

You can save this page as HTML and then open it in Microsoft Word for further editing.

Title	Light Part-M
NPA Number	NPA 2015-08

UK CAA (European.Affairs@caa.co.uk) has placed **21** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
261	2. Explanatory Note — 2.2. Objectives	6	<p>Page No: 6 and 7</p> <p>Paragraph No: 2.2. Objectives; and 2.3.1. Description of the 'Developing a Light Part-M' option</p> <p>Comment: The objectives of the working group and of the proposed changes are set out in Section 2, Explanatory Note. The objectives used the words, 'simpler', 'clearer' and 'more proportional rules', and 'as clear and simple as possible' in order to facilitate implementation. There is also an, objective to separate 'Light Part-M' (Part-ML), and make it independent from Part-M.</p> <p>Utilising the text from Part M, and in an attempt to minimise the size of the proposed Part ML, has created the situation where the wording used in some areas does not make the proposal easy to follow and therefore has the potential to lead to confusion or lack of understanding on the part of the reader.</p> <p>If the text cannot be understood quickly and easily by members of the general aviation community then the intention of the proposal will be compromised, and with it the presumption that the new regulation will increase in the level of safety.</p> <p>Examples include: ML.A.201 (c) and (d), where the terms "not operated under Part-NCO rules" and "operated under Part-NCO rules" are used. For the average GA pilot/owner these two statements in the context will prove difficult to interpret and understand. This will need to be expanded into a much larger statement to enable the reader to understand the detail.</p> <p>Justification: The proposal should be as simple and clear a possible in order to meet its stated objectives</p>	
262	2. Explanatory Note — 2.3. Regulatory Impact Assessment (RIA) — 2.3.1. Description of the 'Developing a Light Part-M' option	7	<p>Page No: 7</p> <p>Paragraph No: 2.3.1 Description of the 'Developing a Light Part-M' option, sub-paragraph 1</p> <p>Comment: In paragraph 2.3.1 sub-paragraph 1, it is stated that the objectives of the task could be met by creating a separate 'Light Part-M' (Part-ML), independent from Part-M, which is as clear and simple as possible;</p> <p>Throughout the new, proposed Annex VI, there are numerous links, inferred connections back to the existing Part M regulation and parts of the text are repeated from Part M. The objective to significantly lower the complexity of the regulation and achieve a separate, independent Part M Light has not been fully achieved with the</p>	

			<p>proposal in its current form.</p> <p>Examples are:</p> <ul style="list-style-type: none"> • the new Form 15c mixes Part M and Part ML; • for the same class of aircraft ML.A.302 (d) (1) is in contradiction with M.A.302 (i) for calculating the next inspection time after the tolerance is applied; • ML.A. 902, 903 and 905 have been repeated from Part M. <p>It is suggested that Part M and the proposed Part ML are completely separated to enable a reduction in the text within Part M through the removal of the derogations and alleviations that has complicated the text for the reader. It will also enable changes made to one regulation not to affect the other.</p> <p>Justification: To implement the changes demanded by the General Aviation community that are captured in the NPA in paragraph 2.1 of the Explanatory Note.</p> <p>Proposed Text: Produce a completely separate Part M and Part M-Light regulations.</p>	
263	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.2. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014	18 - 20	<p>Page No: 19-20</p> <p>Paragraph No: Appendix III – Airworthiness Review Certificate – EASA Form 15; EASA Form 15c Issue 2</p> <p>Comment: The proposed Form 15c has grown in size with the addition of extra text that is not necessary. Reference to whether the review was conducted in accordance with Part M or Part ML is not needed, as the review is always performed in accordance with M.A.710. As is the validity extension process, when permitted.</p> <p>The contents of the Airworthiness Review Certificate should be as simple as possible, as it is simply a statement that an aircraft was deemed airworthy at a particular moment in time. Simplifying its contents will provide a much clearer and more easily understood certificate. The current Form 15b is sufficient for use where the airworthiness review has been completed by an organisation other than the Competent Authority. The Form 15b could be amended to include the Name and Part 66 licence number of the certifying staff issuing an ARC. This would then remove the need for a Form 15c.</p> <p>Justification: Simplification</p> <p>Proposed Text: Delete Form 15c and amend the Form 15b</p>	
264	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-	22 - 23	<p>Page No: 22</p> <p>Paragraph No: ML.1 General</p> <p>Comment: ML.1 specifies a DAH as a 'Design Approval Holder'. However it does not provide a further definition.</p>	

