



European Aviation Safety Agency

Rulemaking Directorate

EXPLANATORY NOTE

DECISION No 2013/005/R

Aircraft Continuing Airworthiness Monitoring

EXECUTIVE SUMMARY

As part of their continuing airworthiness oversight system, competent authorities are required to develop a survey programme to monitor the airworthiness status of the fleet of aircraft on their register, referred to as 'Aircraft Continuing Airworthiness Monitoring' (ACAM, cf. M.B.303). The survey programme shall be developed by selecting a relevant sample of aircraft and shall include an aircraft survey, focusing on a number of key airworthiness risk elements.

Appendix III to AMC M.B.303(d) 'Aircraft Continuing Airworthiness Monitoring – Planning & Recording Document' defines those key risk elements for the aircraft surveys to be conducted by competent authorities.

Feedback from competent authorities and typical findings encountered during standardisation inspections indicate that ACAM requirements and key risk elements are not consistently and uniformly applied in all Member States. The existing rule material and related Acceptable Means of Compliance (AMC) and Guidance Material (GM) have, therefore, been reviewed to improve clarity and to include additional guidance, including typical inspection items, on the use of Key Risk Elements (KREs). The changes proposed aim at enhanced efficiency of the ACAM programme, both in terms of flight safety and better use of competent authority resources, without creating additional burden for competent authorities or aircraft owners/operators.

This Decision covers those elements of the AMCs and GM that are not bound by the adoption of the changes at Implementing Rule level, as proposed with Opinion 02/2013. Upon adoption of the regulatory changes proposed with Opinion 02/2013 a second Agency Decision will be issued to publish the remaining changes to/new AMCs and GM.

Acceptable Means of Compliance and Guidance Material to Part-M

I. General

Background

On 22 March 2013 the European Aviation Safety Agency (hereafter referred to as the 'Agency') issued Opinion 02/2013 related to 'Aircraft Continuing Airworthiness Monitoring' (ACAM).

Pursuant to Article 18 of the Basic Regulation the Agency shall, where appropriate, issue AMC as well as GM for the application of the Basic Regulation and its Implementing Rules.

Agency measures

AMC illustrate a means, but not the only means, by which a requirement of an Implementing Rule can be met. Satisfactory demonstration of compliance using published AMC shall provide for presumption of compliance with the related requirement; it is a way to facilitate certification tasks for the applicant and the competent authority.

GM is issued by the Agency to assist in the understanding of the Basic Regulation, its Implementing Rules and Certification Specifications (CSs).

General structure and format

This Decision complements the changes at implementing rule level proposed with Opinion 02/2013 related to 'Aircraft Continuing Airworthiness Monitoring'. It covers those elements of the AMCs and GM to M.B.303 that are not bound by the adoption of the changes at implementing rule level, as proposed with Opinion 02/2013. Upon adoption of the regulatory changes proposed with Opinion 02/2013 a second Agency Decision will be issued to publish the remaining AMCs and GM material.

The AMCs and GM concerned are listed below, identifying those included with this Decision (Decision A) and those that will be included with the decision to be published upon adoption of the Opinion (Decision B):

N	Reference	Decision	Subject	Type of change
1	AMC 1 M.B.102(c)	Decision B	competent authority – qualification and training	former AMC M.B.102(c) now AMC1 M.B.102(c)
2	AMC 2 M.B.102(c)	Decision B	competent authority – qualification and training ACAM inspection qualification requirements	new AMC
3	AMC M.B.303	n/a	adapted airworthiness survey programme for the aircraft for which it performs the airworthiness review	AMC deleted – the issue is now addressed in GM1 M.B.303(a).
4	AMC 1 M.B.303(a)	Decision B	ACAM survey programme – Scope	new AMC
5	AMC 2 M.B.303(a)	Decision B	ACAM survey programme – Crediting	new AMC
6	GM 1 M.B.303(a)	Decision B	combined surveys	new GM
7	AMC 1 M.B.303(b)	Decision A	scope of surveys	Former AMC M.B.303 (b), now AMC1 M.B.303(b), text amended
8	AMC 2 M.B.303(b)	Decision A	in-depth survey	new AMC
9	AMC 3 M.B.303(b)	Decision A	key risk elements	new AMC

