



Notice of Proposed Amendment 2013-19

Embodiment of Safety Management System (SMS) requirements into Commission Regulation (EC) No 2042/2003

RMT.0251 (MDM.055) — 10/10/2013

EXECUTIVE SUMMARY

This NPA proposes to amend Annexes III 'Part-66' and IV 'Part-147' to Commission Regulation (EC) No 2042/2003 to implement SMS and to support the implementation of SSP/EASP. It relates to the ongoing EASp actions SYS 1.3 and SYS 2.2. As for NPA 2013-01, the majority of changes are based on Subparts GEN of the authority and organisation requirements, and related AMCs/GM issued with the Regulations for civil aviation air crew and air operations respectively. The existing rule structure remains unchanged.

- (a) Changes to Part-147 Section A (technical requirements) mainly focus on the creation of streamlined, consolidated management system requirements that, while built upon existing quality systems, improve consistency in organisation approvals, and introduce additional requirements related to hazard identification, risk evaluation, and effective risk mitigation. The new requirements ensure compatibility with existing management systems, and facilitate systems integration for organisations holding more than one certificate. The proposed management system framework, together with the Essential Requirements of the Basic Regulation, address elements of the ICAO SMS framework (as per ICAO Annex 19 'Safety Management') while ensuring proportionality and flexibility.
- (b) Changes to Part-147 Section B (authority requirements) take due account of the critical elements of a State's safety oversight system as promoted by ICAO, support the implementation of SSPs, and serve the standardisation objective set out in the Basic Regulation. This aims at streamlining procedures for oversight, and introduces new management system requirements for competent authorities to increase efficiency and support the establishment of a comprehensive aviation safety management system at EU level, encompassing EU and Member States' responsibilities for safety management.
- (c) Changes to Part-66 are limited to introducing management system requirements in Section B 'Procedures for the competent authority' and updating the training syllabus in modules 9A and 9B with new SMS related elements.

The NPA includes a proposal for transition measures for organisations and authorities to adapt to the new requirements.

Applicability		Process map	
Affected regulations and decisions:	Part-147 — IR, AMCs & GM Part-66 — IR, AMCs & GM	Concept Paper:	No
		Terms of Reference:	18.07.2011
		Rulemaking group:	No
Affected stakeholders:	Part-147 organisations and competent authorities, applicants for an AML	RIA type:	Light
Driver/origin:	Legal obligation (ICAO) - EASp	Technical consultation during NPA drafting:	Yes (EHFAG)
Reference:		Duration of NPA consultation:	3 months
		Review group:	TBD
		Focussed consultation:	TBD
		Publication date of the Opinion:	TBD
		Publication date of the Decision:	TBD

Table of contents

1.	Procedural information	4
1.1.	The rule development procedure	4
1.2.	The structure of this NPA and related documents	4
1.3.	How to comment on this NPA.....	5
1.4.	The next steps in the procedure	5
2.	Explanatory Note	6
2.1.	Overview of the issues to be addressed.....	6
2.2.	Objectives	6
2.3.	Summary of the Regulatory Impact Assessment (RIA)	7
2.4.	Overview of the proposed amendments	7
2.4.1.	Organisation requirements and management system	7
2.4.2.	Proportionality and flexibility	8
2.4.3.	Management system	9
2.4.4.	Changes to the Maintenance Training Organisation Exposition - Management system documentation.....	11
2.4.5.	Industry standards	12
2.4.6.	Internal safety reporting scheme.....	12
2.4.7.	Indirect approval vs. changes not requiring prior approval	13
2.4.8.	Authority requirements Part-66.....	13
2.4.9.	Authority requirements Part-147	13
2.4.10.	Alternative means of compliance (Part-147)	14
2.4.11.	Management system for competent authorities (Part-66 and Part-147).....	15
2.4.12.	Oversight (Part-147)	16
2.4.13.	Origin of changes to Section B (Part-66 and Part-147).....	17
2.4.14.	Changes to Part-66 Appendix I – Basic Knowledge Requirements	18
2.4.15.	Editorial and consistency changes (Part-147).....	19
2.4.16.	Transition measures proposed	22
3.	Proposed amendments	23
3.1.	Draft Regulation (Draft EASA Opinion) and Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision)	24
4.	Regulatory Impact Assessment (RIA)	131
4.1.	Issue which the NPA is intended to address and sectors concerned.....	131
4.2.	Objectives	133
4.3.	Policy options	133
4.4.	Methodology and data (only for a full RIA)	134
4.4.1.	Applied methodology	134
4.4.2.	Data collection	134
4.5.	Analysis of impacts.....	134
4.5.1.	Safety impact	134
4.5.2.	Environmental impact.....	136
4.5.3.	Social impact.....	136
4.5.4.	Economic impact.....	136
4.5.5.	General aviation and proportionality issues.....	139
4.5.6.	Impact on 'Better Regulation' and harmonisation	139

4.6.	Comparison and conclusion	140
4.6.1.	Comparison of options	140
4.6.2.	Monitoring and ex post evaluation	140
5.	References	141
5.1.	Affected regulations.....	141
5.2.	Affected CS, AMC and GM.....	141
5.3.	Reference documents	141
6.	Appendices: Detailed description of changes	142

1. Procedural information

1.1. The rule development procedure

The purpose of this Notice of Proposed Amendment (NPA) is to envisage amending Commission Regulation (EC) No 2042/2003 of 20 November 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, and amending related ED Decision No 2003/19/RM of the Executive Director of the European Aviation Safety Agency of 28 November 2003 on Acceptable Means of Compliance (AMC) and Guidance Material (GM) for the implementation of organisation management system and authority requirements providing for compliance with the relevant ICAO standards on Safety management (SMS and SSP) in the field of continuing airworthiness. The scope of this rulemaking activity is outlined in Terms of Reference MDM.055 issue I, v.2 published on 18 July 2011, and is described in more detail below.

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') is directly involved in the rule-making process. It assists the Commission in its executive tasks by preparing draft regulations, and amendments thereof, for the implementation of the Basic Regulation¹ which are adopted as 'Opinions' (Article 19(1)). It also adopts Certification Specifications, including Acceptable Means of Compliance, and Guidance Material to be used in the certification process (Article 19(2)).

When developing rules, the Agency is bound to follow a structured process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board, and is referred to as 'The Rulemaking Procedure'². This rulemaking activity is included in the Agency's Rulemaking Programme for 2013-2016. It implements the rulemaking task RMT.0251 (MDM.055).

The text of this NPA has been developed by the Agency. It is submitted for consultation of all interested parties in accordance with Article 52 of the Basic Regulation and Articles 5(3) and 6 of the Rulemaking Procedure.

1.2. The structure of this NPA and related documents

Chapter 1 of this NPA contains the procedural information related to this task. Chapter 2 (Explanatory Note) explains the core technical content. Chapter 3 contains the proposed text for an amending Regulation to Commission Regulation (EC) No 2042/2003, as well as for the proposed amendments to Annex III 'Part-66' and Annex IV 'Part-147' thereto. Chapter 4 contains the Regulatory Impact Assessment. Chapter 5 provides a list of relevant reference documents and Chapter 6 'Appendix' includes a detailed list of changes proposed, with an indication of the origin of new text.

¹ Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1). Regulation as last amended by Commission Regulation (EU) No 6/2013 of 8 January 2013 (OJ L 4, 9.1.2013, p. 34).

² Management Board Decision concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material (Rulemaking Procedure), EASA MB Decision No 01-2012, 13.3.2012.

1.3. How to comment on this NPA

Please submit your comments using the automated **Comment-Response Tool (CRT)** available at <http://hub.easa.europa.eu/crt/>³.

The deadline for submission of comments is **10-01-2014**.

1.4. The next steps in the procedure

Following the closing of the NPA public consultation period, the Agency will review all comments.

The outcome of the NPA public consultation will be reflected in the Comment-Response Document (CRD).

The Agency will publish a CRD with responses to NPA comments for reactions by stakeholders.

Opinions published by the Agency contain proposed changes to European regulations and are addressed to the European Commission, which uses them as a technical basis to prepare legislative proposal.

Decisions containing Acceptable Means of Compliance (AMC) and Guidance Material (GM) are published by the Agency once the related Implementing Rules (IRs) are adopted.

³ In case of technical problems, please contact the CRT webmaster (crt@easa.europa.eu).

2. Explanatory Note

This NPA complements NPA 2013-01 Parts (A), (B) and (C) with proposed amendments to Part-M and Part-145 to adapt Commission Regulation (EC) No 2042/2003 and corresponding AMCs/GM for the implementation of organisation management system requirements and streamlined authority requirements.

2.1. Overview of the issues to be addressed

This NPA proposes to amend Annexes III 'Part-66' and IV 'Part-147' to Commission Regulation (EC) No 2042/2003 to implement the ICAO SMS framework and to support the implementation of SSP/EASP. It relates to the ongoing EASp actions SYS 1.3 'Incorporation of SSP in all domains of aviation' and SYS 2.2 'Incorporation of SMS in all domains of aviation'.

2.2. Objectives

The overall objectives of the EASA system are defined in Article 2 of the Basic Regulation. This proposal will contribute to the achievement of the overall objectives by addressing the issues outlined in Chapter 2 of this NPA.

The principal objective of RMT MDM.055 is to adapt Commission Regulation (EC) No 2042/2003 and corresponding AMCs/GM for the implementation of management system requirements providing for compliance with the relevant ICAO standards on Safety Management Systems (SMS) and State Safety Programme (SSP) in the field of continuing airworthiness. This shall ensure compliance with the latest ICAO standards and recommended practices, thus facilitating international harmonisation, and enhancing safety by introducing new safety management requirements.

The authority and organisation requirements developed in the context of the extension of the Agency remit to the fields of air crew and air operations form the basis for the current rulemaking task. The 'generic' portion (Subpart 'GEN' = general requirements) of these authority and organisation requirements had been designed to ensure general applicability throughout all areas within the Agency's remit. Considering this approach, consultation on the corresponding NPAs was initiated with a view to this general applicability.

More specifically, the amendments proposed with this rulemaking task are based on:

- (a) Commission Regulation (EU) No 290/2012⁴:
 - (1) *Subpart GEN of Annex VI Part-ARA (Authority Requirements for Aircrew) and ED Decision 2012/006/R with related AMCs and GM; and*
 - (2) *Subpart GEN Annex VII Part-ORA (Organisation Requirements for Aircrew) and ED Decision 2012/007/R with related AMCs and GM.*
- (b) Commission Regulation (EU) No 965/2012⁵:

⁴ Commission Regulation (EU) No 290/2012 of 30/03/2012 amending Regulation (EU) No 1178/2011 of 03/11/2011 laying down technical requirements and administrative procedures related to civil aviation aircrew pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council. (OJ L 100, 5.4.2012, p.1-56)

⁵ Commission Regulation (EU) No 965/2012 of 05/10/2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council. (OJ L 296, 25.10.2012, p.1-148), as last amended by Commission Regulation (EU) No 800/2013 of 14 August 2013

- (1) Subpart GEN Annex II Part-ARO (Authority Requirements applicable to Air Operations) and ED Decision 2012/016/R with related AMC's and GM; and
- (2) Subpart GEN Annex III Part-ORO (Organisation Requirements for Air Operations) and ED Decision 2012/017/R with related AMC's and GM.

The Subparts GEN in Authority and Organisation requirements for Aircrew and Air Operations are fully aligned. Therefore, hereafter, any reference to specific items within these requirements is made by using 'ORX' for the Organisation Requirements and 'ARX' for the Authority Requirements.

2.3. Summary of the Regulatory Impact Assessment (RIA)

Options identified

0	Baseline option (no change in rules)
1	A rulemaking action to achieve the specific objectives specified in 2.2 in relation to Part-66 and Part-147.

The need for an amendment to Commission Regulation (EC) No 2042/2003, in particular in the area of Annexes III 'Part-66' and IV 'Part-147', is supported on the grounds of overall consistency, safety and increased efficiency. For a more detailed discussion, see Section 4.

2.4. Overview of the proposed amendments

2.4.1. Organisation requirements and management system

The Agency supports an integrated approach to the management of safety by incorporating safety management elements into the management systems of an organisation and the authority. The evaluation of the ICAO SMS standards and recommended practices (SARPs) showed that many elements of the ICAO SMS are also addressed by the 'Consistency of Organisation Approvals' (COrA) initiative which had been started under the JAA (see also Advance-Notice of Proposed Amendment, A-NPA 15-2006⁶). The ICAO objective of introducing SMS in all aviation fields can be best supported by introducing streamlined requirements for certification and oversight together with a common management system framework, complemented with area-specific requirements where necessary.

Common organisation requirements, along with the corresponding authority requirements, contribute to implementing some essential recommendations of the COrA report. JAA had introduced the concept of approved organisations in all its regulated fields as an important tool to promote safety. As the JARs had been developed progressively, and more or less independently for each field, the regulatory material varied in many aspects. Inconsistencies regarding organisation approvals became apparent while implementing the JARs, and while some of them were justified by the specificity of the field that was addressed, many others were not justified. The Agency chose a gradual approach for harmonising organisation approvals: In a first step, these recommendations were taken into account for drafting the implementing rules for air crew and air operations. With this rulemaking task, the COrA recommendations are being considered for continuing airworthiness organisations. Improved consistency in organisation approvals further aims

⁶ [http://www.easa.europa.eu/rulemaking/docs/npa/2006/final%20A-NPA%2015-2006%20COrA%20\(26.09.06\).pdf](http://www.easa.europa.eu/rulemaking/docs/npa/2006/final%20A-NPA%2015-2006%20COrA%20(26.09.06).pdf)

to facilitate acceptance of EASA rules by its main counterparts, such as FAA and TCCA. Acceptance of approvals and certificates in the framework of bilateral aviation safety agreements will greatly benefit from harmonised and streamlined requirements for granting such approvals and certificates.

An efficient and effective management system requires the organisation to analyse and assess its system, processes, and their interrelations in order to identify strengths, non-conformities, weaknesses, and hazards in view of ensuring effective compliance and achieving continual improvement. This is not only most adequate in the EASA regulatory and institutional system that relies on organisation approvals, but also probably best adapted for the implementation of the ICAO SMS framework. The management system requirements combine safety management and compliance monitoring provisions into a single set of requirements. The proposed management system framework while addressing the elements of the ICAO SMS framework as per ICAO Annex 19, promotes an integrated approach to the management of an organisation by including the additional safety management components into the existing organisation requirements, rather than adding them as a separate framework. This aims at encouraging organisations to embed safety management into all safety relevant activities, instead of (super)imposing another system onto their existing management systems.

Through the adoption of a common management system framework for all approved organisations in the area of airworthiness, air operations, and air crew, the implementation of safety management processes will be facilitated for organisations holding more than one approval. This approach entails a wider applicability of the EASA management system framework compared to that of the existing ICAO SMS SARPs in Annexes 1 and 6 which basically mandate an SMS only for those activities that are directly related to the operation of aircraft. By contrast, the Agency is of the opinion that all 'components' of the Air Transportation System, contributing with different degrees to the overall level of safety, need to be considered. From a systems safety perspective, this will not only support 'interoperability' of those components, but also encourage the adoption and promotion of common principles and semantics in the area of safety management.

2.4.2. Proportionality and flexibility

In determining the right balance between Implementing Rules and AMCs composing the management system framework, the Agency considered the need to ensure resilience of the rules: Progress in digital communications, computer science, and other disciplines open the way to a wide range of technical alternatives, and the number of available choices continuously grows, with ever increasing complexity of operations and of related business models. This increased complexity not only requires authorities and organisations to implement effective management systems, it also requires flexibility for organisations to meet or exceed the safety objectives defined by the Implementing Rules by adopting means of compliance and risk mitigation strategies, as they see fit, depending on their particular organisation, business model, infrastructures, and type of operations.

Therefore, the proposed management system requirements are structured so as to clearly set the safety objective in the Implementing Rule while the detailed means of achieving this objective are defined as AMC. This provides flexibility, as an organisation may propose means alternative to those established in the Agency AMC in order to meet or exceed the objective set at rule level. This is particularly relevant in the area of safety risk

management, an area where a 'one size fits all' approach typically will not work. Therefore, no overly detailed requirements are included at the level of the Implementing Rules.

SECTION A

2.4.3. Management system

The ICAO SMS framework has been implemented by defining specific management system requirements and related AMCs/GM.

In order to define a consistent set of management system requirements that would be compatible with a wide range of management system standards the current requirements related to 'quality system' have been reviewed. As they stand, these provisions primarily focus on elements such as the monitoring of compliance, a proper reporting to management, and the need to take effective corrective actions and follow-up on these. The current rules also do not define 'quality system' in reference to any known industry standard, such as ISO 9000 series. Therefore, at the level of the regulatory material it is no longer considered appropriate to refer to such system as 'quality system'. This does not mean that organisations have to adopt this same terminology. They may continue to refer to their system as they have been doing, as long as they comply with the requirements. Monitoring of compliance remains as one core element of the new management system.

The alignment with management system requirements defined in ORX.GEN.200 aims to ensure that the same basic organisation requirements apply to all organisations certified within the scope of Commission Regulation (EC) No 2042/2003, Commission Regulation (EU) No 1178/2011 as amended by Commission Regulation (EU) No 290/2012 (Air Crew), as well as Commission Regulation (EU) No 965/2012 (Air Operations) as last amended by Regulation (EU) 800/2013.

The genuinely new element included with these common management system requirements is the requirement for organisations to implement processes for hazard identification, risk assessment and mitigation, as well as for ensuring effective actions are taken to address the risks. These core elements for safety management are complemented with detailed means of compliance and guidance material.

The approach proposed for Part-147 organisations with regard to the type of management system and safety risk management processes to be implemented is to consider them as 'non-complex' organisation. This approach considers that the contribution of maintenance training and examination related hazards to an aircraft accident or incident is more 'remote' than that of a typical safety hazard in a Part-M Subpart G or Part-145 organisation for example.

The management system core requirements introduced in 147.A.130 focus on what is essential for safety management, by mandating the organisation to:

- (a) clearly define responsibilities and accountabilities;
- (b) establish a safety policy;
- (c) ensure the identification of aviation safety hazards entailed by its activities, ensure their evaluation, and the management of associated risks;
- (d) take actions to mitigate the risks and verify their effectiveness;

- (e) maintain its personnel trained, competent, and informed about significant safety issues;
- (f) document all management system key processes; and
- (g) monitor compliance, while considering any additional requirements that are applicable to the organisation.

To properly reflect the compliance monitoring function described in point (g) above, 147.A.105 'Personnel requirements' has been amended to clarify the requirement for the organisation to appoint a person with responsibility for the compliance monitoring function. This function is pivotal to the implementation and maintenance of the new management system framework as proposed with this NPA: Effective compliance with the applicable safety requirements constitutes the baseline for such new management system.

The management system core requirements come with a series of AMC providing means to comply. Where necessary, these are complemented with Guidance Material (GM) to assist in the understanding and implementation of specific elements. It is important to note that such GM are primarily of an informative nature, they should not include any elements that constitute means of compliance.

The table below provides an overview of the new AMC/GM complementing the new common management system requirements with a reference to the corresponding ORX AMC/GM where applicable:

Part-147	Subject	Corresponding ORX AMC/GM
AMC1 147.A.130(a)(1);(2);(3);(5)	Management system <ul style="list-style-type: none"> – Safety risk management – Management of change – Person fulfilling the role of safety manager – Identification of safety management related responsibilities – Safety policy – Emergency response plan 	AMC1 ORX.GEN.200 (a)(1);(2);(3);(5)
GM1 147.A.130 (a)(1)	Person fulfilling the role of safety manager	GM1 ORX.GEN.200(a)(1).
GM1 147.A.130 (a)(2)	Safety policy	GM1 ORX.GEN.200(a)(2)
AMC1 147.A.130 (a)(3)	Internal safety reporting scheme	GM1 ORX.GEN.200(a)(3)
AMC1 147.A.130 (a)(4)	Training/Communication on safety	AMC1 ORX.GEN.200(a)(4)
GM1 147.A.130 (a)(5)	Management system documentation	GM1 ORX.GEN.200(a)(5)
AMC1 147.A.130 (a)(6)	Compliance monitoring function – general - audit planning cycles	AMC1 ORX.GEN.200(a)(6) This new AMC supersedes existing AMC 147.A.130(b).
GM1 147.A.130 (a)(6)	Compliance monitoring – general	n/a

The below list provides further information on the management system proposed for Part-147 organisations ('non-complex'):

- The organisation may use simple procedures and tools for its safety risk management process (e.g. checklists), and safety performance monitoring and measurement (no need to perform extensive safety studies, surveys, etc...).
- The accountable manager or a person with an operational role in the organisation may fulfil the role of safety manager.
- The accountable manager may also be the compliance monitoring manager provided that he/she has demonstrated the required competence and that the independence of the internal audits is maintained.

Moreover, the same person may act as safety manager and as compliance monitoring manager. Should this be the case, it must be ensured that sufficient resources are made available for both functions (safety management/compliance monitoring). It must also be ensured that the safety function has the necessary 'proactive' attitude to managing safety, as well as authority to request safety action. Finally, in line with the general auditing principles, the independence of internal audits must be ensured.

The organisation will be required to adapt its existing management system to be able to demonstrate that it has implemented processes for hazard identification and safety risk management related to its training, assessment, and examination activities. The organisation will also need to ensure the effectiveness of mitigation actions initiated to address risks. These new processes are particularly relevant in the case of changes to the organisation.

2.4.4. Changes to the Maintenance Training Organisation Exposition - Management system documentation

The Maintenance Training Organisation Exposition (MTOE) contents need to be amended to reflect changes made throughout Part-147, in particular in relation to the new safety management related processes.

This results in the following changes:

- (a) PART I is proposed to be renamed 'General', in order to differentiate it from PART 3 as amended.
 - § 1.1 — addition of Safety Policy – in order to limit the impact on existing expositions, it is suggested to group this with the corporate commitment of the accountable manager
 - § 1.10 — it now makes reference to the procedure for the management of changes not requiring prior approval (cf. 147.A.150 as amended)
 - § 1.12 — new chapter to include the alternative means of compliance procedure.
- (b) PART 3 — now referred to as 'MANAGEMENT SYSTEM PROCEDURES'
 - § 3.5 – Accountable Manager Annual Review - has been changed to 'Annual review of the safety performance and effectiveness of the management system'

The following new chapters are added:

- § 3.9. — Hazard identification and safety risk management schemes

§ 3.10 — Safety action planning

§ 3.11. — Management of change (including organisational changes with regard to safety responsibilities)

§ 3.12 — Training and communication on safety

§ 3.13. — Management system record keeping

§ 3.14 — Concession control for deviations from organisation's procedures

The generic term 'management system documentation' is used to refer to all documents the organisation needs to maintain in order to be able to demonstrate compliance with Part-147. This normally consists of a MTOE and the related manuals and/or procedures. The organisation may also choose to document these new management system processes in a separate manual (e.g. Safety Management Manual – SMM, Management System Manual, etc....).

For organisations certified in accordance with any other EASA Part, this may avoid or limit duplication of these elements. Moreover, it is generally possible to document specific elements in a separate procedure, to be referenced in the MTOE, or SMM, or management system manual, etc. A new GM (GM1 147.A.130(a)(5)) is provided to explain the different options.

2.4.5. Industry standards

Specific provisions at AMC level have been introduced in order to consider and give credit for the implementation of management systems in accordance with Industry standards (such as ISO 9001:2008⁷ or EN 9110:2009⁸ or later revisions) by maintenance training organisations.

These provisions address:

- the compliance monitoring function; and
- tasks carried out by another organisation not appropriately approved under Part-147.

Consequently, new AMC material has been added for the competent authorities, (Section B – cf. AMC2 147.B.305(b)), specifying the conditions for considering the existence of a certificate in accordance with Industry standards when defining the oversight programme. This is fully aligned with Part-ARX.

2.4.6. Internal safety reporting scheme

Considering the importance of effective internal reporting to build up a management system for safety and foster a positive safety culture, it is proposed to encourage the implementation of an internal safety reporting scheme. This shall provide means both for reactive and proactive hazard identification as part of safety management.

⁷ Published by the International Organization for Standardization - Case postale 56 • CH-1211 Geneva 20

⁸ Published by the Aerospace and Defence Industries Association of Europe – Standardization - Avenue de Tervuren, 270 - B-1150 Brussels -

2.4.7. Indirect approval vs. changes not requiring prior approval

The provisions on change to an existing certificate and changes to the MTOE have been reviewed to align with Part-ORX. As a result, all references to 'indirect approval' have been reworded. These changes are now designated as 'changes not requiring prior approval'. Linked to this, specific provisions are included for organisations wishing to implement changes without prior competent authority approval. The organisation shall have a procedure specifying the scope of such changes, describe how these will be managed, and submit this procedure to the competent authority for approval. The amended provisions fully meet the intent of 'indirect approval' or changes 'acceptable to the authority' as in current Part-147. These changes mainly affect current provisions in 147.A.150 'Changes to the organisation', as well as the corresponding Section B provisions in 147.B.330 'Changes'.

2.4.8. Authority requirements Part-66

Section B of Annex III 'Part-66' has been reviewed in order to transpose relevant Part-ARX Subpart GEN Section I 'General' and Section II 'Management system' authority requirements and related AMC/GM.

Considering that Part-66 was substantially amended through Regulation (EU) No 1149/2011, no further alignments are proposed with this NPA. In particular, the current provisions on issuing, suspending, or limiting a licence have not been aligned with the corresponding provisions in Part-ARA (cf. ARA.GEN.315 'Procedures for the issue, revalidation, renewal or change of licences, ratings, certificates or attestations – persons', ARA.GEN.355 'Findings and enforcement measures – persons', and ARA.FCL.250 'Limitation, suspension or revocation of licences, ratings and certificates'). This alignment would require further changes to Subparts B, C, and F of Section B.

The Agency seeks the views of stakeholders on the need for further alignment of Part-66 Section B with Part-ARA. Should the need for such further alignment be supported, it may be proposed as part of rulemaking task RMT.0544 'Review of Part-147', starting in 2014.

2.4.9. Authority requirements Part-147

Section B of Annex IV 'Part-147' has been reviewed in order to transpose relevant Part-ARX Subpart GEN authority requirements and related AMC/GM that are currently not addressed. This is not only a major step towards harmonising and streamlining authority requirements throughout the EASA rules, but it also introduces specific provisions to assist Member States in fulfilling their obligations under the Chicago Convention as related to the implementation of SSPs. These address some elements that are essential for establishing a comprehensive management system at EU level, encompassing the European Union's and Member States' responsibilities for safety management. In this respect, the additional authority requirements included at Implementing Rule level (addressed to the competent authority) and the new Article 7 of the Cover Regulation on oversight capabilities (addressed to the Member State) directly support the implementation of the European Aviation Safety Programme (EASP).

More specifically, ICAO SARPs in ICAO Annex 19 'Safety Management' Chapter 3 'State Safety Management Responsibilities' require the State to establish and implement a safety oversight system encompassing the Critical Elements (CEs) of a State's safety oversight

system⁹. The amended Section B requirements and related AMCs, therefore, address the following CEs:

- CE-3: State civil aviation system and safety oversight functions;
- CE-4: Technical personnel qualification and training;
- CE-5: Technical guidance, tools, and the provision of safety-critical information;
- CE-6: Licensing, certification, authorisation and/or approval obligations;
- CE-7: Surveillance obligations; and
- CE-8: Resolution of safety concerns.

The new authority requirements further aim at enhancing cooperation and exchange of information between authorities and the Agency, as well as between the authorities themselves. In particular, a requirement is added to ensure competent authorities will provide safety-significant information to the Agency (cf. 147.B.135). This is to ensure the Agency will receive information directly in order to be able to take timely action. This should apply whenever significant non-compliances are detected with the applicable requirements of the Basic Regulation (EC) and its Implementing Rules, with the organisation's procedures and manuals, or with the terms of an approval or certificate which lowers safety or seriously hazards flight safety.

2.4.10. Alternative means of compliance (Part-147)

New requirements on the processing of means of compliance alternative to the AMC issued by the Agency are provided (cf. 147.A.148 for organisations and 147.B.120 for the competent authority): To ensure standardisation and harmonisation, an obligation is established for the competent authority to notify the Agency of each alternative means of compliance that it has approved or is using, as well as to make available to all organisations and persons under its oversight the alternative means of compliance the competent authority itself uses to achieve compliance with the applicable rules. It is important to note that the approval by a competent authority of an alternative means of compliance for an organisation under its oversight is not transferable: Other organisations wishing to use the same alternative means of compliance have to process them again with their competent authority.

It is also possible for a competent authority to issue their own 'national' alternative means of compliance. In this case, such competent authority issued alternative means of compliance may be used by any organisation within that particular Member State. Organisations would then be able to choose between the Agency AMC and the national alternative.

These new provisions do not change in any way the legal status of the Agency AMCs: The AMCs issued by the Agency are not of a legislative nature, therefore, they cannot create obligations on the regulated persons, who may decide to show compliance with the applicable requirements using other means. If this is the case, the burden on demonstrating compliance is upon the regulated person wishing to implement an alternative means of compliance. The proposed changes aim at standardising the process for approving alternative means of compliance and providing transparency. Enhanced

⁹ See also [ICAO Annex 1 Attachment C](#) and [ICAO Annex 6 Attachment J](#) 'Framework for the State Safety programme' § 3.1.

transparency in the area of alternative means of compliance is essential to ensure a level playing field.

The Agency will be notified of any alternative means of compliance that has been approved or issued by a competent authority. The Agency will use the information received for the purpose of standardisation and for its rulemaking process. Alternative means of compliance of general interest may be proposed to be adopted as Agency AMCs, through the regular rulemaking process to ensure proper stakeholder consultation. Once they get the status of Agency AMC, it will no longer be required to provide an individual compliance demonstration.

The role and obligations included for the Agency find their legal basis in the powers attributed to the Agency to monitor the implementation of rules by competent authorities, and to standardise their performance (see Articles 10 and 24 of the Basic Regulation).

2.4.11. Management system for competent authorities (Part-66 and Part-147)

New requirements and AMC are introduced for competent authorities to establish and maintain a management system in order to discharge their responsibilities as embedded in Sections B (see 66.B.20 and 147.B.200). These management system requirements are complemented by a specific provision to establish procedures for the effective exchange of information and assistance of other authorities. This further implements the requirements of Article 15(1) of the Basic Regulation. The management system requirements for competent authorities support the implementation of SSPs. The main elements of such management system emulate typical management system requirements applicable to organisations in terms of:

- (a) documented policies and procedures;
- (b) sufficient and adequately qualified personnel, including the obligation to plan the availability of personnel;
- (c) nomination of management personnel for the different areas of activity;
- (d) adequate facilities and accommodation;
- (e) a function to monitor compliance of the management system, including an internal audit process and safety risk management process;
- (f) the nomination of a person, or group of persons responsible for the compliance monitoring function;
- (g) the need to ensure that certification and oversight tasks performed on behalf of the competent authority conform to the applicable requirements;
- (h) a system to identify changes that affect the management system, and to take action to ensure it remains effective; and
- (i) a system of record keeping to ensure traceability of activities performed.

With a view to supporting the standardisation process, and facilitating the move of that process towards continuous monitoring¹⁰, competent authorities will also be required to

¹⁰ The Continuous Monitoring Approach (CMA) will involve the establishment of a system to continuously monitor Member States according to a harmonised and consistent approach. Monitoring of Member States' safety oversight capability will be based on the following four key steps: (1) collect and validate safety data, (2) analyse and measure level of safety oversight capability, (3) identify deficiencies and assess the related risks, and (4) develop and implement strategies for risk mitigation.

provide the Agency with relevant documentation on their management system, and on changes thereto.

A new requirement is added on the use of qualified entities (cf. 66.B.12 and 147.B.205) to warrant that any certification or oversight task performed on behalf of the competent authority conforms to the applicable requirements, similar to what is required from organisations when contracting activities within their scope of approval. This new requirement is directly relevant to ensuring a high level of safety in competent authority certification and oversight activities, as well as to support uniform implementation of the relevant Basic Regulation provisions as it may be expected that competent authorities will increasingly rely on third parties to perform some specific tasks.

2.4.12. Oversight (Part-147)

For Part-147 all Section B requirements related to the initial certification, oversight, changes to a certificate and findings, corrective actions, and enforcement have been aligned with the authority requirements in Subpart GEN Section III 'Oversight, Certification and Enforcement' of Part-ARX. As a result of this review, all provisions dealing with 'indirect approval' or 'changes acceptable to the authority' have been amended for improved clarity by distinguishing between changes requiring prior approval and changes not requiring prior approval. The amended provisions fully meet the intent of 'indirect approval' or changes 'acceptable to the authority' while providing more flexibility: The competent authority may agree with the individual organisation on the specific scope of changes not requiring prior approval, and on the management of such changes, including how these should be notified to the competent authority.

A new provision has been added to 147.B.355 (former 147.B.200) to address the specific case of third-country approvals (foreign EASA Part-147 organisations and additional locations of EASA Part-147 organisations having their principal place of business in a Member State) with regards to security alerts that may exist for some States. This will allow the competent authority to suspend an approval if the security situation in that State where the facility is located is not compatible with the conduct of an on-site audit. A new AMC is provided to specify criteria for the assessment of the security situation. These criteria have been defined with the assistance of the European Commission's Directorate-General Human Resources and Security. The new provisions are closely linked to ICAO Critical elements CE-7 'Surveillance Obligations' and CE-8 'Resolution of Safety Concerns', hence they complement the State's/Agency's safety oversight system to support SSP/EASP implementation.

Another important element proposed with this NPA, also stemming from the COra initiative, is the move towards an oversight system for continuous monitoring of the safety performance of organisations and considering specific risks entailed by their activities. The relevant oversight provisions have been reviewed to align with those applicable in the scope of Commission Regulations (EU) No 290/2012 and 965/2012 (cf. Subparts GEN of Part-ARX). This now provides flexibility to extend the oversight planning cycle up to a maximum of 48 months. Criteria for extension are included at Implementing Rule level, as follows:

- An extension up to 36 months may only be applied when the organisation has demonstrated an effective identification of aviation safety hazards and management of associated risks, and has continuously demonstrated that it has full control over all changes. Additional conditions are that during the previous oversight planning cycle

no level 1 findings had been issued and that all corrective actions had been implemented within the time period accepted by the competent authority.

- A further extension up to 48 months may only be applied if the organisation complies with all of the aforementioned conditions, and in addition has established a system for continuous reporting to the competent authority on its safety performance and regulatory compliance. Such reporting system must be accepted by the competent authority.

Moreover, it is proposed that the oversight planning cycle (timelines) and oversight programme (contents) be reviewed annually to ensure they remain appropriate. Linked to this, it is proposed that whenever the competent authority extends the oversight planning cycle beyond 24 months, it should perform a 'programme validation inspection' at the organisation once within each 12-month segment of the oversight planning cycle.

