



145 Virtual Approvals

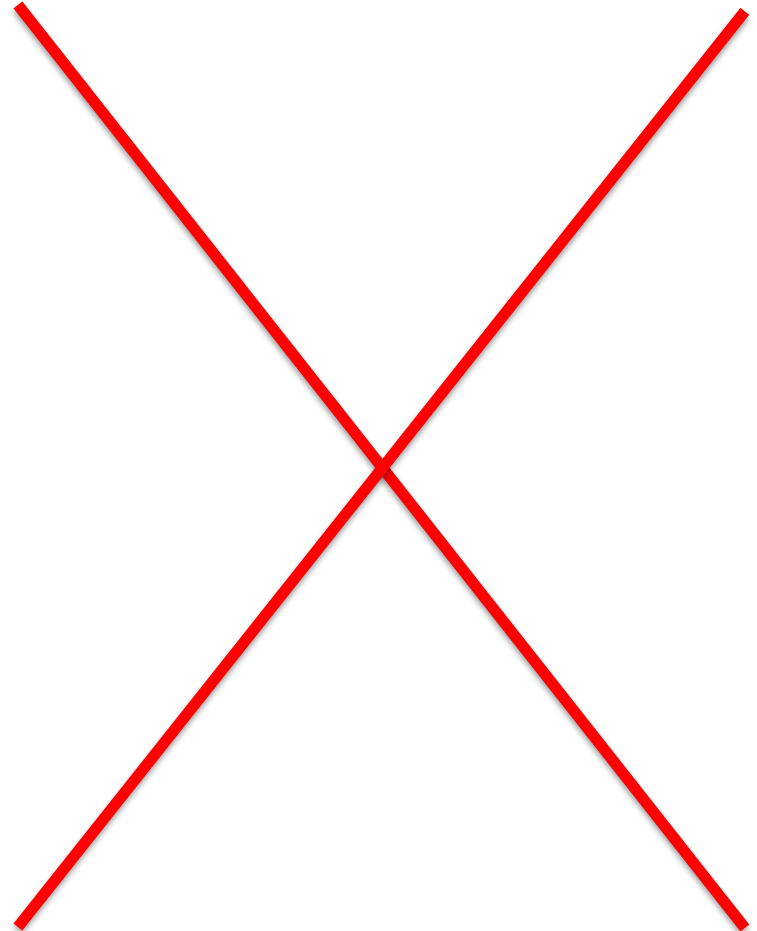
Mark Panton
12/02/2018

What is a Virtual Approval ?

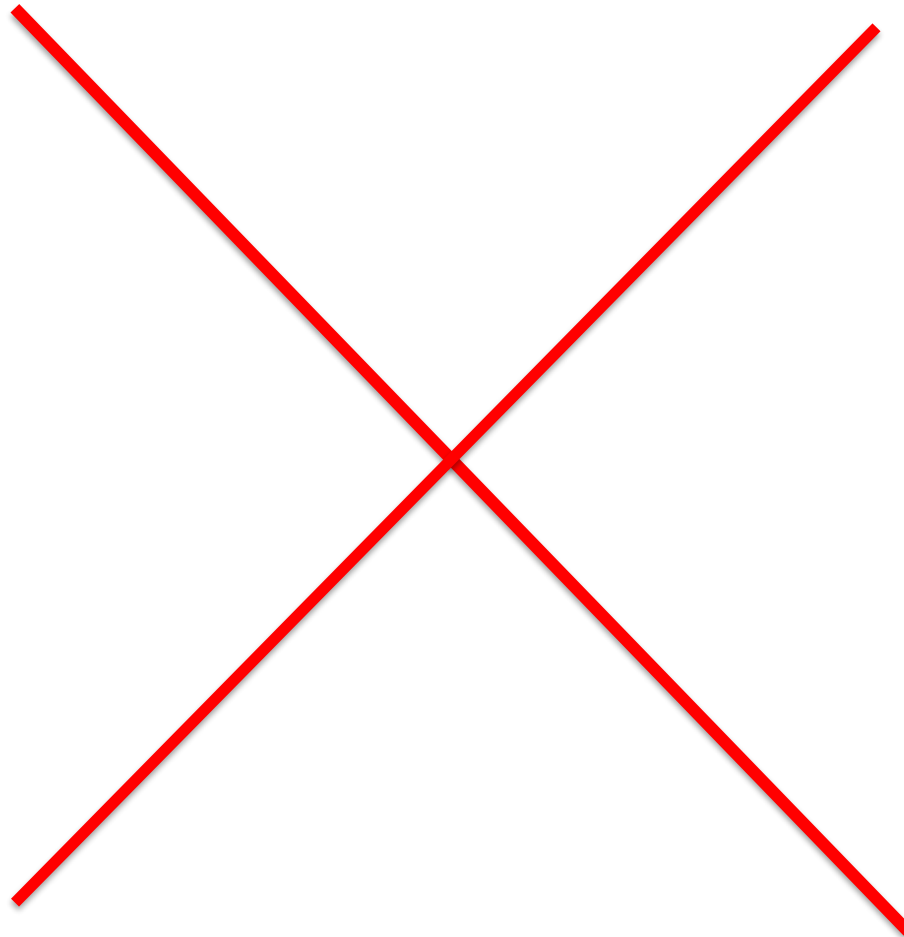
It's an Approval that may lack the essential elements of the requirements;

