As agreed, the information coming to all will be sent in English language, thank you!

EASA EM.TEC - COVID-19
Flexibility Continuing Airworthiness

The EASA EM.TEC (Engineering and Maintenance Technical Committee) has collected from its full members and alternate members all inputs regarding Continuing Airworthiness issues caused by the COVID-19 challenges to the aviation industry and especially for the Maintenance Organisations and their tasks to keep the aircraft in a good shape to keep the high standard in aviation safety.

If you do have any further concerns, challenges or other inputs for more areas to be able to assure Continuing Airworthiness for any aircraft in your responsibility, please do not hesitate to contact any person you know being an Advisory Body or Tech Committee Member in either the SAB, EM.TEC or DM.TEC to take these to the attention of EASA.

Find the e-mail from Erik Moyson (our Vice-Chair of the EM.TEC) as attachment.

Below you will find information from Mrs Julia Egerer (Strategy Development Officer – Stakeholder Management – EASA) sent to the EASA SAB (Stake-holder Advisory Body):

Dear SAB members and alternates,

With this email, we would like to seek your input on how EASA can support you. We thank you for your continuous support and feedback to EASA during those difficult times. We very much appreciate your feedback during the recent consultations. At EASA we understand that these are unprecedented times for the European industry, and we are ready to support you.

Some of the areas, where EASA has provided support are already mentioned on the dedicated website shown below:

https://www.easa.europa.eu/coronavirus-covid-19

We believe that the SAB should be the main sounding board of industry's feedback and is a good forum to propose & discuss solutions. Therefore, we invite you to provide to EASA any additional suggestions, ideas and inputs you might have on how EASA can support you in those difficult times.
……..

For the Information:

M. GISEL (Member ECOGAS and EASA EM.TEC)

e-mail Text from Erik Moyson to EASA:

First of all, we would like to thank EASA for its exemption template to support Member States in a collective and harmonised adoption of exemption measures to extend the validity period of licences, ratings, certificates and attestations of aircrew, instructors, examiners, mechanics, air traffic controllers and aeromedical examiners.

Hereby we would like to address another emerging concern in the area of continuing airworthiness such as the lack of availability of MROs to comply with the approved Aircraft Maintenance Programs over the next months.

Background
Indeed, some operators have identified that MROs have stopped working following COVID-19 restrictions imposed by several governments which will have a knock-on effect on aircraft due for a major check: MRO supply will be distorted, plenty of aircraft will require maintenance to return to service for summer operations, which would lead to a lack of available slots. Major maintenance checks are typically scheduled during the low season to have the aircraft available during the high summer season. Without enough available MRO slots, operators will have to postpone these checks to the summer season which means that the aircraft cannot be operated when they are needed most to generate revenues desperately needed to survive this corona-crisis. Finally, the exemption to extend the training to crew will be of little use when the aircraft required to requalify crew are grounded for overdue maintenance. Most MROs continue their activities with self-isolation, mandatory lockdowns would only worsen the problem. Some OEMs have closed elements of their facility and therefore spare parts may also be an issue…
It would be helpful to have some additional flexibility from the EASA and Member States regarding maintenance tasks interval extension to ensure that summer operations are not affected, and maintenance checks can be staggered in the subsequent months.

EM.TEC consultation
A consultation with the Engineering & Maintenance Technical Committee (EM.TEC) was undertaken on short notice during the past two days. Feedback was received from 23 individuals from 15 different associations/organisations (A4E, AEA-E, AEI, AIAC, AIRE, ARSA, ASD, EAMTC, EBAA, ECOGAS, EHA, EIMG, ERA, IATA, IATP) that identified several more issues of concern in the CAW domain that need some additional flexibility provisions to cope with the on-going corona-crisis.

1. *Stop the clock of calendar time intervals*
   Maintenance task intervals are defined in terms of flight hours, flight cycles and calendar time. Even if operators fly less or not all, maintenance tasks with calendar intervals must be complied with. Calendar time intervals for scheduled maintenance tasks of the approved AMP should be halted ("Clock Stoppage") provided the aircraft is in maintenance or preserved status (see hereunder).
   Obviously, "Clock Stoppage" does not apply to ADs, LLPs, CMRs, AWLs... Any such overdue items must be complied with before return to service. For scheduled maintenance tasks that have been halted, the clock restarts at Maintenance Release.

2. *Storage / preservation of aircraft*
   Operators and any organisation responsible for the aircraft continuing airworthiness shall make sure that the Aircraft Maintenance Programme includes all the necessary instructions for preservation (parking & storage) of the aircraft or that the instructions in the AMM are correctly executed. Some DAH may not be very keen to support the postponement of maintenance accomplishment for aircraft that were parked or stored in conditions that do not meet certain criteria. An EASA SIB on this matter may help.

3. *Flexibility expiration date Airworthiness Review Certificate*
   The problem is twofold: the ARC expires because the inspector cannot travel to perform the physical inspection; and the calendar items become overdue due to the aircraft being blocked in locations without assistance. The industry would appreciate some flexibility such as a few months grace period for the ARC expiration dates and keeping the Flight Conditions Approval Support active to issue a permit to fly allowing the aircraft with expired maintenance items to be positioned to a suitable maintenance location.

