

**NOTICE OF PROPOSED AMENDMENT (NPA) No 07/2005**

**DRAFT OPINION OF THE EUROPEAN AVIATION SAFETY AGENCY,**

**for a Commission Regulation amending Commission Regulation (EC) No 2042/2003, on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks**

***PART-M AMENDMENT FOLLOWING REGULATORY IMPACT ASSESSMENT***

## TABLE OF CONTENTS

		Page
A	EXPLANATORY NOTE	3
I	General	3
II	Consultation	3
III	Comment Response Document	4
IV	Content of the draft opinion	4
	A) The regulatory impact assessment	4
	B) The envisaged changes	5
	C) The rejected changes	8
V	Regulatory Impact Assessment	10
B	DRAFT OPINION	11
I	Proposal for a Commission Regulation, amending Commission Regulation (EC) No 2042/2003	11
	APPENDICES	
I	CRD Part-M issues for larger operators	
II	Air EuroSafe Final Report “Regulatory Impact Assessment of Annex 1 (part-M) to Regulation (EC) No 2042/2003 2004/S 122-102598”	

## **A. EXPLANATORY NOTE**

### **I. General**

1. The purpose of this Notice of Proposed Amendment (NPA) is to propose an amendment to Annex I Part-M to Commission Regulation (EC) 2042/2003.<sup>1</sup> The reasons for this rulemaking activity are outlined further below.
2. The Agency is directly involved in the rule-shaping process. It assists the Commission in its executive tasks by preparing draft regulations, and amendments thereof, for the implementation of the Basic Regulation<sup>2</sup>, which are adopted as "Opinions" (Article 14.1). The Agency also adopts acceptable means of compliance and guidance material to be used in the certification process (Article 14.2).
3. The text of this NPA is developed by the Agency. It is submitted for consultation of all interested parties in accordance with Article 43 of the Basic Regulation and Articles 5(3) and 6 of the EASA rulemaking procedure.<sup>3</sup>
4. This rulemaking activity is included in the Agency's rulemaking programme for 2005. It implements the rulemaking task M.007 (Rule) Rule amendment following impact assessment.

### **II. Consultation**

5. To achieve optimal consultation, the Agency is publishing the draft opinion on its internet site. Comments should be provided within 3 months in accordance with Article 6 para 4 of the EASA rulemaking procedure.  
Comments on this proposal may be forwarded (*preferably by e-mail*), using the attached comment form, to:

**By e-mail:** **NPA@easa.eu.int**

**By correspondence:** Inge van Opzeeland  
Rulemaking Directorate  
EASA  
Postfach 10 12 53  
D-50452 Köln  
Germany  
Fax: +49(221) 89990 5508

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<sup>1</sup> OJ L 315, 28.11.2003, p. 1.

<sup>2</sup> OJ L 240, 7.9.2002, p. 1.

<sup>3</sup> Decision of the Management Board concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material ("rulemaking procedure"), EASA MB/7/03, 27.6.2003.

Comments should be received by the Agency **before 24-09-2005**. If received after this deadline they might not be treated. Comments may not be considered if the form provided for this purpose is not used.

### **III. Comment response document**

6. All comments received in time will be responded to and incorporated in a Comment Response Document (CRD). This may contain a list of all persons and/or organisations that have provided comments. The CRD will be widely available ultimately before the Agency adopts its final decision.

