

Continuing airworthiness Update

AG.012
6-Dec-2023

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Your safety is our mission.

Topics

- Rules Amendments
- Rule development
- Other implementation and evaluation activities

Regulation amendments

Regulation (EU) 2021/1963 (applicable December 2022)

- SMS in Maintenance (transition findings to be closed by 2-Dec-2024)
- Industry standard SM-0001 to be considered as AMC – gap analysis and review of standard ongoing

Regulation (EU) 2022/401 (applicable March 2022)

- “One CAMO” for air carriers business groups

Regulation (EU) 2022/1360 (applicable Aug 2023) (not yet in Easy Access)

- Alignment with Part-21 “Light”
- AMC/GM published 20-Oct-2023

Regulation (EU) 2023/203 (applicable 22 Feb 2026) (not yet in Easy Access)

- Management of cybersecurity risks for aviation safety for CAMO and P145 organisation* and competent authorities (including P66 licencing authority) (*except those solely involved with Part-ML aircraft)
- AMC/GM published 13-Jul-2023

Regulation (EU) 2023/989 (applicable July 2024) (not yet in Easy Access)

- Efficiency in aircraft maintenance licencing (e.g. OJT, legacy aircraft type endorsement, basic knowledge)
- AMC/GM published 02-nov-2023, including update of the aircraft type ratings (RMT.0541)



Description

RMT.0255 addressed shortcomings linked to the effectiveness and efficiency of the licencing system requirements:

1. type rating endorsement for ‘legacy aircraft’
2. on-the-job training (OJT)
3. deficit of practical skills of maintenance personnel
4. obsolescence of the Basic Knowledge (BK) syllabus

Regulation (EU) 2023/989 was published on 23 May 2023 and the EDD on AMC&GM published on 02-Nov 2023.



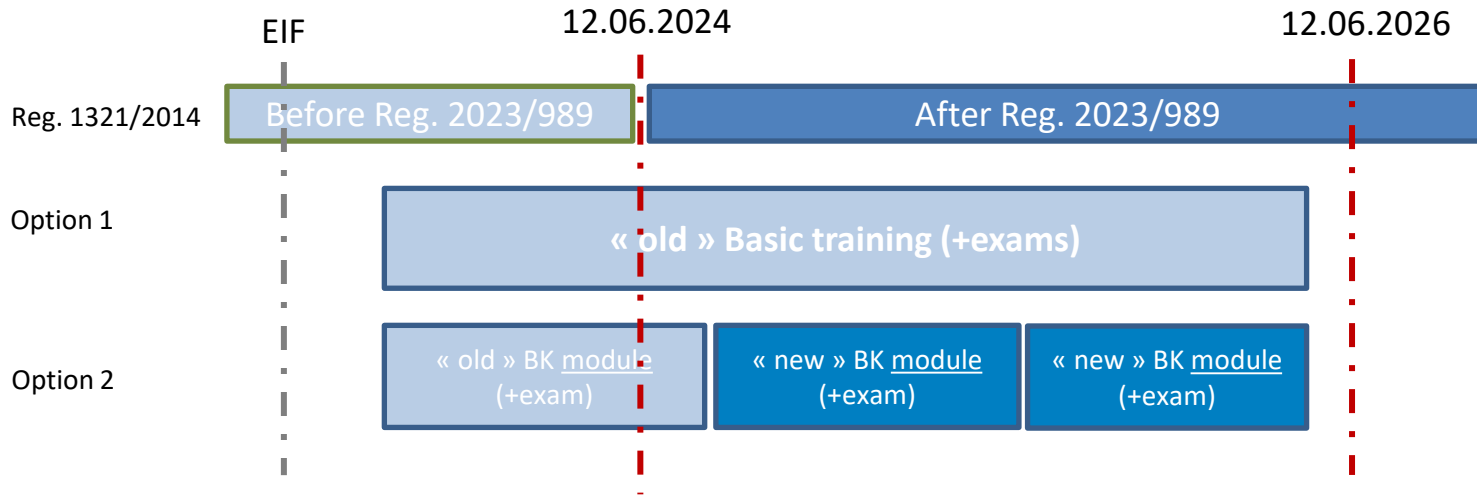
Main novelties

- CMPA definition added to Regulation (EU) No. 1321/2014
- Module chapters remain in the rule, but the content of the chapters moved to AMC, allowing for AltMoC application
- Provision for Alternative Means of Compliance (AltMoC) introduced – point 66.B.2
- OJT process is expanded and shifts focus on understanding maintenance certification as much as technical knowledge
- Provisions are introduced for Competent Authorities cooperation in examination crediting recognition – point 66.B.400

Regulation (EU) 2023/989

Article 6(4): Any basic training course, *or part thereof*, that commenced before 12 June 2024 shall be finished, including any related examination, before 12 June 2026. The corresponding certificates of recognition shall also be issued before 12 June 2026.

