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Title	Airworthiness review process
NPA Number	NPA 2015-17

UK CAA (European.Affairs@caa.co.uk) has placed **54** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
530	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.712	11	<p>Page No: 11</p> <p>Paragraph No: M.A.712 (f)</p> <p>Comment: The UK CAA considers that this paragraph effectively reduces the scope of current small organisations using regular organisational reviews in lieu of a quality system to issue ARCs to aircraft in the 2,001 kg - 2,750 kg weight range.</p> <p>If the ELA 2 aircraft weight category is going to be increased then the reference in the above paragraph should be amended co-incidentally.</p> <p>Justification: Clarity and removal of potential unnecessary burden.</p> <p>Proposed Text: Revert to original “....except when the organisation issues airworthiness review certificates for aircraft above 2,730 kg MTOM other than balloons.”</p>	
531	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.901	11 - 12	<p>Page No: 12</p> <p>Paragraph No: M.A.901(f)2</p> <p>Comment: Currently M.A.901(i) gives the option for the competent authority to carry out the airworthiness review on all balloons and any other aircraft of 2,730 kg MTOM and below, if it is requested by the owner. The draft proposal is more limiting to owners and does not appear to be risk based. We propose that the occasions when the Competent Authority may carry out the air worthiness review remains as currently published in Regulation (EU) 1321/2014.</p> <p>Justification: To continue to support a risk based approach towards the involvement of the Competent Authority.</p>	
534	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.901(l)	13	<p>Page No: 13</p> <p>Paragraph No: M.A.901(l)2</p> <p>Comment: If the airworthiness review is performed at the same time as the annual inspection and the 90 day anticipation period is used, there is the possibility that the period between annual inspections could be as much as 12 months + 90 days, which is greater than the period considered acceptable under most maintenance programme rules.</p> <p>Justification: Inappropriate extension of the maintenance task intervals may result in an airworthy and unsafe aircraft being made available for use.</p>	

			<p>Proposed Text: “When the airworthiness review is performed at the same time as the annual inspection contained in the maintenance programme and by the same person who releases such annual inspection, it is possible to anticipate the airworthiness review by a maximum of 30 days without loss of continuity of the airworthiness review pattern.”</p>	
535	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.901(l)	13	<p>Page No: 13</p> <p>Paragraph No: M.A.901(l)5</p> <p>Comment: As this proposal removed the three different types of airworthiness review certificate and replaces it with a single certificate, reference to the EASA Form 15c should be deleted.</p> <p>Justification: Accuracy.</p> <p>Proposed Text: “An airworthiness review certificate EASA Form 15a/b 15e is issued, on behalf of the maintenance organisation, by the person who performed the airworthiness review when satisfied that:”</p>	
536	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.901(l)	13	<p>Page No: 13</p> <p>Paragraph No: M.A.901(l)5(b)</p> <p>Comment: Incorrect reference to M.A.901(e). The reference should be by M.A.903(e).</p> <p>Justification: Accuracy.</p> <p>Proposed Text: “(b) the maintenance programme has been reviewed in accordance with point M.A.903(e); and”</p>	
537	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.902	13 - 14	<p>Page No: 13</p> <p>Paragraph No: M.A.902</p> <p>Comment: For Complex Motor Powered Aircraft used for Commercial Air Transport, the UK CAA proposes that that the current requirements of M.A.901(b) are maintained. CAA oversight of organisations involved in the transfer of aircraft between operators shows that there are often shortcomings in the transfer of information needed for the new CAMO to establish full control of the aircraft. A full airworthiness review within 12 months of the point of transfer has proven to be an effective means of mitigating airworthiness risks arising as a result of transferring aircraft between operators.</p> <p>Justification: Provide assurance of an adequate level of airworthiness continuity.</p>	
538	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.902	13 - 14	<p>Page No: 13</p> <p>Paragraph No: M.A.902(b)2</p> <p>Comment: The method of recording that a CAMO has notified the Competent Authority that they are now in full control of the CAW of the aircraft and verifying this when extended ARCs have been received is burdensome. If an organisation is trusted to issue an ARC under the current regulation when they have satisfied themselves an aircraft is in a controlled environment, we should apply the same</p>	

