



## Draft Decision

in accordance with Art. 16 (Accelerated procedure) of MB Decision  
No 18-2015

# Task force for the review of Part-M for general aviation (PHASE II)

RMT.0547

## EXECUTIVE SUMMARY

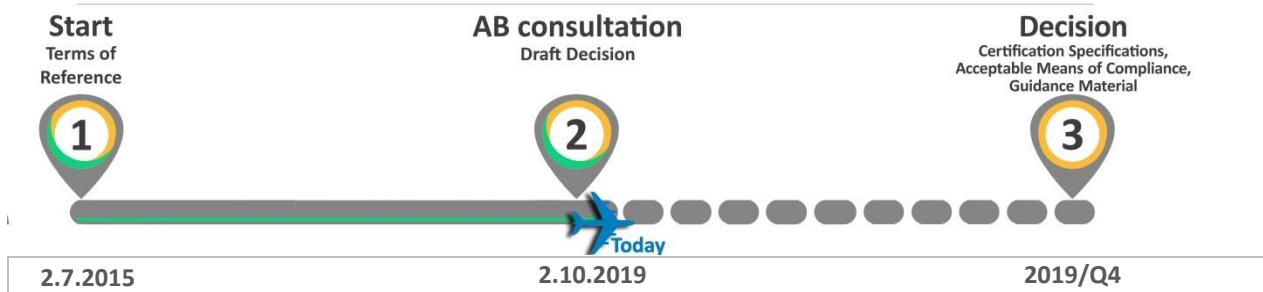
Following the introduction of Part-ML and Part-CAO as new Annexes to Regulation (EU) No 1321/2014 through the amending Regulation (EU) 2019/1383 (applicable from 24 March 2020), the objective of this draft Decision is to propose acceptable means of compliance (AMC) & guidance material (GM) in order to facilitate the implementation of the requirements in these new annexes. EASA published a first draft of AMC & GM to Part-ML in Comment-Response Document (CRD) 2015-08. This material was further developed and new AMC & GM to Part-CAO were developed in consultation with the Part-M GA Task Force.

In particular, this draft Decision proposes a new template EASA Form AMP that may be used to produce the aircraft maintenance programme (AMP), a detailed acceptable minimum inspection programme (MIP) compliant with ML.A.302(d), and the layout of an acceptable combined airworthiness exposition (CAE). In addition, this draft Decision incorporates AMC & GM relevant to maintenance check flights (MCFs), which were initially proposed as AMC & GM to Part-M through RMT.0393 & RMT.0394.

This draft Decision is proposed for consultation by the Advisory Bodies (GA.COM, GA.TeB, EM.TEC and P&CA TeB) through an accelerated procedure. It is not affected by the draft Regulation to be discussed at the next EASA Committee in October 2019 that aims to amend and correct some provisions laid down in Regulation (EU) 2019/1383.

Action area:	General aviation		
Affected rules:	n/a		
Affected stakeholders:	AMOs (Part-145 and Part-M Subpart F); CAMOs; operators other than airlines; GA; CAs		
Driver:	Efficiency/proportionality	Rulemaking group:	Yes
Impact assessment:	Ref.: Opinion No 05/2016	Rulemaking Procedure:	Accelerated

- EASA special rulemaking procedure milestones



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## 1. About this draft Decision

### 1.1. How this draft decision was developed

The European Union Aviation Safety Agency (EASA) developed this regulatory proposal in line with Regulation (EU) 2018/1139<sup>1</sup> (the ‘Basic Regulation’) and the Rulemaking Procedure<sup>2</sup>. This rulemaking activity is included in the European Plan for Aviation Safety (EPAS) [2019-2023](#) under rulemaking task RMT.0547.

Part-ML and Part-CAO have been proposed by EASA through Opinion No 05/2016, in consultation with the Part-M GA Task Force. The Commission adopted the resulting amending Regulation (EU) 2019/1383<sup>3</sup> and, on 4 September 2019, published it in the Official Journal of the European Union.

EASA published a first draft of AMC & GM to Part-ML in NPA 2015-08 and Comment-Response Document (CRD) 2015-08, and further developed these AMC & GM, as well as new AMC & GM to Part-CAO in consultation with the Part-M GA Task Force.

The text of this draft Decision for AMC & GM to Part-ML and Part-CAO has been developed by EASA and will undergo consultation with the Advisory Bodies (GA.COM, GA.TeB, EM.TEC and P&CA TeB) in accordance with Article 16 ‘Special rulemaking procedure: accelerated procedure’ of MB Decision No 18-2015. The use of this special rulemaking procedure is supported by the fact that the development of AMC & GM is not considered to be controversial since AMC & GM do not create additional obligations on the regulated persons or organisations. The objective is to allow timely availability of AMC & GM to Part-ML and Part-CAO, which are required to support the implementation of these new Annexes to Regulation (EU) No 1321/2014<sup>4</sup>.

Prior to the consultation with the Advisory Bodies, EASA performed a focused consultation on this regulatory proposal with the experts of the Part-M GA Task Force, who were involved in the development of Opinion No 05/2016. To this end, draft material was shared prior to, and reviewed during, a meeting with the experts on 17 and 18 June 2019 in Cologne.

<sup>1</sup> Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139>).

<sup>2</sup> EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the ‘Rulemaking Procedure’. See MB Decision No 18-2015 of 15 December 2015 replacing Decision 01/2012 concerning the procedure to be applied by EASA for the issuing of opinions, certification specifications and guidance material (<http://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-18-2015-rulemaking-procedure>).

<sup>3</sup> Commission Implementing Regulation (EU) 2019/1383 of 8 July 2019 amending and correcting Regulation (EU) No 1321/2014 as regards safety management systems in continuing airworthiness management organisations and alleviations for general aviation aircraft concerning maintenance and continuing airworthiness management (OJ L 228, 4.9.2019, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1568109962211&uri=CELEX:32019R1383>).

<sup>4</sup> Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1568111870780&uri=CELEX:32014R1321>).

This draft decision also incorporates a new AMC and new GM to Part-ML related to MCFs. Said AMC & GM are based on AMC & GM developed by RMT.0393 & RMT.0394 (MDM.097(a)&(b)) for Part-M (ref. AMC M.A.801(g) and GM M.A.301(8)), and proposed through Opinion No 01/2017.

### 1.2. How to comment on this draft Decision

Please submit your comments via email to [Maint\\_AB@easa.europa.eu](mailto:Maint_AB@easa.europa.eu)

The deadline for submission of comments is **30 October 2019**.

### 1.3. The next steps

Based on the comments received, EASA will develop a decision that issues the acceptable means of compliance (AMC) and guidance material (GM) to Part-ML and Part-CAO of Regulation (EU) No 1321/2014. A summary of the comments received as well as the EASA position on them will be provided in the explanatory note to the decision.



## 2. In summary — why and what

### 2.1. Why we need to change the rules — issue/rationale

Part-ML and Part-CAO are entirely new Annexes to Regulation (EU) No 1321/2014, introduced by the amending Regulation (EU) 2019/1383. In accordance with Article 76 of the Basic Regulation, EASA shall issue AMC & GM for the application of Regulation (EU) No 1321/2014.

The rationale for adopting Part-ML and Part-CAO was to establish continuing airworthiness aircraft standards, and a new simplified organisation, proportional to the risks of the General Aviation community.

### 2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. This proposal will contribute to the achievement of the overall objectives by addressing the issues outlined in Section 2.1.

The specific objectives of this proposal are to:

- support the industry and Member States with the entry into force of Part-ML and Part-CAO;
- help in the uniform implementation of these new requirements and privileges;
- keep the number of AMC & GM (to Part-ML and Part-CAO) manageable not to overwhelm the GA community;
- reflect current industry practice, for example in relation to assessing whether an aircraft operation falls under the regime defined for commercial approved training organisation (ATO)/declared training organisation (DTO); and
- establish an appropriate standard for conducting MCFs and address the safety gap identified in the accidents/incident referred to in the ToR of RMT.0393 & RMT.0394 (MDM.097(a)&(b)).

### 2.3. How we want to achieve it — overview of the proposals

The main elements proposed in these draft AMC & GM are the following:

- Explanation and guidance on the main provisions, responsibilities, privileges and alleviations introduced by Part-ML and Part-CAO (e.g. GM1 ML.A.201; GM2 ML.A.302; GM1 ML.A.901; GM1 CAO.A.095; GM1 CAO.A.100(e));
- Clarification on the use of EASA Form 1 issued by Part-CAO organisation (GM1 CAO.A.070);
- Templates of documents used for complying with the regulation, such as the AMP (AMC2 ML.A.302) or the CAE (AMC1 CAO.A.025);
- Guidance and methods for the AMP development (e.g. GM1 ML.A.302(c)(2)(b); GM1 ML.A.302(c)(3); AMC1 ML.A.302(c)(4)) and aspects to be considered in a risk based approach to extend the time between overhaul (TBO) intervals (AMC1 ML.A.302(c));
- Details of acceptable MIPs compliant with ML.A.302(d) (AMC1 ML.A.302(d));
- Existing key AMC and GM to Part-M introduced for Part-ML and Part-CAO, such as embodiment of a standard change/repair (AMC1 ML.A.801 based on AMC M.A.801), fabrication by Part-CAO



organisation (AMC1 CAO.A.020(c) based on AMC M.A.603(c)), quality system (AMC1 CAO.A.100(b) based on AMC M.A.712(b));

- Examples of aircraft not considered to be operated by a commercial ATO or a commercial DTO (GM2 ML.A.201(e));
- Support in determining when an MCF should be performed and under which protocol and responsibilities (AMC1 ML.A.801(g) and GM1 ML.A.301(f)).



### 3. Proposed amendments

Because Part-ML and Part-CAO are new Annexes to Regulation (EU) No 1321/2014, the text of the proposed AMC and GM to Part-ML and Part-CAO is also new. Therefore, no highlight is applied and the draft AMC and GM are presented in plain text.

The rationales behind the proposed AMC and GM to Part-ML and Part-CAO can be found in chapter 6. Appendix.

#### 3.1. Draft AMC and GM to Part-ML (draft EASA decision)

## SECTION A TECHNICAL REQUIREMENTS

### GM1 ML.A.201 Responsibilities

Summary of Part-ML main provisions and alleviations established in ML.A.201, ML.A.302, ML.A.801 and ML.A.901:

		Balloon	
		non Subpart-ADD	
		commercial ATO/DTO	non ATO/DTO or non-commercial ATO/DTO
Contract with CAMO/CAO required?	yes	yes	no*
AMP	The AMP document must be approved by the contracted CAMO/CAO	If there is no CAMO/CAO, the AMP must be declared by the owner.  If there is a contracted CAMO/CAO, the AMP must be approved by the CAMO/CAO.	If ML.A.302(e) conditions are met, producing an AMP document is not required.
Maintenance	By maintenance organisation	By maintenance organisation or by independent certifying staff or pilot-owner**	
AR and ARC	By maintenance organisation*** or by the contracted CAMO/CAO or by competent authority	By maintenance organisation*** or independent certifying staff*** or by CAMO/CAO (if contracted) or by competent authority	



	Sailplane		
	Subpart-DEC	non Subpart-DEC	
		commercial ATO/DTO	non ATO/DTO or non-commercial ATO/DTO
Contract with CAMO/CAO required?	yes	yes	no*
AMP	The AMP document must be approved by the contracted CAMO/CAO.		If there is no CAMO/CAO, the AMP must be declared by the owner.
			If there is a contracted CAMO/CAO, the AMP must be approved by the CAMO/CAO.
	If ML.A.302(e) conditions are met, producing an AMP document is not required.		
Maintenance	By maintenance organisation		By maintenance organisation or by independent certifying staff or pilot-owner**
AR and ARC	By maintenance organisation*** or by the contracted CAMO/CAO or by competent authority		By maintenance organisation*** or independent certifying staff*** or by CAMO/CAO (if contracted) or by competent authority

	Aircraft (other than balloon and sailplane)		
	non Part-NCO	Part-NCO	
		commercial ATO/DTO	non ATO/DTO or non-commercial ATO/DTO
Contract with CAMO/CAO required?	yes	yes	no*
AMP	The AMP document must be approved by the contracted CAMO/CAO.		If there is no CAMO/CAO, the AMP must be declared by the owner.
			If there is a contracted CAMO/CAO, the AMP must be approved by the CAMO/CAO.
	If ML.A.302(e) conditions are met, producing an AMP document is not required.		
Maintenance	By maintenance organisation		By maintenance organisation or by independent certifying staff or pilot-owner**
AR and ARC	By maintenance organisation*** or by the contracted CAMO/CAO or by competent authority		By maintenance organisation*** or independent certifying staff*** or by CAMO/CAO (if contracted) or by competent authority

\*: CAMO/CAO is not required but the owner may decide to contract a CAMO/CAO.

\*\*: A maintenance organisation is mandatory for overhaul of certain components

\*\*\*: together with the 100-h/annual inspection



## GM2 ML.A.201(e) Responsibilities

### COMMERCIAL ATO/DTO

According to industry practice, the following are examples of aircraft not considered to be operated by a commercial ATO or a commercial DTO:

- (a) Aircraft operated by an organisation holding an ATO certificate or a DTO declaration, created with the aim of promoting aerial sport or leisure aviation, on the condition that:
  - (1) the aircraft is operated by the organisation on the basis of ownership or dry lease;
  - (2) the flight does not generate profits distributed outside of the organisation; and
  - (3) whenever non-members of the organisation are involved, such flights represent only a marginal activity of the organisation (e.g. flying club or aero club).
- (b) Aircraft operated under Part-NCO by its owner together with an ATO or a DTO flight instructor for the purpose of training, when the contract between the owner and the training organisation and the procedures of the training organisation allows it. The continuing airworthiness of such aircraft remains under the responsibility of the owner, or of the CAMO or CAO contracted by the owner, if the owner has elected to contract a CAMO or CAO in accordance with ML.A.201(f).

## GM1 ML.A.201(f) Responsibilities

If an owner (see definition in point ML.1(c)(3)) decides not to make a contract with a CAMO or CAO, the owner is fully responsible for the proper accomplishment of the corresponding continuing airworthiness management tasks. As a consequence, it is expected that the owner properly and realistically self-assesses his or her own competences to accomplish those tasks or otherwise seek the necessary expertise.

## AMC1 ML.A.202 Occurrence reporting

Accountable persons or organisations should ensure that the design approval holder receives adequate reports of occurrences for that aircraft or component, to enable the design approval holder to issue appropriate service instructions and recommendations to all owners or operators.

Accountable persons or organisations should establish a liaison with the design approval holder to determine whether published or proposed service information will resolve the problem or to obtain a solution to a particular problem.

AMC-20 'General Acceptable Means of Compliance for Airworthiness of Products, Parts and Appliances' provides further details on occurrence reporting (AMC 20-8).

## GM1 ML.A.301(f) Responsibilities

### Maintenance check flights (MCFs)

(a) The definition of and operational requirements for MCFs are laid down in the Air Operations Regulation<sup>5</sup> and are carried out under the control and responsibility of the aircraft operator. During the flight preparation, the flight and the post-flight activities as well as for the aircraft handover, the processes requiring the involvement of maintenance personnel or organisations should be agreed in advance with the operator. The operator should consult as necessary with the person or organisation in charge of the airworthiness of the aircraft.

(b) Depending on the aircraft defect and the status of the maintenance activity performed before the flight, different scenarios are possible and are described below:

(1) The aircraft maintenance manual (AMM), or any other maintenance data issued by the design approval holder, requires that an MCF be performed before completion of the maintenance ordered. In this scenario, a certificate after incomplete maintenance, when in compliance with ML.A.801(f) or 145.A.50(e), should be issued and the aircraft can be flown for this purpose under its airworthiness certificate.

Due to incomplete maintenance, for aircraft used in commercial air transport, it is advisable to open a new entry on the aircraft technical log system to identify the need for an MCF. This new entry should contain or refer, as necessary, to data relevant to perform the MCF, such as: aircraft limitations and any potential effect on operational and emergency equipment due to incomplete maintenance, maintenance data reference and maintenance actions to be performed after the flight.

After a successful MCF, the maintenance records should be completed, the remaining maintenance actions finalised and the aircraft released to service in accordance with the maintenance organisation's approved procedures.

(2) Based on its own experience and for reliability considerations and/or quality assurance, an operator, owner, CAO or CAMO may wish to perform an MCF after the aircraft has undergone certain maintenance while maintenance data does not call for such flight. Therefore, after the maintenance has been properly carried out, a certificate of release to service is issued and the aircraft airworthiness certificate remains valid for this flight.

(3) After troubleshooting of a system on the ground, an MCF is proposed by the maintenance personnel or organisation as confirmation that the solution applied has restored the normal system operation. During the maintenance performed, the maintenance instructions are followed for the complete restoration of the system and therefore a certificate of release to service is issued before the flight. The airworthiness certificate is valid for the flight. An open entry requesting this flight may be recorded in the aircraft technical log.

<sup>5</sup> Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council (OJ L 296, 25.10.2012, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1568896271265&uri=CELEX:32012R0965>).



(4) An aircraft system has been found to fail, the dispatch of the aircraft is not possible in accordance with the maintenance data, and the satisfactory diagnosis of the cause of the fault can only be made in flight. The process for this troubleshooting is not described in the maintenance data and therefore scenario (1) does not apply. Since the aircraft cannot fly under its airworthiness certificate because it has not been released to service after maintenance, a permit to fly issued in accordance with Regulation (EU) No 748/2012 is required.

After the flight and the corresponding maintenance work, the aircraft can be released to service and continue to operate under its original certificate of airworthiness.

For certain MCFs, the data obtained or verified in flight will be necessary for assessment or consideration after the flight by the maintenance personnel or organisation prior to issuing the maintenance release. For this purpose, when the maintenance staff cannot perform these functions in flight, it may rely on the crew performing the flight to complete this data or to make statements about in-flight verifications. In this case, the maintenance staff should appoint the crew personnel playing such a role on its behalf and, before the flight, brief them on their scope, functions and the detailed process to be followed.

## AMC1 ML.A.302 Aircraft maintenance programme

(a) The aircraft should only be maintained according to one maintenance programme at a given point in time. Where an owner wishes to change from one programme to another (e.g. from AMP based on MIP to AMP based on DAH data), certain additional maintenance may need to be carried out on the aircraft to implement this transition.

(b) The maintenance programme may take the format of the standard template provided in AMC2 ML.A.302 (EASA Form AMP). This maintenance programme may include several aircraft registrations as long as the maintenance requirements for each registration are clearly identified.

(c) During the annual review of the maintenance programme, the following should be taken into consideration:

- (1) the results of the maintenance performed during that year, which may reveal that the current maintenance programme is not adequate;
- (2) the results of the airworthiness review performed on the aircraft, which may reveal that the current maintenance programme is not adequate;
- (3) revisions introduced on the documents affecting the programme basis, such as the ML.A.302(d) minimum inspection programme (MIP) or the design approval holder (DAH) data; and
- (4) applicable mandatory requirements for compliance with Part 21, such as airworthiness directives (ADs), airworthiness limitations, certification maintenance requirements and specific maintenance requirements contained in the type certificate data sheet (TCDS).

When reviewing the effectiveness of the AMP, the airworthiness review staff (or the CAMO/CAO staff, if the review of the AMP is not performed in conjunction with an



airworthiness review) may need to review the maintenance carried out during the last 12 months, including unscheduled maintenance. To this end, he or she should receive the records of all the maintenance performed during that year from the owner/CAMO/CAO.

When reviewing the results of the maintenance performed during that year and the results of the airworthiness review, attention should be paid as to whether the defects found could have been prevented by introducing in the maintenance programme certain DAH's recommendations which were initially disregarded by the owner, CAMO or CAO.