### **IV. Content of the draft opinion**

#### **A) The regulatory impact assessment**

7. Article 7 (6) of Commission Regulation (EC) No 2042/2003 requires the Agency to make an evaluation of the implication of the provisions of Part-M. The Agency organised therefore two meetings with commercial and non-commercial industry representatives to define the scope of the related regulatory impact assessment. The Agency decided to concentrate its attention on the impact on non-commercial activities as the impact on commercial air transport is only minor. Attached to this NPA is a Comment Response Document (CRD) answering various points made by several commercial air transport operators.
8. After further consideration the Agency also concluded that only Subparts E (Components), F (Maintenance organisation), G (Continuing Airworthiness Management Organisation), H (Certificate of Release to Service – CRS) and I (Airworthiness Review Certificate) had to be assessed. Within these subparts every paragraph had to be addressed from a safety, economic and social standpoint. This was therefore the scope of the RIA.
9. The regulatory impact assessment could not be carried out by the Agency due to time and resource constraints. After a public procurement procedure a professional consultant was selected to carry out the task. It started the assessment by sending out initial questionnaires to all 25 Member States to collect general data about the national regulations. The answers received made it possible to select six Member States (France, Germany, Italy, Sweden, Poland and the United Kingdom) representing the majority of non-commercial activities and the whole range of the different regulatory systems and traditions in Europe. After this selection the impacted elements were identified to elaborate a second more detailed questionnaire for use in a discussion forum with associations representing aero-clubs, light aircraft pilot and owners and various categories of workers. This was to gather all of their comments together with supporting data to enable an assessment of the impact Part-M will have on each section of non-commercial aviation. Lastly, it was dealt with the evaluation of differences; in this stage Part-M was compared to FAR 43. The final report as accepted by the Agency is attached to this NPA so as to provide for full transparency, as appendix 2.

10. When considering this report, the Agency agrees that several changes would improve the acceptance of the regulation, while maintaining an acceptable level of safety. Such changes would indeed reflect the current situation and avoid additional burden without proven additional safety benefits. It however cannot follow some suggestions made by the consultant because they would not bring improvement to the current text or could adversely affect the level of safety, which Part M is currently aiming at. This NPA presents therefore the changes envisaged by the Agency and explains why it intends to reject some others. In each case it is made reference to the related sections of the consultant's final report "Regulatory Impact Assessment of Annex 1 (Part-M) to Regulation (EC) No 2042/2003 2004/S 122-102598".
11. It should be emphasised that rulemaking task M.007 encompasses only changes to the Part-M regulation itself. AMC and Guidance material will be subject to further review when carrying out rulemaking task M.017 "AMC/GM amendment following impact assessment". Current planning foresees a group to start work in 4<sup>th</sup> quarter 2006, as the affected elements of Part-M only enter into force in September 2008.

**B) The envisaged changes.**

**a) M.A.607 Certifying staff  
paragraph (b)**

12. The recommendations that brought about this change can be found on
  - Pages 2 and 3 of Appendix I (vi) "Summary of Recommendations",
  - Pages 22-25 of Appendix I "Consolidated Comments Report".

Paragraph M.A.607(b) deals with aircraft on ground at locations where no appropriate certifying staff is available and caters for one-off authorisations in such cases. The paragraph is seen as too onerous for small operators as it is in their view adapted to a Part-145 environment. It is feared that the personnel requirements would raise costs for owners/operators.

The consultant proposes to modify paragraph M.A.607(b). The Agency wonders whether this change is necessary as another change it proposes to paragraph M.A.801(c) goes further and renders this one obsolete. It is therefore envisaged to delete paragraph M.A.607(b) and to replace it by paragraph M.A.801(c). It should be noted that by operating this transfer, the control of the competence of the person signing the CRS in exceptional cases rests with the owner of the aircraft and no longer with the Subpart F maintenance organisation. The following paragraph (c) in M.A.607 should be renumbered accordingly.

**b) M.A.712 Quality system  
paragraph (f)**

13. The recommendations that brought about this change can be found on

- Page 6 of Appendix I (vi) “Summary of Recommendations”,
- Pages 66-68 of Appendix I “Consolidated Comments Report”.

Paragraph M.A.712 encompasses provisions for the quality system of continuing airworthiness management organisations. Paragraph (f) states that small Subpart G organisations, which do not have the privilege to issue airworthiness review certificates, may replace the quality system by regular organisational reviews. This paragraph is seen as too onerous in respect to aircraft below 2730 kg. If a Subpart G organisation can satisfactorily manage the continuing airworthiness without the need of a formal quality system then it should be equally satisfactory to conduct airworthiness reviews for the less complex general aviation aircraft without such a system.

The consultant proposes to change paragraph M.A.712 (f) to allow for a relief from the requirement to have a complete quality system for Subpart G organisations, provided that the "M.A.703 extent of approval does not include aircraft used for commercial air transport or aircraft above 2730kg MTOW or multi-engine helicopters". The Agency intends to follow this proposal.

**c) M.A.801 Aircraft certificate of release to service**

14. The recommendations that brought about this change can be found on

- Page 7 of Appendix I (vi) “Summary of Recommendations”,
- Pages 74-77 of Appendix I “Consolidated Comments Report”.

