

Maintenance Annex Guidance

Between the
European Union Aviation Safety Agency (EASA) for the
European Union
and
Agência Nacional de Aviação Civil (ANAC) for
Brazil



THE MAINTENANCE ANNEX GUIDANCE (MAG) APPROVAL:



THIS IS TO CERTIFY APPROVAL BY:

Original signed by Bruno Diniz Del

Bel

Head of the Department of Flight
Standards (SPO)

Agência Nacional de Aviação Civil

Date: ____ / ____ / ____

Original signed by Jesper Rasmussen

Flight Standards Director

European Union Aviation Safety
Agency

Date: ____ / ____ / ____

<p>Revision History</p> <p>Maintenance Annex Guidance</p>

Revisions to this guidance shall be approved by the Joint Sectorial Committee on Maintenance. Revisions become effective upon signature of the revised document.

Revision#	Revision Description	Signed on
Original	Original Edition of the Maintenance Annex Guidance	11/06/2015
Revision 1	<ul style="list-style-type: none"> - Correction of formatting and typing errors. - References updated: <ul style="list-style-type: none"> o F-900-73 changed to F-900-81 o EC N°2042/2003 changed to EU N°1321/2014 o Section A - Appendix 1: EASA and ANAC contacts updated - Clarification included: <ul style="list-style-type: none"> o Section A - II o Section B - I, II, III o Section B - Appendix 2, Chapter 10, 18 o Section B - Appendix 5 o Section C - I, II, III o Section C - Appendix 2, Chapter 3, 7, 8, 9, 10, 16 o Section C - Appendix 3 o Section C-Appendix 4 - Updated definitions: <ul style="list-style-type: none"> o ANAC Foreign 145 Group o Approved Data o Line Station o Special Condition 	16/06/2016
Revision 2	<ul style="list-style-type: none"> - Regulation (EC) No 216/2008 updated to Regulation (EU) 2018/1139. - Removed reference to Specific Regulatory Requirements. - Updated ANAC departments due to organizational changes. 	

	<ul style="list-style-type: none"> - Section A – II Definitions updated, mainly to describe new ANAC departments involved in the MAG implementation. - Section A – II – 2, 3 and 5. Revised in order to provide clarification regarding SIS inspections. - Section A – IV and V. Removed the Specific Regulatory Requirements and updating the Special Conditions. - Section A –VI – Appendix 1 – Acronyms. - Section A –VI – Appendix 2 – Updated Contacts. - Section A –VI – Appendix 3 to 6. Revised Visit Reports and check lists. - Section B – I – 2, 3 and II – 2, 3. Included clarification regarding demonstration of need, approval expiration date. - Section B – II – 1. Included clarification regarding necessity to verify EASA Special Conditions at additional locations and line stations. - Section B – IV. Included information regarding communication of suspension and revocation. - Section B – V Appendix 2. Updated EASA supplement, mainly chapters 5, 10, 11, 13, 16, 18, 19 and 20. - Section B – V Appendix 3. Updated due to new special conditions. - Section B – V Appendix 4. Updated EASA application form EASA Form 18. - Section B – V Appendix 5. Updated Approval Letter Template. - Section C – I and II. Included clarification regarding demonstration of need, approval expiration date. 	
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	<ul style="list-style-type: none"> - Section C – II – 2.1. Included clarification regarding necessity to verify ANAC Special Conditions at additional locations and line stations. - Section C – IV. Included information regarding communication of suspension and revocation. - Section C – V - Appendix 2. Updated ANAC supplement, mainly chapters 4, 7, 10, 12, 16, 17, 19 - Section C – V - Appendix 3. Updated approval letter template. 	

SUMMARY

Introduction.....	10
Section A: Authority Interaction.....	11
I General.....	12
1 Purpose	12
2 Communications.....	12
3 Technical Consultations and Interpretations and Resolution of issues between ANAC and EASA.....	12
4 Joint Sectorial Committee on Maintenance (JSCM).....	12
5 Revisions	13
II Cooperation in Standardisation Activities	13
1 General.....	13
2 Implementation of the EU-EASA Standardisation in EU Member States.....	13
3 EASA and Sampling Inspection System in Brazil (SIS).....	14
4 Standardisation Activities within ANAC	17
5 ANAC and Sampling Inspection System in EU (SIS)	17
III Definitions.....	20
IV Special Conditions.....	22
1 General.....	22
2 EASA Special Conditions Applicable to Brazilian based Maintenance Organisations	23
3 ANAC Special Conditions Applicable to EU based Approved Maintenance Organisations	24
V Appendices.....	27
Appendix 1: Acronyms	27
Appendix 2: Contacts.....	29
EASA and ANAC contacts.....	29
Technical contacts of Aviation Authorities	29
Appendix 3: Visit Report ANAC Regional Office (SIS Form 10 BRA).....	30
Appendix 4: EASA Visit Report AMO (SIS Form 8 BRA).....	34
Appendix 5: Visit Report Member State NAA (SIS Form 10 EU)	37
Appendix 6: ANAC Visit Report AMO (SIS Form 8 EU).....	41
Section B: Approval Process for Brazilian Based Approved Maintenance Organisations	44
Introduction.....	45
I Initial Approval Process.....	45
1 ANAC Actions	45
2 Applicant Actions	45
3 ANAC/EASA actions	45

II	Continuation Process	46
1	ANAC Action	46
2	Applicant Actions	46
3	ANAC/EASA Actions	47
4	EASA Actions	47
5	Surrender of Approval	47
III	Amendment process	47
1	Applicant Actions	47
2	ANAC Actions	48
3	EASA Actions	48
IV	Suspension or Revocation	48
1	Suspension	48
2	Revocation	48
3	EASA and ANAC Actions	48
4	Communication	49
V	Appendices.....	49
	Appendix 1: EASA Supplement Contents	49
	Appendix 2: Example EASA Supplement	50
1	LIST OF EFFECTIVE PAGES	52
2	AMENDMENT PROCEDURE	52
3	INTRODUCTION	52
4	ACCOUNTABLE MANAGER'S COMMITMENT STATEMENT	52
5	APPROVAL BASIS AND LIMITATION.....	53
6	ACCESS BY EASA AND ANAC	53
7	WORK ORDERS/CONTRACTS	54
8	APPROVED DESIGN AND REPAIR DATA	54
9	AIRWORTHINESS DIRECTIVES	55
10	RELEASE AND ACCEPTANCE OF COMPONENTS.....	56
11	RELEASE OF AIRCRAFT AFTER MAINTENANCE.....	58
12	REPORTING OF UNAIRWORTHY CONDITIONS	59
13	QUALITY ASSURANCE SYSTEM (QAS)	59
14	PROVISION OF HANGAR SPACE FOR AIRCRAFT MAINTENANCE	61
15	CONTRACTED MAINTENANCE	61
16	HUMAN FACTORS	63
17	LINE STATIONS	64
18	WORK AWAY FROM FIXED LOCATIONS	64
19	ACCEPTABILITY OF MANUFACTURED/MAINTAINED PARTS	65

20	ENGLISH PROFICIENCY	65
	Appendix 3: Sample Audit Program, EASA Supplement Brazilian Maintenance Organizations	66
	Appendix 4: Application form (EASA Form 18)	68
	Appendix 5: Approval Letter Template	70
	Section C: Approval process for EU Based Maintenance Organizations	71
	Introduction.....	72
I	Initial Approval Process.....	72
1	Introduction	72
2	NAA Action.....	72
3	Applicant Action.....	72
4	NAA/ANAC Actions.....	73
II	Continuation Process	73
1	Introduction	74
2	NAA Actions	74
3	Applicant Actions	74
4	NAA and ANAC actions	74
5	Late Applications.....	75
6	Surrender of approval	75
III	Amendment process	75
1	Applicant actions	75
2	NAA/ANAC actions.....	76
3	ANAC Actions	76
IV	Suspension or Revocation	76
1	Suspension	76
2	Revocation	76
3	ANAC and NAA Actions	77
4	Communication	77
V	Appendices.....	78
	Appendix 1: ANAC Supplement Contents	78
	Appendix 2: Example ANAC Supplement	79
1	LIST OF EFFECTIVE PAGES	81
2	AMENDMENT PROCEDURES	81
3	INTRODUCTION	81
4	ACCOUNTABLE MANAGER’S STATEMENT	81
5	APPROVAL BASIS, SCOPE AND LIMITATION	82
6	SUMMARY OF THE QUALITY SYSTEMS	83

7	APPROVAL FOR RELEASE AND RETURN TO SERVICE AFTER MAINTENANCE OR ALTERATION	83
8	REPORTING OF FAILURES, MALFUNCTIONS OR DEFECTS AND SUSPECTED UNAPPROVED PARTS (SUP) TO ANAC	89
9	ADDITIONAL OPERATING LOCATIONS INCLUDING LINE STATIONS	89
10	WORK AWAY FROM A FIXED LOCATION	90
11	CONTRACTING / SUBCONTRACTING	91
12	MAJOR REPAIRS AND MAJOR ALTERATIONS	93
13	COMPLIANCE WITH BRAZILIAN AIR CARRIER'S CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM (CAMP).....	94
14	COMPLIANCE WITH MANUFACTURERS' MAINTENANCE MANUALS OR INSTRUCTIONS FOR CONTINUED AIRWORTHINESS (ICA).....	95
15	ANAC AIRWORTHINESS DIRECTIVES (AD)	96
16	QUALIFICATIONS OF PERSONNEL.....	96
17	CAPABILITY TO COMPREHEND THE PORTUGUESE LANGUAGE.....	96
18	RECORD KEEPING	97
19	AIRWORTHINESS VERIFICATION CERTIFICATE - CVA (FORMER ANNUAL MAINTENANCE INSPECTION - IAM).....	97
20	FORMS.....	100
	Appendix 3: Approval Letter Template	101

Introduction

1. The Brazilian requirements for maintenance are contained in Brazilian Civil Aviation Regulations RBAC 43 and 145.
2. The European Union requirements for maintenance are contained in Regulation (EU) 2018/1139 of the European Parliament and of the Council-Commission, and Regulation (EU) No 1321/2014, Annex II Part 145, as amended (hereafter referred to as EASA Part 145) and the respective EASA Acceptable Means of Compliance (AMC) and Guidance Material.
3. ANAC and EASA have established the differences between EASA Part-145 and RBAC 43 and 145. These differences led to the establishment of Special Conditions listed in Appendix B1 to Annex B to the Agreement. Any maintenance organisation of one Party that has been certified by a Competent Authority of that Party to perform maintenance functions shall be required to have a supplement to its maintenance manual in order to comply with the Special Conditions as per § 8 of Annex B. When it is satisfied that the supplement meets the Special Conditions set out in Appendix B1, the respective Competent Authority shall issue an approval attesting compliance with the applicable requirements of the other Party subject to scope of ratings and limitations not exceeding that contained in its own certificate.
4. This guidance, Maintenance Annex Guidance (hereinafter referred to as MAG), which is sub-divided into Sections A, B and C, details ANAC, EASA, Competent Authorities and applicant actions required to be taken in order for an ANAC Certificated RBAC 145 approved maintenance organisation (AMO) located in Brazil to maintain civil aeronautical products under the jurisdiction of a European Union Member State and for a EASA Part-145 approved maintenance organisation located in the EU to maintain civil aeronautical products under the jurisdiction of ANAC, in accordance with the Agreement on Civil Aviation Safety Between the European Union and Brazil and published in the Official Journal of the European Union.
5. Under the leadership of the Joint Sectorial Committee on Maintenance (JSCM), EASA and ANAC have agreed to organize, as appropriate, reciprocal participation in each other's internal standardization.

Section A: Authority Interaction

(Not applicable to the Industry)

I General

1 Purpose

1.1 The purpose of this Section of the Maintenance Annex Guidance (MAG) is to detail the interface procedures and activities between Agência Nacional de Aviação Civil (ANAC), the European Union Aviation Safety Agency (EASA) and National Aviation Authorities (hereafter “NAA”) of the EU member states required to implement the Annex B to the Agreement.

Note: In this MAG, a competent authority within EU is either EASA or an EU Member State Competent Authority which is referred as NAA, the acronym used within EU to designate the National Aviation Authorities.

2 Communications

2.1 Proposed significant revisions to the relevant laws, regulations, standards, acceptable means of compliance and guidance material which may affect the basis and the scope of this guidance, should be notified in a manner consistent with Article 8 of the Agreement. Accordingly, upon notice of such changes ANAC or EASA may request a meeting to review the need for amendment to this MAG.

2.2 The list of contact points for the various technical aspects of the MAG, including communication of urgent issues is included in Appendix 1.

3 Technical Consultations and Interpretations and Resolution of issues between ANAC and EASA

3.1 Technical Consultations:

a) ANAC and EASA agree to consult as necessary to provide input when requested on interpretations and technical issues. The frequency of these exchanges will depend upon the number and significance of the issues to be discussed.

3.2 Interpretations and Resolution of issues between ANAC and EASA

a) ANAC and EASA agree to address interpretations and resolve issues through consultation or any other mutually agreed-upon means. Every effort shall be made to resolve the issues at the lowest possible level.

b) Issues that cannot be satisfactorily resolved between the ANAC Head of Flight Standards Department and EASA Flight Standards Director on an ad hoc basis shall be added to the agenda for the next formal Joint Sectorial Committee on Maintenance (JSCM) meeting for further consideration.

c) Issues that cannot be resolved by the JSCM must be forwarded to the Joint Committee for resolution (the Joint Committee is a joint executive level group responsible for effective functioning of the Agreement).

4 Joint Sectorial Committee on Maintenance (JSCM)

4.1 The JSCM, under the leadership of the ANAC’s Head of the Department of Flight Standards and EASA’s Flight Standards Director shall meet at least annually to ensure the effective functioning and implementation of Annex B to the Agreement by reviewing the progress on implementation issues and propose changes to this MAG when required. Meeting attendees should include the officials responsible for the technical coordination of this guidance and additional officials of ANAC, EASA, and the NAAs as needed to address the meeting agenda items. At the discretion of the joint leadership, staff and representatives of other appropriate organisations may be invited to participate.

4.2 The host is responsible for the meeting minutes and action items that are centrally tracked.

4.3 Significant audit findings, reports and recommendations resulting from standardisation and Sampling Inspection System (SIS) activities will be submitted to the JSCM. During the JSCM, each party shall present its intention for the next 12-month period.

4.4 The JSCM shall report to the Joint Committee the issues resulting from differences the JSCM failed to resolve and shall ensure the implementation of any decisions reached by the Joint Committee.

4.5 The JSCM may setup a Joint Sectorial Maintenance Group (JSMG) comprised of representatives from both ANAC and EASA in charge of the review of the implementation of the Agreement and propose revision of this MAG to the JSCM.

4.6 The JSCM may sponsor subgroups to address specific technical issues and make recommendations for amendment to the Agreement or revisions to this guidance.

5 Revisions

5.1 The JSCM shall review this guidance as necessary. These revisions become effective upon approval by the JSCM and shall be implemented, as applicable, within 90 days after the change has been published, unless otherwise specified.

II Cooperation in Standardisation Activities

1 General

1.1 In order to ensure the effective functioning and implementation of Annex B to the Agreement, continued understanding and compatibility of each other’s maintenance systems should be promoted by ANAC and EASA.

1.2 To this end, ANAC and EASA shall consult and share information on standardisation activities and promote the participation in each other’s inspections and audits.

1.3 These activities may include sampling inspections at each other’s approved maintenance organisations to ensure the Competent Authority is applying the procedures set forth in this MAG.

2 Implementation of the EU-EASA Standardisation in EU Member States.

2.1 Access to Reports: The EASA Flight Standards Directorate shall, upon request of ANAC, provide reports to the ANAC to record the fact that the Standardisation Inspection Team visits are being conducted and show the status of achieved maintenance standards of the NAAs.

2.2 ANAC Involvement as Observers: ANAC Technical Agents have the right to participate as an observer in the Standardisation Inspection Team visit schedule. The annual schedule is going to be raised as required by Regulation (EU) No. 628/2013. Ad hoc inspections may also be called at short notice. The ANAC role is passive and as part of the Inspection Team the ANAC observer shall follow the appropriate working procedures.

2.3 Conduct of Inspections:

a) The ANAC contact point will be provided with the EASA Standardisation Inspection Visit schedule of visits raised annually and as amended. EASA Flight Standards Directorate publish the guidance for team member qualification and the inspection procedures applicable to a team carrying out a standardisation inspection of an NAA.

b) In order to assist EASA in planning and managing the standardisation inspection visit schedule and teams, ANAC shall notify the EASA contact in writing two months in advance indicating which visits ANAC representatives wish to attend as observers.

2.4 EASA Verification of the ANAC Special Conditions contained in Appendix B1 to Annex B:

a) EASA monitors the NAAs of the Member States to ensure compliance with the terms of the Agreement namely the ANAC Special Conditions applicable to EU Based Approved Maintenance Organizations contained in Appendix B1 to Annex B. The audit schedule may not be synchronized with the EASA standardisation inspection schedule and is established in accordance with a risk-based approach taking into account the ANAC SIS schedule in EU.

b) During EASA verification of Annex B ANAC Special Conditions of Member State NAAs the form / report contained in Appendix 5 of Section A of this MAG shall be used by EASA.

c) The number of files to be sampled at the visited NAA should be proportional and statistically representative in relation to the number of AMOs holding a RBAC 145 supplement approval in the EU Member State.

3 EASA and Sampling Inspection System in Brazil (SIS)

3.1 Introduction: The EASA Flight Standards Directorate responsible for standardisation should establish a sampling visit schedule to check that the Agreement is being implemented in Brazil in accordance with its terms.

3.2 Objectives:

a) To monitor ANAC's application of Annex B to the Agreement, ensuring that the Annex B is applied in a consistent manner such that any organisation approved by ANAC in accordance with the provisions of the Agreement meets a standard equivalent to that required of an EASA Part-145 organisation.

b) To assist ANAC and the RBAC 145 Approved Maintenance Organizations (AMO) holding an EASA Part 145 Approval in understanding their obligations under the terms of the Agreement on Aviation Safety between the European Union and Brazil.

3.3 Mode of Operation:

a) EASA SIS Teams need to visit selected ANAC Regional Offices and applicable Brazilian AMOs on a regular basis to satisfy the objectives presented in Section A Part II paragraph 3.2.

b) When the EASA SIS Team perceives compliance problems with the Agreement, this guidance or the application of maintenance standards, such problems are to be reported on the applicable EASA Visit Report to be presented to ANAC at the conclusion of the visit.

c) During the course of the visit, the SIS Team may have cause to raise findings in accordance with the following:

i Findings with regards to EASA Special Conditions contained in Appendix B1 to Annex B.

ii Findings with regards to the equivalent EASA Part 145 paragraph.

d) The EASA Flight Standards Directorate should review the EASA Visit Reports and request ANAC to provide a corrective action plan in a timely manner but not later than 90 days after the visit. Findings can be raised at both the ANAC Regional Office and / or visited AMO. The ANAC SPO - GCAC must ensure the necessary follow up actions are taken by the applicable ANAC Regional Office and / or AMO.

3.4 EASA SIS Team Composition:

a) Each SIS Team should consist of two experienced maintenance surveyors, and can be selected from EASA staff with additional staff from NAAs when there is a shortage of experienced maintenance surveyors from EASA. Each team may include a third maintenance surveyor undergoing team familiarisation.

b) The personnel assigned by ANAC Flight Standards Department - Continued Airworthiness Certification Branch (SPO – GCAC) shall accompany the SIS Team during the visit to ensure that no misunderstandings arise in respect of perceived standards and interpretation of maintenance regulations. A GCAC airworthiness inspector, who has sufficient previous experience with the particular organisation visited, should join the team for that visit in order to facilitate the on-site visit and provide background information about the organization, as required.

3.5 EASA SIS Team Visit Program:

a) EASA SIS Teams will visit ANAC Regional Offices and Brazilian AMOs holding an EASA Part 145 Approval at a frequency to ensure that standards are being achieved and therefore the frequency may vary in light of experience. EASA Flight Standards directorate should determine a visit schedule and provide it to ANAC. The final dates of a specific visit should be provided to ANAC Flight Standards Department - Continued Airworthiness Certification Branch (SPO – GCAC) at least 2 months in advance. ANAC is expected to make every effort to both receive and cooperate with the team.