## AMC2 ML.A.302 Aircraft maintenance programme

### EASA FORM AMP

The following EASA Form AMP may be used to produce the aircraft maintenance programme:

Part-ML aircraft maintenance programme (AMP)			
Aircraft identification			
1	Registration(s):	Type:	Serial no(s):
Basis for the maintenance programme			
2	Design approval holder (DAH) instructions for continued airworthiness (ICA) <input type="checkbox"/>	Minimum inspection programme (MIP) as detailed in the latest revision of AMC1 ML.A.302(d) <input type="checkbox"/> Other minimum inspection programme (MIP) complying with ML.A.302(d) <input type="checkbox"/> (List the tasks in Appendix A)	
Design Approval Holder (DAH)			
Instructions for Continuing Airworthiness (ICA)			
3	Equipment manufacturer and type	Applicable ICA reference (revision/date not required assuming the latest revision will always be used)	
For aircraft other than balloons			
3a	Aircraft (other than balloons)		
3b	Engine (if applicable)		
3c	Propeller (if applicable)		
For balloons			
3d	Envelope (only for balloons)		
3e	Basket(s) (only for balloons)		
3f	Burner(s) (only for balloons)		
3g	Fuel cylinders (only for balloons)		
Additional maintenance requirements to DAH ICA or to MIP (applicable to all AMPs)			
4	Indicate if any of the following types of repetitive maintenance are included in the AMP (when replying 'YES', list the specific requirements in Appendix B)	Yes	No
	Maintenance due to specific equipment and modifications		



	Maintenance due to repairs		
	Maintenance due to life-limited components (this should be only if the MIP is used. Otherwise, this data is already part of the DAH data used as a basis for the AMP.)		
	Maintenance due to mandatory continuing airworthiness information (airworthiness limitations (ALIs), certification maintenance requirements (CMRs), specific requirements in the TCDS, etc.)		
	Maintenance recommendations, such as time between overhaul (TBO) intervals, issued through service bulletins, service letter, and other non-mandatory service information		
	Maintenance due to repetitive ADs		
	Maintenance due to specific operational/airspace directives/requirements (altimeter, compass, transponder, etc.)		
	Maintenance due to type of operation or operational approvals		
	Other		
<b>Maintenance tasks alternative to the DAH ICA (not less restrictive than MIP)</b>			
5	Indicate if there is any maintenance task alternative to the DAH ICA (when 'YES', list the specific alternative maintenance tasks in Appendix C)	Yes	No
<b>Pilot-owner maintenance (only for balloons not operated under Subpart-ADD, or sailplanes not operated under Subpart-DEC, or other aircraft operated under Part-NCO)</b>			
Remark: pilot-owner maintenance is not allowed for aircraft operated by commercial ATO/DTO			
6	Does the pilot-owner perform pilot-owner maintenance (ref. ML.A.803)?  If yes, enter the name of the pilot-owner(s) authorised to perform such maintenance: Pilot-owner name: <u>(NOTE)</u> Licence number: <u>(NOTE)</u> Signature: _____ Date: _____ NOTE: It is possible to refer to a list in the case of jointly owned aircraft.	Yes	No
<b>Approval/declaration of the maintenance programme (select the appropriate option)</b>			
7	Declaration by the owner: <input type="checkbox"/>	Approval by the contracted CAMO/CAO: <input type="checkbox"/>	
	<i>'I hereby declare that this is the maintenance programme applicable to the aircraft referred to in block 1, and I am fully responsible for its content and, in particular, for any alternatives tasks to the Design Approval Holder's data.'</i>  Signature/name/date:	Approval reference no of the CAMO/CAO:  Signature/name/date:	
<b>Certification statement</b>			
8	<i>'I will ensure that the aircraft is maintained in accordance with this maintenance programme and that the maintenance programme will be reviewed and updated as required.'</i>  Signed by the person/organisation responsible for the continuing airworthiness of the aircraft according to ML.A.201:  Owner <input type="checkbox"/> — Lessee <input type="checkbox"/> — CAMO/CAO <input type="checkbox"/>		



	<p>Name of owner/lessee or CAMO/CAO approval number:</p> <p>Address:</p> <p>Telephone/fax:</p> <p>Email:</p> <p>Signature/date:</p>
9	<p>Appendices attached:</p> <ul style="list-style-type: none"> <li>— Appendix A YES <input type="checkbox"/> NO <input type="checkbox"/></li> <li>— Appendix B YES <input type="checkbox"/> NO <input type="checkbox"/></li> <li>— Appendix C YES <input type="checkbox"/> NO <input type="checkbox"/></li> <li>— Appendix D YES <input type="checkbox"/> NO <input type="checkbox"/></li> </ul>

<p style="text-align: center;"><b><u>Appendix A — Minimum inspection programme (MIP)</u></b></p> <p><b>(only applicable if a MIP different from the one described in AMC1 ML.A.302(d) is used — see Section 2 above)</b></p>		
<p><i>Detail the tasks and inspections contained in the minimum inspection programme (MIP) being used.</i></p>		
<p style="text-align: center;"><b><u>Appendix B — Additional maintenance requirements</u></b></p> <p><b>(include only if necessary — see Section 4 above)</b></p>		
<p><i>This appendix is supposed to include only the tasks which are included in the AMP, either at the recommended interval or at a different one.</i></p> <p><i>(All repetitive maintenance tasks not included here, or the interval differences should be kept by the CAMO/CAO (when contracted) in their files with their corresponding justifications. Appendix D may optionally be used. Nevertheless, the owner/CAMO/CAO is responsible for taking into account all instructions, even if they are not adopted and listed here. The person performing the airworthiness review is not responsible for the completeness of this appendix, but may do some sampling as part of the investigations and the findings discovered during the physical review).</i></p>		
<b>Task description</b>	<b>References</b>	<b>Interval</b> (tick box if the selected interval differs from that required in the referenced document)
<b>Maintenance due to specific equipment and modifications</b>		
		<input type="checkbox"/>
		<input type="checkbox"/>
<b>Maintenance due to repairs</b>		
		<input type="checkbox"/>
		<input type="checkbox"/>
<b>Maintenance due to life-limited components (This should be only if the MIP is used. Otherwise, this data is already part of the DAH data used as the basis for the AMP.)</b>		
		<input type="checkbox"/>



		<input type="checkbox"/>
<b>Maintenance due to mandatory continuing airworthiness instructions (ALIs, CMRs, specific requirements in the TCDS, etc.)</b>		
		<input type="checkbox"/>
		<input type="checkbox"/>
<b>Maintenance recommendations, such as time between overhaul (TBO) intervals, issued through service bulletins, service letter, and other non-mandatory service information</b>		
		<input type="checkbox"/>
Emergency locator transmitters and personal locator beacon — annual testing	EASA SIB 2019-09	1 Year <input type="checkbox"/>
(if not using MIP) Transponder test	EASA SIB 2011-15	2 Years <input type="checkbox"/>
		<input type="checkbox"/>
<b>Maintenance due to repetitive ADs</b>		
		<input type="checkbox"/>
		<input type="checkbox"/>
<b>Maintenance due to specific operational/airspace directives/requirements (altimeter, compass, transponder, etc.)</b>		
		<input type="checkbox"/>
		<input type="checkbox"/>
<b>Maintenance due to type of operation or operational approvals</b>		
		<input type="checkbox"/>
		<input type="checkbox"/>
<b>Other</b>		
		<input type="checkbox"/>
		<input type="checkbox"/>

**Appendix C — Maintenance tasks alternative to the DAH ICA (not less restrictive than MIP)**  
(include only if necessary — see Sections 5 above)

Task description	Recommended interval	Alternative inspection/task	Amended interval
<i>When the DAH ICA are used as the basis for the AMP, this appendix is supposed to include only the tasks alternatives to the DAH ICA, which are included in the AMP.</i>			
<i>(When a CAMO/CAO is contracted, all elements justifying the deviations to the DAH ICA should be kept by the CAMO/CAO and the organisation should provide a copy of these justifications to the owner)</i>			



**Appendix D — Additional information (optional)**

*This appendix may optionally be used to provide additional information, such as the complete list of AMP tasks or the list of documents (e.g. service bulletins) considered during the development of the AMP.*

EASA Form AMP, Issue 1

## **GM1 ML.A.302 Aircraft maintenance programme**

The responsibilities associated with maintenance programmes developed in accordance with ML.A.302 are the following:

- (a) If the owner has contracted a CAMO or CAO in order to manage the continuing airworthiness of the aircraft, this organisation is responsible for developing and approving a maintenance programme which:
  - (1) indicates whether this programme is based on data from the DAH or on the MIP described in ML.A.302(d);
  - (2) identifies the owner and the specific aircraft, engine, and propeller (as applicable);
  - (3) includes all mandatory maintenance information and any additional tasks derived from the assessment of the DAH's instructions;
  - (4) justifies any deviations from the DAH's instructions; when the DAH instructions are the basis for the AMP development, these deviations should not fall below the requirements of the MIP; and
  - (5) is customised to the particular aircraft type, configuration and operation, in accordance with ML.A.302(c)(5).
- (b) If the owner has not contracted a CAMO or CAO in order to manage the continuing airworthiness of the aircraft, then the owner is responsible for developing and declaring the maintenance programme, assuming full responsibility for its content and for any deviations from the DAH's instructions (ref. ML.A.201(f) and ML.A.302(c)(7)). In this case, these deviations do not need to be justified. However, the maintenance programme still needs to comply with the requirements contained in ML.A.302(c), in particular with the obligation to not fall below the requirements of the MIP and to comply with the mandatory continuing airworthiness information.
- (c) The content of the owner-declared maintenance programme cannot be challenged up front either by the competent authority or by the contracted maintenance organisation. This declared maintenance programme is the basis for adequate planning of maintenance, as well as for the airworthiness reviews and the content of the aircraft continuing airworthiness monitoring (ACAM) inspections in accordance with ML.B.303. Nevertheless, the maintenance programme will be subject to periodic reviews at the occasion of the airworthiness review and, in case of discrepancies, linked with deficiencies in the content of the maintenance programme,



the owner shall amend the maintenance programme accordingly, as required by ML.A.302(c)(9).

- (d) When the competent authority is notified of deficiencies linked with the content of the declared maintenance programme for a particular aircraft (in case no agreement is reached between the owner and the airworthiness review staff about the changes required in the maintenance programme), the competent authority should contact the owner, request a copy of the maintenance programme, decide which amendment to the AMP is necessary and raise the associated finding (ref. ML.A.302(c)(9)). If necessary, the competent authority may also react in accordance with ML.B.304. Based on the information received, the reported deficiencies and the identified risks, the competent authority may in addition adapt the ACAM programme accordingly (ref. ML.B.303).
- (e) Although there is no requirement for the owner to send a copy of the maintenance programme to the competent authority, this does not prevent the competent authority from requesting at any time the owner to send information about, or a copy of the AMP, even if deficiencies have not been reported (see AMC1 ML.B.201).
- (f) Since the maintenance programme has to identify the alternatives tasks to the DAH's instructions, the airworthiness reviews and ACAM inspections should place emphasis on the inspection of the areas affected by those deviations in order to make sure that the maintenance programme is effective.
- (g) Since the competent authority is not responsible for the content of a declared maintenance programme, the competent authority does not authorise the accomplishment of the scheduled maintenance to deviate from the AMP content (other than the tolerances provided for in ML.A.302(d)(1)). In such cases, the owner may declare an amended AMP.

## GM2 ML.A.302 Aircraft maintenance programme

The following table provides a summary of the provisions contained in ML.A.302 in relation to the content of the maintenance programme, its approval and its link with the airworthiness review:

	OPTION 1	OPTION 2
<b>Responsibility for developing the AMP</b>	Contracted CAMO or CAO	Owner (if allowed under ML.A.201(f))
<b>Approval/declaration of the maintenance programme</b>	Approved by the CAMO or CAO, or none required in case of compliance with ML.A.302(e)	Declaration by the owner or none required in case of compliance with ML.A.302(e)
<b>Basis for the maintenance programme</b>	ICA issued by the DAH or MIP (not applicable to rotorcraft and airships)	
<b>Deviations from the DAH's ICA</b>	Deviations from the DAH's instructions are justified. The CAMO/CAO keeps a record of the justifications and provide a copy of them to the owner.	Deviations do not need to be justified.
<b>AMP annual review</b>	In conjunction with the airworthiness review, by the airworthiness review staff or, if not performed in conjunction with the airworthiness review (e.g. in case of ARC extension), by the CAMO or CAO.	



## AMC1 ML.A.302(c) Aircraft maintenance programme

When evaluating an alternative to a maintenance task issued or recommended by DAH, such as the extension of time between overhaul (TBO) intervals, a risk-based approach should be taken, considering aspects such as the operation of aircraft, type of aircraft, hours/years in service, maintenance of the aircraft, compensating measures, redundancy of components, etc.

The following table provides more details of aspects that should be considered:

	Examples
<b>OPS approval</b>	HIGHER RISK: commercial air transport (CAT), commercial flight training MEDIUM RISK: flight training by an association, specialised operations (SPO) LOWER RISK: private
<b>Flight rules</b>	HIGHER RISK: instrument flight rules (IFR) MEDIUM RISK: visual flight rules (VFR) at night LOWER RISK: VFR by day
<b>Aircraft weight</b>	HIGHER RISK: ELA2 aircraft MEDIUM RISK: ELA1 aircraft LOWER RISK: light sport aeroplanes (LSA), very light aircraft (VLA), sailplanes and powered sailplanes
<b>Who manages the airworthiness of the aircraft?</b>	HIGHER RISK: owner LOWER RISK: CAMO/CAO
<b>Who maintains the aircraft?</b>	HIGHER RISK: pilot-owner MEDIUM RISK: independent certifying staff LOWER RISK: maintenance organisation
<b>General physical aspect (aircraft, engine, etc.)</b>	HIGHER RISK: negative impression MEDIUM RISK: neutral impression LOWER RISK: positive impression
<b>Time in service (flight hours, years)</b>	HIGHER RISK: very high number of hours/years MEDIUM RISK: medium number of hours/years LOWER RISK: low number of hours/years



	Examples
<b>Aircraft utilisation</b>	HIGHER RISK: less than 50 h per year MEDIUM RISK: around 200 h per year LOWER RISK: more than 400 h per year
<b>Reported occurrences</b>	HIGHER RISK: frequent occurrences, numerous findings in ACAM or ramp inspections. MEDIUM RISK: rare occurrences, few findings in ACAM inspections LOWER RISK: no occurrences, rare findings in ACAM inspections
<b>System redundancy (for components such as engine/propeller)</b>	HIGHER RISK: single-engined aircraft LOWER RISK: multi-engined aircraft
<b>Compensating maintenance measures</b>	HIGHER RISK: no supplementary measures LOWER RISK: supplementary measures (oil analysis, boroscope inspections, corrosion inspections, etc.)
<b>Risk factor of the component failure</b>	HIGHER RISK: engine failure on a helicopter MEDIUM RISK: engine failure on an aeroplane LOWER RISK: engine failure on an LSA, VLA, sailplane, or powered sailplane

The above information may be useful for CAMOs and CAOs when developing and approving maintenance programmes, and for the airworthiness review staff performing airworthiness reviews and reviewing the effectiveness of the declared maintenance programme. It may also be useful for the owner in order to take an informed decision before introducing deviations from the DAH's recommendations. Nevertheless, as allowed by ML.A.302(c)(7) and explained in GM ML.A.302, when the owner issues a declaration for the maintenance programme, they do not need to justify such deviations.

The repetitive maintenance due to specific recommendations in service bulletins, service letters, etc. as shown in the EASA Form AMP should include only the tasks which are going to be performed, either at the recommended interval or at a different one. All other recommendations that are not included in the AMP after being evaluated can be kept by the CAMO in their files with their corresponding justifications. Nevertheless, the owner/CAMO is responsible for taking into account all recommendations, even if they are not listed in this specific field of the EASA Form AMP. The person performing the airworthiness review is not responsible for the completeness of this Section, but may do some sampling as part of the investigations and the findings discovered during the physical review.



## GM1 ML.A.302(c)(2)(b) Aircraft maintenance programme

Design approval holder (DAH) refers to the holder of a type certificate (TC), restricted type certificate, supplemental type certificate (STC), European Technical Standard Order (ETSO) authorisation, repair or change to the type design.

The 'instructions for continuing airworthiness (ICA) issued by the design approval holder (DAH)' do not include the data issued by other original equipment manufacturer (OEM), except when the DAH ICA makes clear reference to such OEM data.

Tasks or intervals (e.g. escalations) alternative to those of the DAH ICA and selected by the CAMO or CAO for the AMP do not need to be approved by the competent authority. Justification of these deviations are to be kept by the CAMO or CAO.

## GM1 ML.A.302(c)(3) Aircraft maintenance programme

### ALTERNATIVE MAINTENANCE ACTIONS

'Alternative maintenance actions to those referred to in point (c)(2)(b)' refer to when the DAH ICA are used as the basis for the AMP development and the CAMO, CAO or owner (as applicable), when developing the AMP, decides to deviate from certain of these DAH instructions, introducing, for example, a less frequent interval or a different task type (inspection instead of check) than the one established by the ICA.

These alternative maintenance actions shall not be less restrictive than those set out in the applicable MIP. This means that the extent of the maintenance to be covered by the deviating task cannot be less than the extent of the corresponding task in the MIP in terms of frequency and task type.

Examples of alternative maintenance actions:

ICA task	AMP proposed alternative	MIP task	Alternative acceptable Yes/No
Inspection XX	Inspection XX	Inspection XX	Yes
6 months interval	12 months interval	12 months interval	
Inspection XX	Inspection XX	Inspection XX	No
12 months interval	24 months interval	12 months interval	
Inspection XX	Inspection XX	Inspection XX	No
24 months interval	36 months interval	12 months interval	(24 months to be kept)
Functional test system XX	Operational test system XX (same interval) or general visual inspection system XX (same interval)	Functional test system XX (same interval)	No*



ICA task	AMP proposed alternative	MIP task	Alternative acceptable Yes/No
Operational test system XX	Functional test system XX (same interval)	Operational test system XX (same interval)	Yes*
Inspection XX 24 months interval	Inspection XX 36 months	None relevant	Yes
Functional test	General visual inspection	None relevant	Yes

\*Functional test considered more restrictive than operational test

Remark: the above does not apply to one-time interval extensions, for which ML.A.302(d)(1) provides 1 month or 10 h tolerance (i.e. permitted variation) for aeroplanes, touring motor gliders (TMGs) and balloons and 1 month tolerance for sailplanes and powered sailplanes other than TMGs.

## GM1 ML.A.302(c)(4) Aircraft maintenance programme

### MANDATORY CONTINUING AIRWORTHINESS INFORMATION

‘Mandatory continuing airworthiness information’ other than ADs may be different from one aircraft to another, depending on the type certification basis used. The aircraft may have been certified before the term ‘ALS (Airworthiness Limitations Section)’ was introduced in the certification specification (or airworthiness code). However, the intent is that the AMP (whether based on MIP or not) includes all mandatory scheduled maintenance requirements identified during initial airworthiness activity, by the TC holder, STC holder and, if applicable, engine TC holder. These requirements may be identified under a variety of designations such as:

- Airworthiness limitations or Airworthiness limitation items (ALI)
- Certifications maintenance requirements (CMR)
- Safe life items or safe life limits or safe life limitations
- Life-limited parts (LLP)
- Time limits
- Retirements life
- Mandatory Inspections or Mandatory airworthiness Inspections
- Fuel airworthiness limitations or Fuel tank safety limitations
- Ageing systems maintenance

In case of doubt, it is advised to check the TCDS or contact the DAH.

The intervals of the mandatory continuing airworthiness information cannot be extended by a CAMO/CAO. The escalation of such tasks is approved by the Agency.



## AMC1 ML.A.302(d) Aircraft maintenance programme

This AMC contains an acceptable MIP for aeroplanes of 2 730 kg maximum take-off mass (MTOM) and below, and for ELA2 aircraft other than airships, grouped in the following categories:

- aeroplanes of 2 730 kg MTOM and below;
- ELA2 sailplanes and ELA2 powered sailplanes; and
- ELA2 balloons.

These MIPs already comply with the requirements of ML.A.302(d) and may be used in order to define the basic information for the maintenance programme as required by ML.A.302(c)(2)(a). However, the maintenance programme must be customised as required by ML.A.302(c)(5), which may be achieved by using the standard template contained in AMC ML.A.302.

It should be noted that using the 1-month tolerance permitted by ML.A.302(d)(1) for the annual inspection may result in an expired airworthiness review certificate (ARC).

### MIP for aeroplanes of 2 730 kg MTOM and below

To be performed at every annual/100-h interval, whichever comes first.

A tolerance of 1 month or 10 h may be applied. The next interval shall be calculated from the time the inspection takes place.

Note 1: Use the manufacturer's maintenance manual to accomplish each task/inspection.

Note 2: Proper operation of backup or secondary systems and components should be performed wherever a check for improper installation/operation is carried out.

Aeroplanes of 2 730 kg MTOM and below	
System/component/area	Task and inspection detail
<b>GENERAL</b>	
General	Remove or open all necessary inspection plates, access doors, fairings, and cowlings. Clean the aircraft and aircraft engine as required.
Lubrication/servicing	Lubricate and replenish fluids in accordance with the manufacturer's requirements.
Markings	Check that side and underwing registration markings are correct. If applicable, check that an exemption for alternate display is approved. Identification plate for national aviation authority (NAA)-registered aircraft is present, as well as other identification markings on fuselage in accordance with local (national) rules.
Weighing	Review weighing record to establish accuracy against installed equipment. Weigh the aircraft as required by Part-NCO or Part-SPO, as applicable.
Service life limits	Check the records that the service life limits and airworthiness limits are within the life time limits of the maintenance programme.



