



TERMS OF REFERENCE

Task Nr: RMT.0276 (MDM.076)
Issue: 1
Date: 28 November 2011
Regulatory reference: Commission Regulation (EC) No 2042/2003¹: Part-M and Part-145

Reference documents:

- ICAO Annex 6 — Operation of Aircraft
- Directive 1999/93/EC of the European Parliament and of the Council of 13 December 1999 on a Community framework for electronic signatures²
- Study on Cross-Border Transferability (by the Aviation Working Group (AWG))

1. Subject: Technical records

2. Problem/statement of the issue and justification; reason for regulatory evolution (regulatory tasks):

Incomplete records may lead to a wrong assessment of the airworthiness status of the product with a consequent safety risk.

Feedback received from industry and NAAs shows the following issues:

- Inconsistency in the use of the terms 'Life Limited Parts' and 'Service Life Limited Parts';
- Different interpretations as to which components require an EASA Form 1 or equivalent, and which documents are considered equivalent to an EASA Form 1;
- Different interpretations of the need for 'back to birth' traceability;
- Inconsistency in 145.A.55 of the record-keeping periods and the periods applicable to the transfer of records;
- Lack of guidance on the use of electronic signature;
- Lack of guidance on the acceptability of records copies (scanned, photocopy);
- Lack of guidance on the acceptability of new technology, such as RFID (Radio Frequency Identification);
- Lack of harmonisation with the FAA requirements in relation to continuing airworthiness records.

¹ 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 (OJ L 315, 28.11.2003, p. 1). Regulation as last amended by Regulation (EU) No 962/2010 of 26 October 2010 (OJ L 281, 27.10.2010, p. 78).

² OJ L 13, 19.1.2000, p. 12.

Additionally, EASA intends to address a Safety Recommendation made by the UK (ref.: UNKG-2007-091): 'It is recommended that the European Aviation Safety Agency (EASA) amend EASA Part 145 (and Part M as necessary) to require that maintenance and overhaul records that are referred to in airframe, engine and propeller log books, and component record cards, are deemed to be part of that log book or record card and are retained until the aircraft, engine, propeller or component has been destroyed or permanently removed from service.'

3. Objective:

The current task will address issues related to continuing airworthiness and maintenance records, and in particular the above-mentioned issues.

However, the current task will not cover the acceptance of the technical records while transferring an aircraft registration, as this issue will be covered by the rulemaking task MDM.078.

4. Specific tasks and interface issues (Deliverables):

Task leading to Opinion and Decision.

5. Working method (in addition to the applicable Agency's procedures):

Group

6. Timescale, milestones:

NPA: 2013/Q3

CDR: 2014/Q3

Opinion: 2015/Q1

Decision: Within one trimester from adoption of the Opinion by the European Commission.