~~HANGAR~~

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Base Maintenance Needs a Hangar



We can't allow Base Maintenance on a rent a hangar basis as the norm

AMC 145.A.30(d) Personnel requirements



1. Has sufficient staff means that the organisation employs or contracts competent staff, as detailed in the man-hour plan, of which at least half the staff that perform maintenance in each workshop, hangar or flight line on any shift should be employed to ensure organisational stability. For the purpose of meeting a specific operational necessity, a temporary increase of the proportion of contracted staff may be permitted to the organisation by the competent authority, in accordance with an approved procedure which should describe the extent, specific duties, and responsibilities for ensuring adequate organisation stability. For the purpose of this subparagraph, employed means the person is directly employed as an individual by the maintenance organisation approved under Part-145, whereas contracted means the person is employed by another organisation and contracted by that organisation to the maintenance organisation approved under Part-145.

GM 145.A.10 Scope paragraphs 3 and 4 also refers to minimum staffing for small organisations.

IN 2017/015 Published

Information
Notice

Civil Aviation Authority
Information Notice
Number: IN-2017/015



Issued: 20 April 2017

Part-145 – Maintenance Staff Employment Status

This Information Notice contains information that is for guidance and/or awareness.

Recipients are asked to ensure that this Information Notice is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

Applicability:	
Aerodromes:	Not primarily affected
Air Traffic:	Not primarily affected
Airspace:	Not primarily affected
Airworthiness:	EASA Part-145 Organisations
Flight Operations:	Not primarily affected
Licensed/Unlicensed Personnel:	Not primarily affected

1 Introduction

- 1.1 The use of zero hour contracts in the UK has grown substantially over the last few years. It is being seen as a useful employment method by Part-145 organisations to fill shortfalls in manning levels, and thus reduce the need for full time employees. However, the Acceptable Means of Compliance (AMC) material for Part-145 does not consider the status of workers engaged on zero hours contracts. AMC to 145.A.30 (d) explains the need for an organisation to directly employ at least half of its staff to ensure organisational stability. It uses the terms employed and contracted to distinguish between staff directly employed by the organisation and staff who are engaged through other means, possibly on a temporary basis.
- 1.2 This document provides guidance on the status of zero hours contracts, and is intended to enable Part-145 organisations to establish the employment status of staff engaged on a zero hours contract. The staff members' employment status is then used to determine if they are employed or contracted for Part-145.A30 (d) manpower planning purposes.

2 Zero hour contract status

- 2.1 The CAA recognises that Part-145 organisations may wish to take on staff using zero hours contracts. The CAA will ensure that organisations using zero hour contract staff meet the requirements of Part-145 and that their workforce is competent and capable of completing the tasks described in the scope of work.
- 2.2 Part-145 identifies two categories of staff, employed and contracted. Those on zero hours contracts must be correctly assigned to one of the two categories. To ensure consistency, the

Part 145.A.45 Maintenance data



Part 145.A.45 Maintenance data



(a) The organisation shall hold and use applicable current maintenance data in the performance of maintenance, including modifications and repairs. 'Applicable' means relevant to any aircraft, component or process specified in the organisation's approval class rating schedule and in any associated capability list.