	ML) to Regulation (EU) No 1321/2014 — ML.1 General		<p>Justification: For clarity.</p> <p>Proposed Text: Expand definition to read:</p> <p>“Design Approval Holder means the Type Certificate Holder, Supplementary Type Certificate Holder and any other organisation that may publish design data in accordance with Part 21.”</p>	
265	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.101 Scope	23	<p>Page No: 23</p> <p>Paragraph No: ML.A.101 and M.A.101</p> <p>Comment: It is recommended that paragraph ML.A.101 is amended as proposed below. In addition it is suggested that the same amendment is made to Part M paragraph M.A.101.</p> <p>Justification: Clarity and readability.</p> <p>Proposed text: Replace paragraph ML.A.101 with the following:</p> <p>“This Section establishes the measures to be taken to ensure that aircraft remain airworthy and are appropriately maintained. It also specifies the conditions to be met by the persons or organisations involved in such continuing airworthiness management”</p>	
266	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.302 Aircraft maintenance programme	25 - 27	<p>Page No: 25</p> <p>Paragraph No: ML.A.302(c)4 Aircraft maintenance programme</p> <p>Comment: Reference is made to mandatory airworthiness limitations published in ICA or TCDS. In a few cases such as the early Beechcraft 200 series, which although not applicable to ELA1 aircraft, the airworthiness limitations are published in the AFM. Therefore UK CAA recommends that the paragraph is amended as proposed below.</p> <p>Justification: To ensure that such important information is not missed.</p> <p>Proposed Text: Amend to read:</p> <p>“shall include all the mandatory continuing airworthiness information, such as repetitive ADs, Airworthiness Limitation Section (ALS) of the Instructions for Continued Airworthiness (ICA), retirement lives contained in Aircraft Flight Manual (or Pilot Operating Handbook), or specific maintenance requirements contained in the Type Certificate Data Sheet (TCDS)”</p>	
267	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.302 Aircraft maintenance programme	25 - 27	<p>Page No: 26</p> <p>Paragraph No: ML.A.302 (c)(7) last sub-paragraph, Aircraft maintenance programme</p> <p>Comment: It is not clear in ML.A. 302 (c)(7) who's responsible for making changes to the maintenance programme, in the event that there are discrepancies resulting from deficiencies to the maintenance programme. It is proposed that ML.A.302 (7) should say: ‘the person responsible for the AMP shall amend the AMP accordingly...’. This would make it clear that the owner has the obligation, or in the event that the owner had entered in to a limited contract to amend the maintenance programme, the CAMO, to revise the contents of the maintenance programme.</p>	