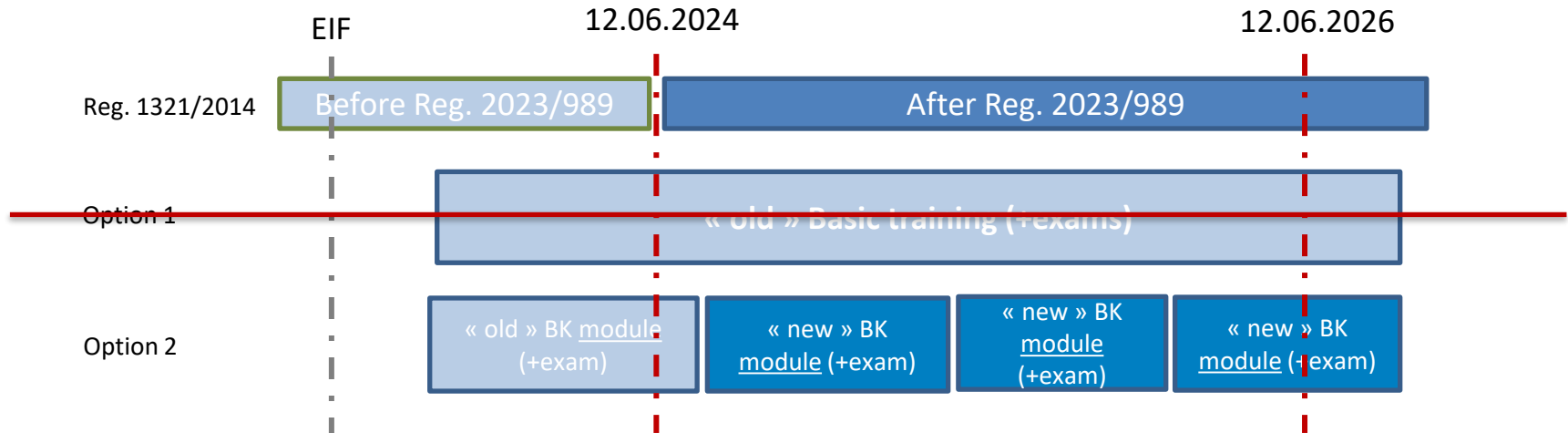
Case a): basic training courses started before 12.06.2024 and foreseen to be completed*
before 12 June 2026



Regulation (EU) 2023/989 (cont'd)

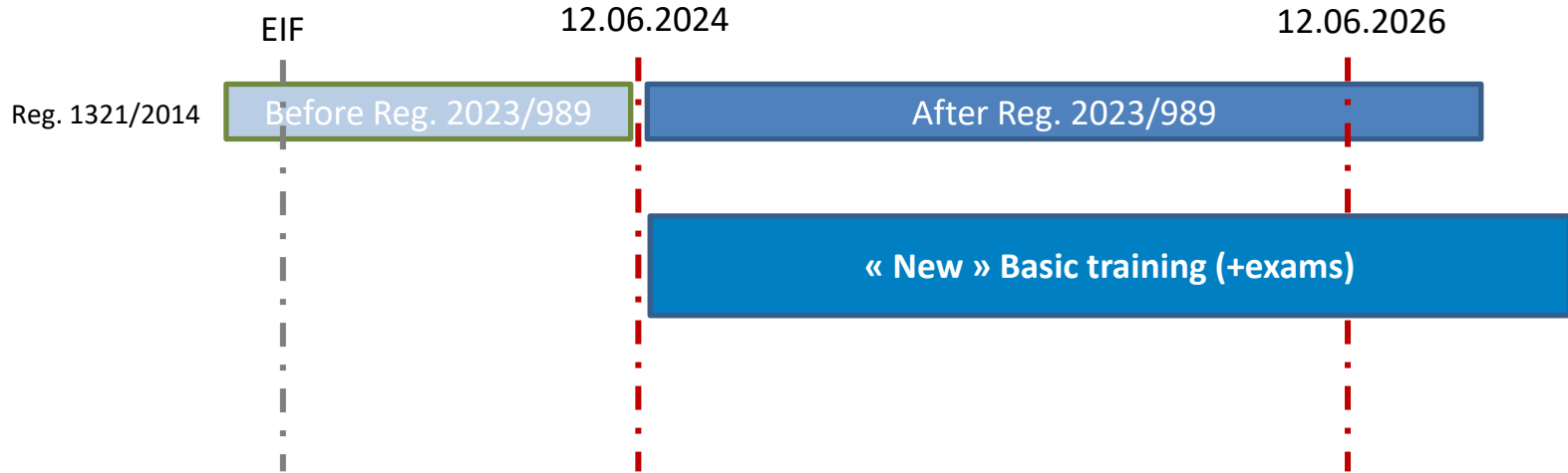
Article 6(4): Any basic training course, or part thereof, that commenced before 12 June 2024 shall be finished, including any related examination, before 12 June 2026. The corresponding certificates of recognition shall also be issued before 12 June 2026.

