of the Foreign Part 145 organisation shall assess the certifying staff according to Part 145 and especially according to the Part 145 Appendix IV. The assessment report (Check list 1) which lists the training, education and work experience of each concerned nominated staff member in order to meet the intent of the Part 145 Appendix IV. Any differences must be highlighted and described. The assessment report should also detail any additional training given to individuals in order to meet the intent of Part 145 Appendix IV.

The assessment carried out by the foreign Part 145 organisation should contain the following:

1. Appendix IV paragraph 1.(a):

The basic license (national license) in all categories must have been evaluated by the Part 145 organisation as part of the assessment and any differences compared to ICAO Annex I must be addressed. Any difference between the basic license syllabus / examination must be addressed.

The organisation should detail within chapter 1.6 of the MOE the scope of the national licence by comparison to EASA C, B1, B2 and A categories.

2. Appendix IV paragraph 1.(b):

The proposed authorisation privileges must have been evaluated to ensure they do not exceed the scope of the national license.

3. Appendix IV paragraph 1.(c):

The certifying staff/support staff have received Human Factors and Aviation Legislation training (EASA Part 145) corresponding to Part 66 (module 9 & 10).



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4. Appendix IV paragraph 1.(d):

Details of the work experience of the nominated certifying staff/support staff with reference to Part 145 Appendix IV for the relevant category.

5. Appendix IV paragraph 1.(e) (f):

Evidence that the Aircraft Type Training given to certifying staff/support staff has either been followed in an EASA Part 147 approved MTO (with Part 147 certificate of recognition) or is equivalent to EASA Part 66 Appendix III (syllabus and examination).

6. Part 145.A.35 (e):

The assessment has to show that the certifying staff/support staff has demonstrated that he/she possesses the language knowledge needed to use technical instructions and manuals of the aircraft type he is assigned to. He/she should also be able to write technical entries and complete any maintenance documentation entries to an acceptable standard in English.

7. Part 145.A.35 (a) (d):

- When necessary, evidence has to be provided that shows that the certifying staff/support staff have received continuation training on the aircraft types specified on the EASA approval and where required, additional training on the aircraft systems differences, where such systems have not been previously included in the aircraft type training.
- Details of the Fuel Tank Safety training referring to Appendix IV to AMC to Part 145 per ED Decisions 2007/002/R & 2009-007/R.
- Details of EWIS training as and where applicable in accordance with AMC 20-22
- Evidence of relevant MOE training

7.3. Assessment of the type training.

This part is used for demonstration that the type training is at a level corresponding to EASA Part 66 Appendix III.

When a foreign Part 145 organisation intends to nominate certifying staff/support staff holding a Part 147 type training certificate for the considered A/C type, the following demonstration of equivalency is not required.

When a foreign Part 145 organisation intends to nominate certifying staff/support staff not having been type trained in an approved Part 147 maintenance training organisation (so does not hold a Part 147 type training certificate), the Quality system of the foreign Part 145 approval has to review and assess the following items using the check list 2:

1. Type training syllabus:

- Syllabus levels for the type training should be assessed for equivalence to Part 66 Appendix III for the relevant licence discipline;

2. Type training course length:

- Verification that the course length is equivalent to an EASA Part 147 course for the same or similar aircraft type.



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3. Type training course provider:

- Record the course provider. Assess if possible if the training documentation/ material came from a reputable source.

4. Category of type training:

- Make sure that the Licensed Aircraft Engineer's have completed a type training related to the scope of the national license (e.g. avionic = avionic type training course and not Airframe/power plant).

5. Theoretical and practical training:

- Verification that the course covers the theoretical and practical aspects. If the training covers only the theoretical aspect then the practical training shall be assessed separately. It should be noted that the practical training may have been carried out as structured OJT with the applicant.

6. Examination:

- Verify that individual training course certificates and the associated examination results are available.
- Verification that the exam result is at least equivalent to Part-66 requirements;
- Review, when available, the examination paper and assess the multi choice questions (number of multi choice question per hour of training, pertinence of the questions)

7.4. Approval of Certifying staff List and MOE.

In order to facilitate the Certifying staff assessment process, this instruction provides check lists. These check lists shall be attached to the list of certifying staff for approval submission.