			<p>Justification: If it is not clear who is responsible for amending the contents of a maintenance programme the required changes may not be made when there are discrepancies.</p> <p>Proposed Text: Amend last paragraph in ML.A.302 (c)(7) to state:</p> <p>"... If the review shows discrepancies on the aircraft linked to deficiencies in the content of the AMP, <i>the person responsible for the AMP shall amend it accordingly.</i>"</p>	
268	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.302 Aircraft maintenance programme	25 - 27	<p>Page No: 26/27</p> <p>Paragraph No: ML.A302 (d) A 'Minimum Inspection Programme': sub-paragraph (1) ,</p> <p>Comment: In the first bullet under sub-paragraph (1) it is stated that a tolerance of 1 month or 10 h may be applied to inspection intervals for aeroplanes, Touring Motor Gliders and Balloons.</p> <p>The second bullet under sub-paragraph (1) states that a tolerance of 1 month may be applied to that interval for sailplanes and powered sailplanes.</p> <p>There is no mention of an airworthiness review anticipation period within NPA 2015-08. It is obliquely referenced in ML.A.901(b)(3) by way of a reference to M.A.901(I) of Part M.</p> <p>Given the complication of the proposed text the user of Part M Light might not realise that using the tolerances stated in ML.A.302 might result in an expired ARC. UK CAA propose that the tolerance of 1 month from the annual inspection should be removed and an anticipation period of 30 days to allow for better planning of the annual inspection and ARC should be added. A note is also proposed to ensure that allowable tolerances for scheduled maintenance tasks are not inadvertently applied to mandatory requirements.</p> <p>Justification: To make it simpler to allow the owner to keep the annual inspection and the ARC aligned and reduce the risk of overrun of mandatory requirements such as repetitive ADs.</p> <p>Proposed Text:</p> <p>Replace the text under both bullet points under (d)(1) as follows:</p> <p>"(d) A 'Minimum Inspection Programme': (1) shall contain the following inspection intervals: — for aeroplanes, Touring Motor Gliders (TMG) and balloons,. A tolerance of 10 h may be applied to-the 100 h interval inspection for non mandatory tasks. The next interval shall be calculated from the time the inspection takes place. (It must be noted that the 10 h tolerance may not be used for any mandatory requirements falling due within 100 h interval);</p> <p>Add new second bullet point under (d)(1) as follows:</p> <p>- "The annual inspection can be anticipated by a maximum of 30 days without loss of continuity of the programme, to allow for the annual inspection to take place coincident to the airworthiness review. (It must be noted that using the one month anticipation period may result in mandatory requirements within annual inspection becoming due prior to the next annual inspection)"</p>	

269	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.307 Transfer of aircraft continuingairwort records	29 - 30	<p>Page No: 29</p> <p>Paragraph No: ML.A.307 Transfer of aircraft continuing airworthiness records</p> <p>Comment: Reference is made to ML.A.306, however there is no such paragraph in this NPA. Either the reference to ML.A.306 needs to be removed or a paragraph needs to be added.</p> <p>Justification: Correctness and completeness.</p>
270	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.401 Maintenance data	30	<p>Page No: 30</p> <p>Paragraph No: ML.A.401(b)3</p> <p>Comment: Revise paragraph to make reference to 'Design Approval Holder' and delete reference to 'TC holder, STC holder' etc. (UK CAA comment on paragraph ML.1 General refers).</p> <p>Justification: Consistency of language.</p> <p>Proposed Text: Amend to read:</p> <p>'(3) applicable instructions for continuing airworthiness issued by the design approval holder.'</p>
271	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.402 Performance of maintenance	30	<p>Page No: 30</p> <p>Paragraph No: ML.A.402(a) Performance of maintenance</p> <p>Comment: Reference is made to Independent Inspections, however unlike Part M, M.A.402, there is no supporting AMC to this paragraph.</p> <p>Justification: Completeness</p> <p>Proposed Text: AMC ML.A.402 to be added, as follows:</p> <p>"Independent inspections</p> <p>· The manufacturer's instructions for continued airworthiness should be followed when determining the need for an independent inspection.</p> <ul style="list-style-type: none"> • In the absence of maintenance and inspection standards published by the organisation responsible for the type design, maintenance tasks that involve the assembly or any disturbance of a control system that, if errors occurred, could result in a failure, malfunction, or defect endangering the safe operation of the aircraft should be considered as flight safety sensitive maintenance tasks needing an independent inspection. A control system is an aircraft system by which the flight path, attitude, or propulsive force of the aircraft is changed, including the flight, engine and propeller controls, the related system controls and the associated operating mechanisms.

- Independent inspections should be carried out by at least two persons, to ensure correct assembly, locking and sense of operation. A technical record of the inspections should contain the signatures of both persons before the relevant CRS is issued.