Competent authorities will need to develop and implement methodologies to assess the safety performance of their industry. A link to existing guidance material developed by the Safety Management International Collaboration Group¹¹ is included to this effect.

The new oversight provisions are intended to increase the level of safety through:

- promoting a systems approach to managing oversight, by addressing all components of a system and their interactions and interfaces;
- encouraging competent authorities to further enhance their 'safety information systems' as a basis for continuous monitoring; and
- more efficient use of resources by targeting oversight towards those organisations with the lowest safety performance.

Finally, an oversight system that will encourage safety management thinking and behaviours, 'empowers' organisations to manage risks that are not addressed by regulations, and creates incentives for safety management implementation through a reduction in the oversight 'burden', will support effective implementation of the new management system provisions for organisations.

2.4.13. Origin of changes to Section B (Part-66 and Part-147)

The table below provides an overview of the new and amended implementing rules in Sections B of Part-66 and Part-147 with reference to the corresponding ARX rule paragraph in Commission Regulations (EU) No 290/2012 and 965/2012 (in the order of Part-147):

Part-147	Part-66	Subject	Corresponding ARX rule reference
147.B.115	66.B.35	Oversight documentation	ARX.GEN.115
147.B.120	--	Means of compliance	ARX.GEN.120
147.B.125	66.B.30	Information to the Agency	ARX.GEN.125

¹¹ The Safety Management International Collaboration Group (SM ICG) was founded by the United States Federal Aviation Administration, the European Aviation Safety Agency and Transport Canada Civil Aviation and is a joint cooperation between many regulatory authorities for the purpose of promoting a common understanding of safety management principles and requirements and facilitating their implementation across the international aviation community.
[http://www.skybrary.aero/index.php/Safety_Management_International_Collaboration_Group_\(SM_ICG\)](http://www.skybrary.aero/index.php/Safety_Management_International_Collaboration_Group_(SM_ICG)).

Part-147	Part-66	Subject	Corresponding ARX rule reference
147.B.135	--	Immediate reaction to a safety problem	ARX.GEN.135
147.B.200	66.B.10	Management system	ARX.GEN.200
147.B.205	66.B.12	Allocation of tasks to qualified entities	ARX.GEN.205
147.B.210	66.B.14	Changes to the management system	ARX.GEN.210
147.B.220	66.B.20	Record keeping	ARX.GEN.220
147.B.300	--	Oversight principles	ARX.GEN.300
147.B.305	--	Oversight programme	ARX.GEN.305
147.B.310	--	Initial certification procedure	ARX.GEN.310
147.B.330	--	Changes	ARX.GEN.330
147.B.350	--	Findings and corrective actions	ARX.GEN.350

2.4.14. Changes to Part-66 Appendix I – Basic Knowledge Requirements

The training syllabi in modules 9A and 9B in relation to points 'Human Error' and 'Hazards in the Workplace' have been updated to better reflect the link between Human Factors and Safety Management and to include new SMS related elements. To underscore the importance of proper knowledge of human factors and safety management principles, the required levels have also been reviewed as follows:

– **Module 9A**

- Points 9.1 'General', 9.2 'Human Performance and Limitations', and 9.8 'Human Factors' have been upgraded to level 2 for category A; and
- The new point 9.9 'Safety Management' replacing 'Hazards in the workplace' requires level 2 for all 3 categories.

– **Module 9B**

- a new point 9.9 'Safety Management' replacing 'Hazards in the workplace' has been added. It requires level 2 for all 3 categories. As this forms part of the basic knowledge requirements related to safety management, no difference should be made for category B3 staff.

This aims at ensuring that all aircraft mechanics, regardless of the type and category of licence held, will have the same level of knowledge on those issues.

These changes will not apply retroactively: Existing licence holders will not be required to pass examinations in Module 9A or 9B again. When adding another category they will be considered to comply with the requirements for module 9A (although in the past they may have passed the exam again for module 9 or even for Joint Aviation Requirements (JAR) module 9.) Upon expiration of the first 10 years, validity of the certificate of recognition or examination credits the difference will need to be examined.

Likewise, Examination credit reports used after the entry into force of this Regulation should compare the existing qualification against the amended syllabus for Module 9A or in case of category B3 in Module 9B.

2.4.15. Editorial and consistency changes (Part-147)

To align with changes made to Part-M and Part-145, a number of changes have been made for consistency.

The following terms have been changed:

- The term 'approval' has been replaced by 'certificate' when reference is made to the organisation's approval certificate as opposed to the process of approving it. This provides for a clearer distinction between actions related to the issue or reissue of a certificate and those related to the approval of changes to a certificate.
- 'Quality System' has been replaced by 'compliance monitoring function' throughout the text.
- 'Quality Manager' has been replaced by 'compliance monitoring manager'.
- 'Terms of reference' in relation to instructors, examiners, and assessors has been replaced by the more common 'Authorisation'.
- 'Synthetic training device' has been replaced by 'Simulation training device (STD)' for consistency with other EC/EASA rulemaking deliverables and current industry practice.
- 'Surveyor' (competent authority) has been replaced by 'inspector' throughout Section B.
- 'Sub-contract' and its derivatives (sub-contractor, sub-contracted, etc.) have been replaced by 'subcontract', 'subcontractor', etc. throughout the text.
- References to 'aircraft parts' have been replaced by 'aircraft components', to align with the definitions provided in Commission Regulation (EC) No 2042/2003 (parts are not defined there-in, and the Basic Regulation refers to 'parts and appliances'.
- References to 'updating training' or 'continuation training' have been replaced by 'recurrent training'.
- References to 'this Annex' or 'this Part' have been reviewed for consistency and replaced by 'this Regulation' where necessary (by referring to 'this Part', only all relevant Cover Regulation provisions, such as transition measures and grandfathering provisions, are excluded de facto).

Also, the numbering and format of those AMCs and GM that have been amended in the course of this rulemaking task have been aligned with the current EASA Rulemaking style guide, which results in:

- adding an AMC/GM number to those amended AMCs/GM (e.g. : AMC1 147.B.200(a)(1) instead of AMC 147.B.200(a)(1)), including when there is only one AMC/GM;
- adding a subtitle to all new AMCs and GM to provide an indication of their content; and
- aligning numbered lists in the AMC/GM with the number format of the Implementing Rule ((a),(b)(c) instead of 1., 2., 3.).

This results in the coexistence of two different standards for the numbering and layout of AMC/GM paragraphs and subparagraphs. For the final Agency Decisions to be issued

following adoption of the relevant amendments at Implementing Rule level, a consolidated version of all AMC's and GM with uniform numbering styles will be published.

2.4.16. Rule structure

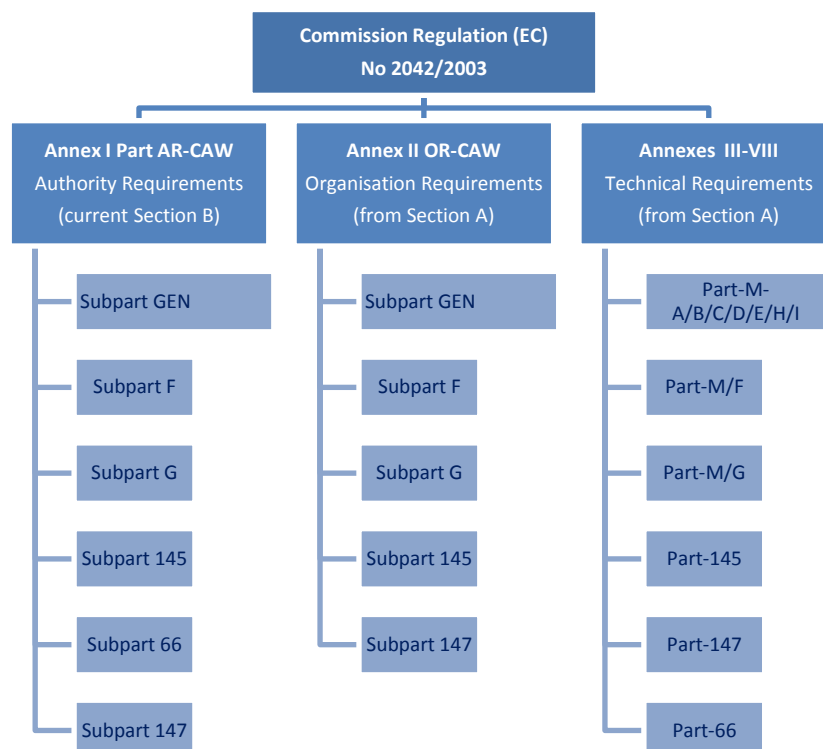
Subparts GEN of the Authority and Organisation requirements developed in the context of air crew and air operations have been transposed without changing the current structure of Commission Regulation (EC) No 2042/2003. This entailed replicating these authority and organisation requirements and related AMC's/GM in each of the Annexes/Subparts concerned, i.e.:

- Annex I 'Part-M' Subpart F,
- Annex I 'Part-M' Subpart G,
- Annex II 'Part-145',
- Annex IV 'Part-147'.

Considering the extent of resulting duplication, the Agency seeks the views of stakeholders on the possible effects and benefits of the following options:

- A.** Adapting the rule structure of Commission Regulation (EC) No 2042/2003 by separating technical requirements from organisational requirements and 'isolating' all general requirements and related AMC's/GM in Sections A and B, meaning those that are identical in all Parts.

This would allow including these generally applicable provisions only once in a dedicated Subpart GEN, which would then be complemented with additional requirements specific to each area, such as:



This would not only better align with the rule structure in Regulations (EU) No 290/2012 and 965/2012, but also facilitate future amendments to the regulatory material proposed with this NPA, while ensuring no inconsistencies will be introduced through subsequent distinct rulemaking tasks, as well as prepare for a possible future adoption of a horizontal rule structure¹² for all EASA Regulations.

or

- B.** Keeping the current rule structure while reviewing the numbering system throughout Commission Regulation (EC) No 2042/2003 in a way as to enable identification of all rules, AMCs and GM that are identical. These rules, AMCs and GM would get the same basic reference number in all Parts/Subparts.

Part-M Subpart G	Part-145	Title
M.B.115	147.B.115	Oversight documentation
M.B.120	147.B.120	Means of compliance
M.B.125	147.B.125	Information to the Agency
M.B.135	147.B.135	Immediate reaction to a safety problem
M.B.200	147.B.200	Management system
M.B.205	147.B.205	Allocation of tasks to qualified entities
M.B.210	147.B.210	Changes to the management system
M.B.220	147.B.220	Record keeping
etc.

This option would necessitate the application of the new numbering convention to all provisions (rules, AMCs and GM) throughout Commission Regulation (EC) No 2042/2003.

or

- C.** Keeping the current rule structure and numbering system, while extracting all common AMCs and GM related to the new 'Management system' requirements in Sections A of Part-M Subpart F, Part-M Subpart G, Part-145 and Part-147 to include them in a single document 'Management System', similar to current Agency AMC-20 or CASA draft Advisory Circular AC 145-1(0). This would mainly concern the AMCs and GM to 147.A.130.

and/or

- D.** Keeping the current rule structure and numbering system, while extracting all common AMCs and GM related to Subparts 'Management system' and 'Oversight, certification and enforcement' in Sections B of Part-66 and Part-147 to include them in a single document, as for option **C**.








Whereas options **B**, **C**, and **D** could be implemented as part of this rulemaking task, option **A** would require a new rulemaking task.

¹² Refer to NPA 2008-22a, paragraphs 25 to 30.

2.4.17. Transition measures proposed

The NPA includes a proposal for specific transition measures both for organisations and authorities to adapt to the new requirements. It should be noted that the final transition measures to be adopted for the amending Regulation will be determined at the level of the European Commission, when submitting the legislative proposal to the EASA Committee.

The transition measures proposed with Article 2 of the amending cover regulation, also considering the changes proposed with NPAs 20013-01(B) 'Part-M' and 2013-01(C) 'Part-145' are represented in the table below:

Article	Action	D +1 year	D+2 years	D+3 years
D = date of entry into force (20th day after publication)				
2.1	applicability of the whole amending Regulation (organisations and authorities)			
3(a)	Part-M Subpart G organisations CAT or CMPA to adapt their management system, procedures and manuals			
3(b)	Part-145 organisations to adapt their management system, procedures, and manuals			
3(c)	Part-M Subpart G organisations other than CAT or CMPA to adapt their management system, procedures, manuals			
3(d)	Part-M Subpart F organisations to adapt their management system, procedures, and manuals			
3(e)	Part-147 organisations to adapt their management system, procedures, and manuals			
3(f)	Part-147 organisations and competent authorities to implement changes to Part-66 Appendix I BASIC KNOWLEDGE REQUIREMENTS module 9A and module 9B			

Based on this proposal, whereas competent authorities would need to adapt to the new requirements at the latest one year after the entry into force, organisations would have additional time to show full compliance with the new management system requirements and related amendments. This implies that during the transition period the competent authority may not suspend, limit, or revoke a certificate on the grounds of a finding related to any of the new requirements. An implementation plan for gradual implementation of the new provisions should ideally be agreed with the competent authority before the date of applicability of the amending regulation (D + 1 year).

3. Proposed amendments

The text of the amendment is arranged to show deleted text, new or amended text as shown below:

- (a) deleted text is marked with ~~strike through~~;
- (b) new or amended text is highlighted in **grey**;
- (c) an ellipsis (...) indicates that the remaining text is unchanged in front of or following the reflected amendment.

3.1. Draft Regulation (Draft EASA Opinion) and Draft Acceptable Means of Compliance and Guidance Material (Draft EASA Decision)

Draft Opinion — amending Commission Regulation (EC) No 2042/2003

Article 1

Commission Regulation (EC) No 2042/2003 is amended as follows:

1. *Article 1 of Commission Regulation (EC) No 2042/2003 is amended as follows:*

Article 1 - Objective and scope

1. This Regulation establishes common technical requirements and administrative procedures for ensuring the continuing airworthiness of aircraft, including any component for installation thereto, which are:
 - (a) registered in a Member State; or
 - (b) registered in a third country and used by an operator for which a Member State ensures oversight of operations.
2. Paragraph 1 shall not apply to aircraft, the regulatory safety oversight of which has been transferred to a third country and which are not used by a Community operator, or to aircraft referred to in Annex II to the basic Regulation (EC) No 216/2008.
3. The provisions of this Regulation related to commercial air transport are applicable to licensed air carriers as defined by Community law.

2. *Article 2 of Commission Regulation (EC) No 2042/2003 is amended as follows:*

Article 2 - Definitions

Within the scope of the basic Regulation, the following definitions shall apply:

- (a) 'Acceptable Means of Compliance (AMC)' are non-binding standards adopted by the Agency to illustrate means to establish compliance with the Basic Regulation and its Implementing Rules;
- (b) 'Alternative means of compliance' are those that propose an alternative to an existing AMC or those that propose new means to establish compliance with the Basic Regulation and its Implementing Rules for which no associated AMC have been adopted by the Agency;
- (c) 'Aircraft' means 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;
- (d) 'Certifying staff' means personnel responsible for the release of an aircraft or a component after maintenance;
- (e) 'Component' means any engine, propeller, part or appliance;
- (f) 'Continuing airworthiness' means all of the processes ensuring that, at any time in its operating life, the aircraft complies with the airworthiness requirements in force and is in a condition for safe operation;
- (g) 'JAA' means 'Joint Aviation Authorities';
- (h) 'JAR' means 'Joint Aviation Requirements';

- ~~(g)~~ (i) 'Large aircraft' means an aircraft, classified as an aeroplane with a maximum take-off mass of more than 5 700 kg, or a multi-engined helicopter;
- ~~(h)~~ (j) 'Maintenance' means any one or combination of overhaul, repair, inspection, replacement, modification or defect rectification of an aircraft or component, with the exception of pre-flight inspection;
- ~~(i)~~ (k) 'Organisation' means a natural person, a legal person or part of a legal person. Such an organisation may be established at more than one location whether or not within the territory of the Member States;
- ~~(j)~~ (l) 'Pre-flight inspection' means the inspection carried out before flight to ensure that the aircraft is fit for the intended flight.
- ~~(k)~~ (m) 'ELA1 aircraft' means the following manned European Light Aircraft:
- (i) an aeroplane with a maximum take-off mass (MTOM) of 1 200 kg or less that is not classified as complex motor-powered aircraft;
 - (ii) a sailplane or powered sailplane of 1 200 kg MTOM or less;
 - (iii) a balloon with a maximum design lifting gas or hot air volume of not more than 3 400 m³ for hot air balloons, 1 050 m³ for gas balloons, 300 m³ for tethered gas balloons; or
 - (iv) an airship designed for not more than four occupants and a maximum design lifting gas or hot air volume of not more than 3 400 m³ for hot air airships and 1 000 m³ for gas airships.
- ~~(l)~~ (n) 'LSA aircraft' means a light sport aeroplane which has all of the following characteristics:
- (i) a Maximum Take-off Mass (MTOM) of not more than 600 kg;
 - (ii) a maximum stalling speed in the landing configuration (VS0) of not more than 45 knots Calibrated Airspeed (CAS) at the aircraft's maximum certificated take-off mass and most critical centre of gravity;
 - (iii) a maximum seating capacity of no more than two persons, including the pilot;
 - (iv) a single, non-turbine engine fitted with a propeller; and
 - (v) a non-pressurised cabin;
- ~~(m)~~ (o) 'Principal place of business' means the head office or the registered office of the undertaking within which the principal financial functions and operational control of the activities referred to in this Regulation are exercised.

3. A new Article 7 is included in Commission Regulation (EC) No 2042/2003, as follows:

Article 7 - Oversight capabilities

1. Member States shall designate one or more entities as the competent authority within that Member State with the necessary powers and allocated responsibilities for the certification and oversight of persons and organisations subject to this Regulation.
2. If a Member State designates more than one entity as competent authority:
 - (a) the areas of competence of each competent authority shall be clearly defined in terms of responsibilities and geographic limitation; and
 - (b) coordination shall be established between those entities to ensure effective oversight of all organisations and persons subject to this Regulation within their respective remits.
3. Member States shall ensure that the competent authority(ies) has (have) the necessary capability to ensure the oversight of all persons and organisations covered by their

oversight programme, including sufficient resources to fulfil the requirements of this Regulation.

4. Member States shall ensure that competent authority personnel do not perform oversight activities when there is evidence that this could result directly or indirectly in a conflict of interest, in particular when relating to family or financial interest.
5. Personnel authorised by the competent authority to carry out certification and/or oversight tasks shall be empowered to perform, at least, the following tasks:
 - (a) examine the records, data, procedures, and any other material relevant to the execution of the certification and/or oversight task;
 - (b) take copies of, or extracts from such records, data, procedures, and other material;
 - (c) ask for an oral explanation on site;
 - (d) enter relevant premises, operating sites, or means of transport;
 - (e) perform audits, investigations, assessments, inspections, including unannounced inspections; and
 - (f) take or initiate enforcement measures as appropriate.
6. The tasks under paragraph 5 shall be carried out in compliance with the legal provisions of the relevant Member State.

4. *Existing Article 7 of Commission Regulation (EC) No 2042/2003, is renumbered Article 8, as follows:*

Article 8 – Entry into force

5. *Existing Article 8 of Commission Regulation (EC) No 2042/2003, is renumbered Article 9, as follows:*

Article 9 – Agency measures

6. *A new Article 10 is included in Commission Regulation (EC) No 2042/2003 to incorporate 147.B.135:*

Article 10 – Exemptions for State education department schools

A Member State may exempt a State education department school from:

1. being an organisation as specified in 147.A.10;
2. having an accountable manager, subject to the limitation that the department appoints a senior person to manage the training organisation and such person has a budget sufficient to operate the organisation to the standard of Part-147; and
3. implementing and maintaining a compliance monitoring function of the management system subject to the department operating an independent schools' inspectorate to audit the maintenance training organisation at the frequency required by Part-147.

Article 2 – Entry into force

1. This Regulation shall enter into force on the 20th day following that of its publication in the Official Journal of the European Union. It shall become applicable one year after the entry into force.

2. Limited certifying staff authorisations issued in accordance with 145.A.30(j)(3) or (j)(4) to holders of a flight engineer licence which are valid at the date of entry into force of this Regulation shall remain valid until they expire or they are revoked by the maintenance organisation.
3. By way of derogation from paragraph 1:
 - (a) Organisations approved in accordance with Annex I to Commission Regulation (EC) No 2042/2003 'Part-M' Subpart G involved in the continuing airworthiness management of aircraft used in commercial air transport or complex motor-powered aircraft shall adapt their management system, training programmes, procedures, and manuals to be compliant with this Regulation two years after its entry into force at the latest.
 - (b) Organisations approved in accordance with Annex II to Commission Regulation (EC) No 2042/2003 'Part-145' shall adapt their management system, training programmes, procedures, and manuals to be compliant with Annex II to this Regulation two years after its entry into force at the latest.
 - (c) Organisations approved in accordance with Annex I to Commission Regulation (EC) No 2042/2003 'Part-M' Subpart G not involved in the continuing airworthiness management of aircraft used in commercial air transport or complex motor-powered aircraft shall adapt their management system, training programmes, procedures, and manuals to be compliant with Annex I to this Regulation three years after its entry into force at the latest.
 - (d) Organisations approved in accordance with Annex I to Commission Regulation (EC) No 2042/2003 'Part-M' Subpart F shall adapt their management system, training programmes, procedures, and manuals to be compliant with Annex I to this Regulation three years after its entry into force at the latest.
 - (e) Organisations approved in accordance with Annex IV to Commission Regulation (EC) No 2042/2003 'Part-147' shall adapt their management system, training programmes, procedures, and manuals to be compliant with Annex IV to this Regulation three years after its entry into force at the latest.
 - (f) All basic training courses and related examinations shall be compliant with the basic knowledge requirements of Appendix I to Annex III 'Part-66' to this Regulation two years after its entry into force at the latest.
4. Member States shall notify the Commission and the Agency of the programme for implementation of this Regulation containing actions envisaged and related timing.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Draft Opinion /Decision ANNEX IV (Part-66)

The text of the amendment is arranged to show deleted text, new text or new paragraph as shown below:

1. Deleted text is shown with a strike through: ~~deleted~~.
2. New text is highlighted with grey shading: **new**.
3. [...] indicates that remaining text is unchanged in front of or following the reflected amendment.
4. When only certain elements of the rule, AMC, or GM are amended, this is specified (e.g. '*Point 3 of the AMC is amended as below.*'). If no indication is provided, the integral text of the rule, AMC, or GM is included.
5. To facilitate processing and consultation, all new and amended AMCs and GM have been included directly after the corresponding rule, in the order of the implementing rule subparagraphs.

SECTION B PROCEDURES FOR COMPETENT AUTHORITIES

The index for SUBPART A is changed as follows:

66.B.1 Scope

~~66.B.10 Competent authority~~

66.B.10 General and management system

66.B.12 Allocation of tasks to qualified entities

66.B.14 Changes in the management system

66.B.20 Record keeping

66.B.25 Mutual exchange of information

~~66.B.30 Exemptions~~

66.B.30 Information to the Agency

66.B.35 Oversight documentation

SECTION B PROCEDURES FOR COMPETENT AUTHORITIES**SUBPART A — GENERAL AND MANAGEMENT SYSTEM****66.B.10 — Competent authority**~~(a) — General~~

~~—— The Member State shall designate a competent authority with allocated responsibilities for the issuance, continuation, change, suspension or revocation of aircraft maintenance licences. This competent authority shall establish an adequate organisational structure to ensure compliance with this Annex (Part 66).~~

~~(b) — Resources~~

~~—— The competent authority shall be appropriately staffed to ensure the implementation of the requirements of this Annex (Part 66).~~

~~(c) — Procedures~~

~~—— The competent authority shall establish documented procedures detailing how compliance with this Annex (Part 66) is accomplished. These procedures shall be reviewed and amended to ensure continued compliance.~~

66.B.10 Management system

(a) The competent authority shall establish and maintain a management system, including as a minimum:

- (1) documented policies and procedures to describe its organisation, means and methods to achieve compliance with Regulation (EC) No 216/2008 and its Implementing Rules. The procedures shall be kept up to date, and serve as the basic working documents within that competent authority for all related tasks;
- (2) a sufficient number of personnel to perform its tasks and discharge its responsibilities. A system shall be in place to plan the availability of personnel in order to ensure the proper completion of all tasks;
- (3) personnel qualified to perform their allocated tasks and have the necessary knowledge, experience, initial and recurrent training to ensure continuing competence;
- (4) adequate facilities and office accommodation to perform the allocated tasks;
- (5) a function to monitor compliance of the management system with the relevant requirements and adequacy of the procedures including the establishment of an internal audit process and a safety risk management process. Compliance monitoring shall include a feedback system of audit findings to the senior management of the competent authority to ensure implementation of corrective actions as necessary; and
- (6) a person or group of persons, ultimately responsible to the senior management of the competent authority for the compliance monitoring function.

(b) The competent authority shall, for each field of activity, including management system, appoint one or more persons with the overall responsibility for the management of the relevant task(s).

The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance with other competent authorities concerned, including all findings raised and follow-up actions taken as a result of oversight of persons and organisations exercising activities in the territory of a Member State, but certified by the competent authority of another Member State or the Agency.

- (d) A copy of the procedures related to the management system and their amendments shall be made available to the Agency for the purpose of standardisation.

AMC1 66.B.10 Management system

GENERAL

- (a) All of the following should be considered when deciding upon the required organisational structure:
- (1) the number of certificates, attestations, authorisations and approvals to be issued;
 - (2) the number of certified persons and organisations exercising an activity within that Member State, including persons or organisations certified by other competent authorities;
 - (3) the possible use of qualified entities and of resources of other competent authorities to fulfil the continuing oversight obligations;
 - (4) the level of civil aviation activity in terms of:
 - (i) number and complexity of aircraft;
 - (ii) size and complexity of the Member State's aviation industry;
 - (5) the potential growth of activities in the field of civil aviation.
- (b) The set-up of the organisational structure should ensure that the various tasks and obligations of the competent authority do not solely rely on individuals. A continuous and undisturbed fulfilment of these tasks and obligations of the competent authority should also be guaranteed in case of illness, accident or leave of individual employees.

GM1 66.B.10 Management system

- (a) The competent authority designated by each Member State should be organised in such a way that:
- (1) there is specific and effective management authority in the conduct of all relevant activities;
 - (2) the functions and processes described in the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, and AMCs, Certification Specifications (CSs), and Guidance Material (GM) may be properly implemented;
 - (3) the competent authority's organisation and operating procedures for the implementation of the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules are properly documented and applied;
 - (4) all competent authority personnel involved in the related activities are provided with training where necessary;
 - (5) specific and effective provision is made for the communication and interface as necessary with the Agency and the competent authorities of other Member States; and

- (6) all functions related to implementing the applicable requirements are adequately described.
- (b) A general policy in respect of activities related to the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules should be developed, promoted, and implemented by the manager at the highest appropriate level; for example, the manager at the top of the functional area of the competent authority that is responsible for such activities.
- (c) Appropriate steps should be taken to ensure that the policy is known and understood by all personnel involved, and all necessary steps should be taken to implement and maintain the policy.
- (d) The general policy, whilst also satisfying additional national regulatory responsibilities, should, in particular, take into account:
 - (1) the provisions of Regulation (EC) No 216/2008;
 - (2) the provisions of the applicable Implementing Rules and their AMCs, CSs, and GM;
 - (3) the needs of industry; and
 - (4) the needs of the Agency and of the competent authority.
- (e) The policy should define specific objectives for key elements of the organisation and processes for implementing related activities, including the corresponding control procedures and the measurement of the achieved standard.

AMC1 66.B.10(a)(1) Management system**DOCUMENTED POLICIES AND PROCEDURES**

- (a) The various elements of the organisation involved with the activities related to Regulation (EC) No 216/2008 and its Implementing Rules should be documented in order to establish a reference source for the establishment and maintenance of this organisation.
- (b) The documented procedures should be established in a way that facilitates their use. They should be clearly identified, kept up to date, and made readily available to all personnel involved in the related activities.
- (c) The documented procedures should cover, as a minimum, all of the following aspects:
 - (1) policy and objectives;
 - (2) organisational structure;
 - (3) responsibilities and associated authority;
 - (4) procedures and processes;
 - (5) internal and external interfaces;
 - (6) internal control procedures;
 - (7) training of personnel;
 - (8) cross references to associated documents; and
 - (9) assistance from other competent authorities or the Agency (where required).
- (d) It is likely that the information is held in more than one document or series of documents, and suitable cross-referencing should be provided. For example, organisational structure

and job descriptions are not usually in the same documentation as the detailed working procedures. In such cases, it is recommended that the documented procedures include an index of cross references to all such other related information, and the related documentation should be readily available when required.

GM1 66.B.10(a)(2) Management system**SUFFICIENT PERSONNEL**

- (a) This GM on the determination of the required personnel is limited to the performance of certification and oversight tasks, excluding personnel required to perform tasks subject to any national regulatory requirements.
- (b) The elements to be considered when determining required personnel and planning their availability may be divided into quantitative and qualitative elements:
 - (1) Quantitative elements:
 - (i) the estimated number of initial certificates to be issued;
 - (ii) the number of persons to whom the competent authority has issued a licence, certificate, rating, authorisation or attestation; and
 - (iii) the estimated number of persons exercising their activity within the territory of the Member State and established or residing in another Member State.
 - (2) Qualitative elements:
 - (i) the size, nature, and complexity of activities of certified organisations, taking into account:
 - (A) privileges of the organisation;
 - (B) type of approval, scope of approval;
 - (C) possible certification to industry standards;
 - (D) number of personnel; and
 - (E) organisational structure, existence of subsidiaries;
 - (ii) the safety priorities identified;
 - (iii) the results of past oversight activities, including audits, inspections and reviews, in terms of risks and regulatory compliance, taking into account:
 - (A) number and level of findings;
 - (B) timeframe for implementation of corrective actions; and
 - (C) maturity of management systems implemented by organisations, and their ability to effectively manage safety risks; and
 - (iv) the size and complexity of the Member State's aviation industry, and the potential growth of activities in the field of civil aviation which may be an indication of the number of new applications, and changes to existing certificates to be expected.
- (c) Based on existing data from previous oversight planning cycles, and taking into account the situation within the Member State's aviation industry, the competent authority may estimate:

- (1) the standard working time required for processing applications for new certificates;
 - (2) the number of new certificates to be issued for each planning period; and
 - (3) the number of changes to existing certificates to be processed for each planning period.
- (d) In line with the competent authority's oversight policy, the following planning data should be determined:
- (1) standard number of audits to be performed per oversight planning cycle;
 - (2) standard duration of each audit;
 - (3) standard working time for audit preparation, on-site audit, reporting, and follow-up, per inspector;
 - (4) standard number of unannounced inspections to be performed;
 - (5) standard duration of inspections, including preparation, reporting, and follow-up, per inspector; and
 - (6) minimum number and required qualification of inspectors for each audit/inspection.
- (e) Standard working time could be expressed either in working hours per inspector, or in working days per inspector. All planning calculations should, then, be based on the same unit (hours or working days).
- (f) It is recommended to use a spreadsheet application to process data defined under (c) and (d), to assist in determining the total number of working hours/days per oversight planning cycle required for certification, oversight, and enforcement activities. This application could also serve as a basis for implementing a system for planning the availability of personnel.
- (g) The number of working hours/days per planning period for each qualified inspector that may be allocated for certification, oversight and enforcement activities should be determined, taking into account:
- (1) purely administrative tasks not directly related to certification and oversight;
 - (2) training;
 - (3) participation in other projects;
 - (4) planned absence; and
 - (5) the need to include a reserve for unplanned tasks or unforeseeable events.
- (h) The determination of working time available for certification, oversight, and enforcement activities should also consider:
- (1) the possible use of qualified entities;
 - (2) possible cooperation with other competent authorities for approvals involving more than one Member State; and
 - (3) oversight activities under a bilateral aviation safety agreement.
- (i) Based on the elements listed above, the competent authority should be able to:
- (1) monitor dates when audits and inspections are due, and when they have been carried out;

- (2) implement a system to plan the availability of personnel; and
- (3) identify possible gaps between the number and qualification of personnel and the required volume of certification and oversight.

Care should be taken to keep planning data up to date in line with changes in the underlying planning assumptions, with particular focus on risk-based oversight principles.

AMC1 66.B.10(a)(3) Management system

QUALIFICATION AND TRAINING — GENERAL

- (a) The competent authority should ensure appropriate and adequate training of its personnel to meet the standard that is considered necessary to perform the work. To ensure personnel remain qualified, arrangements should be made for initial and recurrent training as required.
- (b) The basic capability of the competent authority's personnel is a matter of recruitment, and normal management functions in selection of personnel for particular duties. Moreover, the competent authority should provide training in the basic skills as required for those duties. However, to avoid differences in understanding and interpretation, all personnel should be provided with further training specifically related to Regulation (EC) No 216/2008, its Implementing Rules and related AMCs, CSs, and GM, as well as related to the assessment of alternative means of compliance.
- (c) The competent authority may provide training through its own training organisation with qualified trainers, or through another qualified training source.
- (d) When training is not provided through an internal training organisation, adequately experienced and qualified persons may act as trainers, provided their training skills have been assessed. If required, an individual training plan should be established covering specific training skills. Records should be kept of such training, and of the assessment, as appropriate.

AMC2 66.B.10(a)(3) Management system

QUALIFICATION AND TRAINING — INSPECTORS

- (a) Competent authority inspectors should have:
 - (1) practical experience and expertise in the application of aviation safety standards and safe operating practices;
 - (2) comprehensive knowledge of:
 - (i) relevant parts of implementing rules, certification specifications, and guidance material;
 - (ii) the competent authority's procedures;
 - (iii) the rights and obligations of an inspector;
 - (iv) quality and safety management systems;
 - (v) continuing airworthiness management; and
 - (vi) maintenance related human factors and human performance principles;
 - (3) training on auditing techniques and assessing and evaluating safety management

systems;

- (4) five years relevant work experience to be allowed to work as an inspector independently. This may include experience gained during training to obtain the qualification referred to in (a)(5);
 - (5) a relevant engineering degree or an aircraft maintenance technician qualification with additional education. 'Relevant engineering degree' means an engineering degree from aeronautical, mechanical, electrical, electronic, avionic, or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components;
 - (6) knowledge of a relevant sample of aircraft types; and
 - (7) knowledge of maintenance training standards.
- (b) In addition to technical competency, inspectors should have a high degree of integrity, be impartial in carrying out their tasks, be tactful, and have a good understanding of human nature.
- (c) A programme for recurrent training should be developed that ensures that the inspectors remain competent to perform their allocated tasks.