3.6 The Selection of ANAC Regional Offices to be visited:

a) EASA Flight Standards directorate will determine the SIS visit schedule using objective criteria and risk analysis. The following list is not exhaustive but may illustrate the main criteria used to select a region / Regional Office to visit:

- i Regional Offices that have large concentration of ANAC approved maintenance organisations may be used as an indication of business carried out in that area and a selection of approvals used to give a sample of that Regional Office.
- ii Where EASA has received a number of reports of non-compliance in relation to organisations from a Regional Office, this could indicate a problem and need for a visit.
- iii Previous EASA sampling inspections reports that indicate a particular Regional Office may be of concern to EASA.
- iv The scope of individual approvals may be used to carry out a risk analysis and indicate where safety could be most at risk.

b) In addition, a review of occurrences reported to EASA may be used as an indicator of potential problem areas. Occurrence reports may be drawn from the following areas and used to make a selection:

- i EU Member States NAAs
- ii Operators within the EU
- iii Approved and unapproved organisations within the EU
- iv Approved organisations within Brazil

3.7 EASA SIS Procedures:

a) SIS Teams normally visit Brazil for one week. The relevant EASA Flight Standards coordinator must liaise with ANAC SPO-GCAC to organize the visit schedule. ANAC will make every effort to cooperate with the SIS team.

b) At the start and end of each visit, ANAC shall be briefed regarding the visit.

c) The SIS Team should complete an EASA Visit Report ANAC Regional Office (Section A of this MAG, Appendix 3) in respect of each Regional Office visited and an EASA Visit Report AMO (Section A of this MAG, Appendix 4) in respect of each organisation visited. ANAC SPO-GCAC representative, as applicable, should also sign the EASA Visit Report ANAC Regional Office to indicate that the report has been seen, adding any comment he/she wishes against each finding, and if necessary, disagreement with the non-compliance finding(s) and / or observations. Signature by ANAC SPO-GCAC representative only means that the findings have been seen. The EASA SIS team leader will also sign the reports.

d) The SIS Team may raise non-compliance Level 1 findings (as defined by EASA Part-145 Section B) on sampled AMO. In this case, the EASA has to request ANAC to suspend the supplement approval letter of the AMO. The approval may be partially or totally suspended.

3.8 Resolution of SIS Team Findings:

a) The EASA Flight Standards Directorate should review the EASA Visit Report ANAC Regional Office and request ANAC to take the appropriate remedial actions in a timely manner. The ANAC GCAC must take action on all the EASA Visit Report ANAC Regional Office non-compliance findings raised following the visit. EASA Flight Standards Directorate must be kept informed of the actions taken by ANAC.

b) The visited ANAC Regional Office must take action on all the EASA Visit Report AMO non-compliance findings raised following the visit. Action should be taken directly with the

affected organisation. This may involve removing the organisation from the EASA list. EASA Flight Standards Directorate must be kept informed of the actions taken by ANAC.

c) Review general observations contained in EASA Visit Report with ANAC to consider possible corrective measures to ensure standards compatible with EASA Part-145. Follow-up will be accomplished by ANAC and reported to EASA for closure.

4 Standardisation Activities within ANAC

4.1 Access to Reports: The ANAC Flight Standards Department - Continued Airworthiness Certification Branch (SPO – GCAC) shall, upon request of EASA, provide reports related to standardisation activities to EASA.

4.2 EASA Involvement as Observers:

EASA Technical Agents have the right to participate as an observer in the Standardisation activities conducted by ANAC. EASA shall notify the ANAC Flight Standards Department - Continued Airworthiness Certification Branch (SPO – GCAC) in writing two months in advance indicating which activities EASA representatives wish to attend as observers.

4.3 Conduct of Inspections:

a) The EASA contact point will be provided with the ANAC standardisation plan raised annually.

b) In order to assist ANAC in planning and managing the standardisation plan and teams, EASA shall notify ANAC contact in writing two months in advance indicating which visits EASA representatives wish to attend as observers.

4.4 ANAC Verification of the EASA Special Conditions contained in Appendix B1 to Annex B

a) ANAC monitors the Regional offices to ensure compliance with the terms of the Agreement namely the EASA Special Conditions applicable to Brazilian Based Maintenance Organisations contained in Appendix B1 to Annex B. The audit schedule may not be synchronized with the ANAC inspection schedule and is established in accordance with a risk-based approach taking into account the EASA SIS schedule in Brazil.

b) During ANAC verification of EASA Special Conditions contained in Appendix B1 to Annex B of the Regional Offices the form / report contained in Appendix 3 of Section A of this MAG shall be used by ANAC.

c) The number of files to be sampled at the visited ANAC Regional Office should be proportional and statistically representative in relation to the number of AMOs holding an EASA Part-145 Approval.

5 ANAC and Sampling Inspection System in EU (SIS)

5.1 Introduction: The ANAC Flight Standards Department - Continued Airworthiness Certification Branch (SPO – GCAC) should establish a sampling visit schedule to check that the Agreement is being implemented in the European Union in accordance with its terms.

5.2 Objectives:

- a) To monitor EASA and NAAs application of Annex B to the Agreement, ensuring that the Annex is applied in a consistent manner such that any organisation approved by NAAs in accordance with the provisions of the Agreement meets a standard equivalent to that required of a RBAC 145 organisation.
- b) To assist EASA, NAAs and Part-145 Approved Maintenance Organizations (AMO) holding RBAC 145 Approval in understanding their obligations under the terms of the Agreement on Aviation Safety between the European Union and Brazil.

5.3 Mode of Operation:

- a) ANAC SIS Teams need to visit selected NAAs and applicable Part-145 AMOs on a regular basis to satisfy the objectives presented in Section A Part II paragraph 5.2.
- b) When the ANAC SIS Team perceives compliance problems with the Agreement, this guidance or the application of maintenance standards, such problems are to be reported on the applicable ANAC Visit Report to be presented to EASA and the NAA at the conclusion of the visit.
- c) During the course of the visit the SIS Team may have cause to raise findings in accordance with the following:
 - i Findings with regards to the ANAC Special Conditions contained in Appendix B1 to Annex B.
 - ii Findings with regards to the equivalent paragraph of the RBAC 43 and 145 regulations.
- d) The ANAC HQ should review the ANAC Visit Reports and request EASA/NAA to provide a corrective action plan in a timely manner but not later than 90 days after the visit. The EASA Flight Standards Directorate must ensure the necessary follow up actions are taken by the applicable NAA and / or AMO.

5.4 ANAC SIS Team Composition:

- a) Each SIS Team should consist of two ANAC Airworthiness Civil Aviation Safety Inspectors and can be designated by the ANAC Department of Flight Standards - Continued Airworthiness Certification Branch (SPO – GCAC). Each team may include a third ANAC Airworthiness Inspector undergoing team familiarisation.
- b) The personnel assigned by the EASA Flight Standards shall accompany the ANAC SIS Team during the visit to ensure that no misunderstandings arise in respect of perceived standards and interpretation of maintenance regulations. The NAA responsible surveyor for the particular organisation visited should join the team for that visit in order to facilitate the on-site visit and provide background information about the organization visited, as required.

5.5 ANAC SIS Team Visit Program:

ANAC SIS Teams will visit NAAs and Part-145 AMOs holding a RBAC 145 Approval at a frequency to ensure that standards are being achieved and therefore the frequency may vary in light of experience. The ANAC Department of Flight Standards - Continued Airworthiness Certification Branch (SPO – GCAC) should determine a visit schedule and provide it to EASA Flight Standards. The final dates of a specific visit should be provided to EASA Flight Standards at least 2 months in advance. EASA and the applicable NAA are expected to make every effort to both receive and cooperate with the team.

5.6 The Selection of NAA's to be visited

a) The ANAC Continued Airworthiness Certification Branch (SPO-GCAC) will determine the SIS visit schedule using objective criteria and risk analysis. The following list is not exhaustive but may illustrate the main criteria used to select an EU Member State and NAA office to visit:

- i NAA's that have large concentrations of EASA approved maintenance organisations may be used as an indication of business carried out in that area and a selection of approvals used to give a sample of that NAA.
- ii Where ANAC has received a number of reports of non-compliance in relation to organisations from an NAA, this could indicate a problem and need for a visit.
- iii Previous ANAC sampling inspections reports that indicate a particular NAA may be of concern to ANAC.
- iv The scope of individual approvals may be used to carry out a risk analysis and indicate where safety could be most at risk.

b) In addition, a review of occurrences reported to ANAC may be used as an indicator of potential problem areas. Occurrence reports may be drawn from the following areas and used to make a selection:

- i ANAC Regional Offices;
- ii Operators within Brazil;
- iii Approved and unapproved organisations within Brazil;
- iv Approved organisations within EU.

5.7 ANAC SIS Procedures:

a) SIS Teams normally visit Europe for one week. The ANAC Continued Airworthiness Certification Branch Manager (SPO – GCAC) responsible for Standardisation must liaise with EASA and the respective NAA. EASA and the NAA will make every effort to cooperate with the SIS team.

b) At the start and end of each visit, EASA and the NAA shall be briefed regarding the visit.

c) The SIS Team should complete a ANAC Visit Report NAA (Section A of this MAG, Appendix 5) in respect of each NAA visited and an ANAC Visit Report AMO (Section A of this MAG, Appendix 6) in respect of each organisation visited.

d) The NAA, as applicable, should also sign the ANAC Visit Report NAA to indicate that the report has been seen, adding any comment he/she wishes against each finding, and if necessary, disagreement with the non-compliance finding(s) and / or observations. Signature by the NAA only means that the findings have been seen.

e) The SIS Team may raise Critical findings (when there are unacceptable risks to the flight safety) on sampled AMO. In this case, ANAC has to request the relevant Competent Authority to suspend the supplement approval letter of the AMO. The approval may be partially or totally suspended. The NAA must carry out the necessary follow up actions.

f) After SIS visit, the SIS Team must debrief the ANAC Department of Flight Standards - Continued Airworthiness Certification Branch (SPO – GCAC) Manager.

5.8 Resolution of SIS Team Findings:

- a) The ANAC Continued Airworthiness Certification Branch (SPO – GCAC) should review the ANAC Visit Report NAA and request EASA to take the appropriate remedial actions in a timely manner. ANAC SPO-GCAC shall be informed of the actions taken by EASA/NAA.
- b) The NAA must take action on all the ANAC Visit Report AMO non-compliance findings raised following the visit. Action should be taken directly with the affected organisation. This may involve removing the organisation from the ANAC list. ANAC SPO-GCAC must be kept informed of the actions taken by EASA and the respective NAA.
- c) The NAA should review all observations contained in ANAC Visit Reports with EASA to consider possible corrective measures to ensure standards compatible with ANAC RBAC 145. Follow up will be completed by EASA and reported to ANAC for closure.

III Definitions

Accountable Manager: The accountable manager is normally intended to mean the chief executive officer of the organization, who by virtue of position has overall [including in particular, financial] responsibility for running the organization. When the accountable manager is not the chief executive officer, he must have direct access to the chief executive officer and have a sufficiency of maintenance funding allocation. Within an ANAC Approved Maintenance Organization this individual is also referred as the Accountable Executive.

Aircraft: Any machine that can derive support in the atmosphere from the reactions of the air other than reactions of the air against the earth's surface.

Airworthiness Approval: A finding that the design or change to a design of a civil aeronautical product meets standards established by the applicable legislation in force in either Party or that a product conforms to a design that has been found to meet those standards and is in a condition for safe operation.

ANAC Continuous Airworthiness Regional Offices: The ANAC Department of Flight Standards (SPO) regional offices in Brasília, São Paulo and Rio de Janeiro responsible for certification and surveillance of maintenance organizations and air operators' maintenance, certification of airworthiness, and surveillance of airworthiness accredited persons.

ANAC Foreign 145 Group: ANAC continuing airworthiness group under the SPO-GCAC branch, which is responsible, as a main point of contact, for coordination of foreign maintenance organisation certifications and surveillance.

ANAC Headquarter – ANAC HQ: ANAC main office, located in Brasilia, where the agency's managerial decisions are made.

Approved data: Data in support of repairs or modifications approved by the competent authority, by an appropriately rated design organisation or accepted under the terms of the Agreement.

Approved Maintenance Organisation (AMO): Means a natural person, a legal person or part of legal person entitled to maintain any aircraft and / or component for which it is approved.

Civil Aeronautical Product: Any civil aircraft, aircraft engine, or aircraft propeller, or sub-assembly, appliance, part, or component installed or to be installed thereon.

Competent Authority: A government agency or entity that is designated as a Competent Authority by a Party for the purpose of this Agreement, that exercises a legal right to assess conformity of, to monitor and to control the use or sale of Civil Aeronautical Products or services within a Party's jurisdiction and that may take enforcement action to ensure that such

products or services marketed within that Party's jurisdiction comply with applicable legal requirements.

Note: In this MAG, a competent authority within EU is either EASA or an EU Member State Competent Authority which is referred as NAA, the acronym used within EU to designate the National Aviation Authorities.

Component: Any aircraft engine, aircraft propeller, part or appliance.

GCAC: The branch under the ANAC Department of Flight Standards (SPO) responsible for continued airworthiness of the operators, including certification and oversight of Maintenance Organisations.

GTOM: The branch under ANAC GCAC responsible for the certification of the Maintenance Organisations in accordance with the RBAC 145.

GTVA: The branch under ANAC GCAC responsible for the surveillance activities of air operators, general aviation and Maintenance Organisations.

Large Aircraft: An aircraft classified as an aeroplane with a maximum take-off mass of more than 5.700 Kg, or a multi-engine helicopter.

Line Station:

For EASA: A location, with scope of work limited to line maintenance services, that is identified in the relevant Approval/Manual and is subject to the oversight of a competent authority.

For ANAC: a secondary base, limited to provide line maintenance services, identified by the appropriate Operation Specifications.

In both cases, the scope of work is limited to line maintenance as defined below.

Note: Line stations located outside the territory of both Parties are acceptable, provided they are identified in the relevant manual and are subject to the oversight of a Competent Authority. Line stations located in each other's territory are not accepted under the Agreement i.e. you cannot exercise the privileges received under the Agreement in the territory of the other party.

Line maintenance: Any maintenance that is carried out before flight to ensure that the aircraft is fit for the intended flight.

Line Maintenance may include:

- Trouble shooting.
- Defect rectification.
- Component replacement with use of external test equipment if required. Component replacement may include components such as engines and propellers.
- Scheduled maintenance and/or checks including visual inspections that will detect obvious unsatisfactory conditions/discrepancies but do not require extensive in-depth inspection. It may also include internal structure, systems and power plant items which are visible through quick opening access panels/doors.
- Minor repairs and modifications which do not require extensive disassembly and can be accomplished by simple means.

- For temporary or occasional cases (AD's, SB's) the Quality Manager may accept base maintenance tasks to be performed by a line maintenance organisation provided all requirements are fulfilled as defined by the competent authority.
- Maintenance tasks falling outside these criteria are considered to be Base Maintenance.
- Aircraft maintained in accordance with 'progressive' type programmes should be individually assessed in relation to this paragraph. In principle, the decision to allow some 'progressive' checks to be carried out should be determined by the assessment that all tasks within the particular check can be carried out safely to the required standards at the designated line maintenance station.

Note: For European Union EASA approved AMO where the organisation uses facilities both inside and outside the Member State, such as additional fixed locations, line stations etc., such facilities may be included in the approval without being identified on the approval certificate subject to the maintenance organisation exposition identifying the facilities and containing procedures to control such facilities and the competent authority being satisfied that they form an integral part of the approved maintenance organisation.

Maintenance: The performance of inspection, overhaul, repair, preservation, or the replacement of parts, appliances, or components with the exception of pre-flight inspection of a Civil Aeronautical Product to assure the continued airworthiness of that product; and includes the embodiment of Modifications; but does not include the design of Repairs and Modifications.

Modification: A change affecting the construction, configuration, performance, environmental characteristics, or operating limitations of the affected civil aeronautical product.

Monitoring: Periodic surveillance by a Competent Authority to determine continuing compliance with the appropriate applicable standards.

NAA: See Competent Authority.

Parties: Collectively reference to European Union and Brazil.

Party: For the purpose of the Agreement means either European Union or Brazil

Procedure for Maintenance: Annex B of the Agreement on Civil Aviation Safety between the European Community and Brazil.

Special Condition: Requirements in either Regulamento Brasileiro de Aviação Civil - RBAC 43 and 145 or in Commission Regulation (EC) No 1321/2014 Annex II (hereinafter referred to as EASA Part-145) that have been found, based on a comparison of the regulatory maintenance systems, not to be common to both systems and which are significant enough that they must be addressed.

Technical Agent: For Brazil, Agência Nacional de Aviação Civil and for European Union, the European Union Aviation Safety Agency.

TIP: Technical Implementation Procedures for Annex A of the Agreement.

IV Special Conditions

1 General

1.1 Pursuant to this Agreement, the recognition by one Party of a maintenance organisation under the jurisdiction of the other Party shall be based upon the

maintenance organisation incorporating into its procedures manual (MOE or MOM, according to the case), a supplement that addresses the additional requirements stated herein.

1.2 The manual shall contain a statement of commitment signed by the current Accountable Manager (Executive) confirming that the organisation will comply with the manual and the supplement, and shall, at a minimum, include the information specified in the appropriate annex to this document.

1.3 The supplement shall be produced in English language and shall be approved by the authority having primary jurisdiction over the maintenance organization, on behalf of the other party.

1.4 In order to be approved in accordance with EASA Part 145 or with RBAC 145 pursuant the terms of Annex B to the Agreement the Maintenance Organisation located in Brazil and the AMOs in EU shall comply, respectively, with EASA Special Conditions applicable to Brazilian based maintenance organisations and ANAC Special Conditions applicable to EU based approved maintenance organisations (AMOs) as per Appendix B1 to Annex B.

2 EASA Special Conditions Applicable to Brazilian based Maintenance Organisations

2.1 To be approved in accordance with EASA Part 145, pursuant to the terms of the Annex B from the Agreement, the maintenance organisation shall comply with all of the following Special Conditions:

- a) The maintenance organisation shall submit an application in a form and a manner acceptable to EASA (Appendix 4 of Section B). The application for both initial and continuation of the EASA approval shall include a statement demonstrating that the EASA approval is necessary for maintaining or altering aeronautical products registered in an EU Member State or parts fitted thereon.
- b) The maintenance organisation shall provide a supplement to its Maintenance Organisation Manual (MOM) that is verified and approved by the ANAC on behalf of EASA. All revisions to the supplement must be approved by the ANAC. The supplement shall include the following:
 - (i) A statement by the accountable manager of the maintenance organisation, as defined in the current version of EASA Part 145, which commits the maintenance organisation to compliance with the Annex B and the Special Conditions as listed.
 - (ii) Detailed procedures for the operation of an independent quality monitoring system including oversight of all multiple facilities within the territory of the Federative Republic of Brazil and all applicable line stations.
 - (iii) Procedures for the release or approval for return to service that meet the requirements of EASA Part 145 for aircraft and the use of the ANAC Form F-100-01 (also referred as ANAC Form SEGVOO 003) for aircraft components, and any other information required by the owner or operator as appropriate.
 - (iv) Procedures to ensure that all parts used to repair EU registered aircraft or components to be fitted thereto were manufactured or maintained by organizations acceptable to EASA.

- (v) Procedures to ensure that repairs and modifications as defined by EASA requirements are accomplished in accordance with data approved by EASA.
- (vi) A procedure for the maintenance organisation to ensure that the ANAC approved initial and recurrent training programme and any revision thereto include human factors training.
- (vii) Procedures for reporting non-airworthy conditions as required by EASA Part 145 on civil aeronautical products to the EASA, aircraft design organisation, and the customer or operator.
- (viii) Procedures to ensure completeness of, and compliance with, the customer or operator work order or contract including notified EASA airworthiness directives and other notified mandatory instructions.
- (ix) Procedures in place to ensure that contractors meet the terms of these implementation procedures; that is, using an EASA approved Part 145 organisation or, if using an organisation which does not hold an EASA Part 145 approval, the maintenance organisation returning the product to service is responsible for ensuring its airworthiness.
- (x) Procedures to permit work away from the fixed location on a recurring basis, when applicable
- (xi) Procedures to ensure appropriate covered hangars are used when performing base maintenance of EU registered aircraft.
- (xii) Procedures to confirm that the AMO supervisors and employees responsible for final inspection and return to service are able to read, write, and understand English.

2.2 To continue to be approved in accordance with EASA Part 145, pursuant to the terms of the Annex B, the maintenance organisation shall comply with the following, subject to ANAC verification:

- a) Allow EASA, or the ANAC on behalf of EASA, to inspect it for continued compliance with the requirements of the Brazilian Regulation RBAC 145 and these Special Conditions.
- b) Accept that investigation and enforcement action may be taken by EASA in accordance with any relevant EU regulations and EASA procedures.
- c) Cooperate with any EASA investigation or enforcement action.
- d) Continue to comply with Brazilian Regulation RBAC 145 and these Special Conditions.

3 ANAC Special Conditions Applicable to EU based Approved Maintenance Organisations

3.1 To be approved in accordance with Brazilian Regulation RBAC 145, pursuant to the terms of the Annex B from the Agreement, the AMO shall comply with all of the following Special Conditions:

- a) The AMO shall submit an application in a form and a manner acceptable to the ANAC (Appendix 3 of Section C). The application for both initial and continuation of ANAC approval shall include a statement demonstrating that the ANAC approval is necessary for

maintaining or altering Brazilian registered aeronautical products or foreign registered aeronautical products operated under the provisions of Brazilian Regulations RBAC.

b) The AMO must provide a supplement in English to its MOE that is approved by the Competent Authority and maintained at the AMO. Once approved by the Competent Authority, the supplement shall be deemed accepted by the ANAC. All revisions to the supplement must be approved by the Competent Authority. The ANAC supplement to the MOE shall include the following:

(i) A signed and dated statement by the accountable manager that obligates the organisation to comply with the Annex.

(ii) A summary of its quality system which shall also cover the ANAC special conditions.

(iii) Procedures for approval for release or return to service that satisfy the requirements of Brazilian Regulation RBAC 43 for aircraft and use of EASA Form 1 for components. This includes the information required by Brazilian regulations RBAC 43.9 and 43.11 and all information required to be made or kept by the owner or operator in English as appropriate.