Case b): basic training courses started before 12.06.2024 and foreseen to be completed*
after 12 June 2026



Regulation (EU) 2023/989 (cont'd)

Case c): basic training courses started after 12.06.2024



Rules development – overview

- **Unmanned aircraft Systems (RMT.0230)**
 - CAW of certified UAS operated in the ‘specific’ category
 - Opinion No 03/2023 published on 30-Aug-2023
- **New Air Mobility (RMT.0731 subtask 1)**
 - Continuing airworthiness of non-conventional aircraft, including electric and hybrid propulsion aircraft
 - Opinion Q4/2023
- **Review of Part-147 (RMT.0544)**
 - Improve structure/consistency in Part-147 and address fraud & language proficiency
 - NPA Q4/2023
- **Enabling electronic personnel licences (RMT.0737)**
 - Electronic aircraft maintenance licences
 - NPA Q1/2024
- **ACAM (RMT.0588)**
 - ToR 2027
- **Import of Aircraft + Airworthiness Review (+ Occurrence Reporting) (RMT.0278/RMT.0521/RMT.0681)**
 - Opinion Q3/2024
- **Responsibility of B1/B2 certifying staff and support staff (RMT.0097)**
 - Webinar and policy paper Q1/2023
 - Opinion 2025
- **Regular update of CAW Reg (RMT.0735)**
 - ToR Q4/2023
 - Consideration of NPA 2013-12 (RMT.0096) (amendments of foreign Part-145 approvals)
 - NPA Q3/2024
- **Non-installed equipment (RMT.0727 Subtask 3)**
 - Contribution for CAW aspects
 - NPA Q3/2024

RMT.0230 – Introduction of a regulatory framework for the operation of drones

➤ Description

RMT.0230 Subtask 1 introduce requirements for the CAW of **certified UAS** used for high-risk operations in the ‘**specific**’ category

1. New Delegated Regulation
 - for the continuing airworthiness standards (**Part-ML.UAS**)
 - for a new CAW org. approval (**Part-CAO.UAS**) to implement these CAW standards
2. New Implementing Regulation for related Competent Authority requirements



NPA 2022-06 published on 30.06.2022. Opinion No 03/2023 published on 30-Aug-2023.
EASA committee (Orientation discussion) held on 18-October 2023

➤ Main novelties

- Consideration of the Control and Monitoring Unit (CMU) in the CAW processes
- Certified UAS solely used for low-risk operation (in the ‘specific’ category) do not have to comply with the new Reg.
- No maintenance licence proposed for UAS in the ‘specific’ category (hence no independent certifying staff and no maintenance training organisation).
 - However, minimum requirements and CAO.UAS authorisation for certifying staff instead
- No provisions for ‘pilot-owner maintenance’

RMT.0731 – New Air Mobility (Subtask 1)

Description

RMT.0731 aims (through its Subtask 1) to ensure the CAW of electric and hybrid propulsion aircraft through:

1. drafting new requirements in the field of Part-M/-145/-66/-147/-ML/-CAMO/-CAO, which are technology neutral
2. drafting new requirements related to OSD to request TCH developing a set of information

NPA 2021-15 published on 21 Dec 2021. The Opinion currently planned Q4/2023.