AMC3 66.B.10(a)(3) Management system

INITIAL AND RECURRENT TRAINING

(a) Initial training programme:

The initial training programme for inspectors should include, as appropriate to their role, current knowledge, experience and skills in, at least, all of the following:

- (1) aviation legislation, organisation, and structure;
- (2) the Chicago Convention, relevant ICAO annexes and documents;
- (3) the applicable requirements and procedures;
- (4) management systems, including auditing, risk assessment, and reporting techniques;
- (5) Safety Management Systems, and the evaluation of such systems;
- (6) human factors principles;
- (7) rights and obligations of inspecting personnel of the competent authority;
- (8) 'on-the-job' training; and
- (9) suitable technical training appropriate to the role and tasks of the inspector, in particular for those areas requiring approvals.

(b) Recurrent training programme:

The recurrent training programme should reflect, at least, changes in aviation legislation and industry. The programme should also cover the specific needs of the inspectors and the competent authority and significant issues identified by the State Safety Programme or the European Aviation Safety plan (EASp).

AMC4 66.B.10(a)(3) Management system

COMPETENCE ASSESSMENT

The competent authority should periodically assess the competence of its inspectors. The results of such assessment, as well as any actions taken following such assessment, should be recorded.

AMC1 66.B.10(d) Management system**PROCEDURES AVAILABLE TO THE AGENCY**

- (a) Copies of the procedures related to the competent authority's management system, and their amendments to be made available to the Agency for the purpose of standardisation should provide, at least, the following information:
- (1) Regarding continuing oversight functions undertaken by the competent authority, the competent authority's organisational structure with description of the main processes. This information should demonstrate the allocation of responsibilities within the competent authority, and that the competent authority is capable of carrying out the full range of tasks regarding the size and complexity of the Member State's aviation industry. It should also consider overall proficiency and authorisation scope of competent authority personnel;
 - (2) For personnel involved in oversight activities, the minimum professional qualification requirements and experience and principles guiding appointment (e.g. assessment);
 - (3) How the following are carried out: assessing applications and evaluating compliance, issuance of certificates, performance of continuing oversight, follow-up of findings, enforcement measures, and resolution of safety concerns;
 - (4) Principles of managing exemptions and derogations;
 - (5) Processes in place to disseminate applicable safety information for timely reaction to a safety problem;
 - (6) Criteria for planning continuing oversight (oversight programme), including adequate management of interfaces when conducting continuing oversight (air operations, continuing airworthiness management for example); and
 - (7) Outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for continuation training of oversight personnel.
- (b) As part of the continuous monitoring of a competent authority, the Agency may request details of the working methods used, in addition to the copy of the procedures of the competent authority's management system (and amendments). These additional details are the procedures and related guidance material describing working methods for competent authority personnel conducting oversight.
- (c) Information related to the competent authority's management system may be submitted in electronic format.

66.B.12 Allocation of tasks to qualified entities

- (a) Tasks related to the initial certification, or continuing oversight of persons, or organisations subject to Regulation (EC) No 216/2008 and its Implementing Rules shall be allocated by Member States only to qualified entities. When allocating tasks, the competent authority shall ensure that it has:
- (1) put a system in place to initially and continuously assess that the qualified entity

complies with Annex V to Regulation (EC) No 216/2008.

This system and the results of the assessments shall be documented;

(2) established a documented agreement with the qualified entity, approved by both parties at the appropriate management level, which clearly defines:

- (i) the tasks to be performed;
- (ii) the declarations, reports, and records to be provided;
- (iii) the technical conditions to be met in performing such tasks;
- (iv) the related liability coverage; and
- (v) the protection given to information acquired in carrying out such tasks.

(b) The competent authority shall ensure that the internal audit process and safety risk management process required by 147.B.200(a)(4) covers all certification, or continuing oversight tasks performed on its behalf.

GM1 66.B.12 Allocation of tasks to qualified entities

CERTIFICATION TASKS

The tasks that may be performed by a qualified entity on behalf of the competent authority include those related to the initial certification and continuing oversight of persons and organisations as defined in this Regulation, with the exclusion of the issuance of certificates, licences, ratings, or approvals.

66.B.14 Changes in the management system

- (a) The competent authority shall have a system in place to identify changes that affect its capability to perform its tasks and discharge its responsibilities as defined in Regulation (EC) No 216/2008 and its Implementing Rules. This system shall enable it to take action as appropriate to ensure that its management system remains adequate and effective.
- (b) The competent authority shall update its management system to reflect any change to Regulation (EC) No 216/2008 and its Implementing Rules in a timely manner, so as to ensure effective implementation.
- (c) The competent authority shall notify the Agency of changes affecting its capability to perform its tasks and discharge its responsibilities as defined in Regulation (EC) No 216/2008 and its Implementing Rules.

~~66.B.20—Record-keeping~~

- ~~(a) The competent authority shall establish a system of record-keeping that allows adequate traceability of the process to issue, revalidate, change, suspend or revoke each aircraft maintenance licence.~~
- ~~(b) These records shall include for each licence:~~
 - ~~1. the application for an aircraft maintenance licence or change to that licence, including all supporting documentation;~~
 - ~~2. a copy of the aircraft maintenance licence including any changes;~~
 - ~~3. copies of all relevant correspondence;~~
 - ~~4. details of any exemption and enforcement actions;~~

- ~~5. any report from other competent authorities relating to the aircraft maintenance licence holder;~~
- ~~6. the records of examinations conducted by the competent authority;~~
- ~~7. the applicable conversion report used for conversion;~~
- ~~8. the applicable credit report used for crediting.~~
- ~~(c) Records referred to in points 1 to 5 of point (b) shall be kept at least five years after the end of the licence validity.~~
- ~~(d) Records referred to in points 6, 7 and 8 of point (b) shall be kept for an unlimited period.~~

66.B.20 Record keeping

- (a) The competent authority shall establish a system of record keeping that allows adequate storage, accessibility, and reliable traceability of:
 - (1) the competent authority's management system's documented policies and procedures;
 - (2) training, qualification, and authorisation of competent authority personnel;
 - (3) the allocation of tasks, covering the elements required by 147.B.205 as well as the details of tasks allocated;
 - (4) certification processes, and continuing oversight of certified organisations;
 - (5) processes for issuing personnel licences, ratings, certificates, and attestations, and for the continuing oversight of the holders of those licences, ratings, certificates, and attestations, including:
 - (i) the application for an aircraft maintenance licence or change to that licence, including all supporting documentation;
 - (ii) a copy of the aircraft maintenance licence including any changes;
 - (iii) copies of all relevant correspondence;
 - (iv) details of any enforcement actions;
 - (v) any report from other competent authorities relating to the aircraft maintenance licence holder;
 - (vi) the records of examinations conducted by the competent authority;
 - (vii) the applicable conversion report used for conversion;
 - (viii) the applicable credit report used for crediting; and
 - (ix) details of exemptions granted in accordance with Article 14.4 of Regulation (EC) No 216/2008.
 - (6) the evaluation and notification to the Agency of alternative means of compliance proposed by organisations, and the assessment of alternative means of compliance used by the competent authority itself.
 - (7) the use of flexibility provisions in accordance with Article 14 of Regulation (EC) No 216/2008.
- (b) The competent authority shall maintain a list of all organisation certificates and personnel

licences, certificates, and attestations it issued.

- (c) Subject to applicable data protection law, retention periods shall be:
- (1) a minimum of four years for the records referred to in points (a)(1) to (a)(4);
 - (2) a minimum of five years after the end of the licence validity for the records referred to in point (a)(5) items (a) to (e);
 - (3) unlimited for the records referred to in to in point (a)(5) items (f) to (i).

AMC 66.B.20—Record keeping

1. ~~The record keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organized in a consistent way throughout the competent authority (chronological, alphabetical order, etc.).~~
2. ~~All records containing sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure confidentiality of this kind of data.~~
3. ~~All computer hardware used to ensure data backup should be stored in a different location from that containing the working data in an environment that ensures they remain in good condition. When hardware or software changes take place special care should be taken that all necessary data continues to be accessible at least through the full period specified in 66.B.20.~~

AMC1 66.B.20(a) Record keeping

- (a) The record keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a consistent way that ensures traceability and retrievability throughout the required retention period.
- (b) All records containing sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure confidentiality of this kind of data.
- (c) Records should be kept in paper form, or in electronic format, or a combination of both media. Records stored on microfilm or optical disc form are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period starts when the record has been created.
- (d) Paper systems should use robust material, which can withstand normal handling and filing. Computer systems should have, at least, one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against unauthorised alteration of data.
- (e) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data, in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken to ensure that all necessary data continue to be accessible at least through the full period specified in 147.B.220.

AMC1 66.B.20(a)(1) Record keeping

COMPETENT AUTHORITY MANAGEMENT SYSTEM

Records related to the competent authority's management system should include, as a minimum and as applicable:

- (a) the documented policies and procedures;
- (b) the personnel files of competent authority personnel, with supporting documents related to training and qualifications;
- (c) the results of the competent authority's internal audit and safety risk management processes, including audit findings, corrective and preventive actions; and
- (d) the contract(s) established with qualified entities performing certification or oversight tasks on behalf of the competent authority.

AMC1 66.B.20(a)(5) Record-keeping**PERSONS**

Records related to personnel licences, certificates, ratings, authorisations or attestations issued by the competent authority should include, as a minimum:

- (a) the application for a licence, certificate, rating, authorisation or attestation or change to a licence, certificate, rating, authorisation or attestation;
- (b) documentation in support of the application for a licence, certificate, rating, authorisation or attestation or change to a licence, certificate, rating, authorisation or attestation, covering as applicable:
 - (1) theoretical examination(s);
 - (2) skill test(s);
 - (3) proficiency check(s); and
 - (4) certificates attesting required experience.
- (c) a copy of the licence or certificate including any changes;
- (d) all relevant correspondence or copies thereof;
- (e) details of any exemption;
- (f) details of any enforcement action(s); and
- (g) any report from other competent authorities relating to personnel licences, certificates, ratings, authorisations or attestations issued by the competent authority.

GM1 66.B.20 Record keeping**GENERAL**

Records are required to document results achieved, or to provide evidence of activities performed. Records become factual when recorded. Therefore, they are not subject to version control. Even when a new record is produced covering the same issue, the previous record remains valid.

66.B.25 Mutual exchange of information

- ~~(a) In order to implement the requirement of this Regulation, the competent authorities shall participate in a mutual exchange of information in accordance with Article 15 of Regulation (EC) No 216/2008.~~

- (b) Without prejudice to the competencies of the Member States, in the case of a potential safety threat involving several Member States, the concerned competent authorities shall assist each other in carrying out the necessary oversight action.

66.B.30 Exemptions

~~All exemptions granted in accordance with Article 14.4 of Regulation (EC) No 216/2008 shall be recorded and retained by the competent authority.~~

66.B.30 Information to the Agency

The competent authority shall without undue delay notify the Agency in case of any significant problems with the implementation of Regulation (EC) No 216/2008 and its Implementing Rules.

66.B.35 Oversight documentation

The competent authority shall provide all legislative acts, standards, rules, technical publications, and related documents to relevant personnel in order to allow them to perform their tasks and to discharge their responsibilities.

APPENDIX I

BASIC KNOWLEDGE REQUIREMENTS

MODULE 9A — HUMAN FACTORS

Note: This module does not apply to category B3. Relevant subject matters for category B3 are defined in module 9B.

	Level		
	A	B1	B2
9.1 General The need to take human factors into account; Incidents attributable to human factors / human error; 'Murphy's law'.	1 2	2	2
9.2 Human Performance and Limitations Vision; Hearing; Information processing; Attention and perception; Memory; Claustrophobia and physical access.	1 2	2	2
9.3 Social Psychology	1	1	1
Accountability and Responsibility: individual and group;			
Motivation and de-motivation;			
Peer pressure;			
'Culture' issues;			
Team working;			
Management, supervision, and leadership.			
9.4 Factors Affecting Performance	2	2	2
Fitness/health;			
Stress: domestic and work related;			
Time pressure and deadlines;			
Workload: overload and underload;			
Sleep and fatigue, shiftwork;			
Alcohol, medication, drug abuse.			
9.5 Physical Environment	1	1	1
Noise and fumes;			
Illumination;			
Climate and temperature;			
Motion and vibration;			
Working environment.			
9.6 Tasks	1	1	1
Physical work;			

	Level		
	A	B1	B2
Repetitive tasks;			
Visual inspection;			
Complex systems.			
9.7 Communication	2	2	2
Within and between teams;			
Work logging and recording;			
Keeping up to date, currency;			
Dissemination of information.			
9.8 Human Error	1 2	2	2
Error models and theories;			
Types of errors in maintenance tasks;			
Implications of errors (i.e. accidents);			
Organisational errors;			
Avoiding and managing errors.			
9.9 Hazards in the Workplace	1	2	2
Recognising and avoiding hazards;			
Dealing with emergencies.			
9.9 Safety Management	2	2	2
Risk Management			
Occurrence Reporting			
Safety Culture			
Just Culture			
Identifying, avoiding and reporting hazards			
Dealing with emergencies			

MODULE 9B. HUMAN FACTORS

Note: The scope of this module shall reflect the less demanding environment of maintenance for B3 licence holders.

Items 9.3 and 9.9 are changed as follows:

9.3 Social Psychology	1
Accountability and Responsibility: individual and group;	
Motivation and de-motivation;	
Peer pressure;	
'Culture' issues;	
Team working;	
Management, supervision, and leadership.	
9.9 Hazards in the Workplace	1
Recognising and avoiding hazards;	
Dealing with emergencies.	
9.9 Safety Management	1-2
Risk Management	
Occurrence Reporting	
Safety Culture	
Just Culture	
Identifying, avoiding and reporting hazards	
Dealing with emergencies	

Draft Opinion /Decision — ANNEX IV (Part-147)

The text of the amendment is arranged to show deleted text, new text or new paragraph as shown below:

1. Deleted text is shown with a strike through: ~~deleted~~.
2. New text is highlighted with grey shading: **new**.
3. [...] indicates that remaining text is unchanged in front of or following the reflected amendment.
4. When only certain elements of the rule, AMC, or GM are amended, this is specified (e.g. '*Point 3 of the AMC is amended as below.*'). If no indication is provided, the integral text of the rule, AMC, or GM is included.
5. In order to facilitate processing and consultation, all new and amended AMCs and GM have been included directly after the corresponding rule.

CONTENTS

147.1

SECTION A - TECHNICAL REQUIREMENTS

SUBPART A GENERAL

147.A.05 Scope

147.A.10 General

147.A.15 Application for an organisation certificate

147.A.20 Terms of approval

SUBPART B ORGANISATIONAL REQUIREMENTS

147.A.100 Facility requirements

147.A.105 Personnel requirements

147.A.110 Records of instructors, examiners and assessors

147.A.115 Instructional equipment

147.A.120 Maintenance training material

147.A.125 Records of training, examination and assessment

147.A.130 Training procedures and quality system Management system

147.A.131 Training, examination and assessment procedures

147.A.132 Management system record keeping

147.A.133 Contracted activities

147.A.135 Examinations

147.A.140 Maintenance training organisation exposition

147.A.145 Privileges of the maintenance training organisation

147.A.148 Means of compliance

147.A.150 Changes to the maintenance training organisation

147.A.155 Continued validity

147.A.157 Access

147.A.160 Findings

147.A.170 Immediate reaction to a safety problem

SUBPART C THE APPROVED BASIC TRAINING COURSE

147.A.200 The approved basic training course

147.A.205 Basic knowledge examinations

147.A.210 Basic practical assessment

SUBPART D AIRCRAFT TYPE / TASK TRAINING

147.A.300 Aircraft type/task training

147.A.305 Aircraft type examinations and task assessments

SECTION B PROCEDURE FOR COMPETENT AUTHORITIES**SUBPART A GENERAL**

147.B.105 Scope

~~147.B.10 Competent authority~~

147.B.115 Oversight documentation

~~147.B.15 Acceptable means of compliance~~

147.B.120 Means of compliance

147.B.125 Information to the Agency

147.B.135 Immediate reaction to a safety problem

~~147.B.20 Record-keeping~~

~~147.B.25 Exemptions~~

SUBPART B MANAGEMENT SYSTEM

147.B.200 Management system

147.B.205 Allocation of tasks to qualified entities

147.B.210 Changes in the management system

147.B.220 Record keeping

SUBPART B ISSUE OF AN APPROVAL**SUBPART C OVERSIGHT, CERTIFICATION AND ENFORCEMENT**

147.B.300 Oversight principles

147.B.305 Oversight programme

147.B.310 Initial certification procedure

147.B.330 Changes

147.B.350 Findings and corrective actions

147.B.355 Suspension, limitation and revocation

~~147.B.110 Procedure for approval and changes to the approval~~

~~147.B.120 Continued validity procedure~~

~~147.B.125 Maintenance training organisation approval certificate~~

~~147.B.130 Findings~~

SUBPART C REVOCATION, SUSPENSION AND LIMITATION OF THE MAINTENANCE TRAINING ORGANISATION APPROVAL

~~147.B.200 Revocation, suspension and limitation of the maintenance training organisation approval~~

Appendix I - Basic Training Course Duration

Appendix II - Maintenance Training and Examination Organisation Certificate Approval referred to in Annex IV (Part-147) - EASA Form 11

Appendix III - Certificates of Recognition referred to in Annex IV (Part-147) - EASA Forms 148 and 149

SECTION A

SUBPART A

GENERAL

AMC 147.1

~~A competent authority may be a ministry, a national aviation authority, or any aviation body designated by the Member State and located within that Member State. A Member State may designate more than one competent authority to cover different areas of responsibility, as long as the designation decision contains a list of the competencies of each authority and there is only one competent authority responsible for each given area.~~

147.A.15 Application for an organisation certificate

- ~~(a) An application for an approval or for the change of an existing approval shall be made on a form and in a manner established by the competent authority.~~
- ~~(b) An application for an approval or change to an approval shall include the following information:~~
 - ~~(1) the registered name and address of the applicant,~~
 - ~~(2) the address of the organisation requiring the approval or change to the approval,~~
 - ~~(3) the intended scope of approval or change to the scope of approval,~~
 - ~~(4) the name and signature of the accountable manager,~~
 - ~~(5) the date of application.~~
- (a) The application for an organisation certificate or an amendment to an existing certificate shall be made in a form and manner established by the competent authority, taking into account the applicable requirements of this Regulation.
- (b) Applicants for an initial certificate shall provide the competent authority with documentation demonstrating how they will comply with the requirements established in this Regulation. Such documentation shall include a procedure describing how changes not requiring prior approval will be managed and notified to the competent authority.

AMC1 147.A.15 Application for an organisation certificate

The application form should contain the information required in the EASA Form 12.

147.A.20 Terms of approval

The organisation shall specify the scope of work deemed to constitute approval in its exposition.

SUBPART B

ORGANISATIONAL REQUIREMENTS

147.A.100 Facility requirements

- (a) The size and structure of facilities shall ensure protection from the prevailing weather elements and proper operation of all planned training and examination on any particular day.
- (b) Fully enclosed appropriate accommodation separate from other facilities shall be provided for the instruction of theory and the conduct of knowledge examinations.
 - (1) The maximum number of students undergoing knowledge training during any training course shall not exceed 28.
 - (2) The size of accommodation for examination purposes shall be such that no student can read the paperwork or computer screen of any other student from his/her position during examinations.
- (c) The paragraph (b) accommodation environment shall be maintained such that students are able to concentrate on their studies or examination as appropriate, without undue distraction or discomfort.
- (d) In the case of a basic training course, basic training workshops and/or maintenance facilities separate from training classrooms shall be provided for practical instruction appropriate to the planned training course. If, however, the organisation is unable to provide such facilities, arrangements may be made with another organisation to provide such workshops and/or maintenance facilities, in which case a written agreement shall be made with such organisation specifying the conditions of access and use thereof. ~~The competent authority shall require access to any such contracted organisation and the written agreement shall specify this access.~~ Such written agreement shall clearly state that the competent authority has a right of access to the contracted organisation as specified in 147.A.157.
- (e) In the case of an aircraft type/task training course, access shall be provided to appropriate facilities containing examples of aircraft type as specified in 147.A.115(d).
- (f) The maximum number of students undergoing practical training during any training course shall not exceed 15 per supervisor or assessor.
- (g) Office accommodation shall be provided for instructors, knowledge examiners, and practical assessors of a standard to ensure that they can prepare for their duties without undue distraction or discomfort.
- (h) Secure storage facilities shall be provided for examination papers and training records. The storage environment shall be such that documents remain in good condition for the retention period as specified in 147.A.125. The storage facilities and office accommodation may be combined, subject to adequate security.
- (i) A library shall be provided containing all technical material appropriate to the scope and level of training undertaken.

147.A.105 Personnel requirements

- (a) The organisation shall appoint an accountable manager who has corporate authority for ensuring that all training commitments can be financed and carried out to the standard required by this Regulation Part.
- (b) The organisation shall nominate ~~A~~ a person or group of persons, whose responsibilities include ensuring that the maintenance training organisation ~~is in compliance with~~ complies with the requirements of this Part, ~~shall be nominated~~. Such person(s) ~~must be~~ shall ultimately be responsible to the accountable manager. The senior person or one person from the group of persons may also be the accountable manager subject to meeting the requirements for the accountable manager as defined in paragraph (a).
- (1) The person or group of persons nominated shall represent the management structure of the organisation and be responsible for all functions specified in this Part.
- ~~(2) The person or group of persons nominated shall be identified and their credentials submitted in a form and manner established by the competent authority.~~
- ~~(3)~~ (2) The person or group of persons nominated shall be able to demonstrate relevant knowledge, background and satisfactory experience related to maintenance training.
- (c) The accountable manager under paragraph (a) shall appoint a person with responsibility for compliance monitoring, including the associated feedback system as required by 147.A.130(a)(6). The appointed person shall have direct access to the accountable manager to ensure that the accountable manager is kept properly informed on compliance matters.
- ~~(e)~~ (d) The maintenance training organisation shall have ~~contract~~ sufficient staff to plan/perform knowledge and practical training, conduct knowledge examinations and practical assessments in accordance with the approval.
- ~~(d)~~ (e) By derogation to paragraph ~~(e)~~ (d), when another organisation is used to provide practical training and assessments, such other organisation's staff may be nominated to carry out practical training and assessments.
- ~~(e)~~ (f) Any person may carry out any combination of the roles of instructor, knowledge examiner and assessor, subject to compliance with paragraph ~~(f)~~ (g).
- ~~(f)~~ (g) The organisation shall establish experience and qualification criteria for ~~experience and qualifications of~~ instructors, knowledge examiners and practical assessors ~~shall be established~~ in accordance with criteria published or in accordance with a procedure and to a standard agreed by the competent authority. The organisation shall verify the experience and qualification of potential instructors, knowledge examiners and practical assessors and when satisfied with the assessment it shall authorise them in writing, specifying the scope and limits of the authorisation.
- ~~(g)~~ (h) The knowledge examiners and practical assessors shall be specified in the maintenance training organisation exposition for the acceptance of such staff by the competent authority.
- ~~(h)~~ (i) Instructors and knowledge examiners shall undergo ~~updating~~ recurrent training at least once every 24 calendar months relevant to current technology, practical skills, safety management and human factors and the latest training techniques appropriate to the knowledge being trained or examined.

AMC1 147.A.105(b);(c) Personnel requirements**APPOINTMENT OF PERSONNEL**

- (a) ~~1.~~ The larger maintenance training organisation (an organisation with the capacity to provide training for 50 students or more **at the same time**) should appoint a training manager with the responsibility of managing the training organisation on a day-to-day basis. Such person could also be the accountable manager. In addition, the organisation should appoint ~~a quality manager with the responsibility of managing the quality system as specified in paragraph 147.A.130(b)~~ and an examination manager with the responsibility of managing the relevant Part-147 Subpart C or Subpart D examination system. Such person~~(s)~~ may also be an instructor and/or examiner.
- (b) ~~2.~~ The smaller maintenance training organisation (an organisation with the capacity to provide training for less than 50 students **at the same time**) may combine any or all of the sub-paragraph ~~(a)(1)~~ positions subject to the competent authority verifying and being satisfied that all functions can be properly carried out in combination.
- ~~3. When the organisation is also approved in accordance with against other Parts which contain some similar functions then such functions may be combined.~~

~~AMC 147.A.105 (b) Personnel requirements~~

- (c) With the exception of the accountable manager, an EASA Form 4 should be completed for each person nominated to hold a position required by 147.A.105(b) **and (c)**. The organisation may adopt different designations for such nominated person, as long as it documents how these relate to the relevant Part-147 designations. An example of an EASA Form 4 is included in Appendix II to AMCs.

AMC1 147.A.105(c) Personnel requirements**PERSON WITH RESPONSIBILITY FOR COMPLIANCE MONITORING**

The person appointed for compliance monitoring (compliance monitoring manager) should be able to demonstrate relevant knowledge, background, and appropriate experience related to the activities of the organisation, including knowledge and experience in compliance monitoring;

~~GM to AMC1 147.A.105 (e) (d) Personnel requirements~~**PERMANENT STAFF**

The maintenance training organisation should have a nucleus of ~~permanently employed~~ staff to undertake the minimum amount of maintenance training proposed but may contract, on a part-time basis, instructors for subjects which are only taught on an occasional basis.

~~GM to AMC1 147.A.105 (f) (g) Personnel requirements~~**TRAINING ON INSTRUCTIONAL TECHNIQUES**

~~It is recommended that p~~ Theoretical knowledge and practical training instructors **should** be trained in instructional techniques.

~~GM to AMC2 147.A.105(g) Personnel requirements~~**KNOWLEDGE EXAMINERS**

Knowledge examiners should demonstrate a clear understanding of the examination standard

required by Part-66 and have a responsible attitude to the conduct of examinations such that the highest integrity is ensured.

AMC1 147.A.105(h)(i) Personnel requirements

RECURRENT TRAINING

- (a) ~~Updating~~ Recurrent training should normally be of 35 hours duration minimum. It should but may be adjusted to the scope of training of the organisation and particular instructor/knowledge examiner.
- (b) Records should show for each instructor/knowledge examiner when the recurrent training was scheduled and when it took place.
- (c) The recurrent training may be subdivided into more than one element to be performed over the 24-month period and may include such activities as attendance at relevant lectures and symposiums.

~~GM to 147.A.105(h) Personnel requirements~~

- ~~1. Records should show for each instructor/examiner when the updating training was scheduled and when it took place.~~
- ~~2. The updating training may be subdivided during the 24 months into more than one element and may include such activities as attendance at relevant lectures and symposiums.~~

GM1 147.A.105(b) Personnel requirements

SENIOR PERSON

'Senior person' is intended to mean the person who manages the organisation and the processes within the organisation on a day-to day basis, ensuring compliance with the applicable requirements.

GM1 147.A.105(d) Personnel requirements

PERMANENT STAFF

The nucleus of permanent staff is normally determined on the basis of the annual training plan and must be consistent with the annual man hour plan. As a guideline, the organisation should be able to cover at least 50 % of the annual training man hours for the courses contained in the organisation's approval schedule with their permanent staff.

Procedures for contracting part-time basis instructors should be defined as part of the maintenance training organisation exposition and may require competent authority approval depending on the procedures agreed for the management of changes not requiring prior approval.

'Occasional basis' in relation to the contracting of staff should be understood as no more than once per year.

147.A.110 Records of instructors, examiners and assessors

- (a) The organisation shall maintain a record of all instructors, knowledge examiners and practical assessors. These records shall reflect the experience and qualification, training history and any subsequent training undertaken.
- (b) ~~Terms of~~ A formal authorisation reference shall be issued to ~~drawn up for~~ all instructors,

knowledge examiners and practical assessors.

AMC1 147.A.110 (a) Records of instructors, examiners and assessors**GENERAL**

- (a) ~~1.~~ The following minimum information relevant to the scope of activity should be kept on record in respect of each instructor, knowledge examiner and practical assessor:
- ~~(a)~~ (1) Name
 - ~~(b)~~ (2) Date of birth
 - ~~(c)~~ (3) Personnel number
 - ~~(d)~~ (4) Experience
 - ~~(e)~~ (5) Qualifications
 - ~~(f)~~ (6) Training history (before entry)
 - ~~(g)~~ (7) Subsequent training
 - ~~(h)~~ (8) ~~Scope of activity~~ Authorisation
 - ~~(i)~~ (9) Starting date of employment/contract
 - ~~(j)~~ (10) If appropriate – ending date of employment/contract.
- (b) ~~2.~~ The record may be kept in any format but should be under the control of the organisation's **compliance monitoring function** ~~quality system~~.
- (c) ~~3.~~ The organisation should strive to keep the number of **p** ~~Persons~~ authorised to access the system ~~should be maintained~~ at a minimum to ensure that records cannot be altered in an unauthorised manner **and** ~~or~~ that such confidential records **do not** become accessible to unauthorised persons.
- ~~4.~~ ~~The competent authority is an authorised person when investigating the records system for initial and continued approval or when the competent authority has cause to doubt the competence of a particular person.~~

AMC1 147.A.110(b) Records of instructors, examiners and assessors**AUTHORISATION**

- (a) As a minimum, the authorisation should contain the following data:
- (1) Name;
 - (2) Date of birth;
 - (3) Personnel number;
 - (4) The name of organisation issuing the authorisation;
 - (5) Status of the instructor - permanent or contracted;
 - (6) Date of issue and validity of the authorisation;
 - (7) Authorisation type: theoretical instructor, practical instructor, knowledge examiner, practical assessor, or any combination of the functions;
 - (8) Scope of authorisation: modules/submodules for basic training, ATA chapters/subjects for type training courses;

- (9) Limitations, if any, and;
- (10) Aircraft type(s), as appropriate.
- (b) The organisation should provide instructors, knowledge examiners and practical assessors with a copy of their authorisation.

GM to 147.A.110—Records of instructors, examiners and assessors

Instructors, knowledge examiners and practical assessors should be provided with a copy of their terms of reference.

GM1 147.A.110 Records of instructors, examiners, and assessors**AUTHORISED PERSON**

The competent authority is an authorised person when investigating the records system for initial certification and continuing oversight or when the competent authority has cause to doubt the competence of a particular person.

147.A.115 Instructional equipment

- (a) Each classroom shall have appropriate presentation equipment of a standard that ensures students can easily read presentation text/drawings/diagrams and figures from any position in the classroom.

Presentation equipment shall include representative ~~synthetic training devices~~ **Simulation Training Devices (STDs)** to assist students in their understanding of the particular subject matter where such devices are considered beneficial for such purposes.
- (b) The basic training workshops and/or maintenance facilities as specified in 147.A.100(d) must have all tools and equipment necessary to perform the approved scope of training.
- (c) The basic training workshops and/or maintenance facilities as specified in 147.A.100(d) must have **access to** an appropriate selection of aircraft, engines, aircraft **components parts** and avionics equipment.
- (d) The aircraft type training organisation as specified in 147.A.100(e) must have access to the appropriate aircraft type. ~~Synthetic training devices~~ **STDs** may be used when such ~~synthetic training devices~~ **STDs** ensure adequate training standards.

AMC1 147.A.115(c);(d) Instructional equipment**ACCESS**

'Access' to instructional equipment may be arranged, in conjunction with the facilities requirement of 147.A.100(d) and 147.A.100(e), through an agreement with another organisation to provide such workshops, maintenance facilities, components, and/or aircraft types, as appropriate.

AMC GM 1 147.A.115(c) Instructional equipment**APPROPRIATE SELECTION OF AIRCRAFT, ENGINES, AIRCRAFT COMPONENTS, AND AVIONICS EQUIPMENT**

- (a) ~~1.~~ An appropriate selection of aircraft **components parts** means appropriate in relation to the particular subject module or sub-module of Part-66 being instructed. For example the turbine engine module should require the provision of sufficient **components parts** from

different types of turbine engine to show what such components parts look like, what the critical areas are from a maintenance viewpoint and to enable disassembly/assembly exercises to be completed.

(b)2. Appropriate aircraft, engines, aircraft components parts and avionics equipment means appropriate in relation to the particular subject module or sub-module of Part-66 being instructed. For example category B2 avionics training should require amongst other equipment, access to at least one type of installed autopilot and flight director system such that maintenance and system functioning can be observed and therefore more fully understood by the student in the working environment.

3. ~~"Access" may be interpreted to mean, in conjunction with the facilities requirement of 147.A.100(d), that there may be an agreement with a maintenance organisation approved under Part 145 to access such parts, etc.~~

147.A.125 Records of training, examination, and assessment

The organisation shall keep all student training, examination and assessment records for an unlimited period.

AMC1 147.A.125 Records of training, examination, and assessment

GENERAL

- (a) The record may be kept in any format but should be under the control of the organisation's compliance monitoring function.
- (b) The record keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a way that ensures traceability and retrievability throughout the required retention period.
- (c) Records should be kept in paper form or in electronic format or a combination of both. Records stored on microfilm or optical disc format are also acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record has been created or last amended.
- (d) Paper systems should use robust material which can withstand normal handling and filing. Computer systems should have at least one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against the ability of unauthorised personnel to alter the data.
- (e) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data, and in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken that all necessary data continues to be accessible at least through the full period specified in the relevant requirement. In the absence of such indication, all records should be kept for a minimum period of 5 years.
- (f) The organisation should strive to keep the number of persons authorised to access the system at a minimum to ensure that records cannot be altered in an unauthorised manner and that any confidential records do not become accessible to unauthorised persons.
- (g) In case the organisation ceases all training activities all student training, examination and assessment records should be transferred to the competent authority.

~~147.A.130 Training procedures and quality system~~

- ~~(a) The organisation shall establish procedures acceptable to the competent authority to ensure proper training standards and compliance with all relevant requirements in this Part.~~
- ~~(b) The organisation shall establish a quality system including:~~
- ~~(1) an independent audit function to monitor training standards, the integrity of knowledge examinations and practical assessments, compliance with and adequacy of the procedures, and~~
 - ~~(2) a feedback system of audit findings to the person(s) and ultimately to the accountable manager referred to in 147.A.105(a) to ensure, as necessary, corrective action.~~

147.A.130 Management system

- (a) The organisation shall establish, implement, and maintain a management system that includes:
- (1) clearly defined lines of responsibility and accountability throughout the organisation, including a direct safety accountability of the accountable manager;
 - (2) a description of the overall philosophies and principles of the organisation with regard to safety, referred to as the safety policy;
 - (3) the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation, and the management of associated risks, including taking actions to mitigate the risk and verify their effectiveness;
 - (4) maintaining personnel trained and competent to perform their safety management related duties and tasks;
 - (5) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending this documentation;
 - (6) a function to monitor compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure effective implementation of corrective actions as necessary; and
 - (7) any additional requirements that are prescribed in this Regulation.
- (b) The management system shall correspond to the size of the organisation, and the nature and complexity of its activities, taking into account the hazards and associated risks inherent in these activities.
- (c) Where the organisation holds one or more additional organisation certificates within the scope of Regulation (EC) 216/2008, the management system may be combined or integrated with that required under the additional certificate (s) held.