(iv) Procedures for reporting to the ANAC failures, malfunctions, or defects, and Suspected Unapproved Parts (SUP) discovered, or intended to be installed, on Brazilian aeronautical products.

(v) Procedures to qualify and monitor additional fixed locations in the EU Member States and all applicable line stations inside and outside the EU Member States.

(vi) Procedures in place to verify that all contracted/subcontracted activities include provisions for a non ANAC certificated source to return the Article to the AMO for final inspection/testing and return to service.

(vii) Procedures to ensure that major repairs and major alterations/modifications (as defined in Brazilian Regulations RBAC) are accomplished in accordance with data approved by the ANAC.

(viii) Procedures to ensure compliance with air carrier's Continuous Airworthiness Maintenance Programme (CAMP), including the separation of maintenance from inspection on those items identified by the air carrier/customer as Required Inspection Items (RII).

(ix) Procedures to ensure compliance with the manufacturer's maintenance manuals or instructions for continued airworthiness (ICA) and handling of deviations.

(x) Procedures to ensure that all current and applicable airworthiness directives (AD) published by the ANAC are available to maintenance personnel at the time the work is being performed.

(xi) Procedures for the AMO to guarantee its capability to clearly comprehend information presented in the Portuguese language.

(xii) Procedures to permit work away from fixed location on a recurring basis, when applicable.

(xiii) Procedures to maintain, at least for 5 (five) years, each Work Order with all attached supplementary forms and part certifications.

(xiv) In the case when an AMO is authorized to perform Annual Maintenance Inspection (IAM) or Airworthiness Conformity Report (RCA), procedures to certify IAM or RCA in a form and manner established by ANAC.

Note: Notwithstanding the Special Condition listed in Annex B, as per the Brazilian Regulation RBAC n° 91, which replaced the former RBHA 91, Annual Maintenance Inspection – IAM was replaced by the performance of evaluations for the issuance of the Airworthiness Verification Certificate – CVA. In addition, the Airworthiness Conformity Report (RCA) is no longer used, once the Certificate of Airworthiness for Brazilian registered aircraft does not have an expiration date since the issuance of the RBAC n° 91

3.2 To continue to be approved in accordance with Brazilian Regulations RBAC 43 and 145, pursuant to the terms of the Annex B, the AMO shall comply with the following, subject to verification by the Competent Authority:

- a) Allow ANAC, or the Competent Authority on behalf of the ANAC, to inspect it for continued compliance with the requirements of EASA Part 145 and these Special Conditions;
- b) Accept that investigations and enforcement may be taken by ANAC in accordance with ANAC rules and directives;
- c) Cooperate with any investigation or enforcement action;
- d) Continue to comply with EASA Part 145 and these Special Conditions.

V Appendices

Appendix 1: Acronyms

AD	Airworthiness Directives
AN	Army-Navy Aeronautical Standard
ANAC	Agência Nacional de Aviação Civil
ANSI	American National Standards Institute
AMO	Approved Maintenance Organisation
AMC	Acceptable Means of Compliance
ARC	Authorized Release Certificate
CAA	Civil Aviation Authorities
CAMP	Continuous Airworthiness Maintenance Programme
CVA	Airworthiness Verification Certificate
DIAM	Declaração de Inspeção Anual de Manutenção (Não-Aeronavegável)
DOA	Design Organization Approval
EASA	European Union Aviation Safety Agency
EU	European Union
GCAC	Continuing Airworthiness Certification Branch
GTOM	Maintenance Organizations Certification Technical Branch
GTVA	Continuing Airworthiness Surveillance Technical Branch
HQ	Head Quarter
IAM	Annual Maintenance Inspection
ICA	Instructions for Continued Airworthiness
JSCM	Joint Sectorial Committee on Maintenance
JSMG	Joint Sectorial Maintenance Group
MAG	Maintenance Annex Guidance
MO	Maintenance Organisation
MOE	Maintenance Organisation Exposition
MOM	Maintenance Organisation Manual
NAA	National Aviation Authorities
NAS	National Aerospace Standards
OEM	Original Equipment Manufacturer
PC	Production Certificate
QAS	Quality Assurance System
QS	Quality System
RBAC	Brazilian Civil Aviation Regulation
RBHA	Regulamento Brasileiro de Homologação Aeronáutica
RCA	Airworthiness Conformity Report
RII	Required Inspection Items
SAE	Society of Automotive Engineers
SPO	ANAC Department of Flight Standards

SIS	Sampling Inspection System
STC	Supplemental Type Certificate
SUP	Suspected Unapproved Parts
TC	Type Certificate
TCCA	Transport Canada Civil Aviation
TIP	Technical Implementation Procedures

Appendix 2: Contacts

EASA and ANAC contacts

The designated offices for the technical implementation of this MAG are:

For ANAC:

ANAC Foreign 145 group.
Continuing Airworthiness Certification Branch - GCAC
Department of Flight Standards – SPO
SCS Quadra 09 - Lote C - Edifício Parque Cidade Corporate - Torre A, 3º andar
Brasília-DF-Brazil
CEP: 70.308-200

e-mails: foreign145@anac.gov.br
gcac@anac.gov.br
gtno.spo@anac.gov.br

For EASA:

Flight Standards
Flight Standards Director's Office
D-50452 Köln
Postfach 10 12 53
Germany

e-mail: tca@easa.europa.eu

Technical contacts of Aviation Authorities

EASA:

www.easa.europa.eu

E-mail: foreign145@easa.europa.eu

ANAC:

www.anac.gov.br

E-mail: gtno.spo@anac.gov.br
foreign145@anac.gov.br
gcac@anac.gov.br

Appendix 3: Visit Report ANAC Regional Office (SIS Form 10 BRA)

VISIT REPORT ANAC Regional Office		
ANAC Office IDENTIFIER:	REGION:	VISIT DATE:
Maintenance Annex Guidance (MAG) The Agreed upon procedures the ANAC, EASA, and NAA must follow to comply with the Agreement.		
Compliance Check List-General Issues		
(N/R) = applicable but not reviewed; (N/A) not applicable; (<input checked="" type="checkbox"/> <input type="checkbox"/>) = In compliance; (xy) = if not in compliance, put consecutive numbering in the box and make finding or comment in relevant section .		
Review ANAC Regional Office AMO files to verify:		
1.	Records of findings and corrective action meet ANAC requirements.	
2.	Records are retained for a 3 years period.	
3.	Records show corrective actions have been made in accordance with agreed timeframes.	
4.	Proper enforcement has been taken in accordance with ANAC requirements.	
Review ANAC Inspector Training records: (review several Inspectors records)		
5.	Have the inspectors completed the mandatory ANAC training program?	
6.	Has the ANAC made the MAG guidance material available to the inspectors?	
7.	Interview inspectors to determine knowledge and experience in using the current guidance material.	
Frequency of ANAC Audits: (Review ANAC Audit schedule)		
8.	Does the schedule ensure each location has received ANAC surveillance within the two-year time frame specified in ANAC guidance?	
9.	Does the schedule accurately reflect the ANAC inspector's workload?	
10	Is the schedule followed?	
Compliance Checklist with MAG Section B—Initial		

11.	Does the ANAC office receive and review an Initial application for completeness and correctness and retain this record on file?	
12.	Does ANAC verify that the initial application includes a statement demonstrating that the EASA certificate and/or rating is necessary for maintaining or altering aeronautical products registered or designed in an EU Member State or parts fitted thereon?	
13.	Does the ANAC office provide an applicant with the guidance material and EASA form 18 (Section B of this MAG, Appendix 4).	
EASA Special Conditions		
14.	Does the ANAC office review the Supplement i.a.w. MAG Section B Appendix 1 and does the supplement provide, as minimum, procedures that ensure compliance with the EASA Special Conditions applicable to Brazilian based Maintenance Organisations stated on Appendix B1 to Annex B paragraph 1.1 (b)?	
15.	Has the ANAC regional office carried out surveillance on the AMO and any line stations for compliance with RBAC 145 and 43 and the Supplement conditions within the time specified in MAG? Is this surveillance recorded and findings managed in accordance with the applicable oversight program?	
16.	Has the ANAC regional office forwarded the EASA Form 18 (Section B of the MAG, Appendix 4) to ANAC Foreign 145 Group as required?	
17.	Has the ANAC regional office issued a letter to the AMO stating that the supplement is approved? This letter shall also specify the EASA approval number and the scope of work that may be performed.	
18.	Has the ANAC regional office added the fact that the Maintenance Organisation is EASA-approved and added the additional surveillance requirements to its oversight surveillance system and is the Maintenance Organisation profile correct (web list)?	
Compliance Checklist with MAG Section B—Continuation		
19.	Does the ANAC regional office receive and review a continuation application for completeness and correctness and retain this record on file?	
20.	Does ANAC verifies that the continuation application includes a statement demonstrating that the EASA certificate and/or rating is necessary for maintaining or altering aeronautical products registered or designed in an EU Member State or parts fitted thereon?	
21.	Has the ANAC satisfied itself that the supplement is still in compliance?	
22.	Has the ANAC carried out the oversight surveillance requirements including any line stations during the previous 2-year period and was the Maintenance Organisation in compliance with RBAC 145	

	and the EASA Special Conditions? Is this surveillance recorded and any findings tracked and closed?	
23.	Has the ANAC forwarded the EASA Form 18 (Section B of this MAG, Appendix 3) as required?	
24.	Did the ANAC have reason to advise the EASA of any serious non-compliance?	
25.	Does the ANAC have the most recent continuation documentation on file?	
26.	Has the ANAC added the fact that the Maintenance Organisation has continued its EASA approval to the file and retained the additional surveillance requirements of their oversight surveillance system, and does the AMO profile show the correct continuation date?	
Compliance Checklist with MAG Section B—Amendment to Approved Document(s).		
27.	Where the facility accountable manager or company name has changed is this reflected in the supplement?	
28.	Has the ANAC carried out any audit required by the amendment? Is this audit recorded and any findings tracked and closed?	
29.	Has the ANAC the most recent documentation i.e. Supplement on file?	
30.	Has the ANAC added the fact that the Maintenance Organisation has amended its EASA approval to the file?	
31.	Has the ANAC carried out enforcement procedures, and has the ANAC advised EASA of any enforcement that may impact the EASA approval?	
Approved Maintenance Organisations Visited (only if applicable)		
(include a completed EASA visit report AMO for each organisation)		
	Name	EASA /ANAC approval number
1.		
2.		
3.		
4.		

Note: The number of organisations visited will be determined by the applicable SIS Team.

Findings Raised Against the ANAC office (non-compliance with MAG Section B)	Reference
1.	
2.	
3.	
4.	
5.	
Comments	

Signatures	Date of Signatures:
SIS TEAM	ANAC Representative
Name:	Name:
Signature:	Signature:
Name:	
Signature:	
Note: Signature by ANAC representatives only means they have read the report. It does not constitute agreement, with findings and comments raised in this report	

Appendix 4: EASA Visit Report AMO (SIS Form 8 BRA)

EASA Visit Report AMO (APPROVED MAINTENANCE ORGANISATION)	
General Information	
NAME OF ORGANISATION: DETAILS AMO/ MAINTENANCE ORGANISATION NO.: EASA: ANAC:	VISIT DATE:
STATUS AND REFERENCE OF MOM and Supplement:	
SENIOR PERSON(S) SEEN (NAMES & POSITIONS): ANAC inspector:	
SIZE OF ORGANISATION AND DESCRIPTION OF ACTIVITIES:	
DEPARTMENTS/SYSTEMS/ACTIVITIES SEEN:	
Compliance with EASA Special Conditions and MAG	
(N/R) = applicable but not reviewed; (N/A) not applicable; (☑☐) = In compliance; (x) = if not in compliance, put consecutive numbering in the box and make finding in relevant section.	

1.	Maintenance organisation holds valid RBAC 145 approval.	
2.	The EASA Part 145 certifications do not exceed the scope and rating of the RBAC 145 approval.	
3.	EASA and ANAC are allowed access to Maintenance organisation to inspect for continued compliance with RBAC 145 and EASA Special Conditions.	
4.	The Maintenance organisation cooperates with any regulatory investigation.	
5.	The Maintenance organisation accepts that investigation and certificate action may be taken.	
The supplement to the Maintenance organisation Manual needs to be in English and include the following elements: (Verify that the Maintenance organisation is applying the procedures correctly.)		
6.	Statement of Accountable Manager.	
7.	Detailed procedures for the operation of an independent quality monitoring system including oversight of all multiple facilities and line stations.	
8.	Procedures for the release or approval for return to service that meet the requirements of EASA Part 145.A.50 for aircraft and the use of the ANAC Form F-100-01 (also referred as ANAC Form SEGVOO 003) for aircraft components, and any other information required by the owner or operator as appropriate.	
9.	Procedures to ensure that all parts used to repair EU registered aircraft or components to be fitted thereto were manufactured or maintained by organizations acceptable to EASA.	
10.	Procedures to ensure that repairs and modifications as defined by EASA requirements are accomplished in accordance with data approved by EASA.	
11.	A procedure for the maintenance organisation to ensure that the ANAC approved initial and recurrent training programme and any revision thereto include human factors training.	
12.	Procedures for reporting non-airworthy conditions as required by EASA Part 145 on civil aeronautical products to the EASA, aircraft design organisation and the customer or operator.	
13.	Procedures to ensure completeness of, and compliance with, the customer or operator work order or contract including notified EASA airworthiness directives and other notified mandatory instructions.	
14.	Procedures in place to ensure that contractors meet the terms of these implementation procedures; that is, using an EASA approved Part 145 organisation or, if using an organisation which does not hold an EASA Part 145 approval, the maintenance organisation returning the product to service is responsible for ensuring its airworthiness.	
15.	Procedures to permit work away from the fixed location on a recurring basis, when applicable.	
16.	Procedures to ensure appropriate covered hangars are used when performing base maintenance of EU registered aircraft.	
17.	Procedures to confirm that the AMO supervisors and employees responsible for final inspection and return to service are able to read, write, and understand English.	

Findings Debriefed to the Organisation; Findings Raised Formally by EASA	
Non-compliance with EASA special conditions/MAG	Reference to MAG
Observations to be raised with the equivalent Part 145 paragraph	Reference to Part 145
Signatures	Date of Signatures:
SIS TEAM (EASA/NAA)	ANAC Representative
Name:	Name:
Signature:	Signature:
Name:	
Signature:	
<p>Note: Signature by ANAC representatives only means they have read the report. It does not constitute agreement with findings and comments raised in this report</p>	

Appendix 5: Visit Report Member State NAA (SIS Form 10 EU)

VISIT REPORT Member State NAA		
NAA IDENTIFIER:	Office Visited:	VISIT DATE:
Compliance Check List General Issues*		
*(N/R) = applicable but not reviewed; (N/A) not applicable; (☑☐) = In compliance; (xy) = if not in compliance, put consecutive numbering in the box and make finding or comment in relevant section.		
Review NAA Office Maintenance Organizations files to verify:		
1. Records of findings and corrective action meet EASA requirements.		
2. Records are retained for a 3 years period.		
3. Records show corrective actions have been made in accordance with agreed timeframes.		
4. Proper enforcement has been taken in accordance with EASA requirements.		
5. Has the NAA the most recent documentation i.e. Brazilian Supplement on file?		
Review NAA Inspector Training records: (review several Inspectors records)		
6. Have the inspectors completed the mandatory training program?		
7. Has the NAA made the MAG guidance material available to the inspectors?		
8. Interview inspectors to determine knowledge and experience in using the current guidance material.		
Frequency of NAA Audits: (Review NAA Audit schedule)		
9. Does the schedule ensure each fixed location has an NAA audit within the two-year time frame and sampling of line stations?		
10. Does the schedule accurately reflect the NAA inspector's workload?		
11. Is the schedule followed?		
Compliance Checklist with MAG Section C—Initial		

12.	Does the NAA office receive and review an Initial application for completeness and correctness and retain this record on file?	
13.	Does NAA verify that the initial application includes a statement demonstrating that the ANAC certificate and/or rating is necessary for maintaining or altering Brazilian registered aeronautical products or foreign registered aeronautical products operated under the provisions of the RBAC?	
14.	Does the NAA office checked if the applicant is using the current guidance material and ANAC form F-900-81 (http://www2.anac.gov.br/certificacao/Form/Form.asp)?	
ANAC Special Conditions		
15.	Does the NAA office review the Supplement i.a.w. MAG Section C Appendix 1 and does the supplement provide, as minimum, procedures that ensure compliance with the ANAC Special Conditions applicable to EU based maintenance organisations stated on Appendix B1 to Annex B paragraph 2.1 (b) of the Agreement?	
16.	Has the NAA office carried out an audit on the AMO and any line stations for compliance with EASA Part 145 and the Special conditions within the time frame specified in MAG? Is this audit recorded and any findings tracked and closed?	
17.	Has the NAA office forwarded the ANAC F-900-81. (http://www2.anac.gov.br/certificacao/Form/Form.asp) to ANAC Foreign 145 Group as required?	
18.	Has the NAA office issued a letter to the AMO stating that the supplement is approved? This letter shall also specify the ANAC approval number, the scope of work that may be performed and the expire date?	
19.	Has the NAA office added the fact that the AMO is ANAC approved and added the additional audit requirements to its oversight audits system?	
Compliance Checklist with MAG Section C—Continuation		
20.	Does the NAA office receive and review a continuation application for completeness and correctness and retain this record on file?	
21.	Does the NAA verify that the continuation application includes a statement demonstrating that the ANAC certificate and/or rating is necessary for maintaining or altering aeronautical products registered in Brazil or parts fitted thereon?	
22.	Has the NAA satisfied itself that the supplement is still in compliance?	
23.	Has the NAA carried out oversight audit, including line stations, during the previous 2-year period and was the AMO in compliance with EASA Part 145 and the ANAC special conditions? Is this audit recorded and any findings tracked and closed?	
24.	Has the NAA forwarded the ANAC Form F900-81 (http://www2.anac.gov.br/certificacao/Form/Form.asp) as required?	
25.	Did the NAA have reason to advise the ANAC of any serious non-compliance?	
26.	Does the NAA have the most recent continuation documentation on file?	

27.	Has the NAA added the fact that the AMO has continued its ANAC approval to the file and retained the additional audit requirements of their oversight audits system, and does the AMO profile show the correct continuation date?	
Compliance Checklist with MAG Section C — Amendment to Approved Document(s).		
28.	Where the facility accountable manager or company name has changed is this reflected in the supplement?	
29.	Has the NAA carried out any audit required by the amendment? Is this audit recorded and any findings tracked and closed?	
30.	If required a new Supplement approval letter was issued by the NAA to reflect the amendment?	
31.	Has the NAA carried out enforcement procedures, and has the NAA advised ANAC of any enforcement that may impact the ANAC approval?	
Approved Maintenance Organisations Visited by ANAC (only if applicable) (include a completed ANAC visit report AMO for each organisation) or NAA files reviewed by EASA during standardisation visit Verification of ANAC Special Conditions		
	Name	EASA /ANAC approval number
1.		
2.		

The number of organisations visited will be determined by the applicable SIS Team.

Findings Raised Against the NAA office (non-compliance with MAG Section C)	Reference
1.	
2.	
3.	
Comments	
Signatures	Date of Signatures:

SIS TEAM Lead	EASA Representative (if applicable)
Name:	Name:
Signature:	Signature:
	NAA Representative
	Name:
	Signature:
<p>Note: Signature by EASA and NAA representatives only means they have read the report. It does not constitute agreement, with findings and comments raised in this report</p>	

Appendix 6: ANAC Visit Report AMO (SIS Form 8 EU)

ANAC Visit Report AMO (EASA PART-145 APPROVED MAINTENANCE ORGANIZATION)	
General Information	
NAME OF ORGANIZATION: DETAILS AMO/MAINTENANCE ORGANISATION NO.: EASA: ANAC:	VISIT DATE:
STATUS AND REFERENCE OF MAINTENANCE ORGANISATION EXPOSITION/SUPPLEMENT:	
SENIOR PERSON(S) SEEN (NAMES & POSITIONS): EASA Representative: NAA HQ Representative:	
SIZE OF ORGANIZATION AND DESCRIPTION OF ACTIVITIES:	
DEPARTMENTS/SYSTEMS/ACTIVITIES SEEN:	
Compliance with ANAC Special Conditions and MAG	
(N/R) = applicable but not reviewed; (N/A) not applicable; (☑☐) = In compliance; (x) = if not in compliance, put consecutive numbering in the box and make finding in relevant section.	
1. AMO Holds valid EASA Part 145 approval.	

