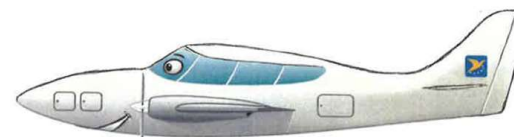


# Part ML, Part CAO Implementation Issues

Summary of identified issues from the implementation

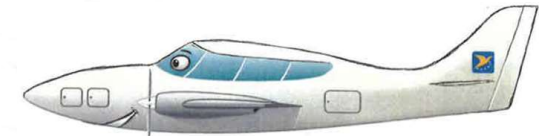
*Andreas Winkler/AIR, Oct 2020*

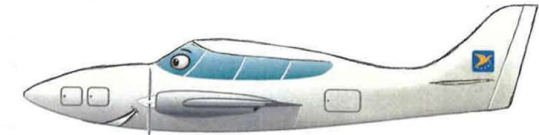


## Identified issues from the implementation – ML/CAO

- Transfer to New CAW Regimes – ML/CAO (ACG)
- ARC Extension – New EASA Form 15c (ACG)
- Part 21 versus ML – Import/Transfer (ACG)
- ACAM in GA (CAA-BE)
- AMP Maintenance Program responsibility (CAA-BE)
- Part CAO Implementations – Workload for Organisations (ECOGAS)
- TBO extension – responsibility - insurance

**Tool for questions/comments/sharing info is needed**





# Transferring between CAW regimes CAMO to CAO, M to ML





## Transfer to New CAW Regimes – ML/CAO Issue

- With the implementation Part CAO, the organization has changed **CAMO to CAO**.
- **New Part CAO approval number** has been issued.
- Is the aircraft **still in the same controlled environment?**
- **Different ARC Forms** (EASA Forms 15 a, b, c)
- Possible to **extend the ARC?**



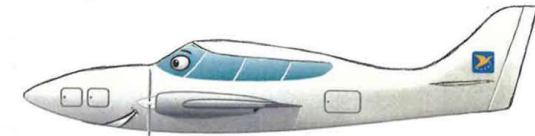


## Transfer to New CAW Regimes – ML/CAO Response/Solution

**No transition measures** in the Reg. (EU) No 1321/2014 related to controlled environment.

If the reference to the approval has changed, **as long as the holder** of the former CAMO approval certificate and the holder of the new CAO approval certificate is the **same legal person**, EASA considers that if the rest of the **controlled-environment conditions are satisfied**, it is **possible to extend** the ARC by the CAO in charge

**Same legal organization = Same controlled environment**



# ARC Extension in controlled environment

## New EASA Form 15c



## ARC Extension – New EASA Form 15c Issue



- With Part ML, **new ARC Form 15c** has been implemented.
- **Aircraft** within the existing controlled environment **does** have that Form **15c**.
- Is the **ARC extension on the existing Forms 15a, b** possible?





## ARC Extension – New EASA Form 15c Response/Solution

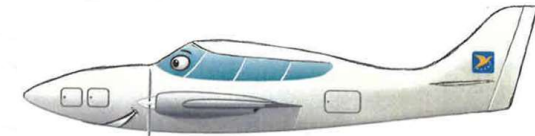
Any extension **needs to be formalised on the EASA Form 15c Issue 3.**

How the first issue of the ARC (EASA Form 15a or 15b under Part-M) is retroactively traced/formalised on the EASA Form 15c could be done in **various ways**, similar to what is acceptable under M.A.903(b) provisions for the transfer of registration within EU (see AMC M.A.903(b)).

We **recommend to make clear that the original issue** of the valid ARC was established on an EASA Form 15a, b or 15c Issue 1 which was issued before 24 March 2020. **(Note on 15c)**

**Part ML requires latest Form 15c**





# Part 21 versus ML

## Transfer of Registration within the EU or Import into the EU

## Part 21 versus ML – Import/Transfer Issue



With Part ML an **ARC recommendation is no longer existing**. Part **21.A.174(b)3** still requires an ARC recommendation.