AMC1 147.A.130(a)(1);(2);(3);(5) Management system**GENERAL**

- (a) Safety risk management may be performed using hazard checklists, or similar risk management tools, or processes which are integrated into the activities of the organisation.
- (b) The organisation should manage safety risks related to a change. The management of

change should be a documented process to identify external and internal change that may have an adverse effect on safety. It should make use of the organisation's existing hazard identification, risk assessment, and mitigation processes.

- (c) The organisation should identify a person who fulfils the role of safety manager, and who is responsible for coordinating all safety management related processes and tasks. This person may be the accountable manager, or a person with an operational role in the organisation.
- (d) Within the organisation, responsibilities should be identified for hazard identification, risk assessment, and mitigation.
- (e) The safety policy should include a commitment to improve towards the highest safety standards, comply with all applicable legal requirements, meet all applicable standards, consider best practices, and provide appropriate resources.
- (f) The organisation should, in cooperation with other stakeholders, develop, coordinate, and maintain an emergency response plan (ERP) that ensures orderly and safe transition from normal to emergency operations, and return to normal operations. The ERP should provide the actions to be taken by the organisation or specified individuals in an emergency and reflect the size, nature, and complexity of the activities performed by the organisation.

GM1 147.A.130(a)(1) Management system

SAFETY ACCOUNTABILITY VERSUS RESPONSIBILITY

Safety responsibility can be delegated, i.e. cascaded down, within the scope of the defined job responsibilities, provided such delegation is documented. Safety accountability cannot be delegated. It defines the obligation of the responsible person to demonstrate the satisfactory discharge of his/her safety responsibilities. In order to ensure the needed safety awareness and commitment of all personnel involved in safety related tasks, it is recommended that safety accountabilities and responsibilities be clearly and comprehensively defined, documented, and communicated throughout the organisation.

GM2 147.A.130(a)(1) Management system

SAFETY MANAGER

- (a) Depending on the size of the organisation, and the nature, and complexity of its activities, the person fulfilling the role of safety manager may be assisted by additional safety personnel for the performance of all safety management related tasks.
- (b) Regardless of the organisational set-up, it is important that the person fulfilling the role of safety manager remains the unique focal point as regards the development, administration, and maintenance of the organisation's safety management system

GM1 147.A.130(a)(2) Management system

SAFETY POLICY

- (a) The safety policy is the means whereby the organisation states its intention to maintain and, where practicable, improve safety levels in all its activities, and to minimise its contribution to the risk of an aircraft accident as far as is reasonably practicable.
- (b) The safety policy should state that the purpose of safety reporting and internal investigations is to improve safety, not to apportion blame to individuals.

AMC1 147.A.130(a)(3) Management system**INTERNAL SAFETY REPORTING SCHEME**

- (a) As part of its management system, the organisation should establish an internal safety reporting scheme.
- (b) Through this scheme the organisation should:
- (1) identify and address the factors contributing to occurrences in order to reduce the likelihood of reoccurrence;
 - (2) identify adverse trends, corrective actions taken or to be taken by the organisation to address deficiencies; and
 - (3) ensure evaluation of all known relevant information relating to errors, near-misses and hazards, and a method to circulate the information as necessary.
- (c) The internal safety reporting scheme should be confidential and enable and encourage free and frank reporting of any potentially safety related occurrence, including incidents such as errors or near-misses, safety issues, and hazards identified. This will be facilitated by the establishment of a just culture. An organisation should ensure that personnel are not inappropriately punished for reporting or cooperating with occurrence investigations.
- The internal safety reporting scheme should contain the following elements:
- (1) clearly identified aims and objectives with demonstrable corporate commitment;
 - (2) a just culture policy and process identified and published;
 - (3) an investigation process to:
 - (i) identify those reports which require further investigation; and
 - (ii) establish all root causes, including any technical, organisational, managerial, or human factors issues, and any other contributing factors relating to the event; and
 - (4) appropriate corrective actions based on investigation findings.
- (d) The internal reporting scheme should:
- (1) assure confidentiality to the reporter;
 - (2) be closed-loop, to ensure that actions are taken internally to address any safety issues and hazards; and
 - (3) feed into the organisation's safety training, whilst maintaining appropriate confidentiality;
- (e) Feedback should be given to reportees both on an individual and more general basis to ensure their continued support of the occurrence reporting scheme.

AMC2 147.A.130(a)(3) Management system**ANNUAL REVIEW**

The Accountable manager should meet at least once per year with staff nominated in accordance with 147.A.105(b) and staff appointed in accordance with 147.A.105(c) to review the safety performance and the effectiveness of the management system.

GM1 147.A.130(a)(3) Management system**EMERGENCY RESPONSE PLAN**

- (a) An ERP typically defines the procedures, roles, responsibilities, and actions of key personnel and third parties that may be affected by an emergency, considering all activities of the organisation which may affect safety of flight, and all locations for such activities. (b) Maintenance events during practical training are normally covered under the

ERP of the organisation providing access to the aircraft. The organisation should be aware of the relevant ERP provisions and therefore should distribute the ERP procedures and communicate the content to all affected personnel and third parties if required. In an emergency, key personnel need to have easy access to the ERP at all times.

- (c) The ERP should be periodically tested for the adequacy of the plan and the results reviewed to improve its effectiveness.

AMC1 147.A.130(a)(4) Management system

TRAINING AND COMMUNICATION ON SAFETY

(a) Training

- (1) All personnel should receive safety training as appropriate for their safety responsibilities.
- (2) Adequate records of all safety training provided should be kept.

(b) Communication

- (1) The organisation should establish communication about safety matters that:
 - (i) ensures that all personnel are aware of the safety management activities as appropriate for their safety responsibilities;
 - (ii) conveys safety critical information, especially relating to assessed risks and analysed hazards;
 - (iii) explains why particular actions are taken; and
 - (iv) explains why safety procedures are introduced or changed.
- (2) Regular meetings with personnel where information, actions, and procedures are discussed, may be used to communicate safety matters.

GM1 147.A.130 (a)(5) Management system

ORGANISATION'S MANAGEMENT SYSTEM DOCUMENTATION

- (a) It is not required to duplicate information in several manuals. The information may be contained in the maintenance training organisation exposition .
- (b) The organisation may also choose to document some of the information required to be documented in separate documents (e.g. procedures). In this case, it should ensure that the maintenance training organisation exposition contains adequate references to any document kept separately. Any such documents are then to be considered an integral part of the organisation's management system documentation.

~~AMC 147.A.130(b) Training procedures and quality system~~

- ~~1. The independent audit procedure should ensure that all aspects of Part 147 compliance should be checked at least once in every 12 months and may be carried out as one complete single exercise or subdivided over a 12-month period in accordance with a scheduled plan.~~
- ~~2. In a small maintenance training organisation the independent audit function may be contracted to another maintenance training organisation approved under Part 147 or a competent person acceptable to the competent authority. Where the small training organisation chooses to contract the audit function it is conditional on the audit being~~

- carried out twice in every 12 month period with one such audit being unannounced.
3. Where the maintenance training organisation is also approved to another Part requiring a quality system, then such quality systems may be combined.
4. When training or examination is carried out under the sub contract control system:
- (i) a pre audit procedure should be established whereby the Part 147 approved maintenance training organisation' should audit a prospective sub contractor to determine whether the services of the sub contractor meet the intent of Part 147.
 - (ii) a renewal audit of the subcontractor should be performed at least once every 12 months to ensure continuous compliance with the Part 147 standard.
 - (iii) the sub contract control procedure should record audits of the sub contractor and to have a corrective action follow up plan.
5. The independence of the audit system should be established by always ensuring that audits are carried out by personnel not responsible for the function or procedure being checked.

GM to 147.A.130 (b) Training procedures and quality system

1. The primary objective of the quality system is to enable the training organisation to satisfy itself that it can deliver properly trained students and that the organisation remains in compliance with Part147.
2. The independent audit is a process of routine sample checks of all aspects of the training organisation's ability to carry out all training and examinations to the required standards. It represents an overview of the complete training system and does not replace the need for instructors to ensure that they carry out training to the required standard.
3. A report should be raised each time an audit is carried out describing what was checked and any resulting findings. The report should be sent to the affected department(s) for rectification action giving target rectification dates. Possible rectification dates may be discussed with the affected department(s) before the quality department confirms such dates on the report. The affected department(s) should rectify any findings and inform the quality department of such rectification.
4. A large training organisation (an organisation with the capacity to provide training for 50 students or more)]should have a dedicated quality audit group whose sole function is to conduct audits, raise finding reports and follow up to ensure that findings are being rectified. For the small training organisation (an organisation with the capacity to provide training for less than 50 students) it is acceptable to use competent personnel from one section/department not responsible for the function or procedure to check the section/department that is responsible subject to the overall planning and implementation being under the control of the quality manager.
5. The management control and follow up system should not be contracted to outside persons. The principal function is to ensure that all findings resulting from the independent audit are corrected in a timely manner and to enable the accountable manager to remain properly informed of the state of compliance. Apart from rectification of findings the accountable manager should hold routine meetings to check progress on rectification except that in the large training organisation 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.

AMC1 147.A.130 (a)(6) Management system

COMPLIANCE MONITORING FUNCTION

- (a) The implementation and use of a compliance monitoring function should enable the

organisation to monitor compliance with the relevant requirements of this Part and other applicable Parts.

- (1) The organisation should specify the basic structure of the compliance monitoring function applicable to the activities conducted.
 - (2) The compliance monitoring function should be structured according to the size of the organisation and the complexity of the activities to be monitored.
- (b) The organisation should monitor compliance with the procedures it has designed to ensure safe activities. In doing so, it should as a minimum, and where appropriate, monitor compliance with:
- (1) privileges of the organisation;
 - (2) maintenance training procedures;
 - (3) examination and assessment standards; and
 - (4) management system procedures and manuals.
- (c) The organisation should implement an audit planning cycle not exceeding 12 months, during which all management system key processes and maintenance training procedures should be completely audited against the applicable requirements. When determining the audit planning cycle, the organisation should consider the results of its safety risk assessment, and of past compliance monitoring in order to adapt the audit planning to the level of risk identified.
- (d) Notwithstanding point (c), the competent authority may agree to increase the audit planning cycle by up to 100 % provided that there are no safety critical findings, and subject to being satisfied that the organisation has a good record of rectifying findings in a timely manner.
- (e) Organisational set up
- (1) The compliance monitoring manager should be responsible for ensuring that the compliance monitoring programme is properly implemented, maintained, and continually reviewed and improved.
 - (2) The compliance monitoring manager should have access to all parts of the organisation, and as necessary, any contracted organisation.
 - (3) In the case the same person acts as compliance monitoring manager and as safety manager, the accountable manager, with regard to his/her direct accountability for safety, should ensure that sufficient resources are allocated to both functions, taking into account the size of the organisation and the nature and complexity of its activities.
 - (4) The independence of the compliance monitoring function should be established by ensuring that audits and inspections are carried out by personnel not responsible for the function, procedure, or products being audited.
- (f) Compliance monitoring documentation
- (1) Relevant documentation should include the relevant part(s) of the organisation's management system documentation.
 - (2) In addition, relevant documentation should also include the following:

- (i) terminology;
- (ii) specified activity standards;
- (iii) a description of the organisation;
- (iv) the allocation of duties and responsibilities;
- (v) procedures to ensure regulatory compliance; and
- (vi) the compliance monitoring programme, reflecting:
 - (A) the schedule of the monitoring programme;
 - (B) audit procedures;
 - (C) reporting procedures;
 - (D) follow-up and corrective action procedures; and
 - (E) the recording system;
- (vii) the training syllabus referred to in (g)(2); and
- (viii) document control.

(g) Training

- (1) Correct and thorough training is essential to optimise compliance in every organisation. In order to achieve significant outcomes of such training, the organisation should ensure that all personnel understand the objectives as laid down in the organisation's management system documentation.
- (2) Those responsible for managing the compliance monitoring function should receive training on this task. Such training should cover the requirements of compliance monitoring, manuals and procedures related to the task, audit techniques, reporting, and recording.
- (3) Time should be provided to train all personnel involved in compliance management and for briefing the remainder of the personnel.
- (4) The allocation of time and resources should be governed by the volume and complexity of the activities concerned.

AMC2 147.A.130(a)(6) Management system

CONCESSION CONTROL FOR DEVIATIONS FROM ORGANISATION'S PROCEDURES

- (a) In exceptional situations, it may temporarily be impossible for the organisation to comply with specific conditions stipulated in the procedures set forth in its management system documentation. For any deviation from those conditions a concession request should be submitted to the compliance monitoring manager. Such request should specify the reason for the request, and provide a justification, the condition/event concerned and its duration, as well as any compensatory measures that may be applied.
- (b) The compliance monitoring manager, in consultation with the safety manager or person having designated safety management responsibilities, should assess the deviation envisaged and compensatory measures proposed to ensure they do not affect compliance with the applicable Part-147 requirements. If required he/she should define additional compensatory measures to be applied.
- (c) The deviation and compensatory measures should only be implemented upon formal acceptance by the compliance monitoring manager.

- (d) It falls within the remit of the compliance monitoring function to ensure:
- (1) follow-up of all concessions granted until the organisation reverts back to the conditions stipulated in the procedures set forth in its management system documentation; and
 - (2) that records are kept of all concessions granted and compensatory measures implemented, in accordance with 147.A.132.

GM1 147.A.130 (a)(6) Management system**COMPLIANCE MONITORING — GENERAL**

- (a) The organisational set-up of the compliance monitoring function should reflect the size of the organisation and the nature and complexity of its activities. With the exception of audits of the compliance monitoring function itself the compliance monitoring manager may perform all audits and inspections - himself/herself or appoint one or more auditors by choosing personnel having the related competence as defined in AMC1 147.A.105(c), either from within or outside the organisation.
- (b) For a large training organisation (an organisation with the capacity to provide training for 50 students or more at the same time), it may be expected to have a dedicated group of internal auditors whose sole function is to conduct audits, raise finding reports, and follow up to ensure that findings are being rectified.
- (c) For a small training organisation (an organisation with the capacity to provide training for less than 50 students at the same time), it is acceptable to use competent personnel from one section/department not responsible for the function or procedure to monitor compliance in the section/department that is responsible subject to the overall planning and implementation being under the control of the compliance monitoring manager.
- (d) Regardless of the option chosen, it must be ensured that the independence of the audit function is not affected, in particular, in cases where those performing the audit or inspection are also responsible for other functions within the organisation.
- (e) In case external personnel are used to perform compliance audits or inspections:
- (1) any such audits or inspections are performed under the responsibility of the compliance monitoring manager; and
 - (2) the organisation remains responsible to ensure that the external personnel has relevant knowledge, background, and experience as appropriate to the activities being audited or inspected, including knowledge and experience in compliance monitoring.
- (f) The organisation retains the ultimate responsibility for the effectiveness of the compliance monitoring function, in particular, for the effective implementation and follow-up of all corrective actions.

147.A.131 Training, examination and assessment procedures

The organisation shall establish training, examination and assessment procedures acceptable to the competent authority to ensure proper training standards and compliance with all relevant requirements in this Part.

AMC1 147.A.131 Training, examination and assessment procedures**GENERAL**

- (a) Training, examination and assessment procedures should be held current such that they reflect best practice within the organisation. It is the responsibility of all personnel to report any differences via the organisation's internal safety reporting scheme.
- (b) All procedures, and changes to those procedures, should be verified and validated before use where practicable.

147.A.132 Management system record keeping

- (a) The organisation shall establish a system of record keeping that allows adequate storage and reliable traceability of all management system processes as defined in 147.A.130.
- (b) The format of the records shall be specified in the organisation's procedures.
- (c) Records shall be stored in a manner that ensures protection from damage, alteration, and theft.

AMC1 147.A.132 Management system record keeping**GENERAL**

- (a) The record keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a way that ensures traceability and retrievability throughout the required retention period.
- (b) Records should be kept in paper form or in electronic format or a combination of both. Records stored on microfilm or optical disc format are also acceptable. The records should remain legible throughout the required retention period. The retention period starts when the record has been created or last amended.
- (c) Paper systems should use robust material which can withstand normal handling and filing. Computer systems should have at least one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against the ability of unauthorised personnel to alter the data.
- (d) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data, and in an environment that ensures they remain in good condition. When hardware or software changes take place, special care should be taken that all necessary data continues to be accessible at least through the full period specified in the relevant requirement. In the absence of such indication, all records should be kept for a minimum period of 5 years.

GM1 147.A.132 Management system record keeping**RECORDS**

Microfilming or optical storage of records may be carried out at any time. The records should be as legible as the original record, and remain so for the required retention period.

147.A.133 Contracted activities

- (a) The organisation shall ensure that when contracting or purchasing any part of its activity, the contracted or purchased service or product conforms to the applicable requirements.

- (b) When the organisation subcontracts any part of its training activity, the contracted organisation shall work under the approval of the contracting organisation. The contracting organisation shall develop and maintain a subcontracting control procedure to ensure the subcontracted activities conform to the applicable requirements. The contracting organisation shall ensure that the competent authority is given access to the contracted organisation, to determine continued compliance with the applicable requirements.
- (c) The organisation shall only subcontract the following training, examination or assessment activities:
 - (1) basic theoretical training and examination for Part-66, Appendix I, Modules 1, 2, 3, 4, 5, 6, 8, 9, and 10.
 - (2) type training and examination for power plant and avionics systems.

AMC1 147.A.133(b) Contracted activities**SUBCONTRACTING CONTROL PROCEDURE**

When training or examination is carried out under the subcontracting control procedure:

- (a) A pre-contract procedure should be established whereby the organisation should audit a prospective subcontractor to determine whether the services of the subcontractor meet the intent of Part-147.

The pre-contract procedure should focus on establishing compliance with the training and examination standards set out in Part-147 and Part-66.
- (b) A contract should be established with the subcontractor upon successful completion of the pre-audit.
- (c) The contract between the organisation and the subcontractor should contain:
 - (1) a provision for the competent authority to have right of access to the contractor; and
 - (2) a provision for the subcontractor to inform the organisation of any change that may affect its Part-147 approval, before any such change takes place.
- (c) A renewal audit of the subcontractor should be performed at least once every 12 months to ensure continuous compliance with the Part-147 standard.
- (d) The contracting control procedure should provide for a corrective action follow-up plan.
- (e) The organisation should keep records of all audits, findings, and corrective actions in accordance with 147.A.132.

AMC2 147.A.133(b) Contracted activities**TRAINING STANDARD**

- (a) When training or examination is carried out under the subcontract control procedure, it means that for the duration of such training or examination, the Part-147 approval has been temporarily extended to include the non-certified subcontractor. It, therefore, follows that those parts of the subcontractor's facilities, personnel and procedures involved with the Part-147 organisation's students should meet requirements of Part-147 for the duration of that training or examination, and it remains the Part-147 organisation's responsibility to ensure such requirements are satisfied.

- (b) The Part-147 organisation is not required to have complete facilities and personnel for training that it needs to subcontract but it should have its own expertise to determine that the subcontractor meets the Part-147 requirements. Particular attention should be paid to ensuring that the training that is delivered also meets the requirements of Part-66 and the aircraft technologies are appropriate.

GM1 147.A.133(b) Contracted activities**MEANING OF CONTRACTING/SUBCONTRACTING**

- (a) 'Contracting' is intended to refer to the agreement between two or more parties for the provision of products or services, especially one that is written and enforceable by law.
- (b) 'Subcontracted activities/subcontracting' is intended to refer to all training, examination and assessment activities within the organisation's scope of approval that are performed by another organisation, where this latter organisation can be either certified or not certified in accordance with this Part to carry out such activity.

GM2 147.A.133(b) Contracted activities**LIMITATIONS**

- (a) The fundamental reason for allowing a Part-147 organisation to subcontract certain basic theoretical training courses is to permit the approval of maintenance training organisations which may not have the capacity to conduct training courses on all Part-66 modules.
- (b) The reason for allowing the subcontracting of training modules 1 to 6 and 8 to 10 only is that most of the related subjects can generally also be taught by training organisations not specialised in aircraft maintenance, and the practical training element as specified in 147.A.200 does not apply to them.
- (c) On the contrary, training modules 7 and 11 to 17 are specific to aircraft maintenance and include the practical training element as specified in 147.A.200. The intent of the 'limited subcontracting' option as specified in 147.A.145(d) is to grant Part-147 certificates only to those organisations having themselves at least the capacity to teach on aircraft maintenance specific matters.
- (d) In the case of type training and examination, the reason for allowing subcontracting only for power plant and avionics systems is that the related subjects can generally also be taught by certain organisations specialised in these domains such as the Design Approval Holder of the power plant or the Original Equipment Manufacturer (OEM) of these avionics systems. In such a case, the type training course should make clear how the interfaces with the airframe are addressed and by whom (the contracted organisation or the Part-147 organisation itself).

147.A.135 Examinations

- (a) ~~The examination staff shall ensure the security of all questions.~~
All staff involved in the preparation and conduct of examinations, as well as all staff having access to the examination database, shall ensure confidentiality of questions.
- (b) ~~Any student found during a knowledge examination to be cheating or in possession of material pertaining to the examination subject other than the examination papers and associated authorised documentation shall be disqualified from taking the examination and~~

~~may not take any examination for at least 12 months after the date of the incident. The competent authority shall be informed of any such incident together with the relevant details of any enquiry within one calendar month.~~

~~(c) Any examiner found during a knowledge examination to be providing question answers to any student being examined shall be disqualified from acting as an examiner and the examination declared void. The competent authority must be informed of any such occurrence within one calendar month.~~

(b) The organisation shall ban candidates who are proven to be cheating from taking any further Part-66 examination within 12 months of the date of the examination in which they were found cheating.

The organisation shall notify the competent authority of any such incident together with the details and description of such incident within one calendar month.

(c) The organisation shall ban from acting as an examiner any knowledge examiner found during a knowledge examination to be providing question answers to any student being examined. In such case, the organisation shall declare the examination void for the student(s) concerned.

The organisation shall notify the competent authority of any such incident within one month.

GM to 147.A.135 — Examinations

~~1. The competent authority will determine when or if the disqualified examiner may be reinstated.~~

147.A.140 Maintenance training organisation exposition

(a) ~~The organisation shall provide an exposition for use by the organisation describing the organisation and its procedures and containing the following information:~~

The organisation shall provide the competent authority with a maintenance training organisation exposition, and where applicable any referenced associated manuals containing the following information:

(1) a statement signed by the accountable manager confirming that the maintenance training organisation exposition and any associated manuals define the maintenance training organisation's compliance with this Regulation Part and shall be complied with at all times.

(2) the organisation's safety policy as defined in 147.A.130(a)(2).

~~(2)~~ (3) the title(s) and name(s) of the person(s) nominated in accordance with 147.A.105(b) and (c).

~~(3)~~ (4) the duties and responsibilities of the person(s) specified in subparagraph (3) 2, including matters on which they may deal directly with the competent authority on behalf of the maintenance training organisation.

~~(4)~~ (5) a maintenance training an organisation chart showing associated chains of accountability and responsibility of the person(s) specified in subparagraph (a)(2)(3) and related to 147.A.130(a)(1).

(6) the documentation of all required processes, in particular:

- (i) management system key processes as required by 147.A.130;
- (ii) maintenance training, examination and assessment procedures as required by 147.A.131;
- (iii) the maintenance training organisation's exposition amendment procedure; and
- (iv) the maintenance training organisation's control procedure, as required by 147.A.145(c), when authorised to conduct training, examination and assessments in locations different from those specified in 147.A.145(b).

(5) (7) a list of the training instructors, knowledge examiners and practical assessors.

(6) (8) a general description of the training and examination facilities and instructional equipment located at each address location specified in the maintenance training organisation's approval certificate, and if appropriate any other location, as required by 147.A.145(b).

(7) (9) a list of the maintenance training courses which form the extent of the approval.

8. the maintenance training organisation's exposition amendment procedure.

9. the maintenance training organisation's procedures, as required by 147.A.130(a).

10. the maintenance training organisation's control procedure, as required by 147.A.145(c), when authorised to conduct training, examination and assessments in locations different from those specified in 147.A.145(b).

(11) (10) a list of the locations pursuant to 147.A.145(b).

(12) (11) a list of subcontractors organisations, if appropriate, as specified in 147.A.145(d). a list of subcontracted organisations, where applicable, as specified in 147.A.145(d).

(b) The maintenance training organisation's exposition and any subsequent amendments shall be approved by the competent authority.

(c) Notwithstanding paragraph (b) minor amendments to the exposition may be approved through an exposition procedure (hereinafter called indirect approval).

(b) The exposition shall be amended as necessary to remain an up-to-date description of the organisation. The exposition and any subsequent amendments shall be approved by the competent authority.

(c) Notwithstanding paragraph (b), minor amendments to the exposition may not require prior approval and may be managed in accordance with the procedure referred to in 147.A.150(c) approved in accordance with 147.B.310(h).

AMC1 147.A.140 Maintenance training organisation exposition

FORMAT

(a)1. A recommended format of the exposition is included in Appendix 1.

(b)2. When the maintenance training organisation is approved in accordance with any other Part which also requires an exposition, the exposition required by the other Part may form the basis of the maintenance training organisation exposition in a combined document, as long as the other exposition contains the information required by 147.A.140 and a cross

~~reference index is included based upon Appendix I.~~

When the organisation holds one or more additional organisation certificates within the scope of Regulation (EC) No 216/2008 containing a requirement for an exposition or manual, it may choose to combine the maintenance training organisation exposition with such exposition or manual in order to avoid duplication. An index showing where each requirement is addressed should be kept up to date and made available to the competent authority upon request.

- (c) ~~3.~~ When training or examination is carried out under the subcontract control ~~procedure system~~ the maintenance training organisation exposition should contain a specific procedure on the control of subcontractors as per Appendix 1 item 2.18 plus a list of subcontractors as required by 147.A.140 (a) ~~12~~ **11** and detailed in Appendix I item 1.7.
- ~~4. The competent authority may approve a delegated exposition approval system for all changes other than those affecting the approval.~~

147.A.145 Privileges of the maintenance training organisation

- (a) ~~The maintenance training organisation may carry out the following as permitted by and in accordance with the maintenance training organisation exposition:~~

In accordance with the maintenance training organisation exposition, the organisation shall be entitled to carry out the following tasks:

- (1) basic training courses to the Part-66 syllabus, or part thereof.
 - (2) aircraft type/task training courses in accordance with Part-66.
 - (3) ~~the examinations on behalf of the competent authority~~, including the examination of students who did not attend the basic or aircraft type training course at the maintenance training organisation.
 - (4) the issue of certificates in accordance with Appendix III following successful completion of the approved basic or aircraft type training courses and examinations specified in subparagraphs (a)(1), (a)(2) and (a)(3), as applicable.
- (b) Training, knowledge examinations and practical assessments may only be carried out at the locations identified in the ~~approval~~ certificate and/or at any location specified in the maintenance training organisation exposition.
- (c) ~~By derogation to~~ **Notwithstanding** paragraph (b), the maintenance training organisation may ~~only~~ conduct training, knowledge examinations and practical assessments in locations different from the paragraph (b) locations in accordance with a control procedure specified in the maintenance training organisation exposition. Such locations need not be listed in the maintenance training organisation exposition.
- (d) ~~1. The maintenance training organisation may subcontract the conduct of basic theoretical training, type training and related examinations to a non-maintenance training organisation another organisation only when under the control of the maintenance training organisation's management quality system and in accordance with 147.A.133.~~
- ~~2. The subcontracting of basic theoretical training and examination is limited to Part 66, Appendix I, Modules 1, 2, 3, 4, 5, 6, 8, 9 and 10.~~
- ~~3. The subcontracting of type training and examination is limited to powerplant and avionics systems.~~
- (e) An organisation may **only** ~~not be approved to~~ conduct examinations ~~unless~~ **for which it is** approved to conduct the corresponding training.

- (f) ~~By derogation to Notwithstanding from point paragraph (e), an organisation approved to provide basic knowledge training or type training may also be approved to provide type examination without being approved to conduct the corresponding training in the cases where type training is not required.~~

~~AMC 147.A.145(d) – Privileges of the maintenance training organisation~~

- ~~1. When training or examination is carried out under the sub-contract control system it means that for the duration of such training or examination, the Part 147 approval has been temporarily extended to include the sub-contractor. It therefore follows that those parts of the sub-contractor's facilities, personnel and procedures involved with the Part 147 approved maintenance training organisation's students should meet requirements of Part 147 for the duration of that training or examination and it remains the Part 147 organisation's responsibility to ensure such requirements are satisfied.~~
- ~~2. The maintenance training organisation approved under Part 147 is not required to have complete facilities and personnel for training that it needs to sub-contract but it should have its own expertise to determine that the sub-contractor meets the Part 147 standards. Particular attention should be given to ensuring that the training that is delivered also meets the requirements of Part 66 and the aircraft technologies are appropriate.~~
- ~~3. The contract between the maintenance training organisation approved under Part 147 and the sub-contractor should contain:~~
 - ~~— a provision for the Agency and the competent authority to have right of access to the sub-contractor;~~
 - ~~— a provision for the sub-contractor to inform the Part 147 approved maintenance training organisation of any change that may affect its Part 147 approval, before any such change takes place.~~

~~GM 147.A.145 – (d) Privileges of the maintenance training organisation~~

- ~~1. The pre audit procedure should focus on establishing compliance with the training and examination standards set out in Part 147 and Part 66.~~
- ~~2. The fundamental reason for allowing a maintenance training organisation approved under Part 147 to sub-contract certain basic theoretical training courses is to permit the approval of maintenance training organisations which may not have the capacity to conduct training courses on all Part 66 modules.~~
- ~~3. The reason for allowing the subcontracting of training modules 1 to 6 and 8 to 10 only is, most of the related subjects can generally also be taught by training organisations not specialised in aircraft maintenance and the practical training element as specified in 147.A.200 does not apply to them. On the contrary training modules 7 and 11 to 17 are specific to aircraft maintenance and include the practical training element as specified in 147.A.200. The intent of the "limited subcontracting" option as specified in 147.A.145 is to grant Part 147 approvals only to those organisations having themselves at least the capacity to teach on aircraft maintenance specific matters.~~

~~GM 147.A.145(d)3 – Privileges of the maintenance training organisation~~

~~In the case of type training and examination, the reason for allowing only subcontracting to powerplant and avionic systems is that the related subjects can generally also be imparted by certain organisations specialised in these domains such as the Type Certificate Holder of the powerplant or the OEMs of these avionics systems. In such a case, the type training course should make clear how the interfaces with the airframe are addressed and by whom (the subcontracted organisation or the Part 147 organisation itself).~~

AMC1 147.A.145(f) Privileges of the maintenance training organisation**APPROVAL FOR TYPE EXAMINATION**

When an organisation approved to provide basic knowledge training or type training is also approved to provide type examination in the cases where type training is not required, appropriate procedures in the MTOE maintenance training organisation exposition should be developed and approved, including:

- (a) the development and the conduct of the type examination; and
- (b) the qualifications of the examiners and their currency.

In particular, emphasis should be put when such an examination is not regularly conducted or when the examiners are not normally involved in aircraft or activities with technology corresponding to the aircraft type subject to examination. ~~An example would be the case of an organisation providing basic knowledge training only for the B1.1 license. This organisation should justify how they run type examinations for single piston engine helicopters in the case of a B1.4 licence.~~

GM1 147.A.145(f) Privileges of the maintenance training organisation**EXAMINATIONS NOT REGULARLY CONDUCTED**

An example would be the case of an organisation providing basic knowledge training only for the B1.1 licence. This organisation should justify how they perform type examinations for single piston-engine helicopters in the case of a B1.4 licence.

147.A.148 Means of compliance

- (a) Alternative means of compliance to the AMC adopted by the Agency may be used by an organisation to establish compliance with this Regulation .
- (b) When an organisation wishes to use an alternative means of compliance, it shall, prior to implementing it, provide the competent authority with a full description of the alternative means of compliance. The description shall include any revisions to manuals or procedures that may be relevant, as well as an assessment demonstrating compliance with this Regulation.

The organisation may implement these alternative means of compliance subject to prior approval by the competent authority and upon receipt of the notification as prescribed in 147.B.120(d).

AMC1 147.A.148 Means of compliance**DEMONSTRATION OF COMPLIANCE**

In order to demonstrate that the Implementing Rules are met, a risk assessment should be completed and documented. The result of this risk assessment should demonstrate that an equivalent level of safety to that established by the AMC adopted by the Agency is reached.

147.A.150 Changes to the maintenance training organisation

- ~~(a) The maintenance training organisation shall notify the competent authority of any proposed changes to the organisation that affect the approval before any such change takes place, in order to enable the competent authority to determine continued compliance with this Part and to amend if necessary the maintenance training organisation approval certificate.~~
- ~~(b) The competent authority may prescribe the conditions under which the maintenance~~

~~training organisation may operate during such changes unless the competent authority determines that the maintenance training organisation approval must be suspended.~~

~~(c) Failure to inform the competent authority of such changes may result in suspension or revocation of the maintenance training organisation approval certificate backdated to the actual date of the changes.~~

(a) Any change affecting:

(1) the scope of the certificate or the terms of approval of the organisation; or

(2) any of the elements of the organisation's management system as required in 147.A.130(a)(1) and (a)(2),

shall require prior approval by the competent authority.

(b) For any changes requiring prior approval in accordance with (a), the organisation shall apply for, and obtain an approval issued by the competent authority. The application shall be submitted before any such change takes place, in order to enable the competent authority to determine continued compliance with this Regulation and to amend, if necessary, the organisation certificate and related terms of approval attached to it.

The organisation shall provide the competent authority with any relevant documentation.

The change shall only be implemented upon receipt of formal approval by the competent authority in accordance with 147.B.330.

The organisation shall operate under the conditions prescribed by the competent authority during such changes, as applicable.

(c) All changes not requiring prior approval shall be managed and notified to the competent authority as defined in the procedure referred to in 147.A.15 and approved by the competent authority in accordance with 147.B.310(h).

AMC1 147.A.150 Changes to the organisations

APPLICATION TIME FRAMES

(a) The application for the amendment of an organisation certificate should be submitted at least 30 days before the date of the intended changes.

(b) In the case of a planned change of a nominated person, the organisation should inform the competent authority at least 10 days before the date of the proposed change.

(c) Unforeseen changes should be notified at the earliest opportunity, in order to enable the competent authority to determine continued compliance with the applicable requirements, and to amend, if necessary, the organisation certificate and related terms of approval.

AMC2 147.A.150 Changes to the organisations

MANAGEMENT OF CHANGES

The organisation should manage safety risks related to any changes to the organisation. For changes requiring prior approval, it should provide the safety risk assessment to the competent authority upon request.

AMC3 147.A.150 Changes to the organisations

ADDITIONAL BASIC OR AIRCRAFT TYPE TRAINING COURSES

- (e) For any additional basic or aircraft type training courses, the organisation should make a new application to the competent authority and submit an amended maintenance training organisation exposition.
- (f) For basic training extensions, the organisation should submit the new course material and an additional sample of new examination questions relevant to the modules associated with the extension being sought.

