

AIRCRAFT MAINTENANCE

1 SCOPE

- 1.1 This annex covers the interface between HSE and CAA with respect to aircraft maintenance activities.

2 LEGISLATION

2.1 *HSE remit*

- 2.1.1 HSE enforces the law on health and safety at work during aircraft maintenance activities, wherever they take place within Great Britain (GB).

2.2 *SRG remit*

- 2.2.1 SRG regulates aircraft maintenance organisations in order to ensure that aircraft are fit to make the intended flight.
- 2.2.2 EC Regulation 216/2008 requires that the maintenance of aircraft, products and components used for Commercial Air Transport will be certificated by persons authorised by an EASA Part 145 Approved Maintenance Organisation. Aircraft not used for Commercial Air Transport may be certified by persons authorised by an EASA Part 145, EASA Part M sub-part F Approved Organisation or by independent Part 66 qualified personnel. In the UK, such approvals are granted and monitored by CAA, under the terms set out in EC Regulation 2042/2003. Organisations wishing to maintain aircraft other than those affected by Regulation 216/2008 must be approved by the CAA under National Requirements to furnish reports in accordance with Article 165 of the ANO and British Civil Airworthiness Requirements.
- 2.2.3 Approval will be granted by the CAA if the organisation is able to satisfy the requirement under which they seek approval.
- 2.2.4 When considering an application for approval from a maintenance organisation, the CAA will satisfy itself that the organisation:
- 2.2.4.1 has a management structure in place with certain nominated posts filled by suitably experienced and qualified persons acceptable to the CAA.
 - 2.2.4.2 has sufficient qualified staff authorised to release to service the aircraft and or components it is approved to maintain;
 - 2.2.4.3 has sufficient skilled staff able to carry out maintenance on the aircraft it is approved to maintain;
 - 2.2.4.4 has the facilities to carry out the work for which it is seeking approval;
 - 2.2.4.5 has the necessary tools, test equipment, other equipment, including access equipment, docking, supplementary lighting as required and technical information relevant to the aircraft it is maintaining;
- 2.2.5 Aircraft registered in other States and operating in and out of the UK normally fall outside the direct remit of the CAA. However when advised of a situation involving a foreign registered aircraft that could adversely affect safety CAA in conjunction with DfT will endeavour to ensure that appropriate action is taken.
- 2.2.6 The CAA will also take account of the type of work the organisation seeks approval for, base or line maintenance, and whether the actual numbers of staff employed is consistent with the commitment the organisation has (including the need for people to take adequate rest and vacations).

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- 2.2.7 Account is also taken of the condition and quality of the equipment available to support the approval. Whilst accepting that safety at work is not directly within their remit, the CAA will in particular consider the condition of equipment and docking to be used by those working at height to ensure it is fit for purpose such that the maintenance carried out is to the required standard.
- 2.2.8 Once approval is granted to a maintenance organisation, the CAA will carry out visits at periodic intervals to ensure that the terms and conditions that prevailed at the time the approval was granted are maintained to comply with the requirements. Visits may be pre-arranged or unannounced and outside normal office hours.
- 2.2.9 Once approved, organisations wishing to vary that approval, will be investigated consistent with the variation applied for. This can include establishing that requirements listed in 2.2.4 are in place.
- 2.2.10 Provision exists, under ANO Article 144, for the CAA (or any authorised person, meaning a constable or person nominated by the Secretary of State or the CAA), to prevent any aircraft from taking off if it appears that certain regulations will be contravened or the aircraft is unfit for flight.

3 INTERFACE ARRANGEMENTS

- 3.1 The SRG will lead on issues that may affect the fitness of an aircraft for flight.
- 3.2 The HSE will lead on issues that may affect the health, safety or welfare of people employed by approved aircraft maintenance organisations.
- 3.3 The HSE will also lead when the activities of aircraft maintenance organisations affect the health and safety of people who are not employed by them. However, the HSE will not become involved in issues which concern the fitness of an aircraft for flight.
- 3.4 Examples of the respective responsibilities of the HSE and SRG are shown at Table 1 below.