Paragraph M.A.801 caters for the certificate of release to service within the non-commercial aviation environment. In its report the consultant indicates that the case of aircraft on ground at locations where no appropriate certifying staff is available, should be also addressed and that one-off authorisations should apply not only to Subpart F maintenance organisations but also to the pilot/owner of the aircraft. It proposes therefore to insert a paragraph similar to the provisions in M.A.607(b) allowing the owner to decide on the one time authorisation.

As described in paragraph a) M.A.607 above, this proposal goes much further than the one on paragraph M.A.607 and renders it obsolete. The Agency considers therefore more appropriate merging both proposals and to modify M.A.801(c). This amendment would simplify the text while maintaining a satisfactory level of safety. Furthermore, it allows for sufficient flexibility. The following paragraphs should be renumbered accordingly.

**d) M.A.803 Pilot-owner authorisation and  
Appendix VIII Limited Pilot Owner Maintenance**

15. The recommendations that brought about this change can be found on

- Pages 8-9 and 12-18 of Appendix I (vi) “Summary of Recommendations”,
- Pages 79-81 and 104-107 of Appendix I “Consolidated Comments Report”.

Paragraph M.A.803 and Appendix VIII encompass provisions for limited pilot owner maintenance and for issuance of a CRS. The Appendix is found too limitative. It is furthermore proposed re-evaluating the applicability of each task in Appendix VIII to gliders, balloons, airships and light aircraft.

The Agency agrees with such envisaged change so as to enable the Member States not wishing to opt-out until September 2008 to implement Part-M with a more adapted list of pilot owner maintenance. Nonetheless, it has to be emphasised that paragraph M.A.803 and Appendix VIII are subject to further re-evaluation within the rulemaking task M.005.

**e) M.A.901 Aircraft airworthiness review paragraph (e)**

16. The recommendations that brought about this change can be found on
- Pages 9-11 of Appendix I (vi) “Summary of Recommendations”,
  - Pages 82-86 of Appendix I “Consolidated Comments Report”.

Paragraph M.A.901 provides for the aircraft airworthiness review. Para (e) defines the accomplishment of airworthiness reviews by the competent authority in the case of a potential safety threat. Some authorities expressed concerns that problems may arise during a transitional period due to the limited number of approved Subpart G organisations, i.e. absence of Subpart G organisations for certain aircraft in certain areas. This could lead to blocking the system.

The consultant therefore proposes to clarify when a competent authority may carry out an airworthiness review and issue the airworthiness review certificate directly. The Agency can accept this suggestion, which is reflected by a change that provides for direct NAA’s intervention in the absence of a continuing airworthiness management organisation approved for a certain aircraft type.

**f) Appendix I Continuing Airworthiness Arrangement**

17. The recommendations that brought about this change can be found on
- Page 11 of Appendix I (vi) “Summary of Recommendations”,
  - Pages 70-71 and 102-103 of Appendix I “Consolidated Comments Report”.

Appendix I outlines the obligations of the contracting parties when an owner contracts a Subpart G organisation. It is feared that a Subpart G organisation may not be informed of the aircraft flying hours.

The consultant proposes therefore adding to the obligations of the owner that he has to inform the contracted approved organisation of the aircraft flying

hours. Furthermore, editorial changes are suggested. The Agency concurs with these conclusions.

**g) Appendix II EASA Form 1  
block 13 and 19 completion instructions**

18. The recommendations that brought about this change can be found on
- Pages 3 and 4 of Appendix I (vi) “Summary of Recommendations”,
  - Pages 32-34 of Appendix I “Consolidated Comments Report”.

EASA Form 1 is the certificate of release to service (CRS). It is feared that such a form does not allow clearly differentiating non-commercial activities from the commercial ones. As a consequence parts could be fitted on aircraft involved in commercial air transport, while not approved for such use..

The consultant proposes to modify Appendix II EASA Form 1 in order to adapt the instructions for filling in blocks 13 and 19.

- Block 13 - Replace “M.A. Subpart F approval reference” by “Part-M Certificate of release to service”.
- Block 19 – The current text should be replaced by: “For all maintenance by M.A. Subpart F approved maintenance organisations the box “other regulation box specified in block 13” shall be ticked and the certificate of release statement made in block 13.”