10	GM 1 M.B.303(b)	Decision A	key risk elements	new GM
11	AMC M.B.303 (c)	Decision B	annual programme of surveys	AMC deleted, incorporated into AMC1 M.B.303(a)
12	AMC M.B.303(d)	Decision A	conduct of surveys	AMC deleted, replaced by new AMC 2 M.B.303 (b) and new GM 1 to M.B.303(b)
13	AMC 1 M.B.303(d)	Decision B	findings analysis	new
14	AMC M.B.705(a)(1)	Decision B	level 1 / level 2 findings	as a result of the changes made to M.B.303, item (2) of the AMC is amended
15	Appendix III to GM 1 M.B.303(b)	Decision A	key risk elements – detailed guidance ¹	renumbered Appendix III to GM 1 M.B.303(b) and replaced

Publication

The full text of these AMC as well as GM is available on the Agency's [website](#).

For more information, contact the Agency at: RPS@easa.europa.eu.

II. Consultation

1. The draft Executive Director Decision amending Decision N° 2003/02/RM/Opinion for amending Regulation (EC) 216/2008 was published on the web site (<http://www.easa.europa.eu>) on 29 November 2011. By the closing date of 1 March 2012, the Agency had received 85 comments from 20 National Aviation Authorities (NAAs), professional organisations and private companies.
2. The corresponding CRD was published on 19 July 2012. By the closing date of 19 September 2012 the Agency had received 11 reactions from 6 NAAs and 5 professional organisations. Among these, three reactions expressed general support with the changes proposed; one reaction indicated that changes were noted without comments; and 7 reactions indicated specific concerns or suggested additional changes. These issues raised in these reactions are further described in Opinion 02/2013.

III. Summary of changes – AMCs and GM

3. The text of AMC M.B.303(b), now included as **AMC1 M.B.303(b)**, is amended for consistency of wording. A statement is added on the need to perform a physical inspection during each ACAM survey to clarify the meaning of product survey. The reference to 'in-flight surveys' is deleted.

This AMC has been further amended:

- by deleting paragraph (c), which does not align with the previous paragraph calling for effective continuing airworthiness management; and
- by adding a new paragraph (3) to indicate that when performing a ramp survey, the inspector(s) should make all possible efforts to avoid an unreasonable delay of the aircraft inspected.

4. A new **AMC2 M.B.303(b)** is added; it incorporates elements from former AMC M.B.303(d) and provides the link to the new Appendix III to GM 1 M.B.303(b) with the description of the KREs.

¹ This Appendix will be subject to annual review through a recurrent rulemaking task, to ensure references remain up to date. This annual review will also allow assessing the appropriateness of all supporting information and typical inspection items included, so as to ensure that this information remains pertinent with regard to the airworthiness key risk areas identified.

5. A new **AMC3 M.B.303(b)** is added to introduce the 13 KREs, thus creating a link between M.B.303(b) and Appendix III to GM 1 M.B.303(b). The new AMC further clarifies that the KREs and their detailed components should be adapted to the complexity of the aircraft type being surveyed by retaining only those items that are applicable and relevant for the particular aircraft type.
6. A new **GM1 M.B.303(b)** is added to clarify the need to address all KREs through the ACAM survey programme, whereas for a specific inspection a selection of KREs may be used, depending on the time available for the inspection and the KREs that are prioritised in the survey programme (cf. AMC 1 M.B.303(a) point (3)).
7. AMC M.B.303(d) is deleted, it is replaced by the new **AMC2 to M.B.303 (b)** and new **GM1 to M.B.303(b)**.
8. Appendix III to AMC M.B.303(d) is now included as **Appendix III to GM 1 M.B.303(b)**. The order of KREs has been changed and KREs grouped in three broad categories:
 - A. Aircraft Configuration;
 - B. Aircraft Operation;
 - C. Aircraft Maintenance.

For each of these elements detailed guidance has been added to include a description of the KRE, provide supporting information, list typical inspection items and provide relevant regulatory references.

Following publication of the CRD the following additional changes have been made:

- All references to EU-OPS have been replaced with the relevant EASA OPS references according to Commission Regulation (EU) 965/2012.
- The supporting information in KRE A.1 and C.3 has been updated to consider changes introduced with amending Commission Regulation (EU) 593/2012 related to the introduction of standard changes and standard repairs in EASA Part 21.
- The supporting information and typical inspection items in KRE C.1 'Aircraft Maintenance Programme' has been reviewed for consistency to align with AMC M.A.302(e) example Maintenance Programme proposed with NPA 2012-17 'Part-M General Aviation Task Force (Phase I)'.