Software	Check for updated software/firmware status and databases for engine and equipment.
<b>AIRFRAME</b>	
Fabric and skin	Inspect for deterioration, distortion, other evidence of failure, and defective or insecure attachment of fittings. NOTE: When checking composite structures, check for signs of impact or pressure damage that may indicate underlying damage.
Fuselage structure	Check frames, formers, tubular structure, braces, and attachments. Inspect for signs of corrosion and cracks.
Systems and components	Inspect for improper installation, apparent defects, and unsatisfactory operation.
Pitot-static system	Inspect for security, damage, cleanliness, and condition. Drain any water from condensation drains.
General	Inspect for lack of cleanliness and loose equipment that may foul the controls.
Tow hooks	Inspect for condition of moving parts and wear. Check service life. Carry out operational test.
<b>CABIN AND COCKPIT</b>	
Seats, safety belts and harnesses	Inspect for poor condition and apparent defects. Check for service life.
Windows, canopies and windshields	Inspect for deterioration and damage, and for function of emergency jettison.
Instrument panel assemblies	Inspect for poor condition, mounting, marking, and (where practicable) improper operation. Check markings of instruments in accordance with the flight manual.
Flight and engine controls	Inspect for improper installation and improper operation.
Speed/weight/manoeuvre placard	Check that the placard is correct and legible, and accurately reflects the status of the aircraft.
All systems	Inspect for improper installation, poor general condition, apparent and obvious defects, and insecurity of attachment.
<b>LANDING GEAR</b>	
Shock-absorbing devices	Inspect for improper oleo fluid level. Inspect for wear and deformation of rubber pads, bungees, and springs.
All units	Inspect for poor condition and insecurity of attachment, including the related structure.
Retracting and locking mechanism	Inspect mechanism. Operational check.
Linkages, trusses and members	Inspect for undue or excessive wear fatigue and distortion.
Steering	Inspect the nose/tail wheel steering for proper function and wear.
Hydraulic lines	Inspect for leakage. Check condition and replace if necessary.
Electrical system	Inspect for chafing. Operational check of switches.



Wheels	Inspect for cracks, defects, and condition of bearings.
Tires	Inspect for wear and cuts.
Brakes	Inspect for improper adjustment and wear. Carry out operational test.
Floats and skis	Inspect for insecure attachment and apparent defects.
<b>WING AND CENTRE SECTION</b>	
All components	Inspect all components of the wing and centre section assembly for poor general condition, fabric or skin deterioration, distortion, evidence of failure and insecurity of attachment.
Connections	Inspect main connections (e.g. between wings, fuselage, wing tips) for proper fit, play within tolerances, wear or corrosion on bolts and bushings.
<b>FLIGHT CONTROLS</b>	
Control circuit/stops	Inspect control rods and cables. Check that the control primary stops are secure and make contact.
Control surfaces	Inspect aileron, flap, elevator, air brake and rudder assemblies, hinges, control connections, springs/bungees, tapes and seals. Check full range of motion and free play.
Trim systems	Inspect trim surfaces, controls, and connections. Check full range of motion.
<b>EMPENNAGE</b>	
All components and systems	Inspect all components and systems that make up the complete empennage assembly for poor general condition, fabric or skin deterioration, distortion, evidence of failure, insecure attachment, improper component installation, and improper component operation.
<b>AVIONICS AND ELECTRICS</b>	
Batteries	Inspect for improper installation, improper charge, spillage and corrosion.
Radio and electronic equipment	Inspect for improper installation and insecure mounting. Carry out ground function test.
Wiring and conduits	Inspect for improper routing, insecure mounting, and obvious defects.
Bonding and shielding	Inspect for improper installation, poor condition, chafing and wear of insulation.
Antennas	Inspect for poor condition, insecure mounting, and improper operation.
Lights	Operational check of the interior, exterior and instrument lightning
<b>POWER PLANT (OTHER THAN TURBOPROP ENGINE)</b>	
Engine section	Inspect for visual evidence of oil, fuel or hydraulic leaks and sources of such leaks.
Studs and nuts	Inspect for looseness, signs of rotation and obvious defects.
Internal engine	Inspect for proper cylinder compression (record measures for each cylinder) and for metal particles or foreign matter in oil filter, screens and sump drain plugs.



Engine mounts	Inspect for cracks, looseness of mounting, and looseness of the engine to the engine-mount attachment.
Flexible vibration dampeners	Inspect for poor condition and deterioration.
Engine controls	Inspect for defects, improper travel, and improper safe tying.
Lines, hoses and clamps	Inspect for leaks, improper condition, and looseness.
Exhaust stacks	Inspect for cracks, defects, and improper attachment.
Turbocharger and intercooler	Inspect for leaks, improper condition, and looseness of connections and fittings. Check MP controller or density controller for leakage and free movement of controls. Check waste gate or overpressure relief valve for free movements.
Heating	Inspect cabin heating heat exchanger for improper condition and function. For exhaust heat exchanger, check CO-Carbon monoxide concentration.
Liquid cooling systems	Inspect for leaks and proper fluid level.
Electronic engine control	Inspect for signs of chafing, and proper electronics and sensor installation.
Accessories	Inspect for apparent defects in security of mounting.
All systems	Inspect for improper installation, poor general condition, defects and insecure attachment.
Cowling	Inspect for cracks and defects. Check cowling flaps.
Cooling baffles and seals	Inspect for defects, improper attachment, and wear.

**TURBOPROP ENGINE**

Incoming power check	Perform in accordance with the graphs found in the engine maintenance manual (EMM).
Inertial separator	Functional check
Engine cowling	Remove, inspect for damage.
General condition	Inspect for oil, fuel, bleed-air or other leaks.
1st stage compressor blades	Remove screen, check for foreign object debris (FOD) or other damage.
P <sub>3</sub> filter	Replace
Oil filter	Inspection and cleaning
Fuel low pressure filter	Replace
Fuel high pressure filter	Inspection and cleaning
Oil scavenge filter	Inspection and cleaning
Chip detector	Inspection and cleaning
Exhaust duct	Inspection
Starter/generator brushes	Inspection for proper length



Ignitor/glow plugs	Functional check
Overspeed governor	Inspect for oil leaks.
Governor and beta-valve	Inspect for oil leaks or binding of controls.
Propeller	Inspect blades for damage and hub leaks.
(if installed) fire detector loop or sense module	Functional check
Engine cowling	Install
Power check	Perform in accordance with the graphs found in the EMM, record values.
Oil level	Check within 10 minutes after shutdown.
<b>FUEL</b>	
Fuel tanks	Inspect for leaks and improper installation and connection. Verify proper sealing and function of tank drains.
<b>CLUTCHES AND GEARBOXES</b>	
Filters, screens, and chip detectors	Inspect for metal particles and foreign matter.
Exterior	Inspect for oil leaks.
Output shaft	Inspect for excessive bearings' play and condition.
<b>PROPELLER</b>	
Propeller assembly	Inspect for cracks, nicks, binds, and oil leakage.
Propeller bolts	Inspect for proper installation, looseness, signs of rotation, and lack of safe tying.
Propeller control mechanism	Inspect for improper operation, insecure mounting, and restricted travel.
Anti-icing devices	Inspect for improper operation and obvious defects.
<b>MISCELLANEOUS</b>	
Ballistic rescue system	Inspect for proper installation, unbroken activation mechanism, proper securing while on ground, validity of inspection periods of pyrotechnic devices, and parachute-packing intervals.
Other miscellaneous items	Inspect installed miscellaneous items that are not otherwise covered by this listing for improper installation and improper operation.
<b>OPERATIONAL CHECKS</b>	
Power and revolutions per minute (rpm)	Check that power output, static and idle rpm are within published limits.
Magneton	Check for normal function.
Fuel and oil pressure	Check that they are within normal values. Check fuel pumps for proper operation.
Engine temperatures	Check that they are within normal values.



Engine	For engines equipped with automated engine control (e.g. FADEC), perform the published run-up procedure and check for discrepancies.
Engine	For dry-sump engines, engines with turbochargers and liquid-cooled engines, check for signs of disturbed fluid circulation.
Pitot-static system	Perform operational check.
Transponder	Perform operational check.
Ice protection	Perform operational check of ice protection system.
Fuel quantity indication	Check the fuel quantity indication for proper indication.
Caution and warning	Operational check of cautions and warnings lights



### MIP for ELA2 sailplanes and ELA2 powered sailplanes

To be performed:

- every 100-h/annual interval (for TMGs), whichever comes first; or
- every annual interval (for the rest).

A tolerance of 1 month or 10 h, as applicable, may be applied. The next interval shall be calculated from the time the inspection takes place.

Note 1: Use the manufacturer's maintenance manual to accomplish each task/inspection.

Note 2: In the case of TMGs, it is acceptable to control the hours of use of the aircraft, engine and propeller as separate entities. Any maintenance check to be carried out between two consecutive 100-h/annual inspections may be performed separately on the aircraft, engine and propeller, depending on when each element reaches the corresponding hours. However, at the time of the 100-h/annual, all the elements must be covered.

Note 3: Proper operation of backup or secondary systems and components should be carried out wherever a check for improper installation/operation is performed.

ELA2 sailplanes and ELA2 powered sailplanes	
System/component/area	Task and inspection detail
<b>GENERAL</b>	
General — all tasks	The aircraft must be clean prior to inspection. Inspect for security, damage, wear, integrity, whether drain/vent holes are clear, for signs of overheating, leaks, chafing, cleanliness and condition, as appropriate to the particular task. Whilst checking composite structures, check for signs of impact or pressure damage that may indicate underlying damage.
Lubrication/servicing	Lubricate and replenish fluids in accordance with the manufacturer's requirements.
Markings	Check that side and underwing registration markings are correct. If applicable, check that an exemption for alternate display is approved, if identification plate for NAA-registered aircraft is present, and if other identification markings on fuselage are in accordance with local (national) rules.
Weighing	Review weighing record to establish accuracy against installed equipment. Weigh the aircraft as required by the relevant regulation for air operation.
<b>AIRFRAME</b>	
Fuselage paint/gel coat	Inspect external surface and fairings, gel coat, fabric covering or metal skin, and paintwork.
Fuselage structure	Check frames, formers, tubular structure, skin, and attachments. Inspect for signs of corrosion on tubular framework.
Nose fairing	Inspect for evidence of impact with ground or objects.



Release hook(s)	Inspect nose and centre of gravity, release hooks and controls. Check operational life. Carry out operational test. If more than one release hook or control is fitted, check operation of all release hooks from all positions.
Pitot/ventilator	Check alignment of probe, check operation of ventilator.
Pitot-static system	Inspect pitot probes, static ports, and all tubing (as accessible) for security, damage, cleanliness, and condition. Drain any water from condensate drains.
Bonding/vents drains	Check all bonding leads and straps. Check that all vents and drains are clear from debris.
<b>CABIN AND COCKPIT</b>	
Cleanliness/loose articles	Check under cockpit floor/seat pan and in rear fuselage for debris and foreign items.
Canopy, locks and jettison	Inspect canopy, canopy frame and transparencies for cracks, unacceptable distortion, and discolouration. Check operation of all locks and catches. Carry out an operational test of the canopy jettison system from all positions.
Seat/cockpit floor	Inspect seat(s). Check that all loose cushions are correctly installed and, as appropriate, that energy-absorbing foam cushions are fitted correctly. Ensure that all seat adjusters fit and lock correctly.
Harness(es)	Inspect all harnesses for condition, and wear of all fastenings, webbing, and fittings. Check operation of release and adjustments.
Rudder pedal assemblies	Inspect rudder pedal assemblies and adjusters. Inspect cables for wear and damage.
Instrument panel assemblies	Inspect instrument panel and all instruments/equipment. Check if instrument readings are consistent with ambient conditions. Check marking of all switches, circuit breakers, and fuses. Check operation of all installed equipment, as possible in accordance with the manufacturer's instructions. Check markings of instruments in accordance with the aircraft flight manual (AFM).
Oxygen system	Inspect oxygen system. Check bottle hydrostatic-test date expiry in accordance with the manufacturer's recommendations. Ensure that oxygen installation is recorded on weight and centre-of-gravity schedule. <b>CAUTION: OBSERVE ALL SAFETY PRECAUTIONS.</b>
Colour-coding of controls	Ensure that controls are colour-coded in accordance with the AFM and in good condition.
Placards	Check that the placards are correct and legible, and accurately reflect the status of the aircraft in accordance with the AFM.
<b>LANDING GEAR</b>	
Front skid/nose wheel and mounts	Inspect for evidence of hard/heavy landings. Check skid wear. Inspect wheel, tyre, and wheel box. Check tyre pressure.
Main wheel and brake assembly	Check for integrity of hydraulic seals and leaks in pipework. Check life of hydraulic hoses and components, if specified by the manufacturer. Remove brake drums, check brake lining wear. Check disk/drum wear. Refit drum. Check brake adjustment. <b>CAUTION: BRAKE DUST MAY CONTAIN ASBESTOS.</b> Check operation of brake. Check level of brake fluid and replenish, if necessary. Check tyre pressure. <b>CAUTION: CHECK TYPE OF BRAKE FLUID USED AND OBSERVE SAFETY PRECAUTIONS.</b>



Undercarriage suspension	Check springs, bungees, shock absorbers, and attachments. Check for signs of damage. Service strut, if applicable.
Undercarriage retract system and doors	Check retraction mechanism and controls, warning system if fitted, gas struts, doors and linkages/springs, over-centre/locking device. Perform retraction test.
Tail skid/wheel	Inspect for evidence of hard/heavy landings. Check skid wear. Inspect wheel, tyre, and wheel box. Check bond of bonded skids. Check tyre pressure.
Wheel brake control circuit	Inspect wheel brake control rods/cables. If combined with air brake, ensure correct rigging relationship. Check parking-brake operation, if fitted.
<b>WING AND CENTRE SECTION</b>	
Centre section	Inspect wing centre section including fairings for security, damage, and condition.
Wing attachments	Inspect the structural attachments of the wing. Check for damage, wear, and security. Check for rigging damage. Check condition of wing attachment pins and wing main bolts.
Winglet/wing extensions	Inspect the structural attachments of winglet and wing attachments. Check for damage, wear, and security.
Aileron control circuit/stops	Inspect aileron control rods/cables. Check that control stops are secure and make contact. Inspect connecting control devices for security, damage, free play and secure mounting.
Air brake control circuit	Inspect air brake control rods/cables. Check friction/locking device (if fitted). Inspect connecting control devices for security, damage, free play and secure mounting. Inspect air brake locking for proper adjustment and positive locking.
Wing struts/wires	Inspect struts for damage and internal corrosion. Re-inhibit struts internally every 3 years or in accordance with the manufacturer's instructions.
Wings including underside registration markings	Check mainplane structure externally and internally, as far as possible. Check gel coat, fabric covering, or metal skin.
Ailerons and controls	Inspect aileron and flaperon assemblies, hinges, control connections, springs/bungees, tapes, and seals. Ensure that seals do not impair the full range of movement.
Air brakes/spoilers	Inspect air brake/spoiler panel(s) operating rods, closure springs, and friction devices, as fitted.
Flaps	Check flap system and control. Inspect connecting control devices.
Control deflections and free play, and record them on worksheets	Check and record range of movements and cable tensions, if specified, and check free play.
<b>EMPENNAGE</b>	
Tailplane and elevator	With tailplane de-rigged, check tailplane and attachments, self-connecting and manual control connections. Check gel coat, fabric covering, or metal skin.
Rudder	Check rudder assembly, hinges, attachments, balance weights.
Rudder control circuit/stops	Inspect rudder control rods/cables. Check that control stops are secure and make contact. Pay particular attention to wear and security of liners and cables in 'S' tubes.



Elevator control circuit/stops	Inspect elevator control rods/cables. Check that control stops are secure and make contact. Inspect self-connecting control devices.
Trimmer control circuit	Inspect trimmer control rods/cables. Check friction/locking device. Inspect trim indication for proper adjustment and function.
Control deflections and free play, and record them on worksheets	Check and record range of movements and cable tensions, if specified, and check free play.
<b>AVIONICS AND ELECTRICS</b>	
Electrical installation/fuses	Check all electrical wiring for condition. Check for signs of overheating and poor connections. Check fuses/trips for condition and correct rating.
Battery security and corrosion	Check battery mounting for security and operation of clamp. Check for evidence of electrolyte spillage and corrosion. Check that battery has correct main fuse fitted. It is recommended to carry out battery capacity test on gliders equipped with radio, used for cross-country, controlled airspace, or competition flying.
Radio installations and placards	Check radio installation, microphones, speakers and intercom, if fitted. Check that a call sign placard is installed. Carry out ground function test. Record radio type fitted.
Air speed indicator	Carry out a pitot static leak check and functional check of the airspeed indicator. In case of indications of malfunctions, carry out an airspeed indicator calibration check.
Altimeter datum	Check barometric subscale by altimeter QNH reading.
Pitot-static system	Perform pitot static leak check, inspect hoses for condition, operational check.
Transponder	Perform operational check.
<b>MISCELLANEOUS</b>	
Removable ballast	Check removable ballast mountings and securing devices (including fin ballast, if applicable) for condition. Check that ballast weights are painted with conspicuous colour. Check that provision for the ballast is made on the loading placard.
Drag chute and controls	Inspect chute, packing and release mechanism. Check packing intervals.
Water ballast system	Check water ballast system, wing and tail tanks, as fitted. Check filling points, level indicators, vents, dump and frost drains for operation and leakage. If loose bladders are used, check for leakage and expiry date, as applicable.
<b>POWER PLANT (when applicable)</b>	
NOTE: In the case of sailplanes with electrical or jet engines, follow the maintenance instructions and recommendations of the DAH.	
Engine pylons and mountings	Inspect engine and pylon installation. Check engine compartment and fire sealing.
Gas strut	Check gas strut.
Pylon/engine stops	Check limit stops on retractable pylons. Check restraint cables.
Electric actuator	Inspect electric actuator, motor, spindle drive, and mountings.
Electrical wiring	Inspect all electrical wiring. Pay special attention to wiring that is subject to bending during extension and retraction of engine/pylon.



Limit switches	Check operation of all limit switches and strike plates. Make sure that they are not damaged by impact.
Fuel tank(s)	Check fuel tank mountings and tank integrity. Check fuel quantity indication system, if fitted.
Fuel pipes and vents	Check all fuel pipes, especially those subject to bending during extension and retraction of engine/pylon. Check that vents are clear. Make sure that overboard drains do not drain into engine compartment. Check self-sealing.
Fuel cock or shut-off valve	Check operation of fuel cock or shut-off valve and indications.
Fuel pumps and filters	Clean or replace filters, as recommended by manufacturer. Check operation of fuel pumps for engine supply or tank replenishment. Check fuel pump controls and indications.
Decompression valve	Inspect decompression valve and operating control.
Ignition	Inspect Ignition system including spark plugs, distributor and cables for condition and damage. Inspect low-tension and high-tension wiring, connectors, spark plug caps. Check magneto-to-engine timing.
Propeller	Inspect propeller, hub, folding mechanism, brake, pitch change mechanism, stow sensors. Inspect propeller control for function and condition.
Doors	Check engine compartment doors, operating cables, rods, and cams.
Safety springs	Check all safety and counterbalance springs.
Extension and retraction	Check that extension and retraction operation times are within the limits specified by the manufacturer. Check light indications and interlocks for correct operation.
Exhaust	Inspect exhaust system, silencer, shock mounts, and links.
Engine installation	Inspect engine and all accessories. Carry out compression test and record results (for piston engines). Compression test results: No 1 (left/front); and No 2 (right/rear).
Lubrication	Change engine oil and filter. Replenish oil and additive tanks.
Engine instruments	Inspect all engine instruments and controls. Check control unit, mounts, bonding and connections. Carry out internal self-test, if fitted.
Engine battery	If separate from airframe battery, inspect battery and mountings. If main fuse is fitted, check rating and condition.
Engine battery capacity test	Carry out capacity test. Refer to appropriate manual or guidance.
Placards	Check that all placards are in accordance with the AFM and legible.
Oil and fuel leaks	With the engine fully serviced, check the fuel and oil system for leaks.



### MIP for ELA2 hot-air balloons

To be performed at every 100-h/annual interval, whichever comes first.

A tolerance of 1 month or 10 h may be applied. The next interval shall be calculated from the time the inspection takes place.

Note 1: Use the manufacturer's maintenance manual to accomplish each task/inspection.

Note 2: Proper operation of backup or secondary systems and components should be carried out wherever a check for improper installation/operation is performed.

#### (a) Envelope

System/component/area	Task and inspection detail
Identification (type/serial number/registration plate)	Check for presence.
Crown ring	Inspect for damage/corrosion.
Crown line	Inspect for damage, wear, security of attachment. Check correct length.
Vertical/Horizontal-load tapes	Inspect joints with the crown ring, top of the envelope and wires. Inspect that all load tapes are undamaged along their entire length. Inspect base horizontal tape and edge of the envelope top. Inspect joint between base horizontal-load tape and vertical-load tapes.
Envelope fabric	Inspect the envelope fabric panels (including parachute and rotation vents, if fitted) for damage, porosity overheating or weakness. Unrepaired damage is within tolerance provided for by the manufacturer. If substantial fabric porosity is suspected, a flight test should be performed, but only after a grab test has demonstrated that the balloon is safe to fly. Perform grab test in accordance with the manufacturer's instructions.
Flying cables	Inspect for damage (particularly heat damage).
Karabiners	Inspect for damage/corrosion. Operational check of karabiner lock.
Melting link and 'tempilabel'	Check and record maximum temperature indication (flag/tempilabel).
Control lines and attachments	Inspect for damage wear, security of knots. Check proper length. Check lines attachments for damage, wear, security.
Envelope pulleys/guide rings	Inspect for damage, wear, free running, contamination, security of attachment.

