

CAW rulemaking update

P&CA TeB meeting 27 & 28 Nov 2019

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Content

- Recent publications
- Ongoing rulemaking tasks (RMTs)
- Other RMTs

Recent publications

- **Reg (EU) 2019/1383** (and corrigendum) “**GA + SMS CAMO + Tech Records**”
 - Entry into force 24 Sep 2019
 - Applicable from 24 March 2020 (AMC/GM to be published before)

- **Reg (EU) 2019/1384 : MCF and mixed operation**

- **ED Decision 2019/024/R** Aircraft Type Ratings for Part-66 aircraft maintenance licence

Ongoing RMTs

- RMT.0255 Review of Part-66 (next ToR 2019Q2)
- RMT.0544 Review of Part-147 (next ToR 2019Q2)
- RMT.0018 Inst parts without EASA Form 1 (next Opinion before the end of 2019)
- RMT.0106 CS-MCSD (next Decision 2019Q4)
- RMT.0731 New Air Mobility (next ToR 2020Q1)
- RMT.0251 SMS Phase II (next Opinion 2020Q3)
- RMT.0097 B1 & B2 Support Staff (next Opinion 2021Q3)
- RMT.0278 Import of aircraft (next Opinion 2021Q3)
- RMT.0521 Airworthiness Review (AR) process (next Opinion 2021Q3)

RMT.0255 Review of Part-66

Why are we doing the task

The specific objective of this task is to address some shortcomings identified on the EASA maintenance licensing system linked to effectiveness and efficiency of the current requirements, namely:

- Type rating endorsement for the 'legacy aircraft';
- On job training (OJT);
- Deficit of practical skills for maintenance personnel; and
- Obsolescence of the Basic Knowledge syllabus.

In addition, this RMT will also address the topics previously included within RMT.0281 as relevant to Part-66: e-learning and distance learning; simulation devices or STDs; specialised training such as HF, FTS, continuation training and blended teaching methods.

What are we doing

ToR is going to be sent to AB for consultation. A working group will be created.

Controversial issues: none at this stage

→ **Evaluation Report (02/03/2018); ToR 2019-Q2; NPA 2020-Q3;
Opinion 2021-Q3**

RMT.0544 Review of Part-147

Why are we doing the task

This rulemaking task aims to update the requirements linked to maintenance training organisations to ensure that they fit for purpose (first update its initial issue). In addition will focus on some identified shortcomings identified in “Evaluation Report”, such as mechanisms to eliminate or reduce the examination cheating and fraud.

In addition, this RMT will also address the topics previously included within RMT.0281 as relevant to Part-147: e-learning and distance learning; simulation devices or STDs; specialised training such as HF, FTS, continuation training and blended teaching methods.

What are we doing

ToR is going to be sent to AB for consultation. A working group will be created.

Controversial issues: none at this stage

→ **Evaluation Report (02/03/2018); ToR 2019-Q2; NPA 2020-Q3;
Opinion 2021-Q3**

RMT.0018 Inst. parts without EASA Form 1

Why are we doing the task

Components can only be installed if accompanied with EASA Form 1 or equivalent (except standard parts and raw material). Some parts are not designed or manufactured specifically for aviation use (light bulbs, fire axes, smoke detectors,...). This task assesses a more proportionate and efficient requirements to allow the installation of components based on the safety consequences should the component fail.

What are we doing

Allow that parts with negligible safety effect in case of failure, as identified by the TC holder, would not need an EASA Form 1 when used as spare part for installation during maintenance. Also the Agency will have the opportunity to identify such parts in CS-STAN for Standard changes/repairs.

Controversial issues as proposed in the NPA: MCL classification (number and definition); relying on TCH to develop the parts' MCL; need of EASA Form 1 as CRS for maintenance; DO/PO missing relation when no POA; impact on bilateral agreements.

→ **NPA 2017-19; Opinion before end 2019; Decision 2020-Q3**

RMT.0106: CS-MCSD (Maint. Cert Staff Data)

Why are we doing the task

Part-21 requires that the minimum syllabus of maintenance certifying staff type rating training and the determination of type rating (Operational Suitability Data - OSD) to be included in the application for a type-certificate or restricted type certificate for an aircraft.

What are we doing

Developing the Certification Specification for Maintenance Certifying Staff Data (CS-MCSD) and guidance for classification of changes to the OSD in accordance with Part 21.A.91.