4. *Escalation maintenance tasks*
   Any extensions of flight hours, flight cycles and calendar time must be based on demonstrating an acceptable level of safety. The maintenance intervals are based on detailed safety analysis and cannot be deviated from without analytical underpinning and regulatory approval. EASA may be able to support extensions and most programs have a 10% variation/tolerance option written into the Approved Maintenance Programs, any further extension would need agreement form the OEM.
   It is very unlikely the life limited parts and tasks with a hard time would get extended as they are deemed to be mandatory. This could lead to fragmented work scopes where the hard time tasks are carried out and the remainder are deferred (see splitting maintenance checks hereunder).
   Operators should first coordinate with their DAHs / OEMs and then request the extension would be an easy acceptance for EASA and the Competent Authority who will work on a case by case basis. TCH/STCH/DAH can assess deviations from recommended maintenance intervals and therefore can support operators and MROs in that respect by providing a DOA approved deviation from applicable ICA.

5. *Splitting maintenance checks*
   If an operator has a grouped AMP FH/CY/calendar-driven maintenance tasks and packaged these in letter-checks (C1, C2…), any split of this AMP is subject to approval by the Competent Authority, unless this is already covered in the AMP. A possible alleviation would

be an automatic approval to split these checks. The operator would have the option of performing a minimum set of tasks during the maintenance event without having to undergo the AMP approval process with the CA.

6. *Temporary line maintenance base*
   Apart from maintenance checks, the MRO industry would appreciate some guidance for extending the privilege of opening a temporary line maintenance base. Some States allow to open a base for 40 days while UK-CAA has a 6 months period. With aircraft parked at other airports, preservation tasks must be performed regularly. Due to this exceptional situation a standard approach/EASA guidance would be welcomed.

7. *Calibration: Tool & Equipment*
   Calibration may be overdue due to shipping interruptions or availability of staff at suppliers. More flexibility is needed in dealing with calibration e.g. postponing of calibration based on trend analysis of past 3 calibrations. The calibration date for equipment that can only be calibrated by external parties, should be enhanced. This should be based on a risk analysis, which considers the previous performance and reliability of the equipment.

8. *Training / Continuation Training*
   Due to interruptions of business, internal (continuation) training may also be affected besides licensed staff. More flexibility is needed training / continuation training.
   Apart of the licensing issue, the staff authorisations should generally remain valid: due dates for continuation training or practical experience (6 months in 2 years) should be enhanced by the duration of the crisis in case no alternative method of training (e.g. virtual classroom) would be applicable.

9. *Audits*
   Internal and external audit findings may require postponement due to availability of staff or other interferences; it may not be possible to implement corrective actions in due time. Subcontractor audits cannot be performed due to travel restrictions or limitations. Some flexibility is needed in dealing with findings and corrective actions of audits.
   Due to travel restrictions internal audits at several facilities may be difficult. The internal audit schedule should be suspended for the time of the crisis. Due dates for the implementation of corrective actions should be extended, too. Due dates for supplier/sub-contractors audits should be postponed.

10. *Approved Vendor List*
    The periodic sending out of questionnaires may be hampered by reduced personnel, or by reduced or late feedback/reply from vendors.

EM.TEC request to EASA and Competent Authorities
Industry is in desperate need for appropriate and pragmatic levels of flexibility to be applied by EASA and the Competent Authorities, whilst ensuring the highest level of aircraft safety is maintained.

i. *It would be helpful to have some flexibility from EASA and the Member States regarding above identified issues in the Continuing Airworthiness domain. Such would truly complement the measures already coordinated with EASA and Member States on personnel licensing and organisation approvals.*
ii. *The operators, MRO industry and authorities must ensure that aircraft safety is kept at the highest level when any relaxations and flexibility are considered. The operators and MRO industry propose to work very closely with the Authorities in this regard. Regarding the requested 'exemptions' (subject to authority approval), reference was made to already existing bulletins such as OSAC BI 2020/03 issued by DGAC France.*
iii. *Regarding extensions, we would suggest aiming at 3-6 months. It seems that it may be 12 weeks before a staggered authorisation to work will be granted. A fixed extension today would just have to be extended 2 months down the road.*
iv. *We would suggest EASA/NAAs to empower the respective CAMOs (who regulatorily were implemented to be a third party responsible for airworthiness) to make some of the requested decisions here above.*
v. *Finally, the industry would also appreciate if EASA could share with the industry (operators, CAMO, Part-145) the guidelines provided to the NAAs.*

On behalf of the EM.TEC,
Yours sincerely,
Erik Moyson
Vice-chair of the EM.TEC

For Info – Members in EM.TEC:	Armin Knobel, RUAG	for EHA
	Marcel Gisel, SVFB	for ECOGAS (4 members of ECOGAS are also members in the SAB)