# Part-M General Aviation Workshop

GIPAG views and proposals

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# Introduction

- **GIPAG gathers more than 70 companies performing :**
  - Maintenance (Part-M/F and Part-145)
  - Aerial Works
  - Training (flight & maintenance)
  - Airfields operations management
  - Etc.

- **GIPAG got several points of views among its members from :**
  - the user side : M/F and 145 maintenance organisations
  - the customer side : aerial works and training companies, private pilots, etc.

# Format of the rules

- **A far too complex regulation, designed for Commercial Air Transport with large airplanes**
  - Unusefull administrative workload
  - Unjustified costs
  - Tangling of responsibilities

- **Philosophy of the rules**
  - No need for two different approvals : G vs F / 145 ?
  - M/F or 145 org should get automatically G approval
  - « process oriented » skills

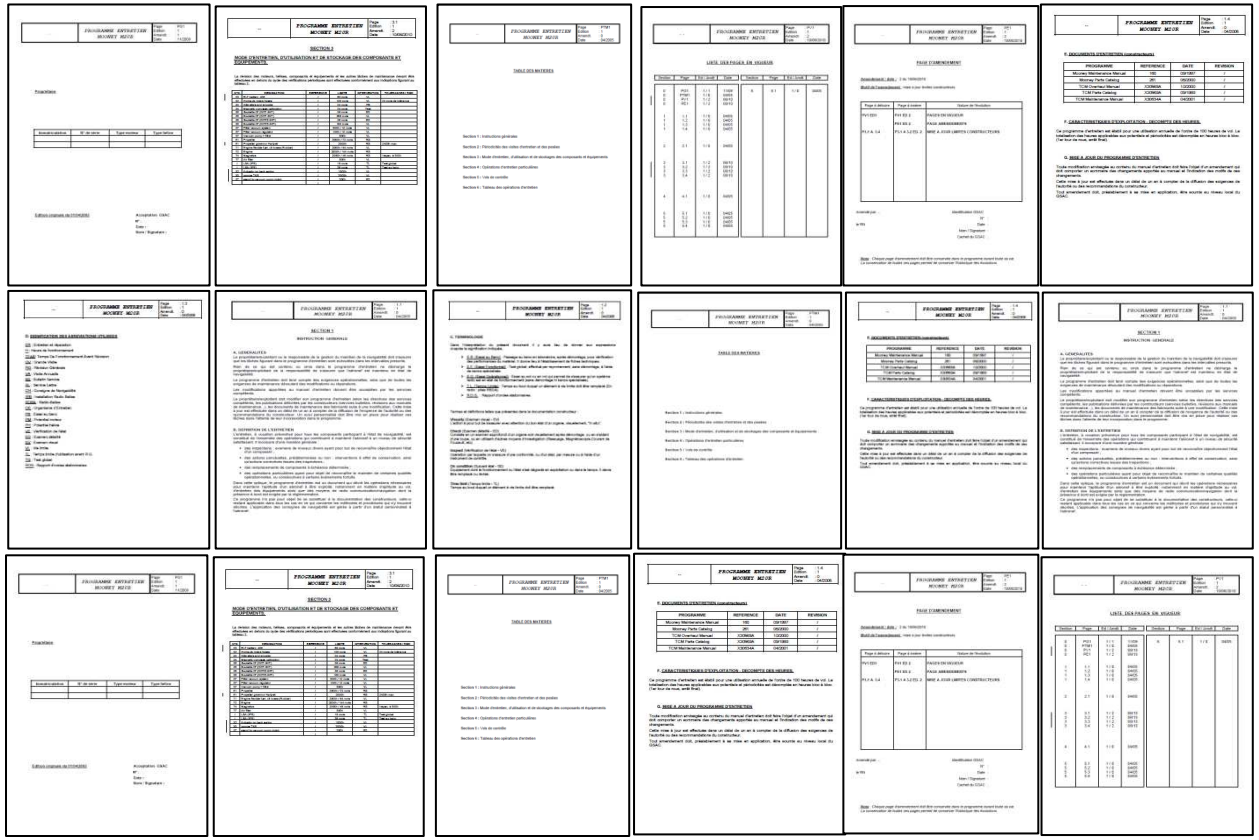
- **Language of soft-law (AMC, GM)**
  - Safety issue : english proficiency ?
  - In the meantime: a way to go around english ?
  - Recommendation : AMC translated in all the languages of EU as for regulations

# Generic Maintenance Programmes and indirect approval procedures

## First issue : standardisation

### 1 A MP in one EU country

### 2 A MP in another EU country



# Generic Maintenance Programmes and indirect approval procedures
## Second issue : added-value of MP ?

- **We recommend a drastic simplification of Maintenance Programmes, even abandon the notion**

1. **Who knows the best its product : the manufacturer**

2. **Who defines the maintenance tasks to be performed on its product : the manufacturer**

3. **How does the CAMO « decide » which maintenance tasks should be performed : by reading the manufacturer (and potentially the authority) instructions**

- **What is the added-value of the MP ? Summarising the informations that any CAMO should know how to find**

- **What are the drawbacks of a MP ? An huge administrative workload to approve a « copy-paste » process**

# Generic Maintenance Programmes and indirect approval procedures
## Third issue : costs

- **Generic maintenance programmes ?**
  - Not used by our companies

- **Why ?**
  - high (and unjustified) fees to add an aircraft type on the rating

- **Unjustified because the CAMO skills are process oriented**

# Approval / Acceptance of repairs and modifications

- A unique focal point whatever the outsourcing method chosen by EASA
- Acceptance of US STC
- Listing of all STC

# Acceptance of components from US and Canada

- Recognition of FAA Form 8130 under some conditions
- Listing of all EASA approved organisations in EU and Third Countries

# Scope of work authorized to independent certifying staff

- **GIPAG supports maintenance in a controlled environment**

- **General feeling : independent staff have much less regulatory constraints and control than certified organisations :**
  - Shouldn't it be the opposite ??

- **Independent staff = same maintenance than certified organisations with much less constraints**
  - Reasons for living of Part-M/F and to some extent 145 in GA ?

# Licensing requirement for certifying staff

- **Lack of type training for GA aircraft**
  - A possible solution : a manufacturer footbridge

- **Experience required for full part-66 licence**
  - Requirement to be downgraded from IR to AMC : 2 or 3 years arbitrary and too long for some people

# Performance of the airworthiness review and issuance of ARC/recommendation

- COfA delivered for unlimited duration, provided annual inspection is satisfactory
- Too many time and planning constraints : avoidable costs !
- Grant I privilege with F approval

## Other

- ICA for components

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