#### (b) Burner

System/component/area	Task and inspection detail
Identification (type/serial number)	Check for presence and verify type/serial number installed.
Burner frame	Inspect welds for cracking.
	Inspect tubes for distortion/deformation/cuts/gouges.
	Inspect frame for security of fasteners (heat shields, flexi-corners).
	Inspect frame lugs for wear and cracking.
	Inspect general condition (corrosion, heat shields).
Gimballing	Operational check of stiffness and security of fasteners.
Leak check	Perform leak check of the burner.
Fuel hoses including manifolds	Inspect all hoses for wear, damage, leakage and service life limitations. Inspect O-ring seals, lubricate/replace as required.
Pressure gauges	Check the pressure gauge reads correctly, and that lens is present.



Pilot valves/flame	Check shut-off, free movement, correct function, and lubricate if necessary.
Whisper valves/flame	Check shut-off, free movement, correct function, and lubricate if necessary.
Main valves/flame	Check shut-off, free movement, correct function, and lubricate if necessary.
Coils	Check for damage, distortion, security of fasteners. Inspect welds for cracking. Check security of jets. Tighten or replace, as necessary.

### (c) Basket

System/component/area	Task and inspection detail
Identification (type/serial number)	Check for presence.
Basket walls	Check the general condition of the basket walls. Inspect weave for damage, cracks/holes. Check for no sharp objects inside the basket.
Basket wires	Inspect for damage, check swaging and eye rings (thimbles).
Karabiners	Inspect for damage/corrosion. Operational check of karabiner lock.
Basket floor	Inspect for damage and cracks.
Runners	Inspect for damage, security of attachment.
Rawhide	Inspect for damage, wear and attachments to the floor.
Rope handles	Inspect for damage, security of attachment.
Cylinder straps	Inspect for damage, deterioration, approved type fitted.
Padded basket edge trim	Inspect for damage and wear.
Burner support rods	Inspect for damage, wear and cracking.
Padded burner support rod covers	Inspect for damage and wear.
Basket equipment	Check presence and functionality.
Pilot restraint and anchor	Inspect for security and condition.
Fire extinguisher	Check expiration date and protection cover.
First aid kit	Check for completeness and expiration date.

### (d) Fuel cylinders

System/component/area	Task and inspection detail
Identification (type/serial number)	Check for presence.
Cylinder	Check if periodic inspections for each cylinder are valid (date) (e.g. 10 years' inspection).
Cylinder body	Inspect for damage, corrosion.
Liquid valve	Inspect for damage, corrosion, correct operation. Inspect O-ring seals, lubricate/replace as required.
Fixed liquid Level gauge	Inspect for damage, corrosion, correct operation.
Contents Gauge	Inspect for damage, corrosion, freedom of movement.
Vapour valve	Inspect for damage, corrosion, correct operation (including regulator). Check quick-release coupling for correct operation, sealing.
Padded cover	Inspect for damage. Check for correct thickness.



Pressure relief valve	Inspect for contamination, corrosion. Check service life limit.
Assembly	Inspect, and test for leaks all pressure-holding joints using leak detector.
	Perform functional test

### (e) Additional equipment

System/component/area	Task and inspection detail
Instruments	Perform functional check.
Quick release	Perform functional check and inspect the condition of the latch, bridle and ropes for wear and deterioration. Check that the karabiners are undamaged and operate correctly.
Communication/navigation equipment (radio)	Perform operational check.
Transponder	Perform operational check.

## GM1 ML.A.302(d)(2) Aircraft maintenance programme

### OPERATIONAL TEST AND FUNCTIONAL TEST

An operational test (or operational check) is a task used to determine that an item is operating normally. It does not require quantitative tolerances.

A functional test (or functional check) is a quantitative check to determine if one or more functions of an item performs within the limits specified in the appropriate maintenance data. The measured parameter should be recorded.

## AMC1 ML.A.302(d)(2)(d) Aircraft maintenance programme

### OPERATIONAL TEST OF TRANSPONDER

A transponder test carried out in accordance with EASA SIB 2011-15 or US Title 14 CFR Part 43 Appendix F is considered acceptable for the purpose of complying with the MIP task described in ML.A.302(d)(2)(d).

## GM1 ML.A.302(e) Aircraft maintenance programme

### AMP DOCUMENT NOT PRODUCED

The objective of point (4) is to ensure that all pilot-owners satisfy the conditions to perform pilot-owner maintenance, when it is intended to:

- (a) not produce the AMP document; and
- (b) carry out pilot-owner maintenance.

This is because, the AMP document, when produced, must identify the pilot-owners intending to carry out pilot-owner maintenance (ref. ML.A.302(c)(6)). If the AMP is not produced and such information is therefore not available, it must be ensured that all pilot-owners are by default authorised in accordance with ML.A.803.



Point (4) is only relevant when pilot-owner maintenance is to be carried out. ML.A.302(e) derogation is also possible when a CAMO (or CAO) is contracted.

## AMC1 ML.A.305 Aircraft continuing-airworthiness record system

- (a) Any other forms different from a logbook/log card of keeping the below information could be acceptable. For example, that could be in paper form, a spreadsheet or an IT system.
- (b) A log card and status for components other than propeller and engines could be combined in a single document.
- (c) If the AD is generally applicable to the aircraft or component type but is not applicable to the particular aircraft, engine, propeller or component, then this should be identified as well as the reason why it is not applicable. There is no need to list those ADs that are superseded or cancelled.
- (d) The current status of ADs should be sufficiently detailed to identify the complied AD and/or the due limit.
- (e) If the IT system is the only record-keeping system, it should have at least one backup system, which should be regularly updated.

## AMC1 ML.A.402 Performance of maintenance

- (a) Examples of acceptable methods to record and document the maintenance performed are the following:
  - a copy of the 100-h/annual inspection checklist with ticks and signature; and
  - a copy of the release to service indicating the tasks performed.
- (b) Airborne contamination (e.g. dust, precipitation, paint particles, filings) should be kept to a minimum to ensure aircraft/components surfaces are not contaminated. If this is not possible, all susceptible systems should be sealed until acceptable conditions are re-established.

## AMC1 ML.A.403 Aircraft defects

Aircraft equipment should be declared to be defective if there is a significant risk that it will fail to perform the functions required at a level of performance consistent with the acceptable level of safety of the operation. This does not prevent the pilot from recording observations and comments on the performance of the aircraft equipment where this is not considered to constitute a defect.

## GM1 ML.A.403 Aircraft defects

If appropriate certifying staff is readily available for consultation, the pilot should consider consultation with them before deferring any defect.

For balloons not operated under Subpart-ADD, sailplanes not operated under Subpart-DEC, or other aircraft operated under Part-NCO, the pilot may defer required equipment, regardless of whether or not a CAMO or CAO is contracted. However if doing so, he or she has the obligation to receive the agreement of the owner, or the contracted CAMO or CAO.

The term 'required' refers to equipment that is required by the applicable airworthiness code (certification specification) or required by the relevant regulations for air operations or the applicable rules of the air or as required by air traffic management (e.g. a transponder in certain controlled airspace).

## GM1 ML.A.501 Aircraft certificate of release to service

Components accepted by the owner in accordance with 21.A.307(c) of Part 21, or standard parts are eligible for installation without an EASA Form 1.

### AMC1 ML.A.501(e) Classification and installation

Baskets, burners and fuel cylinders are components which are often interchanged between different balloons. Furthermore, they are often removed/installed by the pilot-owner (or by other persons when such removal/installation is not considered maintenance because the task is described in the AFM).

As a consequence, an EASA Form 1 does not need to be issued when these components are removed in serviceable condition from a balloon, and can be installed on another balloon as long as the person performing the installation has access to the appropriate maintenance records necessary to establish their serviceable condition. In particular, due attention should be paid to the inspection dates of the various components.

This does not supersede the requirement to release any maintenance performed on such components either on an EASA Form 1 or equivalent or on the balloon maintenance log book, as applicable.

## GM1 ML.A.502 Component maintenance

### COMPONENT MAINTENANCE BY INDEPENDENT CERTIFYING STAFF

The cases where the independent certifying staff can release component maintenance are only valid when the independent certifying staff is allowed to carry out maintenance in the first place. Please refer to GM1 M.A.201.

As an example, in accordance with ML.A.201(e), the independent certifying staff cannot carry out maintenance when the balloon is operated under Subpart-ADD.

## AMC1 ML.A.801 Aircraft certificate of release to service

### AIRCRAFT CERTIFICATE OF RELEASE TO SERVICE (CRS) AFTER EMBODIMENT OF A STANDARD CHANGE OR A STANDARD REPAIR (SC/SR)

#### 1. Release to service and eligible persons

Only natural or legal persons entitled to release to service an aircraft after maintenance are considered as an eligible installer responsible for the embodiment of a SC/SR when in compliance with applicable requirements.

Other than under a pilot-owner authorisation, for aircraft where there is no Part-66 licence applicable, the release to service of an aircraft after embodiment of a SC/SR is only possible by holders of an appropriate certifying staff qualification valid in a Member State (national qualification), with the following conditions:

- If the holder signs the release to service on behalf of a maintenance organisation, this release is valid regardless of the Member State where the aircraft is registered.
- If the holder signs the release to service as an independent certifying staff, this release is only valid in the Member State responsible for such certifying staff qualification and where the aircraft is registered.

Depending on its nature, for certain SCs/SRs, CS-STAN might restrict the eligibility for the issuance of the release to service to certain persons (e.g. standard change/repair not suitable for release to service by the pilot-owner).

Since the design of the SC/SR does not require specific approval, the natural or legal person releasing the embodiment of the change or repair takes the responsibility that the applicable certification specifications within CS-STAN are fulfilled while being in compliance with Part-ML/Part-M Subpart F/Part-CAO and/or Part-145 and not in conflict with TC holders' data. This includes responsibility in respect of an adequate design, the selection/manufacturing of suitable parts and their identification, documenting the change or repair, generation or amendment of aircraft manuals and instructions as needed, embodiment of the change/repair, releasing the aircraft to service and record-keeping.

#### 2. Parts and appliances to be installed as part of a SC/SR

The design of the parts and appliances to be used in a SC/SR is considered a part of the change/repair, and, therefore, there is no need of a specific design approval. However, it is possible that for a particular SC, these certification specifications specifically require the use of parts and appliances that meet a technical standard. In this case, when the parts and appliances are required to be authorised as an ETSO article, other articles recognised as equivalent by means of an international safety agreement or grandfathered in accordance with Regulation (EU) No 748/2012 are equally acceptable.

Normally, a SC/SR shall not contain specifically designed parts that should be produced by a production organisation approved in accordance with Part 21 (POA). However, in the case that the change or repair would contain such a part, it should be produced by an approved Production Organisation (POA), and delivered with an EASA Form 1. An arrangement in accordance with 21.A.122(b) is not applicable.



Eligibility for installation of parts and appliances belonging to a SC/SR is subject to compliance with the Part 21 and Part-ML and maintenance organisation related provisions, and the situation varies depending on the aircraft in/on which the SC/SR is to be embodied, and who the installer is. The need for an EASA Form 1 is addressed in Part 21 and Part-ML, while less restrictive rules may, for instance, apply for ELA1 and ELA2 aircraft parts (e.g. 21.A.307) and sailplane parts (e.g. AMC 21.A.303 of the 'AMC and GM to Part 21'). Furthermore, Part-M Subpart F, Part-CAO and Part-145 contain provisions (i.e. M.A.603(c), CAO.A.020(c) and 145.A.42(c)) that allow maintenance organisations to fabricate certain parts to be installed in/on the aircraft as part of their maintenance activities.

### 3. Parts and appliances identification

The parts modified or installed during the embodiment of the SC/SR need to be permanently marked in accordance with Part 21 Subpart Q.

### 4. Documenting the SC/SR and declaring compliance with the certification specifications

In accordance with Part-ML, Part-M Subpart F, Part-CAO or Part-145 (e.g. ML.A.801(e), M.A.612, CAO.A.065 and 145.A.50(b)), the legal or natural person responsible for the embodiment of a change or a repair should compile details of the work accomplished. In the case of SCs/SRs, this includes, as necessary, based on its complexity, an engineering file containing drawings, a list of the parts and appliances used for the change or repair, supporting analysis and the results of tests performed or any other evidence suitable to show that the design fulfils the applicable certification specifications within CS-STAN together with a statement of compliance and amendments to aircraft manuals, to instructions for continuing airworthiness and to other documents such as aircraft parts list, wiring diagrams, etc. as deemed necessary. The EASA Form 123 is prepared for the purpose of documenting the preparation and embodiment of the SC/SR. The aircraft logbook should contain an entry referring to EASA Form 123; both EASA Form 123 and the release to service required after the embodiment of the SC/SR should be signed by the same person.

EASA Form 123 and all the records listed on it should follow elementary principles of controlled documentation, e.g. contain reference number of documents, issue dates, revision numbers, name of persons preparing/releasing the document, etc.

### 5. Record-keeping

The legal or natural person responsible (see paragraph 1. above) for the embodiment of the change/repair should keep the records generated with the SC/SR as required by Part-ML, Part-M Subpart F, Part-CAO or Part-145 and CS-STAN.

In addition, ML.A.305 requires that the aircraft owner (or CAMO or CAO, if a contract in accordance with ML.A.201 exists) keeps the status of the changes/repairs embodied in/on the aircraft in order to control the aircraft configuration and manage its continuing airworthiness.

With regard to SCs/SRs, the information provided to the owner, CAMO or CAO may be listed in EASA Form 123 and should include, as required, a copy of any modified aircraft manual and/or instructions for continuing airworthiness. All this information should normally be consulted when the aircraft undergoes an airworthiness review, and, therefore, a clear system to record the embodiment of SCs/SRs, which is also easily traceable, would be of help during subsequent aircraft inspections.



**6. Instructions for continuing airworthiness (ICA)**

As stipulated in ML.A.302, the aircraft owner, CAMO or CAO needs to assess if the changes in the ICA of the aircraft require to amend the AMP.

**7. Embodiment of more than one SC**

The embodiment of two or more related SCs described in Subpart B of CS-STAN is permitted as a single change (the use of one EASA Form 123 only) as long as adequate references to and records of all SCs embodied are captured. Restrictions and limitations of the two (or more) SCs would apply. It is permitted to issue a single release to service containing adequate traceability of all the SCs embodied.

**8. Acceptable form to be used to record the embodiment of SCs/SRs**

**EASA Form 123 — Standard Change/Standard Repair (SC/SR) embodiment record**

<b>EASA Form 123 — Standard Change/Standard Repair (SC/SR) embodiment record</b>		1. SC/SR number(s):
2. SC/SR title & description:		
3. Applicability:		
4. List of parts (description/Part-No/Qty):		
5. Operational limitations/affected aircraft manuals. Copies of these manuals are provided to the aircraft owner:		
6. Documents used for the development and embodiment of this SC/SR:		
* Copies of the documents marked with an asterisk are handed to the aircraft owner.		
7. Instructions for continuing airworthiness. Copies of these manuals are provided to the aircraft owner:		
8. Other information:		
9a. <input type="checkbox"/> This SC complies with the criteria established in 21.A.90B(a) and with the relevant paragraphs of CS-STAN.		
9b. <input type="checkbox"/> This SR complies with the criteria established in 21.A.431B(a) and with the relevant paragraphs of CS-STAN.		
10. Date of SC/SR embodiment:	11. Identification data and signature of the person responsible for the embodiment of the SC/SR:	
12. Signature of the aircraft owner. This signature attests that all relevant documentation is handed over from the issuer of this form to the aircraft owner, and, therefore, the latter becomes aware of any impact or limitations on operations or additional continuing airworthiness requirements which may apply to the aircraft due to the embodiment of the change/repair.		

Form 123 Issue 00

Notes:

An agency of the European Union

Original remains with the legal or natural person responsible for the embodiment of the SC/SR.

The aircraft owner should retain a copy of this form.

The aircraft owner should be provided with copies of the documents referenced in boxes 5 and 7 and those in box 6 marked with an asterisk '\*'.

The 'relevant paragraphs' in boxes 9a and 9b refer to the applicable paragraphs of 'Subpart A – General' of CS-STAN and those of the SC/SR quoted in box 2.

For box 12, when the aircraft owner has signed a contract in accordance with ML.A.201, it is possible that the CAMO or CAO representative signs box 12 and provides all relevant information to the owner before next flight.

Completion instructions:

Use English or the official language of the State of registry to fill in the form.

1. Identify the SC/SR with a unique number and reference this number in the aircraft logbook.
2. Specify the applicable EASA CS-STAN chapter including revision (e.g. CS-SCxxx or CS-SRxxx) & title. Provide also a short description.
3. Identify the aircraft (a/c) registration, serial number and type.
4. List the parts' numbers and description for the parts installed. Refer to an auxiliary document if necessary.
5. Identify affected aircraft manuals.
6. Refer to the documentation developed to support the SC/SR and its embodiment, including design data required by CS-STAN: design definition, documents recording the showing of compliance with the certification specifications or any test result, etc. The documents' references should quote their revision/issue.
7. Identify instructions for continuing airworthiness that need to be considered for the aircraft maintenance programme review.
8. To be used as deemed necessary by the installer.

9a., 9b., 10. and 12. Self-explanatory.

11. Give full name details and certificate reference (of the natural or legal person) used for issuing the aircraft release to service.

## AMC1 ML.A.801(e) Aircraft certificate of release to service

(a) The aircraft CRS should contain one of the following statements:

- (1) 'certifies that the work specified, except as otherwise specified, was carried out in accordance with Part-ML, and in respect to that work, the aircraft is considered ready for release to service.'; or
- (2) for a pilot-owner:

'certifies that the limited pilot-owner maintenance specified, except as otherwise specified, was carried out in accordance with Part M, and in respect to that work, the aircraft is considered ready for release to service.'

(b) The CRS should relate to the task specified in the DAH's or operator's instruction or the AMP which itself may cross-refer to a DAH's/operator's instruction in a maintenance manual, service bulletin, etc. This should indicate the revision status of the maintenance instruction used.

(c) The CRS should include the date when the maintenance took place relative to any life or overhaul limitation in terms of date/flying hours/cycles/ landings etc. as appropriate.

(d) When extensive maintenance has been carried out, it is acceptable for the CRS to summarise the maintenance as long as there is a unique cross reference to the work pack containing full details of the maintenance carried out. Dimensional information should be retained in the work pack record.



- (e) The person issuing the CRS should use his or her normal signature except in the case where a computer release-to-service system is used. In this latter case, the competent authority needs to be satisfied that only this particular person may electronically issue the CRS. One such method of compliance is the use of a magnetic or optical personal card in conjunction with a personal identification number (PIN) known only to the individual, which is keyed into the computer. A certification stamp is optional.
- (f) At the completion of all maintenance, owners, certifying staff, operators and maintenance organisations should ensure they have a clear, concise and legible record of the work performed.
- (g) In the case of an ML.A.801(b)(2) CRS, the independent certifying staff should retain all records necessary to prove that all requirements have been met for the issuance of a CRS.

## AMC1 ML.A.801(f) Aircraft certificate of release to service

Certain maintenance data issued by the design approval holder (e.g. AMM) requires that a maintenance task be performed in flight as a necessary condition to complete the maintenance ordered. Within the aircraft limitations, the person authorised to certify the maintenance per ML.A.801 should release the incomplete maintenance before this flight. GM1 ML.A.301(f) describes the relations with the aircraft operator, which retains the responsibility for the 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 ML.A.801.

## AMC1 ML.A.803 Pilot-owner authorisation

- (a) A pilot-owner may only issue a CRS for the maintenance he or she has performed (ref. ML.A.201(c), ML.A.801 and ML.A.803).
- (b) In the case of jointly-owned aircraft, the AMP should list the names of all pilot-owners that are competent and designated to perform pilot-owner maintenance (ref. ML.A.302(c)(6)). As an alternative, the AMP may contain a procedure to ensure how such a list should be managed and kept current.
- (c) An equivalent valid pilot-owner licence may be any document attesting a pilot qualification recognised by the Member State.
- (d) Not holding a valid medical examination does not invalidate the pilot licence (or equivalent) required under ML.A.803(a)(1) for the purpose of the pilot-owner authorisation.

## GM1 ML.A.901 Aircraft airworthiness review

If a CAMO/CAO holding the AR privilege is contracted by the owner, this organisation does not have the obligation to carry out the airworthiness review itself. The owner may select another CAMO or CAO to carry out the airworthiness review, or request the maintenance organisation to carry it out and issue the ARC in conjunction with the annual inspection.



Please refer to GM1 ML.A.201 to identify the cases where the owner may also request an independent certifying staff (authorised by the competent authority) to carry out the airworthiness review and issue the ARC in conjunction with the annual inspection.

Point ML.A.901(b) gives a list of the different organisations or persons that are allowed to perform an airworthiness review; it does not presume that they have the obligation to accept a request to carry out an airworthiness review.