73 comments received to the NPA.

Controversial issues: Different interpretations and definition of the minimum syllabus. Some RMT member's position is for a minimal syllabus that, in the Agency's opinion, does not fulfil the scope.

→ **NPA 2018-11; Decision 2019-Q4**

RMT.0731: New Air Mobility

Why are we doing the task

The current CAW Reg were initially designed for conventional fixed wing aircraft, rotorcraft, balloons and sailplanes. The rules assumed that propulsion is mostly provided by piston or turbine engines using fossil fuels. This scenario is not appropriate for non-traditional new aircraft and there is the need to adapt the rules accordingly.

What are we doing

The purpose of this RMT is to amend some continuing airworthiness Parts, where necessary, to address new technologies. A general principle that will govern this RMT is to ensure that future requirements are technology-neutral where possible, while ensuring legal certainty. Related regulatory changes affecting in particular Part-66 and Part-147 would be done in coordination with RMT.0255 and RMT.0544, respectively. EASA has identified the need to coordinate this activity with RMT.0230 ('UAVs'). In a future subtask, vehicles with dual use (aerial and terrain) could be also addressed (TBC).

Controversial issues: Not many expected, the existing continuing airworthiness concepts are not affected.

→ **ToR 2020-Q1, NPA 2020-Q3; Opinion 2021-Q1**

RMT.0251 SMS Phase II

Why are we doing the task

To introduce SMS requirements (ICAO Annex 19) and related authority oversight and management system requirements for Part-145 organisations.

What are we doing

Keeping Part-145 structure (harmonised with Part-CAMO) except for the new management system-related provisions.

Controversial issues: introduction of AltMoc and proposed AMC found too prescriptive; findings for management system (level 3/observations?); fatigue of maintenance personnel; transition.

NPA Comments: 1064 comments for Part-145 (around 3000 in total)

→ **NPA 2019-05(C); Opinion 2020-Q3; Decision 2021-Q3**

RMT.0097 B1/B2 support staff and resp.

Why are we doing the task

Introduce principles for increased robustness of the maintenance certification process eliminating potential 'safety gaps' by clarifying the roles and responsibilities of certifying staff, support staff and 'sign-off' staff, both in line and base maintenance

What are we doing

Modify Part-145 and related AMC/GM to clarify the role and duties of the B1 and B2 support staff and the link with other maintenance personnel (personnel authorised to sign off and unauthorised personnel), including the use of sign-off and unauthorised personnel both in line and base maintenance.

Controversial issues: level of supervision of the certifying staff to the maintenance personnel

→ **NPA 2014-11; Opinion 2021-Q3; Decision 2022-Q3.**

RMT.0278 Importing of a/c

Why are we doing the task

Develop criteria for importing of aircraft from other regulatory systems and Part 21 Subpart H review.

What are we doing

Amending Part-21 and Part-M in order to guarantee their consistency with regard to the issuance of a Certificate of Airworthiness (C of A) and an Airworthiness Review Certificate (ARC) and to take into consideration cases not covered by the rule (importing state aircraft, importing without an airworthiness statement).

Controversial issues: validity of airworthiness statement issued by a third country, import without an airworthiness statement, details of the airworthiness review for import.

→ **NPA 2016-08; Opinion 2021-Q3; Decision 2022Q3.**

RMT.0521 Airworthiness review process

Why are we doing the task

To introduce an improved framework to mitigate the risks linked to a faulty airworthiness review with potential safety consequences where the actual airworthiness status of the aircraft is below the standard.

What are we doing

- Providing clearer requirements/guidance on those aspects creating interpretation and standardisation problems (e.g. content of AR and sample checks)
- Eliminate inefficiencies in the system (e.g. need of recommendations)
- Facilitate the transfer of aircraft between MSs

Controversial issues: process to transfer of aircraft between MSs and description of the content of the AR (e.g. operational items)

→ **NPA 2015-17; Opinion 2021-Q3; Decision 2022-Q3.**

Other RMTs

→ Merged

- RMT.0281 New teaching & training tech (tasks merged into RMT.0255 and 0544).

→ Deprioritised

- RMT.0217 CAMO's & Part-145 AMO's responsibilities

→ Cancelled

- RMT.0209 (M.014) Contract CAW activities

Thank you

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