



Explanatory Note to Decision 2023/019/R

Review of Part-66

RELATED NPA/CRD: 2020-12 — RMT.0255 (MDM.059)

New training methods and new teaching technologies

RELATED NPA/CRD: 2014-22 — RMT.0281 (MDM.082)

Amendments to the Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) No 1321/2014

EXECUTIVE SUMMARY

Regulation (EU) 2023/989 amended Regulation (EU) No 1321/2014 ('Continuing Airworthiness (CAW) Regulation') as regards the requirements on maintenance licences and training organisations set out in Annex III (Part-66) and Annex IV (Part-147) to the CAW Regulation, introducing, among others, new training methods and teaching technologies and other improvements as part of the regular update of Part-147. In particular, amendments were introduced in order to:

- facilitate the type rating endorsement of aircraft when there are no organisations approved in accordance with Part-147 offering type training on that aircraft, maintaining the same level of safety and a level playing field;
- update the basic knowledge training syllabus in Part-66;
- enhance the efficiency of the 'on-the-job training' (OJT) required for the first type rating endorsement in the maintenance licence category;
- enhance the efficiency of the maintenance personnel training system with new training methods and new teaching technologies;
- improve and correct the elements that emerged with the implementation of the CAW Regulation.

This Decision amends the Acceptable Means of Compliance (AMC) & Guidance Material (GM) to the CAW Regulation in order to support the implementation of the CAW Regulation.

Domain:	Maintenance and continuing airworthiness management
Related rules:	AMC & GM to the CAW Regulation
Affected stakeholders:	Aircraft maintenance licence (AML) holders; approved maintenance training organisations (AMTOs); approved maintenance organisations (AMOs) (Part-145 and Part-CAO); national competent authorities (NCAs)
Driver:	Training effectiveness and competence
Impact assessment:	Yes
Rulemaking group:	Yes

EASA rulemaking procedure milestones

RMT	Start Terms of Reference	Public consultation NPA	Proposal to the Commission Opinion No 07/2022	Adoption by the Commission Implementing Regulation (EU) 2023/989	Decision Acceptable Means of Compliance, Guidance Material
RMT.0255	14.8.2019	NPA 2020-12: 1.12.2020	6.9.2022	22.5.2023	31.10 2023
RMT.0281	19.11.2012	NPA 2014-22: 9.9.2014			



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1. About this Decision

The European Union Aviation Safety Agency (EASA) developed Decision 2023/019/R in line with Regulation (EU) 2018/1139¹ (the 'Basic Regulation') and the Rulemaking Procedure².

Rulemaking task RMT.0255 (Review of Part-66) and RMT.0281 (New training methods or new teaching technologies) is included in Volume II of the European Plan for Aviation Safety (EPAS) for 2023-2025³. RMT.0281 was included in the EPAS version for 2019-2023⁴, but it was de-prioritised in accordance with criteria described in Chapter 3 of that EPAS version.

The scope and timescales of the tasks were defined in the related ToRs^{5&6}.

EASA developed the *draft* text of this Decision based on the input of the two Rulemaking Groups (RMGs) RMT.0255 and RMT.0281. All the interested parties were consulted, in accordance with the Rulemaking Procedure, through NPA 2020-12⁷ (RMT.0255) and NPA 2014-22⁸ (RMT.0281).

The comments received to NPA 2020-12 and NPA 2014-22, from all interested parties, including industry and national competent authorities, have been reviewed by EASA and are now presented in the respective Comment-Response Documents (CRDs) 2020-12⁹ and 2014-22¹⁰. The proposals made in NPA 2014-22 were also presented to and discussed with stakeholders in a specific workshop¹¹ held on 22 September 2014 in Cologne.

Based on the input from both consultations, on 6 September 2022 EASA published Opinion No 07/2022. The Opinion was addressed to the European Commission, which adopted Regulation (EU) 2023/989 on 22 May 2023¹² based on the Opinion.

¹ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139>).

² EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 01-2022 of 2 May 2022 on the procedure to be applied by EASA for the issuing of opinions, certification specifications and other detailed specifications, acceptable means of compliance and guidance material ('Rulemaking Procedure'), and repealing Management Board Decision No 18-2015 (<https://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-01-2022-rulemaking-procedure-repealing-mb>).