- **Initial ARC** for 3rd country **imports** of used aircraft
- **Correction of aircraft registration** on the ARC for used ML aircraft transferred to another member state





## Part 21 versus ML – Import/Transfer EASA Response/Solution

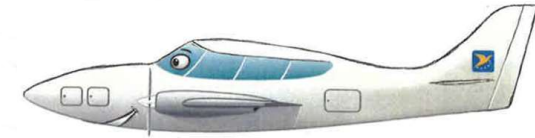
**Inconsistency** between Part-ML and 21.A.174(b)(3) mentioned exist and is **identified – Interim Solution?**

EASA is working with the Commission to **fix** this at the next opportunity (**with 07/2019** expect to be adopted **this year**)

Proposal in 21.A.174

a recommendation for the issuance of a certificate of airworthiness or restricted certificate of airworthiness and for an airworthiness review certificate pursuant to an airworthiness review in accordance with Annex I (Part M) to Regulation (EU) No 1321/2014 **or an airworthiness review certificate in accordance with Annex Vb (Part-ML) to Regulation (EU) No 1321/2014**

**Regulatory change in progress**



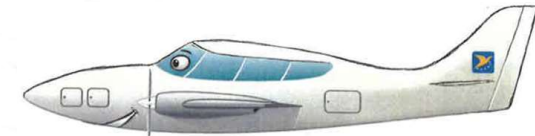
## Part 21 versus ML – Import/Transfer Interim Solution - Discussion

**Inconsistency** between Part-ML and 21.A.174(b)(3) mentioned exists and is **identified – Interim Solution?**

- Take **ARC** as “**recommendation**” when needed by Part 21 for Issuance of NAA-ARC to fulfill Part 21.B.325(c) **to issue an initial ARC** for used aircraft imported into the EU **or**
- **Article 71** (as proposed regulation)
- **Revise Aircraft registration** on existing ARC during transfer within the EU

**ARC as recommendation**

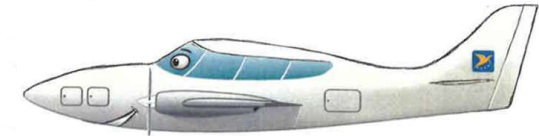
austro  
CONTROL



# ACAM

## How to organize a proportionate ACAM program for GA?

## ACAM in GA Issue



**ACAM concept is not referenced** in Section A of regulation.

- Intention of ACAM **misunderstood by owner**
- NAAs may have some **difficulties to organize** this type of program in GA



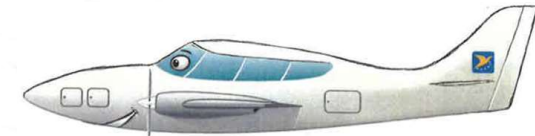


## ACAM in GA Discussion

ACAM program is mainly a **data catching tool** to get a good picture about the condition of your fleet and implement following measures such as safety promotion or improvement measures to the quality of performance of CAMO/CAO organizations.

- **Sharing best practice** between NAA's
- **Information to Owners** would be helpful

**Information and Exchange**



# AMP Maintenance Program Responsibility understood by the Owner?



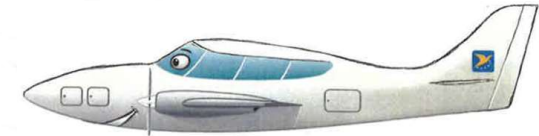
## AMP Maintenance Program responsibility Issue



Is the responsibility and the required action understood by the owner?

- Is it clear what is needed for an **AMP after unforeseen event** or long term storage?
- Do we need more information regarding “**Alternate Maintenance Actions**” in ML.A.302(c)
- Should the **AMP updated/revised** within the ARC cycle?