			<p>principles with the ARC extension. No justification is provided to support the placing of an additional burden on the CAMO or on Competent Authorities.</p> <p>Justification: Simplification and removal of unnecessary burden.</p> <p>Proposed Text:</p> <p>"2. the organisation has satisfied themselves that they are in full control of the continuing airworthiness of the aircraft and that the aircraft can be considered as being in a controlled environment."</p>	
539	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.902	13 - 14	<p>Page No: 14</p> <p>Paragraph No: M.A.902(e).</p> <p>Comment: An aircraft without a valid CofA or ARC may fly under the conditions of a Permit to Fly</p> <p>Justification: Accuracy.</p> <p>Proposed Text:</p> <p>"(e) An aircraft must not fly if the airworthiness certificate is invalid, unless it is being flown under a Permit to Fly issued in accordance with Regulation (EU) 748/2012, Part 21, subpart P."</p>	
540	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.903	14 - 15	<p>Page No: 14</p> <p>Paragraph No: M.A. 903(b)3</p> <p>Comment: approved maintenance programme is mentioned when in fact declared maintenance programmes are also acceptable for Non CAT ELA 1 aircraft</p> <p>Justification: Clarity.</p> <p>Proposed Text:</p> <p>"the maintenance due on the aircraft according to the approved or declared maintenance programme has been carried out"</p>	
541	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.903	14 - 15	<p>Page No: 14</p> <p>Paragraph No: M.A.903(b)5</p> <p>Comment: Clarification of who is the Competent Authority in this case is needed. In addition, MA.305 refers to records and therefore using the term 'registered' does not seem appropriate. The UK CAA suggests the following revised text.</p> <p>Justification: Accuracy.</p> <p>Proposed Text:</p> <p>"5. applicable airworthiness directives and any the measures mandated by the competent authority of the State of Registry have been complied with and properly recorded registered;"</p>	
542	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.903	14 - 15	<p>Page No: 14</p> <p>Paragraph No: M.A.903(b)6 /7</p> <p>Comment: MA.305 refers to records and therefore using the term 'registered' does not seem appropriate. The UK CAA suggests the following revised text.</p>	

			<p>Justification: Accuracy.</p> <p>Proposed Text: “6. modifications and repairs applied to the aircraft have been recorded registered and are in compliance with Annex I (Part-21) to Regulation (EU) No 748/2012; 7. service life limited components installed on the aircraft are properly identified, recorded registered and have not exceeded their approved service life limit;”</p>	
548	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.903	14 - 15	<p>Comment: Page No: 15</p> <p>Paragraph No: M.A.903(b)</p> <p>Comment: In order to ensure any operational requirements that are addressed by measures in the airworthiness domain (such as those arising from Part 26), the UK CAA suggests that operational and/or equipment requirements are included in the airworthiness review process. The addition of a new subparagraph to M.A.903(b) is proposed.</p> <p>Justification: Completeness.</p> <p>Proposed Text: M.A.903(b)12 “The aircraft complies with any applicable operational requirements, including operational directives and additional airworthiness specifications for operations, including equipment required by the applicable air operations regulations.”</p>	
549	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.903	14 - 15	<p>Page No: 15</p> <p>Paragraph No: M.A.903(d)</p> <p>Comment: There is a time limitation on the interval between document and physical survey, however it does not put a limitation on sending the recommendation to the Competent Authority (within the 90 day anticipation period).</p> <p>Justification: Clarity.</p> <p>Proposed Text: “(d) The time between physical survey, completion of the documented review and recommendation to the Competent Authority shall not exceed 60 calendar days.”</p>	
551	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.903	14 - 15	<p>Page No: 15</p> <p>Paragraph No: M.A.903(f)</p> <p>Comment: Reference is made to paragraph M.A.901(e) regarding any discrepancies found following the review of the maintenance programme, we believe this reference is incorrect and should be M.A.903(e).</p> <p>Justification: Accuracy.</p> <p>Proposed Text: “Should the review under point M.A.903(e) show discrepancies on the aircraft linked to deficiencies in the content of the maintenance programme,.....”</p>	
552	3.1.1. Changes	15 -	<p>Page No: 15</p>	