2.	The RBAC 145 scope of approval does not exceed the scope and rating of the EASA Part 145 approval.	
3.	EASA and ANAC are allowed access to AMO to inspect for continued compliance with EASA Part-145 and ANAC Special Conditions?	
4.	The AMO cooperates with any regulatory investigation.	
5.	AMO accepts that investigation and certificate action may be taken.	
The supplement to the AMO Manual needs to include the following elements: (Verify that the AMO is applying the procedures correctly.)		
6.	Statement of Accountable Manager.	
7.	A summary of its quality system which shall also cover the ANAC special conditions.	
8.	Procedures for approval for release or return to service that satisfy the requirements of RBAC 43 for aircraft and use of EASA Form 1 for components. This includes the information required by RBAC 43.9 and 43.11 and all information required to be made or kept by the owner or operator in English as appropriate.	
9.	Procedures for reporting to the ANAC failures, malfunctions, or defects, and Suspected Unapproved Parts (SUP) discovered, or intended to be installed, on Brazilian aeronautical products.	
10.	Procedures to qualify and monitor additional fixed locations within the EU Member States list and all applicable line stations inside and outside the EU Member States.	
11.	Procedures in place to verify that all contracted/sub-contracted activities include provisions for a non-ANAC certificated source to return the Article to the AMO for final inspection/testing and return to service.	
12.	Procedures to ensure that major repairs and major alterations/modifications (as defined in the RBAC) are accomplished in accordance with data approved by the ANAC.	
13.	Procedures to ensure compliance with air carrier's Continuous Airworthiness Maintenance Programme (CAMP), including the separation of maintenance from inspection on those items identified by the air carrier/customer as Required Inspection Items (RII).	
14.	Procedures to ensure compliance with the manufacturer's maintenance manuals or instructions for continued airworthiness (ICA) and handling of deviations.	
15.	Procedures to ensure that all current and applicable airworthiness directives (ADs) published by the ANAC are available to maintenance personnel at the time the work is being performed.	
16.	Procedures for the AMO to guarantee its capability to clearly comprehend information presented in the Portuguese language.	
17.	Procedures to permit work away from fixed location on a recurring basis, when applicable.	
18.	Procedures to maintain, at least for 5 (five) years, each Work Order with all attached supplementary forms and part certifications.	
19.	If applicable, procedures to certify Airworthiness Verification (former Annual Maintenance Inspection -IAM) in a form and manner established by ANAC, when an AMO is authorized to perform and issue the CVA.	

Findings Debriefed to the Organization; Findings Raised Formally by ANAC	
Non-compliance with ANAC special conditions/MAG	Reference to MAG
Observations to be raised with the equivalent RBAC 145 paragraph	Reference to RBAC
Signatures	Date of Signatures:
ANAC SIS TEAM Leader	EASA Representative
Name:	Name:
Signature:	Signature:
	NAA Representative
	Name:
	Signature:
<p>Note: Signature by EASA and NAA representatives only means they have read the report. It does not constitute agreement with findings and comments raised in this report</p>	

Section B: Approval Process for Brazilian Based Approved Maintenance Organisations

Introduction

This Guidance details how ANAC will implement the Bilateral Agreement and Annex B between the European Union and Brazil for RBAC 145 Maintenance Organizations located in Brazil.

I Initial Approval Process

1 ANAC Actions

Upon receipt of a request for supplement approval in accordance with this Agreement, ANAC shall ensure that the applicant has access to the most current revision of the MAG and the EASA Form 18 (see Appendix 4).

Note: EASA FORM 18 is available to download at EASA website (<https://www.easa.europa.eu/document-library/application-forms>).

2 Applicant Actions

2.1 To apply for an approval under the provisions of the Agreement Annex B, an applicant AMO must:

- a) Be located in Brazil;
- b) Hold a valid ANAC RBAC 145 certificate;
- c) Demonstrate that the EASA approval and/or rating is necessary for maintaining or altering aeronautical products registered in an EU Member State or parts fitted thereon.

Note: The evidence for the demonstration of need may be in the form of a Letter of Intent (LOI), work order, or a contract with details of the relevant customer. A relevant customer may be a European based Maintenance Organisation or a European operator, distributor, or lessor.

2.2 The applicant shall:

- a) Complete the EASA Form 18 (Section B of this MAG, see Appendix 4); and
- b) Establish an EASA Supplement to its Maintenance Organisation Manual in accordance with the supplement guidance material (see Appendix 1).

2.3 The EASA Form 18, the proposed EASA Supplement and the demonstration of need shall be sent to the ANAC Flight Standards Department - Continued Airworthiness Certification Branch (SPO–GCAC) at least 90 days prior to the date initial approval.

Note: The above documents shall not be sent to EASA by the applicant.

3 ANAC/EASA actions

3.1 The ANAC SPO-GCAC-GTOM shall send the EASA Form 18 to the ANAC Foreign 145 Group.

3.2 ANAC Foreign 145 Group shall forward a copy of the EASA Form 18 to EASA. EASA shall invoice the organisation based on the EASA Fees and Charges Regulation, as amended. The current EASA Fees and Charges Regulation can be found at the EASA website at: <https://www.easa.europa.eu>

3.3 Once EASA has received the applicant's payment, it shall notify ANAC Foreign 145 Group that the process can continue and identify (on the application Form 18) the EASA approval number to be used in the process.

3.4 ANAC Foreign 145 Group shall forward the information to ANAC SPO-GCAC-GTOM review the EASA Supplement for compliance with Appendix 1.

3.5 Where the supplement is found satisfactory, ANAC SPO-GCAC-GTOM shall issue a letter attesting that the EASA supplement is approved. The letter should include the following information:

- a) The EASA approval number to the AMO.
- b) The expiry date of the approval calculated as the Supplement approval date plus 24 months.
- c) Explicitly specify that the scope of ratings and limitations shall not exceed that which is specified in the organizations RBAC 145 certificate and operation specification.

3.6 The ANAC SPO-GCAC-GTOM shall inform ANAC Foreign 145 about the EASA supplement approval.

3.7 Once approved, the EASA supplement and the privileges associated with it shall remain in force for 24 months unless surrendered, suspended or cancelled by ANAC or EASA.

3.8 ANAC will ensure that activities conducted in accordance with the supplement are part of their oversight of the organization.

3.9 ANAC Foreign 145 Group shall forward a copy of the supplement approval letter to EASA (via email to foreign145@easa.europa.eu).

3.10 EASA will publish the list of Approved Maintenance Organizations located in Brazil on its website.

II Continuation Process

1 ANAC Action

1.1 ANAC ensures every 24 months that the conditions for approval continue to be met. The regular ANAC oversight should systematically include EASA special conditions verification at principal place of business, additional locations and line stations of the organizations. Where the conditions are not met, ANAC shall take appropriate action and notify EASA.

2 Applicant Actions

2.1 The applicant shall submit the following to ANAC SPO-GCAC-GTOM:

- a) A Completed EASA Form 18 indicating continuation and/or change in Block 5 as required;
- b) A current copy of their EASA Supplement (only if the continuation is submitted together with a change);
- c) Demonstrate that the EASA approval and/or rating is necessary for maintaining or altering aeronautical products registered in an EU Member State or parts fitted thereon.

Note: The evidence for the demonstration of need for the continuation process may be in the form of a completed work order (dual release SEGV0003) or release of a European registered aircraft, a Letter of Intent (LOI), work order, or a contract with details of the relevant customer. A relevant customer may be a European based Maintenance Organisation or a European operator, distributor, or lessor.

3 ANAC/EASA Actions

3.1 ANAC SPO-GCAC-GTOM will review the submitted Form 18 for completeness and legibility.

3.2 The ANAC SPO-GCAC-GTOM will review the supplement for compliance to Appendix 1 (if submitted).

3.3 The ANAC SPO-GCAC-GTOM will issue a new supplement approval letter with the new expire date, calculated adding 24 months from the previous expire date. Additionally, if submitted a supplement revision, SPO-GCAC-GTOM will update the revision number in the approval letter, when the document is found acceptable.

3.4 The ANAC SPO-GCAC-GTOM will forward the EASA Form 18 and Supplement approval letter to ANAC Foreign 145 Group.

3.5 The ANAC Foreign 145 Group will forward the completed Form 18 and supplement approval letter to EASA.

4 EASA Actions

4.1 EASA shall invoice the organisation based on the EASA Fees and Charges Regulation, as amended. The current EASA Fees and Charges Regulation can be found at the EASA website at: www.easa.europa.eu. In accordance with EASA Fees and Charges Regulation the applicable fee will be invoiced on an annual basis.

4.2 EASA shall notify ANAC Foreign 145 Group if the applicant has failed to make the fee payment within 90 days from invoice date.

4.3 If the applicant fails to pay the applicable continuation fee EASA shall ask ANAC Foreign 145 Group to revoke the supplement approval letter.

4.4 Where EASA has reason to recommend to ANAC not to continue the approval, EASA should immediately inform ANAC Foreign 145 Group who will take appropriate action.

4.5 Late Applications: The applicant is expected to apply 60 days prior to their continuation due date. ANAC will accept late applications up to 30 days beyond the due date. If the applicant fails to apply for continuation within the above specified time frame, their approval cannot be continued, it shall be rendered invalid and an initial application must be initiated by the applicant.

Note: After the expiry date of the supplement approval letter the organisation can no longer exercise the privileges of their EASA approval, i.e. not release components with a F-100-01 (also referred as ANAC Form SEGVOO003) dual or release aircraft registered in the EU.

5 Surrender of Approval

5.1 Where a company surrenders its approval, ANAC will notify EASA to remove the company from the list of approved companies on its website.

III Amendment process

1 Applicant Actions

1.1 The following changes to an organisation require the submission of an EASA Form 18 and associated amended supplement to ANAC SPO-GCAC-GTOM:

- a) Change of Address;

- b) Change of Accountable Manager;
- c) Change of Organisation Name and/or Approval Number.

2 ANAC Actions

2.1 ANAC SPO-GCAC-GTOM will review the submitted Form 18 for completeness and legibility.

2.2 The ANAC SPO-GCAC-GTOM will review the supplement for compliance to Appendix 1.

2.3 The ANAC SPO-GCAC-GTOM will issue a new supplement approval letter when the supplement is found acceptable and send it to the AMO.

2.4 The ANAC SPO-GCAC-GTOM will send a copy of the EASA Form 18 and Supplement approval letter to ANAC Foreign 145 Group.

2.5 The ANAC Foreign 145 Group will send a copy of the completed Form 18 and supplement approval letter to EASA.

3 EASA Actions

3.1 EASA will update the list of approved companies on its website.

IV Suspension or Revocation

1 Suspension

1.1 Suspension of the RBAC 145 certificate will automatically render the EASA Part 145 approval letter invalid for the duration of the suspension. As a consequence of this suspension the AMO cannot exercise the privileges of their EASA Part 145 approval in accordance with the Agreement.

1.2 In case of suspension of the RBAC 145 certificate or EASA Part 145 approval letter, ANAC SPO-GCAC-GTOM must inform ANAC Foreign 145 group who will communicate the suspension to the EASA Flight Standards Directorate.

2 Revocation

2.1 Revocation of the RBAC 145 certificate will automatically render the EASA Part 145 approval letter invalid. As a consequence of this revocation all privileges of its EASA Part 145 approval are permanently removed and cannot be re-instated.

2.2 In case of revocation of the RBAC 145 certificate or EASA Part 145 approval letter, SPO-GCAC-GTOM must inform ANAC Foreign 145 group who will communicate the revocation to the EASA Flight Standards Directorate.

3 EASA and ANAC Actions

3.1 Where EASA has reason to request the ANAC to revoke the supplement approval letter, ANAC should take immediate action.

4 Communication

4.1 Each party shall immediately notify the other party of any activities related to the aforementioned certificate action.

V Appendices

Appendix 1: EASA Supplement Contents

In accordance with the Agreement on Aviation Safety between the European Union and Brazil, each AMO maintaining aircraft registered in an EU Member State or components intended for installation thereon, shall include in its Maintenance Organisation Manual a supplement in accordance with Annex B Appendix B1 Section 1 “EASA Special Conditions Applicable to Brazilian Based Maintenance Organisations”.

Appendix 2: Example EASA Supplement

EASA SUPPLEMENT REFERENCE NO.

TO RBAC 145 MAINTENANCE Organisation MANUAL REF

Company Name and Facility Address:

ANAC MAINTENANCE ORGANISATION NUMBER

EASA Part 145 Approval Number:

Compliance with the EASA approved Supplement together with the ANAC accepted Maintenance Organisation Manual forms the basis by which an AMO can exercise the maintenance privileges under the Agreement.

The Maintenance Organisation (MO) must always retain at its principal place of business a current copy of this EASA Supplement in English and provide it to EASA upon request.

The cover page of the EASA Supplement should include the intent of the above statement

Note: This Sample EASA Supplement gives guidance on the subjects that need to be addressed and translated into working procedures to ensure compliance with the EASA Special Conditions. **The applicant must customise the supplement to reflect the specific maintenance organisation operation and related procedures.**

SUMMARY

<u>1</u>	<u>LIST OF EFFECTIVE PAGES</u>	52
<u>2</u>	<u>AMENDMENT PROCEDURE</u>	52
<u>3</u>	<u>INTRODUCTION</u>	52
<u>4</u>	<u>ACCOUNTABLE MANAGER'S COMMITMENT STATEMENT</u>	52
<u>5</u>	<u>APPROVAL BASIS AND LIMITATION</u>	53
<u>6</u>	<u>ACCESS BY EASA AND ANAC</u>	53
<u>7</u>	<u>WORK ORDERS/CONTRACTS</u>	54
<u>8</u>	<u>APPROVED DESIGN AND REPAIR DATA</u>	54
<u>9</u>	<u>AIRWORTHINESS DIRECTIVES</u>	55
<u>10</u>	<u>RELEASE AND ACCEPTANCE OF COMPONENTS</u>	56
<u>11</u>	<u>RELEASE OF AIRCRAFT AFTER MAINTENANCE</u>	58
<u>12</u>	<u>REPORTING OF UNAIRWORTHY CONDITIONS</u>	59
<u>13</u>	<u>QUALITY ASSURANCE SYSTEM (QAS)</u>	59
<u>14</u>	<u>PROVISION OF HANGAR SPACE FOR AIRCRAFT MAINTENANCE</u>	61
<u>15</u>	<u>CONTRACTED MAINTENANCE</u>	61
<u>16</u>	<u>HUMAN FACTORS</u>	63
<u>17</u>	<u>LINE STATIONS</u>	64
<u>18</u>	<u>WORK AWAY FROM FIXED LOCATIONS</u>	64
<u>19</u>	<u>ACCEPTABILITY OF MANUFACTURED/MAINTAINED PARTS</u>	65
<u>20</u>	<u>ENGLISH PROFICIENCY</u>	65

1 LIST OF EFFECTIVE PAGES

(Self-Explanatory)

2 AMENDMENT PROCEDURE

2.1 This section should describe the procedures the organization shall use to ensure the EASA supplement remains current and should specify that amendments must be submitted to the ANAC for approval. The working practices and procedures must be reflected in the RBAC145 Maintenance Organisation Manual and, if appropriate, in this EASA Supplement. In addition, this paragraph should identify who within the organization is responsible for approving amendments and for ensuring that all amendments to the supplement are submitted to the ANAC for approval.

2.2 Failure to ensure that the RBAC 145 Maintenance Organisation Manual and this EASA Supplement are kept up to date in respect of regulatory changes and that the maintenance organisation staff comply with the procedures therein could invalidate the EASA Approval.

2.3 Changes to the MAG shall be implemented, as applicable, within 90 days after the change has been published, unless otherwise specified.

3 INTRODUCTION

3.1 This paragraph should address why the supplement is necessary. EASA Part 145 is the European requirement similar to RBAC 145.

3.2 The Maintenance Annex agreed to by the ANAC and EASA specifies the basic differences between EASA Part 145 and RBAC 145 and identifies these differences as special conditions.

3.3 A RBAC 145 Maintenance Organisation can be EASA Part 145 approved when the maintenance organisation complies with the maintenance special conditions as detailed in this procedure in addition to complying with RBAC 145 and 43.

3.4 The supplement should help ensure that the organization is working in accordance with the provisions of the Agreement and that the differences between the EASA and ANAC regulations are taken into account.

4 ACCOUNTABLE MANAGER'S COMMITMENT STATEMENT

4.1 This paragraph represents the Agreement by the Accountable Manager that the organization will comply with the conditions specified in the supplement whilst operating under its EASA Part 145 approval. It includes recognition of the consequences of failing to meet either requirements or standards.

4.2 The accountable manager is normally intended to mean the chief executive officer of the organization, who, by virtue of position, has overall responsibility (including appropriate financial authority) for running the organization. When the accountable manager is not the chief executive officer, he must have direct access to the chief executive officer and have a sufficiency of maintenance funding allocation.

4.3 An acceptable statement for this paragraph would be:

This supplement in conjunction with the accepted RBAC 145 Maintenance Organisation Manual [insert MOM reference here as applicable] defines the organization and procedures upon which EASA approval is based.

“These procedures are approved by the undersigned, and must be adhered to, as applicable, when maintenance work/orders are being performed under the conditions of the EASA Part 145 approval.

“It is accepted that the maintenance organisation’s procedures do not override the necessity of complying with any additional requirements formally published by the EASA and notified to this organization from time to time.

“It is understood that the EASA lists this maintenance organisation in an EASA published list as long as the EASA is satisfied that the procedures are being followed and work standards maintained. It is further understood that EASA reserves the right to revoke the approval if EASA considers that procedures are not followed, or standards not upheld.”

4.4 This statement shall be signed and dated by the Accountable Manager for and on behalf of the maintenance organisation.

4.5 Please note that whenever the Accountable Manager is replaced, the new Accountable Manager must sign the statement to ensure continuous EASA Part 145 Approval and provide the responsible ANAC inspector with the amendment of the supplement.

5 APPROVAL BASIS AND LIMITATION

5.1 EASA approval is based upon compliance with RBAC 145 and 43 except where varied by the special conditions specified in the Maintenance Annex and associated guidance. However, this approval must not exceed the ratings permitted by Commission Regulation (EU) No. 1321/2014.

5.2 The approval of maintenance work is limited to the scope of work permitted under the current certificate issued by the ANAC to the Maintenance Organisation in accordance with RBAC 145 for work carried out within Brazil. Deviations have to be agreed on a case-by-case basis by the JSCM.

5.3 The AMO certificated by ANAC that has more than one place of business (secondary bases) may exercise the same privileges as established in the ANAC certification at those bases for the EASA approval. If desired to restrict the EASA approval to a limited number of ANAC certificated secondary bases these should be clearly identified in this chapter of the supplement.

Note 1: All secondary bases used as EASA Line Stations must be properly identified. For EASA Line Stations check chapter 17 of this section.

Note 2: The AMO quality assurance system must include all the EASA approved facilities. Check detailed procedures in chapter 13.

6 ACCESS BY EASA AND ANAC

6.1 The supplement should confirm that the maintenance organisation agrees to provide access to EASA and ANAC to ascertain compliance with RBAC 145, the EASA Special Conditions, procedures and standards and to investigate specific problems.

6.2 The supplement should confirm that the organization will accept investigation and enforcement action that may be taken by EASA in accordance with any relevant EU regulations and EASA procedures and that the organization will cooperate with these actions.

Note: This section should be in accordance with the Agreement, Annex B, Appendix B1, paragraph 1.2

7 WORK ORDERS/CONTRACTS

7.1 This section should describe the procedures the Maintenance Organisation shall use to ensure the following:

- a) That the maintenance organisation shall receive clearly stated work orders describing the scope of the work to be accomplished from the customer.
- b) How it ensures the work order specifies the inspections, repairs, alterations, overhaul, airworthiness directives and parts replacement required.
- c) How completeness of and compliance with the customers' work order is ensured.
- d) That the customer remains responsible for correctly informing the Maintenance Organisation by work order of all required maintenance and alterations.

8 APPROVED DESIGN AND REPAIR DATA

8.1 Changes to the type design:

Major Changes, Minor Changes, STCs. The EASA approved design engineering data is normally data supplied by an EASA Design Organization Approval (DOA) holder, or data approved by the National Aviation Authority of the Type Certificate Holder (or equivalent), or data supplied by the customer and approved by the EASA. In all cases, the customer is responsible for confirmation of data approval. Details for the acceptance and/or validation of ANAC approved changes to the type design by EASA are contained in Annex A to the Agreement and in the Technical Implementation Procedures (TIP).

Note: EASA defines “design change” as a change to the type design. EASA does not automatically accept alterations that affect type design.

8.2 Repairs:

- a) ANAC shall approve design data in support of major repairs in accordance with ANAC Procedures Manual (MPR) 900.04 entitled “Aircraft Equipment and Operational Authorizations”. Minor repairs are made in accordance with "acceptable" data, in accordance with RBAC 43.
- b) EASA shall approve design data in support of repairs in accordance with EASA Part 21 Subpart M-Repairs and EASA's procedure Type Certificate Change and Repair Approval.

8.3 EASA Acceptance of ANAC Repair Design Data:

- a) Non-Critical Components:
 - (i) EASA shall accept data used in support of major repairs regardless of the State of Design of the product, part or appliance, if:
 - I) EASA has certificated/validated the product or appliance;
 - II) The ANAC is the authority of the State of Design for the repair design data; and

III) The ANAC repair design data approval is substantiated via an ANAC letter or ANAC Form F-200-6, properly approved and executed ANAC Form F-400-04 (Also referred as also referred as Form SEGV00 001), or a signed cover page of a repair specification.

(ii) EASA shall also accept data used in support of minor repairs when:

I) EASA has certificated/validated the product or appliance;

II) The ANAC is the authority of the State of Design for the repair design data; and

III) The repair design data has been provided by a Brazilian TC/STC or TSOA holder; or

IV) For minor repairs from other than a Brazilian TC/STC or TSOA holder, the determination that data are acceptable (under RBAC 43) has been made by a Brazilian maintenance organization under ANAC's authorized system.

