Facilitating aircraft transferability:

- Technical Records;
- Transfers; and
- Imports

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EASA is an agency of the European Union
Goal of the presentation: provide information on current CAW rulemaking activities related to these topics

TOPICS

➤ Regulatory framework

➤ Tech Records

➤ Transfer/Import processes
EASA regulatory framework
Facts and figures

Established
2002

10 years+
in operation

800+
aviation experts
& administrators

Headquarters in
Cologne
Office in
Brussels

32 EASA member states
= 28 + 4
EU + Switzerland, Norway
Iceland, Liechtenstein

15 Nov 2016
3 rd IATA Paperless Aircraft Operations
Partnership with EU Member States

- Implementing EU Legislation
- Oversight of national organisations
  - Production
  - Maintenance
  - OPs/Licencing
  - Training
  - ATM
  - Aerodromes

- Implementing rules
- Oversight of Member States
- Aircraft and products certification
- Safety of non-EU operations
- Approval of non-EU organisations
  - Production
  - Maintenance
  - Training
  - ATM
RMT relevant to this presentation

- **RMT.0276** NPA 2014-04 (Feb 14)
  - Technical Records
  - Opinion

- **RMT.0521** NPA 2015-17 (Nov 15)
  - Airworthiness Review Process:
    - contains the transfer process review

- **RMT.0278** NPA 2016-08 (Sept 16) – open comment period -
  - Import of Aircraft from other Regulatory Systems
Technical Records

... and current regulatory proposals
Tech Records – proposal (1/2)

A/C total hours/cycles

- Aircraft Record Summaries
  - Airworthiness Directives
  - Modifications & Repairs
  - Status of Compliance with the AMP
  - Mass & Balance Status
  - Status of Deferred Maintenance
  - Status of Time Controlled Components (TCC)
  - Technical Log
  - AD Compliance Documents
  - Aircraft Modifications & Repairs
  - Scheduled Maintenance
  - LLP status and ‘in service history’
  - Detailed maintenance records for LLP’s and TCC
  - Flight Log (12 months)
  - Last Status reports (12 months)
  - Last Detailed maintenance records (12 months)

- Component Record Summaries
  - ‘Service Life limited’ – deleted
  - ‘Time Controlled Component’ – intro.
  - Component Records Clarified
  - ‘In Service History’ for LLP’s
  - Detailed Maintenance Records clarified

- Detailed Maintenance Records during Operation

- Detailed Maintenance Records at Retirement
M.A. 305 limits the burden on owners/CAMOs to keep only those records needed to establish the airworthiness status of the Aircraft.

Retention of component records limited to LLP’s & TCC’s (unless the form contains information necessary to satisfy other parts of M.A. 305 e.g. AD’s).

Extensive guidance material is provided.

Clearer requirements on technical records facilitates the understanding and implementation.

Beneficial to both industry and competent authorities, helping in the cross-border transferability of aircraft between different regulatory systems.
Description of import/transfer processes

... and current regulatory proposals
TRANSFER: application CofA

**Used aircraft**

Applicant inform the former MS and apply to the new MS

**Applicant**
- ARC

**NAA**
- Validation ARC with new registration
- Issuance of CofA
- Inspections?
Clarify some concepts
The process starts when the former MS is informed and the application to the new MS is done

- Valid ARC
- If overdue during the transfer period
- Validation ARC with new registration
- Increased oversight with ACAM and product surveys when oversight organisations
**IMPORT: application CofA**

**Used aircraft**

**Applicant**
- Statement reflecting the AIW status of a/c
- Historical records (...) maintenance standard
- Recommendation for the issuance of ARC
  - Who?
  - How?
  - Maintenance?

**NAA**
Checks that the a/c conforms to an approved design (this may include inspections)

Bilateral. For example, EU – USA BASA Roadmap
http://www.easa.europa.eu/document-library/bilateral-agreements/eu-usa#group-easa-downloads

Recognition of maintenance organisations
Transfer from Member State or Import with Transfer Cert

Issue:
- Delays in transferring aircraft within EASA Member States
- Uncertainty about scope of airworthiness review & records for Import from non-EU state where Transfer Certificate (e.g. Export CoA) is provided

Proposal:
- If not valid ARC although coming from a MS, it is treated as an import
- Application process clarified in Part-21
- Include configuration assessment in the review, recognising foreign system procedures & scope of record review if they are iaw M.A.305
To determine the work for the Airworthiness review, consider:

- Information from 3rd country such as the **export certificate**
- **Record system requirements** equivalent to those specified in M.A. 305 & 306
- Missing records may be reconstructed in accordance with AMC M.A. 305 (h)
- **Acceptance of previous foreign maintenance** if the standards are deemed equivalent to Annex 1 (Part-M)
- Repaired parts subject to scheduled maintenance (e.g. inspections or overhaul) to be accompanied by Form 1’s or equivalent
- Bridging maintenance to any new AMP & mods required for EASA TC compliance
Import proposal: case 2 (1/2)

No transfer certificate at Import or integrating ex “state aircraft”

Issue:

- Uncertainty regarding process to import aircraft where no export certificate was issued
- Uncertainty regarding process to restore airworthiness status of Member State aircraft
- Uncertainty regarding process to integrate State Aircraft into EASA system

Proposal:

- **Evaluation programme** done by CAMO and presented to CA for approval
- Accepted evaluation programme conducted by CAMO: report and recommendation to issue ARC
- **Assessment** done by CA. If positive, issuance of CofA and ARC.
Information Preconditions

- Sufficient historical records to satisfy M.A. 305 (Tech records) or allow reconstruction

Evaluation Programme

- Among others:
  - Identify events that required unscheduled maintenance & remedial actions taken to restore airworthiness
  - Inspection plan to:
    - verify the aircraft configuration
    - review previous mods & repairs (including those related to unscheduled maintenance)
    - previous maintenance standards
Comments are welcome

» RMT.0278 NPA 2016-08 (Sept. 16) – open comment period -

Import of Aircraft from other Regulatory Systems
Questions?

Thank you

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