- An independent inspection is an inspection first made by an authorised person signing the maintenance release who assumes full responsibility for the satisfactory completion of the work, before being subsequently inspected by a second independent competent person who attests to the satisfactory completion of the work recorded and that no deficiencies have been found.

- The second independent competent person is not issuing a maintenance release therefore is not required to hold certification privileges. However they should be suitably qualified to carry out the inspection.

- When work is being done under the control of an approved maintenance organisation the organisation should have procedures to demonstrate that the signatories have been trained and have gained experience on the specific control systems being inspected.

- When work is being undertaken by an independent M.A.801 (b) 2 certifying staff, the qualifications and experience of the second independent competent person should be directly assessed by the person certifying for the maintenance, taking into account the individual's training and experience. It should not be acceptable for the certifying staff signing the release to show the person performing the independent inspection how to perform the inspection at the time the work is completed.

- In summary the following maintenance tasks should primarily be considered when inspecting aircraft control systems that have been disturbed:

installation, rigging and adjustment of flight controls.

installation of aircraft engines, propellers and rotors.

overhaul, calibration or rigging of components such as engines, propellers, transmissions and gearboxes.

Consideration should also be given to:

previous experience of maintenance errors, depending on the consequences of the failure.

information arising from an 'occurrence reporting system'

- When checking control systems that have undergone maintenance the person signing the maintenance release and the person performing the independent check should consider the following points independently:

all those parts of the system that have actually been disconnected or disturbed should be inspected for correct

			<p>assembly and locking.</p> <p>the system as a whole should be inspected for full and free movement over the complete range.</p> <p>cables should be tensioned correctly with adequate clearance at secondary stops.</p> <p>the operation of the control system as a whole should be observed to ensure that the controls are operating in the correct sense.</p> <p>if the control system is duplicated to provide redundancy, each system should be checked separately.</p> <p>if different control systems are interconnected so that they affect each other, all the interactions should be checked through the full range of the applicable controls.”</p>	
272	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.403 Aircraft defects	31	<p>Page No: 31</p> <p>Paragraph No: ML.A.403 (b)(2) Aircraft defects</p> <p>Comment: The wording of this paragraph infers that the pilot can defer a defect on required equipment when using the MEL approved by the competent authority, ‘otherwise, these defects may only be deferred by the authorised engineer’. It is not clear what the circumstances are when an authorised engineer may defer a defect affecting required equipment</p> <p>Justification: Potential Flight Safety Hazard, Human factors</p> <p>Proposed Text: Replace sub-paragraph (b)(2) with the following:</p> <p>“(2) Defects affecting required aircraft equipment may be deferred by the pilot or authorised engineer using the minimum equipment list either approved by the competent authority, EASA, or by using the MMEL approved by the State of Design. Otherwise these defects may not be deferred.”</p>	
273	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.403 Aircraft defects	31	<p>Page No: 31</p> <p>Paragraph No: ML.A.403 (d)</p> <p>Comment: This point implies that any defect not rectified before flight shall be recorded in the ML.A.305 aircraft maintenance record system and shall be visible to the pilot. The aircraft maintenance records for aircraft affected by Part ML are not required to carry any documents (e.g. a technical log) that provide a means of communication between pilots or between pilots and maintenance personnel (maintenance/airworthiness). It is highly unlikely that the ML.A.305 records will be available on a flight line.</p> <p>Aircraft regardless of weight and type of operation should carry a minimum technical document that allows for provision to record defects. AMC to ML.A.403 (d) should be developed to describe typical documentation or electronic media that can be used to record deferred defects and notify pilots/maintenance personnel.</p> <p>Justification: Potential Flight Safety Hazard</p> <p>Proposed Text: Amend ML.A.403 (d) as follows:</p>	