(iii) In these circumstances, repair design data are considered to be EASA-approved following its approval or acceptance under ANAC's system. This process does not require application to EASA or compliance findings to the EASA certification basis

b) Critical Components:

Note: A critical component is defined as a part identified as critical by the design approval holder during the certification process, or otherwise by the exporting authority. Typically, such components include parts for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section or certification maintenance requirements of the manufacturer's maintenance manual or Instructions for Continued Airworthiness.

(i) EASA shall accept any critical component repair design data from a TC/STC holder, regardless of the State of Design of the product, if:

I) EASA has certificated/validated the product; and

II) The ANAC is the authority of the State of Design for the repair design data.

III) In these circumstances, repair design data are considered to be EASA-approved following its approval under ANAC's system. This process does not require application to EASA or compliance findings to the EASA certification basis.

(ii) Repair design data on critical components, developed by organizations/persons that are not the TC/STC Holder, shall be submitted for approval, with an EASA Form 31. Applicants do not need to hold a DOA if the repair data has been approved by the ANAC (refer to the TIP for detailed procedure).

9 AIRWORTHINESS DIRECTIVES

9.1 This section should describe the procedures the Maintenance Organisation will use to address paragraphs below:

a) Explain how the organization ensures it has all EASA ADs applicable to the work it is performing under the ratings it holds.

b) State how the organization will manage and control the distribution and use of ADs. It also should identify how the organization will ensure that it makes the applicable EASA ADs available to its personnel when they perform work under its EASA approval and rating.

c) Include Maintenance Organisation procedures to ensure customer approval/request of the performance of applicable ADs. If the organization does not comply with an applicable AD, its non-

compliance must be recorded in the item's maintenance records. It should describe how this information would be recorded and transmitted to the customer.

10 RELEASE AND ACCEPTANCE OF COMPONENTS

10.1 This section should describe the procedures the Maintenance Organisation will use to ensure that the release to service of components up to and including complete powerplants will be carried out in accordance with RBAC 43, except that Section B of this MAG, Appendix 2, Chapter 7 to 10 shall also be taken into account. At the completion of maintenance, an ANAC Form F-100-01 (also referred as Form SEGVOO 003) shall be issued as a maintenance release by the Maintenance Organisation.

10.2 The ANAC Form F-100-01 (also referred as Form SEGVOO 003) should include the EASA Part 145 release to service certifying statement with the EASA Part 145 Approval Certificate number in block 12, and specify any overhaul, repairs, alterations, Airworthiness Directives, replacement parts, PMA parts and quote the reference and issue/revision of the approved data used.

10.3 An example completed ANAC Form F-100-01 (also referred as Form SEGVOO 003) dual release shall be included by the Maintenance Organisation in the supplement. Instructions shall be included in the supplement specifying that blocks 13 through 17 are not to be used by the Maintenance Organisation.

10.4 The signature of the person returning the component to service shall be in block 19 with the ANAC Maintenance Organisation Certificate number in block 20.

10.5 The status of the component (repaired, inspected, overhauled, etc.) shall appear in block 11 with any relevant comments including detailed references to approved data, Ads, etc., in block 12. Example: "Overhauled in accordance with CMM 111, Section X, Rev 2, S/B 23 and ANAC AD xyz complied with. Full details held on WO 456."

10.6 Block 12 shall also contain the following statement:

"Certifies that the work specified in block 11 was carried out in accordance with EASA Part 145 and in respect to that work the component is considered ready for release to service under EASA Part 145 Approval Number: "EASA 145....."

Note: In the case of maintenance carried out by a Brazilian based EASA Part 145 approved organization subject to the Agreement, EASA only recognises the dual release ANAC Form F-100-01 (also referred as Form SEGVOO 003) for component, engine, or propeller maintenance.

10.7 In case of dual release select both boxes in block 18.

10.8 Please note that the sub clause "except as otherwise specified" present in block 18 is intended for use with two types of deviations as follows:

- a) The case where all required maintenance was not carried out. In this case, list the maintenance not carried out in Block 12 and/or attachments.
- b) The case where the particular maintenance requirement was only EASA approved and not ANAC approved. Example: an EASA Airworthiness Directive not approved by the ANAC.

10.9 The Maintenance Organisation will identify in the MOM roster staff authorized to issue the ANAC Form F-100-01 (also referred as Form SEGVOO 003) on behalf of the Maintenance Organisation.

10.10 The supplement should include information regarding the acceptability of components authorized for use during maintenance that should comply with the next following paragraphs.

10.11 Component means any component part of an aircraft up to and including a complete powerplant and any operational or emergency equipment.

10.12 Only the following new and used components may be fitted during maintenance.

10.13 New Components:

a) New components shall be traceable to the OEM as specified in the Type Certificate (TC) holder's Parts Catalogue and be in a satisfactory condition for installation. A release document issued by the OEM or Production Certificate (PC) holder shall accompany the new component. The release document shall clearly state that it is issued under the approval of the relevant AA under whose regulatory control the OEM or PC holder works.

b) For Brazilian OEMs and PC holders, release shall be on the ANAC Form F-100-01 (also referred as Form SEGVOO 003) as a new part.

c) For all EU Member States OEMs and PC holders, release shall be in accordance with EASA Part 21 on EASA Form 1 as a new part.

d) Acceptable components based on provisions of other bilateral agreements are not addressed in this guidance. Please refer to the individual bilateral agreements or the summary table published on the EASA Web site: <https://www.easa.europa.eu/faq/66700>

e) Standard parts are exempt from the forgoing provisions, except that such parts shall be accompanied by a conformity statement and be in a satisfactory condition for installation.

f) **Note:** EASA Standard Parts Definition per AMC1 M.A.501(a)(4) :

"(a) Standard parts are parts that are manufactured in complete compliance with an established industry, Agency, competent authority or other government specification which include design, manufacturing, test and acceptance criteria, and uniform identification requirements. The specification should include all the information that is necessary to produce and verify conformity of the part. It should be published so that any party may manufacture the part. Examples of such specifications are National Aerospace Standards (NAS), Army-Navy Aeronautical Standard (AN), Society of Automotive Engineers (SAE), SAE Sematec, Joint Electron Device Engineering Council, Joint Electron Tube Engineering Council, and American National Standards Institute (ANSI), EN Specifications, etc.

(b) To designate a part as a standard part, the TC holder may issue a standard parts manual accepted by the competent authority of the original TC holder or may make reference in the parts catalogue to the specification to be met by the standard part. Documentation that accompanies standard parts should clearly relate to the particular parts and contain a conformity statement plus both the manufacturing and supplier source. Some materials are subject to special conditions, such as storage conditions or life limitation, etc., and this should be included in the documentation and/or the material's packaging.

(c) An EASA Form 1 or equivalent is not normally issued and, therefore, none should be expected. "

g) Replacement parts may only be accepted as detailed in EASA Part 21 or in Annex A of the Agreement and TIP.

10.14 Used Components:

a) Used components shall be traceable to Maintenance Organisations approved by the authority who certified the previous maintenance, and in the case of life limited parts, certified the life used. The

used component must be in a satisfactory condition for installation and be eligible for installation as stated in the TC holders Parts Catalogue.

b) An ANAC Form F-100-01 (also referred as Form SEGVOO 003) issued as a dual maintenance release must accompany used components from EASA approved Brazilian based RBAC 145 Maintenance Organisations.

c) Used components from a RBAC 145 Maintenance Organisation not EASA approved will not be used even if accompanied by an ANAC Form F-100-01 (also referred as Form SEGVOO 003).

d) An EASA Form1 issued as a maintenance release shall accompany used components from EASA Part 145 approved maintenance organizations not located in Brazil.

e) Acceptable components based on provisions of other bilateral agreements are not addressed in this guidance. Please refer to the individual bilateral agreements or the summary table published on the EASA Web site: <https://www.easa.europa.eu/faq/66700>

Note: In the case one or more products/articles used are accompanied by a Form containing only an EASA release statement, the use of the ANAC Form F-100-01 (also referred as SEGVOO 003) dual release is NOT possible.

In block 18 only check the box mentioning “Other regulation specified in block 12.” Do not check box that states compliance to RBAC 43.9. In block 12, the following text should be inserted:

“Certifies that the work specified in Block 11 was carried out in accordance with EASA Part 145 and in respect to that work the component is considered ready for release to service under EASA Part 145 approval no._____.

This product/article meets RBAC 43 requirements, except for the following items, and therefore is not eligible to be installed on Brazilian-registered aircraft:”

(List the items)

11 RELEASE OF AIRCRAFT AFTER MAINTENANCE

11.1 The RBAC 43 release to service is acceptable to EASA, provided additional information as described in chapters 7 to 10 of this supplement are considered. This section should describe the procedures that the Maintenance Organisation will use to ensure that the release to service of EU registered aircraft will be carried out in accordance with RBAC 43, except that chapters 7 and 8 of this supplement must be taken into account. At the completion of maintenance, make the following certification in the aircraft maintenance record.

11.2 Return to Service in accordance with RBAC 43 and the following:

“Certifies that the work specified; except as otherwise specified, was carried out in accordance with ANAC airworthiness regulations and additional EASA Special Conditions, and in respect to that work the aircraft is considered ready for release to service.”

11.3 Please note that the sub clause "except as otherwise specified" is intended for use with two types of deviations as follows:

a) The case where all required maintenance was not carried out. In this case, list the maintenance not carried out on the RBAC 43 Return to Service and/or attachments.

b) The case where the particular maintenance requirement was only EASA approved and not ANAC approved. Example: an EASA Airworthiness Directive not approved by the ANAC.

11.4 Where the customer Operator requires its paperwork to be signed, the following alternate certification can be made. The following is only applicable to Maintenance Organisations with airframe rating.

11.5 Release to Service in Accordance with EASA Part 145.A.50:

"Certifies that the work specified, except as otherwise specified, was carried out in accordance with EASA Part145 and in respect to that work the aircraft is considered ready for release to service."

Note: This release statement is acceptable only to EU registered aircraft.

11.6 In all cases, the Maintenance Organisation must issue the certification when all required maintenance has been carried out, except that if it was not possible to complete all maintenance actions requested, then details of the work not performed must be endorsed on the Release to Service and the Operator informed.

11.7 Quote the EASA Part145 Approval Certificate Number and the ANAC RBAC 145 Certificate Number in all cases.

12 REPORTING OF UNAIRWORTHY CONDITIONS

12.1 This section should describe the procedures the Maintenance Organisation will use to ensure that, when serious defects are found in EU registered aircraft or components received from an EU customer, the defects must be reported to EASA, to the aircraft/component design organization, to the state of registry authority and to the customer or Operator within 72 hours. When reporting to the EASA, the identity of the customer must be included to allow follow up action.

a) Explain the procedures the organization will use to ensure that it will submit a report in a form and manner acceptable to EASA containing the information required by EASA Part 145 in English through:

- (i) EASA online platform (preferred) under <http://www.aviationreporting.eu>;
- (ii) ANAC Service Difficulty Report; or
- (iii) ANAC SUP report.

b) Submit this form in accordance with the timeframe specified in EASA Part 145, when reportable problems are found on an aircraft, power plant, propeller, or component thereof that is subject to the regulatory control of EASA.

12.2 Responsibility: Include the title of each person responsible for completing and submitting reports of unairworthy conditions to EASA.

Note: EASA Part 145 occurrence reporting requirements include SUP reporting requirements.

13 QUALITY ASSURANCE SYSTEM (QAS)

13.1 This section should describe the detailed procedures the Maintenance Organisation will use for the operation of an independent QAS and should include the following items.

13.2 The primary objective of the QAS is to enable the organization to satisfy itself that it can deliver a safe product and that it remains in compliance RBAC 43, RBAC 145 and the EASA Special Conditions.

13.3 The QAS should include all the contracted work in accordance with guidance given in Item 15 of the Supplement.

13.4 There are two elements to the system:

a) An independent audit system

(i) The independent audit system is a process of sample audits of all aspects of the Maintenance Organisation's ability to carry out all maintenance to the required standards. It represents an overview of the complete maintenance system and does not replace the need for mechanics to ensure that they carry out maintenance to the required standard nor does it replace any associated inspection/quality control system. Independence shall be established by ensuring that audits are not carried out by the personnel responsible for the function, procedure, or product being audited.

(ii) The audit system shall cover the oversight of all multiple facilities and line stations under the approval and must contain as a minimum the following:

I) Procedural audits. The audits should monitor compliance with required aircraft/aircraft component standards and adequacy of the maintenance procedures to ensure that such procedures invoke good maintenance practices and airworthy aircraft/aircraft components.

II) Product audits. A product audit is the direct observation of a primary product line sample where the auditor observes key steps in the work flow process, from entering the repair station until release to service and shipping. Key steps may include generation and or review of the work order, incoming inspection, AD compliance review, maintenance data, tools and equipment used for the repair, and the witnessing of any relevant processing, testing, and inspection steps used during the repair and final return to service of the product. The sample check should not involve additional disassembly or testing, but should follow the normal process steps that are used by the organization to inspect/repair a product/component.

(iii) It is acceptable to use personnel from one section/department to audit the work and products of another section/department in accordance with a procedure under this paragraph, which defines the audit program.

(iv) The process of sample audits may be carried out once per year as a single exercise or conducted in segments during a period of one year in accordance with the audit program contained in the Supplement. All applicable RBAC 43 and 145 provisions and the EASA Special Conditions as detailed in this guidance should be checked at least once per year against each primary product line.

A primary product line is any one aircraft, engine, avionic, or mechanical product line where the systems and procedures are very similar throughout that product line. A product line includes any rating as specified in the approval. It therefore follows for example that a maintenance organisation with a capability to maintain aircraft, repair engines, brakes and autopilots would need, as a minimum, to carry out four complete product audit sample checks each year. Depending on the complexity and scope of the individual rating the organisation might need to perform additional product audits on additional components within the same rating. For example: on the accessories rating for wheels and brakes, it is expected that at least one product audit for the brake shop and the wheel shop will be performed. If the brake shop performs repairs on steel brakes and carbon brakes, there might even be the necessity for two separated products audits. For base maintenance it is expected that one product audit for each hangar, or one product audit for narrow body and wide body bays is performed. Different locations under the same organisation approval might require additional product audits. Therefore, the total number of required product audits is not a straightforward arithmetical exercise but depends on the individual activity of the organisation.

(v) Maintenance Organisations with fewer than 10 employees may contract the audit function to a person acceptable to EASA who is not employed by the Maintenance Organisation. But in this case the audit of all applicable RBAC 43 and 145 provisions and EASA Special Conditions as detailed in this guidance must be carried out twice per year.

b) A management/control and follow up system

(i) The management control follow up system, which must not be contracted to outside persons, consists of a system to ensure that all findings/discrepancies resulting from the independent audit system are corrected in a timely manner and to enable the accountable manager to remain informed of the state of compliance and any safety issues. The accountable manager should hold routine meetings to check the progress on clearing outstanding findings/discrepancies, except that in the larger Maintenance Organisations such meetings may be delegated on a day-to-day basis to the Quality Manager as long as the accountable manager meets at least once per year with the senior staff involved to review the overall performance.

13.5 Where the Maintenance Organisation has associated line stations and/or additional fixed locations, the system should describe how these are integrated into the system and shall specify the need to audit each line station and/or additional fixed location at least once per year.

13.6 Where applicable, each line station that is used by an aircraft operated under the regulatory control of an EU Operator in accordance with the conditions of the Maintenance Annex should be listed giving its location and the basic maintenance capability at each such location.

13.7 The QAS as specified in this paragraph must be extended to include the need for the approved maintenance organization to audit the listed line station and/or additional fixed locations.

13.8 One example of the particular product line shall be used as the basis of each audit, except in the case of stores audits when a random selection of parts should be used for the audit. It therefore follows that a Maintenance Organisation maintaining aircraft and engines (off aircraft) and mechanical parts (off aircraft) would need to carry out three audit sample checks each year with the particular product type changed each year. A sample audit program is attached in Appendix 3.

13.9 A report shall be prepared for each audit carried out describing what was checked and any resulting findings/discrepancies. The report should be sent to the relevant departments for rectification action giving target rectification dates. The relevant departments are required to rectify the findings/discrepancies and inform the quality department.

13.10 A product should be selected in each hangar and each workshop and the sample audit program conducted at least once per year (twice per year in the case of a Maintenance Organisation with fewer than 10 employees and which chooses to contract the audit to an outside person except that in the case of procedures which are common throughout the Maintenance Organisation, the procedures need only be audited once per year if there are no problems).

14 PROVISION OF HANGAR SPACE FOR AIRCRAFT MAINTENANCE

14.1 This section must describe the procedures the Maintenance Organisation will use to ensure that covered hangar space is used for the Base maintenance of aircraft operated under the regulatory control of an EU Member State undergoing maintenance and/or alteration. When the customer and Maintenance Organisation sign a contract for maintenance, the agreement must confirm that hangar space will be available and will be used at the time of maintenance and alterations.

Note: This section is only applicable to Maintenance Organisations with airframe rating.

15 CONTRACTED MAINTENANCE

15.1 This section should describe the procedures the Maintenance Organisation shall use to ensure that the items to be contracted are specified and that the contract meets the terms of the implementation procedures.

Note 1: When part of the maintenance is contracted to another organization, the Maintenance Organisation must ensure that the other organization is approved to EASA Part-145 for the maintenance they carry out (contracting). If maintenance is contracted to a non-EASA-approved organization (subcontracting), then this is considered to be a Non-certificated Facility. In such a case, the Maintenance Organisation returning the product to service is fully responsible for ensuring its airworthiness.

Note 2: To prevent duplication with the ANAC Maintenance Organisation Manual and the EASA Supplement, it is permissible to make a cross reference to the MOM procedures in the EASA Supplement making a clear reference to where the information is to be found.

15.2 List of Contractors. EASA recognizes RBAC 145 requirements for the Maintenance Organisation Manual to contain a list of all contracted functions utilized by the Maintenance Organisation and accepted by the ANAC as part of the Maintenance Organisation Manual. EASA can accept to use this list also for the purpose of the EASA approval when the list identifies, by an asterisk or other means of identification, those contractor(s) the Maintenance Organisation will use to support maintenance activities for aircraft registered in EU or aeronautical products to be installed on such aircraft. The list should identify the contractors that hold an EASA Part-145 certificate and must also be made available to EASA on request.

15.3 Qualifying and Auditing Contractor.

a) Describe those procedures the Maintenance Organisation will use to both qualify and audit contractors.

b) Contracting to non EASA approved Sources (subcontracting). If the Maintenance Organisation contracts a maintenance work to a non EASA certificated source, the Maintenance Organisation must be appropriately rated itself to perform the work. This section should:

(i) Explain that the Maintenance Organisation is responsible for approving for return to service each item on which work is performed and for ensuring its airworthiness.

(ii) Indicate that any non-EASA approved contractor to which work is contracted must be under the control of the Maintenance Organisation's QAS. Additionally, the Maintenance Organisation must inspect each item on which contracted work has been performed for compliance with this supplement.

(iii) Explain that if the Maintenance Organisation cannot determine the quality of contracted work, the work can only be contracted to an EASA approved facility that is able to test and/or inspect the work performed and issue a return to service for the work performed. If the contracted item must be disassembled by the Maintenance Organisation to determine the quality of the work performed, then it should not be contracted to a non EASA-approved source.

c) Contracting to EASA approved Facilities. This subsection should:

(i) Explain that if the Maintenance Organisation contracts functions to another organization that is EASA approved, the contractor is responsible for approving the return to service for each item on which it has worked.

(ii) Describe the procedures the Maintenance Organisation will use to determine that the EASA approved Maintenance Organisation to which work is contracted is properly certificated to perform that work.

d) Receiving Inspections. This subsection should:

- (i) Describe the Maintenance Organisation's procedures for inspecting the work performed by a contractor on an item that has been returned to service.
 - (ii) Describe the procedures the Maintenance Organisation uses to provide technical training for receiving inspection personnel who inspect contracted work.
 - (iii) Explain the procedures the Maintenance Organisation will use to ensure that items on which contracted work has been performed are properly processed through the organization's receiving inspection procedures.
 - (iv) Explain receiving inspection procedures in enough detail to enable a receiving inspector to make an airworthiness determination of any item received based on a technical review of the contractor's source documentation.
 - (v) Describe the method of recording contractor's work and the record retention period.
- e) Audits. This subsection should:
- (i) Describe the procedures the Maintenance Organisation uses when auditing contractors and the frequency of such audits. It also should explain the procedures for recording the results of such audits, to include the record retention period for the results of each audit.
 - (ii) Describe the procedures the Maintenance Organisation will use to ensure that contractors comply with operators' manuals, manufacturers' manuals, and Instructions for Continued Airworthiness.
 - (iii) Describe how contractors are informed of any changes to these manuals and procedures.