The list of certifying staff approval process together with the Certifying staff assessment procedure shall be detailed within the exposition and approved by the competent authority.

The Certifying staff assessment procedure should at least include the following:

- compliance to the various paragraphs of the Part 145 appendix IV (check list 1);
- More specifically compliance with paragraphs 1 (e) (f) requiring "a type training at a level corresponding to Appendix III" (check list 2).

7.5. Records

The Quality system of the Organisation shall keep the assessment check lists together with the associated evidences for each individual C/S & Support Staff.

7.6. Check list 1: for reviewing the assessment for each individual C/S & Support Staff

PART 145 regulation		“A” equivalent	“B1” equivalent	“B2” equivalent	“C” equivalent	Document provided.
Requirements						
Name of the relevant Certifying Staff:						
1.	Part 145 Appendix IV(a): Do the certifying staff hold a licence or a certifying staff authorisation issued under the country's National regulations in compliance with ICAO Annex 1?	Yes	Yes	Yes	Yes	
	For base maintenance activities, the license to be considered is the license of the country where the main base is located. For the line stations activities the license to be considered is the license of the country where the main base is located or the license of the country where the line station is located.	No	No	No	No	
	Are there any differences between national license that need to be addressed?	Yes	Yes	Yes	Yes	
		No	No	No	No	
2.	Part 145 Appendix IV(b): Does the scope of work of the certifying staff remain within the scope of work defined by the National licence/certifying staff authorisation.	Yes	Yes	Yes	Yes	
		No	No	No	No	
3.	Part 145 Appendix IV(c): Have the certifying staff demonstrated that they have received training on human factors and airworthiness regulations as detailed in Part-66?	Yes	Yes	Yes	Yes	
		No	No	No	No	
4.	Part 145 Appendix IV(e): Have the certifying staff demonstrated five years maintenance experience for line maintenance certifying staff and eight years for base maintenance certifying staff?	3 years	5 years	5 years	8 years	
		Yes	Yes	Yes	Yes	
	Note: those persons whose authorised tasks do not exceed those of a Part-66 category A certifying staff, need only to demonstrate three years maintenance experience.	No	No	No	No	



	PART 145 regulation	"A" equivalent	"B1" equivalent	"B2" equivalent	"C" equivalent	Document provided.
	Requirements					
5.	Part 145.A.35: Have the certifying staff/Support staff sufficient language skill to communicate in the language of the maintenance data to a working level?	Yes No	Yes No	Yes No	Yes No	
6.	Part 145.A.35 (d): Have the certifying staff/support staff received continuation training that covers Technical Development including Human Factors, Fuel Tank Safety, EWIS and Aviation Regulation as applicable to the approval ratings and scope of work? and, if needed, special training on the aircraft maintained at the AMO facility if they are different from a standard aircraft.	Yes No	Yes No	Yes No	Yes No	
7.	ED decision 2009-007/R & Appendix IV to AMC to Part 145.A.30(e) Have the certifying staff/support staff received the initial Fuel Tank Safety training as detailed in the Appendix IV to AMC to Part 145.A.30(e)?	Yes No	Yes No	Yes No	Yes No	
8.	Have the certifying staff/support staff received a relevant MOE training?	Yes No	Yes No	Yes No	Yes No	
9.	Have the certifying staff/support staff received a type training in a Part 147 approved organisation? Note: When the C/S was not type trained in Part 147 Maintenance training Organisation (So does not hold a Part 147 type training certificate) check list 2 shall be filled-in.	Yes No	Yes No	Yes No	Yes No	

