

The starting point was this opinion

OPINION No 02/2008
OF THE EUROPEAN AVIATION SAFETY AGENCY
of 15 May 2008

f) Accept directly US and Canadian release documents for maintained components

26. Many organisations and aircraft owners currently hold in stock components that were released after maintenance with the correspondent FAA 8130-3 or TCCA 24-0078 forms; however these forms were not issued by organisations approved in accordance with Community law and, as a consequence, they cannot be installed after 28 September 2008. Furthermore maintenance organisations in USA and Canada performing maintenance on components installed in General Aviation aircraft do not seem interested in holding a European approval. This could lead to a shortage of approved maintenance organisations to cover the needs of the European General Aviation community.

27. The Agency will therefore clarify in AMC M.A.613(a) that an M.A.Subpart F or Part-145 maintenance organisation (not rated for components) may issue a Form 1 after appropriate checks and verifications, for components that have been released after maintenance with an 8130-3 (FAA) or TCCA 24-0078 (Canada) without dual release. This alleviated procedure is based on the technical capability of these organisations and the confidence we can have in the oversight performed by the American and Canadian competent authorities, based on the assessments made for concluding the pending bilateral aviation safety agreements with these countries.

AMC MA 613(a) was updated in April 2010 as follows:

In the case of used components maintained by an FAA Part-145 repair station (USA) or by TCCA CAR573 approved maintenance organisations (Canada) that does not hold an EASA Part-145 or M.A. Subpart F approval, the conditions (a) through (d) described above may be replaced by the following conditions:

- (a) availability of an 8130-3 (FAA) or TCCA 24-0078 (TCCA) or an Authorized Release Certificate Form One (TCCA) certificate of release to service,
- (b) verification of compliance with all applicable airworthiness directives, and
- (c) verification that the component does not contain repairs or modifications that have not been approved in accordance with Part-21,
- (d) inspection for satisfactory condition including in particular damage, corrosion or leakage,
- (e) issuance of a Form 1 in compliance with paragraphs 2.2, 2.3 and 2.4.

These alleviated requirements are based on the fact that credit can be taken for their technical capabilities and their competent authority oversight, as attested by the following documents:

- BASA/MIP-G Maintenance Implementation Procedures Guidance (USA),
- AAM-G Administrative Arrangement on Maintenance Guidance (Canada)

For reference, paragraphs 2.2-2.4 are as follows:

2.2 An appropriately rated M.A Subpart F maintenance organisation may issue an EASA Form 1 as detailed in this AMC subparagraph 2.5 to 2.9, as appropriate, in accordance with the procedures detailed in the manual as approved by the competent authority. The appropriately rated M.A Subpart F maintenance organisation is responsible for ensuring that all reasonable measures have been taken to ensure that only approved and serviceable aircraft components are issued an EASA Form 1 under this paragraph.

2.3. For the purposes of this paragraph 2 only, 'appropriately rated' means an organisation with an approval class rating for the type of component or for the product in which it may be installed.

2.4. An EASA Form 1 issued in accordance with this paragraph 2 should be issued by signing in block 20 14b and stating 'Inspected' in block 12 11. In addition, block 13 12 should specify:

Comment [AS1]: Note: this is a single release 8130 from e.g. a small repair station

Comment [AS2]: So the subpart-F shop needs to make sure the repairs/mods contains repairs iaw part-21 (see later in doc)

Comment [AS3]: This is important. The EASA issuer of the Form 1 has to have the appropriate class rating. e.g. an undercarriage weld repair can be issued a Form 1 by a normal subpart-F shop – as they have a class rating for signing off the airworthiness of a drag brace – even though they can't do the weld repair.

In the case of avionics, the Form 1 would have to be issued by an avionics shop, and there may well be commercial reasons why they would not be keen

In the case of the subpart-F shop, they are mighty pleased to have a solution!

- 2.4.1. when the last maintenance was carried out and by whom;
- 2.4.2. if the component is unused, when the component was manufactured and by whom with a cross-reference to any original documentation which should be included with the Form;
- 2.4.3. a list of all airworthiness directives, repairs and modifications known to have been incorporated. If no airworthiness directives or repairs or modifications are known to be incorporated then this should be so stated;
- 2.4.4. detail of life used for service life-limited parts being any combination of fatigue, overhaul or storage life;
- 2.4.5. for any aircraft component having its own maintenance history record, reference to the particular maintenance history record as long as the record contains the details that would otherwise be required in block 13 12. The maintenance history record and acceptance test report or statement, if applicable, should be attached to the EASA Form 1.

Repair design data developed by U.S. organisations/persons for use on EU-Registered aircraft and related articles

1. Automatically approved data

All repair design data developed by US organisations/persons for use on an EU-Registered aircraft and related articles are approved by ED Decision 2004/04/CF, as amended by ED Decision 2007/001/CF, except for critical component repair design data developed by organisations/persons which are not the TC/STC holder.

Note: A critical component is defined as a part identified as critical by the design approval holder during the validation process, or otherwise by the exporting authority. Typically, such components include parts for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section or certification maintenance requirements of the manufacturer's maintenance manual or Instructions for Continued Airworthiness. Appendix 1 to EASA MIP Guidance Example Supplement

For each individual repair design, this EASA approval is based on:

- 1) Major repair data approved by FAA (as substantiated via an FAA letter or properly executed FAA Form 8110-3, 8100-9, or FAA Form 337)
- 2) Minor repair data submitted by the TC/STC holder or appliance design approval holder, or
- 3) Minor repair data determined to be acceptable data (under 14CFR part 43) as determined by a U.S. maintenance organisation under FAA's authorized system.

Limitations: Regarding the acceptable minor repair design data described in (3) above, an EASA Part 145 maintenance organisation located outside the US territory cannot declare that acceptable data under 14CFR43 may be used on an EU-registered aircraft unless that data has been previously used on a N-registered aircraft. Such data must be approved by EASA or under an EASA DOA for use by an EASA Part 145 maintenance organisation located outside the US territory.

Reference to the ED Decisions mentioned above shall be made in the release documents issued by the EASA 145 approved organisation; releasing the relevant EU registered aircraft or component to service.

Comment [AS4]: Note ALL US design data are approved for use on EU-reg aircraft

Except extreme critical components as defined by the TC/STC holder.

This is the required permission for the earlier Part-21 point