## GM1 ML.A.904(c);(d) Qualification of airworthiness review staff

### AIRWORTHINESS REVIEW BY INDEPENDENT CERTIFYING STAFF

- (a) ML.A.904(c) and (d) refer to the independent certifying staff. The terms 'corresponding aircraft' or 'particular aircraft' mean that the person meets at the time of the airworthiness review the certifying staff requirements for the aircraft subject to the airworthiness review.
- (b) The authorisation issued to the certifying staff by the competent authority should only be granted after assessment of the knowledge required in point (d)(1) and after the satisfactory performance of an airworthiness review under supervision of the competent authority (point (d)(2)).



## SECTION B

### PROCEDURE FOR COMPETENT AUTHORITIES

#### AMC1 ML.B.201 Responsibilities

Template that can be used by the owner, CAO or CAMO upon request by the competent authority to collect information about the AMP:

Part-ML aircraft maintenance programme (AMP)			
Aircraft identification			
1	Registration(s):	Type:	Serial no(s):
Which basis is used for the maintenance programme?			
2	Design approval holder (DAH) ICA <input type="checkbox"/>	Minimum inspection programme (MIP) as detailed in the latest revision of AMC ML.A.302(d) <input type="checkbox"/> Other MIP complying with ML.A.302(d) <input type="checkbox"/>	
Approval/declaration of the maintenance programme (select the appropriate option)			
3	<input type="checkbox"/> AMP declared by the owner <input type="checkbox"/> Default AMP <input type="checkbox"/> Approved by the contracted CAMO/CAO. Approval reference of the organisation: _____		

#### AMC1 ML.B.303 Aircraft continuing airworthiness monitoring

The competent authority survey programme developed in accordance with Part-M (M.B.303) provides an acceptable basic structure for the survey programme required for Part-ML aircraft.



## AMC TO APPENDICES TO PART-ML

### AMC1 to Appendix II to Part-ML — Limited pilot-owner maintenance

- (a) The lists below specifies items that may be expected to be completed by an owner who holds a current and valid pilot licence for the aircraft type involved and who meets the competence and responsibility requirements of Appendix II to Part-ML.
- (b) The list of tasks may not address in a detailed manner the specific needs of the various aircraft categories. In addition, the development of technology and the nature of the operations undertaken by these categories of aircraft may not always be adequately considered.
- (c) Any other task meeting the requirements of Appendix II to Part-ML may also be performed by the pilot-owner.
- (d) Therefore, the following lists are considered to meet the representative scope of limited pilot-owner maintenance referred to in ML.A.803 and Appendix II to Part-ML:
  - (1) Part A applies to aeroplanes;
  - (2) Part B applies to rotorcraft;
  - (3) Part C applies to sailplanes and powered sailplanes; and
  - (4) Part D applies to balloons and airships.
- (e) Inspection tasks/checks of any periodicity included in an approved maintenance programme can be carried out provided that the specified tasks are included in the generic lists of Parts A to D of this AMC and remain compliant with the basic principles of Appendix II to Part-ML.

The content of periodic inspections/checks as well as their periodicity is not regulated or standardised in an aviation specification. It is the decision of the DAH to recommend a schedule for each specific type of inspection/check.

For an inspection/check with the same periodicity for different aircraft, the content may differ and in some cases, may be critically safety-related and need the use of special tools or knowledge and thus, not qualify for pilot-owner maintenance. Therefore, the maintenance carried out by the pilot-owner should not be generalised to specific inspections such as of a 50-h, 100-h or 6-month periodicity.

The inspections to be carried out are limited to those areas and tasks listed in this AMC to Appendix II; this allows flexibility in the development of the maintenance programme and does not limit the inspection to certain specific periodic inspections. A 50-h/6-month periodic inspection for a fixed-wing aeroplane as well as the 1-year inspection for a glider may normally be eligible for pilot-owner maintenance.

**TABLES**

Note: Tasks in Part A or Part B marked with ‘\*\*’ exclude instrument flight rules (IFR) operations following pilot-owner maintenance. For these aircraft to operate under IFR, these tasks should be released by an appropriate certifying staff.

**Part A — PILOT-OWNER MAINTENANCE TASKS FOR POWERED AIRCRAFT (AEROPLANES)**

ATA	Area	Task	Aeroplanes
09	Towing	Tow release unit and tow cable retraction mechanism — cleaning, lubrication and tow cable replacement (including weak links)	Yes
		Mirror — installation and replacement of mirrors	Yes
11	Placards	Placards, markings — installation and renewal of placards and markings required by the AFM and aircraft maintenance manual (AMM)	Yes
12	Servicing	Those items not requiring a disassembly of other than non-structural items, such as cover plates, cowlings and fairings — lubrication	Yes
20	Standard practices	Safety wiring — replacement of defective safety wiring or cotter keys, excluding those in engine controls, transmission controls and flight control systems	Yes
		Simple non-structural standard fasteners — replacement and adjustment, excluding the replacement of receptacles and anchor nuts requiring riveting	Yes
21	Air conditioning	Replacement of flexible hoses and ducts	Yes
23	Communication	Communication devices — remove and replace self-contained, instrument-panel-mounted communication devices with quick-disconnect connectors, excluding IFR operations	Yes**
24	Electrical power	Batteries — replacement and servicing, excluding servicing of nickel-cadmium (Ni-Cd) batteries and IFR operations	Yes**
		Wiring — repairing broken circuits in non-critical equipment, excluding ignition system, primary generating system and required communication, as well as navigation system and primary flight instruments	Yes



		Bonding — replacement of broken bonding cable	Yes
		Fuses — replacement using the correct rating	Yes
25	Equipment	Safety belts — replacement of safety belts and harnesses excluding belts fitted with airbag systems	Yes
		Seats — replacement of seats or seat parts not involving disassembly of any primary structure or control system	Yes
		Non-essential instruments and/or equipment — replacement of self-contained, instrument-panel-mounted equipment with quick-disconnect connectors	Yes
		Oxygen system — replacement of portable oxygen bottles and systems in approved mountings, excluding permanently installed bottles and systems	Yes
		Emergency locator transmitter (ELT) — removal/reinstallation	Yes
27	Flight controls	Removal or reinstallation of co-pilot control column and rudder pedals where design provides for quick disconnect	Yes
28	Fuel system	Fuel filter elements — cleaning and/or replacement	Yes
30	Ice and rain protection	Windscreen wiper — replacement of wiper blade	Yes
31	Instruments	Instrument panel — removal and reinstallation provided that this is a design feature with quick-disconnect connectors, excluding IFR operations	Yes**
		Pitot-static system — simple sense and leak check, excluding IFR operations	Yes**
		Drainage — drainage of water drainage traps or filters within the pitot-static system, excluding IFR operations	Yes**
		Instruments — checking of markings for legibility and that those readings are consistent with ambient conditions	Yes
32	Landing gear	Wheels — removal, replacement and servicing, including replacement of wheel bearings and lubrication	Yes
		Servicing — replenishment of hydraulic fluid	Yes



		Shock absorber — replacement of elastic cords or rubber dampers	Yes
		Shock struts — replenishment of oil or air	Yes
		Skis — changing between wheel and ski landing gear	Yes
		Landing skids — replacement of landing skids and skid shoes	Yes
		Wheel fairings (spats) — removal and reinstallation	Yes
		Mechanical brakes — adjustment of simple cable-operated systems	Yes
		Brake — replacement of worn brake pads	Yes
33	Lights	Lights — replacement of internal and external bulbs, filaments, reflectors and lenses	Yes
34	Navigation	Software — updating self-contained, instrument-panel-mounted software, excluding automated flight control systems and transponders	Yes
		Navigation devices — removal and replacement of self-contained, instrument-panel-mounted navigation devices with quick-disconnect connectors, excluding automated flight control systems, transponders, primary flight control system and IFR operations	Yes**
		Self-contained data logger — installation, data restoration	Yes
51	Structure	Fabric patches — simple patches extending over no more than one rib, and not requiring rib stitching or removal of structural parts or control surfaces	Yes
		Protective coating — application of preservative material or coatings where no disassembly of any primary structure or operating system is involved	Yes
		Surface finish — minor restoration (where no disassembly of any primary structure or operating system is involved), including application of signal coatings or thin foils as well as registration markings	Yes
		Fairings — simple repairs to non-structural fairings and cover plates that do not change the contour	Yes

52	Doors and hatches	Doors — removal and reinstallation	Yes
53	Fuselage	Upholstery, furnishing — minor repairs that do not require disassembly of primary structure or operating systems, or interfere with control systems	Yes
56	Windows	Side windows — replacement if no riveting, bonding or any special process is required	Yes
61	Propeller	Spinner — removal and reinstallation	Yes
71	Power plant installation	Cowling — removal and reinstallation not requiring removal of propeller or disconnection of flight controls	Yes
		Induction system — inspection and replacement of induction air filter	Yes
72	Engine	Chip detectors — removal, checking and reinstallation provided that the chip detector is of a non-electrically-indicated self-sealing type	Yes
73	Engine fuel	Strainer or filter elements — cleaning and/or replacement	Yes
		Fuel — mixing of required oil into fuel	Yes
74	Ignition	Spark plugs — removal, cleaning, adjustment and reinstallation	Yes
75	Cooling	Coolant — replenishment of coolant fluid	Yes
77	Engine-indicating system	Engine-indicating system — removal and replacement of self-contained, instrument-panel-mounted indicators that have quick-release connectors and do not employ direct reading connections	Yes
79	Oil system	Strainer or filter elements — cleaning and/or replacement	Yes
		Oil — changing or replenishment of engine oil and gearbox fluid	Yes



## Part B — PILOT-OWNER MAINTENANCE TASKS FOR ROTORCRAFT

ATA	Area	Task	Rotorcraft
11	Placards	Placards, markings — installation and renewal of placards and markings required by the AFM and the AMM	Yes
12	Servicing	Fuel, oil, hydraulic, de-iced and windshield liquid replenishment	Yes
		Those items not requiring a disassembly of other than non-structural items, such as cover plates, cowlings and fairings — lubrication	Yes
20	Standard practices	Safety wiring — replacement of defective safety wiring or cotter keys, excluding those in engine controls, transmission controls and flight control systems	Yes
		Simple non-structural standard fasteners — replacement and adjustment, excluding latches as well as the replacement of receptacles and anchor nuts requiring riveting	Yes
21	Air conditioning	Replacement of flexible hoses and ducts	Yes
23	Communication	Communication devices — removal and replacement of self-contained, instrument-panel-mounted communication devices with quick-disconnect connectors, excluding IFR operations	Yes**
24	Electrical power	Batteries — replacement and servicing, excluding servicing of Ni-Cd batteries and IFR operations	Yes**
		Wiring — repairing broken circuits in non-critical equipment, excluding ignition system, primary generating system and required communication, navigation system and primary flight instruments	Yes
		Bonding — replacement of broken bonding cable, excluding bonding of rotating parts and flying controls	Yes
		Fuses — replacement using the correct rating	Yes
25	Equipment	Safety belts — replacement of safety belts and harnesses, excluding belts fitted with airbag systems	Yes



ATA	Area	Task	Rotorcraft
		Seats — replacement of seats or seat parts not involving disassembly of any primary structure or control system, excluding flight crew seats	Yes
		Removal/installation of emergency flotation gears with quick-disconnect connectors	Yes
		Non-essential instruments and/or equipment — replacement of self-contained, instrument-panel-mounted equipment with quick-disconnect connectors	Yes
		ELT — removal/reinstallation	Yes
30	Protection from ice and rain	Windshield wiper replacement	Yes
31	Instruments	Instrument panel — removal and reinstallation provided that it is a design feature with quick-disconnect connectors, excluding IFR operations	Yes**
		Pitot-static system — simple sense and leak check, excluding IFR operations	Yes**
		Drainage — drainage of water drainage traps or filters within the pitot-static system, excluding IFR operations	Yes**
		Instruments — checking of markings for legibility and that those readings are consistent with ambient conditions	Yes
32	Landing gear	Wheels — removal, replacement and servicing, including replacement of wheel bearings and lubrication	Yes
		Replacement of skid wear shoes	Yes
		Fitting and removal of snow landing pads	Yes
		Servicing — replenishment of hydraulic fluid	Yes
		Brake — replacement of worn brake pads	Yes
33	Lights	Lights — replacement of internal and external bulbs, filaments, reflectors and lenses	Yes



ATA	Area	Task	Rotorcraft
34	Navigation	Software — updating of self-contained, instrument-panel-mounted software, excluding automated flight control systems and transponders	Yes
		Navigation devices — removal and replacement of self-contained, instrument-panel-mounted navigation devices with quick-disconnect connectors, excluding automated flight control systems, transponders, primary flight control system and IFR operations	Yes**
		Self-contained data logger — installation, data restoration	Yes
51	Structure	Protective coating — application of preservative material or coatings where no disassembly of any primary structure or operating system is involved	Yes
		Surface finish — minor restoration (where no disassembly of any primary structure or operating system is involved, excluding intervention on main and tail rotors), including application of signal coatings or thin foils as well as registration markings	Yes
		Fairings — simple repairs to non-structural fairings and cover plates that do not change the contour	Yes
52	Doors	Doors — removal and reinstallation	Yes
53	Fuselage	Upholstery, furnishing — minor repairs that do not require disassembly of primary structure or operating systems, or interfere with control systems	Yes
56	Windows	Side windows — replacement if no riveting, bonding or any special process is required	Yes
62	Main rotor	Removal/installation of main-rotor blades (designed for removal where special tools are not required, excluding tail-rotor blades), limited to reinstallation of the same blades previously removed in the original position	Yes
63 65	Transmission	Chip detectors — removal, checking and replacement provided that the chip detector is of a non-electrically-indicated self-sealing type	Yes



ATA	Area	Task	Rotorcraft
67	Flight control	Removal or reinstallation of co-pilot cyclic and collective controls and yaw pedals where design provides for quick disconnect	Yes
71	Power plant installation	Cowlings — removal and refitment	Yes
72	Engine	Chip detectors — removal, checking and reinstallation provided that the chip detector is of a non-electrically-indicated self-sealing type	Yes
79	Oil system	Filter elements — replacement, provided that the element is of the 'spin on/off' type	Yes
		Oil — changing or replenishment of engine oil	Yes



## Part C — PILOT-OWNER MAINTENANCE TASKS for SAILPLANES AND POWERED SAILPLANES

Abbreviations/acronyms applicable to this Part:

- n/a not applicable for this category;
- SP sailplane;
- SSPS self-sustained powered sailplane; and
- SLPS/TM self-launching powered sailplane/touring motorglider.

ATA	Area	Task	SP	SSPS	SLPS/TM
08	Weighing	Recalculation, small changes of the trim plan without needing a reweighing	Yes	Yes	Yes
09	Towing	Tow release unit and tow cable retraction mechanism — cleaning, lubrication and tow cable replacement (including weak links)	Yes	Yes	Yes
		Mirror — installation and replacement of mirrors	Yes	Yes	Yes
11	Placards	Placards, markings — installation and renewal of placards and markings required by the AFM and the AMM	Yes	Yes	Yes
12	Servicing	Those items not requiring a disassembly of other than non-structural items, such as cover plates, cowlings and fairings — lubrication	Yes	Yes	Yes
20	Standard practices	Safety wiring — replacement of defective safety wiring or cotter keys, excluding those in engine controls, transmission controls and flight control systems	Yes	Yes	Yes
		Simple non-structural standard fasteners — replacement and adjustment, excluding the replacement of receptacles and anchor nuts requiring riveting	Yes	Yes	Yes
		Free play — measurement of the free play in the control system and the wing-to-fuselage attachment, including minor adjustments by simple means provided by the manufacturer	Yes	Yes	Yes
21	Air conditioning	Replacement of flexible hoses and ducts	Yes	Yes	Yes



ATA	Area	Task	SP	SSPS	SLPS/TM
23	Communication	Communication devices — removal and replacement of self-contained, instrument-panel-mounted communication devices with quick-disconnect connectors	Yes	Yes	Yes
24	Electrical power	Batteries and solar panels — replacement and servicing	Yes	Yes	Yes
		Wiring — installation of simple wiring connections to the existing wiring for additional non-required equipment, such as electric variometers, flight computers, but excluding required communication, navigation systems and engine wiring	Yes	Yes	Yes
		Wiring — repairing of broken circuits in landing light and any other wiring for non-required equipment, such as electrical variometers or flight computers, excluding ignition system, primary generating system, required communication and navigation system, as well as primary flight instruments	Yes	Yes	Yes
		Bonding — replacement of broken bonding cable	Yes	Yes	Yes
		Switches — this includes soldering and crimping of non-required equipment, such as electrical variometers or flight computers, but excluding ignition system, primary generating system, required communication and navigation system, as well as primary flight instruments	Yes	Yes	Yes
		Fuses — replacement using the correct rating	Yes	Yes	Yes
25	Equipment	Safety belts — replacement of safety belt and harnesses	Yes	Yes	Yes
		Seats — replacement of seats or seat parts not involving disassembly of any primary structure or control system	Yes	Yes	Yes
		Non-essential instruments and/or equipment — replacement of self-contained, instrument-	Yes	Yes	Yes



ATA	Area	Task	SP	SSPS	SLPS/TM
		panel-mounted equipment with quick-disconnect connectors			
		Removal and installation of non-required instruments and/or equipment	Yes	Yes	Yes
		Wing wiper, cleaner — servicing, removal and reinstallation not involving disassembly or modification of any primary structure and/or control	Yes	Yes	Yes
		Static probes — removal or reinstallation of variometer static-and-total-energy compensation probes	Yes	Yes	Yes
		Oxygen system — replacement of portable oxygen bottles and systems in approved mountings, excluding permanently installed bottles and systems	Yes	Yes	Yes
		Air brake chute — installation and servicing	Yes	Yes	Yes
		ELT — removal/reinstallation	Yes	Yes	Yes
26	Fire protection	Fire warning — replacement of sensors and indicators	n/a	Yes	Yes
27	Flight control	Gap seals — installation and servicing if no complete flight control removal is required	Yes	Yes	Yes
		Control system — measurement of the control system travel without removing the control surfaces	Yes	Yes	Yes
		Control cables — simple optical inspection for condition	Yes	Yes	Yes
		Gas dampener — replacement of gas dampener in the control or air brake system	Yes	Yes	Yes
		Co-pilot stick and pedals — removal or reinstallation where design provides for quick disconnect	Yes	Yes	Yes



ATA	Area	Task	SP	SSPS	SLPS/TM
28	Fuel system	Fuel lines — replacement of prefabricated fuel lines fitted with self-sealing couplings	n/a	Yes	No
		Fuel filter — cleaning and/or replacement	n/a	Yes	Yes
31	Instruments	Instrument panel — removal and reinstallation provided that it is a design feature with quick disconnect, excluding IFR operations	Yes	Yes	Yes
		Pitot-static system — simple sense and leak check	Yes	Yes	Yes
		Instrument panel vibration damper/shock absorbers — replacement	Yes	Yes	Yes
		Drainage — drainage of water drainage traps or filters within the pitot-static system	Yes	Yes	Yes
		Flexible tubes — replacement of damaged tubes	Yes	Yes	Yes
32	Landing gear	Wheels — removal, replacement and servicing, including replacement of wheel bearings and lubrication	Yes	Yes	Yes
		Servicing — replenishment of hydraulic fluid	Yes	Yes	Yes
		Shock absorber — replacement or servicing of elastic cords or rubber dampers	Yes	Yes	Yes
		Shock struts — replenishment of oil or air	Yes	Yes	Yes
		Landing-gear doors — removal or reinstallation and repair including operating straps	Yes	Yes	Yes
		Skis — changing between wheel and ski landing gear	Yes	Yes	Yes
		Skids — removal or reinstallation and servicing of main, wing and tail skids	Yes	Yes	Yes
		Wheel fairings (spats) — removal and reinstallation	Yes	Yes	Yes
		Mechanical brakes — adjustment of simple cable-operated systems	Yes	Yes	Yes



ATA	Area	Task	SP	SSPS	SLPS/TM
		Brake — replacement of worn brake pads	Yes	Yes	Yes
		Springs — replacement of worn or aged springs	Yes	Yes	Yes
		Gear warning — removal or reinstallation of simple gear-warning systems	Yes	Yes	Yes
33	Lights	Lights — replacement of internal and external bulbs, filaments, reflectors and lenses	n/a	n/a	Yes
34	Navigation	Software — updating of self-contained, instrument-panel-mounted software, excluding automated flight control systems and transponders, and including update of non-required instruments/equipment	Yes	Yes	Yes
		Navigation devices — removal and replacement of self-contained, instrument-panel-mounted navigation devices with quick-disconnect connectors, excluding automated flight control systems, transponders, primary flight control system	Yes	Yes	Yes
		Self-contained data logger — installation, data restoration	Yes	Yes	Yes
51	Structure	Fabric patches — simple patches extending over no more than one rib, and not requiring rib stitching or removal of structural parts or control surfaces	Yes	Yes	Yes
		Protective coating — application of preservative material or coatings where no disassembly of any primary structure or operating system is involved	Yes	Yes	Yes
		Surface finish — minor restoration of paint or coating (where the underlying primary structure is not affected), including application of signal coatings or thin foils as well as registration markings	Yes	Yes	Yes
		Fairings — simple repairs to non-structural fairings and cover plates that do not change the contour	Yes	Yes	Yes