7.7. Check list 2 : for reviewing C/S & Support Staff not type trained in a Part 147 organisation

	Requirements	“A” equivalent	“B1” equivalent	“B2” equivalent	“C” equivalent	Document provided.
	Name of the relevant Certifying Staff:	A/C type :				
1.	Type training syllabus: Are the course syllabus levels and content equivalent to Part 66 Appendix III?	Yes No	Yes No	Yes No	Yes No	
2.	Type training course length: Is the course length equivalent to a part 147 course for the same or similar A/C type?	Yes No	Yes No	Yes No	Yes No	
3.	Type training course provider: Verify the supplier of the course.	Manufacturer Training school other	Manufacturer Training school other	Manufacturer Training school other	Manufacturer Training school other	
	Record the course provider (If possible determine if the training documentation/ material come from a reputable source)	Yes No	Yes No	Yes No	Yes No	
4.	Category of type training: Is the type training related to the scope of the national license (e.g. avionic = avionic type training course and not Airframe/power plant).?	Yes No N/C	Yes No N/C	Yes No N/C	Yes No N/C	
5.	Appendix IV to PART 145 (Appendix III to PART 66): Does the type course cover the theoretical and practical aspects?	Yes	Yes	Yes	Yes	



	Requirements	"A" equivalent	"B1" equivalent	"B2" equivalent	"C" equivalent	Document provided.
	Note: If the training covers only the theoretical aspect then the practical training shall be assessed separately.	No	No	No	No	
6.	Appendix IV to PART 145 (Appendix III to PART 66): Is the exam result at least 75 %?	Yes No	Yes No	Yes No	Yes No	
7.	Appendix IV to PART 145 (Appendix III to PART 66): Is the number of multi choice questions per hour of training equivalent to Part 66 and are they type related?	Yes No	Yes No	Yes No	Yes No	



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8. Component Certifying Staff



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8.1. Purpose

This instruction is to assist the Quality system in the process of validation of Component certifying staff. Component Certifying Staff (CC/S) means staff authorised by the Foreign Part 145 organisation to release Engines, APU and components under the Part 145 approval.

This instruction is complementary to the requirements of Implementing Rule - Regulation EU 2042/2003 Annex II, Part-145 "as amended" and does not supersede or replace the information defined within this document.

Part 145.A.30 (h) (1) required The Component certifying staff to comply with PART 66. However Part 66.A.200 stipulate that for certifying staff the relevant Member state (EU) regulation shall apply.

This means that the foreign Part 145 organisation should apply any of the EU Member states Rules related to the CC/S. However, for a standardisation purpose, when a foreign Part 145 organisation is nominating component certifying staff, the Foreign Part 145 organisation shall at least detail within its Maintenance Organisation exposition (MOE) the relevant CC/S authorisation procedures (initial and renewal) together with the adequate qualification criteria depending on the complexity of the component.

Criteria defined within the Local Aviation Authority** regulation could apply. However, where the national criteria are less restrictive than the one described below, the applicant should not be eligible for a Part 145 CC/S Authorisation.

** Local Aviation Authority: means the aviation authority of the country where the Foreign Part 145 Organisation has its principal place of business.

The current criteria applicable to CC/S are summarized within a table at the end of this chapter.

8.2. CC/S authorization procedure

8.2.1. Initial authorization process

The foreign Part 145 organisation shall detail in its Maintenance Organisation exposition the established prerequisites to be eligible as Part 145 Component Certifying Staff such as but not limited to:

- Education requirements;
- Basic Training requirements;
- Technical training requirements (for each component);
- Training on Bench test;
- Training on specific equipment;
- Aeronautical experience requirements;
- Language knowledge;
- Human Factor and aviation legislation training as per Part 66;
- Training on the AMO procedures;
- Training on the Fuel tank Safety as required;



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The foreign Part 145 organisation shall also detail in Maintenance Organisation Exposition:

- the Quality system assessment process for granting CC/S authorisation (the CC/S should also be assessed for competencies / training for the proposed scope of work and level of maintenance*);
- The CC/S records (responsibility, content of the CC/S files, etc,..);
- The management of the CC/S List;
- Management of the authorisation including:
 - The validity of the authorisation (maximum of 2 years).
 - Limitation(s) of the Part 145 authorisation vs the National License limitation(s) where necessary.

* level of maintenance means Overhaul, test, repair, Level 1, 2 and 3 for electronic / electric components as addressed in the CMM.

8.2.2. Authorization renewal process

The foreign Part 145 organisation shall detail in its MOE the CC/S authorization renewal prerequisites such as but not limited to:

- The continuation training requirements (Organisation procedures, new technology, human factor issues);
- The maintenance experience (6 months of relevant experience in the last 2 year period);
- Records of the experience
- The renewal assessment process;
- The CC/S records (responsibility, record of experience, content of the CC/S files);
- Management of the CC/S List;
- Validity of the authorization (maximum of 2 years).