In the case of maintenance data provided by an operator or customer, the organisation shall hold such data when the work is in progress, with the exception of the need to comply with point 145.A.55(c).

What EASA FAQ says re Part 145.A.45



<https://www.easa.europa.eu/the-agency/faqs/continuing-airworthiness#category-part-145>

Last Paragraph of FAQ regarding the availability of maintenance data;

Additionally, maintenance data has direct influence on many processes of the AMO ***therefore it should also be available during the initial approval and continuous surveillance audits*** on the AMO to demonstrate the overall capability of the organisation to perform maintenance.

Note;

Before approval is granted you need maintenance data. If you can't get it from the operator you will need generic data from the TC holder.

Tooling Requirements 145.A.40



The organisation shall have available and use the necessary equipment, tools and material to perform the approved scope of work.

1. Where the manufacturer specifies a particular tool or equipment, the organisation shall use that tool or equipment, unless the use of alternative tooling or equipment is agreed by the competent authority via procedures specified in the exposition.

2. *Equipment and tools must be permanently available, except in the case of any tool or equipment that is so infrequently used that its permanent availability is not necessary.* Such cases shall be detailed in an exposition procedure.

3. An organisation approved for base maintenance shall have sufficient aircraft access equipment and inspection platforms/docking such that the aircraft can be properly inspected.

Part 140.A.40 (a) cont

With reference to 145.A.40 (a), the equipment, tools and material **shall** be available to perform the scope of work, and point 2 states that the equipment and tools **must be** permanently available. Using an example of the C check, at the time of initial approval of the scope of work, and then on an on-going basis the organisation **shall** have the necessary equipment and tools to perform the tasks for the scope of work.

Part 140.A.40 (a) cont

There is the alleviation in the text of point 2, that tooling that is used infrequently does not need to be permanently available. To be clear, ***this does not mean the equipment and tooling for the scope of work, if some aircraft types are only seen on an infrequent basis.***

In other words if you usually do C checks on a B737 and only do a B777 check once every year or two you still need all the tooling permanently available to support the scope of your approval.

The CAA's Obligations



As performed by your allocated Surveyor

Recommendations for Issue & Continuation



What the regulation says?

What are the CAA signing for?

What should the CAA have as evidence to continue the scope?

We record our decision on an EASA Form 6

Initial Approval

145.B.25

The competent authority shall formally approve the exposition and issue to the applicant a Form 3 approval certificate, which includes the approval ratings. ***The competent authority shall only issue a certificate when the organisation is in compliance with this Annex (Part-145).***

Continuation



145.B.30

The continuation of an approval shall be monitored in accordance with the applicable ***'initial approval'*** process under point 145.B.25.

Each organisation must be completely reviewed for compliance with this Annex (Part-145) at periods not exceeding 24 months.

UNITED KINGDOM CIVIL AVIATION AUTHORITY

Initial Grant Intermediate Audit Change Continuation

PART-145 APPROVAL RECOMMENDATION REPORT

EASA FORM 6

Part 5: Part-145 Approval or Continued Approval or Change Recommendation*

(* Delete as required)

Name of Organisation: British Airways Maintenance Cardiff Limited

Approval Reference: UK.145.00048

Audit reference(s) UK.145.1278 : UK.145.1281: UK.145.1283 : UK.145.2542

The following Part-145 scope of approval is recommended for this organisation:

See attached document referenced:

Or

CLASS <small>Aircraft/ engine/ component/ specialised- service</small>	RATING <small>Ax/Bx/Cx/Dx</small>	LIMITATION <small>(see Form 3 guidance ref. tbd)</small>	BASE	LINE	STATUS <small>New Revised Cancelled</small>

Or, it is recommended that the Part-145 scope of approval specified in [EASA Form 3](#) referenced 10 May 1993 be continued.

Name of recommending CAA Surveyor: Robert Steel



Signature of recommending CAA Surveyor:

CAA Office: Gatwick

Date of Recommendation: 8 May 2015

Form 6 review (Quality check): Holding

Date: 11 May 2015

We (the CAA and your Surveyor) are signing to confirm that we have reviewed the approval as per the initial application and / or changes and that the organisation is compliant with all aspects of Part 145 for all the scope of work on the certificate.