ATA	Area	Task	SP	SSPS	SLPS/TM
52	Doors	Doors — removal and reinstallation	Yes	Yes	Yes
53	Fuselage	Upholstery, furnishing — minor repairs which do not require disassembly of primary structure or operating systems, or interfere with control systems	Yes	Yes	Yes
56	Windows	Side windows — replacement if no riveting, bonding or any special process is required	Yes	Yes	Yes
		Canopies — removal and refitment	Yes	Yes	Yes
		Gas dampener — replacement of canopy gas dampener	Yes	Yes	Yes
57	Wings	Wing skids — removal or reinstallation and service of lower wing skids or wing roller including spring assembly	Yes	Yes	Yes
		Water ballast — removal or reinstallation of flexible tanks	Yes	Yes	Yes
		Turbulator and sealing tapes — removal or reinstallation of approved sealing tapes and turbulator tapes	Yes	Yes	Yes
61	Propeller	Spinner — removal and reinstallation	n/a	Yes	Yes
71	Power plant installation	Removal or installation of power plant unit including engine and propeller	n/a	Yes	No
		Cowling — removal and reinstallation not requiring removal of propeller or disconnection of flight controls	n/a	Yes	Yes
		Induction system — inspection and replacement of induction air filter	n/a	Yes	Yes
72	Engine	Chip detectors — removal, checking and reinstallation provided that the chip detector is of a non-electrically indicated self-sealing type	n/a	Yes	Yes
73	Engine fuel	Strainer or filter elements — cleaning and/or replacement	n/a	Yes	Yes



ATA	Area	Task	SP	SSPS	SLPS/TM
		Fuel — mixing of required oil into fuel	n/a	Yes	Yes
74	Ignition	Spark plugs — removal, cleaning, adjustment and reinstallation	n/a	Yes	Yes
75	Cooling	Coolant — replenishment of coolant fluid	n/a	Yes	Yes
76	Engine controls	Controls — minor adjustments of non-flight or propulsion controls whose operation is not critical for any flight phase	n/a	Yes	No
77	Engine-indicating system	Engine-indicating system — removal and replacement of self-contained instrument-panel-mounted indicators that have quick-release connectors and do not employ direct reading connections	n/a	Yes	Yes
79	Oil system	Strainer or filter elements — cleaning and/or replacement	n/a	Yes	Yes
		Oil — changing or replenishment of engine oil and gearbox fluid	n/a	Yes	Yes



## Part D — PILOT-OWNER MAINTENANCE TASKS for BALLOONS/AIRSHIPS

Area and task	Hot-air airship	Hot-air balloon	Gas balloon
<b>(A) ENVELOPE</b>			
(1) Fabric repairs — excluding complete panels (as defined in, and in accordance with, the TCH instructions) not requiring load tape repair or replacement	Yes	Yes	NO
(2) Nose line — replacement	Yes	n/a	n/a
(3) Banners — fitment, replacement or repair (without sewing)	Yes	Yes	Yes
(4) Melting link (temperature flag) — replacement	Yes	Yes	n/a
(5) Temperature transmitter and temperature indication cables — removal or reinstallation	Yes	Yes	n/a
(6) Crown line — replacement (where permanently attached to the crown ring)	No	Yes	n/a
(7) Scoop or skirt — replacement or repair (including fasteners)	Yes	Yes	n/a
<b>(B) BURNER</b>			
(8) Burner — cleaning and lubrication	Yes	Yes	n/a
(9) Piezo igniters — adjustment	Yes	Yes	n/a
(10) Burner jets — cleaning and replacement	Yes	Yes	n/a
(11) Burner frame corner buffers — replacement or reinstallation	Yes	Yes	n/a
(12) Burner valves — adjustment of closing valve not requiring special tools or test equipment	Yes	Yes	n/a
(13) Burner hoses — replacement of O-rings in the inlet connection	Yes	Yes	n/a
<b>(C) BASKET AND GONDOLA</b>			
(14) Basket/gondola frame trim — repair or replacement	Yes	Yes	Yes



Area and task	Hot-air airship	Hot-air balloon	Gas balloon
(15) Basket/gondola runners (including wheels) — repair or replacement	Yes	Yes	Yes
(16) External rope handles — repair	Yes	Yes	Yes
(17) Seat covers, upholsteries and safety belts — replacement	Yes	Yes	Yes
<b>(D) FUEL CYLINDER</b>			
(18) Liquid valve — replacement of O-rings in the outlet	Yes	Yes	No
<b>(E) INSTRUMENTS AND EQUIPMENT</b>			
(19) Batteries — replacement of batteries for self-contained instruments and communication equipment	Yes	Yes	Yes
(20) Communication, navigation devices, instruments and/or equipment — removal and replacement of self-contained, instrument-panel-mounted communication devices with quick-disconnect connectors	Yes	Yes	Yes
<b>(F) ENGINES</b>			
(21) Cleaning and lubrication not requiring disassembly of other than non-structural items, such as cover plates, cowlings and fairings	Yes	n/a	n/a
(21) Cowling removal and refitment not requiring removal of the propeller	Yes	n/a	n/a
(22) Fuel and oil strainers and/or filter elements — removal, cleaning and/or replacement	Yes	n/a	n/a
(23) Batteries — replacement and servicing (excluding servicing of Ni-Cd batteries)	Yes	n/a	n/a
(24) Propeller spinner — removal and installation for inspection	Yes	n/a	n/a
(25) Power plant — removal or installation of power plant unit including engine and propeller	Yes	n/a	n/a
(26) Engine chip detectors — removal, checking and replacement	Yes	n/a	n/a



Area and task	Hot-air airship	Hot-air balloon	Gas balloon
(27) Ignition spark plug — removal or installation and adjustment including gap clearance	Yes	n/a	n/a
(28) Coolant fluid — replenishment	Yes	n/a	n/a
(29) Engine controls — minor adjustments of non-flight or propulsion controls whose operation is not critical for any flight phase	Yes	n/a	n/a
(30) Engine instruments — removal and replacement	Yes	n/a	n/a
(31) Lubrication oil — changing or replenishment of engine oil and gearbox fluid	Yes	n/a	n/a
(32) Fuel lines — replacement of prefabricated hoses with self-sealing couplings	Yes	n/a	n/a
(33) Air filters (if installed) — removal, cleaning and replacement	Yes	n/a	n/a



### 3.2. Draft AMC and GM to Part-CAO (draft EASA decision)

## SECTION A ORGANISATION REQUIREMENTS

### AMC1 CAO.A.015 Application

An application should be made on an EASA Form 2 (Appendix IX to AMC M.A.602 and AMC M.A.702) or an equivalent that is acceptable to the competent authority.

The EASA Form 2 is valid for the application for M.A. Subpart F, M.A. Subpart G, Part-CAO, Part-145 and Part-CAMO organisations. Organisations that apply for several approvals may do so by using a single EASA Form 2.

### GM1 CAO.A.020 Terms of approval

#### SCOPE OF WORK

In the combined airworthiness exposition (CAE), the detailed scope of work of the organisation should indicate at least:

- (a) For aeroplanes above 2 730 kg MTOM:
  - The particular aircraft types included (the use of the list of type ratings contained in the Appendix IX to AMC to Part-66 is acceptable).
- (b) For aeroplanes up to 2 730 kg MTOM:
  - The type of propulsion (turbine engine, piston engine)
  - The category (ELA1, ELA2, up to 2 730 kg)
- (c) For helicopters above 1 200 kg MTOM and 4 occupants:
  - The particular aircraft types included (the use of the list of type ratings contained in the Appendix I to AMC to Part-66 is acceptable).
- (d) For helicopters up to 1 200 kg MTOM and 4 occupants:
  - The type of propulsion (turbine engine, piston engine)
- (e) For sailplanes:
  - ELA1
- (f) For balloons:
  - Hot-air balloons
  - Gas-balloons
  - Roziere balloons



(g) For airships:

- The particular airship type for those which are not classified as ELA2
- For ELA2 airships whether it covers hot-air airships or gas-airships

## GM1 CAO.A.020(a) Terms of approval

### EXAMPLES OF CHANGE TO SCOPE OF WORK

In the case of helicopter Bell 206B model (above 1 200 kg MTOM) in the scope of work, adding Bell 206L model to the scope of work would require approval by the competent authority in accordance with point CAO.A.020(a)(1).

if the scope of work contains the Rotax 912 A Series complete piston engine, the CAO shall control changes to the scope of work for additional complete piston engines (e.g. Rotax 914 series or LOM M 332 Series) in accordance with CAO.A.105(b) through an approved procedure.

## AMC1 CAO.A.020(c) Terms of approval

### FABRICATION

- (a) The agreement by the competent authority for the fabrication of parts by the maintenance organisation should be formalised through the approval of a detailed procedure in the CAE. 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 approved maintenance organisation.
- (c) The approved data necessary to fabricate the part are those approved by either the Agency, the TC holder, Part 21 design organisation approval holder, or STC holder.
- (d) Items fabricated by an approved maintenance organisation may only be used by that organisation in the course of overhaul, maintenance, modifications, or repair of aircraft or components undergoing work within its own facility. The permission to fabricate does not constitute approval for manufacture, or to supply externally and the parts do not qualify for certification on EASA Form 1. This also applies to the bulk transfer or 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 under a CAO approval.
- (f) The data specified in point (c) may include repair procedures involving the fabrication of parts. Where the data on such parts is sufficient to facilitate fabrication, the parts may be fabricated by an approved maintenance organisation. Care should be taken to ensure that the data includes details of part numbering, dimensions, materials, processes, and any special manufacturing techniques, special raw material specification or/and incoming inspection requirement and that the approved organisation has the necessary capability. That capability should be defined within the CAE. Where special processes or inspection procedures are defined in the approved data, which are not available at the approved maintenance



organisation, that organisation cannot fabricate the part unless the TC/STC holder gives an approved alternative.

(g) Examples of fabrication under the scope of a CAO approval can 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; and
- (6) formed or machined sheet metal panels for repairs.

It is not acceptable to fabricate any item to pattern unless an engineering drawing of the item is produced which includes any necessary fabrication processes and which is accepted 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 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 a CAO approval unless agreed otherwise by the competent authority in accordance with a procedure specified in the CAE.

(i) Inspection and identification

Any locally fabricated part should be subject to an inspection stage 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 the final inspections. All parts, except those with inadequate space, should carry a part number which clearly relates it to the manufacturing/inspection data. Additional to the part number, the approved maintenance organisation's identity should be marked on the part for traceability purposes.

## AMC1 CAO.A.025 Combined airworthiness exposition (CAE)

This AMC provides an outline of the layout of an acceptable CAE.

Chapter	Description	Implementing rule reference
PART A — GENERAL DESCRIPTION		
A.1	Statement by accountable manager	CAO.A.025(a)(1); CAO.A.035(a)
A.2	General presentation of the organisation	CAO.A.035(a); CAO.A.100(e)
A.3	Description and location of the facilities	CAO.A.025(a)(9); CAO.A.030
A.4	Scope of work	CAO.A.020(a); CAO.A.025(a)(2); CAO.A.095(e); Appendix I point (a)



Chapter	Description	Implementing rule reference
A.5	Exposition amendments and changes to the organisation	CAO.A.025(a)(11)/(c); CAO.A.105
A.6	Procedure for alternative means of compliance	CAO.A.017
A.7	Management personnel	CAO.A.025(a)(3); CAO.A.035(b); CAO.A.100(a)
A.8	Organisation chart	CAO.A.025(a)(4)
A.9	Manpower resources	CAO.A.035(d)
A.10	List of certifying staff	CAO.A.025(a)(5)
A.11	List of staff responsible for the development and approval of the AMP	CAO.A.025(a)(6)
A.12	List of airworthiness review staff	CAO.A.025(a)(7); CAO.A.045(d)
A.13	List of staff responsible for the issuance of permits to fly	CAO.A.025(a)(8)
<b>PART B — GENERAL PROCEDURES</b>		
B.1	Quality (or organisational review) system	CAO.A.100(a)/(b)/(d)/(e)/(f)
B.2	Audit plan (or frequency and content of organisational review)	CAO.A.100(b)/(f)
B.3	Monitoring of maintenance contracts	CAO.A.100(b)(2)
B.4	Qualification, assessment and training of staff	CAO.A.035(c)/(d)/(e)/(f); CAO.A.040(a); CAO.A.045(a)/(b)/(c); CAO.A.060(a)
B.5	One-off certification authorisation	CAO.A.040(b)
B.6	Limited certification authorisation	CAO.A.040(c)
B.7	Subcontracting	CAO.A.095(a)(2)/(b)(3); CAO.A.100(f)
B.8	Maintenance data and continuing airworthiness management data	CAO.A.055(a); CAO.A.080
B.9	Records management and retention	CAO.A.035(e); CAO.A.040(d); CAO.A.045(e); CAO.A.050(b); CAO.A.060(j); CAO.A.075(a)/(b)(9); CAO.A.090; CAO.A.100(c); CAO.A.085
B.10	Carrying out the airworthiness review	CAO.A.085; CAO.A.095(c)
B.11	Conformity with approved flight conditions	CAO.A.095(d)
B.12	Issue of the permit to fly	CAO.A.095(d); CAO.A.045(a)
<b>PART C — MAINTENANCE PROCEDURES</b>		
C.1	Maintenance — general	CAO.A.025(10)
C.2	Work order acceptance	CAO.A.055(b)
C.3	Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration, etc.)	CAO.A.050; CAO.A.060(d); CAO.A.030(b)
C.4	Maintenance facility (selection, organisation, cleanliness and environmental limitations)	CAO.A.060(b)/(e)/(f)
C.5	Maintenance accomplishment and maintenance standards	CAO.A.095(a)(1); CAO.A.060(c); Appendix I points (b)/(c)/(d)
C.6	Prevention of maintenance error	CAO.A.060(g)/(i)
C.7	Critical maintenance tasks and error-capturing method	CAO.A.060(h)
C.8	Fabrication	CAO.A.020(c)
C.9	Certifying staff responsibilities and maintenance release	CAO.A.040(a); CAO.A.065; CAO.A.070; CAO.A.095(a)(4)
C.10	Defects arising during maintenance	CAO.A.075(b)(6)



Chapter	Description	Implementing rule reference
C.11	Maintenance away from approved location	CAO.A.095(a)(3)
C.12	Procedure for component maintenance under aircraft or engine rating	Appendix I point (b)/(c)
C.13	Procedure for maintenance on installed engine (or component) under engine (or component) rating	Appendix I point (c)/(d)
C.14	Special procedures (specialised tasks, non-destructive testing (NDT), engine running, etc.)	CAO.A.030(a); Appendix I point (e)
C.15	Issue of ARC under maintenance privilege	CAO.A.095(c)(2)
<b>PART D — CONTINUING AIRWORTHINESS MANAGEMENT PROCEDURES</b>		
D.1	Continuing airworthiness management — general	CAO.A.025(10); CAO.A.095(b)(1); CAO.A.075(a)/(b)(7)/(b)(9)
D.2	Minimum equipment list (MEL) (and configuration deviation list (CDL)) application	CAO.A.075(a)
D.3	AMP development, control and periodic review	CAO.A.075(a)/(b)(1)/(b)(2); CAO.A.095(b)(2)
D.4	Airworthiness directives and other mandatory airworthiness requirements	CAO.A.075(a)/(b)(5)/(b)(8)
D.5	Modifications and repairs	CAO.A.075(b)(3)
D.6	Pre-flight inspection	CAO.A.075(a)
D.7	Defects	CAO.A.075(b)(6)
D.8	Establishment of contracts and work orders for the maintenance	CAO.A.075(a)/(b)(4)/(b)(7)
D.9	Coordination of maintenance activities	CAO.A.075(b)(8)
D.10	Mass and balance statement	CAO.A.075(a)/(b)(10)
D.11	Issue of ARC or ARC recommendation	CAO.A.095(c)(1)(i)
D.12	ARC extension	CAO.A.095(b)(4)/(c)(1)(ii)
D.13	Maintenance check flights	CAO.A.075(a)
<b>PART E — SUPPORTING DOCUMENTS</b>		
E.1	Sample documents	
E.2	List of subcontracted organisations	
E.3	List of organisations contracted by the CAO	
E.4	Aircraft technical log system (if applicable)	
E.5	List of the currently approved alternative means of compliance	
E.6	Copy of contracts for subcontracted continuing airworthiness tasks	

## AMC1 CAO.A.030 Facilities

- (a) Where a 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 maintenance should be demonstrated by the preparation of a projected aircraft hangar visit plan relative to the AMP. The aircraft hangar visit plan should be updated on a regular basis.
- (b) For balloons and airships, a hangar may not be required where maintenance of the envelope and bottom end equipment can more appropriately be performed outside, providing all necessary maintenance can be accomplished in accordance with ML.A.402. For complex repairs



or component maintenance requiring an EASA Form 1, suitable approved workshops should be provided. The facilities and environmental conditions required for inspection and maintenance should be defined in the CAE.

- (c) Depending on the scope of work of the maintenance organisation, it may not be necessary to have a hangar available. For example, an organisation maintaining aircraft to which Part-ML applies (when not performing major repairs) may perform the work in alternative suitable facilities (and possibly at remote locations) as agreed by the competent authority.
- (d) Protection from the weather elements relates to the normal prevailing local weather elements that are expected throughout any twelve-month period. Aircraft hangar and aircraft component workshop structures should be to a standard that prevents the ingress of rain, hail, ice, snow, wind and dust, etc. Aircraft hangar and aircraft component workshop floors should be sealed to minimise dust generation.
- (e) Aircraft maintenance staff should be provided with an area where they may study maintenance instructions and complete continuing airworthiness records in a proper manner.
- (f) Special case for aircraft to which Part-ML applies:
  - (1) It is acceptable not to have access to a hangar or dedicated workshops. Depending on the scope of work, other facilities are acceptable as long as protection is ensured from inclement weather and contamination. This may include, for example, working in the field or in non-aviation premises (closed or not).
  - (2) These facilities do not need to be individually approved by the competent authority as long as the CAE describes for each type of facility the scope of work, the tooling and equipment available, and the permitted environmental conditions (weather, contamination).
  - (3) The organisation should include, as part of the quality system/organisational review, a sampling of the compliance with these conditions during certain maintenance events.
- (g) 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 assigned tasks.
- (h) Storage facilities for serviceable aircraft components should be clean, well ventilated and maintained at an even dry temperature to minimise the effects of condensation. The manufacturer's storage recommendations should be followed for those aircraft components identified in such published recommendations.
- (i) Adequate storage racks should be provided and strong enough to hold aircraft components and provide sufficient support for large aircraft components such that the component is not damaged during storage.
- (j) All aircraft components, wherever practicable, should remain packaged in their protective material to minimise damage and corrosion during storage. A shelf life control system should be utilised and identity tags used to identify components.
- (k) Segregation means storing unserviceable components in a separate secured location from serviceable components.



- (l) Segregation and management of any unserviceable component should be ensured according to the pertinent procedure approved to that organisation.
- (m) Procedures should be defined by the organisation describing the decision process for the status of unserviceable components. This procedure should identify at least the following:
  - (1) role and responsibilities of the persons managing the decision process;
  - (2) description of the decision process to choose between maintaining, storing or mutilating a component; and
  - (3) traceability of decision.
- (n) Once unserviceable components or materials have been identified as unsalvageable in accordance with M.A.501(a)(3) or ML.A.504(c), the organisation should establish secure areas in which to segregate such items and to prevent unauthorised access. Unsalvageable components should be managed through a procedure to ensure that these components receive the appropriate final disposal according to M.A.504(b) or ML.A.504(d) or (e). The person responsible for the implementation of this procedure should be identified.

## AMC1 CAO.A.045 Airworthiness review staff

- (a) Airworthiness review staff already authorised to perform airworthiness review for an organisation approved in accordance Part-M Subpart F, Part-CAMO or Part-145 is considered to be authorised in accordance with Part-CAO when such organisation applies for a Part-CAO approval. This means that no additional supervision is needed to be authorised to be accepted to continue carrying out airworthiness reviews. This does not supersede the requirement for the organisation to ensure that all personnel is competent for the job they are authorised.
- (b) 'Experience in continuing airworthiness' in CAO.A.045(a) means any appropriate combination of experience in tasks related to aircraft maintenance and/or continuing airworthiness management and/or surveillance of such tasks.
- (c) 'Appropriate recent continuing airworthiness experience' in CAO.A.045(c) means 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 six months in every two-year period; or
  - (2) conducted at least one airworthiness review in the last twelve-month period.
- (d) 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 valid authorised airworthiness review staff of the CAO concerned in accordance with an approved procedure.
- (e) A person that holds a relevant engineering degree or an aircraft maintenance technician qualification with additional education should be considered as holding the equivalent to an aeronautical degree. 'Relevant engineering degree' means an engineering degree from



mechanical, electrical, electronic, avionic or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components.