8.3. The Education requirements;

The minimum educational level should be a school level or apprenticeship justified by the appropriate certificates.

8.4. Basic Training requirements;

The CC/S should be able to demonstrate he/she received a basic training on the appropriate field:

- an aeronautical school diploma or certificate or,
- a technical school diploma / certificate, if the intended scope of work concerns non complex electrical components or instruments and cabin and safety equipments or,
- an aeronautical military school diploma or certificate.

Depending on the complexity of the intended scope of authorization, a higher level of the basic training should be considered.

8.5. Technical / component training requirements:

The CC/S should be able to demonstrate he/she received appropriate theoretical and practical component training from:



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- the OEM or
- the OEM recognized training organization or
- An appropriately rated PART 145 organization provided:
 - the person nominated to carry out the training can demonstrate he/she has received training to an appropriate level for the subject component;
 - the person nominated to carry out the training is appropriately authorized by the part 145 Organization and is able to demonstrate a significant experience on the relevant component maintenance;
 - the training syllabus has been reviewed by the Engineering Manager and/or the Quality Manager;
 - The component is available for practical training purpose;

- Bench test training

Where there is a need to use Bench test (e.g. engine or ATEC bench test), the CC/S should be able to demonstrate he/she received an appropriate training. This training for the use of specific tools required by the OEM maintenance data should be received from:

- The OEM or
- The bench test manufacturer or
- An appropriately rated PART 145 organization

- specific equipment training

Where there is a need to use specific equipment, the CC/S should be able to demonstrate he/she received an appropriate training. This training for the use of specific tools required by the OEM maintenance data should be received from:

- The OEM or
- The specific tool manufacturer or
- An appropriately rated PART 145 organization.

- Aeronautical experience requirements;

The CC/S should be able to demonstrate at least 2 years of Aeronautical experience in the field of aviation maintenance.

- Language Knowledge:

The CC/S should be able to demonstrate a working knowledge of the language in which the maintenance data is published + English if required for EU Airworthiness directives.

- Human Factor and aviation legislation training as per Part 66:

The CC/S should be able to demonstrate he/she received a Human Factor and aviation Legislation training as detailed in the Part 66.

- Training to the MOE procedures;

The CC/S should be able to demonstrate he/she received an appropriate training to the MOE and internal procedures applicable to CC/S (including issuance of EASA form 1)

- Training on the Fuel Tank Safety

Where needed, the CC/S should demonstrate he/she received an appropriate training on the Fuel Tank Safety items, CDCCL level 1, or level 2 after 31/12/2010, (refer to Appendix IV to AMC to 145.A.30(e) and 145.B.10(3) for further details).

- Training on Electrical Wiring Interconnection System


Where needed, the CC/S should demonstrate he/she received an appropriate training on EWIS.



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8.6. Approval of Component Certifying staff List and MOE.

The list of Certifying Staff including Component Certifying Staff approval process together with the Component Certifying Staff qualification criteria shall be detailed within the exposition and approved by the competent authority.

	European Aviation Safety Agency		User Guide	
	User guide for NAA / EASA: Component certifying staff		Doc #	UG.CAO.00005-000
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8.7. Summary table for Foreign PART 145 Component C/S qualification