**C) The rejected changes**

**a) M.A.707 Airworthiness review staff**

19. The recommendations can be found on
- Pages 4 and 5 of Appendix I (vi) “Summary of Recommendations”,
  - Pages 54-57 of Appendix I “Consolidated Comments Report”.

It is proposed to add a new paragraph (b) for balloons and gliders as it is felt that the existing experience, qualification and training requirements of the responsible persons is to onerous. However, the proposal made does not show much difference with the existing text and the Agency does not consider worth doing such modification for the following reasons.

The requirements that such responsible person can show 5 years experience and holds a position within the approved organisation with appropriate responsibilities do not differ from the original text.

The requirement that such responsible person has acquired detailed knowledge of Part-M is already stated in paragraph M.A.706.

The requirement that maintenance qualifications be acceptable to the approved organisations creates difficulty as the rule itself must set the criteria for such acceptance, so as to allow control of the related decisions. This would make



the text more difficult to implement while the existing text already leaves room for several qualifications. The phrase “or equivalent” caters for it, while allowing use of grand-fathered experience. This could be further developed through AMC material. The training requirement could also be subject of further AMC material for balloons, gliders and general aviation aircraft.

The deletion of the need that training carried out on the types of aircraft operated be “formal” could create difficulties as regards the airworthiness review of large aircraft. Nevertheless the Agency will review AMC material to take into account specific issues for balloons, gliders and general aviation aircraft.

#### **b) M.A.711 Privileges of the organisation**

20. The recommendations can be found on

- Page 6 of Appendix I (vi) “Summary of Recommendations”,
- Pages 63-66 of Appendix I “Consolidated Comments Report”.

Stakeholders fear that the obligation of registration prevents individual persons from being approved. The consultant therefore proposes to change the phrase “registered in one of the Member States” in paragraph (c) by “located in one of the Member States”.

This proposal does not seem opportune as it it would create a problem with foreign companies. Such a company could indeed be located in one Member State but registered in a third country. This could be the case for a third country company setting up a subsidiary in one of the EU Member States. The subsidiary would be located in a Member State. If the proposal were accepted the subsidiary would have the privilege to issue ARC’s without being subject to sufficient oversight and enforcement. It is therefore of great importance that the Subpart G organisation is registered in a Member State. This however does not deprive individual persons from being approved, as, in legal terms, the fact that a person is declared and hold an Identity Card or a working permit is assimilated to a registration.

#### **c) M.A.901 Aircraft airworthiness review paragraph (f)**

21. The recommendations can be found on

- Pages 10-11 of Appendix I (vi) “Summary of Recommendations”,
- Pages 82-86 of Appendix I “Consolidated Comments Report”.

Some stakeholders fear that the renewal of the airworthiness review certificate every year be too costly, especially for owners of small aircraft. In their view individuals should be able to issue the ARC. The consultant therefore proposes to add a new paragraph (f) for small aircraft of 2730 kg or less to derogate from paragraph (d) in respect to the validity of the Airworthiness Review Certificate (ARC) and its issue by a certifying person.

The Agency considers that this proposal does not follow the general concept of Part-M. Within a controlled environment the validity of the ARC can be extended twice for a period of one year. For aircraft that are not in a controlled environment, the ARC is to be issued every year by the competent authority. This is in fact not very different to the system of annual renewal of the certificates of airworthiness used currently in many Member States. Derogating to this concept would not provide for a proper safety oversight and lead to down grading the current levels. Furthermore, the change proposed in paragraph B.b above would allow a one man organisation without the need for a quality system. This should provide for the flexibility sought by concerned while avoiding certain aircraft getting outside the system.

## **V. Regulatory Impact Assessment**

22. This NPA results from a regulatory impact assessment made by an external consultant with the involvement of a broad basis of stakeholders such as national aviation authorities and organisations representing the non-commercial aviation sector affected by the Part-M implementation. For each paragraph to be changed the impact on safety, economic, social and other fields has been investigated on the existing regulation. In order to reduce these impacts and facilitate the implementation of Part-M the suggested changes were developed as explained in the consultant's report. These changes have positive impact on the regulated persons while not affecting the level of safety. They also contribute to the clarification and understanding of the text and should facilitate the implementation of Part-M for stakeholders.

