



## CAA Implementation Guidance

### Acceptance of nominated personnel to issue, recommend or extend an Airworthiness Review Certificate in accordance with Part M.

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**NOTE:** This guidance will be subject to review following any new or amended EASA regulations.

#### **Rule: M.A.707(a) Airworthiness review staff**

To be approved to carry out airworthiness reviews and, if applicable, to issue permits to fly, an approved continuing airworthiness management organisation shall have appropriate airworthiness review staff to issue airworthiness review certificates or recommendations referred to in Section A of Subpart I and, if applicable, to issue a permit to fly in accordance with point M.A.711(c): These staff shall have:

- 1) At least five years experience in continuing airworthiness (3 years for aircraft of 2730 Kg MTOM and below, not used for the purposes of Commercial Air Transport and Balloons), and;
- 2) An appropriate Part-66 Licence or an aeronautical degree or a national equivalent, and;
- 3) Formal aeronautical maintenance training, and;
- 4) A position within the approved organisation with appropriate responsibilities.
- 5) The requirement to hold an appropriate Part-66 licence or degree from item 2 above may be replaced by five years experience in continuing airworthiness additional to those already required by item 1 above. (This is reduced to an additional 4 years for aircraft of 2730 Kg MTOM and below, not used for the purposes of Commercial Air Transport and Balloons).

#### **Guidance:**

Taking these points in order further consideration has determined that CAA implementation policy is as follows:

- 1) Five years experience in continuing airworthiness.

The experience gained should include a broad range of appropriate continuing airworthiness related activities as required in Part M subpart C and Part M subpart G, M.A.708.

Quality Dept staff may gain experience through carrying out relevant audits & product samples.

For aircraft of 2730 kg MTOM and below, not used for commercial air transport, experience in continuing airworthiness can be gained full or part-time, either in a professional, or a voluntary capacity.

**An appropriate Part 66 Licence, or an aeronautical engineering degree, or equivalent;**

- (i) An appropriate Part 66 Licence in the sub-category means a Category B1-1, B1-2, B1-3 or B1-4 Licence. For B2 and C Licences where there are no sub-categories. The holder should also have endorsed a type rating on an aircraft in the same group. i.e. aeroplane piston engines, aeroplane turbine engines, helicopter piston engines or helicopter turbine engines.

**NOTE:** In the case of a B1 / B2 Licence with limitations, the Licence must be at least dual trade as per BCAR Section L. e.g. a B1 Licence with a limitation on electrical power but includes airframes and engines privileges is acceptable. A B1 Licence that only includes engines but has no privileges on airframe and electrical power is not acceptable.

- (ii) In practical terms the following qualifications can be accepted as being deemed equivalent to a degree.

An aeronautical engineering apprenticeship, that includes associated formal technical college training equivalent to City & Guilds, HNC, ONC, TEC or BTEC (with a merit or distinction in all applicable modules). If another qualification is proposed, the applicant must be able to demonstrate equivalence. An expired BCAR Section L licence in the appropriate sub-category is also considered to be acceptable.

2) Formal aeronautical maintenance training;

- (i) For aircraft used in commercial air transport and aircraft above 2730 kg MTOM, formal aeronautical maintenance training means training, supported by evidence addressing the following subjects:

- a) Relevant parts of initial and continuing airworthiness regulations;
- b) Relevant parts of operational requirements and procedures, if applicable;
- c) The organisation's continuing airworthiness management exposition;
- d) Knowledge of a relevant sample of the type(s) of aircraft gained through a formalised training course. These courses should be to at least Part-66 Level 1 general familiarisation standard.

'Relevant sample' means that these courses should cover typical systems embodied in those aircraft within the organisations scope of approval. In practical terms, as a minimum this should cover at least one aircraft type for each subcategory (i.e. helicopter piston engines, helicopter turbine engines, aeroplane piston engines or aeroplane turbine engines as appropriate) including each type of turbine propulsion system (turbofan, turboprop);

Maintenance methods.

- (ii) For all balloons and any other aircraft of 2730 kg MTOM and below, not used in commercial air transport, appropriate aeronautical maintenance training means demonstrated knowledge of the following subjects:

- a) Relevant parts of initial and continuing airworthiness regulations;
- b) Relevant parts of operational requirements and procedures, if applicable;
- c) The organisation's continuing airworthiness management exposition;

Knowledge of a relevant sample of the type(s) of aircraft gained through training and/or work experience. Such knowledge should be at least at equivalent to Part-66 Level 1 general familiarisation.

'Relevant sample' means that these courses should cover typical systems embodied in those aircraft within the organisations scope of approval. In practical terms, as a minimum this should cover at least one aircraft type for each subcategory (i.e. helicopter piston engines, helicopter turbine engines, aeroplane piston engines or aeroplane turbine engines as appropriate) including each type of turbine propulsion system (turbofan, turboprop);

- d) Maintenance methods.

This knowledge may be demonstrated by documented evidence or by an assessment performed by the CAA or by other Airworthiness Review staff already authorised within the organisation, in accordance with approved procedures. Records of the assessment should be retained on file within the approved organisation.

- 3) A position within the organisation with appropriate responsibilities.

This means the Airworthiness Review staff should hold a position in the organisation independent from the airworthiness management process or with overall responsibility for the airworthiness management of the complete aircraft. The CAA interpretation of this requirement is as follows:

- (i) Accountable Manager or the Nominated post holder for Continuing Airworthiness.
- (ii) A person independent of the continuing airworthiness management process for the aircraft under review.