16 HUMAN FACTORS

16.1 This section should describe the procedures the Maintenance Organisation will use to ensure the detection and rectification of maintenance errors that may endanger the safe operation of aircraft. The procedures shall ensure that the ANAC approved initial and recurrent training program and any revision thereto includes human factors training, addressing resources, human performance limitations, shift changeover and how personnel are trained, to ensure an understanding of the application of human factors principles. The following topics should be covered as a minimum:

- a) General/Introduction to human factors
- b) Safety Culture/Organizational factors
- c) Human Error
- d) Human performance and limitations
- e) Environment
- f) Procedures, information, tools and practices
- g) Communication
- h) Teamwork
- i) Professionalism and integrity
- j) Organization's Human Factors program

Note 1: The recurrent human factors training shall not be a simple repetition of the initial training. Instead, it shall be built upon errors/lessons learnt and the experiences within the organisation (or

group of organisations). This would help ensure that the results of internal quality audits and occurrence reports are brought to the attention of all staff.

Note 2: In case the organization outsources the human factors training it has to ensure that such training contains the relevant content as specified above.

17 LINE STATIONS

17.1 The EASA supplement procedure must clearly demonstrate that the quality system covers all facilities where the organisation performs Line Maintenance. It shall be shown how control by the main facility is ensured, that the other facilities operate under the same EASA supplement as the main facility, and the ratings do not exceed those of the main facility. All line stations exercising the privileges of the EASA Part 145 approval must be listed in the EASA supplement together with associated operator, aircraft type, location, and contract specifying the scope of work for that particular operator. A copy of the relevant page of the supplement must also be supplied to EASA as part of the package for initial or change (affecting the list of line stations) to the approval.

18 WORK AWAY FROM FIXED LOCATIONS

If a Maintenance Organisation is requested to perform maintenance on an EU-registered aircraft or article located outside its facilities, the Maintenance Organisation may work away from its fixed location in the following cases:

Note: For both cases listed below, the EASA approval privileges may be used only for urgent defect rectification work (i.e., AOG) performed on EU-registered aircraft or components fitted to such aircraft.

a) **A Maintenance Organisation Not Holding an Authorized Written Procedure (One-time Special Circumstance):** If the EASA supplement or the Maintenance Organisation Manual does not have a written procedure for work away from its fixed location, the Maintenance Organisation must apply to EASA in advance of doing the work. This application must describe the work to be performed, the date of the work, the customer, and certify to EASA that the Maintenance Organisation will follow all existing procedures in its current Maintenance Organisation Manual and EASA Supplement. (The application is to be sent to foreign145@easa.europa.eu) EASA will review the application and answer the organization in writing, with a copy to the ANAC, either accepting or rejecting the application. If the application is rejected, the reasons will be specified in the communication.

b) **A Maintenance Organisation Holding an Authorized Written Procedure (On a Recurring Basis):** This occurs when necessary and is subject to the ANAC acceptance of the procedures described on the Maintenance Organization Manual being in place for this work and only to perform non routine maintenance, to be defined in this guidance as urgent defect rectification (i.e. AOG situations), on an EU-registered aircraft or articles intended for installation on EU-registered aircraft. The ANAC Maintenance Organisation Manual (MOM) defines the procedural requirements that the Maintenance Organisation should use. It is permissible to prevent duplication to make a cross reference to the MOM procedures in the EASA supplement for this aspect. Within Brazil, the responsible inspector shall be informed and notification to EASA is not required. Outside Brazil, the responsible inspector shall be informed and notification to EASA shall be sent prior to commencing the work to the following e-mail address: foreign145@easa.europa.eu.

Note: This paragraph is not applicable to line stations addressed in Section B, Appendix 2, paragraph 17 of this MAG.

19 ACCEPTABILITY OF MANUFACTURED/MAINTAINED PARTS

19.1 Please refer to paragraph 10 for details concerning the Agreement between Brazil and the European Union. Further information about parts acceptability under EASA regulation and various international agreements (e.g. US, Canada) has been published on the EASA website: https://www.easa.europa.eu/sites/default/files/dfu/Parts%20Table%20EASA%20MMT%20Final_FS1.1%2B1.4.pdf

20 ENGLISH PROFICIENCY

20.1 This section shall include procedures for the maintenance organization to ensure that all supervising staff and all staff releasing components and/or complete aircraft to service have the capability to read, write and communicate in English language. This procedure shall also ensure that all other personnel working under the EASA approval fully comprehend the technical information, e.g. TC holder manuals, repair instructions, logbook entries, Airworthiness Directives and others, whenever these are presented in the English language.

Appendix 3: Sample Audit Program, EASA Supplement Brazilian Maintenance Organizations

AUDIT SUBJECT	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
RBAC 43.7 Persons authorized to return to service												
RBAC 43.9 Contents of Maintenance and Alteration Records												
RBAC 43.12 Falsification of Records												
RBAC 43.13 Standards												
RBAC 43.15 Additional Standards												
EASA Supplement 4 Accountable Manager Statement												
EASA Supplement 7 Customer Work Order												
EASA Supplement 8 Approved Design and Repair Data												
EASA Supplement 9 Airworthiness Directives												
EASA Supplement 10 Release and Acceptance of Components												
EASA Supplement 11 Aircraft Release or Return to Service												

AUDIT SUBJECT	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
EASA Supplement 12 Reporting Unairworthy Conditions												
EASA Supplement 13 Quality Assurance System												
EASA Supplement 14 Hangar Space												

AUDIT SUBJECT	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
EASA Supplement 15 Contracted Maintenance												
EASA Supplement 16 Human Factors												
EASA Supplement 17 Line Stations												
EASA Supplement 18 Work away from Fixed Location												
EASA Supplement 19 Acceptability of Manufactured/Maintained Parts												
EASA Supplement 20 English proficiency												

Audit details are contained in the associated audit report

Table KEY: / = planned, X = performed

Prepared: Date, sign Quality Manager

Accepted: Date, sign Accountable Manager

Appendix 4: Application form (EASA Form 18)

European Union Aviation Safety Agency Brazilian MO application for initial / continuation of a Maintenance Approval in accordance with the Bilateral Agreement between the European Union and Brazil on Civil Aviation Safety.	EASA Form 18 Page 1 of 2	
For the Applicant:		
1. RBAC 145 MO name:	RBAC 145 certificate number:	
2. Address of MO:		
3. Mailing Address (if different from 2 above):		
4. Tel:	Fax:	Main Contact E-mail:
3. Please select the type of application and complete the section 6 of the Form 18 a. Initial <input type="checkbox"/> b. Continuation <input type="checkbox"/> c. Change <input type="checkbox"/>		
(in case of continuation and or change) EASA Part 145 approval number: EASA.145. _____		
6. Application: I wish to apply on behalf of this MO for an approval to perform maintenance on EU products in accordance with the Agreement concluded between the European Union and Brazil on Civil Aviation Safety. I understand that a maintenance approval granted under the terms and conditions of the bilateral agreement between the European Union and Brazil is subject to the fees described in the European Commission Regulation (EU No 2019/2153 ⁽¹⁾) and that failure to demonstrate continued compliance to Fees and Charges regulation may result in the invalidity of an initial application or in the revocation of an existing maintenance approval. I additionally understand that no technical investigation in relation with an initial application to a maintenance approval will be carried out until payment of applicable fees has been honoured ⁽²⁾ . Date: Name & Signature of the MO Accountable Executive:		
Note: This application form shall be addressed to the ANAC SPO-GCAC-GTOM in charge of the AMO surveillance, together with documents supporting the application, and in particular the EASA Supplement to the Maintenance Organisation Manual.		
For ANAC Inspector: Please process this application in accordance with ANAC internal procedures		

For EASA:

8a. Initial Application

EASA hereby confirms that the applicant: ANAC MO # _____, has paid the fees in relation with the above described application, and therefore EASA authorises the granting by ANAC of the EASA Part 145 approval:

EASA.145.XXXX

to perform maintenance on EU products once it has been satisfied compliance of the MO to applicable regulatory requirements.

Name:

Date:

Please forward this acknowledgement to:

ANAC

e-mail: foreign145@anac.gov.br

9.

To be filled by EASA in case of non-compliance

EASA hereby informs ANAC that the applicant has failed to demonstrate compliance with the fees and charges and that the application/ continuation of the EASA Approval is rendered invalid.

(This information is to be forwarded to ANAC at the above-mentioned address)

Name

Date:

Note on fees and charges

1. For information regarding the current fees and charges please refer to the EASA fees and charges regulation which can be found on the EASA web site www.easa.europa.eu
2. Upon receipt of an application Form 18 for initial approval, EASA will address to the applicant an invoice containing details related to payment methods.
3. For continuation of EASA approval, EASA will invoice the applicant on an annual basis.

Appendix 5: Approval Letter Template

Place of issue, MM-DD-YYYY

Subject: EU / Brazil Agreement - Supplement Approval Letter

Dear Sir or Madam,

1. Considering the maintenance procedures covered by Annex B to the Agreement between European Union (EU) and the Federative Republic of Brazil on Civil Aviation Safety and MAG (Maintenance Annex Guidance), this is to inform you that [Organisation Name], [ANAC approval number xxx], EASA Supplement [revision xx], dated [__/__/____] is hereby approved by ANAC.

2. The EASA Part-145 approval reference is:

[Organisation Name]

EASA Part-145 Approval Reference number: XXXX

Valid until: [--/--/----]

3. This supplement approval allows performing maintenance services on European Union registered aircraft and components intended to be installed thereon subject to compliance with the Brazilian regulation RBAC 43 and 145 and the EASA special conditions as detailed in the Agreement Annex B Appendix B1 and the Maintenance Annex Guidance (MAG).

4. Please be reminded that the EASA approved scope of ratings and limitations must not exceed the ones specified in your ANAC RBAC 145 Certificate and Operations Specifications.

5. You are reminded that you will be required to submit your next application for renewal 60 days prior to the expiration date indicated in paragraph 2 of this letter in accordance with MAG Section B which is available on the ANAC web site at: <https://sistemas.anac.gov.br/certificacao/Acordos/AcordosPais.asp?PaisCodi=0096>

Best regards,

[NAME of ANAC Responsible]

Position of ANAC Responsible

Section C: Approval process for EU Based Maintenance Organizations

Introduction

This Guidance details how EASA and NAAs will implement the Bilateral Agreement and Annex B between the European Union and Brazil for EASA Part 145 Approved Maintenance Organisations located in the European Union.

I Initial Approval Process

1 Introduction

1.1 Any maintenance organisation that has been certified by a NAA to perform maintenance functions willing to be approved in accordance with RBAC 145 shall be required to have a supplement to its maintenance organisation manual in order to comply with the requirements set out in Section 8 of Annex B to the EU / Brazil Agreement and its Appendix. When it is satisfied that the supplement meets the requirements set out in Section 8 of Annex B and its Appendix, the said NAA shall issue an approval attesting compliance with the applicable Brazilian requirements and specifying the scope of tasks that the maintenance organisation can perform on aircraft registered or operated under the provisions of Brazilian regulations. Such scope of ratings and limitations shall not exceed that contained in its own certificate.

2 NAA Action

Upon receipt of a request for supplement approval in accordance with this Agreement, NAA shall ensure that the applicant has access to the most current revision of the MAG and the ANAC Application Form F-900-81.

3 Applicant Action

3.1 To apply for approval under the provisions of the Agreement Annex B, an applicant AMO must:

- a) Be located in the one of the EU Member States;
- b) Hold an EASA Part-145 approval;
- c) Demonstrate a need to maintain or alter Brazilian registered aeronautical products or foreign registered aeronautical products operated under the provisions of Brazilian regulations;

Note 1: The evidence for the demonstration of need may be in the form of a Letter of Intent (LOI), work order, or a contract with details of the relevant customer. A relevant customer may be a Brazilian based Maintenance Organisation or a Brazilian operator, distributor, or lessor.

Note 2: The ANAC form F-900-81 is available at the following website: <https://sistemas.anac.gov.br/certificacao/Form/Form.asp>

3.2 The applicant shall:

- a) Complete the ANAC Application Form F-900-81; and
- b) Establish an ANAC Supplement to the Maintenance Organisation Exposition in accordance with the supplement guidance material (see Appendix 1 and Appendix 2 of this Section).

3.3 The ANAC Application Form F-900-81 plus the proposed ANAC Supplement should be sent to the NAA at least 90 days prior to the required initial approval date.

Note 1: The above documents shall not be sent to ANAC by the applicant.

Note 2: The ANAC form F-900-81 is available at the following website: <https://sistemas.anac.gov.br/certificacao/Form/Form.asp>

4 NAA/ANAC Actions

4.1 The NAA shall send the ANAC Form F-900-81 to the ANAC Foreign 145 Group by email (foreign145@anac.gov.br).

4.2 ANAC Foreign 145 Group will send to the applicant organization instructions for the fee payment. After payment confirmation, the ANAC Foreign 145 Group will notify, by e-mail, the NAA that the process can continue and identify (on the e-mail) the ANAC approval number to be used in the process.

4.3 The NAA shall review the ANAC Supplement for compliance with Appendix 1 and Appendix 2 of this Section.

4.4 Where the Supplement is found satisfactory, the NAA shall issue a letter attesting that the ANAC supplement is approved. It should also include the following information:

- a) The ANAC approval number to the AMO;
- b) The expiry date of the approval calculated as the Supplement approval date plus 24 months;
- c) Explicitly specify that the scope of ratings and limitations shall not exceed the ones specified in the organisations EASA Part 145 certificate and scope of approval.

Note: A template to be used in the approval letter can be found in Section C Appendix 3.

4.5 Once approved, the ANAC supplement and the privileges associated with it shall remain in force for 24 months unless surrendered, suspended or cancelled by the NAA or ANAC.

4.6 The NAA will ensure that activities conducted in accordance with the supplement are part of their oversight of the organization.

4.7 The NAA shall forward a copy of the supplement approval letter to ANAC Foreign 145 Group.

4.8 ANAC in turn will publish the approval on the ANAC website: <https://sistemas.anac.gov.br/certificacao/AvGeral/AIR145BasesEstrg.asp>

II Continuation Process

1 Introduction

1.1 To continue to be approved in accordance with RBAC 145, pursuant to the terms of Appendix to Annex B, the AMO shall comply with the following, subject to verification by the NAA:

- a) Allow ANAC, or the NAA on behalf of the ANAC, to inspect it for continued compliance with the requirements of EASA Part 145 and the ANAC Special Conditions presented in the Appendix B1 of the Annex B;
- b) Accept that investigations and enforcement may be undertaken by the ANAC in accordance with ANAC rules and directives;
- c) Cooperate with any investigation or enforcement action;
- d) Continue to comply with EASA Part 145 and ANAC Special Conditions.

2 NAA Actions

2.1 The NAA ensures every 24 months that the conditions for approval continue to be met. The regular NAA oversight should systematically include ANAC special conditions verification at principal place of business, additional locations and line stations of the organizations. Where the conditions are not met, the NAA shall take appropriate action and notify ANAC with copy to EASA Flight Standards, Maintenance and Production Department.

3 Applicant Actions

3.1 The applicant shall submit the following to the NAA:

- a) A completed ANAC Application Form F-900-81 indicating continuation and/or change as required.
- b) Demonstrate the need to maintain or alter aeronautical products registered or operated under the provisions of Brazilian Regulations RBAC.
- c) If the continuation is submitted together with a change, a current copy of their ANAC MOE supplement.

Note 1: The evidence for the demonstration of need for the continuation process may be in the form of a completed work order (dual release SEGVOO003) or release of a European registered aircraft, a Letter of Intent (LOI), work order, or a contract with details of the relevant customer. A relevant customer may be a European based Maintenance Organisation or a European operator, distributor, or lessor.

Note 2: The ANAC form F-900-81 is available at the following website: <https://sistemas.anac.gov.br/certificacao/Form/Form.asp>

4 NAA and ANAC actions

4.1 The NAA will review the submitted ANAC Form F-900-81 for completeness and legibility.

4.2 The NAA will review the supplement for compliance to Appendices of this Section (if submitted).

4.3 The NAA will issue a new supplement approval letter with the new expiry date, calculated adding 24 months from the previous expire date. Additionally, if submitted a supplement revision, the NAA will update the revision number in the approval letter when the document is found acceptable.

4.4 The NAA will forward the ANAC Form F-900-81 and approval letter to ANAC Foreign 145 Group.

4.5 The ANAC Foreign 145 Group will send to the organization instructions for the fee payment. After payment confirmation, the ANAC Foreign 145 Group will update the approval expire date on the ANAC website.

4.6 The ANAC shall notify the NAA if the applicant has failed to make the fee payment within 90 days from invoice date.

4.7 Where ANAC has reason to recommend to NAA not to continue the approval, ANAC should immediately inform EASA Flight Standards Maintenance and Production department and the NAA who will take appropriate action.

5 Late Applications

5.1 The applicant is expected to apply 60 days prior to their continuation due date. The NAA will accept late applications up to 30 days beyond the continuation due date.

Note: After the expiry date of the supplement approval letter the organisation can no longer exercise the privileges of their ANAC approval, i.e. do not release components with a FORM 1 dual or release aircraft registered in Brazil or products to be installed there on.

5.2 If the applicant fails to apply for continuation within the above specified time frame, their approval cannot be continued, it shall be rendered invalid and an initial application must be initiated by the applicant.

6 Surrender of approval

Where a company surrenders its approval, the NAA will notify ANAC Foreign 145 Group to remove the company from the list of approved companies on its website.

III Amendment process

1 Applicant actions

1.1 The following changes to an organisation require the submission of an ANAC Form F-900-81 and associated amended supplement to the NAA:

- a) Change of Address.
- b) Change of Accountable Manager; or
- c) Change of Organisation Name and/or Approval Number.

2 NAA/ANAC actions

2.1 The NAA will review the submitted ANAC Form F-900-81 for completeness and legibility.

2.2 The NAA will send the Form F-900-81 by e-mail to ANAC foreign 145 Group (foreign145@anac.gov.br).

2.3 ANAC Foreign 145 Group will send an e-mail to NAA authorizing or not the approval continuation.

2.4 The NAA will review the supplement for compliance with the Appendices of this Section.

2.5 The NAA will issue a new supplement approval letter when the supplement is found acceptable and sent it to the applicant.

2.6 The NAA will send a copy of the Supplement approval letter to ANAC Foreign 145 Group.

Note: The ANAC Form F-900-81 is available at the website: <https://sistemas.anac.gov.br/certificacao/Form/Form.asp>

3 ANAC Actions

3.1 ANAC Foreign 145 Group will update the list of approved companies on its website accordingly.

3.2 The ANAC will send to the organization instructions for the fee payment in case of change of Address, Organisation Name and/or Approval Number.

IV Suspension or Revocation

1 Suspension

1.1 Suspension of the EASA Part 145 Approval will automatically render the Brazilian RBAC 145 supplement approval letter invalid for the duration of the suspension. As a consequence of this suspension the AMO cannot exercise the privileges of their RBAC 145 approval in accordance with the Agreement.

1.2 In case of suspension of the EASA Part 145 Approval or ANAC RBAC 145 approval letter, the Competent Authority must inform the ANAC Foreign 145 group and the EASA Flight Standards Directorate.

2 Revocation

2.1 Revocation of the EASA Part 145 Approval will automatically render the Brazilian RBAC 145 supplement approval letter invalid. As a consequence of this revocation all privileges of its RBAC 145 approval are permanently removed and cannot be re-instated.

2.2 In case of revocation of the EASA Part 145 Approval or ANAC RBAC 145 approval letter, the Competent Authority must inform the ANAC Foreign 145 group and the EASA Flight Standards Directorate.

3 ANAC and NAA Actions

3.1 Where ANAC has reason to request the NAA to revoke the supplement approval letter, the NAA should take immediate action and inform EASA Flight Standards, Maintenance and Production department.

4 Communication

4.1 Each party shall immediately notify the other party of any activities related to the aforementioned certificate action.

V Appendices

Appendix 1: ANAC Supplement Contents

In accordance with the Agreement on Aviation Safety between the European Union and Brazil, each AMO willing to maintain or alter Brazil registered aeronautical products or foreign registered aeronautical products operated under the provisions of Brazilian regulations, shall include in its Maintenance Organisations Exposition a supplement in accordance with Annex B Appendix B1 Section 2 of the agreement: “ANAC Special Conditions Applicable to EU Based Approved Maintenance Organisations (AMOs)”.

The Appendix 2, in the following pages, contain an example of the ANAC Supplement to be used as guidance. It should be noted that:

a) The AMOs shall develop the supplement in accordance with the existing organisation structure, procedures and policies. The example included in this appendix is only for the purpose of providing general guidance on the subjects, which need to be addressed and translated into working procedures to ensure compliance with the ANAC Special Conditions. It is not acceptable to submit a supplement based on a purely copy and paste exercise. The supplement must therefore be customised to satisfy the specific approved maintenance organisation procedures.

b) The supplement should be written in English.

c) The supplement should be available to the certifying staff at all locations where work under Annex B is performed.

Appendix 2: Example ANAC Supplement

ANAC SUPPLEMENT to Part 145 Maintenance Organisation Exposition

Company Name and Facility Address:

.....

ANAC Approved Maintenance Organisation Number:

EASA Part 145 Approval Number:

Compliance with the EASA Approved MOE together with the ANAC approved Supplement forms the basis by which an AMO can exercise the maintenance privileges under the EU / Brazil Agreement Annex B.

The Approved Maintenance Organisation (AMO) must always retain at its principal place of business a current copy of this ANAC Supplement in English and provide it to ANAC upon request.