Main novelties

- Introduction of category B1.E for small electrical aeroplanes only
- Introduction of OSD requirement for any other electrical/non-conventional aircraft.
The TC Holder would:
 - propose which existing AML category better fit the aircraft concept
 - perform a gap analysis between the basic knowledge requirements for said category and the novelties of the new aircraft
 - prepare a training syllabus for the topics that are not covered.
- Introduction of Basic Knowledge Module 18 – electrical powerplant to be required for obtaining a B1.E category AML
- Introduction of high voltage training



Description

RMT.0544 targets areas for improvement in the field of MTO focusing on:

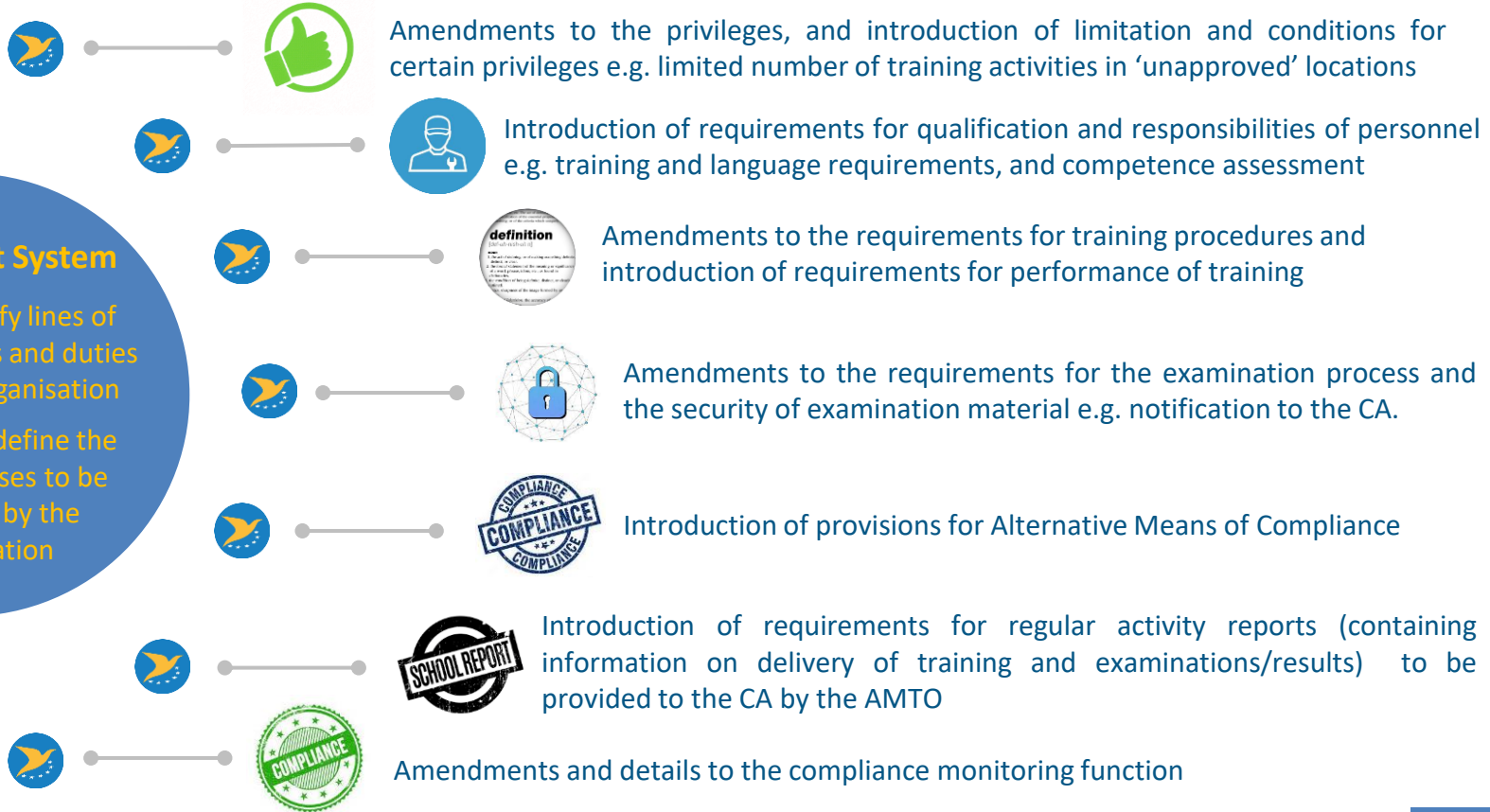
1. eliminate or reduce the examination cheating and fraud within Part-147 organisations
2. ensure that students correctly understand the subjects taught during the training in terms of language used
3. enhance the consistency of the Part-147 with other annexes of Regulation (EU) No 1321/2014
4. improve the structure and readability of Part-147 and align its terminology with the other annexes of Regulation (EU) No 1321/2014

The NPA is in final stage of publication and will introduce a revision to the entire Annex.