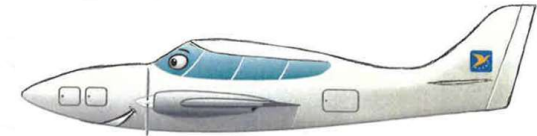


## AMP Maintenance Program responsibility Discussion

Is the existing GM/AMC sufficient?

- The owner/CAO is responsible, so they must develop and declare/approve the AMP for “special cases”
- Alternate Maintenance does not mean “Do nothing”, the MIP is the minimum?
- Owner/CAO is responsible for CAW including AMP update, safety net is ARC

**Safety Promotion for AMP development needed**



# Part CAO Implementation Additional Workload for Organisations



## Part CAO Implementations – Workload for Organisations Issue



Organisations/NAA reported **difficulties** during the Part CAO implementation

- **Additional Workload** for the Organisation – COVID19 add on?
- Missing a Generic **Sample CAO Manual (CAE)**



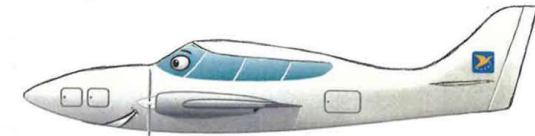
## Part CAO Implementations – Workload for Organisations Discussion



What could be done to reduce the additional workload for the organisations?

- **Extension** of the Part CAO implementation **period**?
- Is the existing guidance in **AMC1 CAO.A.025 sufficient?** (user guide Issued Jan 2020)  
<https://www.easa.europa.eu/sites/default/files/dfu/Guide%20for%20transition%20to%20Part-CA%28M%29O%20-%20revision%20Jan%202020.pdf>
- Sharing a **Part CAO Sample Manual/Exposition (CAE)?**

Reduction of the Workload



# TBO Extension Responsibility - Insurance



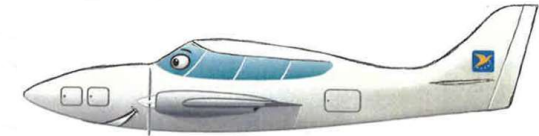
## TBO Extension – Responsibility - Insurance Issue



Authority is no longer responsible for approving a request for an engine/component **TBO extension**. This **responsibility** is now given to Continuing Airworthiness and Maintenance Organizations.

- Organisation **responsible** in case of **accident or incident**
- **Insurance** companies are not willing to cover the organization concerned





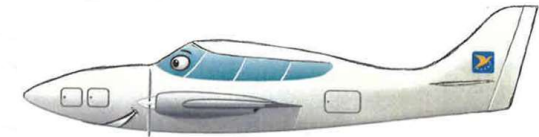
## TBO Extension – Responsibility - Insurance Discussion

Facts from the regulation and ML development

- More “**freedom in TBO**” was a wish from the community
- **Owner**, when responsible could extend
- **TBO is recommendation**, not an airworthiness limit
- Owner/CAMO/CAO has the best **data** for potential extension
- **AMC1 ML.A.302(c)** provide more **details of aspects to be considered** than part M

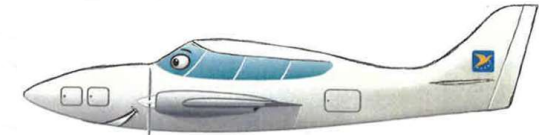
**TBO recommendation**





# Discussion Systematic Solutions





## Systematic Solutions for an improved transition

### Proposal

- **Focal point @EASA** for sharing of questions related to implementation of ML, CAO
- Continuous update of the **FAQ List** (EASA –GA Section FAQ Maintenance)
- Extension of the **transition periode?**
- Sharing of Tools, Presentations and Informations for better implementation between NAA&industry . **@EASA GA toolbox**

### Maintenance

#### GA Toolbox

- [CS-stan reporting](#)
- [Documents Guidance and Examples](#)
- [FAQ on General Aviation](#)
- [GA Leaflets: Flying in the EU](#)
- [Licensing for General Aviation](#)
- [Operations in General Aviation](#)



Safe Landings in GA!

austro  
CONTROL