			<p>“Any defect not rectified before flight shall be recorded in the ML.A.305 aircraft maintenance record system and shall be visible to the pilot, owner and authorised certifying staff.”</p> <p>In addition, AMC to ML.A.403 (d) should be developed to provide examples of how this is made available to all relevant personnel.</p>	
274	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.503 Service life-limited components	33	<p>Page No: 33</p> <p>Paragraph No: ML.A.503 Service life-limited components</p> <p>Comment: There is no definition of ‘Service Life Limit’ or ‘Certified Life Limit’. It is suggested that AMC is added to clarify.</p> <p>Justification: Clarity.</p> <p>Proposed Text:</p> <p>(i) Certified Life Limit refers to components subject to a life, expressed in flying hours, flight cycles or calendar time, after which the components shall be retired.</p> <p>(ii) Service Life Limit refers to components subject to a life, expressed in flying hours, flight cycles or calendar time, after which the components shall undergo maintenance to restore their serviceability.</p>	
275	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.801 Aircraft certificate of release to service	34 - 35	<p>Page No: 34</p> <p>Paragraph No: ML.A.801 Aircraft certificate of release to service</p> <p>Comment: There is no AMC to support what is meant by ‘proper qualifications’. It is recommended that AMC is added as proposed below.</p> <p>Justification: Clarification.</p> <p>Proposed Text: Add new AMC:</p> <p>“Holding the proper qualifications” means holding either:</p> <p>a) a valid ICAO Annex 1 compliant maintenance license for the aircraft type requiring certification, or;</p> <p>b) a certifying staff authorisation valid for the work requiring certification, issued by an ICAO Annex 6 approved maintenance organisation.</p>	
277	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.901 Aircraft airworthiness review	35 - 36	<p>Page No: 36</p> <p>Paragraph No: ML.A.901 (b)(3) Aircraft airworthiness review</p> <p>Comment: There is no mention of the ARC review 90 day anticipation period within NPA 2015-08, it is obliquely referenced in ML.A.901(b)(3) by way of a reference to M.A.901(I) of Part M.</p> <p>It is also proposed that the Annual Inspection has a 30 day anticipation period to match that of the ARC. A 90 day anticipation period for the annual inspection is considered inappropriate.</p> <p>Justification: To create a separate ‘Light Part-M’ (Part ML),</p>	

			<p>independent from Part-M, which is clear and simple as possible.</p> <p>Proposed Text: Add new sub-paragraph ML.A.901 (e) as follows:</p> <p>“By derogation to point ML.A.901 (a) and ML.A.901(b)(3), the airworthiness review can be anticipated by a maximum period of 30 days without loss of continuity of the airworthiness review pattern and to retain alignment with the annual inspection.”</p>	
278	<p>3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.901 Aircraft airworthiness review</p>	35 - 36	<p>Page No: 36</p> <p>Paragraph No: ML.A.901 (b)(4) i and ii Aircraft airworthiness review</p> <p>Comment: The proposed change to allow Part 66 certifying staff to carry out annual inspection, airworthiness review and review of the AMP, in accordance with M.A.710 of Part M, does not require copies of the airworthiness review certificate issued together with any supporting documents to be kept, this was previously addressed in Part M, M.A.714 (b) and (d), for organisations holding privileges in point M.A.711 (b). The record system to be established by the owner ML.A.305 (h) does not make provision for these records.</p> <p>Justification: If there is no requirement for Part 66 certifying staff to pass the records of an airworthiness review previously applied under Part M, M.A.714 (b) and (d) to the aircraft owner, the Part 66 certifying staff may not in practice keep or pass on the certificate or supporting documents., The document trail supporting the airworthiness of the aircraft could therefore be lost and the airworthiness of the aircraft is cast into doubt.</p> <p>Proposed Text: It is recommended that an additional sub paragraph should be added at ML.A.305 (h) – item 7:</p> <p>“(7) In the case where an independent Part 66 rated licence holder performs the airworthiness review and issues the ARC specified in point ML.A.901 (b)(4), the Airworthiness Review Certificate and documented review described in M.A.710(a) shall be retained by the owner until it has been superseded by another airworthiness review.”</p>	
282	<p>3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.901 Aircraft airworthiness review</p>	35 - 36	<p>Page No: 36</p> <p>Paragraph No: ML.A.901 (b)(4), Aircraft airworthiness review</p> <p>Comment: The proposed change to allow Part 66 certifying staff to carry out the annual inspection, airworthiness review and review of the AMP is seen as a potentially positive move in line with providing a simple, proportional rule. Without the involvement of approved organisations, and with only limited reference to the Competent Authority, the Part 66 licence holder is now the only point within the regulatory system at which the airworthiness of an aircraft is established. . It is therefore vitally important that the individual is suitably experienced and fully competent to carry out this task. A Part 66 licence, on its own, does not ensure that the individual has the necessary understanding and knowledge to complete an airworthiness review or to review the adequacy of the content of an AMP. A demonstration of competence should be required before allowing individuals to independently perform an airworthiness review.</p> <p>The ideal solution would be to include a relevant knowledge and experience requirements in the Part 66 license requirements.</p>	