## **B. DRAFT OPINION**

**Proposal for a**  
**COMMISSION REGULATION (EC) No ../..**  
**of [...]**

**amending Commission Regulation (EC) No 2042/2003, on the continuing  
airworthiness of aircraft and aeronautical products, parts and appliances, and  
on the approval of organisations and personnel involved in these tasks**

**(Text with EEA relevance)**

THE COMMISSION OF THE EUROPEAN COMMUNITIES,

Having regard to the Treaty establishing the European Community,

Having regard to Regulation (EC) No 1592/2002 of the European Parliament and of the Council of 15 July 2002 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency<sup>4</sup> (hereinafter referred to as "the Basic Regulation"), and in particular Articles 5 and 6 thereof,

Having regard to Commission Regulation (EC) No 2042/2003, on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks,<sup>5</sup>

Whereas:

- (1) Article 7 (6) of Commission Regulation (EC) No 2042/2003 requires the Agency to make an evaluation of the implication of the provisions of Part-M and submit an opinion to the Commission. The Agency has contracted a consultant to make an exhaustive regulatory impact assessment of such impact on non-commercial aviation to serve as a basis for this opinion.
- (2) The measures provided by this Regulation are based on the opinion issued by the Agency<sup>6</sup> in accordance with Articles 12(2) (b) and 14(1) of the Basic Regulation.
- (3) The measures provided for in this Regulation are in accordance with the opinion<sup>7</sup> of the European Aviation Safety Agency Committee established by Article 54(3) of the Basic Regulation.

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<sup>4</sup> OJ L 240, 7.9.2002, p. 1. Regulation last amended by Regulation (EC) No 1701/2003 (OJ L 243, 27.9.2003, p. 5.

<sup>5</sup> OJ L 315, 28.11.2003, p. 1.

<sup>6</sup> [to be issued]

- (4) The Commission Regulation (EC) No 2042/2003 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

*Article 1*

The following amendments to Annex I Part-M of Commission Regulation (EC) 2042/2003 shall be made:

[For ease of understanding deleted text is marked with ~~striketrough~~ and new text is marked **bold underlined**. Unchanged text is marked with \*\*\*. In the final Regulation the drafting will be done in accordance with Community guidelines.]

**M.A.607 Certifying staff**

~~(b) In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff is available, the maintenance organisation contracted to provide maintenance support may issue a one-off certification authorisation:~~

- ~~1. to one of its employees holding type qualifications on aircraft of similar technology, construction and systems; or~~
- ~~2. to any person with not less than five years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.~~

~~All such cases must be reported to the competent authority within seven days of the issuance of such certification authorisation. The approved maintenance organisation issuing the one-off certification authorisation shall ensure that any such maintenance that could affect flight safety is re-checked.~~

**(b)(c)\*\*\***

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<sup>7</sup> [to be issued]

## M.A.712 Quality system

(f) In the case of a small M.A. Subpart G organisation ~~that does not have the privileges granted under M.A.711(b)~~, the quality system can be replaced by performing organisational reviews on a regular basis, **provided that the M.A.703 extent of approval does not include aircraft used for commercial activity or aircraft above 2730kg MTOW or multi-engine helicopters.**

## M.A.801 Aircraft certificate of release to service

(b)\*\*\*

**(c) By derogation to M.A.801(b) in the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff is available, the person responsible under M.A.201(a) may authorise any person with not less than 3 years maintenance experience and holding a valid ICAO compliant aircraft maintenance licence rated for the aircraft type requiring certification, provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.**

**The person responsible under M.A.201(a) shall:**

- 1. obtain and hold in the aircraft records details of all the work carried out and of the licence held by that person issuing the certification, and**
- 2. ensure that any such maintenance that could affect flight safety is rechecked by an appropriately authorised M.A.801(b) person, and**
- 3. notify the competent authority or the contracted Subpart G organisation responsible for continuing airworthiness management when contracted in accordance with M.A.201(e) within 7 days of the issuance of such certification authorisation.**

~~(d)(e)~~\*\*\*

~~(e)(d)~~\*\*\*

~~(f)(e)~~\*\*\*

~~(g)(f)~~\*\*\*

## M.A.901 Aircraft airworthiness review

(e) Whenever circumstances show the existence of a potential safety threat **or in the absence of a continuing airworthiness management organisation approved for the aircraft type**, the competent authority may decide to carry out the airworthiness review and issue the airworthiness review certificate itself. In this case, the owner or operator shall provide the competent authority with:

- the documentation required by the competent authority,
- suitable accommodation at the appropriate location for its personnel, and
- when necessary the support of personnel appropriately qualified in accordance with Part-66.