AMC4 147.A.150 Changes to the organisations**CHANGE OF ACCOUNTABLE MANAGER OR SENIOR PERSONNEL**

- (a) In case of change of accountable manager, the organisation should notify the competent authority of the fact as a matter of urgency together with the amendment to the accountable manager exposition statement.
- (b) In case of change of any of the senior personnel specified in 147.A.105(b), the organisation should submit an EASA Form 4 in respect of the particular person.

AMC5 147.A.150 Changes to the organisations**CHANGE OF LOCATION**

For any change of location, the organisation should make a new application to the competent authority and submit an amended maintenance training organisation exposition.

GM1 147.A.150(a) Changes to the organisation**GENERAL**

- (a) Typical examples of changes that may affect the certificate, or the terms of approval are listed below:
 - (1) the name of the organisation;
 - (2) a change of legal entity;
 - (3) the organisation's principal place of business;
 - (4) the organisation's scope of approval;
 - (5) a change of location of the organisation;
 - (6) additional locations of the organisation;
 - (7) the accountable manager;
 - (8) any of the persons referred to in 147.A.105(b) or 147.A.105(h);
 - (9) the organisation's documentation as required by this Regulation, safety policy and procedures; and
 - (10) the facilities, training equipment and training material.
- (b) Prior approval by the competent authority is required for any changes to the organisation's procedure describing how changes not requiring prior approval will be managed and notified to the competent authority.
- (c) Changes requiring prior approval may only be implemented upon receipt of formal approval by the competent authority.

GM2 147.A.150(a) Changes to the organisation**CHANGE OF NAME OF THE ORGANISATION**

- (a) A change of name requires the organisation to submit a new application as a matter of urgency.
- (b) Where this is the only change to report, the new application can be accompanied by a copy of the documentation previously submitted to the competent authority under the previous name, as a means of demonstrating how the organisation complies with the applicable requirements.

147.A.155 Continued validity

- (a) ~~An approval shall be issued for an unlimited duration. It~~ The organisation's certificate shall remain valid subject to:
 - (1) the organisation remaining in compliance with this Regulation ~~this Part~~, taking into account ~~in accordance with~~ the provisions related to the handling of findings as specified under 147.B.130 350; and
 - (2) the competent authority being granted access to the organisation as defined in 147.A.157 to determine continued compliance with this Regulation ~~Part~~; and
 - (3) the certificate not being ~~revoked or surrendered~~ surrendered or ~~revoked~~.
- (b) Upon ~~revocation or surrender~~ ~~surrender or revocation~~, the certificate approval shall be returned to the competent authority without delay.

147.A.157 Access

For the purpose of determining compliance with the relevant requirements of this Regulation, the organisation shall grant access at any time to any facility, document, records, data, procedures, or any other material relevant to its activity subject to certification, whether it is contracted or not, to any person authorised by one of the following authorities:

- (a) the competent authority responsible for the certificate; and/or
- (b) the authority acting under the provisions of 147.B.300(d).

147.A.160 Findings

- ~~(a) A level 1 finding is one or more of the following:~~
 - ~~1. any significant non-compliance with the examination process which would invalidate the examination(s);~~
 - ~~2. failure to give the competent authority access to the organisation's facilities during normal operating hours after two written requests;~~
 - ~~3. the lack of an accountable manager;~~
 - ~~4. a significant non-compliance with the training process.~~
- ~~(b) A level 2 finding is any non-compliance with the training process other than level 1 findings.~~
- ~~(c) After receipt of notification of findings according to 147.B.130, the holder of the maintenance training organisation approval shall define a corrective action plan and demonstrate corrective action to the satisfaction of the competent authority within a period agreed with this authority.~~

After receipt of notification of findings according to 145.B.350, the organisation shall:

- (a) identify the root cause of the non-compliance;
- (b) define a corrective action plan; and
- (c) demonstrate corrective action implementation to the satisfaction of the competent authority within a period agreed with that authority as defined in 147.B.350(d).

AMC1 147.A.160 Findings

GENERAL

The corrective action plan defined by the organisation should address the effects of the non-compliance, as well as its root cause(s) and contributing factors.

GM1 147.A.160 Findings

GENERAL

- (a) 'Preventive action' is the action to eliminate the cause of a potential non-compliance, or other undesirable potential situation.
- (b) 'Corrective action' is the action to eliminate or mitigate the root cause(s), and prevent recurrence of an existing detected non-compliance, or other undesirable condition or situation. Proper determination of the root cause(s) is crucial for defining effective corrective actions to prevent reoccurrence.
- (c) 'Correction' is the action to eliminate a detected non-compliance.

GM2 147.A.160 Findings

ROOT CAUSE ANALYSIS

- (a) It is important that the analysis does not primarily focus on establishing who or what caused the non-compliance but why it was caused. Establishing the root cause or causes of a non-compliance often requires an overarching view of the events and circumstances that lead to it, to identify all possible systemic and contributing factors (regulatory, human factors, organisational, managerial, cultural, technical, etc.) in addition to the direct factors. A narrow focus on single events or failures, or the use of a simple, linear model, such as fault tree, to identify the chain of events that lead to the non-compliance may not properly reflect the complexity of the issue, and, therefore, bears the risk that important factors required to be addressed in order to prevent reoccurrence will be ignored.
- (b) Such inappropriate or partial root cause analysis often leads to defining 'quick fixes' addressing the symptoms of the non-conformity only. A peer review of the results of the root cause analysis may increase its reliability and objectivity.
- (c) A system description of the organisation considering organisational structures, processes and their interfaces, procedures, staff, equipment, facilities, and the environment in which the organisation operates will support both effective root cause (reactive) and hazard (proactive) analysis.

147.A.170 Immediate reaction to a safety problem

The organisation shall implement any safety measures mandated by the competent authority in accordance with 147.B.135(d).

Section B

Procedures for Competent Authorities

SUBPART A – GENERAL

147.B.105 Scope

This section establishes the administrative requirements to be followed by the competent authorities in charge of the application and the enforcement of Section A of this Part.

This section establishes the administrative procedures which the competent authority shall follow when exercising its tasks and responsibilities regarding issue, change, suspension, limitation or revocation of Part-147 maintenance training organisation certificates.

~~147.B.10 Competent Authority~~

~~(a) General~~

The Member State shall designate a competent authority with allocated responsibilities for the issuance, continuation, change, suspension or revocation of Part 147 certificates. This competent authority shall establish documented procedures and an organisational structure.

~~(b) Resources~~

The competent authority shall be appropriately staffed to carry out the requirements of this Part.

~~(c) Procedures~~

The competent authority shall establish procedures detailing how compliance with this Part is accomplished. The procedures shall be reviewed and amended to ensure continued compliance.

~~(d) Qualification and training~~

All staff involved in approvals related to this Annex must:

- ~~1. Be appropriately qualified and have all necessary knowledge, experience and training to perform their allocated tasks.~~
- ~~2. Have received training and continuation training on Annex III (Part 66) and Annex IV (Part 147) where relevant, including its intended meaning and standard.~~

AMC 147.B.10 (a) Competent authority

- ~~1. In deciding upon the required organisational structure, the competent authority should review the number of certificates to be issued, the number and size of potential Part 147 approved maintenance training organisations within that Member State, as well as the level of civil aviation activity, number and complexity of aircraft and the size of the Member State's aviation industry.~~
- ~~2. The competent authority should retain effective control of important surveillance functions and not delegate them in such a way that Part 147 organisations, in effect, regulate themselves in airworthiness matters.~~
- ~~3. The set-up of the organisational structure should ensure that the various tasks and obligations of the competent authority are not relying on individuals. That means that a continuing and undisturbed fulfilment of these tasks and obligations of the competent authority should also be guaranteed in case of illness, accident or leave of individual employees.~~

AMC 147.B.10 (b) — Competent authority

1. — competent authority surveyors should have:
 - 1.1 — practical experience and expertise in the application of aviation safety standards and safe operating practices;
 - 1.2 — comprehensive knowledge of:
 - a. — relevant parts of implementing rules, certification specifications and guidance material;
 - b. — the competent authority's procedures;
 - c. — the rights and obligations of a surveyor;
 - d. — quality systems;
 - e. — continuing airworthiness management.
 - 1.3 — training on auditing techniques.
 - 1.4 — five years relevant work experience to be allowed to work as a surveyor independently. This may include experience gained during training to obtain the 1.5 qualification.
 - 1.5 — a relevant engineering degree or an aircraft maintenance or training qualification with additional education. 'relevant engineering degree' means an engineering degree from aeronautical, mechanical, electrical, electronic, avionic or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components.
 - 1.6 — knowledge of a relevant sample of aircraft types
 - 1.7 — knowledge of maintenance training standards.
2. — In addition to technical competency, surveyors should have a high degree of integrity, be impartial in carrying out their tasks, be tactful, and have a good understanding of human nature.
3. — A programme for continuation training should be developed that ensures that the surveyors remain competent to perform their allocated tasks.

AMC 147.B.10 (c) — Competent authority

The documented procedures should contain the following information:

- (a) — The Member State's designation of the competent authority(ies).
- (b) — The title(s) and name(s) of the manager(s) of the competent authority and their duties and responsibilities.
- (c) — Organisation chart(s) showing associated chains of responsibility of the senior persons.
- (d) — A procedure defining the qualifications for staff together with a list of staff authorised to sign certificates.
- (e) — A general description of the facilities.
- (f) — Procedures specifying how the competent authority(ies) ensure(s) compliance with Part 147.

147.B.115 Oversight documentation

The competent authority shall provide all legislative acts, standards, rules, technical publications, and related documents to relevant personnel in order to allow them to perform their tasks and to discharge their responsibilities.

147.B.120 Means of compliance

- (a) The Agency shall develop Acceptable Means of Compliance (AMC) that may be used to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules. When the AMC are complied with, the related requirements of the Implementing Rules are met.
- (b) Alternative means of compliance may be used to establish compliance with the Implementing Rules.
- (c) The competent authority shall establish a system to consistently evaluate that all alternative means of compliance used by itself or by organisations and persons under its oversight allow the establishment of compliance with Regulation (EC) No 216/2008 and its Implementing Rules.
- (d) The competent authority shall evaluate all alternative means of compliance proposed by an organisation in accordance with 147.A.148 by analysing the documentation provided and, if considered necessary, conducting an inspection of the organisation.

When the competent authority finds that the alternative means of compliance are in accordance with the Implementing Rules, it shall without undue delay:

- (1) notify the applicant that the alternative means of compliance may be implemented and, if applicable, amend the approval or certificate of the applicant accordingly; and
 - (2) notify the Agency of their content, including copies of all relevant documentation.
 - (3) inform other Member States about alternative means of compliance that were accepted.
- (e) When the competent authority itself uses alternative means of compliance to achieve compliance with Regulation (EC) No 216/2008 and its Implementing Rules it shall:
 - (1) make them available to all organisations and persons under its oversight; and
 - (2) without undue delay notify the Agency.

The competent authority shall provide the Agency with a full description of the alternative means of compliance, including any revisions to procedures that may be relevant, as well as a assessment demonstrating that the Implementing Rules are met.

AMC1 147.B.120(d)(3) Means of compliance**INFORMATION TO OTHER MEMBER STATES**

The information to be provided to other Member States following approval of an alternative means of compliance should contain a reference to the Acceptable Means of Compliance (AMC) to which such means of compliance provides an alternative, as well as a reference to the corresponding Implementing Rule, indicating, as applicable, the subparagraph(s) covered by the alternative means of compliance.

GM1 147.B.120 Means of compliance**GENERAL**

Alternative means of compliance used by a competent authority, or by a person or organisations under its oversight may be used by other competent authorities, persons, or organisations only if processed again in accordance with 147.B.120(d) or (e).

147.B.125 Information to the Agency

The competent authority shall without undue delay notify the Agency in case of any significant problems with the implementation of Regulation (EC) No 216/2008 and its Implementing Rules.

147.B.135 Immediate reaction to a safety problem

- (a) Without prejudice to Directive 2003/42/EC of the European Parliament and of the Council the competent authority shall implement a system to appropriately collect, analyse, and disseminate safety information.
- (b) The Agency shall implement a system to appropriately analyse any relevant safety information received, and without undue delay provide to Member States and the Commission any information, including recommendations or corrective actions to be taken, necessary for them to react in a timely manner to a safety problem involving products, parts, appliances, persons, or organisations subject to Regulation (EC) No 216/2008 and its Implementing Rules.
- (c) Upon receiving the information referred to in (a) and (b), the competent authority shall take adequate measures to address the safety problem.
- (d) Measures taken under (c) shall immediately be notified to all persons or organisations which need to comply with them under Regulation (EC) No 216/2008 and its Implementing Rules. The competent authority shall also notify those measures to the Agency and, when combined action is required, the other Member States concerned.

~~147.B.20 Record-keeping~~

- ~~(a) The competent authority shall establish a system of record-keeping that allows adequate traceability of the process to issue, renew, continue, vary, suspend or revoke each approval.~~
- ~~(b) The records for the oversight of maintenance training organisations shall include as a minimum:~~
 - ~~1. the application for an organisation approval.~~
 - ~~2. the organisation approval certificate including any changes.~~
 - ~~3. a copy of the audit program listing the dates when audits are due and when audits were carried out.~~
 - ~~4. continued oversight records including all audit records.~~
 - ~~5. copies of all relevant correspondence.~~
 - ~~6. details of any exemption and enforcement actions.~~
 - ~~7. any report from other competent authorities relating to the oversight of the organisation.~~
 - ~~8. organisation exposition and amendments.~~
- ~~(c) The minimum retention period for the paragraph (b) records shall be four years.~~

~~AMC 147.B.20 Record-keeping~~

- ~~1. The record-keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organized in a consistent way through out the competent authority (chronological, alphabetical order, etc.).~~

- ~~2. All records containing sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure confidentiality of this kind of data.~~
- ~~3. All computer hardware used to ensure data backup should be stored in a different location from that containing the working data in an environment that ensures they remain in good condition. When hardware or software changes take place special care should be taken that all necessary data continues to be accessible at least through the full period specified in 147.B.20.~~

~~147.B.25 Exemptions~~

- ~~(a) The competent authority may exempt a State education department school from:~~
 - ~~1. being an organisation as specified in 147.A.10.~~
 - ~~2. having an accountable manager, subject to the limitation that the department appoint a senior person to manage the training organisation and such person has a budget sufficient to operate the organisation to the standard of Part 147.~~
 - ~~3. having recourse to the independent audit part of a quality system subject to the department operating an independent schools inspectorate to audit the maintenance training organisation at the frequency required by this Part.~~
- ~~(b) All exemptions granted in accordance with Article 10(3) of the basic Regulation shall be recorded and retained by the competent authority.~~

SUBPART B – MANAGEMENT SYSTEM**147.B.200 Management system**

- (a) The competent authority shall establish and maintain a management system, including as a minimum:
- (1) documented policies and procedures to describe its organisation, means and methods to achieve compliance with Regulation (EC) No 216/2008 and its Implementing Rules. The procedures shall be kept up to date, and serve as the basic working documents within that competent authority for all related tasks;
 - (2) a sufficient number of personnel to perform its tasks and discharge its responsibilities. A system shall be in place to plan the availability of personnel, in order to ensure the proper completion of all tasks;
 - (3) personnel qualified to perform their allocated tasks and have the necessary knowledge, experience, initial and recurrent training to ensure continuing competence;
 - (4) adequate facilities and office accommodation to perform the allocated tasks;
 - (5) a function to monitor compliance of the management system with the relevant requirements and adequacy of the procedures including the establishment of an internal audit process and a safety risk management process. Compliance monitoring shall include a feedback system of audit findings to the senior management of the competent authority to ensure implementation of corrective actions as necessary; and
 - (6) a person or group of persons, ultimately responsible to the senior management of the competent authority for the compliance monitoring function.
- (b) The competent authority shall, for each field of activity, including management system, appoint one or more persons with the overall responsibility for the management of the relevant task(s).
- (c) The competent authority shall establish procedures for participation in a mutual exchange of all necessary information and assistance with other competent authorities concerned, including all findings raised and follow-up actions taken as a result of oversight of persons and organisations exercising activities in the territory of a Member State, but certified by the competent authority of another Member State or the Agency.
- (d) A copy of the procedures related to the management system and their amendments shall be made available to the Agency for the purpose of standardisation.

AMC1 147.B.200 Management system**GENERAL**

- (a) All of the following should be considered when deciding upon the required organisational structure:
- (1) the number of certificates, attestations, authorisations and approvals to be issued;
 - (2) the number of certified persons and organisations exercising an activity within that Member State, including persons or organisations certified by other competent authorities;

- (3) the possible use of qualified entities and of resources of other competent authorities to fulfil the continuing oversight obligations;
 - (4) the level of civil aviation activity in terms of:
 - (i) number and complexity of aircraft;
 - (ii) size and complexity of the Member State's aviation industry;
 - (5) the potential growth of activities in the field of civil aviation.
- (b) The set-up of the organisational structure should ensure that the various tasks and obligations of the competent authority do not solely rely on individuals. A continuous and undisturbed fulfilment of these tasks and obligations of the competent authority should also be guaranteed in case of illness, accident or leave of individual employees.

GM1 147.B.200 Management system**GENERAL**

- (a) The competent authority designated by each Member State should be organised in such a way that:
- (1) there is specific and effective management authority in the conduct of all relevant activities;
 - (2) the functions and processes described in the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, and AMCs, Certification Specifications (CSs), and Guidance Material (GM) may be properly implemented;
 - (3) the competent authority's organisation and operating procedures for the implementation of the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules are properly documented and applied;
 - (4) all competent authority personnel involved in the related activities are provided with training where necessary;
 - (5) specific and effective provision is made for the communication and interface as necessary with the Agency and the competent authorities of other Member States; and
 - (6) all functions related to implementing the applicable requirements are adequately described.
- (b) A general policy in respect of activities related to the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules should be developed, promoted, and implemented by the manager at the highest appropriate level; for example, the manager at the top of the functional area of the competent authority that is responsible for such activities.
- (c) Appropriate steps should be taken to ensure that the policy is known and understood by all personnel involved, and all necessary steps should be taken to implement and maintain the policy.
- (d) The general policy, whilst also satisfying additional national regulatory responsibilities, should in particular take into account:
- (1) the provisions of Regulation (EC) No 216/2008;
 - (2) the provisions of the applicable Implementing Rules and their AMCs, CSs, and GM;

- (3) the needs of industry; and
- (4) the needs of the Agency and of the competent authority.
- (e) The policy should define specific objectives for key elements of the organisation and processes for implementing related activities, including the corresponding control procedures and the measurement of the achieved standard.

AMC1 147.B.200(a)(1) Management system**DOCUMENTED POLICIES AND PROCEDURES**

- (a) The various elements of the organisation involved with the activities related to Regulation (EC) No 216/2008 and its Implementing Rules should be documented in order to establish a reference source for the establishment and maintenance of this organisation.
- (b) The documented procedures should be established in a way that facilitates their use. They should be clearly identified, kept up to date, and made readily available to all personnel involved in the related activities.
- (c) The documented procedures should cover, as a minimum, all of the following aspects:
 - (1) policy and objectives;
 - (2) organisational structure;
 - (3) responsibilities and associated authority;
 - (4) procedures and processes;
 - (5) internal and external interfaces;
 - (6) internal control procedures;
 - (7) training of personnel;
 - (8) cross references to associated documents; and
 - (9) assistance from other competent authorities or the Agency (where required).
- (d) It is likely that the information is held in more than one document or series of documents, and suitable cross-referencing should be provided. For example, organisational structure and job descriptions are not usually in the same documentation as the detailed working procedures. In such cases, it is recommended that the documented procedures include an index of cross references to all such other related information, and the related documentation should be readily available when required.

GM1 147.B.200(a)(2) Management system**SUFFICIENT PERSONNEL**

- (a) This GM on the determination of the required personnel is limited to the performance of certification and oversight tasks, excluding personnel required to perform tasks subject to any national regulatory requirements.
- (b) The elements to be considered when determining required personnel and planning their availability may be divided into quantitative and qualitative elements:
 - (1) Quantitative elements:
 - (i) the estimated number of initial certificates to be issued;
 - (ii) the number of organisations certified by the competent authority; and

- (iii) the number of facilities within the territory of the Member States of organisations established in another Member State.
- (2) Qualitative elements:
 - (i) the size, nature, and complexity of activities of certified organisations, taking into account:
 - (A) privileges of the organisation;
 - (B) type of approval, scope of approval;
 - (C) possible certification to industry standards;
 - (D) number of personnel; and
 - (E) organisational structure, existence of subsidiaries;
 - (ii) the safety priorities identified;
 - (iii) the results of past oversight activities, including audits, inspections and reviews, in terms of risks and regulatory compliance, taking into account:
 - (A) number and level of findings;
 - (B) timeframe for implementation of corrective actions; and
 - (C) maturity of management systems implemented by organisations, and their ability to effectively manage safety risks; and
 - (iv) the size and complexity of the Member State's aviation industry, and the potential growth of activities in the field of civil aviation which may be an indication of the number of new applications, and changes to existing certificates to be expected.
- (c) Based on existing data from previous oversight planning cycles, and taking into account the situation within the Member State's aviation industry, the competent authority may estimate:
 - (1) the standard working time required for processing applications for new certificates;
 - (2) the number of new certificates to be issued for each planning period; and
 - (3) the number of changes to existing certificates to be processed for each planning period.
- (d) In line with the competent authority's oversight policy, the following planning data should be determined:
 - (1) standard number of audits to be performed per oversight planning cycle;
 - (2) standard duration of each audit;
 - (3) standard working time for audit preparation, on-site audit, reporting, and follow-up, per inspector;
 - (4) standard number of unannounced inspections to be performed;
 - (5) standard duration of inspections, including preparation, reporting, and follow-up, per inspector; and
 - (6) minimum number and required qualification of inspectors for each audit/inspection.
- (e) Standard working time could be expressed either in working hours per inspector, or in working days per inspector. All planning calculations should, then, be based on the same unit (hours or working days).

- (f) It is recommended to use a spreadsheet application to process data defined under (c) and (d), to assist in determining the total number of working hours/days per oversight planning cycle required for certification, oversight, and enforcement activities. This application could also serve as a basis for implementing a system for planning the availability of personnel.
- (g) The number of working hours/days per planning period for each qualified inspector that may be allocated for certification, oversight and enforcement activities should be determined, taking into account:
 - (1) purely administrative tasks not directly related to certification and oversight;
 - (2) training;
 - (3) participation in other projects;
 - (4) planned absence; and
 - (5) the need to include a reserve for unplanned tasks or unforeseeable events.
- (h) The determination of working time available for certification, oversight and enforcement activities should also consider:
 - (1) the possible use of qualified entities;
 - (2) possible cooperation with other competent authorities for approvals involving more than one Member State; and
 - (3) oversight activities under a bilateral aviation safety agreement.
- (i) Based on the elements listed above, the competent authority should be able to:
 - (1) monitor dates when audits and inspections are due, and when they have been carried out;
 - (2) implement a system to plan the availability of personnel; and
 - (3) identify possible gaps between the number and qualification of personnel and the required volume of certification and oversight.

Care should be taken to keep planning data up to date in line with changes in the underlying planning assumptions, with particular focus on risk-based oversight principles.

AMC1 147.B.200(a)(3) Management system

QUALIFICATION AND TRAINING — GENERAL

- (a) The competent authority should ensure appropriate and adequate training of its personnel to meet the standard that is considered necessary to perform the work. To ensure personnel remain qualified, arrangements should be made for initial and recurrent training as required.
- (b) The basic capability of the competent authority's personnel is a matter of recruitment, and normal management functions in selection of personnel for particular duties. Moreover, the competent authority should provide training in the basic skills as required for those duties. However, to avoid differences in understanding and interpretation, all personnel should be provided with further training specifically related to Regulation (EC) No 216/2008, its Implementing Rules and related AMCs, CSs, and GM, as well as related to the assessment of alternative means of compliance.
- (c) The competent authority may provide training through its own training organisation with qualified trainers, or through another qualified training source.

- (d) When training is not provided through an internal training organisation, adequately experienced and qualified persons may act as trainers, provided their training skills have been assessed. If required, an individual training plan should be established covering specific training skills. Records should be kept of such training, and of the assessment, as appropriate.

AMC2 147.B.200(a)(3) Management system**QUALIFICATION AND TRAINING — INSPECTORS**

- (a) Competent authority inspectors should have:
- (1) practical experience and expertise in the application of aviation safety standards and safe operating practices;
 - (2) comprehensive knowledge of:
 - (i) relevant parts of implementing rules, certification specifications and guidance material;
 - (ii) the competent authority's procedures;
 - (iii) the rights and obligations of an inspector;
 - (iv) quality and safety management systems;
 - (v) continuing airworthiness management;
 - (vi) maintenance related human factors and human performance principles;
 - (3) training on auditing techniques and assessing and evaluating safety management systems;
 - (4) five years relevant work experience to be allowed to work as an inspector independently. This may include experience gained during training to obtain the qualification referred to in (a)(5);
 - (5) a relevant engineering degree or an aircraft maintenance technician qualification with additional education. 'Relevant engineering degree' means an engineering degree from aeronautical, mechanical, electrical, electronic, avionic or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components;
 - (6) knowledge of a relevant sample of aircraft types; and
 - (7) knowledge of maintenance training standards.
- (b) In addition to technical competency, inspectors should have a high degree of integrity, be impartial in carrying out their tasks, be tactful, and have a good understanding of human nature.
- (c) A programme for recurrent training should be developed that ensures that the inspectors remain competent to perform their allocated tasks.

AMC3 147.B.200(a)(3) Management system**INITIAL AND RECURRENT TRAINING**

- (a) Initial training programme:

The initial training programme for inspectors should include, as appropriate to their role,

current knowledge, experience and skills in, at least, all of the following:

- (1) aviation legislation, organisation, and structure;
- (2) the Chicago Convention, relevant ICAO annexes and documents;
- (3) the applicable requirements and procedures;
- (4) management systems, including auditing, risk assessment, and reporting techniques;
- (5) Safety Management Systems, and the evaluation of such systems;
- (6) human factors principles;
- (7) rights and obligations of inspecting personnel of the competent authority;
- (8) 'on-the-job' training; and
- (9) suitable technical training appropriate to the role and tasks of the inspector, in particular for those areas requiring approvals.

(b) Recurrent training programme:

The recurrent training programme should reflect, at least, changes in aviation legislation and industry. The programme should also cover the specific needs of the inspectors and the competent authority and significant issues identified by the State Safety Programme or the European Aviation Safety plan (EASp).

AMC4 147.B.200(a)(3) Management system

COMPETENCE ASSESSMENT

The competent authority should periodically assess the competence of its inspectors. The results of such assessment, as well as any actions taken following such assessment, should be recorded.

AMC1 147.B.200(d) Management system

PROCEDURES AVAILABLE TO THE AGENCY

- (a) Copies of the procedures related to the competent authority's management system, and their amendments to be made available to the Agency for the purpose of standardisation should provide at least the following information:
- (1) Regarding continuing oversight functions undertaken by the competent authority, the competent authority's organisational structure with description of the main processes. This information should demonstrate the allocation of responsibilities within the competent authority, and that the competent authority is capable of carrying out the full range of tasks regarding the size and complexity of the Member State's aviation industry. It should also consider overall proficiency and authorisation scope of competent authority personnel.
 - (2) For personnel involved in oversight activities, the minimum professional qualification requirements and experience and principles guiding appointment (e.g. assessment).
 - (3) How the following are carried out: assessing applications and evaluating compliance, issuance of certificates, performance of continuing oversight, follow-up of findings, enforcement measures and resolution of safety concerns.
 - (4) Principles of managing exemptions and derogations.

- (5) Processes in place to disseminate applicable safety information for timely reaction to a safety problem.
 - (6) Criteria for planning continuing oversight (oversight programme), including adequate management of interfaces when conducting continuing oversight (air operations, continuing airworthiness management for example).
 - (7) Outline of the initial training of newly recruited oversight personnel (taking future activities into account), and the basic framework for continuation training of oversight personnel.
- (b) As part of the continuous monitoring of a competent authority, the Agency may request details of the working methods used, in addition to the copy of the procedures of the competent authority's management system (and amendments). These additional details are the procedures and related guidance material describing working methods for competent authority personnel conducting oversight.
- (c) Information related to the competent authority's management system may be submitted in electronic format.

147.B.205 Allocation of tasks to qualified entities

- (a) Tasks related to the initial certification, or continuing oversight of persons, or organisations subject to Regulation (EC) No 216/2008 and its Implementing Rules shall be allocated by Member States only to qualified entities. When allocating tasks, the competent authority shall ensure that it has:
- (1) put a system in place to initially and continuously assess that the qualified entity complies with Annex V to Regulation (EC) No 216/2008;
This system and the results of the assessments shall be documented.
 - (2) established a documented agreement with the qualified entity, approved by both parties at the appropriate management level, which clearly defines:
 - (i) the tasks to be performed;
 - (ii) the declarations, reports, and records to be provided;
 - (iii) the technical conditions to be met in performing such tasks;
 - (iv) the related liability coverage; and
 - (v) the protection given to information acquired in carrying out such tasks.
- (b) The competent authority shall ensure that the internal audit process and safety risk management process required by 147.B.200(a)(4) covers all certification, or continuing oversight tasks performed on its behalf.

GM1 147.B.205 Allocation of tasks to qualified entities

CERTIFICATION TASKS

The tasks that may be performed by a qualified entity on behalf of the competent authority include those related to the initial certification and continuing oversight of persons and organisations as defined in this Regulation, with the exclusion of the issuance of certificates, licences, ratings, or approvals.

147.B.210 Changes in the management system

- (a) The competent authority shall have a system in place to identify changes that affect its capability to perform its tasks and discharge its responsibilities as defined in Regulation (EC) No 216/2008 and its Implementing Rules. This system shall enable it to take action as appropriate to ensure that its management system remains adequate and effective.
- (b) The competent authority shall update its management system to reflect any change to Regulation (EC) No 216/2008 and its Implementing Rules in a timely manner, so as to ensure effective implementation.
- (c) The competent authority shall notify the Agency of changes affecting its capability to perform its tasks and discharge its responsibilities as defined in Regulation (EC) No 216/2008 and its Implementing Rules.

147.B.220 Record keeping

- (a) The competent authority shall establish a system of record keeping that allows adequate storage, accessibility, and reliable traceability of:
 - (1) the competent authority's management system's documented policies and procedures;
 - (2) training, qualification, and authorisation of competent authority personnel;
 - (3) the allocation of tasks, covering the elements required by 147.B.205, as well as the details of tasks allocated; and
 - (4) certification processes, and continuing oversight of certified organisations, including:
 - (i) the application for an organisation certificate;
 - (ii) the competent authority continuing oversight programme, including all audit and inspection records;
 - (iii) the organisation approval certificate, including any change thereto;
 - (iv) a copy of the oversight programme listing the dates when audits are due and when audits were carried out;
 - (v) copies of all formal correspondence, including EASA Form 4 or equivalent;
 - (vi) details of findings, corrective actions, date of action closure, exemption and enforcement action(s);
 - (vii) any audit and inspection reports issued by other competent authority; and
 - (viii) copies of all maintenance organisation expositions and amendments thereto;
 - (5) the evaluation and notification to the Agency of alternative means of compliance proposed by organisations, and the assessment of alternative means of compliance used by the competent authority itself;
 - (6) safety information and follow-up measures in accordance with 145.B.135; and
 - (7) the use of flexibility provisions in accordance with Article 14 of Regulation (EC) No 216/2008.
- (b) The competent authority shall maintain a list of all organisation certificates it issued.
- (c) The minimum retention period for the above records shall be four years subject to applicable data protection law.

AMC1 147.B.220 Record keeping**GENERAL**

- (a) The record keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organised in a consistent way that ensures traceability and retrievability throughout the required retention period.
- (b) All records containing sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure confidentiality of this kind of data.
- (c) Records should be kept in paper form, or in electronic format, or a combination of both media. Records stored on microfilm or optical disc form are also acceptable. The records should remain legible and accessible throughout the required retention period. The retention period starts when the record has been created.
- (d) Paper systems should use robust material, which can withstand normal handling and filing. Computer systems should have, at least, one backup system which should be updated within 24 hours of any new entry. Computer systems should include safeguards against unauthorised alteration of data.
- (e) All computer hardware used to ensure data backup should be stored in a different location from that containing the working data, in an environment that ensures they remain in good condition. When hardware or software changes take place special care should be taken to ensure that all necessary data continue to be accessible at least through the full period specified in 147.B.220.

AMC1 147.B.220(a)(1) Record keeping**COMPETENT AUTHORITY MANAGEMENT SYSTEM**

Records related to the competent authority's management system should include, as a minimum and as applicable:

- (a) the documented policies and procedures;
- (b) the personnel files of competent authority personnel, with supporting documents related to training and qualifications;
- (c) the results of the competent authority's internal audit and safety risk management processes, including audit findings, corrective and preventive actions; and
- (d) the contract(s) established with qualified entities performing certification or oversight tasks on behalf of the competent authority.

AMC1 147.B.220(a)(4) Record keeping**ORGANISATIONS**

Records related to an organisation certified by the competent authority should include, as appropriate to the type of organisation:

- (a) the application for an organisation approval;
- (b) the documentation based on which the approval has been granted and any amendments to that documentation;
- (c) the organisation approval certificate including any changes;
- (d) a copy of the continuing oversight programme listing the dates when audits are due and when such audits were carried out;

- (e) continuing oversight records including all audit and inspection records;
- (f) copies of all relevant correspondence;
- (g) details of any exemption and enforcement actions;
- (h) any report from other competent authorities relating to the oversight of the organisation;
and
- (i) a copy of any other document approved by the competent authority.

GM1 147.B.220 Record keeping**GENERAL**

Records are required to document results achieved, or to provide evidence of activities performed. Records become factual when recorded. Therefore, they are not subject to version control. Even when a new record is produced covering the same issue, the previous record remains valid.

GM1 147.B.220(a)(4) Record-keeping**ORGANISATIONS - DOCUMENTATION**

Documentation to be kept as records in support of the approval include the management system documentation, including any technical manuals, such as the maintenance training organisation exposition, that have been submitted with the initial application, and any amendments to these documents.