CAA Information Notice 2017/033

However.....

The CAA recognises that circumstances change and occasionally an organisation may not be able to comply fully with all the requirements. We have therefore published an Information Notice.

We have taken a pragmatic view of Part 145.A.80.



Civil Aviation Authority
Information Notice
 Number: IN-2017/033



Issued: 2 August 2017

Part 145 – Lost Capability

This Information Notice contains information that is for guidance and/or awareness. Recipients are asked to ensure that this Information Notice is copied to all members of their staff who may have an interest in the information (including any 'in-house' or contracted maintenance organisations and relevant outside contractors).

Applicability:	
Aerodromes:	Not primarily affected
Air Traffic:	Not primarily affected
Airspace:	Not primarily affected
Airworthiness:	EASA Part 145 Organisations
Flight Operations:	Not primarily affected
Licensed/Unlicensed Personnel:	Not primarily affected

1 Introduction

- 1.1 Commission Regulation (EU) No. 1321/2014, Part 145 A.85 requires the organisation to notify the Competent Authority of any proposal to make changes to the organisation. This also includes changes to the facilities, equipment, tools, material, procedures, work scope, certifying staff and airworthiness review staff that could affect the approval.
- 1.2 Part 145 A.80 and its AMC provides for the situation where an organisation may temporarily not hold all the necessary tools, equipment etc. for an aircraft type or variant specified in its exposition and/or approval certificate. The regulation provides a means for the Competent Authority to defer revoking the lost capability when it considers the loss to be temporary, and where there is a demonstrable commitment from the organisation to re-establish full capability before maintenance recommences.

2 Actions to be taken where Capability to Perform the Full Scope of Work is Temporarily Lost

- 2.1 The CAA has decided that it will not immediately revoke an aircraft type or rating from an organisation's approval certificate when the capability to maintain a particular product, part or appliance is considered to be temporarily lost. This is based on the organisation agreeing to amend their Maintenance Organisation Exposition (MOE) to reflect the change of capability and to have procedures in place to re-establish compliance with Part 145 before reinstating the particular capability. This policy is not applicable when the CAA considers that an organisation is generally failing to meet its regulatory obligations and that it would be more appropriate to suspend, limit or revoke the approval.

145.A.80 Limitations on the organisation



The organisation shall only maintain an aircraft or component for which it is approved when all the necessary facilities, equipment, tooling, material, maintenance data and certifying staff are available.

AMC 145.A.80 Limitations on the organisation

*This paragraph is intended to cover the situation where **the larger organisation may temporarily not hold all the necessary tools, equipment etc., for an aircraft type or variant specified in the organisation's approval.** This paragraph means that the competent authority need not amend the approval to delete the aircraft type or variants on the basis that it is a **temporary situation and there is a commitment from the organisation** to re-acquire tools, equipment etc. before maintenance on the type may recommence.*

Limitations

We can use the limitation section within the certificate.

We are deciding on options to ensure consistency and standardisation.

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**MAINTENANCE ORGANISATION
APPROVAL SCHEDULE**


REFERENCE:
ORGANISATION:

CLASS	RATING	LIMITATION
COMPONENTS OTHER THAN COMPLETE ENGINES OR APU's	C7 Engine - APU	Components in accordance with the Capability List defined in the Company MOE.

This approval schedule is limited to those products, parts and appliances and to the activities specified in the scope of work section of the approved maintenance organisation exposition.

Maintenance Organisation Exposition reference: ATL/MOE/01

Date of original issue: 15 MAY 2014
Date of last revision approved: 15 MAY 2014
Revision No: 05/14

Signed: 
For the Civil Aviation Authority

EASA Form 3-145 Issue 3
October 2010

How can you help us ?

- Only apply for what you can support and have evidence to prove it.
- Tell us if you lose capability.
- Remove scope from the certificate in a reasonable time frame.
- Don't treat your certificate as.....

A Shop Window

We can't cut a deal.....



We get audited too...

In Summary

The CAA can not issue an approval on a promise.

The organisation must demonstrate they have *Tooling, Data, Staffing, and a suitable Facility* at the grant of the approval, and on our continuation recommendation.



Thank You