	to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.904	16	<p>Paragraph No: M.A.904(a)1(i)</p> <p>Comment: The requirement for qualification of Airworthiness Review Staff no longer includes the ability to use additional experience in place of formal qualifications. If an alternative to a formal qualification is acceptable a provision should be provided within the regulation. The UK CAA suggests that text from AMC M.A.904(a) is transposed into the regulation.</p> <p>Justification: Correctness.</p> <p>Proposed Text: “(a) Staff can be nominated to the competent authority by a continuing airworthiness management organisation to perform airworthiness reviews when they: 1. have acquired knowledge, as shown by: (i) an appropriate license issued in compliance with Annex III (Part 66) to this Regulation, or an aeronautical degree or national equivalent; or, have experience — in addition to the one described in M.A.904(b) — of five years in continuing airworthiness or three years in the case of other-than-complex motor-powered aircraft not used in commercial air transport. (ii) appropriate aeronautical training;”</p>	
554	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.904	15 - 16	<p>Page No: 16</p> <p>Paragraph No: M.A.904(g)</p> <p>Comment: If a person has been formally accepted to perform an airworthiness review of an ELA1 aircraft by the Competent Authority of one Member State, that status should be mutually recognised by all other MS Competent Authorities. The Regulation should also include an information sharing obligation, to enable a competent authority to confirm the status of an individual, when authorised to perform an airworthiness review by the Competent Authority of another Member State.</p> <p>Justification: Clarification.</p>	
555	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.905	16 - 17	<p>Page No: 16</p> <p>Paragraph No: M.A.905(c).</p> <p>Comment: Suggested clarification of the point in time when the new registration can be endorsed on the current ARC</p> <p>Justification: Clarification.</p> <p>Proposed Text: “Where the current airworthiness review certificate remains valid, the certificate with the new registration may be endorsed following issue of the Certificate of Airworthiness:”</p>	
556	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.A.905	16 - 17	<p>Page No: 16/17</p> <p>Paragraph No: M.A.905</p> <p>Comment: There will be occasions where an owner will not be able to register an aircraft in the current Member State due to the</p>	

			<p>differing registration requirements. This paragraph appears to preclude unairworthy aircraft being transferred between Member States (i.e. transferring an aircraft without a valid ARC). This appears to be a restriction on the free circulation of goods and services within the EU.</p> <p>Justification: Clarification.</p>	
558	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — M.B.907	20	<p>Page No: 20</p> <p>Paragraph No: M.B.907(d)</p> <p>Comment: This requires the competent authority to keep 'true' copies of airworthiness review certificates it issues. Is the expectation that in addition to the CAA signature on the document, an appropriately authorised person is required to certify on the document that this is a true copy?</p> <p>Justification: Additional complexity.</p> <p>Proposed Text: "The competent authority shall keep true copies of all airworthiness review certificates it issues."</p>	
559	3.1.1. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 — Appendix III	21	<p>Page No: 21</p> <p>Paragraph No: Part M, Appendix III (ARC template)</p> <p>Comment: The aircraft hours at issue have recently been introduced, which is very useful for competent authorities when establishing the level of activity within their register. The information also serves as one means to potentially reduce fraudulent activity. There is no justification provided for the removal of this valuable data. It is proposed that the field recording for aircraft hours be retained.</p> <p>Justification: Clarification.</p>	
561	3.1.3. Changes to Annex I (Part-21) to Regulation (EU) No 748/2012 — 21.A.174	23	<p>Page No: 23</p> <p>Paragraph No: 21.A.174(b)3(i)</p> <p>Comment: The proposed Part M requirement for the transfer of a used aircraft from a Member State is that it must have a valid ARC. The Part 21 requirement should therefore be that a valid ARC has been issued in accordance with Part M.</p> <p>Justification: Clarification / harmonisation.</p> <p>Proposed Text: "— a valid airworthiness review certificate issued in accordance with Part M; and"</p>	
562	3.1.3. Changes to Annex I (Part-21) to Regulation (EU) No 748/2012 — Appendix II	25	<p>Page No: 25</p> <p>Paragraph No: Part 21, Appendix II</p> <p>Comment: In order to avoid duplication the UK CAA suggests it would be more appropriate to remove the ARC template from Part 21 and refer back to Part M.</p> <p>Justification: Simplicity.</p>	
563	3.2.1. Changes to AMC/GM to	26	<p>Page No: 26</p>	

	Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM M.A.711(c)		<p>Paragraph No: GM to M.A.711(c).</p> <p>Comment: In the current revision to Part M, it allows a CAMO that has the privilege to issue an ARC to non-CAT aircraft below 2,730 kg MTOM to issue a permit to fly. The UK CAA believes that the way the proposed paragraph is written it would appear that it specifies the circumstances when a permit to fly can be issued to CAT aircraft other than ELA2. It does not provide details of the circumstance for the issue of a permit to fly for ELA2 CAT aircraft or non-CAT aircraft.</p> <p>Justification: Clarification.</p> <p>Proposed Text: “for aircraft used in commercial air transport and complex aircraft not used for commercial air transport—and other than ELA2 aircraft, the permit to fly can be issued when the conditions of extension of the airworthiness review certificate described in M.A.902(b) are met.</p> <p><u>New paragraph.</u> — for all non-complex aircraft not used for commercial air transport, the permit to fly can be issued for any aircraft.”</p>	
564	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM M.A.901	26	<p>Page No: 26</p> <p>Paragraph No: GM M.A.901(b)(a)</p> <p>Comment: This paragraph refers to the airworthiness review documented compliance report being appropriately customised by the organisation. Recognition needs to be given to compliance reports for airworthiness reviews on ELA1 aircraft performed by appropriately authorised independent Part 66 personnel (recommending to the Competent Authority).</p> <p>Justification: Accuracy/Completeness.</p> <p>Proposed Text: “(a) The airworthiness review should be documented using a compliance report that should be appropriately customised to by the organisation or Part 66 authorised person to the and type of aircraft and contain at least the items below:</p> <p>(1) general information: — Information on the approved organisation or Part 66 authorised person information; — owner/lessee information; — date and place the documented review and the aircraft survey were carried out; and — period and place the aircraft may be surveyed if required by the competent authority;”</p>	
565	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.901(b)	26 - 28	<p>Page No: 27</p> <p>Paragraph No: AMC M.A.901(b) 2</p> <p>Comment: 2(2) “Aircraft information” – the UK CAA proposes the inclusion of engine & propeller with regards type, manufacturer serial number. Engine and propellers are significant assemblies and can be replaced via STCs etc and may not be those as per TCDS.</p> <p>Justification: Clarity.</p>	

			Proposed Text: "(2) Aircraft, Engine and Propeller information"	
567	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.901(b)	26 - 28	<p>Page No: 28</p> <p>Paragraph No: AMC M.A.901(b)/(d)</p> <p>Comment: Reference is made to the owner of CAMO managing the continuing airworthiness of the aircraft to ensure that the airworthiness review is performed in 'adequate environmental conditions'. The term adequate is too subjective.</p> <p>Justification: Clarification.</p> <p>Proposed Text: "(d) The owner or continuing airworthiness management organisation managing the continuing airworthiness of the aircraft should ensure that the airworthiness review is performed in adequate environmental conditions suitable accommodation. Refer to AMC M.A.901(g)."</p>	
569	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.901(g)	29	<p>Page No: 29</p> <p>Paragraph No: AMC 901(g)(b)</p> <p>Comment: Confusion regarding the use of personnel qualified in accordance with Part 66 has arisen in the past due to the fact that if actions classified as maintenance are to be carried out, a Part 66 licence alone may not be sufficient to allow a CRS for these tasks to be issued.</p> <p>Justification: Accuracy.</p> <p>Proposed Text: "The support of personnel appropriately qualified in accordance with Part 66 and where applicable, appropriately authorised in accordance with Part M subpart F or Part 145 is necessary when the airworthiness review staff of the competent authority is not appropriately qualified."</p>	
570	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM M.A.902(a)	29 - 30	<p>Page No: 30</p> <p>Paragraph No: GM M.A.902(a)(f)1</p> <p>Comment: Clarification is required on the circumstances where an aircraft may fly following ARC expiry.</p> <p>Justification: Accuracy.</p> <p>Proposed Text: "(1) the aircraft cannot fly from the date the airworthiness review certificate expires until it is extended, unless being flown under the conditions of a Permit to Fly issued in accordance with Part 21; and..."</p>	
572	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM M.A.902(b)	30	<p>Page No: 30</p> <p>Paragraph No: GM M.A.902(b)(a)</p> <p>Comment: The UK CAA suggests a revision of the text to provide clarity.</p> <p>Justification: Clarity.</p>	