SUBPART B ISSUE OF AN APPROVAL

~~This Subpart provides the requirements to issue or vary the maintenance training organisation approval.~~

SUBPART C – OVERSIGHT, CERTIFICATION, AND ENFORCEMENT**147.B.300 Oversight principles**

- (a) The competent authority shall verify:
- (1) compliance with the requirements applicable to organisations prior to the issue of an organisation certificate or approval, as applicable;
 - (2) continued compliance with the applicable requirements of organisations it has certified; and
 - (3) implementation of appropriate safety measures mandated by the competent authority as defined in 147.B.135(c) and (d).
- (b) This verification shall:
- (1) be supported by documentation specifically intended to provide personnel responsible for safety oversight with guidance to perform their functions;
 - (2) provide the organisations concerned with the results of safety oversight activity;
 - (3) be based on audits and inspections, including unannounced inspections; and
 - (4) provide the competent authority with the evidence needed in case further action is required, including the measures foreseen by 147.B.350 'Findings'.
- (c) The scope of oversight defined in (a) and (b) shall take into account the results of past oversight activities and the safety priorities.
- (d) Where organisation facilities are located in more than one State, the competent authority responsible for the certificate as defined in (a) may agree to have oversight tasks performed by the competent authority(ies) of the Member State(s) where facilities are located or by the Agency for facilities not located in a Member State. Any organisation subject to such agreement shall be informed of its existence and of its scope.
- (e) For oversight performed at facilities located in another State, the competent authority responsible for the certificate as defined in (a) shall inform the competent authority of such State, or the Agency for facilities not located in a Member State, before performing any on-site audit, or inspection of such facilities.
- (f) The competent authority shall collect and process any information deemed useful for oversight, including for unannounced inspections.

~~147.B.120 Continued validity procedure~~

- ~~(a) Each organisation shall be completely audited for compliance with this Annex (Part 147) at periods not exceeding 24 months. This shall include the monitoring of at least one training course and one examination performed by the maintenance training organisation.~~
- ~~(b) Findings shall be processed in accordance with 147.B.130.~~

AMC 147.B.120(a) — Continued validity procedure

1. Audits should be conducted to ensure the continuity of the approval; it is not necessary to sample all basic and type training courses, but the competent authority should sample, as appropriate, one basic and one type training course to establish that training is conducted in an appropriate manner. Nevertheless, the duration of the sampling for each course should not be less than 3 hours. Where no training course is being conducted during the audit, arrangements should be made to return at a later date to sample the conduct of a training course.
2. It is not necessary to sample all examinations associated with a training course but the competent authority should sample, as appropriate, one basic and one type training course examination.

147.B.305 Oversight programme

- (a) The competent authority shall establish and maintain an oversight programme covering the oversight activities required by 147.B.300.
- (b) For organisations certified by the competent authority, the oversight programme shall be developed taking into account the specific nature of the organisation, the complexity of its activities, the results of past certification and/or oversight activities, and shall be based on the assessment of associated risks. It shall include within each oversight planning cycle:
 - (1) audits and inspections, including unannounced inspections;
 - (2) meetings convened between the accountable manager and the competent authority to ensure both remain informed of significant issues.
 - (3) the observation of at least one training course and one examination performed; and
- (c) For organisations certified by the competent authority, an oversight planning cycle not exceeding 24 months shall be applied.

The oversight planning cycle may be reduced if there is evidence that the safety performance of the organisation has decreased.

- (d) The oversight planning cycle may be extended to a maximum of 36 months if the competent authority has established that during the previous 24 months:
 - (1) the organisation has demonstrated an effective identification of aviation safety hazards and management of associated risks;
 - (2) the organisation has continuously demonstrated under 147.A.130 that it has full control over all changes;
 - (3) no level 1 findings have been issued; and
 - (4) all corrective actions have been implemented within the time period accepted or extended by the competent authority as defined in 147.B.350(d)(2).

The oversight planning cycle may be further extended to a maximum of 48 months if, in addition to the above, the organisation has established, and the competent authority has approved, an effective continuous reporting system to the competent authority on the safety performance and regulatory compliance of the organisation itself.

- (e) The oversight programme shall include records of the dates when audits, inspections, and meetings are due, and when such audits, inspections, and meetings have been carried out.

- (f) At the completion of each oversight planning cycle the competent authority shall issue a recommendation report on the continuation of the approval which shall consider possible limitations to the terms of approval on the basis of the results of oversight and the volume of activities for the different ratings during the completed oversight cycle.

AMC1 147.B.305(a);(b) Oversight programme**ANNUAL REVIEW**

- (a) The oversight planning cycle and related oversight programme for each organisation should be reviewed annually to ensure they remain adequate with regard to any changes in the nature, complexity, or safety performance of the organisation.
- (b) When reviewing the oversight planning cycle and related oversight programme, the competent authority should also consider any relevant information collected in accordance with 147.B.300(f).

AMC1 145.B.305(b) Oversight programme**SPECIFIC NATURE AND COMPLEXITY OF THE ORGANISATION, RESULTS OF PAST OVERSIGHT**

When determining the oversight programme for an organisation, the competent authority should consider, in particular, the following elements, as applicable:

- (a) the effectiveness of the organisation's management system in identifying and addressing non-compliances and safety hazards;
- (b) the implementation by the organisation of industry standards, directly relevant to the organisation's activity subject to this Regulation;
- (c) the procedure applied for, and scope of changes not requiring prior approval;
- (d) specific procedures implemented by the organisation related to any alternative means of compliance used;
- (e) if applicable, the number of approved locations and the activities performed at each location; and
- (f) the volume of activity for each sub-category and aircraft type in terms of basic training, aircraft type training, and examinations, as applicable.

AMC2 147.B.305(b) Oversight programme**INDUSTRY STANDARDS**

- (a) For organisations having demonstrated compliance with industry standards, the competent authority may adapt its oversight programme in order to avoid duplication of specific audit items.
- (b) Demonstrated compliance with industry standards, such as ISO 9000 series or EN 9110, should not be considered in isolation from the other elements to be considered for the competent authority's risk-based oversight.
- (c) In order to be able to credit any audits performed as part of certification in accordance with industry standards, the following should be considered:
- (1) the demonstration of compliance is based on certification auditing schemes providing for independent and systematic verification;

- (2) the existence of an accreditation scheme and accreditation body for certification in accordance with the industry standards has been verified;
- (3) certification audits are relevant to the requirements defined in Part-145 and other Parts as applicable;
- (4) the scope of such certification audits can easily be mapped against the scope of oversight in accordance with Part-147;
- (5) audit results are accessible to the competent authority and open to exchange of information in accordance with Article 15(1) of Regulation (EC) No 216/2008; and
- (6) the audit planning intervals of certification audits, in accordance with industry standards, are compatible with the oversight planning cycle.

AMC1 147.B.305(b)(1) Oversight programme**AUDIT**

- (a) Where the competent authority has decided that a series of on-site audits are necessary to arrive at a complete audit of an organisation, the programme should indicate which aspects of the approval will be covered during each on-site audit.
- (b) It is recommended that the audit concentrates on two aspects of the Part-147 approval:
 - (1) the organisation's compliance monitoring based on the reports produced by the compliance monitoring function to determine if the organisation is identifying, controlling and correcting non-compliances, and controlling concessions granted by the compliance monitoring manager for deviations from the organisation's procedures; and
 - (2) the organisation's safety management processes to determine how effectively the organisation is managing safety risks.
- (c) At the successful conclusion of the audit, including approval of changes to the maintenance training organisation exposition, if relevant, an audit report should be issued by the auditing inspector including all recorded findings, closure, actions, and recommendation.
- (d) At the completion of each oversight planning cycle a new EASA Form 22 should be issued.

AMC1 147.B.305(b)(3) Oversight programme**SAMPLING OF TRAINING COURSES AND EXAMINATIONS FOR OBSERVATION**

- (a) It is not necessary to sample all basic and type training courses but the competent authority should sample within each oversight planning cycle, as appropriate, one basic and one type training course for the purpose of observation to establish that training is conducted in an appropriate manner. Nevertheless, the duration of the observation for each course should not be less than three hours. Where no training course is being conducted during the audit, arrangements should be made to return at a later date to perform the observation during the conduct of a training course.
- (b) It is not necessary to sample all examinations associated with a training course but the competent authority should sample within each oversight planning cycle, as appropriate, one basic and one type training course examination for the purpose of observation.

AMC1 147.B.305(c) Oversight programme**OVERSIGHT PLANNING CYCLE**

- (a) When determining the oversight planning cycle and defining the oversight programme, the competent authority should assess the risks related to the activity of each organisation and adapt the oversight to the level of risk identified, and to the organisation's ability to effectively manage safety risks.
- (b) The competent authority should establish a schedule of audits and inspections appropriate to each organisation. The planning of audits and inspections should take into account the results of the hazard identification and risk assessment conducted and maintained by the organisation as part of the organisation's management system. Inspectors should work in accordance with the schedule provided to them.
- (c) When the competent authority, having regard to an organisation's safety performance, varies the frequency of an audit or inspection, it should ensure that all aspects of the organisation's activity are audited and inspected within the applicable oversight planning cycle.

AMC2 147.B.305(c) Oversight programme**OVERSIGHT PLANNING CYCLE**

- (a) For each organisation certified by the competent authority, all processes should be completely audited at periods not exceeding the applicable oversight planning cycle. The beginning of the first oversight planning cycle is normally determined by the date of issue of the first certificate. If the competent authority wishes to align the oversight planning cycle with the calendar year, it should shorten the first oversight planning cycle accordingly.
- (b) The interval between two audits for a particular process should not exceed the interval of the applicable oversight planning cycle.
- (c) Audits should include at least one on-site audit within each oversight planning cycle. For organisations exercising their regular activity at more than one site, the determination of the sites to be audited should consider the results of past oversight, the volume of activity at each site, as well as main risk areas identified.
- (d) For organisations holding more than one certificate, the competent authority may define an integrated oversight schedule to include all applicable audit items. In order to avoid duplication of audits, credit may be granted for specific audit items already completed during the current oversight planning cycle, subject to four conditions:
 - (1) the specific audit item should be the same for all certificates under consideration;
 - (2) there should be satisfactory evidence on record that such specific audit items were carried out, and that all corrective actions have been implemented to the satisfaction of the competent authority;
 - (3) the competent authority should be satisfied that there is no reason to believe standards have deteriorated in respect of those specific audit items being granted a credit; and
 - (4) the interval between two audits for the specific item being granted a credit should not exceed the applicable oversight planning cycle.

AMC1 147.B.305(d) Oversight programme**EXTENSION OF THE OVERSIGHT PLANNING CYCLE BEYOND 24 MONTHS**

- (a) Where the competent authority applies an oversight planning cycle that exceeds 24 months, it should perform, at a minimum, one oversight programme validation inspection of the organisation within each 12-month segment of the applicable oversight planning cycle.
- (b) In case the results of this inspection indicate a decrease in the safety performance of the organisation, the competent authority should revert back to a 24-month oversight planning cycle and review the oversight programme accordingly.

AMC2 147.B.305(d) Oversight programme**EXTENSION OF THE OVERSIGHT PLANNING CYCLE BEYOND 36 MONTHS**

In order to be able to apply an oversight planning cycle up to 48 months, the competent authority should:

- (a) determine the format and contents of the regular reports to be made by the organisation on its safety performance.
- (b) have implemented a methodology to evaluate the safety performance of the organisation, focussing on the organisation's ability to effectively identify aviation safety hazards and manage the associated risks.

GM1 147.B.305 Oversight programme**TERMINOLOGY**

- (a) 'Audit' means a systematic, independent, and documented process for obtaining evidence and evaluating it objectively to determine the extent to which requirements are complied with.
- (b) 'Inspection' means an independent documented conformity evaluation by observation and judgement accompanied as appropriate by measurement, testing, or gauging in order to verify compliance with applicable requirements.
- (c) 'Oversight planning cycle' means the timeframe within which all areas of the approval and all processes should be reviewed by means of audits and inspections.
- (d) 'Oversight programme' means the detailed oversight schedule defining the number of audits and inspections, the scope and duration of each audit and inspection, including details on product audits and locations, as appropriate, and the tentative timeframe for performing each audit and inspection.

~~147.B.110 Procedure for approval and changes to the approval~~

- ~~(a) Upon receipt of an application, the competent authority shall:
 - 1. review the maintenance training organisation exposition, and
 - 2. verify the organisation's compliance with the requirement of Annex IV (Part 147).~~
- ~~(b) All findings identified shall be recorded and confirmed in writing to the applicant.~~
- ~~(c) All findings shall be closed in accordance with point 147.B.130 before the approval is issued.~~
- ~~(d) The reference number shall be included on the approval certificate in a manner specified by~~

the Agency.

~~AMC 147.B.110(a) Procedure for approval and changes to the approval~~

- ~~1 The audit should be conducted on the basis of checking the facility for compliance, interviewing personnel and sampling any relevant training course for its conduct and standard.~~
- ~~2 The audit report should be made on an EASA Form 22 (see appendix III).~~

~~AMC 147.B.110(b) Procedure for approval and changes to the approval~~

~~The date each finding was rectified should be recorded together with the reference document.~~

147.B.310 Initial certification procedure

- (a) Upon receiving an application for the initial issue of a certificate for an organisation, the competent authority shall verify the organisation's compliance with the applicable requirements.
- (b) A meeting with the accountable manager of the organisation shall be convened at least once during the investigation for initial certification to ensure that he/she fully understands the significance of the certification process, and the reason for signing the commitment in the maintenance organisation exposition for compliance with the procedures specified in the exposition.
- (c) The competent authority shall record all findings, closure actions (actions required to close a finding), and recommendations.
- (d) The competent authority shall confirm all findings raised during the verification in writing to the organisation. For initial certification, all findings must be corrected to the satisfaction of the competent authority before the certificate can be issued.
- (e) When satisfied that the organisation is in compliance with the applicable requirements, the competent authority shall:
 - (1) issue the certificate as established in Appendix II;
 - (2) formally indicate its acceptance of the personnel, specified in 147.A.105 (a) and (b), to the applicant in writing; and
 - (3) formally approve the maintenance training organisation exposition.
- (f) The certificate reference number shall be included on the EASA Form 11 in a manner specified by the Agency.
- (g) The certificate shall be issued for an unlimited duration. The privileges and scope of the activities that the organisation is approved to conduct, including any limitations as applicable, shall be specified in the approval schedule attached to the certificate.
- (h) To enable an organisation to implement changes without prior competent authority approval in accordance with 147.A.150(c), the competent authority shall approve the procedure submitted by the organisation defining the scope of such changes and describing how such changes will be managed and notified.

AMC1 147.B.310(a) Initial certification procedure

VERIFICATION OF COMPLIANCE

- (a) In order to verify the organisation's compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, including interviews of personnel, and inspections carried out at the organisation's facilities.
- (b) The competent authority should only conduct such audit after being satisfied that the application shows compliance with the applicable requirements.
- (c) The audit should focus on the following areas:
 - (1) detailed management structure, including names and qualifications of personnel required by 147.A.105 (a) to (c), and adequacy of the organisation and management structure;
 - (2) personnel:
 - (i) adequacy of number and qualifications with regard to the intended approval schedule, and associated privileges; and
 - (ii) validity of licences, ratings, certificates, or attestations as applicable;
 - (3) processes for safety risk management and compliance monitoring;
 - (4) facilities — adequacy with regard to the organisation's scope of approval; and
 - (5) documentation based on which the certificate should be granted (documentation as required by 147.A.130(a)(5) and 147.A.140):
 - (i) verification that the procedures specified in the maintenance training organisation exposition comply with the applicable requirements; and
 - (ii) verification that the accountable manager signs the commitment statement.
- (d) In cases where an application for an organisation certificate is refused, the applicant should be informed of the right of appeal as exists under national law.

AMC2 147.B.310(a) Initial certification procedure**VERIFICATION OF COMPLIANCE**

For smaller maintenance training organisations, meaning organisations with the capacity to provide training for less than 50 students at the same time, allowed to combine any or all of the 147.A.105 subparagraph (a) and (b) positions (accountable manager, training manager, examination manager), the competent authority should also verify that all functions can be properly carried out in combination.

~~AMC1 147.B.310(a);(b) GM to 147.B.110~~ Initial certification procedure ~~Procedure for approval and changes to the approval~~

- (a) A meeting should be arranged between the applicant and the ~~Member State~~ competent authority ~~who issues Part-147 approvals~~ to determine if the applicant's training activities justify the investigation for issue of a Part-147 certificate approval and to ensure that the applicant understands what needs to be done for a Part-147 certificate approval. This meeting is not intended to establish compliance but rather to see if the activity is a Part-147 activity.
- (b) Assuming that the applicant's activities ~~fall~~ come within the scope of a Part-147 certificate approval, instructions should be sent to the competent authority staff requesting that an on-site audit of the applicant be carried out and when satisfied that compliance has been established, a recommendation for the issue of a Part-147 certificate approval should be

submitted to the competent authority staff who grant approval unless these are the same staff. The competent authority should determine how and by whom the on-site audit shall be conducted. For example, if the applicant is a large training organisation, it will be necessary to determine whether one large team audit or a short series of small team audits or a long series of single inspector person audits are is most appropriate for the particular situation. A further consideration in the case of a combined Part-145/147 organisation is the possibility to combine the audits.

- (c) Where approval is requested to it is intended that the maintenance training organisation may conduct training and/or examinations away from the maintenance training organisation address(es) location(s) in accordance with 147.A.145(c), then a sample audit should be carried out by the competent authority from time to time of the process to ensure that procedures are followed. Such sample audit should be performed within the first six months from the date of the initial issue of the Part-147 certificate and thereafter be programmed at least twice within each oversight planning cycle.
- (d) For practical reasons such sample audits will need to be carried out when training is being conducted away from the maintenance training organisation address(es) location(s).
- (e) The competent authority auditing inspector surveyor should always ensure that he/she is they are always accompanied throughout the audit by a senior member of the organisation making application for Part 147 approval. Normally this is should be the proposed compliance monitoring manager quality manager. The reason for him/her being accompanied is to ensure the organisation is fully aware of any findings during the audit. The reason for being accompanied is to ensure that the organisation is fully aware of any findings during the audit. In any case, the proposed quality manager/senior member of the organisation should be debriefed at the end of the audit visit on the findings made during the audit.

The auditing inspector should inform the compliance monitoring manager/senior member of the organisation at the end of the audit of all findings made during the audit.

- (f) There will be occasions when the auditing inspector surveyor may finds situations in the applicant's organisation on which he/she is unsure about compliance. In this case, the organisation should be informed about possible non-compliance at the time of audit and the fact that the situation will be reviewed within the competent authority before a decision is made. The organisation should be informed of the decision within 2 weeks of the audit visit in writing if the decision is a confirmation of non-compliance. If the decision is a finding of being in compliance, a verbal confirmation to the organisation should will suffice.
- (g) All findings should be confirmed in writing to the applicant within 2 weeks of the on-site audit.
- (g) A change of name of the maintenance training organisation requires the organisation to submit a new application as a matter of urgency stating that only the name of the organisation has changed including a copy of the organisation exposition with the new name. Upon receipt of the application and the organisation exposition, the competent authority should reissue the approval certificate valid only up to the current expiry date.
- (h) A name change alone does not require the competent authority to audit the organisation, unless there is evidence that other aspects of the maintenance training organisation have changed.

- ~~(i) A change of accountable manager requires the maintenance training organisation to submit such fact to the competent authority as a matter of urgency together with the amendment to the accountable manager exposition statement.~~
- ~~(j) A change of any of the senior personnel specified in 147.A.105(b) requires the maintenance training organisation to submit a Form 4 in respect of the particular person. If satisfied that the qualifications and experience meet the standard required by Part 147, the competent authority should indicate acceptance in writing to the maintenance training organisation.~~
- ~~(k) A change in the maintenance training organisation's exposition requires the competent authority to establish that the procedures specified in the exposition are in compliance with Part 147 and then to establish if these are the same procedures intended for use within the training facility.~~
- ~~(l) Any change of location of the maintenance training organisation requires the organisation to make a new application to the competent authority together with the submission of an amended exposition. The competent authority should follow the procedure specified in 147.B.110 (a) and (b) in so far as the change affects such procedure before issuing a new Part 147 approval certificate.~~
- ~~(m) The complete or partial reorganisation of a training organisation should require the re-audit of those elements that have changed.~~
- ~~(n) Any additional basic or aircraft type training courses requires the maintenance training organisation to make a new application to the competent authority together with the submission of an amended exposition. For basic training extensions, an additional sample of new examination questions relevant to the modules associated with the extension being sought will be required to be submitted. The competent authority should follow the procedure of paragraph 11 in so far as the change affects such procedures unless the competent authority is satisfied that the maintenance training organisation has a well-controlled procedure to qualify such change when it is not necessary to conduct the audit elements of the paragraph 11 procedure.~~

AMC1 147.B.310(c) Initial certification procedure**AUDIT REPORT**

- (a) The audit should be recorded using the audit report EASA Form 22 (see Appendix III).
- (b) A quality review of the audit report EASA Form 22 should be carried out by a competent independent person nominated by the competent authority. The review should take into account the relevant paragraphs of Part-147, the categorisation of finding levels, and the closure action taken. Satisfactory review of the audit report should be indicated by a signature on the form.
- (c) The final report should include the date each finding was closed together with a reference to the competent authority report or letter that confirmed the closure.

~~147.B.120 Continued validity procedure~~

- ~~(a) Each organisation shall be completely audited for compliance with this Annex (Part-147) at periods not exceeding 24 months. This shall include the monitoring of at least one training course and one examination performed by the maintenance training organisation.~~
- ~~(b) Findings shall be processed in accordance with 147.B.130.~~

~~2. AMC 147.B.120(a) Continued validity procedure~~

- ~~(a) Audits should be conducted to ensure the continuity of the approval; it is not necessary to sample all basic and type training courses, but the competent authority should sample, as appropriate, one basic and one type training course to establish that training is conducted in an appropriate manner. Nevertheless, the duration of the sampling for each course should not be less than 3 hours. Where no training course is being conducted during the audit, arrangements should be made to return at a later date to sample the conduct of a training course.~~
- ~~(b) It is not necessary to sample all examinations associated with a training course but the competent authority should sample, as appropriate, one basic and one type training course examination.~~

~~147.B.125 Maintenance training organisation approval certificate~~

~~The maintenance training organisation approval certificate format shall be as detailed in Appendix II~~

147.B.315 Disqualification of knowledge examiners

- (a) Upon receiving a notification of any knowledge examiner found during a knowledge examination to be providing question answers to any student, the competent authority shall assess the particular incident and determine if and when the disqualified examiner may be reinstated.
- (b) The competent authority shall inform the organisation accordingly in writing.

147.B.330 Changes

- (a) Upon receiving an application for a change that requires prior approval, the competent authority shall verify the organisation's compliance with the applicable requirements before issuing the approval.
- (b) The competent authority shall prescribe the conditions under which the organisation may operate during the change unless the competent authority determines that the organisation's certificate needs to be suspended.
- (c) When satisfied that the organisation is in compliance with the applicable requirements, the competent authority shall approve the change.
- (d) Without prejudice to any additional enforcement measures, when the organisation implements changes requiring prior approval without having received competent authority approval as defined in (c), the competent authority shall suspend, limit, or revoke the organisation's certificate.
- (e) For changes not requiring prior approval, the competent authority shall assess the information provided in the notification sent by the organisation in accordance with

147.A.150(c) to verify compliance with the applicable requirements. In case of any non-compliance, the competent authority shall:

- (1) notify the organisation about the non-compliance and request further changes; and
- (2) in case of level 1 or level 2 findings, act in accordance with 147.B.350 'Findings'.

AMC1 147.B.330 Changes

GENERAL

- (a) Changes in nominated persons:

The competent authority should be informed of any changes to personnel specified in Part-147 that may affect the certificate or terms of approval/approval schedule attached to it.

When an organisation submits the name of a new nominee for any of the management personnel specified in 147.A.105(b) and (c), the competent authority may require the organisation to produce a written résumé of the proposed person's qualifications, in addition to the EASA Form 4 to be provided, as applicable. The competent authority should reserve the right to interview the nominee or call for additional evidence of his/her suitability before deciding upon his/her acceptability.

- (b) A simple management system documentation status sheet should be maintained, which contains information on when an amendment was received by the competent authority and when it was approved.
- (c) The organisation should provide each management system documentation amendment to the competent authority, including for the amendments that do not require prior approval by the competent authority.
- (d) Where the amendment requires competent authority approval, the competent authority, when satisfied, should indicate its approval in writing. Where the amendment does not require prior approval, the competent authority should acknowledge receipt in writing within 10 working days.
- (e) For changes requiring prior approval, in order to verify the organisation's compliance with the applicable requirements, the competent authority should conduct an audit of the organisation, limited to the extent of the changes, and determine the need for a safety risk assessment to be provided by the organisation. If a safety risk assessment is deemed necessary, the competent authority should inform the organisation accordingly. If required for verification, the audit should include interviews and inspections carried out at the organisation's facilities. If requested, the competent authority should assess the results of the safety risk assessment provided by the organisation.
- (f) The applicable part(s) of the EASA Form 22 should be used to document the assessment of changes to the Part-147 approval.

GM1 147.B.330 Changes

CHANGE OF NAME OF THE ORGANISATION

- (a) On receipt of the application and the amendment to the relevant parts of the documentation required in accordance with 147.A.130(a)(5) and 147.A.140 the competent authority should reissue the certificate.

- (b) A name change alone does not require the competent authority to audit the organisation unless there is evidence that other aspects of the organisation have changed.

147.B.130 Findings

- (a) Failure to complete the rectification of any level 1 finding within three days of written notification shall entail revocation, suspension or limitation by the competent authority, of the maintenance training organisation approval in whole or in part.
- (b) Action shall be taken by the competent authority to revoke, limit or suspend in whole or part the approval in case of failure to comply within the time scale granted by the competent authority in the case of a level 2 finding.

AMC 147.B.130(b) Findings

1. In the case of a level 2 finding, the competent authority may give up to 6 months notice of the need for rectification. Dependent upon the seriousness of the level 2 finding(s) the competent authority may choose a notice period less than 6 months.
2. When the competent authority chooses to allow 6 months, the initial notification should be of 3 months duration to the quality manager followed by the final 3 months notice to the accountable manager.

147.B.350 Findings and corrective actions

- (a) The competent authority shall have a system to analyse findings for their safety significance.
- (b) A level 1 finding shall be issued by the competent authority when any significant non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation's procedures and manuals, or with the terms of an approval or certificate which lowers safety or seriously hazards flight safety.

The level 1 findings shall include:

- (1) any significant non compliance with the training or the examination process;
 - (2) failure to give the competent authority access to the organisation's facilities as defined in 147.A.157 during normal operating hours and after two written requests;
 - (3) obtaining or maintaining the validity of the organisation certificate by falsification of submitted documentary evidence;
 - (4) evidence of malpractice or fraudulent use of the organisation certificate; and
 - (5) the lack of an accountable manager.
- (c) A level 2 finding shall be issued by the competent authority when any non-compliance is detected with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules, with the organisation's procedures and manuals, or with the terms of an approval or certificate which could lower safety or hazard flight safety.
- (d) When a finding is detected during oversight or by any other means, the competent authority shall, without prejudice to any additional action required by Regulation (EC) No 216/2008 and its Implementing Rules, communicate the finding to the organisation in writing, and request corrective action to address the non-compliance(s) identified. Where a finding directly relates to an aircraft, the competent authority shall inform the State in which the aircraft is registered.

- (1) In the case of level 1 findings, the competent authority shall take immediate and appropriate action to prohibit or limit activities, and if appropriate, it shall take action to revoke the certificate or to limit or suspend it in whole or in part, depending upon the extent of the level 1 finding until successful corrective action has been taken by the organisation.
- (2) In the case of level 2 findings, the competent authority shall:
 - (i) grant the organisation a corrective action implementation period appropriate to the nature of the finding that in any case initially shall not be more than three months. At the end of this period, and subject to the nature of the finding and past safety performance of the organisation, the competent authority may extend the three-month period subject to a satisfactory corrective action plan agreed by the competent authority; and
 - (ii) assess the corrective action plan proposed by the organisation and, if the assessment concludes that they are sufficient to address the non-compliance(s), accept these.
- (3) Where an organisation fails to submit an acceptable corrective action plan, or to perform the corrective action within the time period accepted or extended by the competent authority, the finding shall be raised to a level 1 finding and action taken as laid down in (d)(1).
- (4) The competent authority shall record all findings it has raised or that have been communicated to it and, where applicable, the enforcement measures it has applied, as well as all corrective actions and date of action closure for findings.
- (e) Without prejudice to any additional enforcement measures, when the authority of a Member State acting under the provisions of 147.B.300(d) identifies any non-compliance with the applicable requirements of Regulation (EC) No 216/2008 and its Implementing Rules by an organisation certified by the competent authority of another Member State or the Agency, it shall inform that competent authority and provide an indication of the level of finding.

SUBPART-C

~~REVOCATION, SUSPENSION AND LIMITATION OF THE MAINTENANCE~~

~~TRAINING ORGANISATION APPROVAL~~

~~147.B.355 147.B.200~~ Suspension, limitation and revocation ~~Revocation, suspension and limitation of the maintenance training organisation approval~~

The competent authority shall:

- (a) ~~suspend~~ an approval on reasonable grounds in the case of potential safety threat;
- (b) suspend, revoke or limit an approval pursuant to 147.B.130 ~~350~~; or
- (c) suspend an approval in case the competent authority's inspectors are unable over a period of 24 months to discharge their oversight responsibilities through on-site audit(s) due to the security situation in the State where the maintenance facilities are located.

AMC1 147.B.355(c) Suspension, limitation and revocation**SECURITY SITUATION IN THE STATE**

- (a) The European Commission Security Directorate would generally advise against any, but essential, travel to a country where hostile conditions, or a combination of such make security precarious, and pose a high level of threat to personnel, as follows:
- (1) international or internal armed conflict with frequent armed confrontation taking place, numerous casualties, and/or serious damages to infrastructures;
 - (2) situation of pre-war, or characterised by high internal or external tensions that could escalate into instability in the short term; very poorly functioning institutions;
 - (3) relatively frequent terrorist attacks due to the presence of active terrorist groups, either domestic or transnational, and state authorities' inability to ensure a satisfactory level of security; and
 - (4) frequent criminal violence targeting also non-nationals. State authorities possess limited ability to counter criminal activities and ensure security.
- (b) Countries falling under the provisions above should be considered as not compatible with the performance of on-site audit by the competent authority.

Appendix II**Maintenance Training and Examination Organisation Certificate Approval-referred to in Annex IV (Part-147) — EASA Form 11**

Page 1 of 2

[MEMBER STATE(*)]

A Member of the European Union (**)

MAINTENANCE TRAINING AND EXAMINATION ORGANISATION ~~APPROVAL~~ CERTIFICATE

Reference: [MEMBER STATE CODE(*)].147.[XXXX]

Pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council and to Commission Regulation (EC) No 2042/2003 for the time being in force and subject to the condition specified below, the [COMPETENT AUTHORITY OF THE MEMBER STATE(*)] hereby certifies:

[COMPANY NAME AND ADDRESS]

as a maintenance training organisation in compliance with Section A of Annex III (Part-147) of Regulation (EC) No 2042/2003, approved to provide training and conduct examinations listed in the attached ~~approval schedule~~ **scope of approval** and issue related certificates of recognition to students using the above references.

CONDITIONS:

1. This ~~certificate approval~~ is limited to that specified in the scope of work section of the approved maintenance training organisation exposition as referred to in Section A of Annex IV (Part-147), and
2. This ~~certificate approval~~ requires compliance with the procedures specified in the approved maintenance training organisation exposition, and
3. This ~~certificate approval~~ is valid whilst the approved maintenance training organisation remains in compliance with Annex IV (Part-147) of Regulation (EC) No 2042/2003.
4. Subject to compliance with the foregoing conditions, this ~~certificate approval~~ shall remain valid for an unlimited duration unless the ~~certificate approval~~ has ~~previously~~ been surrendered, superseded, **limited**, suspended or revoked.

Date of original issue:

Date of this revision:

Revision No:

Signed:

For the competent authority: [COMPETENT AUTHORITY OF THE MEMBER STATE(*)]

EASA Form 11 Issue 3 4

* or EASA if EASA is the competent authority

** Delete for non-EU Member States or EASA

MAINTENANCE TRAINING AND EXAMINATION ORGANISATION

SCOPE OF APPROVAL SCHEDULE

Reference: [MEMBER STATE CODE(*)].147.[XXXX]

Organisation: [COMPANY NAME AND ADDRESS]

CLASS	CATEGORY	LIMITATION	
BASIC (**)	B1 (**)	B1.1(**)	AEROPLANES TURBINE (**)
		B1.2(**)	AEROPLANES PISTON (**)
		B1.3(**)	HELICOPTERS TURBINE (**)
		B1.4(**)	HELICOPTERS PISTON (**)
	B2 (**)	B2 (**)	AVIONICS (**)
	B3 (**)	B3 (**)	PISTON-ENGINE NON-PRESSURISED AEROPLANES 2000 KG MTOM AND BELOW (**)
	A (**)	A.1 (**)	AEROPLANES TURBINE (**)
		A.2 (**)	AEROPLANES PISTON (**)
		A.3 (**)	HELICOPTERS TURBINE (**)
		A.4 (**)	HELICOPTERS PISTON (**)
TYPE TASK ** /	C (**)	4 (**)	[QUOTE AIRCRAFT TYPE] (***)
	B1 (**)	1 (**)	[QUOTE AIRCRAFT TYPE] (***)
	B2 (**)	2 (**)	[QUOTE AIRCRAFT TYPE] (***)
	A (**)	3 (**)	[QUOTE AIRCRAFT TYPE] (***)

This approval schedule is limited to those training **courses** and examinations specified in the scope of **approval work** section of the approved maintenance training organisation exposition.

Maintenance Training Organisation Exposition reference:

.....

Date of ~~original~~ issue:

Date of last revision approved : Revision No:

Signed:

For the competent authority:[COMPETENT AUTHORITY OF THE MEMBER STATE(*)]

EASA Form 11 Issue 3 4

* or EASA if EASA is the competent authority

** Delete as appropriate if the organisation is not approved.

*** Complete with the appropriate rating and limitation.

Appendix III

[no change to EASA Form 148]

2.Type training certificate

The Part-147 training certificate template detailed below is to be used for recognition of completion of either the theoretical elements, the practical elements, or both the theoretical and practical elements of the type rating training course.

The certificate shall indicate the airframe/engine combination for which the training was imparted.

The appropriate references shall be deleted as applicable and the course type box shall detail whether only the theoretical elements or the practical elements were covered or whether theoretical and practical elements were covered.

The training certificate shall clearly identify if the course is a complete course or a partial course (such as an airframe or powerplant or avionic/electrical course) or a difference course based upon the applicant previous experience, for instance A340 (CFM) course for A320 technicians. If the course is not a complete one, the certificate shall identify whether the interface areas have been covered or not.

Page 1 of 1

CERTIFICATE OF RECOGNITION

Certificate Reference: [MEMBER STATE CODE(*)].147.[XXXX].[YYYYY]

The certificate of recognition is issued to:

[NAME]

[DATE and PLACE OF BIRTH]

By:

[COMPANY NAME AND ADDRESS]

Part-147 Approval Reference: [MEMBER STATE CODE(*)].147.[XXXX]

a maintenance training organisation approved to **provide training and**** conduct examinations within its approval schedule and in accordance with Annex IV (Part-147) of Regulation (EC) No 2042/2003.