## AMC1 CAO.A.050(a) Components, equipment and tools

- (a) The tools 'necessary for day-to-day maintenance' means those needed to perform standard maintenance practices plus those needed in order to complete the normal servicing tasks as well as those needed up to the annual/100-hour or equivalent inspections and which are common to the majority of aircraft contained in the scope of approval.
- (b) The availability of tools rarely used because the particular maintenance task is very rarely performed can be handled through a procedure in accordance with CAO.A.050(a)(2).

## AMC1 CAO.A.055 Maintenance data and work orders

It is not required to continuously hold all the maintenance data. It is acceptable to have a procedure to ensure that the specific maintenance data required for a particular maintenance activity will be available before that maintenance takes place.

## AMC1 CAO.A.060(g) Maintenance standards

- (a) To minimise the risk of errors and to prevent omissions, the approved CAO when performing maintenance should ensure that:
  - (1) every maintenance task is signed off only after completion;
  - (2) the grouping of tasks for the purpose of sign-off allows critical steps to be clearly identified; and
  - (3) any work performed by personnel under supervision (i.e. temporary staff, trainees) is checked and signed off by an authorised person.
- (b) To minimise the possibility of an error being repeated in identical tasks that involve removal/installation or assembly/disassembly of several components of the same type fitted to more than one system, whose failure could have an impact on safety, the approved CAO when performing maintenance should plan different persons to perform identical tasks in different systems. However, when only one person is available, then this person should perform reinspection of the tasks as described in AMC2 CAO.A.060(h).

## AMC1 CAO.A.060(h) Maintenance standards

### CRITICAL MAINTENANCE TASKS

The following maintenance tasks should primarily be reviewed to assess their impact on safety:

- (a) tasks that may affect the control of the aircraft's flight path and attitude, such as the installation, rigging and adjustments of flight controls;
- (b) tasks that may affect aircraft stability control systems (autopilots, fuel transfer);



- (c) tasks that may affect the propulsive force of the aircraft, including the installation of aircraft engines, propellers and rotors; and
- (d) the overhaul, calibration or rigging of engines, propellers, transmissions and gearboxes.

## AMC2 CAO.A.060(h) Maintenance standards

### 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 assumes 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 to the satisfactory completion of the task, and that no deficiencies have been found. The 'independent qualified person' does not issue a CRS; therefore, he or she is not required to hold certification privileges;
- (3) the CRS is issued by the 'authorised person' after the independent inspection has been carried out satisfactorily; and
- (4) the work card system should record the identification of each person, the date and the details of the independent inspection, as necessary, before the CRS is issued.

#### (b) Qualifications of personnel 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 control systems to be inspected. This training and experience could be demonstrated, for example, by:

- (i) holding a Part-66 licence in the same subcategory as the licence subcategory or equivalent necessary to release or sign off the critical maintenance task;
- (ii) holding a Part-66 licence in the same category and specific training in the task to be inspected; or
- (iii) having received appropriate training and having gained relevant experience in the specific task to be inspected.

#### (c) How to perform an independent inspection

The independent inspection should ensure for example the correct assembly, locking and sense of operation of the parts involved. 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 their 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 operate 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, its version and its compatibility with the aircraft configuration.

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

#### REINSPECTION

- (1) Reinspection is subject to the same conditions as the independent inspection is, except that the 'authorised person' performing the maintenance task is also acting as 'independent qualified person' and performs the inspection.
- (2) For critical maintenance tasks, reinspection should only be used in unforeseen circumstances when only one person is available to carry out the task and perform the independent inspection. The circumstances cannot be considered to be unforeseen if the person or organisation has not assigned a suitable 'independent qualified person' to that particular task.
- (3) The CRS is issued by the 'authorised person' after the reinspection has been performed satisfactorily.
- (4) The work card system should record the identification of the 'authorised person' and the date and the details of the reinspection, as necessary, before the CRS is issued.

## GM1 CAO.A.070 Component certificate of release to service

### COMPONENTS MAINTAINED BY CAO

Appendix II to Part-M, point (5), blocks 12 and 14a describe how the component maintenance release is formalised by the CAO on the EASA Form 1.

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 licenced in accordance with Regulation (EC) No 1008/2008.

## AMC1 CAO.A.070(a) Component certificate of release to service

1. An aircraft component which has been maintained off the aircraft requires the issuance of a CRS for such maintenance and another CRS in regard to being installed properly on the aircraft when such installation 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 CAE.

2. In the case of components in storage prior to Part-145, Part-M and Part 21 and not released on an EASA Form 1 or equivalent in accordance with M.A.501(a)(1) or ML.A.501(a), or removed serviceable from a serviceable aircraft or from 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, or Part-M 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 Part-CAO maintenance organisation may issue an EASA Form 1 as detailed in points 2.5 to 2.9, as appropriate, in accordance with the procedures detailed in the CAE as approved by the competent authority. The appropriately rated Part-CAO maintenance organisation is responsible for ensuring that all reasonable measures have been taken to ensure that only approved and serviceable aircraft components are issued with an EASA Form 1 under this point 2.
  - 2.3. For the purposes of this point 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 point 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 ADs, repairs and modifications known to have been incorporated. If no ADs or repairs or modifications are known to be incorporated, then this should be so stated;
    - 2.4.4. detail of life used for service life-limited parts 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 the time may be issued an EASA Form 1 by an appropriately rated maintenance organisation approved under Part-CAO. The EASA Form 1 should be issued in accordance with the following points, which should be included in a procedure within the CAE.

Note 1: It should be understood that the release of a stored but unused aircraft component in accordance with this point represents a maintenance release under Part-CAO 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 subject 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 point 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 ADs, 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 replaced. Upon satisfactory completion after reassembly, an EASA Form 1 may be issued stating what was carried out and the reference to 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 an EASA Form 1 by an appropriately rated organisation subject to compliance with this point 2.6.1.

- (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 or 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 point 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 service life-limited parts including time since overhaul should be established.
- (h) Compliance with known applicable airworthiness directives should be established.
- (i) Subject to satisfactory compliance with this point 2.6.1, an EASA Form 1 may be issued and should contain the information as specified in point 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 an EASA Form 1 if the components are leased or loaned from the maintenance organisation approved under Part-CAO that retains control of the airworthiness status of the components. An EASA Form 1 may be issued and should contain the information as specified in point 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 an EASA Form 1 by a maintenance organisation approved under Part-CAO subject to compliance with this point 2.7.

- (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-CAO, 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 points 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-CAO.
- (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-CAO 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-M Subpart F, Part-CAO or Part-145

For used components maintained by a maintenance organisation not approved under Part-M Subpart F, Part-CAO or Part-145, due care should be taken before acceptance of such components. In such cases, an appropriately rated maintenance organisation approved under Part-CAO should establish satisfactory conditions by:

- (a) dismantling the component for sufficient inspection in accordance with the appropriate maintenance data;
- (b) replacing of all service life-limited 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; and
- (d) completing all certification requirements as specified in CAO.A.070.



In the case of used components maintained by an FAA Part-145 repair station (USA) or by TCCA CAR573 approved maintenance organisations (Canada) that does not hold an EASA Part-145, Part-CAO or Part-M Subpart F approval, the conditions (a) through (d) described above may be replaced by the following conditions:

- (a) availability of a Form 8130-3 (FAA) or TCCA 24-0078 (TCCA) or an Authorized Release Certificate Form One (TCCA);
- (b) verification of compliance with all applicable airworthiness directives;
- (c) verification that the component does not contain repairs or modifications that have not been approved in accordance with Part 21;
- (d) inspection for satisfactory condition including in particular damage, corrosion or leakage; and
- (e) issuance of an EASA Form 1 in compliance with points 2.2, 2.3 and 2.4.

These alleviated requirements are based on the fact that credit can be taken for their technical capabilities and their competent authority oversight, as attested by the following documents:

- Maintenance Annex Guidance (MAG) between the FAA and EASA
- Maintenance Annex Guidance (MAG) between the EASA and TCCA

#### 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 point 2.7 and a specific work order including all additional necessary tests and inspections made 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.

3. A certificate should not be issued for any component when it is known that the component is unserviceable except in the case of a component undergoing a series of maintenance processes at several approved maintenance organisations and the component needs a certificate for the previous maintenance process carried out for the next approved maintenance organisation to accept the component for subsequent maintenance processes. In such a case, a clear statement of limitation should be endorsed in block 12.
4. The certificate is to be used for export/import purposes, as well as for domestic purposes, and serves as an official certificate for components from the manufacturer/maintenance organisation to users. It should only be issued by organisations approved by a competent authority or the Agency as applicable within the scope of the approval.

### AMC1 CAO.A.080 Continuing airworthiness management data

When there is no contract yet for continuing airworthiness management, there is no need to hold the current continuing airworthiness management data.



## GM1 CAO.A.095 Privileges of the organisation

A CAO can be approved to perform airworthiness reviews although it does not hold the privileges of continuing airworthiness management (for aircraft to which Part-ML is applicable). This means that the certificate will show the boxes 'maintenance' and 'airworthiness reviews' ticked.

### AMC1 CAO.A.095(b)(3) Privileges of the organisation

#### SUBCONTRACTING OF CONTINUING AIRWORTHINESS TASKS

- (a) The CAO may subcontract certain continuing airworthiness management tasks to qualified organisations. The subcontracted organisation performs the continuing airworthiness management tasks as an integral part of the CAO quality system, irrespective of any other approval held by the subcontracted organisation (including CAMO, CAO or Part-145 approval).
- (b) The CAO remains accountable for the satisfactory completion of the continuing airworthiness management tasks irrespective of any contract that may be established.
- (c) In order to fulfil this responsibility, the CAO should be satisfied that the actions taken by the subcontracted organisation meet the standards required by Part-CAO. Therefore, the CAO management of such activities should be accomplished by:
  - (1) active control through direct involvement; and/or
  - (2) endorsing the recommendations made by the subcontracted organisation.
- (d) In order to retain ultimate responsibility, the CAO should limit subcontracted tasks to the activities specified below:
  - (3) airworthiness directive analysis and planning;
  - (4) service bulletin analysis;
  - (5) planning of maintenance;
  - (6) reliability monitoring, engine health monitoring;
  - (7) maintenance programme development and amendments; and
  - (8) any other activities, which do not limit the CAO responsibilities, as agreed by the competent authority.
- (e) The CAO's controls associated with subcontracted continuing airworthiness management tasks should be reflected in the associated contract and be in accordance with the CAO policy and procedures defined in the CAE. When such tasks are subcontracted, the quality system is considered to be extended to the subcontracted organisations.
- (f) With the exception of engines and auxiliary power units, contracts would normally be limited to one organisation per aircraft type for any combination of the subcontracted activities. Where contracts are made with more than one organisation, the CAO should demonstrate that adequate coordination controls are in place and that the individuals' responsibilities are clearly defined in the related contracts.



- (g) Contracts should not authorise the subcontracted organisation to subcontract elements of the continuing airworthiness management tasks to other organisations.
- (h) The competent authority should exercise oversight of the subcontracted activities through the CAO approval. The contracts should be acceptable to the competent authority. The CAO should only subcontract to organisations which are specified by the competent authority on EASA Form 3-CAO (page 2, block titled 'List of organisation(s) working under a quality system').
- (i) The subcontracted organisation should agree to notify the CAO of any changes affecting the contract as soon as practical. The CAO should then inform its competent authority. Failure to do so may invalidate the competent authority's acceptance of the contract.
- (j) Appendix II to AMC1 CAMO.A.125(d)(3) provides information on the subcontracting of continuing airworthiness management tasks by the CAMO. The same principles may be applied to the CAO.

## GM1 CAO.A.100(a) Quality system and organisational review

### QUALITY SYSTEM — GENERAL

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

## AMC2 CAO.A.100(a) Quality system and organisational review

### QUALITY SYSTEM — FEEDBACK

- (a) The quality system should include a feedback system: it should ensure that all findings resulting from the independent audits are properly investigated and corrected in a timely manner. It should address who is required to rectify each non-compliance and the procedure to be followed if rectification is not completed within appropriate timescales. The procedure should enable the accountable manager to be kept informed of any safety issues and the extent of compliance with Part-CAO.
- (b) The audit reports referenced in AMC1 CAO.A.100(b) should be sent to the relevant department for rectification action giving target rectification dates. Rectification dates should be discussed with such department before the quality department or nominated auditor confirms such dates in the report. The relevant department is required to rectify findings and inform the quality manager or the auditor of such rectification.
- (c) The accountable manager should hold regular meetings with staff to check the progress of any corrective actions. If these meetings are delegated to the quality manager on a day-to-day basis, then the accountable manager should:



- (1) meet the senior staff involved at least twice per year to review the overall performance of the compliance monitoring function; and
- (2) receive at least a half-yearly summary report on non-compliance findings.

## AMC1 CAO.A.100(b) Quality system and organisational review

### QUALITY SYSTEM — INDEPENDENT AUDIT

- (a) An essential element of the quality system 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 continuing airworthiness management and/or maintenance to the standards required by Regulation (EU) No 1321/2014. It should include some product sampling (e.g. product audit) as this is the end result of the process.
- (c) The independent audit should provide an objective overview of the complete set of continuing airworthiness management and/or maintenance related activities.
- (d) The organisation should establish an audit plan to show when and how often the activities as required by Regulation (EU) No 1321/2014 will be audited.
- (e) The audit plan should ensure that all aspects of Part-CAO compliance are verified every year, including all the subcontracted activities, and the auditing may be carried out as a complete single exercise or (sub)divided 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, the particular procedure should be verified against other product lines until the findings have been rectified, after which the independent audit procedure may revert to a 1-year interval for the particular procedure.
- (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 agreement by the competent authority.
- (g) Where the organisation has more than one location approved, the quality system should include a description of how these locations are integrated into the system, and include a plan to audit each location at a frequency consistent with the extent of activity at the particular location, not exceeding 2 years.
- (h) A report should be issued each time an audit is carried out describing what was checked and the resulting non-compliance findings against applicable requirements and procedures.

## GM1 CAO.A.100(e) Quality system and organisational review

An organisation that holds both maintenance and continuing airworthiness management privileges can be considered to be at the same time:

- a small CAO for one privilege; and
- not a small CAO for the other privilege.



In these situations, the organisation is not considered to be a small CAO as a whole.

## AMC1 CAO.A.100(f) Quality system and organisational review

### ORGANISATIONAL REVIEW

- (a) The primary objectives of organisational review are to provide a monitoring function on how the organisation ensures compliance with the applicable requirements, policies and procedures, and to request actions where non-compliances are identified.
- (b) The CAO should identify the:
  - (1) person responsible for the organisational review;
  - (2) frequency of the reviews;
  - (3) scope and content of the reviews;
  - (4) persons accomplishing the reviews;
  - (5) procedure for planning, performing and processing review findings; and
  - (6) procedure for ensuring corrective actions are carried out in the appropriate time frame.
- (c) Appendix II to AMC1 CAO.A.100(f) should be used to manage the organisational reviews.
- (d) The following continuing airworthiness management activities should not be considered to be subcontracting and, as a consequence, they may be performed without a quality system, although they need to be described in the CAE and be approved by the competent authority:
  - (1) Subscription to a technical publisher that provides maintenance data (aircraft maintenance manuals, illustrated parts catalogues, service bulletins, etc.).
  - (2) Contracting the use of a software tool for the management of CAO.A.080 continuing airworthiness data and CAO.A.090 records, provided that:
    - (i) if the tool is used by several organisations, each organisation has access to its own data only;
    - (ii) introduction of data can only be performed by personnel of the CAO; and
    - (iii) the data can be retrieved at any time.



## SECTION B

### AUTHORITY REQUIREMENTS

#### GM1 CAO.B.017 Means of compliance

##### ALTERNATIVE MEANS OF COMPLIANCE

Alternative means of compliance that are used by an organisation, may be used by another organisation only if they are processed again in accordance with point CAO.B.017(d).

#### GM1 CAO.B.045(a) Initial approval

##### FORMAL ACCEPTANCE OF MANAGEMENT STAFF

The approval by the competent authority of the CAE, containing in accordance with CAO.A.025(a)(3) the nominative list of CAO.A.035(a) and (b) persons, constitutes the formal notification of acceptance by the competent authority of this personnel.

#### AMC1 CAO.B.045 Initial approval

The organisation is not required to continuously hold all the maintenance data. It is acceptable to have a procedure to ensure that the specific maintenance data required for a particular maintenance activity will be available before that maintenance takes place.

However, the organisation should be able to demonstrate its maintenance capability and find means to comply with CAO.A.050(a) when it does not hold all current applicable maintenance data before the approval.

#### AMC1 CAO.B.045(c) Initial approval

The EASA Form 6-CAO should be used for this activity (see Appendix I to AMC CAO.B.045(c) and CAO.B.055(b)).

#### AMC1 CAO.B.055 Continuing oversight

At the successful conclusion of the audit(s), including verification of the CAE, an audit report form should be completed by the auditing surveyor including all recorded findings, closure actions and recommendation. An EASA Form 6-CAO should be used for this activity (see Appendix I to AMC CAO.B.045(c) and CAO.B.055(b)).



A review of the EASA Form 6-CAO audit report form should be carried out by a competent independent person nominated by the competent authority. Satisfactory review of the audit form should be indicated by a signature on the audit form.



## APPENDICES TO AMC AND GM TO PART-CAO

### Appendix I to AMC1 CAO.B.045(c) and AMC1 CAO.B.055 — EASA Form 6-CAO

Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 6-CAO
Part 1: General		
Name of organisation:		
Approval reference:		
Requested approval rating:		
EASA Form 3-CAO dated*:		
Other approvals held (if applicable)		
Address of facility audited:		
Audit period: from		to
Date(s) of audit(s):		
Audit reference(s):		
Persons interviewed:		
Competent authority inspector(s):		Signature(s):
Competent authority office:		Date of EASA Form 6-CAO Part 1 completion:
*delete where applicable		



Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 6-CAO				
<b>Part 2: Part-CAO Compliance audit review</b>						
Point	Subject					
CAO.A.017	Means of compliance	<input type="checkbox"/>				
CAO.A.020	Terms of approval	<input type="checkbox"/>				
CAO.A.025	Combined airworthiness exposition (see Part 3)	<input type="checkbox"/>				
CAO.A.030	Facilities	<input type="checkbox"/>				
CAO.A.035	Personnel requirements	<input type="checkbox"/>				
CAO.A.040	Certifying staff	<input type="checkbox"/>				
CAO.A.045	Airworthiness review staff	<input type="checkbox"/>				
CAO.A.050	Components, equipment and tools	<input type="checkbox"/>				
CAO.A.055	Maintenance data and work orders	<input type="checkbox"/>				
CAO.A.060	Maintenance standards	<input type="checkbox"/>				
CAO.A.065	Aircraft certificate of release to service	<input type="checkbox"/>				
CAO.A.070	Component certificate of release to service	<input type="checkbox"/>				
CAO.A.075	Continuing-airworthiness management	<input type="checkbox"/>				
CAO.A.080	Continuing-airworthiness management data	<input type="checkbox"/>				
CAO.A.085	Airworthiness review	<input type="checkbox"/>				
CAO.A.090	Record-keeping	<input type="checkbox"/>				
CAO.A.095	Privileges of the organisation	<input type="checkbox"/>				
CAO.A.100	Quality system and organisational review	<input type="checkbox"/>				
CAO.A.105	Changes to the organisation	<input type="checkbox"/>				



Competent authority inspector(s):

Signature(s):

Competent authority office:

Date of EASA Form 6-CAO Part 2 completion:



Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 6-CAO
Part 3: Compliance with combined airworthiness exposition (CAE) 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 if an item is not applicable; or N/R if it is applicable but it was not reviewed.		
Part A	GENERAL DESCRIPTION	
A.1	<input type="checkbox"/>	Statement by accountable manager
A.2	<input type="checkbox"/>	General presentation of the organisation
A.3	<input type="checkbox"/>	Description and location of the facilities
A.4	<input type="checkbox"/>	Scope of work
A.5	<input type="checkbox"/>	Exposition amendments and changes to the organisation
A.6	<input type="checkbox"/>	Procedure for alternative means of compliance
A.7	<input type="checkbox"/>	Management personnel
A.8	<input type="checkbox"/>	Organisation chart
A.9	<input type="checkbox"/>	Manpower resources
A.10	<input type="checkbox"/>	List of certifying staff
A.11	<input type="checkbox"/>	List of staff responsible for the development and approval of the AMP
A.12	<input type="checkbox"/>	List of airworthiness review staff
A.13	<input type="checkbox"/>	List of staff responsible for the issuance of permits to fly
Part B	GENERAL PROCEDURES	
B.1	<input type="checkbox"/>	Quality (or organisational review) system
B.2	<input type="checkbox"/>	Audit plan (or frequency and content of organisational review)
B.3	<input type="checkbox"/>	Monitoring of maintenance contracts
B.4	<input type="checkbox"/>	Qualification, assessment and training of staff
B.5	<input type="checkbox"/>	One-off certification authorisation
B.6	<input type="checkbox"/>	Limited certification authorisation
B.7	<input type="checkbox"/>	Subcontracting
B.8	<input type="checkbox"/>	Maintenance data and continuing airworthiness management data
B.9	<input type="checkbox"/>	Records management and retention
B.10	<input type="checkbox"/>	Carrying out the airworthiness review
B.11	<input type="checkbox"/>	Conformity with approved flight conditions
B.12	<input type="checkbox"/>	Issue of the permit to fly
Part C	MAINTENANCE PROCEDURES	
C.1	<input type="checkbox"/>	Maintenance — general
C.2	<input type="checkbox"/>	Work order acceptance
C.3	<input type="checkbox"/>	Components, equipment, tools and material (supply, acceptance, segregation, storage, calibration, etc.)
C.4	<input type="checkbox"/>	Maintenance facility (selection, organisation, cleanliness and environmental limitations)



Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 6-CAO
<b>Part 3: Compliance with combined airworthiness exposition (CAE)</b> 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 if an item is not applicable; or N/R if it is applicable but it was not reviewed.		
C.5		Maintenance accomplishment and maintenance standards
C.6		Prevention of maintenance error
C.7		Critical maintenance tasks and error-capturing method
C.8		Fabrication
C.9		Certifying staff responsibilities and maintenance release
C.10		Defects arising during maintenance
C.11		Maintenance away from approved location
C.12		Procedure for component maintenance under aircraft or engine rating
C.13		Procedure for maintenance on installed engine (or component) under engine (or component) rating
C.14		Special procedures (specialised tasks, NDT, engine running, etc.)
C.15		Issue of ARC under maintenance privilege
<b>Part D CONTINUING AIRWORTHINESS MANAGEMENT PROCEDURES</b>		
D.1		Continuing airworthiness management — general
D.2		MEL (and CDL) application
D.3		AMP development, control and periodic review
D.4		Airworthiness directives and other mandatory airworthiness requirements
D.5		Modifications and repairs
D.6		Pre-flight inspection
D.7		Defects
D.8		Establishment of contracts and work orders for the maintenance
D.9		Coordination of maintenance activities
D.10		Mass and balance statement
D.11		Issue of ARC or ARC recommendation
D.12		ARC extension
D.13		Maintenance check flights
<b>Part E SUPPORTING DOCUMENTS</b>		
E.1		Sample documents
E.2		List of subcontracted organisations
E.3		List of organisation contracted by the CAO
E.4		Aircraft technical log system (if applicable)
E.5		List of the currently approved alternative means of compliance
E.6		Copy of contracts for subcontracted continuing airworthiness tasks
CAE reference:		CAE amendment:



Part-CAO APPROVAL RECOMMENDATION REPORT	EASA FORM 6-CAO
Part 3: Compliance with combined airworthiness exposition (CAE) 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 if an item is not applicable; or N/R if it is applicable but it was not reviewed.	
Competent authority audit staff:	Signature(s):
Competent authority office:	Date of EASA Form 6-CAO Part 3 completion:



Part-CAO APPROVAL RECOMMENDATION REPORT		EASA FORM 6-CAO			
Part 2 or 3 ref.	Audit reference(s): Findings	Corrective action			
		L e v e l	Date due	Date closed	Reference



Part-CAO APPROVAL RECOMMENDATION REPORT	EASA FORM 6-CAO
<b>Part 5: Part-CAO approval or continued approval or change recommendation*</b>	
Name of organisation:	
Approval reference:	
Audit reference(s):	
The following Part-CAO terms of approval are recommended for this organisation:	
Or, it is recommended that the Part-CAO terms of approval specified in EASA Form 3-CAO 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-CAO review:	Date:

\*delete as appropriate



## Appendix II to AMC1 CAO.A.100(f) – Organisational review

Depending on the complexity of the small organisation (number and type of aircraft, number of different fleets, privilege to perform airworthiness reviews, etc.), the organisational review system may vary from a system using the principles and practices of a quality system (except for the requirement of independence) to a simplified system adapted to the low complexity of the organisation and the aircraft managed.

As a core minimum, the organisational review system should have the following features, which should be described in the CAE:

(a) Identification of the person responsible for the organisational review programme

By default, this person should be the accountable manager, unless he or she delegates this responsibility to (one of) the CAO.A.035(b) person(s).

(b) Identification and qualification criteria for the person(s) responsible for performing the organisational reviews

These persons should have a thorough knowledge of the regulations and of the organisation procedures. They should also have knowledge of audits, acquired through training or through experience (preferably as an auditor, but also possibly because they actively participated in several audits conducted by the competent authority).

(c) Elaboration of the organisational review programme

(1) Checklist(s) covering all items necessary to be satisfied that the organisation delivers a safe product and complies with the regulation. All procedures described in the CAE should be addressed.

(2) A schedule for the accomplishment of the checklist items. Each item should be checked at least every 12 months. The organisation may choose to conduct one full review annually or to conduct several partial reviews.

(d) Performance of organisational reviews

Each checklist item should be answered using an appropriate combination of:

- review of records, documentation, etc.
- sample check of aircraft under contract or being maintained under a work order;
- interview of personnel involved;
- review of discrepancies and internal reports (e.g. notified difficulties when using current procedures and tools, systematic deviations from procedures, etc.);
- review of complaints filed by customers.

(e) Management of findings and occurrence reports

All findings should be recorded and notified to the affected persons.

(1) All findings that lower the safety standard and seriously hazard flight safety should be immediately notified to the competent authority and all necessary actions on aircraft in service should be immediately taken.



- (2) All occurrence reports should be reviewed with the aim of continuous improvement of the system by identifying possible corrective and preventive actions. This should be done in order to find prior indicators (e.g. notified difficulties when using current procedures and tools, systematic deviations from procedures, unsafe behaviours, etc.), and dismissed alerts that, had they been recognised and appropriately managed before the event, could have resulted in the undesired event being prevented.
- (3) Corrective and preventive actions should be approved by the person responsible for the organisational review programme and implemented within a specified time frame.
- (4) Once the person responsible for the organisational review programme is satisfied that the corrective action is effective, the closure of the finding should be recorded along with a summary of the corrective action.
- (5) The accountable manager should be notified of all significant findings and, on a regular basis, of the global results of the organisational review programme.

Below is a typical example of a simplified organisational review checklist, **to be adapted as necessary to cover the CAE procedures used and the privileges held by the organisation**:

#### 1. Scope of work

- Check that all aircraft under contract are covered in the EASA Form 3-CAO.
- Check that the scope of work in the CAE is consistent with the EASA Form 3-CAO.
- Check that no work has been performed outside the scope of the EASA Form 3-CAO and the CAE.
- Is it justified to retain in the approved scope of work aircraft types for which the organisation has no longer aircraft under contract?

#### 2. Maintenance data

- Check that maintenance data to cover the aircraft in the scope of work of the CAE is present and up-to-date.
- Check that no change has been made to the maintenance data from the design approval holder (DAH) without the DAH being notified.

#### 3. Equipment and tools

- Check the availability of maintenance equipment and tools against the lists in the CAE and check if they are still appropriate with regard to the maintenance data.
- Check tools for proper calibration (sample check).

#### 4. Stores

- Do the stores meet the criteria of the CAE procedures?
- Check by sampling some items in the store for presence of proper documentation and any overdue items.

#### 5. Certification of maintenance

- Has maintenance on products and components been properly certified?
- Have implementation of modifications/repairs been carried out with appropriate approval of such modifications/repairs (sample check)?



**6. Maintenance contracted**

- Sample check of maintenance records:
  - Existence and adequacy of the work order;
  - Data received from the maintenance organisation:
    - valid CRS including any deferred maintenance;
    - list of removed and installed component and copy of the associated EASA Form 1 or equivalent.
- Obtain a copy of the current approval certificate (EASA Form 3) of the maintenance organisations contracted.

**7. Maintenance subcontracted**

- Check that subcontractors for specialised services are properly controlled by the organisation.

**8. Relations with the owners/operators — maintenance**

- Has maintenance been carried out with suitable work orders?
- When a maintenance contract has been signed with an owner/operator, have the obligations of the contracts been respected by both parties?

**9. Relations with the owners/operators – continuing airworthiness management**

- Has a contract (in accordance with Appendix I to Part-M or Appendix I to Part-ML) been signed with each external owner/operator, covering all the aircraft whose airworthiness is managed by the CAO?
- Have the owners/operators under contract fulfilled their obligations identified in the contract? As appropriate:
  - Are the pre-flight checks correctly performed? (interview of pilots)
  - Is the technical log or equivalent correctly used (record of flight hours/cycles, defects reported by the pilot, identification of what maintenance is next due, etc.)?
  - Have flights occurred with overdue maintenance or with defects not properly rectified or deferred? (sample check from the aircraft records)
  - Has maintenance been performed without notifying the CAO (sample check from the aircraft records, interview of the owner/operator)?

**10. Maintenance records**

- Have the maintenance actions been properly recorded?
- Perform a sample check of maintenance records (including EASA Form 1 or equivalent, and certificates of conformity) to ensure completeness and storage during the appropriate periods.

**11. Continuing airworthiness records**

- Perform a sample check of continuing airworthiness records to ensure completeness and storage during the appropriate periods.
- Is storage of computerised data properly ensured?



**12. Airworthiness review and permit to fly records**

- Perform a sample check of airworthiness review and permit to fly records to ensure completeness and storage during the appropriate periods.

**13. Airworthiness situation of the fleet**

- Does the continuing airworthiness status (AD, maintenance programme, life-limited components, deferred maintenance, ARC validity) show any expired items? If so, are the aircraft grounded?

**14. Aircraft maintenance programme (AMP) development and control**

- For Part-ML aircraft, ensure that the AMP has been approved by the CAO and has been subject to annual review.
- For Part-M aircraft, check that all revisions to the DAH Instructions for Continuing Airworthiness (ICA), since the last review, have been (or are planned to be) incorporated in the maintenance programme, unless otherwise approved by the competent authority.
- Has the maintenance programme taken into account all modifications or repairs?
- Have all maintenance programme amendments been approved at the right level (CAO, competent authority or indirect approval)?
- Does the status of compliance with the maintenance programme reflect the latest approved maintenance programme?
- How has the organisation managed:
  - the tolerances (variations) to the AMP intervals ?
  - the deviations from the maintenance tasks to be performed in accordance with the AMP?
- Have the deviations from the DAH ICA in the development of the AMP been properly justified and recorded?

**15. Airworthiness Directives (AD) (and other safety measures mandated by the competent authority or EASA)**

- Have all ADs issued since the last review been incorporated into the AD status?
- Does the AD status correctly reflect the AD content: applicability, compliance date, periodicity, etc.? (sample check on ADs)

**16. Modifications/repairs**

- Are all modifications/repairs listed in the corresponding status approved in accordance with M.A.304 or ML.A.304? (sample check on modifications/repairs)
- Have all the modifications/repairs which have been installed since the last review been incorporated in the corresponding status? (sample check from the aircraft/component logbooks)

**17. Personnel**

- Check that the current accountable manager and other nominated persons are correctly identified in the approved CAE.
- If the number of personnel has decreased or if the activity has increased, check that the organisation has still sufficient and adequate staff.

- Check that the qualification of all new personnel (or personnel with new functions) has been appropriately assessed.
- Check that the staff has been trained, as necessary, to cover changes in:
  - regulations;
  - competent authority publications;
  - the CAE and associated procedures;
  - the approved scope of work;
  - maintenance data (significant ADs, ICA amendments, etc.).

**18. Occurrence reporting procedures**

- Check that reporting is properly performed, actions taken and recorded.

**19. Airworthiness review**

- Have airworthiness reviews been properly performed and the airworthiness review certificate properly been issued?



#### 4. Proposed actions to support implementation

In parallel to the development of AMC & GM to Part-ML and Part-CAO, EASA is also working on a guidance paper to support the industry and competent authorities in transitioning:

- (a) from Part-M Subpart F, Part-145 or Part-M Subpart G to Part-CAO;
- (b) from Part-M Subpart G to Part-CAMO.

This guidance paper will be published on EASA website.

EASA is also preparing a consolidated book of implementing rules with the new Part-ML, Part-CAO, Part-CAMO and the other annexes amended by Regulation (EU) 2019/1383, applicable as of 24 March 2020. This document will be under the 'Easy Access Rules' format and available for download on the EASA website. This will be followed by the classic 'Easy Access Rules' document, which will include the AMC & GM, once the related Decision will be issued.



## 5. References

### 5.1. Related regulations

- Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1)

### 5.2. Related decisions

- ED Decision 2015/029/R of 17 December 2015 issuing acceptable means of compliance and guidance material to Part-M, Part-145, Part-66, and Part-147 of Regulation (EU) No 1321/2014 and repealing Decision 2003/19/RM of the Executive Director of the Agency of 28 November 2003 'AMC and GM to the Annexes to Regulation (EU) No 1321/2014 — Issue 2'

### 5.3. Other reference documents

- Opinion No 05/2016 of 13 April 2016 'Task force for the review of Part-M for General Aviation (PHASE II)'
- Opinion No 06/2016 of 12 May 2016 'Embodiment of safety management system (SMS) requirements into Commission Regulation (EU) No 1321/2014 — SMS in Part-M'



## 6. Appendix

### 6.1. List and rationale for the AMC and GM to Part-ML

Reference	Subject/rationale
SECTION A — TECHNICAL REQUIREMENTS	
GM1 ML.A.201 Responsibilities	Summary of Part-ML main provisions and alleviations
GM2 ML.A.201(e) Responsibilities	Guidance on commercial ATO/DTO based on industry practice
GM1 ML.A.201(f) Responsibilities	Owner responsibility, based on GM M.A.201(i)
AMC1 ML.A.202 Occurrence Reporting	Relation with design approval holder, based on AMC M.A.202(a) and AMC M.A.202(b)
GM1 ML.A.301(f) Responsibilities	Guidance on MCFs based on draft GM M.A.301(8) proposed in Opinion No 01/2017 for Part-M
AMC1 ML.A.302 Aircraft maintenance programme	AMP format and review, based on AMC M.A.302(h)
AMC2 ML.A.302 Aircraft maintenance programme	EASA Form AMP (built upon AMC M.A.302(e))
GM1 ML.A.302 Aircraft maintenance programme	AMP responsibilities, based on GM M.A.302(h)
GM2 ML.A.302 Aircraft maintenance programme	Summary of the provisions contained in ML.A.302
AMC1 ML.A.302(c) Aircraft maintenance programme	Aspects to be considered in a risk-based approach to extension of time between overhaul (TBO) intervals
GM1 ML.A.302(c)(2)(b) Aircraft maintenance programme	Guidance on DAH and DAH ICA
GM1 ML.A.302(c)(3) Aircraft maintenance programme	Guidance on how to approach alternatives maintenance actions in the development of the AMP
GM1 ML.A.302(c)(4) Aircraft maintenance programme	Guidance on the term 'Mandatory continuing airworthiness information' used for the AMP development
AMC1 ML.A.302(d) Aircraft maintenance programme	Detailed acceptable MIP for: — aeroplanes of 2 730 kg MTOM and below — ELA2 sailplanes and ELA2 powered sailplanes — ELA2 hot-air balloons
GM1 ML.A.302(d)(2) Aircraft maintenance programme	Guidance on operational and functional tests referred to in the MIP
AMC1 ML.A.302(d)(2)(d) Aircraft maintenance programme	Acceptability of transponder test carried out in accordance with EASA SIB 2011-15 or US Title 14 CFR Part 43 Appendix F
GM1 ML.A.302(e) Aircraft maintenance programme	Guidance on how to approach pilot-owner maintenance when an AMP document is not produced
AMC1 ML.A.305 Aircraft continuing airworthiness record system	Record format and AD status



AMC1 ML.A.402 Performance of maintenance	Examples of acceptable methods to record and document the maintenance performed. Point (b) based on AMC M.A.402(e).
AMC1 ML.A.403 Aircraft defects	Assessment of defect by the pilot
GM1 ML.A.403 Aircraft defects	Guidance on defect deferment by the pilot and on required equipment
GM1 ML.A.501 Aircraft certificate of release to service	Examples of components/parts that can be installed without an EASA Form 1
AMC1 ML.A.501(e) Classification and installation	Installation of balloon components
GM1 ML.A.502 Component maintenance	Guidance for understanding ML.A.502 table
AMC1 ML.A.801 Aircraft certificate of release to service	Embodiment of standard change or standard repair, based on AMC M.A.801
AMC1 ML.A.801(e) Aircraft certificate of release to service	Issue of CRS, based on AMC M.A.801(f)
AMC1 ML.A.801(f) Aircraft certificate of release to service	Related to MCFs — based on draft AMC M.A.801(g) proposed in Opinion No 01/2017 for Part-M
AMC1 ML.A.803 Pilot-owner authorisation	Authorisation, CRS and link with AMP, based on AMC M.A.803
GM1 ML.A.901 Aircraft airworthiness review	Clarification on the privileges and obligations relevant to the persons or organisations allowed to carry out an airworthiness review
GM1 ML.A.904(c);(d) Qualification of airworthiness review staff	Guidance on independent certifying staff intended to carry out airworthiness review
<b>SECTION B — PROCEDURE FOR COMPETENT AUTHORITIES</b>	
AMC1 ML.B.201 Responsibilities	Template that can be used by the competent authority to collect information about the AMP
AMC1 ML.B.303 Aircraft continuing airworthiness monitoring	Reference for Part-ML to ACAM programmes developed in accordance with Part-M
<b>AMC TO APPENDICES TO PART-ML</b>	
AMC1 to Appendix II to Part-ML — Limited pilot-owner maintenance	List of tasks, based on the AMC to Appendix VIII to Part-M

## 6.2. List and rationale for the AMC and GM to Part-CAO

Reference	Subject/rationale
<b>SECTION A — TECHNICAL REQUIREMENTS</b>	
AMC1 CAO.A.015 Application	Use of EASA Form 2, based on AMC M.A.602
GM1 CAO.A.020 Terms of approval	Guidance for formalising the scope of work in the CAE
GM1 CAO.A.020(a) Terms of approval	Examples of change to scope of work
AMC1 CAO.A.020(c) Terms of approval	Fabrication, based on AMC M.A.603(c)
AMC1 CAO.A.025 Combined airworthiness exposition (CAE)	Template of an acceptable CAE
AMC1 CAO.A.030 Facilities	Hangar/office/storage, based on AMC M.A.605(a), AMC M.A.605(b) and AMC M.A.605(c)
AMC1 CAO.A.045 Airworthiness review staff	ARS authorisation, based on AMC M.A.707(a), AMC M.A.707(c) and AMC1 M.B.102(c)



AMC1 CAO.A.050(a) Components, equipment and tools	Day-to-day maintenance and rarely used tools
AMC1 CAO.A.055 Maintenance data and work orders	Acceptable practice on holding maintenance data
AMC1 CAO.A.060(g) Maintenance standards	Risk of error, based on AMC M.A.402(g)
AMC1 CAO.A.060(h) Maintenance standards	Critical maintenance tasks, based on AMC1 M.A.402(h)
AMC2 CAO.A.060(h) Maintenance standards	Independent Inspection, based on AMC2 M.A.402(h)
GM1 CAO.A.070 Component certificate of release to service	Guidance on clarification on component maintenance release by a Part-CAO
AMC1 CAO.A.070(a) Component certificate of release to service	EASA Form 1 for components removed serviceable or from an aircraft withdrawn from service, based on AMC M.A.613(a)
AMC1 CAO.A.080 Continuing airworthiness management data	Acceptable practice on holding continuing airworthiness management data
GM1 CAO.A.095 Privileges of the organisation	Guidance on CAO privileges
AMC1 CAO.A.095(b)(3) Privileges of the organisation	Subcontracting continuing airworthiness tasks, based on AMC M.A.711(a)(3)
GM1 CAO.A.100(a) Quality system and organisational review	Quality system, based on AMC M.A.712(b)
AMC2 CAO.A.100(a) Quality system and organisational review	Feedback system, based on AMC M.A.712(a)
AMC1 CAO.A.100(b) Quality system and organisational review	Independent audit, based on AMC M.A.712(b)
GM1 CAO.A.100(e) Quality system and organisational review	GM to help in the understanding of small CAO
AMC1 CAO.A.100(f) Quality system and organisational review	Organisational review, based on AMC M.A.616 and AMC M.A.712(f).
<b>SECTION B — PROCEDURE FOR COMPETENT AUTHORITIES</b>	
GM1 CAO.B.017 Means of compliance	Guidance for AltMoc
GM1 CAO.B.045(a) Initial approval	Guidance for the acceptance of management staff, in absence of Form 4.
AMC1 CAO.B.045 Initial approval	Acceptable practice for initial approval without holding the current applicable maintenance data
AMC1 CAO.B.045(c) Initial approval	Introduction of EASA Form 6-CAO (approval recommendation report)
AMC1 CAO.B.055 Continuing oversight	Introduction of EASA Form 6-CAO (approval recommendation report)
<b>APPENDICES TO AMC TO PART-CAO</b>	
Appendix I to AMC1 CAO.B.045(c) and AMC1 CAO.B.055 — EASA Form 6-CAO	EASA Form 6-CAO, based on Appendix VI to AMC M.B.602(f) and Appendix VII to AMC M.B.702(f)
Appendix II to AMC1 CAO.A.100(f) — Organisational review	Based on Appendix VIII to AMC M.A.616