			<p>Proposed Text: “(a) If the conditions in M.A.902(b) are not fulfilled, the airworthiness review certificate cannot be extended. An airworthiness review will need to be carried out and a new airworthiness review certificate will be issued.”</p>	
573	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.903(a)	30	<p>Page No: 30</p> <p>Paragraph No: AMC M.A.903(a)(e)</p> <p>Comment: The paragraph states: ‘The recommendation should be sent by the owner or continuing airworthiness management organisation managing the continuing airworthiness of the aircraft, not by the airworthiness review staff.’</p> <p>The UK CAA does not understand the rationale for preventing ARC recommendation to be submitted by the airworthiness review staff. When the competent authority is carrying out a review of the ARC recommendation, if a query is identified with the information provided, the competent authority staff should be dealing directly with the airworthiness review staff as they are the ones making a declaration of compliance to the competent authority, not the owner or another person in the CAMO. We suggest that point (e) is deleted.</p> <p>Justification: To oppose the imposition of unjustified constraints.</p>	
575	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.903(b) & (c)	31 - 32	<p>Page No: 31</p> <p>Paragraph No: AMC M.A.903(b) and (c)(a)6</p> <p>Comment: Clarification required on which Competent Authorities measurers in reaction to a safety problem are being referred to i.e. is it the CA of the State of Registry and the State of the Operator, if they are different?</p> <p>Justification: Clarification.</p> <p>Proposed Text: “(6) Airworthiness directives: no applicable airworthiness directives nor measures mandated by the competent authority of the State of Registry and the State of the Operator, if they are not the same, in reaction to a safety problem are overdue.”</p>	
576	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.903(b) & (c)	31 - 32	<p>Page No: 31</p> <p>Paragraph No: AMC M.A.903(b) and (c)(a)9</p> <p>Comment: Not all aircraft have Type Certificates issued by the agency. This should therefore be referred to in the text by reference to TCs accepted by the Agency (E.G. some FAA TCs for light aircraft).</p> <p>Justification: Accuracy</p> <p>Proposed Text: “(9) Type design: — the aircraft complies with the latest revision of its type design approved or accepted by the Agency;”</p>	
577	3.2.1. Changes to AMC/GM to	31 - 32	<p>Page No: 32</p>	

	Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.903(b) & (c)		<p>Paragraph No: AMC M.A. 903 (b) & (c)</p> <p>Comment: Sample check requirement within this section does not address the need to ensure within large fleets of similar aircraft that sampling should be addressed at a fleet level to ensure that across a fleet sufficient variety of samples is taken to ensure a robust airworthiness review process.</p> <p>Justification: Best practice</p> <p>Proposed Text: “(b) (4) Includes how to ensure that within a fleet of similar aircraft that airworthiness review sampling varies between aircraft to ensure the same areas or records are not reviewed on every aircraft within that fleet.”</p>	
578	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.903(b) & (c)	31 - 32	<p>Page No: 32</p> <p>Paragraph No: AMC M.A.903(b) and (c)(d)</p> <p>Comment: Clarification on the role of the airworthiness review staff regarding the physical survey is needed. The paragraph implies that the airworthiness review staff need to be present but not carrying out the survey. If this is the intention when using airworthiness review support staff it needs to be clearer.</p> <p>Justification: Clarification.</p> <p>Proposed Text: “(d) The physical survey is not to be performed remotely, meaning that the airworthiness review staff need to carry out the physical survey be physically present. The airworthiness review staff may delegate the physical survey to the airworthiness review support staff if they are appropriately authorised.”</p>	
579	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.903(b) & (c)	31 - 32	<p>Page No: 32</p> <p>Paragraph No: AMC M.A.903(b) and (c)(f)</p> <p>Comment: The assistance of an appropriate Part 66 licence holder during the physical survey when the airworthiness review staff is not appropriately qualified iaw Part 66, as currently required by M.A.710(b) has been moved to the AMC. The UK CAA believes it is a negative step to move this requirement to the AMC for the reason that if such a qualified person is not readily available there may be a tendency for the airworthiness review staff not to use such qualified personnel and therefore the quality of the physical survey may be reduced as the airworthiness review staff may not have adequate knowledge of the specific aircraft type.</p> <p>The UK CAA does not consider that the role of the Part 66 licensed personnel should be limited to performing and releasing any required maintenance action. We consider that the Part 66 licence holder can help to make up a shortfall in specific knowledge of the aircraft type, which may assist the airworthiness review staff to identify defects, determine acceptance criteria, etc.</p> <p>Justification: Provide assurance of an adequate level of safety.</p>	
580	3.2.1. Changes to AMC/GM to Annex I (Part-M) to	34 - 38	<p>Page No: 34</p> <p>Paragraph No: GM2 M.A.903(b) and (c) – Aircraft Flight Manual</p>	