## Appendix I Continuing Airworthiness Arrangement

### 5.1. Obligations of the approved organisation:

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5. inform the competent authority of the ~~airworthiness~~ Member State of registry whenever the aircraft is not presented to the approved maintenance organisation by the owner as requested by the approved organisation;

6. inform the competent authority ~~airworthiness authorities~~ of the Member State of registry whenever the present arrangement has not been respected;

7. carry out the airworthiness review of the aircraft when necessary and ~~issue~~ fill the airworthiness review certificate or ~~make a~~ the recommendation for an airworthiness review to the competent authority of the Member State of registry;

8. \*\*\*

9. inform the competent authority ~~authorities~~ of the Member State of registry whenever the present arrangement is denounced by either party.

### 5.2. Obligations of the owner:

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7. inform the competent authority ~~authorities~~ of the Member State of registry whenever the present arrangement is denounced by either party;

8. inform the competent authority ~~authorities~~ of the Member State of registry and the approved organisation whenever the aircraft is sold;

\*\*\*

**10. inform the approved organisation of the aircraft flying hours on a regular basis as agreed with the approved organisation.**

## Appendix II EASA Form 1

*Block 13...*

...

Some examples of the information to be quoted are as follows:

- ...

~~M.A. Subpart F approval reference.~~ **Part-M Certificate of Release to Service**

~~Block 19 Contains the required release to service statement~~ For all maintenance by M.A. Subpart F approved maintenance organisations **the box “other regulation box specified in block 13” shall be ticked and the certificate of release to service statement made in block 13.** ~~When non Part M maintenance is being released block 13 shall specify the particular national regulation. In any case the appropriate box shall be ‘ticked’ to validate the release.~~

...

## Appendix VIII Limited Pilot Owner Maintenance

The following constitutes the limited pilot maintenance referred to in M.A.803 provided it does not involve complex maintenance tasks and is carried out in accordance with M.A.402. **Limited pilot owner maintenance tasks as**

**appropriate to a particular aircraft shall be specifically listed in the maintenance programme.**

1. Removal, installation of wheels. **In the case of gliders, also replacing elastic landing gear door operating straps.**
2. Replacing elastic shock absorber cords on landing gear.
3. Servicing landing gear shock struts by adding oil, air, or both.
4. Servicing landing gear wheel bearings, such as cleaning and greasing. **In the case of gliders, also replacing and servicing main skids and tailskids.**
5. Replacing defective safety wiring or cotter keys.
6. Lubrication not requiring disassembly other than removal of non-structural items such as cover plates, cowlings, and fairings.
7. Making simple fabric patches not requiring rib stitching or the removal of structural parts or control surfaces. In the case of balloons, the making of small fabric repairs, **excluding complete panels,** to envelopes (as defined in, and in accordance with, the ~~balloon manufacturers'~~ **type certificate holders'** instructions) not requiring load tape repair or replacement.
8. Replenishing hydraulic fluid in the hydraulic reservoir.
9. Refinishing decorative coating of fuselage, balloon baskets, wings tail group surfaces (excluding balanced control surfaces), fairings, cowlings, landing gear, cabin, or cockpit interior when removal or disassembly of any primary structure or operating system is not required.
10. Applying preservative or protective material to components where no disassembly of any primary structure or operating system is involved and where such coating is not prohibited or is not contrary to good practices.
11. Repairing upholstery and decorative furnishings of the cabin, cockpit, **interior** or balloon basket ~~interior~~ when the repairing does not require disassembly of any primary structure or operating system or interfere with an operating system or affect the primary structure of the aircraft.
12. Making small simple repairs to fairings, non-structural cover plates, cowlings, and small patches and reinforcements not changing the contour so as to interfere with proper air flow. **In the case of gliders, also making minor repairs to direct vision windows and canopies.**
13. Replacing side windows where that work does not interfere with the structure or any operating system such as controls, electrical equipment, etc.
14. Replacing safety belts. **In the case of balloons, airships and gliders, also replacing harnesses.**
15. Replacing seats or seat parts with replacement parts approved for the aircraft, not involving disassembly of any primary structure or operating system.
16. Trouble shooting and repairing broken circuits in landing light wiring circuits. **In the case of gliders, also trouble shooting and repairing broken wiring circuits for non-critical optional equipment.**
17. Replacing bulbs, reflectors, and lenses of position and landing lights.
18. Replacing wheels and skis where no weight and balance computation is involved.
19. Replacing any cowling not requiring removal of the propeller or disconnection of flight controls.
20. Replacing or cleaning spark plugs and setting of spark plug gap clearance.
21. Replacing any hose connection except hydraulic connections. **In the case of balloons and airships, the replacement of propane or similar hoses is prohibited.**