This certificate confirms that the above named person either successfully passed the theoretical (**) and/or the practical elements (**) of the approved type training course stated below, and the related examinations and/or assessments, or passed the aircraft type examinations in compliance with Regulation (EC) No 216/2008 of the European Parliament and of the Council and to Commission Regulation (EC) No 2042/2003 for the time being in force.

[AIRCRAFT TYPE TRAINING COURSE (**)]

[START and END DATES]

[specify theoretical elements and/or practical elements]

~~(and/or)~~

[AIRCRAFT TYPE EXAMINATION(**)]

[END DATE]

Date:

Signed:

For: [COMPANY NAME]

EASA Form 149 Issue ± 2

* or EASA if EASA is the competent authority

** Delete as appropriate.

PART 147
APPENDICES TO AMCs

APPENDIX I

Maintenance training organisation exposition (MTOE)

1. The following subject headings form the basis of the MTOE required by 147.A.140.
2. Whilst this format is recommended, it is not mandatory to assemble the MTOE in this manner as long as a cross-reference index is included in the MTOE as an Appendix and the Part 1 items remain in Part 1.
3. Part 2, 3 and 4 material may be produced as separate detailed manuals subject to the main exposition containing the Part 2, 3 and 4 fundamental principles and policy on each item. ~~It is then permitted to delegate the approval of these separate manuals to the senior person but this fact and the procedure should be specified in paragraph 1.10.~~
4. ~~Where an organisation is approved in accordance with any other Part(s) which require an exposition, it is acceptable to combine the exposition requirements by merging the Part 1 items and adding the Parts 2, 3 and 4. When this method is used, it is essential to include the cross reference index of Part 4 item 4.3.~~

PART 1 – MANAGEMENT GENERAL

- 1.1. Safety Policy - Corporate commitment by the accountable manager
- 1.2. Management personnel
- 1.3. Duties and responsibilities of management personnel, instructors, knowledge examiners and practical assessors
- 1.4. Management personnel organisation chart
- 1.5. List of instructional staff, and examination staff and practical assessors *
- ~~Note: A separate document may be referenced~~
- 1.6. List of approved locations addresses *
- 1.7. List of subcontractors as per 147.A.145(d) *
- 1.8. General description of facilities at paragraph 1.6 locations addresses, including description of instructional equipment, tools and access to aircraft *
- 1.9. list of training courses and examinations approved by the competent authority
- 1.10. Notification procedures regarding changes to organisation, including, if applicable, procedure for the management of changes not requiring prior approval
- 1.11. Exposition and associated manuals amendment procedure
- 1.12. Alternative means of compliance procedure

* Note: A separate document may be referenced

PART 2 – TRAINING AND EXAMINATION PROCEDURES

- 2.1. Organisation of training courses
- 2.2. Preparation of training course material
- 2.3. Preparation of classrooms and equipment

- 2.4. Preparation of workshops/maintenance facilities and equipment
- 2.5. Conduct of theoretical training & and practical training (during basic knowledge training and type/task training)
- 2.6. Records of training carried out
- 2.7. Storage of training records
- 2.8. Training at locations not listed in paragraph 1.6
- 2.9. Organisation of examinations
- 2.10. ~~Security~~ Integrity and preparation of examination material
- 2.11. Preparation of examination rooms
- 2.12. Conduct of examinations (basic knowledge examinations, type/task training examinations and type examinations)
- 2.13. Conduct of practical assessments (during basic knowledge training and type/task training)
- 2.14. Marking and record of examinations
- 2.15. Storage of examination records
- 2.16. Examinations at locations not listed in paragraph 1.6
- 2.17. Preparation, control & and issue of basic training course certificates
- 2.18. Control of subcontractors

PART 3 – ~~TRAINING SYSTEM QUALITY~~ MANAGEMENT SYSTEM PROCEDURES

- 3.1. Audit of training
- 3.2. Audit of examinations
- 3.3. Analysis of examination results
- 3.4. Audit findings and analysis remedial corrective action procedure
- 3.5. ~~Accountable manager annual review~~ Annual review of the safety performance and the effectiveness of the management system
- 3.6. Qualifying the instructors, including authorisation procedure
- 3.7. Qualifying the examiners and the assessors, including authorisation procedure
- 3.8. Records of qualified instructors and & examiners
- 3.9. Hazard identification and safety risk management schemes
- 3.10. Safety action planning
- 3.11. Management of change (including organisational changes with regard to safety responsibilities)
- 3.12. Training and communication on safety
- 3.13. Management system record keeping
- 3.14. Concession control for deviations from organisation's procedures

PART 4 – APPENDICES

- 4.1. Example of documents and forms used

- 4.2. Syllabus of each training course
- 4.3. Cross-reference index - if applicable
- 4.4 List of aircraft types and STDs used for type training, including their location – if applicable

PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22

Name of organisation:

- | | |
|---|------------------------------------|
| <input type="checkbox"/> Initial approval | requested on..../ref |
| <input type="checkbox"/> Supplementary audit | ref |
| <input type="checkbox"/> Programme validation inspection | ref |
| <input type="checkbox"/> Change | requested on..../ref |
| <input type="checkbox"/> Continued validity | approval last confirmed.... |

Approval reference:

Requested scope of approval rating / change to the scope of approval*

EASA Form 11 dated*:

Other approvals certificates held (if applicable)

Address of facility audited:

Audit period: from to :

~~Date(s) of audit(s):~~

~~Audit reference(s):~~

~~Persons interviewed:~~

Competent authority surveyor: _____ Signature(s): _____

Competent authority office: _____ Date of EASA Form 22 Part 1 completion: _____

*delete where applicable

PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22**Part 2: Part-147 Compliance Audit Review**

The five columns may be labeled and used as necessary to record the approved training/examinations, facility, including subcontractors, reviewed. Against each column used of the following Part-147 subparagraphs, please either tick (✓) the box if satisfied with compliance, or cross (X) the box if not satisfied with compliance, and specify the reference of the Part 4 finding next to the box or enter N/A where an item is not applicable, or N/R when applicable but not reviewed.

Para	Subject					
147.A.100	Facility requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.105	Personnel requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.110	Records of instructors, examiners and assessors	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.115	Instructional equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.120	Maintenance training material	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.125	Records of training, examination, and assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.130	Training procedures and quality Management system	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.131	Training, examination and assessment procedures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

147.A.132	Management system record keeping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.133	Contracted activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.135	Examinations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.145	Privileges of the maintenance training organisation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part-66 Appendix I	Compliance of courses with Part-66 Appendix I	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part-66 Appendix II	Compliance of examinations with Part-66 Appendix II	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part-66 Appendix III	Compliance of courses with Part-66 Appendix III	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.148	Means of compliance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.150	Changes to the maintenance training organisation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.157	Access	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.160	Findings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.170	Immediate reaction to a safety problem	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

147.A.200 Approved basic training course

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147.A.205 Basic knowledge examinations

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147.A.210 Basic practical assessment

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147.A.300 Aircraft type/task training

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147.A.305 Aircraft type examinations and task assessments

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Competent authority ~~surveyor~~ inspectors(s):

Signature(s):

Competent authority office:

Date of EASA Form 22 Part 2 completion:

PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22**PART 3: Compliance with Part-147 maintenance training organisation exposition (MTOE)**

Please either tick (✓) the box if satisfied that the exposition paragraph complies with Part-147 and Part-66 and that the organisation complies with the exposition, or, if not satisfied with compliance, specify the reference of the Part 4 finding, or enter N/A where an item is not applicable, or N/R when applicable but not reviewed.

Part 1	MANAGEMENT GENERAL	
1.1	<input type="checkbox"/>	Safety Policy - Corporate commitment by the accountable Manager
1.2	<input type="checkbox"/>	Management personnel
1.3	<input type="checkbox"/>	Duties and responsibilities of management personnel, instructors, knowledge examiners and practical assessors
1.4	<input type="checkbox"/>	Management personnel organisation chart
1.5	<input type="checkbox"/>	List of instructional staff, and examination staff and practical assessors
1.6	<input type="checkbox"/>	List of approved locations addresses
1.7	<input type="checkbox"/>	List of subcontractors as per 147.A.145(d)
1.8	<input type="checkbox"/>	General description of facilities of paragraph 1.6 locations addresses, including description of instructional equipment, tools and access to aircraft
1.9	<input type="checkbox"/>	Specific List of training courses and type examinations approved by the competent authority
1.10	<input type="checkbox"/>	Notification procedures regarding changes to organisation, including, if applicable, procedure for the management of changes not requiring prior approval
1.11	<input type="checkbox"/>	Exposition and associated manuals amendment procedures,
1.12	<input type="checkbox"/>	Alternative means of compliance procedure

Part 2	TRAINING AND EXAMINATION PROCEDURES	
2.1	<input type="checkbox"/>	Organisation of training courses
2.2	<input type="checkbox"/>	Preparation of training course material
2.3	<input type="checkbox"/>	Preparation of classrooms and equipment
2.4	<input type="checkbox"/>	Preparation of workshops/maintenance facilities and equipment

2.5		Conduct of theoretical training & practical training (during basic knowledge training and type/task training)
2.6		Records of training carried out
2.7		Storage of training records
2.8		Training at locations not listed in paragraph 1.6
2.9		Organisation of examinations
2.10		Security Integrity and preparation of examination material
2.11		Preparation of examination rooms
2.12		Conduct of examinations (basic knowledge examinations, type/task training examinations and type examinations)
2.13		Conduct of practical assessments (during basic knowledge training and type/task training)
2.14		Marking and record of examinations
2.15		Storage of examination records
2.16		Examinations at locations not listed in paragraph 1.6
2.17		Preparation, control & and issue of basic training course certificates.
2.18		Control of subcontractors.

Part 3 **~~TRAINING SYSTEM QUALITY~~ MANAGEMENT SYSTEM PROCEDURES**

3.1		Audit of training
3.2		Audit of examinations
3.3		Analysis of examination results.
3.4		Audit findings and analysis remedial corrective action procedure
3.5		Accountable manager Annual review of the safety performance and the effectiveness of the management system
3.6		Qualifying the instructors, including authorisation procedure
3.7		Qualifying the examiners and the assessors, including authorisation procedure
3.8		Records of qualified instructors and & examiners.
3.9		Hazard identification and safety risk management schemes
3.10		Safety action planning
3.11		Management of change (including organisational changes with regard to safety responsibilities)
3.12		Trainig and communication of safety
3.13		Management system record keeping
3.14		Concession control for deviations from organisation's procedures

Part 4

APPENDICES

4.1		Example of documents and forms used
4.2		Syllabus of each training course
4.3		Cross reference index - if applicable
4.4		List of aircraft types and STDs used for type training, including their location – if applicable

MTOE reference:

MTOE amendment:

Competent authority audit staff:

Signature(s):

Competent authority office:

Date of EASA Form 22 Part 3 completion:

PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22**Part 4: Findings regarding Part-147 compliance status**

Each level 1 and 2 finding should be recorded whether it has been ~~rectified~~ corrected or not, and should be identified by a simple cross reference to the Part 2 requirement. All non-corrected ~~rectified~~ findings should be copied in writing to the organisation for the necessary corrective action.

Part 2 or 3 reference	Audit reference(s) identification: Findings	L E V E L	Corrective action		
			Date Due	Date Closed	
					Reference

PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22**Part 5: ~~Part-147 approval or continued approval or change recommendation~~
recommendation for initial certification or change approval or continued validity**

Note: complete information in Part 5A, B, C or D as applicable.

Name of organisation:

Approval reference:

Part 5A: Recommendation for initial approval:~~Audit reference(s) (or identification):-~~

Reference to audits/inspections/observations performed:

Persons interviewed:

Applicable Part-147 amendment status at the time of the recommendation:

The following Part-147 scope of approval is recommended for this organisation:

Competent authority inspector:

Signature:

Competent authority office:

Date of EASA Form 22 Part 5A completion:

Part 5B: Supplementary audit of training courses and/or examination (within six months from the initial approval) or regular audit of training courses and/or examination in accordance with 147.B.305(b)(3) or programme validation inspection in accordance with AMC 1 147.A.305(d)*

Reference to audits/inspections/observations performed:

Persons interviewed:

Applicable Part-147 amendment status at the time of the recommendation:

The (initial) Part-147 approval is confirmed for this organisation./ The (initial) Part-147 approval is changed as follows: *

The oversight planning cycle is confirmed: / The oversight planning cycle is changed as follows:*

EASA Form 11 dated*:

Name of recommending competent authority inspector:

Signature of recommending competent authority inspector:

Competent authority office:

Date of EASA Form 22 Part 5B completion:

Part 5C: Recommendation for a change to the approval:

Reference to audits/inspections/observations performed:

Applicable Part-147 amendment status at the time of the recommendation:

The following change to the Part-147 approval is recommended for this organisation:

EASA Form 11 dated*:

Name of recommending competent authority inspector:

Signature of recommending competent authority inspector:

Competent authority office:

Date of EASA Form 22 Part 5C completion:

Part 5D: Recommendation for the continued validity of the approval:

Oversight planning cycle : 24 months / 36 months / 48 months *

Reference to audits/inspections/observations performed within the last oversight planning cycle /
Reference to the oversight programme covering the complete scope of approval: *

Applicable Part-147 amendment status at the time of the recommendation:

The following Part-147 ~~scope of approval is confirmed recommended~~ for this organisation/ The following change(s) to the Part-147 ~~scope of approval is (are) recommended~~ for this organisation/ The Part-147 scope of approval is recommended to be limited/suspended for this organisation as follows*:

Note: This recommendation is subject to the completion of a full oversight planning cycle, including audits, inspections, observations as appropriate, in accordance with 147.B.305.

EASA Form 11 dated*:

Or, it is recommended that the Part 147 scope of approval specified in EASA Form 11 referenced be continued

~~Name of recommending competent authority surveyor :~~

~~Signature of recommending competent authority surveyor :~~

~~Competent authority office:~~

~~Date of recommendation:~~

Name of recommending competent authority inspector:

Signature of recommending competent authority inspector:

Competent authority office:

Date of EASA Form 22 Part 5D completion:

Audit report review

Form 22 review (quality check) :

Quality check performed by :

Name:

Position:

Signature:

Date:

APPENDIX IV

EASA Form 12

EASA FORM 12 Page 1	APPLICATION FOR PART-147 INITIAL / CHANGE OF APPROVAL
<p>Registered Name & Address of Applicant:</p> <p>Trading Name (if different):</p> <p>Addresses Locations Requiring Approval:</p> <p>Tel No:.....</p> <p>Fax No.....</p> <p>E Mail.....</p>	
<p>Scope of Part-147 Approval Relevant to This Initial */ Change of * Application (See other side for training course designators to be used):</p> <p>Basic Training:</p> <p>Type Training:</p> <p>Does the organisation hold certificates approval under EASA Part-21 * /Part-145 * / Part-M *</p> <p>* Cross out whichever is not applicable</p>	
<p>Name & Position of the Accountable Manager:</p> <p>Signature of the Accountable Manager:</p> <p>Date of Application:</p> <p>Please send this form with any required fee to be paid under National Legislation to your National Aviation Competent Authority</p>	<p>Space for official use</p>

4. Regulatory Impact Assessment (RIA)

4.1. Issue which the NPA is intended to address and sectors concerned

The current rules for airworthiness foresee different types of organisation approvals with different systems for managing safety/quality issues. Despite the fact that these systems have been able to achieve relatively good safety results, the Agency already identified (cf. COrA report as the outcome of rulemaking task MDM.004 'Consistency of Organisation Approvals'¹³) that the existence of multiple safety/quality management system frameworks with differing, duplicated or inconsistent requirements can have not just negative economic but possibly adverse safety impacts caused by confusions, in particular if implemented within a single organisation. Such organisations have been identified to have a greater potential for making errors which can affect safety.

It was also concluded that the additional resources necessary to be deployed by both the organisations and the competent authorities performing their oversight to control the various differences, duplications and inconsistencies should rather be used to address safety issues.

The potential for hazards, failures and operational errors is an inherent feature of complex, dynamic socio-technical systems such as aviation. The expected benefit from the uniform implementation of a single management system framework for effective safety management in all aviation organisations required to hold an organisation certificate within the remit of the Basic Regulation reside in the development within those organisations of capabilities to identify aviation safety hazards, to assess the associated risks and to effectively mitigate their consequences. If safety management is not implemented, this potential will not be developed at the level of individual organisations and the combined effects of this gap may have a significant safety impact on the entire aviation system.

When determining the proposed applicability of the new management system framework encompassing safety management in the area of continuing airworthiness, consistency needs to be ensured with the applicability of the new framework as set out in Commission Regulation (EU) No 290/2012:

Commission Regulation (EU) No 290/2012 requires the following organisations to implement the new management system requirements:

- (a) Approved Training Organisations (ATOs) for pilot training, including those only providing training for non-professional licences (Private Pilot Licence, Balloon Pilot Licence, Sailplane Pilot Licence);
- (b) Holders of a Flight Simulation Training Device (FSTD) qualification certificate; and
- (c) Aero-medical centres.

In line with the above, it is proposed that all Part-147 organisations, regardless of their size, nature, and complexity, be required to implement the new management system framework. To ensure proportionality, the 'Management system' AMCs proposed to be included for Part-147 reflect the AMCs included for those organisations within the scope of Commission Regulation (EU) No 290/2012 that qualify as 'non-complex'.

¹³ [http://www.easa.europa.eu/rulemaking/docs/npa/2006/final%20A-NPA%2015-2006%20COrA%20\(26.09.06\).pdf](http://www.easa.europa.eu/rulemaking/docs/npa/2006/final%20A-NPA%2015-2006%20COrA%20(26.09.06).pdf)

The implementation of the new management system provisions with regards to safety management will have a positive impact on the organisation's ability to effectively convey the importance of a positive safety culture through its training and assessment activities, as the organisation will gain experience through the implementation of safety management principles within its own organisation.

What are the risks (probability and severity)?

In the past decades, accidents and occurrences were to a large extent the result of some common causes. Common cause hazards are the ones that are most effectively addressed through prescriptive requirements. Although it cannot be assumed that all common cause hazards have been or even can be ultimately addressed, it is widely accepted that fewer accidents will be related to broadly distributed exposure factors. Moreover, with increasing complexities, human and organisational factors will play a more predominant role in accident and incident causation. Hence, accidents and incidents will typically become more 'random' in terms of causation, with causes becoming more specific and unique to given operators, aircraft, events, regions, etc. To address these random causes, a proactive approach is required that will rely on organisations' capability to effectively manage risks at all levels of the aviation system, whether these risks stem from common cause hazards or random causes.

If safety management is not implemented within the scope of Commission Regulation (EC) No 2042/2003, the potential for effective safety management will not be developed in the area of continuing airworthiness management, maintenance and maintenance training organisations. This is expected to adversely impact the safety level of the entire aviation system. This assumption is supported by the recurrence of maintenance errors in high-risk events, as shown in a number of safety recommendations issued following serious incidents and accidents where maintenance has been identified as direct contributing factor. Similarly, in a number of accidents and serious incidents, human error, coordination, and performance issues have contributed to adverse events and maintenance errors within the contracted maintenance organisation.

Considering the need for effective safety management at all levels of the aviation system, including for those activities that relate to promoting safety management principles during initial and type training, the need to more effectively mitigate risks inherent to human performance limitations and those stemming from inadequate training, examination standards and competence assessment, (e.g. in relation to the training needs analysis), the following risk classification is proposed :

Probability of occurrence		Severity of occurrence				
		Negligible	Minor	Major	Hazardous	Catastrophic
		1	2	3	5	8
Extremely improbable	1					
Improbable	2					
Remote	3		6			
Occasional	4					
Frequent	5					

4.2. Objectives

The principal objective is to adapt Commission Regulation (EC) No 2042/2003 and corresponding AMC/GM for implementation of organisation management system and authority requirements addressing the relevant ICAO SARPs on safety management (Annex 19) in the field of continuing airworthiness, thus facilitating international harmonisation.

Additional objectives are to:

- (a) improve overall consistency and harmonise organisation management system requirements applicable to the different types of organisations;
- (b) streamline certification and oversight processes, as far as practicable; and
- (c) improve resilience of implementing rules by focusing on the safety objective and leaving specific methods and implementation means to the AMC level.

The intended effects would mainly be to:

- (a) enhance safety by:
 - (i) contributing to hazard identification and risk management;
 - (ii) improving transparency; and
 - (iii) promoting SMS principles as part of maintenance training.
- (b) improve efficiency in certification and oversight processes.

4.3. Policy options

Table 1: Selected policy options

Option No	Short title	Description
0		Baseline option (no change in rules)
1		Amend Part-66 and Part-147 as outlined in 2.4

4.4. Methodology and data

4.4.1. Applied methodology

The working method adopted for this Regulatory Impact Assessment (RIA) is to perform a qualitative assessment of possible impacts. This choice considers the following:

- (a) No up-to-date data sets are available to the Agency regarding the typical size, and main activity of approved organisations in the remit of Commission Regulation (EC) No 2042/2003.
- (b) SMS is becoming an international standard and failing to implement it will be detrimental to the objective of continuous improvement of the overall level of safety, as a significant segment of the Air Transportation System would not implement safety management principles.
- (c) The Agency already committed to the implementation of SMS and SSP related requirements in the area of airworthiness, both initial and continuing, as part of the EASp (ref. SYS. 1.3 and 2.2).
- (d) Part-147 organisations also holding other approval certificates within the scope of the Basic Regulation will be or are already required to upgrade their management system to the new requirements encompassing safety management:
 - (1) Approved Training Organisations through Commission Regulation (EU) No 290/2012, applicable since of 09 April 2013.
 - (2) AOC holders through Commission Regulation (EU) No 965/2012, applicable as of 28 October 2014;
 - (3) Part-M Subpart G and Part-145 organisations based on rulemaking task MDM.055 - NPA 2013-01, for which an amending Regulation may be expected in 2015; and
 - (4) Design and Production organisations based on rulemaking task MDM.060 for which an amending regulation may be expected in 2016.

Competent authorities are already required to 'upgrade' their systems and procedures to adapt these to the new authority requirements introduced with Commission Regulation (EU) No 290/2012 and Commission Regulation (EU) No 965/2012.

4.4.2. Data collection

Not applicable

4.5. Analysis of impacts

4.5.1. Safety impact

The proposed rule changes intend to further improve the overall level of safety by developing safety and risk management capabilities of organisations and authorities covering the full spectrum of organisations within the remit of Commission Regulation (EC) No 2042/2003.

Typical maintenance training related hazards that may contribute to lowering the level of aviation safety are:

- inadequate training activities in terms of depth and length of training, competence and qualification of instructors, etc.;
- complacency, errors or omissions in the training needs analysis;
- 'flawed' competence assessments for the validation of knowledge and skills, in particular during practical training when performed on real aircraft (which is now an integral part of type training under the responsibility of Part-147 organisations);
- a lack of integrity in examinations; and
- maintenance errors during practical training / assessment of practical skills that have not been detected/corrected.

Also, it may be expected that 'commercial pressure' on Part-147 organisations will increase in the near future due to amplified competition and an expected shortage in aviation professionals. Therefore, the corresponding risks must be mitigated both through reactive and proactive strategies to apply highest standards for training needs analysis, training, competence assessment and examination.

The results of inadequate maintenance training, assessment and examination standards may go undetected for a very long time, but these may lead to or contribute significantly to serious or fatal events. According to some sources¹⁴ only a small percentage of all human errors are assumed to be 'knowledge-based errors', but as only a small percentage of these errors can be detected and corrected, the real percentage may be much higher.

In most cases a Part-66 licence holder will be subject to the authorisation, competence assessment and training procedures of the approved training organisation that employs or contracts them. However, this 'filter' may not always work effectively and it does not apply when maintenance is performed by independent Part-66 licenced certifying staff.

Additional safety benefits may be expected for all training activities in relation to Human Factors and SMS: Part-147 organisations applying safety management principles within their own organisation will foster an organisational culture that will increase their capability to teach Human Factors and SMS related subjects.

For organisations holding more than one certificate within the scope of the Basic Regulation, the provisions have been defined and structured in a way that allows combination or full integration of the different management systems as the same management system framework will apply. Truly integrated management should not be thought of as just merging management system documentation. A holistic approach to management is of particular interest in relation to safety risk management, as it aims to reduce or eliminate trade-offs that will exist between different organisational goals.

Streamlined authority requirements, including the new management system requirements and the new oversight provisions, will enhance the potential of competent authorities to focus their actions on areas presenting a higher risk. Moreover, the additional authority requirements for the exchange of safety information will effectively support the implementation of SSP/EASP.

The safety benefits of the proposed rule changes will not be 'measurable' immediately. It is widely recognised that the implementation of effective safety management processes needs a series of changes to occur within an organisation or an authority that require some time to become effective. This is particularly relevant in relation to the efforts required to

¹⁴ E.g. 'Human Error', James Reason, Cambridge University Press, 1990

foster a positive safety culture within an organisation, and this cannot be 'engineered' through regulations.

4.5.2. Environmental impact

None identified

4.5.3. Social impact

No negative social impacts are expected.

4.5.4. Economic impact

Industry

Organisations approved within the remit of Commission Regulation (EC) No 2042/2003 will be required to adapt their management system to comply with the new requirements, and to follow the corresponding AMCs or approved alternative means of compliance. For larger organisations, it can be expected that a certain percentage have already implemented SMS following the ICAO framework, on a voluntary basis, under contractual obligations imposed on them by their customers, or because they also hold an approval certificate for which the new management system requirements are already applicable.

In this context, it is important to stress that the EASA management system framework has been designed in a way as to leverage the existing quality system. Also, it provides significantly more flexibility than the ICAO SMS framework, by including all detailed means to comply at AMC level. On the other hand, organisations that have implemented their SMS based on the ICAO framework should be able to adapt to the new provisions without unnecessary burden, as they should already have in place a system that includes the main elements of the new EASA management system framework.

At the level of approved organisations, the additional processes and organisational changes to be implemented are summarised below, highlighting, where relevant, specific alleviations:

- (a) Designation of a safety manager or person fulfilling the role of safety manager;

Note 1. It is possible that the same person acts as safety manager and compliance monitoring manager.

Note 2. The accountable manager or one of the nominated post-holders may fulfil the role of safety manager.

- (b) Hazard identification, safety risk management, incident investigation, and internal safety reporting;
- (c) Safety action planning;
- (d) Safety performance monitoring;
- (e) Emergency response planning and/or coordination;
- (f) A process for the management of change;
- (g) Safety training and promotion; and
- (h) Management system record keeping.

Note 3. None of the processes listed in points (b) to (h) require the implementation of overly complex tools or methodologies.

The above described changes create implementation costs that are proportionally higher for smaller organisations. It must be noted that the extent of hazard identification and risk management activities required in a Part-147 organisation is generally more limited than for a maintenance organisation or an AOC holder, because of the specific nature of aviation safety risks entailed by maintenance training, assessment and examination activities, being less tightly coupled with flight operations.

To compensate for some of these implementation costs, the existing provisions related to the quality system/internal audit have been reviewed:

- A new provision is proposed at AMC level to allow the organisation to extend the planning cycle for its internal audits by up to 100% (cf. AMC1 147.A.130(a)(6) 'Management system' point (d), this would require the absence of any safety critical findings identified by the competent authority).
- The provision in existing AMC 147.A.130(b) stating that contracting of the audit function is 'conditional on the audit being carried out twice in every 12-month period with one such audit being unannounced' is proposed to be deleted, as it is not in line with performance-based audit programming principles.

This shall provide an incentive for the organisation to implement the new, proactive processes for managing safety, while processes to ensure compliance with the applicable requirements remain an important element within the new management system.

Moreover, these implementation costs can be reduced in specific cases through the use by the organisation of alternative means of compliance for any of the management system elements contained at AMC level, if it can demonstrate that an equivalent level of safety can be met. This flexibility provided is also intended to encourage the development of novel, more efficient solutions in the area of safety management processes. The implementation costs can further be reduced by encouraging the implementation of common tools and data sharing agreements for the management of safety at the level of industry associations, for example in the context of the European Strategic Safety Initiative (ESSI).

Once organisations have demonstrated effective implementation of the new management system framework, they should see a reduction in the amount of and costs associated with competent authority oversight. Conversely, organisations which have not been able to implement robust safety management processes will be penalised as the oversight burden may increase.

Finally, effective implementation will benefit not only safety, but it is also expected to benefit productivity and efficiency, through the adoption of better management strategies and new risk management capabilities not only for aviation safety risks, but also in relation to business risks. The management system framework provides an organisational structure which supports managers to take informed decisions. Without such a framework to manage operational risk, trade-offs between commercial pressures and safety objectives may not be managed effectively and decisions not be justified objectively. Effective management system implementation will, therefore, contribute to a decrease in insurance costs, improved reputation, and commercial success.

Authorities

The new management system requirements in Section B define a range of new processes and tasks for competent authorities, in particular:

- (a) the transmission to the Agency of procedures and amendments thereto, the

- information to be provided to the Agency regarding changes affecting the management system;
- (b) the information to be provided to the Agency and other Member States regarding alternative means of compliance approved or used by the competent authority;
 - (c) keeping records of the evaluation of alternative means of compliance proposed by persons and organisations and the assessment of alternative means of compliance used by the competent authority itself;
 - (d) the definition and implementation of procedures for participation in a mutual exchange of information and assistance to other competent authorities;
 - (e) the implementation of a compliance monitoring function, including an internal audit process and safety risk management process;
 - (f) the implementation of processes to initially and continuously assess qualified entities performing certification or oversight tasks on behalf of the competent authority;
 - (g) maintaining a list of all organisation certificates issued;
 - (h) the implementation of a system to plan the availability of personnel;
 - (i) the development and implementation of methodologies to assess the safety performance of organisations; and
 - (j) the implementation of a system for continuous monitoring of safety performance, considering compliance and risk management capability of organisations.

Whereas for most of these tasks authorities should be able to rely on existing resources and communication channels, it is acknowledged that implementing some of them will require a reallocation of resources. The responsibilities of Member States for providing the necessary oversight capabilities and resources to competent authorities to perform their tasks in accordance with the applicable requirements have been emphasised through the inclusion of the new Article 7 'Oversight capabilities' in the Cover Regulation. This supports the implementation of SSP/EASp.

As the new authority requirements and related provisions are fully aligned with those already in place under the new EU Regulations in the area of civil aviation air crew and air operations, competent authorities should have already initiated the implementation of the required changes and the adaptation of their systems and procedures, which implies that they would then need to extend the scope of these existing systems and procedures to cover the activities within the scope of Commission Regulation (EC) No 2042/2003¹⁵.

In the medium term, streamlined requirements for oversight, certification and enforcement, as well as a consolidation of competent authorities' management systems, including compliance monitoring and safety risk management, are expected to increase efficiency in certification and oversight processes in terms of both safety and costs.

Finally, all of the new processes and tasks arising for competent authorities are intended to support the achievement of the principal objective of the Basic Regulation in terms of safety, standardisation and harmonisation, considering the ICAO SARPs related to States' safety management responsibilities under their SSP. The transition measures proposed with the draft Cover Regulation consider the need for authorities to adapt to the new requirements.

¹⁵ The opt-outs defined for Regulations (EU) 290/2012 and 965/2012 will run until 08 April 2013 and 28 October 2014 respectively, which implies the relevant authority requirements should be fully implemented before the amending Regulation produced with rulemaking task MDM.055 is expected to enter into force

4.5.5. General aviation and proportionality issues

Effective management systems will benefit all types of organisations by supporting managers to take informed decisions, and more effectively allocate their limited resources against risks. In order to limit the impact of the new provisions on Part-147 organisations, these have been considered as 'non-complex' for the determination of the applicable AMCs in relation to the new management system framework.

In this regard, the efforts that will be required from Part-147 organisations in relation to the implementation of the new safety management related provisions is not any different from that already required from Aero-medical centres and holders of a Flight Simulation Training Device (FSTD) certificate under Commission Regulation (EU) No 290/2012. Therefore, this NPA is not expected to create any undue burden for General Aviation.

4.5.6. Impact on 'Better Regulation' and harmonisation

The current rules for continuing airworthiness include different types of organisation approvals with different systems for managing safety/quality issues. Despite the fact that these systems have been able to achieve relatively good safety results, the Agency already identified (cf. COra report as the outcome of rulemaking task MDM.004 'Consistency of Organisation Approvals') that the existence of multiple safety/quality management system frameworks with differing, duplicated, or inconsistent requirements can have not just negative economic, but possibly adverse safety impacts caused by confusions, in particular if implemented within a single organisation. Such organisations have been identified to have a greater potential for making errors which can affect safety.

In line with the total system approach the applicability of the EASA management system framework extends beyond that of the SMS framework as set out in the first edition of ICAO Annex 19. The 'components' of the aviation system (activities and categories of service providers) are part of a single network. Aviation safety is an emergent property of this closely coupled system of systems, with many interdependencies between individuals, organisations and technology. Therefore, at some stage all providers of aviation services or products that are the target of aviation safety regulations should implement the same basic safety management processes. This would not only ensure interoperability between individual SMS, thereby reducing the risk of safety gaps, overlaps, confused responsibilities and inefficient use of resources as related to hazard identification and risk management, but it would also be the most effective way to detect hazards and control their consequences at all levels of the aviation system and at the earliest possible stage. It would also ensure that all actors 'speak the same language' when it comes to safety and safety management, thus supporting effective implementation.

To pursue the objectives of international harmonisation in the area of SMS as fostered by ICAO through Annex 19, the Agency actively participates in the Safety Management International Collaboration Group. SM ICG was founded by the United States Federal Aviation Administration, the European Aviation Safety Agency and Transport Canada Civil Aviation and is a joint cooperation between many regulatory authorities for the purpose of promoting a common understanding of safety management principles and requirements and facilitating their implementation across the international aviation community.

EASA Part-147 and Part-66 are currently not addressed in any of the existing bilateral aviation safety agreements.

4.6. Comparison and conclusion

4.6.1. Comparison of options

Based on the above considerations, the need for an amendment to Commission Regulation (EC) No 2042/2003, covering Annexes I to IV, is supported on the grounds of overall consistency, safety and increased efficiency.

4.6.2. Monitoring and ex post evaluation

The need for monitoring and ex post evaluation of the implementation of the new management system provisions for organisations and new authority requirements will be determined based on the results of the NPA/CRD consultation.

5. References

5.1. Affected regulations

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.

5.2. Affected CS, AMC and GM

Decision 2003/19/RM of the Executive Director of the European Aviation Safety Agency of 28 November 2003 on Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Commission Regulation (EC) No 2042/2003 of 20 November 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.

5.3. Reference documents

NPA 2013-01 'Embodiment of Safety Management System (SMS) requirements into Commission Regulation (EC) No 2042/2003 (Part-M and Part-145)'.

6. Appendices

Detailed list of changes

6.1. PART-66 DETAILED DESCRIPTION OF CHANGES

NOTES:

- Items identified with a (*) are fully aligned with the equivalent changes proposed to Part-M, Part-145, and Part-147.
- Editorial and consistency changes described in paragraph 2.4.15 of the Explanatory Note are not further described in this list.