	Commission Regulation (EU) No 1321/2014 — GM2 M.A.903(b)&(c)		<p>section</p> <p>Comment: Reference is made to allowing non-revised AFM on ELA1 and ELA2 aircraft to be deferred in accordance with M.A.403. Surely this depends on how out of date the AFM is and the nature of the amendments. It may not be possible to determine whether an amendment is safety related or not until it has been reviewed.</p> <p>The UK CAA suggests removing this sentence.</p> <p>Justification: Possible safety implications.</p> <p>Proposed Text: “For ELA1 and ELA2, a non-revised flight manual may be deferred in accordance with M.A.403.”</p>	
582	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM2 M.A.903(b)&(c)	34 - 38	<p>Page No: 36</p> <p>Paragraph No: GM2 M.A.903(b) and (c) – Mass and Balance section</p> <p>Comment: Reference is made to the current mass and balance statement.....</p> <p>Part 21 for the issue of a CofA refers to mass and balance report with a loading schedule. The UK CAA suggests that the text be revised to reflect the Part 21.A.174 requirement for consistency.</p> <p>Justification: Consistency.</p> <p>Proposed Text: “The current mass and balance report with loading schedule statement reflects the current configuration of the aircraft and is valid, and any modifications added or removed have been accounted for.”</p>	
585	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM2 M.A.903(b)&(c)	34 - 38	<p>Page No: 36</p> <p>Paragraph No: Type design section</p> <p>Comment: The wording needs to make clear that engine and propeller type design need to be included as well.</p> <p>Justification: Clarification.</p> <p>Proposed Text: “- compare the aircraft, engine and propeller against the relevant type certificate data sheet requirements.”</p>	
588	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM2 M.A.903(b)&(c)	34 - 38	<p>Page No: 37</p> <p>Paragraph No: GM2 M.A.903(b) and (c) – Type Design section</p> <p>Comment: Reference is made to checking mandatory markings and placards. The UK CAA questions why this is in the Type Design section when it would be more appropriate to include it in the Markings and Placards section? We suggest deleting the requirement from this section.</p> <p>Justification: Remove duplication.</p>	
603	3.2.1. Changes to AMC/GM to	34 - 38	<p>Page No: 37</p>	

	Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM2 M.A.903(b)&(c)		<p>Paragraph No: GM2 M.A.903(b) and (c) – Aircraft Certificates section</p> <p>Comment: Reference is made to documents on board the aircraft which are not part of this revision E.G. crew member licences, load sheets, flight plan, weather reports. This is not relevant to airworthiness and may change on a day to day basis and we suggest deleting this statement from the section.</p> <p>Justification: Relevance.</p>	
606	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM2 M.A.903(b)&(c)	34 - 38	<p>Page No: 38</p> <p>Paragraph No: Complaints of the Last Airworthiness Review section</p> <p>Comment: propose change to section title to provide clarity.</p> <p>Justification: Clarification.</p> <p>Proposed Text: "Findings and Issues raised from the last Airworthiness Review"</p>	
608	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM2 M.A.903(b)&(c)	34 - 38	<p>Page No: 38</p> <p>Paragraph No: GM2 M.A.903(b) and (c) – Markings and Placards section</p> <p>Comment: Add requirement for mandatory placards to be checked.</p> <p>Justification: Simplicity.</p> <p>Proposed Text: New text: "Check mandatory markings and placards (for example, Chapter 11 of the illustrated parts catalogue (IPC) and Aircraft Flight Manual (AFM))."</p>	
609	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM2 M.A.903(b)&(c)	34 - 38	<p>Page No: 38</p> <p>Paragraph No: GM2 M.A.903(b) and (c) – Markings and Placards section</p> <p>Comment: The UK CAA questions why the requirement to check placards and markings in accordance with AFM / TCDS is only applicable to ELA2 aircraft? We suggest it is applicable to all aircraft and suggest deleting reference to ELA2 aircraft.</p> <p>Justification: Accuracy.</p> <p>Proposed Text: "For ELA2 aircraft, Check markings/placards in accordance with the aircraft flight manual/type certificate data sheet."</p>	
611	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.904(a)	39	<p>Page No: 39</p> <p>Paragraph No: AMC M.A.904(a)(c)</p> <p>Comment: Reference is made to the airworthiness review staff having the knowledge and experience required and having been successfully assessed on the aircraft type. What form is this assessment going to take? GM. M.A.904(a) refers to airworthiness review staff requiring a type training course on a sample of aircraft types. There would appear to be a conflict between the AMC and the GM. The AMC appears to require an assessment on all types whereas</p>	