³ [European Plan for Aviation Safety \(EPAS\) 2023-2025 | EASA \(europa.eu\)](https://www.easa.europa.eu/easa/epas/2023-2025)

⁴ <https://www.easa.europa.eu/en/document-library/general-publications/european-plan-aviation-safety-2019-2023>

⁵ <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0255-mdm059-0>

⁶ <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0281-mdm082>

⁷ <https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2020-12>

⁸ <https://www.easa.europa.eu/en/document-library/notices-of-proposed-amendment/npa-2014-22>

⁹ <https://www.easa.europa.eu/en/document-library/comment-response-documents/crd-2020-12>

¹⁰ <https://www.easa.europa.eu/en/document-library/comment-response-documents/crd-2014-22>

¹¹ https://www.easa.europa.eu/sites/default/files/dfu/Workshop%20presentation%20RMT.0281_MDM.082%20220914.pdf

¹² Commission Implementing Regulation (EU) 2023/989 of 22 May 2023 amending Regulation (EU) No 1321/2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks, and correcting that Regulation (OJ L 135, 23.5.2023, p. 53) (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3A0J.L_.2023.135.01.0053.01.ENG&toc=OJ%3A2023%3A135%3ATOC).



EASA developed the *final* text of this Decision with the acceptable means of compliance (AMC) & guidance material (GM) based on the input from the public consultations and published the Decision on the Official Publication¹³ of EASA.

¹³ <https://www.easa.europa.eu/official-publication>



2. In summary — why and what

2.1. Why we need to amend the AMC and GM — issue/rationale

Commission Implementing Regulation (EU) 2023/989 was published on 23 May 2023.

This Regulation amends the CAW Regulation¹⁴ as regards the requirements on maintenance licences and training organisations set out in Annex III (Part-66) and Annex IV (Part-147) to the CAW Regulation. In addition, Articles 2 and 6 of the CAW Regulation were amended.

The AMC & GM to Article 6, Part-66 and Part-147 need to be revised in order to support the implementation of the new amendments.

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. This Decision will contribute to achieving the overall objectives by addressing the issues described in Section 2.1.

The main specific objective(s) of this Decision are, therefore, to support the implementation of the amendments introduced through Regulation (EU) 2023/989 by:

- facilitating the type rating endorsement of aircraft for which no Part-147 type training is available, maintaining the current level for safety and a level playing field;
- updating the basic knowledge training syllabus in Part-66 since it contains some obsolete references;
- enhancing the efficiency of the ‘on-the-job training’ (OJT) required for the first type rating endorsement in the maintenance licence category; and
- enhancing the efficiency of the maintenance personnel training system with new training methods and new teaching technologies.

¹⁴ Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014R1321&qid=1687340326106>).

2.3. How we want to achieve it — overview of the amendments

The following AMC and GM are either amended or introduced with this Decision:

AMC or GM reference	Addition/amendment
GM1 Article 6(4) and 6(5) Requirements applicable to training organisations and competent authorities issuing licenses	New GM to facilitate the understanding of the requirements during the transition period
GM1 Article 6(6) Requirements applicable to training organisations and competent authorities issuing licenses	New GM to facilitate the transition to the new Basic Knowledge requirements
GM1 66.A.5 Aircraft groups	Amendment of the GM to reflect the new definition of Group 1
GM1 66.A.20(a) Privileges	Minor editorial changes
AMC1 66.A.30(a) Basic experience requirements GM1 66.A.30(a) Basic experience requirements AMC1 66.A.30(e) Basic experience requirements	Amendment of the AMC and new GM regarding the basic experience requirements for category C licence
GM1 66.A.45 Endorsement with aircraft ratings GM1 66.A.45(h)(ii) Endorsement with aircraft ratings	Amendment of the GM to reflect the new definition of Group 1
GM1 66.B.2 Means of compliance	New GM explaining the provisions for AltMoC
AMC1 66.B.2(b);(c) Means of compliance	New AMC introducing provisions for the processing of AltMoC
GM1 66.B.2(b);(c) Means of compliance	New GM addressing the case of no AMC for requirements in the regulation
AMC1 66.B.115 Procedure for the change of an aircraft maintenance licence to include an aircraft rating or to remove limitations	Amendment of the AMC to reflect the changes to the OJT procedure
GM1 66.B.400(d) General	New GM explaining the provisions for the cooperation of NCAs in the process of examination crediting
AMC 1 Appendix I – Basic Knowledge Requirements (except for category L licence) Section 2 All MODULES	New AMC for the basic knowledge modules of Appendix I, with more descriptive content for the syllabus
AMC1 Appendix I – Basic knowledge requirements (except for category L licence) Section 3	New AMC for the integration and usage of new training devices or teaching technologies
AMC1 Appendix II – Basic examination standard (except for category L licence)	New AMC providing the acceptable number of questions for the submodules
AMC1 Appendix III Aircraft type training and type evaluation standard – on-the-job training (OJT) Section 1	Amendment of the AMC for the integration and usage of new training devices or teaching technologies
GM1 Appendix III Aircraft type training and type evaluation standard – on-the-job training (OJT) Section 1(c)	New GM to provide clarification regarding the cases of type-different trainings