For example: Technical Services department staff that have airworthiness review responsibilities for a different fleet of aeroplanes or helicopters compared to the type(s) for which they are normally involved, e.g. Technical Services staff on the Boeing fleet may carry out the airworthiness review activity on the Airbus fleet.

- (iii) The person having the overall management responsibility for the department that undertakes the continuing airworthiness management tasks.

This means the person with overall responsibility for all applicable elements of M.A.708(b) for a particular aircraft type or fleet. If the person does not have responsibility for the complete process, they may still be eligible to qualify under (ii) above.

(iv) Quality Dept staff may be eligible provided they do not carry out audits on any ARC process that they have been involved in, or perform an aircraft survey where they have previously carried out a product audit on that aircraft within the last 28 days.

(v) M.A. Subpart G organisations with Part 145 / M.A. Subpart F approval, may nominate maintenance personnel from their Part 145 / M.A. Subpart F organisation as airworthiness review staff as long as they are not involved in the airworthiness management of the aircraft. These personnel should not have been involved in the release to service of that particular aircraft since the last airworthiness review to avoid possible conflicts of interest.

In small organisations that hold both Continuing Airworthiness Management approval and a Maintenance approval, the person with overall responsibility for both approvals may be nominated as the Continuing Airworthiness Manager, the Airworthiness Review signatory and the Certifying staff. The reason being that this person has overall control of the entire process.

(vi) In the case of a one-man organisation, since such a person has overall authority they can be nominated as airworthiness review staff.

(vii) Personnel previously accepted by the CAA to make recommendations for C of A renewal will be accepted provided they can demonstrate formalised training as specified in paragraph (3) above, together with relevant recent experience which has been obtained within the last two years and hold a position within the organisation with appropriate responsibilities.

#### **M.A.706(i) Staff authorised to extend an Airworthiness Review Certificate**

In order to extend an Airworthiness Review Certificate in accordance with M.A.711(a)4, the M.A. Subpart G organisation will need to develop procedures that include the assessment requirements of such personnel. The qualification / experience requirements to extend the ARC are less stringent than those to issue or recommend one, but as a minimum should include the following:

- 1) The nominated person(s) should be working in an environment where they are involved with the continuing airworthiness management process. An ideal person, particularly for the smaller organisation, would be the nominated CAW Manager who has overall responsibility.
- 2) Other person(s) may be nominated where it can be demonstrated that they are actively involved in CAW management and have a sound understanding of Part M Subpart G. This should include in particular, a knowledge of M.A.901(b), i.e. a full understanding of the principles and processes of the 'Controlled Environment'.
- 3) Familiarity with the organization's CAME procedure for extending an ARC and the subsequent notification procedure to CAA. Such a person would therefore be able to demonstrate that they are in a position to fully establish whether an individual aircraft satisfies the 'Controlled Environment' criteria.

The criteria for acceptance of these persons may be broader than is definable here and may vary depending on the size, structure or complexity of the organization.

### **AMC M.A.707 (b) Airworthiness Review staff.**

As part of the approval process, the CAA must formally accept the person nominated to be an Airworthiness Review signatory. This process will involve performing an airworthiness review under supervision to ensure both the procedure and process meet the requirements of M.A.710. The approved organisation is required to nominate airworthiness review staff by submitting an EASA Form 4 to the CAA with details of relevant qualifications and experience. This will be signed and returned by the CAA when all the relevant requirements have been satisfied.

The airworthiness review performed under supervision does not require the CAA Surveyor to be closely supervising or instructing the nominated person when carrying out the review. It can be based on a review of the process with the person by going over a compliance statement that addresses all the elements of M.A.710 and sampling accordingly. Wherever possible the CAA Surveyor will need to be present during the aircraft survey element to ensure it is covering all necessary requirements and sampling as and where appropriate.

Once the first airworthiness review person has been accepted by CAA to issue Airworthiness Review Certificates (ARCs), the organisation may issue further authorisations to appropriately qualified staff subject to a procedure being approved in the exposition which allows cross-assessment. In such cases, evidence of an airworthiness review being carried out under the supervision of another ARC signatory, together with a suitable record of training should be provided to the CAA together with the EASA Form 4.

The organisational procedure contained in the exposition should not allow the approved organisation to qualify personnel that do not meet the requirements of M.A.707(a)1(b) or M.A.707(a)2(b), of not holding an appropriate Part 66 Licence or degree, without the prior agreement or approval of the CAA. If the organisation intends to authorise a person using the equivalent qualification route, approval by the CAA Regional Office Surveyor will be required in each case.

All airworthiness review staff nominated on an EASA Form 4 should also be named in the exposition, as required by M.A.707(d).

### **Renewal of authorisation**

In order to keep the validity of the airworthiness review staff authorisation, the airworthiness review staff should have either:

- a) Been involved in continuing airworthiness management activities for at least six months in every two year period for each authorised sub-category (i.e. helicopter piston engine, helicopter turbine engine, aeroplane piston engine, aeroplane turbine engine, gliders or balloons), or,
- b) Conducted at least one airworthiness review in the last twelve-month period.

In order to restore the validity of the authorisation, the airworthiness review staff should satisfactorily conduct an airworthiness review under the supervision of the CAA or if accepted, under the supervision of another person within the approved CAMO holding valid authorisation to conduct airworthiness reviews. The procedure for renewal of the authorisation should be detailed in the exposition.

In the case of a very small organisation that only has one ARC signatory, the process to restore the validity of the authorisation should be agreed with the CAA. This may include a process similar to that used for the grant of the initial approval.