			<p>the GM requires training on only a sample?</p> <p>Justification: Clarification.</p>	
612	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM M.A.904(a)	39 - 41	<p>Page No: 40</p> <p>Paragraph No: GM M.A.904(a)(b)2</p> <p>Comment: Personnel qualified iaw Part 66, B1 are required to have the relevant sub-category in order to qualify for airworthiness review staff, whereas B2 and C qualified staff do not. Recognising that category B2 and C do not have sub-categories, this could lead to a B2 or C qualified person with only experience in Rotorcraft for example, being airworthiness review staff on large jet aeroplanes, whereas a B1.3 person would not qualify.</p> <p>The UK CAA suggests that for Part 66 B2 and C qualified staff need to hold an aircraft type rating in the equivalent B1 sub-category.</p> <p>Justification: Clarity.</p> <p>Proposed Text: “(1) a category B1 licence in the subcategory of the aircraft reviewed; or (2) a category B2 or C licence with a type rating in the appropriate sub-category of the aircraft being reviewed. In this context the sub-categories are: Aeroplanes Turbine, Aeroplanes Piston, Helicopters Turbine and Helicopters Piston; or (3) in the case of piston-engine non-pressurised aeroplanes of 2,000 kg maximum take-off mass (MTOM) and below, a category B3 licence; or”</p>	
613	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM M.A.904(a)	39 - 41	<p>Page No: 40</p> <p>Paragraph No: GM M.A.904(a)(c)2(iii)</p> <p>Comment: For other than complex motor powered aircraft detailed in GM M.A.904(a)(c)1(iv) it refers to knowledge requirements for the sample of aircraft types gained through training and / or experience and makes reference to being equivalent to General Familiarisation training, level 1.</p> <p>However for complex motor powered aircraft no details of the knowledge level is given concerning the requirement for the sample of aircraft types gained through a formalised training course.</p> <p>Justification: Accuracy.</p> <p>Proposed Text: “knowledge of a relevant sample of the type(s) of aircraft which may only be gained through a formalised training course to Level 1 — General Familiarisation of Appendix III to Part 66 and delivered by a Part 147 organisation.”</p>	
615	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM M.A.904(a)	39 - 41	<p>Page No: 41</p> <p>Paragraph No: GM M.A.904(a)(e)3</p> <p>Comment: It is stated within GM M.A.904(e)3 that personnel should not have released that particular aircraft from base maintenance during the preceding three months to avoid possible conflict of interests, the UK CAA does not consider this to be sufficient</p>	