Subject	SRG responsibility	HSE responsibility
Use of hazardous substances	SRG is interested that the material, both in the manner in which it is applied and the conditions in which it is being applied, does not cause damage to the aircraft or render it unfit for flight.	The employer's duty to ensure health and safety of people affected by the material, including employees of the maintenance organisation and other people.
Use of inspection docking and access equipment	SRG is interested that the inspection docking and access equipment being used allows aircraft maintenance to be carried out to an acceptable standard.	The safety of workers erecting, altering, using or dismantling the inspection docking or access equipment
Lighting	SRG will need to be satisfied that the lighting available allows aircraft	Adequate lighting in the workplace to enable personnel to avoid

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	maintenance to be carried out to an acceptable standard.	hazards, and that the lighting itself is safe and without risks to health.
Entry into aircraft fuel tanks.	That any work carried out in the fuel tank is to an acceptable standard whilst recognising the need to comply with the aircraft manufacturers recommendations associated with such work.	The employer has assessed and is adequately controlling the risks from entry into a confined space.
Inspection using ionising radiations	The inspection is carried out at a time and in conditions consistent with the requirements of the manufacturer and the operators approved maintenance programme.	The risks to health from the use of ionising radiation have been assessed and are being adequately controlled.
Tooling and equipment	Any tooling and equipment that is used to carry out aircraft maintenance activities is consistent with the specification and recommendations of the aircraft manufacturer.	The equipment is safe and without risks to health. Also that it is appropriate and adequate to ensure that the work can be carried out safely, and personnel are competent to use it so as to ensure their health and safety, and that of others.
Electrical safety	That any maintenance carried out on aircraft electrical systems is to an acceptable standard. Any external electrical supply used to power an aircraft whilst undergoing maintenance is consistent with the aircraft manufacturers recommendations.	The safety of workers carrying out the maintenance, including those involved in live working on aircraft electrical systems.

Table 1 Examples of SRG and HSE responsibilities when aircraft are maintained

3.5 Details for contacts for this annex appear in the MoU Contacts Schedule

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4 ACCIDENT INVESTIGATION

4.1 *HSE remit*

4.1.1 HSE may investigate accidents and incidents which occur within its areas of responsibility and will co-operate with other agencies as appropriate.

4.2 *SRG remit*

4.2.1 Aircraft accident investigation falls within the remit of DfT's Air Accident Investigation Branch (AAIB).

4.2.3 If an accident causes damage to an aircraft or to persons on the aircraft (including ground staff) the AAIB should be contacted in the first instance.

4.2.4 The investigation of reportable occurrences involving aircraft under maintenance falls within the remit of SRG (Safety Investigation and Data Department).

4.2.5 If damage is caused to an aircraft as a result of a reportable occurrence SRG Safety Investigation and Data Department should be contacted in the first instance.

4.2.6 NOTE: An 'aircraft accident' is defined in The Civil Aviation (Investigation of Air Accidents and Incidents) Regulations 1996 and limits application of the term to occurrences which take place when persons are on board the aircraft with the intention of flight. Damage to an aircraft during maintenance activity may not constitute an aircraft accident but may be a reportable occurrence under the terms of the Air Navigation Order Article 142 Mandatory Reporting and therefore require to be reported to SRG (Safety Investigation and Data Department).

END

Revision History		
Version	Date	Reason for Issue
Issue 1	17 January 2001	First issue
Issue 1.1	7 March 2005	Minor editorial amendments and revision to HSE contact information
Issue 1.2	1 April 2006	Amended to reflect changes to legislation applicable to the UK CAA in paragraph 2.2.2. In addition, all ANO references updated to reflect ANO 2005.
Issue 1.3	8 July 2008	Minor editorial amendments. Legislation titles, contact information
Issue 1.4	4 August 2009	Revision paragraph 2.2.2 to reflect EASA changes and contact details moved to contacts schedule