Reference	Type of change	Description
SUBPART A	Subpart renamed	The heading has been changed to: SUBPART A – GENERAL AND MANAGEMENT SYSTEM
66.B.10 Competent authority	deleted	This IR has been deleted as the issues are now addressed in the Cover Regulation (cf. new Article 7 'Oversight Capabilities') and in new IRs related to competent authority management system.
66.B.10 Management system*	new	A new IR has been added to align with ARX.GEN.200.
AMC1 66.B.10 Management system*	new	A new AMC has been added to align with AMCs to ARX.GEN.200 and with corresponding changes in Part-M, Part-145, and Part-147.
GM1 66.B.10 Management system*	new	A new GM has been added to align with GM1 ARX.GEN.200(a).
AMC1 66.B.10 (a)(1) Management system*	new	This new AMC on documented policies and procedures has been added to transpose AMC1 ARX.GEN.200(a)(1).
GM1 66.B.10 (a)(2) Management system*	new	This new GM has been added to transpose GM1 ARA.GEN.200(a)(2) on sufficient personnel.
AMC1 66.B.10 (a)(3) Management system*	new	This new AMC on training general has been added to transpose AMC2 ARX.GEN.200(a)(2).
AMC2 66.B.10 (a)(3) Management	new	A new AMC has been added to transpose ARX (cf. AMC2 ARX.GEN.200(a)(2)) on

Reference	Type of change	Description
system*		qualification and training for competent authority inspectors.
AMC3 66.B.10 (a)(3) Management system*	new	This new AMC on initial and recurrent training of inspectors has been added to transpose ARX.
AMC4 66.B.10 (a)(3) Management system*	new	This new AMC on competence assessment has been added in response to recurrent standardisation findings.
AMC1 66.B.10 (d) Management system*	new	This new AMC specifying the procedures to be made available to the Agency for the purpose of standardisation has been added to transpose ARX (cf. AMC1 ARX.GEN.200(d)).
66.B.12 Allocation of tasks to qualified entities*	new	This new provision has been added to align with ARX.GEN.205.
GM1 66.B.12 Allocation of tasks to qualified entities*	new	A new GM has been added to align with Part-ARX. It clarifies which tasks can be allocated to a qualified entity.
66.B.14 Changes in the management system*	new	A new IR has been added to align with ARX.GEN.210.
66.B.20 Record keeping	deleted, replaced with new text	This IR has been deleted and replaced with new text (see below).
66.B.20 Record keeping	new	A new IR has been added which covers all elements of former 66.B.20 'Record keeping'. It is aligned with ARX.GEN.220 and with corresponding changes in Part-M, Part-145, and Part-147.
AMC 66.B.20 Record keeping	deleted, replaced with new text	This AMC is deleted and its text incorporated in the new AMC1 66.B.20(a).
AMC1 66.B.20 (a) Record keeping*	new	This new provision has been added to align with ARX.GEN.220 and with corresponding changes in Part-M, Part-145, and Part-147. All the elements previously included with AMC 66.B.20 have been incorporated.

Reference	Type of change	Description
AMC1 66.B.20 (a)(1) Record keeping*	new	This new provision on records related to the competent authority's management system has been added to align with ARX.GEN.220 and with corresponding changes in Part-M, Part-145, and Part-147.
AMC1 66.B.20(a)(5) Record-keeping	new	This new AMC has been added to align with Part-ARA (cf. AMC1 ARA.GEN.220 (a)(5)). It lists records to be kept in relation to licence holders.
GM1 66.B.20 Record keeping*	new	A new GM has been added to align with Part-ARX. It clarifies version control as applied to records.
66.B.25 Mutual exchange of information	amended	Point (a) has been deleted, as it duplicates Article 15 of Regulation (EC) No 216/2008.
66.B.30 Exemptions	deleted	This IR has been deleted, the issue is now addressed in new 66.B.20 'Record keeping' point (a)(7).
66.B.30 Information to the Agency*	new	This new IR has been included to align with ARX.GEN.125.
66.B.35 Oversight documentation*	new	A new IR has been added to align with ARX (cf. ARX.GEN.115). It complements the new Cover Regulation Article 7 'Oversight capabilities'.
Appendix I- Basic Knowledge Requirements MODULE 9A. HUMAN FACTORS	amended	This module has been amended for the required level in relation to items 9.1, 9.2, and 9.8. Item 9.9 'Hazards in the workplace' has been replaced by the new 9.9 'Safety Management', and its level has been upgraded.
Appendix I- Basic Knowledge Requirements MODULE 9B. HUMAN FACTORS	amended	Item 9.9 'Hazards in the workplace' has been replaced by the new 9.9 'Safety Management'.

6.2. PART-147 DETAILED DESCRIPTION OF CHANGES

NOTES:

- Items identified with a (*) are fully aligned with the equivalent changes proposed to Part-M and Part-145 as per NPA 2013-01(B) 'Part-M' and 2013-01(C) 'Part-145'.
- Editorial and consistency changes described in paragraph 2.4.15 of the Explanatory Note are not further described in this list.

Reference	Type of change	Description
AMC 147.1	deleted	This AMC has been deleted, the issue is now addressed in new Cover Regulation Article 7 'Oversight capabilities'.
147.A.15 Application for an organisation certificate*	title changed, amended	The title and text of this provision have been aligned with ORX.GEN.115 'application for an organisation certificate'.
AMC1 147.A.15 Application for an organisation certificate	title changed	The title of this AMC has been aligned with changes made to 147.A.15.
147.A.20 Terms of approval *	new	This new IR has been added to align with Part-ORX.
147.A.100 Facility requirements	amended	Paragraph (d) has been amended by deleting the provision that is applicable to the competent authority and replacing it by the statement to be included in the contract related to the right of access of the competent authority to contractors.
147.A.105 Personnel requirements	amended	The text has been reviewed for consistency with changes made throughout Part-147. Point (b)(2) has been deleted as the issue is now covered under new 147.A.130(a)(1) and existing 147.A.140(a)(2). A new point (c) is added to align with Part-145 in relation to the need to appoint a person with responsibility for the compliance monitoring function.
AMC1 147.A.105 (b);(c) Personnel requirements	amended	The text has been reviewed for consistency with changes made in 147.A.105. Point(c) has been deleted as the issue is now covered under new 147.A.130(c). The text of AMC 147.A.105(b) has been incorporated, and clarification added that the organisation may adopt different designations for such nominated person, as long as it documents correspondence with the relevant Part-147 designations (e.g. by means of a cross-reference table).

Reference	Type of change	Description
		Point (c) of the AMC as amended clarifies that an EASA Form 4 should also be provided for the person with responsibility for compliance monitoring. Point (g) introduces a new requirement for the assessment and authorisation of instructors, knowledge examiners and practical assessors.
AMC 147.A.105(b) Personnel requirements	deleted	The AMC has been incorporated into AMC1 147.A.105(b) as point (c) (see above).
AMC1 147.A.105(c) Personnel requirements	new	This new AMC has been added to define the knowledge and experience required for the compliance monitoring manager. It is based on AMCs to ORX.GEN.200(a)(6).
GM to 147.A.105(c) Personnel requirements	deleted	This GM is now included as AMC (see below).
AMC1 147.A.105(d) Personnel requirements	new	Former GM to 147.A.105(c) is now included as AMC, in line with legal drafting principles.
GM to 147.A.105(f) Personnel requirements	deleted	This GM is now included as AMC (see below).
AMC1 147.A.105(g) Personnel requirements	new	Former GM to 147.A.105(f) is now included as AMC. As training of potential instructors should be ensured in all cases, it is not enough to simply recommend such training.
GM to 147.A.105(g) Personnel requirements	deleted	This GM is now included as AMC (see below).
AMC2 147.A.105(g) Personnel requirements	new	Former GM to 147.A.105(g) is now included as AMC to strengthen the provision in an area that is critical in terms of ensuring highest examination standards are applied.
AMC1 147.A.105(i) Personnel requirements	amended	Former AMC 147.A.105(h) is now included as AMC1 147.A.105(i). It has been further amended to clarify the normal duration of recurrent training and by incorporating all elements from GM to 147.A.105(h).
GM to 147.A.105(h) Personnel requirements	deleted	This GM has been incorporated into AMC1 147.A.105(f) (see above).

Reference	Type of change	Description
GM1 147.A.105(b) Personnel requirements	new	A new GM has been added to clarify the meaning of 'senior person'.
GM1 147.A.105(d) Personnel requirements	new	A new GM has been added to clarify the meaning of 'permanent staff'.
147.A.110 Records of instructors, examiners and assessors	amended	In point (b), 'terms of reference' has been replaced by 'formal authorisation', which better reflects the intent and better aligns with terminology used in Part-145.
AMC1 147.A.110(a) Records of instructors, examiners and assessors	amended	Point 3 of the AMC has been amended in line with legal drafting principles without altering its intent. Point 4 of the AMC has been deleted to include it as GM (this point does not constitute means to comply for the organisation).
AMC1 147.A.110(b) Records of instructors, examiners and assessors	new	In line with legal drafting principles, the text of GM to 147.A.110 has been changed to AMC and the text changed to active speech. Additional elements have been included to define the contents of the authorisation for instructors, knowledge examiners, and practical assessors.
GM to 147.A.110 Records of instructors, examiners and assessors	deleted	This GM is now incorporated as AMC1 147.A.110(b).
GM1 147.A.110 Records of instructors, examiners and assessors	new	This new GM includes point (4) of existing AMC 147.A.110 related to the competent authority's right of access.
147.A.115 Instructional equipment	amended	Only editorial changes have been made for consistency.
AMC1 147.A.115(c);(d) Instructional equipment	new	This new AMC has been added to incorporate point (3) of existing AMC 147.A.115(c) (which is now included as GM), so as to make it applicable to points (c) and (d) of 147.A.115. It is important to stress that the Part-147 organisation remains in full control over any facilities it uses.

Reference	Type of change	Description
GM1 147.A.115(c) Instructional equipment	re-identified	In line with legal drafting principles, AMC 147.A.115(c) is now included as GM. Point (3) of the AMC has been deleted, and is now included as AMC1 147.A.115(c);(d) (see above).
147.A.125 Records of training, examination, and assessment	amended	The title has been changed by adding a reference to 'training, examinations, and assessment', to differentiate from management system records, being the subject of the new 147.A.132.
AMC1 147.A.125 Records of training, examination, and assessment	new	This new AMC is added to clarify format of and access to records. It includes the text of existing AMC1 147.A.110(a) points (b) and (c), and that of new AMC1 to 147.A.132. A new element is added to cover the case where the organisation ceases all activities under its Part-147 approval.
147.A.130 Training procedures and quality system	deleted	This has been replaced by the new 147.A.130 'Management system' and new 147.A.131 'Training, examination and assessment procedures'..
147.A.130 Management system *	new	This new implementing rule, replacing subparagraph (b) of 147.A.130 'Training procedures and quality system', has been added to align with the elements of ORX.GEN.200 'management system'. This incorporates the safety management elements and ensures consistency of organisation approvals for those organisations approved in accordance with more than one Part.
AMC1 147.A.130(a)(1);(2);(3);(5) Management System*	new	This new AMC transposes AMC1 ORX.GEN.200(a)(1);(2);(3);(5) with specific means to comply for non-complex organisations (all PART-147 should be considered 'non-complex' in terms of 'management system'.
GM1 147.A.130(a)(1) Management system	new	This new GM has been added to clarify responsibility versus accountability with regard to safety; it is based on material available on Skybrary: http://www.skybrary.aero/index.php/Safety_Accountabilities_and_Responsibilities
GM2 147.A.130 (a)(1) Management system*	new	This GM transposes Part-ORX GM related to the 'safety manager'.
GM1 147.A.130	new	This GM transposes Part-ORX GM related to the 'safety policy'.

Reference	Type of change	Description
(a)(2) Management system*		
AMC1 147.A.130 (a)(3) Management system	new	This new AMC defines the internal safety reporting scheme as an element of reactive and proactive hazard identification.
AMC2 147.A.130 (a)(3) Management system	new	This new AMC is based on point (5) of GM to 147.A.130(b) on the annual review of overall performance. It is included at AMC level to acknowledge the existence of a dedicated MTOE chapter (3.5).
GM1 147.A.130 (a)(3) Management system*	new	This new GM explains emergency response planning.
AMC1 147.A.130 (a)(4) Management system*	new	This AMC transposes Part-ORX AMC related to 'training and communication on safety'.
GM1 147.A.130 (a)(5) Management system*	new	This GM transposes Part-ORX GM related to the management system documentation. Flexibility is provided for the organisation to determine the best solution for documenting its management system and procedures so as to demonstrate that it complies with the applicable requirements. Organisations approved in accordance with more than one Part do not need to duplicate information in several manuals.
AMC 147.A.130(b) Training procedures and quality system	deleted	This AMC has been replaced by the new AMC1 147.A.130(a)(6). Point 4 is now addressed in new 147.A.133 'Contracted activities'.
GM to 147.A.130(b) Training procedures and quality system	deleted	This GM is superseded by the new AMCs and GM to 147.A.130(a)(6).
AMC1 147.A.130(a)(6) Management system *	new	This new AMC supersedes AMC 147.A.130(b) and provides details on the compliance monitoring function. To align with Part-145, a new provision has been added to allow extension of the audit planning cycle by up to 100%. The provision in existing AMC 147.A.130(b) related to contracting of the audit function (being conditional on the audit being carried out twice in every 12-month period with one such audit being unannounced) has not been maintained, as this is not in line with performance-based audit programming.

Reference	Type of change	Description
AMC2 147.A.130(a)(6) Management system *	new	This new AMC specifies how the deviations from the organisation's procedures should be controlled. It is aligned with that proposed for Part-145 (cf. NPA 2013-01(C)). *
GM1 147.A.130 (a)(6) Management system	new	This new GM provides further clarification on possible options for the performance of audits and inspections, with a view to ensuring independence and of the compliance monitoring function. It incorporates point 4 of existing GM to 147.A.130 (b) 'Training procedures and quality system' (now point (b)).
147.A.131 Training, examination and assessment procedures	new	This new Implementing Rule is added to include 147.A.130 subparagraph (a).
AMC1 147.A.131 Training, examination and assessment procedures	new	This new AMC, based on corresponding Part-145 AMC material, provides means of compliance for the new 147.A.131.
147.A.132 Management system record keeping*	new	This new provision is added to include management system record keeping requirements. These are additional to those already contained in 147.A.110 and 147.A.125.
AMC1 147.A.132 Management system record keeping*	new	A new AMC has been added to align with Part-ORX (cf. AMC1 ORX.GEN.220(b)). It provides the specifications for record keeping to ensure traceability and preservation.
GM1 147.A.132 Management system record keeping*	new	A new GM has been added to align with Part-ORX (cf. GM1 ORX.GEN.220). It addresses records stored on micro-film and optical storage.
147.A.133 Contracted activities	new	This new IR has been added to align with ORX.GEN.205. It includes points (d)(2) and (d)(3) of existing 147.A.145 'Privileges of the maintenance training organisation'. AMCs and GM related to the contracting control procedure that are currently under 147.A.145 'Privileges' have been relocated accordingly.
AMC1 147.A.133(b) Contracted activities	new	This new AMC incorporates point 4 of existing AMC 147.A.130(b), GM 147.A.145 (d) 'Privileges of the maintenance training organisation' and elements of AMC 147.A.145(d) in relation to subcontracting control.

Reference	Type of change	Description
AMC2 147.A.133(b) Contracted activities	new	This new AMC incorporates AMC 147.A.145(d) points (1) and (2) related to training standards.
GM1 147.A.133(b) Contracted activities	new	This new GM is added to clarify the meaning of 'subcontracting' in the context of Part-147.
GM2 147.A.133(b) Contracted activities	new	This new GM incorporates GM 147.A.145 (d) and GM 147.A.145(d)3 'Privileges of the maintenance training organisation' and provides clarification on limitations.
147.A.135 Examinations	amended	Point (a) has been amended to make clear that the need to ensure confidentiality of questions concerns all staff involved in the preparation and conduct of examinations, as well as all staff having access to the examination database. Points (b) and (c) have been amended in line with legal drafting principles (by use of active speech).
GM to 147.A.135 Examinations	deleted	As this is addressed to the competent authority, it has been moved to Section B in the form of a new IR 147.B.315 'Disqualification of knowledge examiners'.
147.A.140 Maintenance training organisation exposition	amended	This IR has been aligned with similar provisions in Part-145, to reflect changes made in relation to management system and to adapt to the new provisions on changes requiring prior approval versus changes not requiring prior approval. All items relating to procedures have been grouped.
AMC1 147.A.140 Maintenance training organisation exposition	amended	The AMC has been amended for consistency with changes made to Part-M and Part-145 and to reflect changes in relation to provisions on contracting. Point 4 has been deleted, as the issue is now addressed through the provisions on changes not requiring prior approval.
147.A.145 Privileges of the maintenance training organisation	amended	The text has been amended by extracting provisions related to subcontracting (points (d)(2) and (d)(3)), now included as a stand-alone implementing rule 147.A.133 'Contracting'. Further changes have been made for consistency.
AMC 147.A.145(d) Privileges of the maintenance training	deleted	This is now included as AMC2 147.A.133(b) 'Contracting'.

Reference	Type of change	Description
organisation		
GM 147.A.145(d) Privileges of the maintenance training organisation	deleted	This is now included as AMC1 147.A.133(b) for point 1 and GM1 147.A.133(b) for points (2) and (3).
GM 147.A.145(d)3 Privileges of the maintenance training organisation	deleted	This is now included as AMC1 147.A.133(b) point (d).
AMC1 147.A.145(f) Privileges of the maintenance training organisation	amended	Some editorial changes have been made and the example has been extracted as a separate GM, in line with legal drafting principles.
GM1 147.A.145(f) Privileges of the maintenance training organisation	new	This new GM includes the last paragraph of AMC1 147.A.145(f).
147.A.148 Means of compliance*	new	A new provision has been added to align with Part-ORX related to the use of alternative means of compliance.
AMC1 147.A.148 Means of compliance*	new	This new AMC introduces the elements of AMC1 to with ORX.GEN.120(a).
147.A.150 Changes to the organisation*	amended	The text has been reviewed to align with ORX.GEN.130. It now introduces the concept of changes not requiring prior approval in replacement of the indirect approval procedures.
AMC1 147.A.150 Changes to the organisation*	new	This new AMC on application timeframes is based on AMC1 ORX.GEN.130.
AMC2 147.A.150 Changes to the organisation*	new	This new AMC is included to make a link with safety risk management as defined in AMC1 145.A.65(a)(3), as related to the management of changes.
AMC3 147.A.150 Changes to the organisations	new	This new AMC is included to incorporate elements previously included with AMC to 147.B.110 related to additional basic or aircraft type training courses.

Reference	Type of change	Description
AMC4 147.A.150 Changes to the organisations	new	This new AMC is included to incorporate elements previously included with AMC to 147.B.110 related to a change of accountable manager or senior personnel.
AMC5 147.A.150 Changes to the organisations	new	This new AMC is included to incorporate elements previously included with AMC to 147.B.110 related to a change of location.
GM1 147.A.150 (a) Changes to the organisation*	new	This new GM has been added to align with GM to ORX.GEN.130. It introduces a list of changes that normally require prior approval. Point (a)(2) has been added to address cases such as a change in ownership. A change in legal entity will require prior approval if this change affects basic elements of the organisation. Conversely, a change of ownership <u>not</u> affecting the aforementioned basic elements should not require prior approval. In general, it can be stated that any change, in ownership or not, would require prior approval if it would affect/alter the basic elements (previously identified in the rule) of the organisation and its approval.
GM2 147.A.150 (a) Changes to the organisation*	new	This new GM 'change of name of the organisation' has been added to align with Part-ORX (cf. GM2 ORX.GEN.130(a)).
147.A.155 Continued validity*	amended	Minor changes have been made in order to align with Part-ORX.
147.A.157 Access*	new	A new provision on providing access to the organisation has been added to align with ORX.GEN.140.
147.A.160 Findings*	amended	This provision has been amended to align with Part-ORX (ORX.GEN.150). The definition of finding levels is now included with Section B as the assessment is to be made by the authority.
AMC1 147.A.160 Findings*	new	A new AMC has been added to align with Part-ORX AMCs (cf. AMC1 ORX.GEN.150(b)).
GM1 147.A.160 Findings*	new	A new GM has been added to align with Part-ORX (cf. GM1 ORX.GEN.150). It provides relevant ISO 9000:2005 definitions.
GM2 147.A.160 Findings*	new	This new GM on root cause analysis has been added.
147.A.170 Immediate reaction to	new	This new provision has been added to align with ORX.GEN.155 and to create the

Reference	Type of change	Description
a safety problem*		counterpart for new 147.B.135(d). This may be, for example, action required to exclude a student, or an examiner, or to make a change in the questions database.
147.B.105 Scope	renumbered, amended	The existing Implementing Rule 147.A.05 is now included as 147.B.105. The text has been aligned with that used in Part-145 and Part-M.
147.B.10 Competent authority	deleted	This IR has been deleted as the issues are now addressed in the Cover Regulation (cf. new Article 7 on Oversight Capabilities) and in new IR 147.B.200 'Management System'.
AMC 147.B.10(a) Competent authority	deleted	This AMC has been deleted and its text is now included as AMC1 147.B.200.
AMC 147.B.10(b) Competent authority	deleted	This AMC has been deleted and its text is now included as AMC2 147.B.200(a)(3).
AMC 147.B.10(c) Competent authority	deleted	This AMC has been deleted and its text is now included as AMC1 147.B.200(a)(1).
147.B.115 Oversight documentation*	new	A new provision has been added to align with ARX (cf. ARX.GEN.115). It complements the new Cover Regulation Article 'Oversight capabilities'.
147.B.120 Means of compliance *	new	A new provision has been added to align with ARX.GEN.120. This forms the counterpart to the new provisions in 147.A.148.
AMC1 147.B.120(d)(3) Means of compliance*	new	A new AMC has been added to align with ARX.GEN.120 related AMCs (cf. AMC1 ARX.GEN.120(d)(3)). It states what type of information should be made available to other Member States following approval of an alternative means of compliance.
GM1 147.B.120 Means of compliance*	new	A new GM has been added to align with ARX.GEN.120 related GM (cf. GM1 ARX.GEN.120).
147.B.125 Information to the Agency *	new	A new provision has been added to align with ARX.GEN.125.

Reference	Type of change	Description
147.B.135 Immediate reaction to a safety problem*	new	A new provision has been added to align with ARX.GEN.135.
147.B.20 Record keeping	deleted	This IR has been removed and is reintroduced with new IR 147.B.220, to align with ARX.GEN.220.
AMC 147.B.20 Record keeping	deleted	This AMC has been removed and its elements reintroduced with the AMC to new IR 147B.220, to align with ARX.GEN.220.
147.B.25 Exemptions	deleted	This IR has been included with the Cover Regulation as new Article 10 as it is addressed to the Member State and not to the competent authority.
SUBPART B	new heading	A new Subpart heading has been added: SUBPART B – MANAGEMENT SYSTEM
147.B.200 Management system*	new	A new provision has been added to align with ARX.GEN.200. Point (a)(2) of ARX.GEN.200 has been included as two distinct points (a)(2) and (a)(3) to differentiate between provisions related to the number of staff and those related to training and qualification. This allows to better focus the related AMCs on those two aspects.
AMC1 147.B.200 Management system*	new	AMC 147.B.10(a) 'Competent authority' is now included as AMC to new 147.B.200. The text has been further amended to align with Part-ARX.
GM1 147.B.200 Management system*	new	A new GM has been added to align with GM1 ARX.GEN.200(a) related to competent authority organisation – general.
AMC1 147.B.200(a)(1) Management system*	new	This new AMC on documented policies and procedures has been added to transpose AMC1 ARX.GEN.200(a)(1).
GM1 147.B.200(a)(2) Management system*	new	This new GM has been added to transpose GM1 ARA.GEN.200(a)(2) on sufficient personnel.
AMC1 147.B.200(a)(3) Management	new	This new AMC on qualification and training general has been added to transpose AMC1 ARX.GEN.200(a)(2).

Reference	Type of change	Description
system*		
AMC2 147.B.200 (a)(3) Management system*	new	AMC 147.B.10(b)(c) on the qualification and training of inspectors is now included as AMC2 147.B.200(a)(3). Editorial changes have been made for consistency. In point (a)(2) a reference to management systems has been added (comprehensive knowledge of quality management and safety management systems required).
AMC3 147.B.200 (a)(3) Management system*	new	A new AMC has been added to transpose ARX (cf. AMC2 ARX.GEN.200(a)(2)) on initial and recurrent training for competent authority inspectors.
AMC4 147.B.200 (a)(3) Management system*	new	This new AMC on competence assessment has been added in response to recurrent standardisation findings.
AMC1 147.B.200(d) Management system*	new	This new AMC specifying the procedures to be made available to the Agency for the purpose of standardisation has been added to transpose ARX (cf. AMC1 ARX.GEN.200(d)).
147.B.205 Allocation of tasks to qualified entities*	new	This new provision has been added to align with ARX.GEN.205.
GM1 147.B.205 Allocation of tasks to qualified entities*	new	A new GM has been added to align with Part-ARX. It clarifies which tasks can be allocated to a qualified entity.
147.B.210 Changes in the management system*	new	A new provision has been added to align with ARX.GEN.210. This mirrors the change management provisions introduced in Section A.
147.B.220 Record keeping*	new	147.B.20 'Record keeping' is now included as 147.B.220. The text has been reviewed to align with ARX.GEN.220.
AMC1 147.B.220(a) Record keeping*	new	AMC 147.B.20 is now included as AMC 147.B.220(a). The text has been reviewed to align with ARX.GEN.220 related to management system records.
AMC1 147.B.220 (a)(1) Record keeping*	new	A new AMC has been added to transpose ARX (cf. AMC2 ARX.GEN.200(a)(1),(2),(3)). It defines competent authority management system records.

Reference	Type of change	Description
AMC1 147.B.220(a)(4) Record keeping*	new	A new AMC has been added to transpose ARX (cf. AMC1 ARX.GEN.200(a)(4)). It lists records to be kept related to organisations the competent authority has approved.
GM1 147.B.220 Record keeping*	new	A new GM has been added to align with Part-ARX. It clarifies version control as applied to records.
GM1 147.B.220(a)(4) Record keeping*	new	A new GM has been added to align with Part-ARX (cf. GM1 ARX.GEN.220(a)(4)). It clarifies what type of records are expected in relation to the organisation's management system and technical documentation.
SUBPART B ISSUE OF A APPROVAL	heading deleted	This Subpart heading has been deleted in line with changes made to the Subpart, now included as SUBPART C - OVERSIGHT, CERTIFICATION AND ENFORCEMENT
147.B.300 Oversight principles *	new	A new provision has been added to align with ARX.GEN.300. The title now refers to 'oversight principles' in order to differentiate these general provisions from the more specific ones dealing with the 'continuation' of an approval.
147.B.120 Continued validity procedure	deleted	This IR has been deleted, the issue is now addressed in new 147.B.305 'Oversight programme'.
AMC 147.B.120(a) Continued validity procedure	deleted	This AMC has been deleted as it is superseded by the new AMCs to new 147.B.305.
147.B.305 Oversight programme *	new	A new provision has been added to align with ARX.GEN.305.
AMC1 147.B.305 (a);(b) Oversight programme*	new	This new AMC has been added to define an annual review of the audit programme and the audit planning cycle to ensure they remain appropriate.
AMC1 147.B.305 (b) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(b) on the aspects to be considered when determining the oversight programme for an organisation.
AMC2 147.B.305 (b) Oversight	new	A new AMC has been added to align with AMC1 ARX.GEN.305(b);(c) on oversight of

Reference	Type of change	Description
programme*		organisations having demonstrated compliance with industry standards.
AMC1 147.B.305 (b)(1) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(b)(1)) and similar provisions in Part-145.
AMC1 147.B.305 (b)(3) Oversight programme	new	This new AMC incorporates the elements of AMC 147.B.120(a) 'Continued validity procedure' related to the sampling of training courses and examinations.
AMC1 147.B.305 (c) Oversight programme*	new	A new AMC has been added to align with AMC1 ARX.GEN.305(c) related to determining the oversight planning cycle based on a risk assessment for the organisation under consideration.
AMC2 147.B.305 (c) Oversight programme*	new	A new AMC has been added to align with AMC2 ARX.GEN.305(c) related to the elements of oversight planning. This also specifies the conditions for granting credits for specific audit items.
AMC1 147.B.305 (d) Oversight programme*	new	This new AMC has been added to define an annual validation inspection to confirm the audit programme and audit planning cycle when it is extended beyond 24 months.
AMC2 147.B.305 (d) Oversight programme*	new	This new AMC has been added for the competent authority to define the format and methods of safety reporting when the audit planning cycle is extended beyond 36 months.
GM1 147.B.305 Oversight programme*	new	This new GM explains the terms 'audit', 'inspection', oversight planning cycle', and oversight programme'.
147.B.110 Procedures for approval and changes to the approval	deleted	This IR is superseded by the new 147.B.310 'Initial certification procedure' and 147.B.330 'Changes'.
AMC 147.B.110(a) Procedure for approval and changes to the approval	deleted	This AMC has been deleted, and the issue is now addressed in the new AMC1 147.B.310 (a) 'Initial certification procedure'.
AMC 147.B.110(b) Procedure for approval and changes to the	deleted	This AMC is superseded by the new AMCs to 147.B.310 'Initial certification procedure'

Reference	Type of change	Description
approval		and 147.B.330 'Changes'.
147.B.310 Initial certification procedure *	new	This new IR has been added to align with ARX.GEN.310.
AMC1 147.B.310(a) Initial certification procedure *	new	This new AMC on verification of compliance has been added to align with Part-ARX (cf. AMC1 ARX.GEN.310(a)).
AMC2 147.B.310(a) Initial certification procedure	new	This new AMC has been added to form the counterpart to the AMC1 147.A.105 related to the combination of functions in smaller maintenance training organisations.
AMC1 147.B.310(a);(b) Initial certification procedure	renumbered, title and text changed	<p>GM to 147.B.110 'Procedure for approval and changes to the approval' is now included as AMC1 147.B.310(a);(b).</p> <p>New text has been added in point (c) to clarify that for training and/or examinations away from the maintenance training organisation a sample audit should be programmed at least twice during the oversight planning cycle and in any case within the first six months from the date of the initial issue of the Part-147 certificate.</p> <p>Further editorial changes have been made for consistency with changes made throughout Part-147. All items relevant to a change (points (g) to (n)) have been deleted, and they are now covered under 147.B.330 and new AMCs to 147.A.150.</p>
AMC1 147.B.310(c) Initial certification procedure	new	This new AMC incorporates elements previously addressed with AMCs to 147.B.110.
147.B.120 Continued validity procedure	deleted	This IR has been deleted, as the issue is now addressed in the new 147.B.305 'Oversight programme' and related AMCs.
AMC 147.B.120(a) Continued validity procedure	deleted	This AMC has been deleted in line with the deletion of 147.B.120.
147.B.125 Maintenance training organisation approval certificate	deleted	This IR has been deleted, and the issue is now addressed in new 147.B.310 'Initial certification procedure'
147.B.315 Disqualification of knowledge examiners	new	This new IR has been added to create a counterpart in Section B to 147.A.135 point (c) on the information to the competent authority following disqualification of a knowledge

Reference	Type of change	Description
		examiner.
147.B.330 Changes *	new	This new IR has been added to align with ARX.GEN.330.
AMC1 147.B.330 Changes*	new	This new AMC has been added to align with AMCs to ARX.GEN.330.
GM1 147.B.330 Changes *	new	This new GM on change of name of the organisation has been added to align with GM1 ARX.GEN.330.
147.B.130 Findings	deleted	This IR has been deleted and superseded by the new 147.B.350.
AMC 147.B.130 Findings	deleted	This AMC has been deleted, and the time period for implementing corrective action is now addressed in 147.B.350.
147.B.350 Findings and corrective actions*	new	This new IR 'Findings and corrective actions' has been added to align with ARX.GEN.350. This ensures the same definitions for level 1 and level 2 findings are used for ATOs, Aero-medical Centres, Operators, Part-M Subpart F, Part-M Subpart G, Part-145, and Part-147 organisations.
SUBPART C REVOCATION, SUSPENSION AND LIMITATION OF THE MAINTENANCE TRAINING ORGANISATION APPROVAL	heading deleted	This Subpart heading has been deleted in line with changes made to the Subpart designation, now included as SUBPART C - OVERSIGHT, CERTIFICATION, AND ENFORCEMENT to align with ARX.
147.B.355 Suspension, limitation, and revocation	amended	Former 147.B.200 'Revocation, suspension and limitation of the maintenance training organisation approval' is now included as 147.B.355 'Suspension, limitation, and revocation' to align with ARX.GEN.355. A new item (c) is added to consider cases where due to the security situation in a particular State, the competent authority is unable to perform any audits over a period of 24 months.
AMC1 147.B.355(c) Suspension, limitation and revocation	new	This new AMC complements the new 147.B.355(c), and it introduces a link with the EU monitoring of security in third-countries.
Appendices to the IRs		
Appendix II — Maintenance	title and form	The title and text have been changed for consistency with changes made throughout

Reference	Type of change	Description
Training and Examination Organisation Certificate referred to in Annex IV (Part-147) – EASA Form 11	amended	Part-147.
Appendix III Certificate of Recognition	amended	<p>Editorial changes have been made for consistency. In the line 'SPECIFY THEORETICAL ELEMENTS OR PRACTICAL ELEMENTS' the 'or' has been changed to 'and/or', to clarify that the certificate may be used for theoretical, practical or both elements on one certificate.</p> <p>In the following line "and/or" has been changed to "or" to make clear that the following two rows do not apply for the aircraft type training course. The date(s) of examination(s) for the aircraft type training course is/are already included in the [START and END DATES]. In addition, the end date of the type examination during the aircraft type training course is not relevant, as the 3-year time limit starts with the start date of the aircraft type training course.</p>
Appendices to AMCs		
APPENDIX I — Maintenance training organisation exposition (MTOE)	amended	The MTOE guidance and contents have been reviewed to include the new safety management related elements, a reference to the new procedure for applying for an alternative means of compliance, and the procedure for the management of changes not requiring prior approval.

Reference	Type of change	Description
APPENDIX III — PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22	amended	<p>The report has been reviewed to reflect changes made to Sections A and B of Part-147. It now provides for distinct sections for the different types of oversight:</p> <ul style="list-style-type: none">- Initial certification- Sampling of training courses and examinations- Programme validation inspection- Change to an existing approval- Regular oversight for continued validity of the approval <p>Further editorial changes have been made.</p>
APPENDIX IV — APPLICATION FOR PART-147 INITIAL/CHANGE OF APPROVAL EASA Form 12	amended	Minor changes have been made for consistency.