	Engine/APU/ Propeller	Hydraulic components (L/G assy, actuator, etc ..)	Electrical components (Motors, actuators, chargers, power supplies, batteries, etc..)	Electronic components (card assy, mike, head set, etc...)	Mechanical components (wheel, Brake unit, structure,..)	Electronic Units (computers, com/nav receiver, indicators, power supplies,)	Instruments	Cabin Equipment (BFE, PSU, Pax Entertainment)	Safety equipment (life raft, life jacket, O ² bottle, O ² masks,..)
Educational level	Secondary school	Secondary school	Secondary school	Secondary school	Secondary school	Secondary school	Secondary school	Secondary school	Secondary school
Basic training level	- Aeronautical & technical school - Aeronautical military school - QA assessment	- Aeronautical & technical school - Aeronautical military school - QA assessment.	- Technical school - Aeronautical military school - QA assessment.	- Aeronautical & technical school - Aeronautical military school - QA assessment	- Aeronautical & technical school - Aeronautical military school - QA assessment	- Aeronautical & technical school - Aeronautical military school - QA assessment.	- Technical school - Aeronautical military school - QA assessment	- Technical school - Aeronautical military school - QA assessment.	- Technical school - Aeronautical military school - QA assessment.
Component training	- OEM - OEM recognised Training Org.	- OEM - OEM recognised Training Org. - Part 145 AMO	- OEM - OEM recognised Training Org. - Part 145 AMO	- OEM - OEM recognised Training Org. - Part 145 AMO	- OEM - OEM recognised Training Org. - Part 145 AMO	- OEM - OEM recognised Training Org. - Part 145 AMO	- OEM - OEM recognised Training Org. - Part 145 AMO	- OEM - OEM recognised Training Org. - Part 145 AMO	- OEM - OEM recognised Training Org. - Part 145 AMO
Tool training	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO
Bench test qualification	- OEM of the bench test	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO	- OEM - Part 145 AMO
Practical experience	2 YEARS	2 YEARS	2 YEARS	2 YEARS	2 YEARS	2 YEARS	2 YEARS	2 YEARS	2 YEARS
Continuing training	- OEM - Part 145 AMO - OEM recognized Training Org.	- OEM - Part 145 AMO - OEM recognized Training Org.	- OEM - Part 145 AMO - OEM recognized Training Org.	- OEM - Part 145 AMO - OEM recognized Training Org.	- OEM - Part 145 AMO - OEM recognized training Org.	- OEM - Part 145 AMO - OEM recognized Training Org.	- OEM - Part 145 AMO - OEM recognized Training Org.	- OEM - Part 145 AMO - OEM recognized Training Org.	- OEM - Part 145 AMO - OEM recognized training Org.



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9. NDT level III



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This instruction is to provide the Quality System with additional information about NDT under Part 145 approval.

This instruction is complementary to the requirements of Implementing Rule - Regulation EU 2042/2003 Annex II, Part-145 "as amended" and does not supersede or replace the information defined within this document.

The NDT system of the AMO should follow EN 4179 standard with the additional requirement of oversight by an NDTB. This NDTB can be located in one of the member states of the EU or a national NDTB acceptable to the competent authority.

Any NDT staff should be qualified in accordance EN 4179 or other recognised Standards such as NAS 410 acceptable to the competent authority.

An organisation may carry out NDT tasks either under its D1 rating or in the "course of the maintenance" under A, B or C rating.

In both cases:

- a. The MOE Chapter 1.9 should list all NDT methods implemented within the AMO.
- b. The AMO should have a responsible level III NDT (AMO employee or contracted) who is tasked for:
 - The qualification of Level I and II NDT staff;
 - Issuing the internal qualification procedures of NDT staff;
 - Issuing the technical procedures (writing practices, control of tools, control of material,..).

The AMO should ensure that the responsible level III NDT:

- Holds a valid authorization issued by the related NDTB.
- Is adequately rated in accordance with the Part 145 scope of approval.

Whatever the Organisation holds a D1 rating or carries out NDT tasks in the "course of maintenance" under A, B and C rating, the procedure related to NDT should be detailed within the MOE.



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10. Corrective actions and level 1 finding



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In case of non compliance with Part 145, the Organisation is formally notified by the surveyor.

For any finding, the quality system of the organisation should propose a corrective action or a corrective action plan designed in a way which allows identifying and recording:

- the finding,
- the root cause,
- the relevant immediate action,
- the long term preventive action,
- the appropriate timescales.

When the surveyor identifies a significant non compliance with Part 145, he/she must get a formal confirmation from EASA that the finding is a level 1.

In that case the organisation will not receive the audit report from the Surveyor but will be formally notified of the finding(s) by EASA together with the decision against the approval.

For any level 1 finding, the organisation should, as part of the immediate actions:

- 1) Identify the Part-145 maintenance release certificates signed that are concerned by the finding (aircraft / engine / part / component),
- 2) Inform the relevant customer and the competent authority,
- 3) Take the appropriate maintenance



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RECORDS

No record associated with this User Guide.