The cover page of the ANAC Supplement should include the intent of the above statement

Maintenance, alterations, or modifications performed in accordance with the Maintenance Organisation Exposition (MOE), (hereinafter referred to as manual) including this Supplement, are considered to be in compliance with RBAC 43 and 145.

Contents of the ANAC Supplement to the manual (MOE) should include at least the following sections as applicable.

Note: If any or all items identified below are already contained in English in the MOE, then all that is needed is to reference the appropriate MOE manual, section, and pages to meet the supplement requirements.

SUMMARY

<u>1</u>	<u>LIST OF EFFECTIVE PAGES</u>	81
<u>2</u>	<u>AMENDMENT PROCEDURES</u>	81
<u>3</u>	<u>INTRODUCTION</u>	81
<u>4</u>	<u>ACCOUNTABLE MANAGER'S STATEMENT</u>	81
<u>5</u>	<u>APPROVAL BASIS, SCOPE AND LIMITATION</u>	82
<u>6</u>	<u>SUMMARY OF THE QUALITY SYSTEMS</u>	83
<u>7</u>	<u>APPROVAL FOR RELEASE AND RETURN TO SERVICE AFTER MAINTENANCE OR ALTERATION</u>	83
<u>8</u>	<u>REPORTING OF FAILURES, MALFUNCTIONS OR DEFECTS AND SUSPECTED UNAPPROVED PARTS (SUP) TO ANAC</u>	89
<u>9</u>	<u>ADDITIONAL OPERATING LOCATIONS INCLUDING LINE STATIONS</u>	89
<u>10</u>	<u>WORK AWAY FROM A FIXED LOCATION</u>	90
<u>11</u>	<u>CONTRACTING / SUBCONTRACTING</u>	91
<u>12</u>	<u>MAJOR REPAIRS AND MAJOR ALTERATIONS</u>	93
<u>13</u>	<u>COMPLIANCE WITH BRAZILIAN AIR CARRIER'S CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM (CAMP)</u>	94
<u>14</u>	<u>COMPLIANCE WITH MANUFACTURERS' MAINTENANCE MANUALS OR INSTRUCTIONS FOR CONTINUED AIRWORTHINESS (ICA)</u>	95
<u>15</u>	<u>ANAC AIRWORTHINESS DIRECTIVES (AD)</u>	96
<u>16</u>	<u>QUALIFICATIONS OF PERSONNEL</u>	96
<u>17</u>	<u>CAPABILITY TO COMPREHEND THE PORTUGUESE LANGUAGE</u>	96
<u>18</u>	<u>RECORD KEEPING</u>	97
<u>19</u>	<u>AIRWORTHINESS VERIFICATION CERTIFICATE - CVA (FORMER ANNUAL MAINTENANCE INSPECTION - IAM)</u>	97
<u>20</u>	<u>FORMS</u>	100

1 LIST OF EFFECTIVE PAGES

(Self-Explanatory)

2 AMENDMENT PROCEDURES

2.1 The amendment procedures section should describe the procedures the organisation will use to ensure that the ANAC Supplement remains current. It should identify, by title, the person responsible for revising the ANAC Supplement. It also should describe the procedures the organisation will use to ensure that copies of any revision to the supplement are provided to the NAA before implementation. ANAC requires that at least one copy of the supplement be retained by the NAA, however the NAA may require a second copy in the national language. The procedures to ensure keeping the supplement updated should be part of the organization's management system. All revisions must be incorporated into the internal quality system (QS), including the audit system. Changes to the MAG shall be implemented, as applicable, within 90 days after the change has been published, unless otherwise specified.

3 INTRODUCTION

3.1 The introduction section should address the following:

- a) Indicate that the ANAC Supplement, together with other chapters of the approved NAA manual of exposition (MOE), defines the organisation and procedures that comply with applicable regulation.
- b) State that the Annex B of the agreement permits the maintenance organisation in EU to be approved as a foreign maintenance organisation under RBAC 145 to perform work on aeronautical products operated under the provisions of the RBAC.
- c) An EASA Part 145 AMO can be approved as a RBAC 145 maintenance organisation when the AMO complies with EASA Part-145 in conjunction with the ANAC special conditions as detailed in these procedures.
- d) State that the ANAC Supplement describes the methods and procedures the organisation will use to ensure compliance with the ANAC Special Conditions. These conditions are specified in the Annex B Appendix B1 section 2 to the Agreement.

4 ACCOUNTABLE MANAGER'S STATEMENT

4.1 Accountable manager means the person designated by the certificated maintenance organisation who is responsible for and has the authority over all maintenance organisation operations that are conducted under RBAC 145, including ensuring that maintenance organisation personnel follow the regulations and serving as the primary contact with the ANAC.

4.2 The accountable manager is the individual responsible for the organization's compliance with RBAC 43 and 145. Such compliance is demonstrated by adhering to EASA regulations, requirements, and associated material and the ANAC Special Conditions in the Annex B Appendix B1 section 2. This section must contain the signed statement by the accountable manager.

4.3 With this statement, the Accountable Manager agrees that the organisation will comply with the Special Conditions specified in the ANAC Supplement while operating under its ANAC maintenance organisation approval.

4.4 An acceptable statement for this section would be:

I understand that this organisation, [name of company], when performing maintenance or alteration on Brazil registered aeronautical products or foreign registered aeronautical products operated under the provisions of Brazilian regulations, must perform that work under the terms of the Annex B to the Agreement between the Federative Republic of Brazil and the European Union, its associated ANAC Special Conditions, EU regulations and associated guidance material, and ANAC Supplement to the Maintenance Organisation Exposition.

As the person with overall control of [name of company], I have reviewed the EU regulations and the ANAC Special Conditions. This organisation fully understands that by complying with these documents, it will be complying with the corresponding sections of RBAC 43 and 145, and other applicable regulations. I understand that failure to comply with the requirements of RBAC 43 or 145 may result in the amendment, suspension, or revocations of the ANAC certification, or enforcement action by the [NAA] or ANAC. I also understand that loss of [NAA] approval will require ANAC enforcement action that may result in the suspension or revocation of the organisation's RBAC 145 maintenance organisation certificate.

This organisation will provide [NAA], EASA and ANAC personnel with access to our facilities to assess compliance with [NAA] requirements and ANAC Special Conditions or to investigate specific problems.

I understand that this organisation may be subject to ANAC enforcement procedures. I understand that investigation and enforcement by the ANAC regarding suspected violations of RBAC by this organisation will be undertaken in accordance with ANAC rules and directives, and that this organisation must cooperate with any investigation or enforcement action.

I agree to ensure that this ANAC Supplement will be maintained and kept current by this organisation and be accessible to all personnel. I further agree to submit revisions to this Supplement to [NAA] for approval before implementing any such revisions."

4.5 The statement must be signed and dated by the accountable manager.

4.6 Whenever the organisation's accountable manager is replaced, the new accountable manager must sign and date a new accountable manager's statement. The organisation will forward a copy of the newly signed statement to the NAA.

5 APPROVAL BASIS, SCOPE AND LIMITATION

5.1 This paragraph must address the approval basis, scope and limitation of the respective Maintenance Organisation.

5.2 An acceptable statement for this paragraph could be:

"ANAC AMO Approval is based upon compliance with EASA Part 145 except where varied by the conditions specified in the Agreement and associated MAG.

The approval of maintenance is limited to the scope of work permitted under the current approval issued by the NAA to the Maintenance Organization in accordance with Part 145."

6 SUMMARY OF THE QUALITY SYSTEMS

6.1 The management and quality systems section will include a version in English of the organisation's management system and a summary of its quality system covering the main site, additional fixed locations, and Line Stations. The summary will contain an overview of how the AMO will include ANAC Special Conditions in its QS.

Note: If the maintenance organisation has this section in its MOE and that section is available in English, this same process can be referenced in this section, provided the process is in English and can be made available to the ANAC upon request.

7 APPROVAL FOR RELEASE AND RETURN TO SERVICE AFTER MAINTENANCE OR ALTERATION

7.1 Return to Service of a Brazilian-Registered Aircraft:

- a) This paragraph, if applicable, must contain a procedure for return to service of Brazilian - registered aircraft, in accordance with the requirements of RBAC 43
- b) Maintenance release in accordance with RBAC 43, includes the following elements:
 - (i) A description (or reference to the data acceptable to ANAC) of the work performed;
 - (ii) The date of completion of the work;
 - (iii) The name of the person who performed the service, if that person is different from the person specified in paragraph (b) (iv) of this section;
 - (iv) The signature of the person authorized by the maintenance organisation to return the aircraft to service;
 - (v) The ANAC RBAC 145 maintenance organisation approval number;
 - (vi) Additional requirements specified by the operator; and
 - (vii) The recordkeeping requirements for major repairs and major alterations.
- c) When making use of ANAC RBAC 145 Approval, the organization shall quote the EASA Part 145 Approval Number and the ANAC RBAC 145 Approval Number in all cases.
- d) Procedures for approval for return to service should describe the procedures for the use of acceptable release documents for components and parts.

7.2 Return to Service for Components:

Note: This section may not be required. Check section 7.3 of this supplement example for information about ANAC direct acceptance of EASA and FAA maintenance release for components except complete engine and propeller.

- a) This section, if applicable, shall describe procedures for the release to service of components (example below), that meets the ANAC Special Conditions and the use of EASA Form 1 with a dual release.

b) Maintenance, alteration, and modification entries required by the Special Conditions (reference to approved/acceptable data) and the entries required by the operator's maintenance program shall be in the English language.

c) Use of EASA Form 1 with a dual release:

(i) For an EASA Form 1 issued as a dual release, both Statements in block 14a indicating compliance with Part 145.A.50 "Release to Service" from Regulation (EU) 1321/2014 Annex II, EASA Part 145 and "Other regulation specified in block 12" are checked. The AMO should include the following or equivalent language in block 12:

"The work identified in Block 11 and described herein has been accomplished in accordance with RBAC 43 and in respect to that work, the items are approved for return to service under approval no. [ANAC approval number]."

[Include copies of any attachments.]

(ii) In case on EASA Form 1 dual release NOT possible (one or more products/articles used accompanied by a Form containing only an ANAC or ANAC accepted release statement).

In block 14a, check only the box mentioning "Other regulation specified in block 13." Do not check box that states compliance to EASA 145.A.50. In block 13, the following text should be inserted:

"Certifies that the work specified in Block 11 was carried out in accordance with RBAC 43.9 and in respect to that work the component is considered ready for release to service under RBAC 145 approval no. _____.

This product/article meets EASA Part 145 requirements, except for the following items, and therefore is not eligible to be installed on EU-registered aircraft:"

(List the items)

(iii) The person approving the product for return to service shall sign block 14b of the form. This signature approves the component for return to service with respect to the work performed. The form must contain a description of the work performed, which also includes the following:

I) Maintenance manual reference and revision status;

II) The date of completion;

III) The name of the person who performed the service, if that person is different from the person specified in paragraph (iii) (IV) of this section;

IV) The name/signature of the person returning the component to service; and

V) The ANAC RBAC 145 maintenance organisation approval number; and

VI) Additional requirements specified by the operator (if any).

d) Other documents, such as work orders, shop travelers and ANAC Form F-400-04 (also referred as SEGVOO 001), may be used by the organisation to comply with the operator's requirements. If this is the case, these documents should be referenced specifically in block 12 and appropriately cross referenced.

e) Indicate that block 12 will reference the data used to perform maintenance (i.e., maintenance manual reference including revision status). The data referenced must meet the requirements of the Special Conditions. The referenced data may consist of an attachment to the form, such as a work order, air carrier record, etc.

f) Maintenance and alteration records required by the ANAC operation regulations, must be provided to the operator in English if requested.

7.3 ANAC Acceptance of Maintenance for Components except complete Engine and Propeller:

a) For the release of components other than complete engine and complete propellers, an AMO has two options:

(i) to issue an EASA Form 1 dual release under the ANAC approval, using the procedures described in item 7.2 above; or

(ii) to issue an EASA Form 1 single release under the EASA approval, from countries in Europe that are part of the EASA system, using the applicable MOE procedures, subject to acceptance of the Brazilian operators.

Note 1: According to RBAC 43.17(c)-I, the Brazilian operator shall verify:

- 1) In the case of major repairs or major alterations, that the work performed was based on the technical data considered approved by ANAC.
- 2) Compliance with other RBAC 43 requirements.

Note 2: ANAC also accepts (except for complete Engine and Propeller) under the same conditions described in Note 1 above:

- a) FAA Form 8130-3 single release from a Repair Station in United States.
- b) TCCA Form One single release from an AMO in Canada.
- c) CAA UK FORM 1 single release from AMO in United Kingdom.

Note 3: The list of countries that are part of the EASA system can be found at the following EASA website: [EASA By Country | EASA \(europa.eu\)](#)

7.4 Replacement Parts intended to be installed on Brazilian products:

Replacement Parts means parts that will be assembled on the Brazilian aircraft or parts to be installed there on. These parts usually come from a pool of parts, exchange of parts, and import of part. The part installed is different from the part removed.

Describe procedures regarding the acceptability of components authorized for use during maintenance, which should comply with the following requirement. Only the following new and used components may be fitted during maintenance.

a) New Components:

(i) New components should be traceable to the Original Equipment Manufacturer (OEM) as specified in the Type Certificate (TC) holders Parts Catalogue or other approved data and be in a satisfactory condition for installation. A release document issued by the OEM or Production Certificate (PC) holder should accompany the new component. The release document should clearly state that it is issued under the

approval of the relevant Authority under whose regulatory control the OEM or PC holder works.

(ii) For Brazilian OEMs and PC holders, release should be on the ANAC Form F-100-01 (also referred as Form SEGV00 003) as a new part.

(iii) For all EU Member States OEMs and PC holders, release should be in accordance with EASA Part 21.

(iv) Other ARCs from authorities with whom ANAC has a bilateral agreement on product certification. In the absence of agreement, the component may be imported following procedures established by ANAC.

Note: To access ANAC-Brazil bilateral agreements on Airworthiness Certification in place with other authorities, check the following website: <https://sistemas.anac.gov.br/certificacao/Acordos/AcordosE.asp>

(v) Standard parts are exempt from the foregoing provisions, except that such parts should be accompanied by a conformity statement and be in a satisfactory condition for installation.

(vi) Replacement parts are acceptable as detailed in Annex A of the Brazil/European Union Agreement and TIP.

Note: The term replacement part, as used in the TIP, assumes a general meaning of a part intended to be installed in the place of a part specified in the design of a civil aeronautical product.

(vii) New components provided by a Brazilian Air Operator shall have documentation in accordance with the Brazilian Air Operator's Continuous Airworthiness Maintenance Program (CAMP).

b) Used Components:

Used components should be traceable to maintenance organisations approved by the authority who certified the previous maintenance and/or in the case of life limited parts certified the life used. The used component should be in a satisfactory condition for installation and be eligible for installation as stated in the TC holders Parts Catalogue or other approved data. The following traceability documents are acceptable by ANAC for replacement parts to be installed on Brazilian products:

I) An EASA Form 1 issued, as a dual maintenance release (EASA+ANAC) from EU based RBAC 145 maintenance organisations.

II) Used components provided by a Brazilian Air Operator shall have documentation in accordance with the Brazilian Air Operator's CAMP.

III) A foreign form issued as a maintenance release that accompany used components from a foreign country territory based AMO, in accordance with an agreement between Brazil and that country.

Note: To access ANAC-Brazil bilateral agreements on Airworthiness Certification in place with other authorities, check the following website: <https://sistemas.anac.gov.br/certificacao/Acordos/AcordosE.asp>

IV) A maintenance release FORM from an AMO certificate/approved by a country that have a system for aeronautical maintenance considered equivalent by ANAC. For example, EASA Form 1, FAA 8130-3, TCCA Form One are acceptable for

replacement parts. The maintenance organisation responsible for the final Brazilian release must be certified (approved) by the ANAC.

c) Possible Cases:

Table 1 presents the possible cases for acceptance of parts and the necessary documentation:

Note: in case of questions about replacement of parts acceptable by Brazil, contact ANAC by using the e-mails indicated in Section A, Part V, of this MAG.

To be installed on Brazilian registered aircraft or parts to be installed on it				
Component coming from AMO or PAH located in:	Brazil	NEW	SEGV00 003 (F-100-01) NEW	
		USED (*)	SEGV00 003 (F-100-01) Single SEGV00 003 (F-100-01) DUAL [ANAC & EASA or ANAC & FAA or ANAC & TCCA or ANAC & CAA]	
	UK	NEW	CAA Form 1 NEW	
		USED	CAA Form 1 DUAL CAA & ANAC	CAA Form 1 SINGLE, or DUAL [CAA & any other] (**) or (***)
	EU	NEW	EASA Form 1 NEW	
		USED	EASA Form 1 DUAL [EASA & ANAC] (*)	EASA Form 1 SINGLE, or DUAL[EASA & any other] (**) or (***)
	US	NEW	FAA Form 8130-3 NEW	
		USED	FAA Form 8130-3 DUAL [FAA & ANAC] (*)	FAA Form 8130-3 SINGLE, or DUAL[FAA & any other] (**) or (***)
	Canada	NEW	TCCA Form One NEW	
		USED	TCCA Form One DUAL [TCCA & ANAC] (*)	TCCA Form One SINGLE, or DUAL[TCCA & any other] (**) or (***)
	Other third country	NEW	Other ARC from authorities with whom ANAC has a bilateral agreement on product certification or, in absence of an agreement, imported in a way acceptable by ANAC	
		USED	SEGV00 003 (F-100-01) Single (*)	Authorized Release Certificate from the country (***)
<p>(*) Direct Maintenance on Brazilian components under Brazilian RBAC 145 Certificate.</p> <p>(**) Direct Maintenance in accordance with RBAC 43.17. Currently ANAC accepts direct maintenance in components (NOT complete engine and propeller) from AMO EASA certified in EU, AMO FAA certified in USA, from AMO TCCA certified in Canada and AMO certified in UK that follows the CAA system.</p> <p>(***) Replacement/Spare parts (used parts from Pool, Exchange, Import). ANAC accepts the authorized release certificate (ARC) from countries with whom ANAC has a bilateral agreement addressing import/export of parts. In the absence of an agreement, the component may be installed following the procedures established by ANAC.</p>				

Table 1: Necessary documentation for replacement parts.

8 REPORTING OF FAILURES, MALFUNCTIONS OR DEFECTS AND SUSPECTED UNAPPROVED PARTS (SUP) TO ANAC

8.1 Procedures: Explain the procedures that the organisation will use to ensure that reports are sent to ANAC, type certificate holder, supplementary type certificate holder, or the holder of a Brazilian Attestation of Approved Aeronautical Product (Brazilian equivalent to PMA) when serious defects are found in Brazilian registered aircraft or components received from a Brazilian customer. Submit this information, in English, in accordance with the timeframe specified in EASA Part 145 using the email pac@anac.gov.br. A copy of this report should be sent to the customer.

8.2 Report content: The report should contain the following information:

- a) nationality and registration marks of the aircraft
- b) type, manufacturer, model and serial number or batch of the article
- c) date of the event identification
- d) the nature of the event
- e) time since last overhaul, if applicable
- f) Apparent cause of the event
- g) Other pertinent information necessary for complete determination of severity or corrective action required.

8.3 Responsibility: Include the title of each person responsible for completing and submitting reports of unairworthy conditions to the ANAC.

8.4 Suspected Unapproved Parts Program (SUP) Reporting Requirements: The SUP reporting requirements section should:

- a) Describe the organisation's procedures to report all SUPs.
- b) This section should include the title of each person responsible for completing and submitting suspected unapproved parts notifications to the ANAC.
- c) EASA Part 145 requirements include SUP reporting requirements under their unairworthy conditions reporting requirements. The ANAC recognizes this system; therefore, an AMO need only to identify the appropriate section by reference in this supplement, provided the procedures are in English and can be made available to the ANAC upon request. A duplicate copy of the form submitted to the NAA must be submitted in English to the ANAC. EASA Part-145.A.60 meets the intent of the SUP program when a copy of the report is forwarded to the ANAC in English.
- d) The report should be sent to the email pac@anac.gov.br.

9 ADDITIONAL OPERATING LOCATIONS INCLUDING LINE STATIONS

9.1 Additional Fixed Locations within EU Member States: If the AMO has additional fixed locations, located in the EU Member States operating under one NAA approval, the sites can operate under one ANAC approval. This section of the supplement must address the procedures the AMO will use to ensure each location

operates under the same MOE and ANAC Supplement as the main facility. The procedure must demonstrate how each separate location is under the full control and QS of the main facility. The additional fixed locations must be located within an EU Member States.

9.2 Line Stations: If the AMO has line stations, this section of the supplement must address the procedures the AMO will use to ensure each line station operates under the same MOE and ANAC supplement as the main facility. The procedure must demonstrate how each line station is under the full control of the main facility and QS. The ANAC supplement must contain a list of line stations that maintain Brazilian or foreign registered aeronautical products operated under the provisions of Brazilian regulations.

Note: Line stations located in each other's territory are not accepted under the Agreement i.e. the organization cannot exercise the privileges received under the Agreement in the territory of the other party.