RMT.0544 – Review of Part-147 (cont'd)

Management System

- clearly identify lines of responsibilities and duties within the organisation
- identify and define the main processes to be described by the organisation



RMT.0737 - Enabling electronic personnel licensing

Description

Cross-domain rulemaking task aligning EU regulations with ICAO Annex 1 (new § 5.3 for EPL) and focusing on two aspects:

1. The set up of NAA systems for issuing EPLs
2. The establishment of common technical requirements for EPL itself

RMT will allow Member States to issue Electronic Personnel Licences (EPLs) for:

- Flight crew
- Air traffic controllers
- **Maintenance certifying staff** (electronic AML)

Key principles

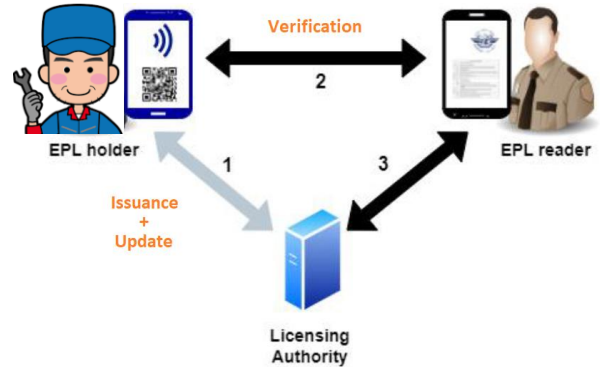
→ For Member States (MSs)

- Each Competent Authority will be able to choose **if** and **in which proportion/scope** they will issue EPLs (optional)
- They will **have to recognise** EPLs issued by other MSs
- Each AML will have to be issued **either in paper** or **electronic format** (EPL)

RMT.0737 - Enabling electronic personnel licensing (cont'd)

→ For the electronic AML

- It will be displayed on a **'self-contained mobile electronic visual display device'** (e.g. mobile phone)
- It will **replicate** the information contained in the NCA's records using a **common form** (e.g. Annex 1 appendix)
- Its authenticity and validity will be verifiable **online** and **offline**



Timeline & content

Q1/2024: NPA with proposed amendments to Part-66 IR + AMC/GM

Open to public consultation

2025: Opinion

2026: Adoption Regulation + ED Decision

RMT.0097 – Functions of B1 and B2 support staff and responsibilities



Description

Compared with NPA 2014-11, a simplified scope/extent is being considered for this RMT.0097:

1. Clarify role, responsibility and duties of certifying staff, support staff and authorised staff in base (but also in line) maintenance
2. clarify the expected level of verification by support staff (or certifying staff) of the tasks performed by authorised staff
3. Clarify the associated records and authorisation

NPA 2014-11 published on 13 Sep 2014. The Opinion currently planned in 2025 (pending resource allocation).



Other references

- EASA published a ‘Policy Paper on the roles and responsibilities of personnel involved in aircraft line and base maintenance’ in March 2023, available on EASA website
- EASA held a Webinar on the same subject in January 2023, available on the *Together4Safety* YouTube channel

Other implementation & evaluation activities

- **Guidelines:** Guidelines on the use of electronic documents, records, and signatures

- Published 5-May-2023, see [here](#)



- **Webinar:** Introduction of SMS in Part-145

- 24-Nov-2023 - for [EU NCA](#)



- **RMT.0731 Subtask 4:** CAW rules for airships

- Support from LBA/DGAC in drafting the RMT

- **eRules:**

- Revision of Easy Access Rules for CAW

- **Research:** UAS operation simulation with LBA & DLR

- Participation in the project for UAS maintenance and inspection aspects (OSO#3 and #07)

- **Research:** evaluation of UAS-related Industry Standards for use as AMC (Shepherd)

- Participation in the project for UAS maintenance aspects (OSO#3)

- **Survey:** survey on component maintenance licences/qualification

- senior management decision expected 2024

- **Best intervention strategy (BIS):** multi-transport-mode aircraft

- Focus consultation to be launched before end 2023
- Regulatory proposal for additional CAW considerations for aircraft subject to multi use (e.g. air & road)



Thank you

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