



Rotorcraft Industry Seminar

Airworthiness Policy Update

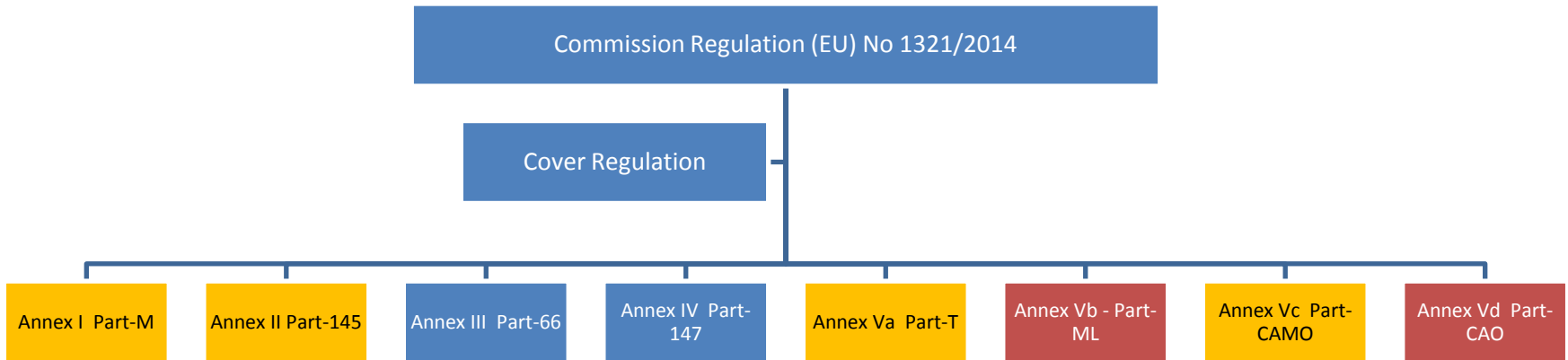
7 September 2017

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Topics for today

- Rulemaking update
- Part 145

Rulemaking



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Rulemaking

- Part M Light
- Part CAMO (SMS)

- Agreement by the Member States on the proposed text
- Review by the Legal Services of the Commission before vote by the Member States.
- Still ongoing due to issues raised by the Commission Legal Services
- No visibility of when the text could be finally voted by the Member States.

- **Not expected to be in force until late 2018 – early 2019**

Part 145 - Approval Structure Essential Elements

- Facilities
- Personnel
- Staff
- Maintenance Data
- Tooling and Materials
- Production Planning
- Certification
- Quality System
- Exposition and Procedures

Terms of Approval

- The rating and basic scope of work is defined on the Approval Certificate
- Scope of work in more detail set out in the Maintenance Organisation Exposition (MOE) and associated capability list (components)

Lost Capability – IN-2017/033

- Lost capability – greying out
- A means by which the CAA can defer revoking lost capability if considered temporary.
 - Commitment from organisation to re-establish full capability
- Temporary loss of capability to maintain a product, part or appliance
 - Organisation amends MOE to reflect capability change
 - Procedures in place to re-establish compliance
 - Demonstrated commitment must be presented
- When a continuation recommendation is required, either;
 - Demonstrate full compliance, or
 - Affected capability will be revoked

Occasional & Temporary Line Stations – IN-2017/011



- Occasional – infrequent or irregular, of limited duration
 - Limited to 10 consecutive days
 - Does not include scheduled maintenance
 - Process and procedures required

- Temporary
 - Organisation audits prior to start
 - CAA notified in writing
 - Process and procedures required
 - In operation for a maximum of 6 months
 - More than 6 months – permanent line station required
 - Repetitive use at same location not permitted

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Facility Requirements

- Appropriate facilities to protect against environment and contamination
 - Available and large enough
- Environment must be appropriate for the task and must not impair effectiveness of personnel
- Line Maintenance may require hangar/workshop facility - dependant upon scope and environment
- Secure and appropriate storage conditions
- Office accommodation

Facilities



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Personnel Requirements

- A nominated management team responsible to the Accountable manager
- Accountable Manager to appoint a Person responsible for the Quality system
- Must have a man-hour plan showing sufficient staff (contract staff restrictions)
- The competence of personnel to be established

Personnel Requirements

Zero Hours Contracts – IN-2017/015

- Zero Hours contracts are acceptable.

- All individuals are contractors
 - Or
- Individuals can be classified as an employee when the organisation can demonstrate that the individual:
 - Meets the requirements for an employee as described on the [government website](#);
 - Reports for work when requested;
 - Does not do any work for another maintenance organisation.

Maintenance Data

- Organisation shall hold current maintenance data
- Organisation can have procedures to modify instructions.
- Procedures to ensure data is current & controlled
- Operator may supply the applicable maintenance data to the Organisation

Maintenance Data

- The maintenance data either can be arranged directly by the Part-145 maintenance organisation or provided by the customer/operator.
- There are certain situations when the maintenance data can only be obtained through the customer/operator.
- Maintenance data has direct influence on many processes therefore it should be available during the initial approval and continuous surveillance audits to demonstrate the overall capability of the organisation to perform maintenance.

Equipment, Tools and Material

- All recommended tooling must be available
- Recommended by the Aircraft Manufacturer or OEM
- Control of tools requiring calibration must be traceable to national standards

Tooling and Equipment

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

Sub-contracting

- Allows an unapproved organisation to carry out work under the Quality system of an Approved Maintenance Organisation
- Provides for specialised processes to be sub-contracted

Painting



CAMO



Contract



Part 145

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Painting



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Summary

- Part 145 is a maintenance organisation approval
- There must be a management structure suitable for the size and scope of the organisation
- Certification of all maintenance must be carried out by appropriately authorised personnel
- The organisation must have an independent quality system
- The organisation must have procedures to ensure safe maintenance practices and compliance with Part 145

To hold the approval

Compliance is

Demonstrated not Promised

Questions & Thank you