Justification: To maintain an adequate level of safety assurance within the European regulatory system.

Proposed Text:

Replace the current text for (b)(4) with the following:

“(4) for sailplanes, balloons, hot-air airships and ELA1 aeroplanes, operated under Part-NCO rules, the certifying staff performing the annual inspection contained in the AMP, when appropriately authorised:

An Airworthiness review authorisation will be provided when:

(a) An application for an airworthiness review authorisation is made on a form and in a manner prescribed by the Competent Authority.

(b) To be eligible for an airworthiness review authorisation, an applicant must -

(1) Hold a Part 66 licence which is currently effective and has been in effect for a total of at least 3 years;

and

(2) Have been actively engaged, for at least the 2-year period before the date of application, in maintaining aircraft in accordance with their licence;

and

(3) Perform an airworthiness review under the supervision of the competent authority. Demonstrating their ability to carry out an airworthiness review and review of a maintenance programme in accordance with Part-ML, including the applicable cross-referred parts of Part-M. Individuals previously approved by a CAMO or as an approved certifying staff in accordance with M.A.901(g) will be accepted as meeting this requirement.

Authorisation: Privileges.

The holder of an airworthiness review authorisation may:

(1) Perform an annual inspection in accordance with the aircraft maintenance programme, and,

(2) Carry out a review of the maintenance programme, and

(3) Carry out an airworthiness review on the aircraft, and if the review is satisfactory and the aircraft is airworthy issue the ARC”

283	3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.901 Aircraft airworthiness review	35 - 36	<p>Page No: 36</p> <p>Paragraph No: ML.A.901(b)(4), penultimate paragraph, Scope</p> <p>Comment: The proposed restriction on the validity of an ARC issued by personnel not licenced in accordance with Part 66 when transferring the aircraft to another Member State, appears to be unjustified and could be considered not to align with the principle that there should be free movement of goods and services within the EU. Aircraft holding a valid EASA CofA and ARC are entitled to circulate freely within the EU.</p> <p>Justification: Free movement of goods and services within the EU.</p> <p>Proposed Text: Delete the penultimate paragraph of ML.A.901(b)(4)</p>	
284	3. Proposed amendments — 3.1. Draft	37 - 38	<p>Page No: 37</p> <p>Paragraph No: ML.A.904, Airworthiness review of aircraft imported</p>	

	Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.904 Airworthiness review of aircraft imported within the EU		within the EU Comment: The text for ML.A.904 is for aircraft imported into the EU (ML.A.903 refers to aircraft transfers within the EU), the paragraph heading is therefore incorrect. Justification: Text correction. Proposed Text: Amend paragraph heading to read: “ML.A.904 Airworthiness review of aircraft imported within into the EU”	
285	3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — AMC ML.A.302(c) Aircraft maintenance programme	47 - 48	Page No: 47 Paragraph No: AMC ML.A.302(c) Aircraft maintenance programme Comment: The AMC to ML.A.302(c) does not explain how to apply the data contained in the tables. Some worked examples would assist in their correct application. Justification: Clarity and consistent application of the AMC material.	