			<p>Justification: Provide assurance of an adequate level of independence.</p> <p>Proposed Text: “...these personnel should not have released that particular aircraft from base maintenance since the last ARC issue (excluding tasks required to be performed during the physical survey of the aircraft or as a result of findings detected during such physical survey) to avoid possible conflict of interests; or”</p>	
616	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.904(b)	41 - 42	<p>Page No: 41</p> <p>Paragraph No: AMC M.A.904(b)(c)</p> <p>Comment: Reference is made to airworthiness review staff being accepted by the competent authority and the inclusion of their name in the exposition that constitutes the formal authorisation. This may be suitable for some airworthiness review staff however, as AMC M.A.904(a)(c)1 requires airworthiness review staff to have been successfully assessed on the aircraft type. For organisations with a large number of different aircraft types it may be impractical to list all the airworthiness review staff and the scope of authorisation in the exposition and it would be more appropriate to issue each airworthiness review staff with an authorisation in the same way that an authorisation is issued in a maintenance organisation.</p> <p>Justification: Simplicity.</p> <p>Proposed Text: “Once the airworthiness review staff has been accepted by the competent authority, the inclusion of their name in the approved organisations’ exposition constitutes the formal authorisation by the organisation. The scope of their authorisation may be detailed in the exposition or in a separate authorisation document.”</p>	
617	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — GM M.A.904(b)	43 - 44	<p>Page No: 43</p> <p>Paragraph No: GM M.A.904(b)</p> <p>Comment: In the table, reference is made to 'HMs' and human performance and limitations. The UK CAA believes this should be 'HF'.</p> <p>Justification: Accuracy.</p> <p>Proposed Text: “Knowledge of HF and human performance and limitations.”</p>	
618	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.904(e)	44 - 45	<p>Page No: 45</p> <p>Paragraph No: AMC M.A.904(e)</p> <p>Comment: AMC M.A.904(e) outlines the requirements for an organisation to establish ARC Signatory recency and how to restore an authorisation when these requirements cannot be met.</p> <p>Is it the intention that Independent Part 66 ARC Certifying Staff that are CA accepted do not have to meet similar recency criteria or be independently monitored as this not clear in the NPA?</p> <p>Justification: Clarity.</p>	
619	3.2.1. Changes	46	<p>Page No: 46</p>	

	to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.905		<p>Paragraph No: AMC M.A.905(i)</p> <p>Comment: This new paragraph allows a new ARC to be issued at the point of transfer between member states but maintaining the previous expiration date. We would welcome clarification as to the purpose of this. The current process of revalidating the existing ARC with the new registration seems to work very well. The one possible advantage is that the operator may not be required to send the original ARC to the competent authority, which may save time when the registration is transferred.</p>	
620	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.905	46	<p>Page No: 46 & 52</p> <p>Paragraph No: GM M.A.905(a) & GM 21.B.326(b)</p> <p>Comment: From an ideological point of view this paragraph seems very appropriate in that it would not be possible to transfer aircraft without a valid CofA between member states, however from a practical point of view it would mean that for every transfer the new member state of registry would need to check with the previous member state authority to confirm the CofA / R CofA had not been suspended or revoked and would result in increased administrative burden and possible delay in the transfer of airworthy aircraft.</p> <p>The UK CAA suggests that it would be better to provide more guidance on the collaboration required between member states for the transfer of both airworthy and unairworthy aircraft.</p> <p>Justification: Simplicity and clarity.</p>	
621	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.906	47 - 49	<p>Page No: 48 & 52</p> <p>Paragraph No: GM M.A.905(b)2 and GM 21.A.174(b)3(i)</p> <p>Comment: This allows for an ARC to be issued before the CofA but does not specify who is responsible for issuing it. If the ARC has expired and the aircraft is transferring between Member States in an unairworthy condition, it should require greater co-ordination between the respective competent authorities and include a survey by the competent authority of the new State of registry to be satisfied of the airworthiness condition of the aircraft.</p> <p>The UK CAA suggests that rather than issuing an ARC as the basis of a transfer document between Member States more guidance should be given on the collaboration between the competent authorities.</p>	
622	3.2.1. Changes to AMC/GM to Annex I (Part-M) to Commission Regulation (EU) No 1321/2014 — AMC M.A.906	47 - 49	<p>Page No: 48</p> <p>Paragraph No: AMC M.A.9046(b)(a)</p> <p>Comment: The requirement for the recommendation to be sent to the competent authority containing a comparison between the prior maintenance programme and the new maintenance programme whilst being a very good idea may not be possible / practical due to the difficulty of the new CAMO to obtain this information from the old one. There may be commercial sensitivities that would prevent the new CAMO being able to get hold of this information. The UK CAA suggests rewording the paragraph as detailed below.</p> <p>Justification: Practicality.</p>	

Proposed Text:

“Comparison between the prior maintenance programme or maintenance records with the proposed maintenance programme, to establish if any maintenance needs to be accomplished as a result of transfer.”