



European Aviation Safety Agency

**EASA Part 145 organisations
outside the EU
The Accountable Manager
The Quality Manager**

Cologne, 29 April 2013

Reference: EASA D (2013) KSP/MGO/ABR/145 NAAs/51975
Subject: **Information to all Foreign EASA Part 145 organisations -
maintenance release of aircraft not covered by the basic Regulation**

EASA Regulation Reference: EC (N°) 216/2008 Art 1, EC (N°) 2042/2003 Art 1.1

Dear Sir/Madam,

We would like to inform you that the EASA's interpretation on "maintenance release of aircraft not covered by the Basic Regulation" has been published on its website:
<http://www.easa.eu.int/rulemaking/faq/commission-regulation-2042-2003-continuing-airworthiness.php>.

This interpretation applies to those aircraft which are excluded from complying with the airworthiness requirements contained in the Basic Regulation EC (N°) 216/2008 and its Implementing Rules for airworthiness EC (N°) 2042/2003 and EU (N°) 748/2012.

The aim of this letter is to explain to all Foreign EASA Part 145 organisations holding an "A" rating (A1, A2, A3 or A4) and to the inspectors overseeing these approvals on behalf of EASA the following:

- The appropriate use of the EASA Part-145 maintenance release.
- The appropriate identification in the EASA MOE of the scope of the EASA Part-145 maintenance release.
- The various maintenance release practices identified during EASA surveillance audits.
- The EASA position in relation to each of those practices and in which cases findings would be raised.

Line or base maintenance release of aircraft not covered by the Basic Regulation:

1. Practice 1 of EASA's published interpretation

When an approved EASA Part 145 organisation issues a release according to EASA Part 145.A.50 using their EASA Part 145 approval number, such a release is issued outside the privileges granted by the EASA Part 145 approval. Therefore, the EASA inspector shall raise a finding against EASA Part 145.A.50 requirements.

2. Practice 2 of EASA's published interpretation

When an approved EASA Part 145 organisation issues a release under the aviation regulation (aviation code) of the State of Registry (SoR) and is using its SoR dedicated maintenance approval number, EASA does not have objections about this practice regardless of whether the aviation code of the SoR is also called "Part-145" ("**practice 2a**" of the attached Annex) or not ("**practice 2b**" of the attached Annex). The reason is that there is no possible confusion since the organisation is signing with the SoR dedicated maintenance approval number and this release falls completely under the SoR responsibility.

3. Practice 3 of EASA's published interpretation

When an approved EASA Part 145 organisation issues a release under the aviation regulation (aviation code) of the State of Registry (SoR) and there is no dedicated maintenance approval number granted by the SoR (the organisation still refers to the EASA approval number), two different cases have been identified:

1. The aviation code of the SoR is also called "Part-145" ("practice 3a**" of the attached Annex).**

EASA does not have objections about this practice as long as:

- i. the release statement clearly identifies that this is a release under the aviation law of the SoR **and**
- ii. the organisation provides evidence that the SoR aviation laws allow this practice and the use of the EASA approval number.

This release falls completely under the SoR responsibility.

However, if those two conditions are not met, and the release statement is identical to the EASA Part-145 one, the EASA inspector shall raise a finding against EASA Part 145.A.50 requirements. The reason is that a confusion exists of whether this is an EASA release or not, taking into account that the organisation is also referring to the EASA approval number.

Note: In the case of line maintenance, the associated CRS is typically recorded by the maintenance staff in the A/C technical logbook, which is designed by the operator. In this case, if the operator has pre-printed a release statement which is identical to the EASA Part-145 release, it is acceptable that this statement is crossed out and replaced by an statement which clearly identifies that it is a release under the aviation law of the SoR. The release may still refer to the EASA approval number.

2. The aviation code of the SoR is not called "Part-145" ("practice 3b**" of the attached Annex).**

EASA does not have objections about this practice as long as:

- i. the organisation provides evidence that the SoR laws allow this practice and the use of the EASA approval number.

This release falls completely under the SoR responsibility.

Please find attached an Annex table summarizing the various cases addressed above and some examples of possible wording of the maintenance release.

Maintenance Organisation Exposition (MOE):

The Foreign EASA Part 145 organisations are requested to make sure that the Statement of the Accountable Manager (145.A.70(a)1) clearly states that the procedures detailed in the MOE apply only to aircraft covered by the Basic Regulation EC (N°) 216/2008 and its implementing Rules for airworthiness, EC (N°) 2042/2003 and EU (N°) 748/2012.

Considering that the Foreign EASA Maintenance organisations have been already requested in June 2010 (ref.: EASA letter N° EASAD(2010)/KSP/MGO/BEP/145MOAs/527610) to revise their Maintenance Organisation Exposition to ensure that this document is exclusively dedicated to EASA approvals (Part 145, Part M Subpart G), EASA does not require the Foreign Part 145 organisation to immediately issue a MOE revision just for the modification of the Accountable Manager's statement. However this amendment shall be included at the first opportunity and no later than by the end of 2013.

With best regards



Karl Specht
Continuing Airworthiness Organisations Manager

Enclosure: Annex table
Cc: Accredited NAAs / EASA team leaders