22. Replacing prefabricated fuel lines. **In the case of balloons and airships, the replacement of prefabricated fuel lines is limited to flexible hose types with quick release connectors.**
23. Cleaning or replacing fuel and oil strainers or filter elements.
24. Replacing and servicing batteries.
25. Cleaning **and replacing** balloon burner pilot and main nozzles **and piezo-electric igniters** in accordance with the balloon **type certificate holder's** manufacturer's instructions.
26. Replacement or adjustment of non-structural standard fasteners incidental to operations.
27. The interchange of balloon baskets, **fuel cylinders** and burners on envelopes when the basket, **fuel cylinder** or burner is designated as interchangeable in the balloon type certificate data and the baskets, **fuel cylinders** and burners are specifically designed for quick removal and installation.
28. The installations of anti-misfuelling devices to reduce the diameter of fuel tank filler openings provided the specific device has been made a part of the aircraft type certificate data by the aircraft manufacturer, the aircraft manufacturer has provided instructions for installation of the specific device, and installation does not involve the disassembly of the existing tank filler opening.
29. Removing, checking, and replacing magnetic chip detectors.
30. Removing and replacing self-contained, front instrument panel-mounted navigation and communication devices that employ tray-mounted connectors that connect the unit when the unit is installed into the instrument panel, (excluding automatic flight control systems, transponders, and microwave frequency distance measuring equipment (DME)). The approved unit must be designed to be readily and repeatedly removed and replaced, not require specialist test equipment and pertinent instructions must be provided. Prior to the unit's intended use, an operational check must be performed. **In the case of gliders or powered glider's instrument panels, these may be removed and reinstalled providing all air data connections are self sealing connector blocks.**
31. Updating self-contained, front instrument panel-mounted Air Traffic Control (ATC) navigational software databases (excluding those of automatic flight control systems, transponders, and microwave frequency distance measuring equipment (DME)) provided no disassembly of the unit is required and pertinent instructions are provided. Prior to the unit's intended use, an operational check must be performed.
32. Replacement of wings and tail surfaces and controls, **balloon envelopes, baskets, burners and controls (including safety pins, turnbuckles and karabiners)** the attachment of which are designed for assembly immediately before each flight and dismantling after each flight. **In the case of gliders, also minor adjustment to non-flight or propulsion controls whose operation is not critical for any phase of flight.**
33. Replacement of main rotor blades that are designed for removal where specialist tools are not required.
34. **Replacement of balloon and airship fuel cylinder quick release connector seals where accessible in accordance with the balloon type certificate holder's instructions.**
35. **Minor adjustment of balloon burner shut-off valves without disassembly in accordance with the balloon type certificate holder's instructions.**



36. Replacement of balloon envelope temperature sensors.
37. Minor adjustment of balloon basket skids retaining fasteners in accordance with type certificate holders' instructions.
38. In the case of a self-sustaining gliders the removal only of the propulsion system where defined in the Flight Manual as a pilot task and where all connections are self sealing.
39. Cleaning and lubrication of glider tow release units where specified as a daily inspection.
40. In the case of gliders, replacement of flying control self adhesive sealing tapes and tabulators providing removal of a control surface or operating system is not required, and a full and free check of the controls is carried out.
41. Minor scheduled maintenance (excluding Airworthiness Directives unless specifically allowed) required at 50 hours / 6 months or less for piston-engine aeroplanes, piston-engine helicopters, gliders, balloons or airships with MTOW not exceeding 2730 kg where specified in accordance with M.A.803(c).