10 WORK AWAY FROM A FIXED LOCATION

10.1 This Section describes the procedures for conducting work away from the maintenance organisation to ensure compliance with the Agreement. The Section should also state that the maintenance organisation is authorized to perform work away from its facilities as specified in this Section but the performance of such work must not exceed the scope approved to ANAC (not exceed EASA rating).

10.2 The procedures should address how a maintenance organisation will perform work at a place other than its fixed location when the occasion or the need arises, by moving, material, equipment, and technical personnel to perform specific maintenance functions. This process cannot be used to establish a permanent location. Continuous operation at a permanent facility other than the maintenance organisation's fixed location must not occur without the appropriate approval.

10.3 If the maintenance organisation manual does not have a written procedure for work away from station, then the maintenance organisation must notify the ANAC and NAA in advance of doing the work. The notification must describe the work to be performed, the date of the work, the customer, and certify to the ANAC and NAA that the maintenance organisation will follow all existing procedures in their current MOE and ANAC supplement.

Note: A maintenance organisation may perform work away from its fixed location on a recurring basis when necessary, such as to perform mobile field services. This will allow work away from the maintenance organisation's fixed location as a part of everyday business rather than under special circumstances only. Once the NAA accepts procedures in the ANAC supplement to the MOE allowing the work away from fixed location, this eliminates the requirement for notifying the ANAC in advance.

10.4 This subsection should also describe how work will be accomplished in the same manner as work performed at the maintenance organisation's fixed location. The maintenance organisation should acknowledge that these procedures apply only to work performed at other locations.

10.5 The AMO should make reference to the applicable MOE procedures describing work away from a fixed location, provided they are in English language, or include the following in the ANAC Supplement:

- a) Describe the procedures used to ensure that ANAC technical data, such as manufacturers' manuals, service bulletins, and letters, are current and accessible at the location where the work is performed.
- b) Describe the procedures used by the organisation to control tools and ensure proper equipment calibration when away from the maintenance organisation's fixed location.
- c) Describe how the organisation will ensure that records for work performed away from the maintenance organisation will be maintained in the same manner as at the maintenance organisation 's fixed location.
- d) Describe how the organisation will ensure that personnel performing work away from the maintenance organisation's fixed location will be trained and qualified to perform the required work.
- e) List by title the persons who are authorized to approve an item for return to service when working away from the maintenance organisation's fixed location.
- f) List by title the persons responsible for organizing and supervising work away from the maintenance organisation's fixed location.
- g) Describe how the organisation will ensure that all required personnel, equipment, materials, and parts will be made available at the place where the work is to be performed.
- h) State the organisation's responsibility to maintain a record of work performed away from the maintenance organisation, both within the country and outside the country. Any record of this work should include:
 - I) A description of the work performed;
 - II) The date and location where the work was performed; and
 - III) The work order number (total time in service if required).
- (ii) Retain these records for 5 years after the performance of the work.
- i) If required to perform maintenance on a Brazilian registered aircraft or a component of such aircraft located within the territory of the Federative Republic of Brazil and operated under the RBACs, the AMO must request ANAC approval before performing the work. ANAC will evaluate each request on a case by case basis. The NAA should be informed by the AMO about the outcome of the ANAC evaluation.

11 CONTRACTING / SUBCONTRACTING

11.1 An ANAC RBAC 145 approved maintenance organisation may subcontract a maintenance function pertaining to a component to an outside source. (Contracting is different from subcontracting. For the purposes of this section, the term subcontracting does not include contracting).

11.2 Contracted maintenance service will be under approval for return to service of another ANAC approved contracted AMO.

11.3 Subcontracted maintenance service will be returned to service under the approval of the ANAC approved AMO.

11.4 There are two elements to the subcontracting provisions to be included in the Supplement:

a) List of Subcontractors:

ANAC accepts EASA Part 145 requirements for the MOE to contain a list of all subcontractors utilized by the AMO and approved by the NAA as part of the MOE. The list contains the name, address, and certificate and rating if applicable. ANAC can accept this practice when the list identifies, by an asterisk or other means of identification, those subcontractor(s) the AMO will use to support maintenance activities for Brazilian registered aircraft or aeronautical products to be installed on such aircraft. Make the list of subcontractor(s) available to the ANAC in the English language on request.

b) Qualifying and Auditing Subcontractor

(i) ANAC recognizes EASA Part 145 QS and requirements to qualify and audit subcontractors when the QS includes the ANAC Special Conditions. If the AMO's summary of its quality and audit procedures includes a description of inclusion of the ANAC Special Conditions, there is no need to provide additional supplement procedures. However, If the AMO elects to have a separate QS for the ANAC special condition the following procedures should be addressed in the supplement:

I) Describe those procedures the organisation will use to both qualify and audit subcontractors.

II) Subcontracting to non ANAC Approved Sources. If the AMO subcontracts a function to a non ANAC approved source, the AMO must be appropriately rated to perform the work. This section should:

a. Explain that the AMO is responsible for approving for return to service each item on which work is performed and for ensuring its airworthiness.

b. Indicate that any non ANAC approved subcontractor to which work is subcontracted must be under the control of the AMO's QAS. Additionally, the AMO must inspect each item on which subcontracted work has been performed for compliance with this supplement.

c. Explain that if the AMO cannot determine the quality of subcontracted work, the work can only be subcontracted to an ANAC certificated facility that is able to test and/or inspect the work performed and issue a return to service for the work performed.

III) Contracting to ANAC Approved AMO. This subsection should:

a. Explain that, if the AMO contracts functions to another organisation that is ANAC approved, the contractor is responsible for approving the return to service for each item on which it has worked and the AMO is responsible for approving the return to service the major assembly or aircraft, which this item is part of.

b. Describe the procedures the organisation will use to determine that the ANAC approved organisation, to which the work is contracted, is properly approved to perform that work.

IV) Receiving Inspections. This subsection should:

- a. Describe the organisation's procedures for inspecting the work performed by a subcontractor on an item that has been returned to service.
- b. Describe the procedures the organisation uses to provide technical training for receiving inspection personnel who inspect subcontracted work.
- c. Explain the procedures the organisation will use to ensure that items on which subcontracted work has been performed are properly processed through the organisation's receiving inspection procedures.
- d. Explain receiving inspection procedures in enough detail to enable a receiving inspector to make an airworthiness determination of any item received based on a technical review of the subcontractor's source documentation.
- e. Describe the method of recording subcontractor's work and the record retention period.

V) Audits. This subsection should:

- a. Describe the procedures the organisation uses when auditing subcontractors and the frequency of such audits. It also should explain the procedures for recording the results of such audits, to include the record retention period for the results of each audit.
- b. Describe the procedures the organisation will use to ensure that subcontractors comply with operators' manuals, manufacturers' manuals, and ICA.
- c. Describe how subcontractors are informed of any change to these manuals and procedures.

12 MAJOR REPAIRS AND MAJOR ALTERATIONS

12.1 Automatically Approved Data:

All repair design data are considered ANAC approved data when approved by EASA and/or organisations/persons approved under EASA Part 21 for use on aircraft and related components where EASA is the primary authority responsible for design approval. This does also apply to repair design data developed by organisations/persons that are the type certificate (TC) / supplemental type certificate (STC) holder and other civil aviation authorities (CAA) that are the primary authority responsible for design approval of the aeronautical product. In all cases, the customer is responsible for confirmation of data approval. Details for the acceptance and/or validation of EASA-approved changes to the type design by ANAC are contained in Annex A to the Agreement and in the associated Technical Implementation Procedures for Airworthiness and Environmental Certification (TIP).

12.2 Procedures for data that is not automatically approved:

- a) For repair design data that is not automatically approved the AMO needs to describe the procedures to ensure that the major repair and/or alteration/modification data being used to perform work on a Brazilian customer's product is approved by the ANAC. The following should be described:
 - (i) Procedures the organisation will use to determine when ANAC approved data are required (procedures for determining what is a major repair or a major alteration as detailed in RBAC 43 Appendix A).

(ii) Procedures for obtaining ANAC approved data for major repairs and/or major alterations; and

b) Include procedures the organisation will follow to ensure that an English version of ANAC F-400-04 (Also referred as Form SEGVOO 001) is provided directly to the ANAC to obtain an approval of major repair/modification via “field 3”, when required.

c) Include the title of each person responsible for completing and submitting ANAC F-400-04 (Also referred as Form SEGVOO 001) to the ANAC.

12.3 Recording of major repair and alteration

a) Describe forms used for recording major repairs and/or major alterations (i.e., ANAC Form F-400-04 also referred as Form SEGVOO 001, customer's work order, or any records required by an air carrier). The operator shall provide instructions to complete the required forms, as necessary.

13 COMPLIANCE WITH BRAZILIAN AIR CARRIER'S CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM (CAMP)

13.1 Procedures:

a) Describe that the organisation will comply with appropriate portions of a Brazilian RBAC 121 or 135 certified air carrier's Continuous Airworthiness Maintenance Program (CAMP) as provided by the operator, manufacturers' manuals, ICA, and the Brazilian operator's instructions to the organisation; and

b) Describe the procedures the AMO uses to ensure that its personnel have been properly trained and qualified to perform work in accordance with air carrier requirements.

c) State that the AMO understands that any deviation from these manuals or instructions will require documented approval from the air carrier.

d) The AMO's maintenance procedures that are different from the air carrier's CAMP procedure shall be identified in a written agreement.

Note: Under RBAC 145, § 145.205, the AMO is required to comply with the air carrier's CAMP. This requires the AMO to comply with the air carrier's requirements; for example, approval for return to service procedures, parts, tagging, shelf life of expendable materials, tool and equipment calibration intervals, etc., in accordance with the air carrier's CAMP. This is normally accomplished by the air carrier auditing the AMO and providing the AMO with a written agreement accepting the AMO's processes and procedures as meeting or exceeding the air carrier's requirements. It is imperative that the AMO receive and retain copies of the written agreement from the air carrier and have it available for review by the NAA or ANAC.

e) If applicable, describe the aircraft inspection requirements for Brazilian registered aircraft operating under RBAC 91 § 91.409 aircraft inspection requirements. This section should describe how the AMO will meet the operator's requirements. (The AMO should

request the operator to provide them with the appropriate section of the inspection program).

13.2 Required Inspection Items (RII):

- a) State that the inspection of RIIs identified in the RBAC 121 or RBAC 135 Operator's Manual must be accomplished by authorized personnel who are not involved in performing the work on the item to be inspected.
- b) The RII-qualified inspectors must work under the quality control system/inspection of the maintenance organisation.
- c) Under this subsection of the manual, the maintenance organisation will state how the separation between maintenance and inspection is managed.
- d) State that the maintenance department from the AMO or from the air carrier cannot overrule the findings of the RII-qualified inspector.
- e) Include the organisation's procedures to ensure that any person performing RIIs inspection is trained, qualified, and authorized by the air carrier for which the RII inspection is being conducted.

14 COMPLIANCE WITH MANUFACTURERS' MAINTENANCE MANUALS OR INSTRUCTIONS FOR CONTINUED AIRWORTHINESS (ICA)

14.1 Compliance with manufacturers' maintenance manuals or ICA section will:

- a) Describe how the organisation will comply with manufacturers' maintenance manuals or ICA.
- b) Include procedures that the organisation will use when an air carrier's manual deviates from the procedures specified in the corresponding manufacturer's manual.
- c) If an air carrier deviates from the procedures specified in the corresponding manufacturer's manual, it is the air carrier's obligation to acquire prior ANAC approval for that deviation.
- d) State that the AMO will retain an English language copy of the technical data from which the AMO's internal documents were developed. However, the AMO may convert technical data (i.e., ICA, manufacturers' maintenance manuals, or type certificate holders' continued airworthiness data) into internal documents such as work cards, work sheets, and shop travelers in a language other than English. The AMO also will establish procedures to ensure that its English language copy of technical data and any internal documents developed from this technical data are current and complete. Keep an English copy of the technical data at the AMO's main base as identified on the ANAC certificate and make it available to the ANAC on sampling inspections or investigation.
- e) State that all maintenance performed for a Brazilian air carrier, including all major repairs and major alterations, must be recorded in accordance with that air carrier's manual. Major repairs performed for a Brazilian air carrier must be recorded on ANAC F-400-04 (Also referred as Form SEGV00 001), or on a work order signed and dated by the maintenance organisation. Major alterations performed for anyone other than a Brazilian air carrier, (i.e., Brazilian registered general aviation aircraft) must be recorded on an ANAC F-400-04 (Also referred as Form SEGV00 001). EASA part 145 requires the AMO

to follow the operators' work orders and manuals; therefore, a reference to the section of the manual that addresses this issue is acceptable, provided that section is written in English and can be made available to the ANAC upon request. However, any deviation from procedures as stated above in Section 13 must be addressed in this section to show compliance with ANAC approved data.

15 ANAC AIRWORTHINESS DIRECTIVES (AD)

15.1 Explain how the organisation will ensure access to all ANAC ADs, applicable to the work being performed under the ratings it holds.

15.2 State how the organisation will manage and control the distribution and use of ADs. It also should identify how the organisation will ensure that the applicable ANAC ADs will be made available to its personnel when they perform work under its ANAC certificate and rating.

15.3 Include maintenance organisation's procedures to ensure customer approval/request to perform applicable ADs. If the organisation does not comply with an applicable AD, record its non-compliance in the item's maintenance records. This section should describe how this information would be recorded and transmitted to the customer.

Note: Any applicable Brazilian airworthiness directives can be verified at <https://sistemas.anac.gov.br/certificacao/DA/DAE.asp>. Additionally, ADs issued by the civil aviation authority of the state responsible for type design of the product being maintained are also applicable.

16 QUALIFICATIONS OF PERSONNEL

16.1 The personnel requirements section will include the following:

- a) The name, title, telephone number, and e-mail of the person who will act as the liaison between the organisation and the NAA. This liaison will ensure compliance with the provisions of the supplement.
- b) The procedures the organisation uses to ensure that its personnel have been properly trained and qualified to perform work in accordance with the customer or air carrier requirements (procedures such as RII). It is the responsibility of the maintenance organisation to assure that these requirements are met.
- c) The procedures the organisation uses to ensure that its personnel working on Brazilian registered aircraft or components to be release under the Brazilian regulation have received the required supplement training before starting the work.

17 CAPABILITY TO COMPREHEND THE PORTUGUESE LANGUAGE

17.1 This section shall include procedures for the maintenance organization to guarantee it will have capability to clearly comprehend the technical information and documents whenever they are presented in the Portuguese language. Such documents

may include: Brazilian regulations, maintenance records, aircraft placards, forms, among others.

17.2 The organization shall ensure that it achieves the expected capability to comprehend the technical documents presented in Portuguese. For example, the organization may:

- a) Hire a person who will be part of the organization's technical staff; or
- b) Contract an external consultant; or
- c) Interact with the customer involved to obtain adequate comprehension.

18 RECORD KEEPING

18.1 Procedures to maintain, at least for 5 (five) years, each Work Order with all attached supplementary forms and part certifications.

18.2 A copy of each work order with all attached supplementary forms and parts certification shall be maintained in the technical records office of the AMO for a period of at least 5 (five) years in accordance with the applicable regulations of the ANAC (RBAC 145.219).

19 AIRWORTHINESS VERIFICATION CERTIFICATE - CVA (FORMER ANNUAL MAINTENANCE INSPECTION - IAM)

Note: As per the Brazilian Regulation RBAC n° 91, which replaced the former RBHA 91, Annual Maintenance Inspection – IAM was replaced by the performance of evaluations for the issuance of the Airworthiness Verification Certificate – CVA.

19.1 This section only applies in those cases where the AMO is willing to, and capable of, performing the activities to issue the Airworthiness Verification Certificate – CVA (former IAM).

19.2 To issue the CVA for a Brazilian registered aircraft, it is required that the AMO has the aircraft type/model in the scope of approval and procedures in the supplement to perform the airworthiness verification. When an AMO does not maintain aircraft (AMO without airframe rating), this section should specify "Not applicable".

19.3 According to RBAC 91, section 91.403, the airworthiness verification and the respective issuance of the CVA must be performed:

- a) every 3 years, for aircraft operating in accordance with RBAC 121 or RBAC 135 engaged in scheduled transportation; and
- b) annually for the aircraft operating under the remaining operational regulation.

19.4 To address customer's requests for the AMO to perform the airworthiness verification and issue the CVA for an aircraft, the organization shall develop procedures to evaluate the following:

- a) All required documentation for the aircraft is in accordance with RBAC 91, sections 91.203 and 91.417, including the updated information of the owner/operator in the Brazilian Aeronautical Registry;

- b) The aircraft is in accordance with Brazilian type certificate as well as with Supplementary Type Certificate - STC incorporated in the aircraft, if any;
- c) All major repairs and major alterations were performed in accordance with approved technical data;
- d) All applicable Brazilian Airworthiness Directives were verified and/or accomplished;
- e) The aircraft complies with the inspections from a maintenance program as established in Subpart "E" from RBAC 91;
- f) The accomplishment of the last required scheduled maintenance tasks or inspections were performed and the aircraft was approved for return to service by authorised persons as prescribed by sections 43.3 and 43.7 of RBAC 43, respectively;
- g) All discrepancies found for the aircraft were rectified or appropriately deferred;
- h) The aircraft is marked and identified as required by regulation RBAC 45, including its engines, propellers and critical components;
- i) There are records available proving the total flight hours of the airframe, engines, propellers and rotors, as well as the total cycles, landings or other parameters required to determine the airworthiness condition of the airframe, engines, propellers, rotors or critical components, as applicable;
- j) The aircraft has a flight manual or aircraft operation manual (AOM), for aircraft in which a flight manual is required;
- k) The aircraft was weighed and had its weight and balance report updated and recalculated as required; and
- l) The aircraft complies with all the requirements present in the operational rules applicable to the type of authorized operation, related to technical or documentary aspects of the aircraft.

19.5 In order to carry out the Airworthiness Verification, the procedures in the Supplement shall guarantee the AMO will have access to the necessary aircraft maintenance records, including logbooks from airframe, engine and propellers (if applicable), overhaul forms, authorized release certificates, primary records for compliance of airworthiness directives, among others. During the Airworthiness Verification, fill the form "Airworthiness Verification Certificate" as a guide for the evaluations that shall be performed.

Note: Form "Airworthiness Verification Certificate" (Form F-145-27) is available at ANAC website: <http://www2.anac.gov.br/certificacao/Form/Form.asp>

19.6 After the airworthiness verification is completed, the CVA form filled, dated and signed shall be sent to ANAC Foreign 145 Group either by e-mail or physically. One copy shall be delivered to the operator and another copy retained by the AMO for 5 years.

19.7 In the event of any verification indicating that the aircraft is not in airworthy condition, a list of discrepancies must be submitted to the aircraft owner or operator.

19.8 In case the operator has not authorized or provided for its correction, a CVA marked "Non-Airworthy" ("CVA Não aeronavegável") shall be sent to ANAC.

19.9 In the aircraft, engine and propeller logbooks, insert, date and sign the CVA stamp (“Etiqueta CVA” - Form F-145-28), available in the ANAC website: <http://www2.anac.gov.br/certificacao/Form/Form.asp>

19.10 The ANAC Supplementary Instruction IS n° 91.403-001 provides the guidance and the procedures for carrying out the Airworthiness Verification and issuing the Airworthiness Verification Certificate (CVA).

Note: IS n° 91.403-001 is available only in Portuguese in the ANAC website <https://www.anac.gov.br/assuntos/legislacao/legislacao-1/iac-e-is/is>

20 FORMS

20.1 The forms section may include copies, or the way to access them, of all forms referred to in the supplement, (e.g. ANAC F-100-01 (Also referred as Form SEGVOO 003), ANAC F-400-04 (Also referred as Form SEGVOO 001)), procedures for completing the forms, and the title of any person authorized to execute such forms. It is acceptable to refer to other sections of the supplement or to other English language sections of the manual where the copies and procedures for completing the forms are located and can be provided to the ANAC upon request.

Appendix 3: Approval Letter Template

Place of issue, MM-DD-YYYY

Subject: EU / Brazil Agreement - ANAC Approval Letter

Dear Sir or Madam,

1. Considering the maintenance procedures covered by Annex B to the Agreement between European Union (EU) and the Federative Republic of Brazil on Civil Aviation Safety and MAG (Maintenance Annex Guidance), this is to inform you that [Organisation Name], [EASA approval number], ANAC Supplement [revision xx], dated [__/__/____] is hereby approved by [NAA].
2. The ANAC RBAC 145 approval reference is:

[Organisation Name]

ANAC RBAC 145 Approval Reference number: XXXX

Valid until: [--/--/----]

3. This supplement approval allows performing maintenance services on Brazilian registered aircraft and components intended to be installed thereon subject to compliance with EASA Part-145 requirements and the ANAC special conditions as detailed in the Agreement Annex B Appendix B1 and the Maintenance Annex Guidance (MAG).
4. Please be reminded that the ANAC scope of ratings and limitations must not exceed the ones specified in your Part 145 approval certificate.
5. You are reminded that you will be required to submit your next application for renewal 60 days prior to the expiration date indicated in paragraph 2 of this letter in accordance with MAG Section C which is available on the EASA web site at: <http://www.easa.europa.eu/document-library/bilateral-agreements/eu-brazil>.

Best Regards,

[NAME of NAA Responsible]
Position of NAA Responsible