AMC or GM reference	Addition/amendment
AMC1 Appendix III Aircraft type training and type evaluation standard – on-the-job training (OJT) Section 3	New AMC for the integration and usage of new training devices or teaching technologies
AMC1 Appendix III Aircraft type training and type evaluation standard – on-the-job training (OJT) Section 3.1(d)	Amendment of the AMC for the integration and usage of new training devices or teaching technologies
AMC1 Appendix III Aircraft type training and type evaluation standard – on-the-job training (OJT) Section 4.1	New AMC for the integration and usage of new training devices or teaching technologies
AMC1 Appendix III Aircraft type training and type evaluation standard – on-the-job training (OJT) Section 6	Amendment of the AMC to reflect the changes to the OJT procedure
AMC1 Appendix VII Basic knowledge requirements for category L aircraft maintenance licence	New AMC for the basic knowledge modules of Appendix VII, with more descriptive content for the syllabus
AMC1 Appendix VIII — Basic examination standard for category L aircraft maintenance licence	New AMC providing the acceptable number of questions for the submodules
Appendix I to AMC to Annex III — Aircraft Type Ratings for Part-66 Aircraft Maintenance Licences	Amendment to the aircraft type rating list
Appendix II to AMC to Annex III — Aircraft Type Practical Experience and On-the-Job Training — List of Tasks	Amendment of the Appendix to correct some editorial errors in relation to balloons and to provide new selection criteria for OJT tasks
GM1 Appendix II to AMC to Annex III – Aircraft Type Practical Experience and On-The-Job training – List of Tasks	New GM to provide an example of OJT tasks to be carried out
GM1 147.A.100 Facility requirements AMC1 147.A.100(i) Facility requirements GM1 147.A.100(i) Facility requirements AMC1 147.A.105 Personnel requirements AMC1 147.A.105(f) Personnel requirements GM1 147.A.105(f) Personnel requirements AMC1 147.A.115(a) Instructional equipment GM1 147.A.115(a);(d) Instructional equipment AMC1 147.A.130(a) Training procedures and quality system AMC1 147.A.145(c) Distance learning via uniform resource locator (URL) addresses	Amendment of the AMC and GM further to the new requirements introduced by new training methods and teaching technologies for personnel and instructional equipment
AMC1 147.A.200(f) Approved basic training course	Amendment of the AMC to clarify the minimum participation criteria
AMC1 147.A.300 Aircraft type / task training AMC1 147.B.10(b) Competent authority	Amendment of the AMC for the integration and usage of new training devices or teaching technologies
AMC1 CAO.A.025 Combined airworthiness exposition (CAE)	Amendment of the AMC to add point B.13 Procedure for the issue of a recommendation to the competent authority for the issue of a Part-66 licence in accordance with point 66.B.105

2.4. What are the benefits and drawbacks of the amendments

The AMC and GM that are issued with this Decision do not create any impacts beyond those that were created by the related Regulation (EU) 2023/989.

Note that the regulatory impact assessments, as presented in NPA 2020-12 and NPA 2014-22, remain unchanged. Please refer to Chapter 4 of NPA 2014-12 and Section 2.4 of NPA 2020-12 for details.



3. How we monitor and evaluate the amended AMC and GM

EASA will monitor and evaluate the effectiveness of the amendments to the AMC and GM as outlined in Section 2.7 of Opinion No 07/2022, once this Decision becomes applicable. Action might be triggered through the feedback collected from the implementation of Regulation (EU) 2023/989.



4. References

4.1. Related EU regulations

- Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (OJ L 362, 17.12.2014, p. 1)

4.2. Related EASA decisions

- Decision 2015/029/R of 17 December 2015 issuing acceptable means of compliance and guidance material to Part-M, Part-145, Part-66, and Part-147 of Regulation (EU) No 1321/2014 and repealing Decision 2003/19/RM of the Executive Director of the Agency of 28 November 2003
- Decision 2020/002/R of 13 March 2020 amending the Acceptable Means of Compliance and Guidance Material to Annex I (Part-M), Annex II (Part-145), Annex III (Part-66), Annex IV (Part-147) and Annex Va (Part-T) to as well as to the articles of Commission Regulation (EU) No 1321/2014, and issuing Acceptable Means of Compliance and Guidance Material to Annex Vb (Part-ML), Annex Vc (Part-CAMO) and Annex Vd (Part-CAO) to that Regulation
- Decision 2019/009/R of 28 March 2019 amending the Acceptable Means of Compliance and Guidance Material to Annex I (Part-M), Annex II (Part-145), Annex III (Part-66), Annex IV (Part-147) and Annex Va (Part-T) to Commission Regulation (EU) No 1321/2014 and issuing the Acceptable Means of Compliance and Guidance Material to the articles of Commission Regulation (EU) No 1321/2014



5. Related documents

- CRD to NPA 2020-12 'Review of Part-66' (RMT.0255 (MDM.059))
- CRD to NPA 2014-22 'New training methods and new teaching technologies' (RMT.0281 (MDM.082))

