

**AMC & GM**

**ACCEPTABLE MEANS OF COMPLIANCE AND**

**GUIDANCE MATERIAL TO SIM-TO-LT-031**

**(FIN EMAR 145)**

AMC&GM  
ACCEPTABLE MEANS OF COMPLIANCE AND GUIDANCE MATERIAL TO  
SIM-To-Lt-031 (FIN EMAR 145)

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## **INTRODUCTION**

This instruction adheres to the applicable sections of EUROPEAN MILITARY AIRWORTHINESS REQUIREMENT EMAR 145 AMC & GM Edition no. 1.3, 12 Feb 2019 as published and approved by the Military Airworthiness Authorities (MAWA) Forum under the umbrella of the European Defence Agency (EDA).

## GENERAL

## SECTION A TECHNICAL REQUIREMENTS

### AMC 145.A.10 Scope

1.
  - a) Line Maintenance is defined in EMAD 1.
  - b) For temporary or occasional cases (Airworthiness Directives (ADs), SBs or national equivalent) the Quality Manager may accept base maintenance tasks to be performed by a line maintenance organisation provided all requirements are fulfilled as defined by the FIMAA.
  - c) Base Maintenance is defined in EMAD 1.
  - d) Aircraft maintained in accordance with 'progressive' type maintenance programmes should be individually assessed in relation to this paragraph. In principle, the decision to allow some 'progressive' checks to be carried out should be determined by the assessment that all tasks within the particular check can be carried out safely to the required standards at the designated line maintenance station.
2. NOT APPLICABLE.
3. NOT APPLICABLE.

### GM 145.A.10 Scope

NOT APPLICABLE

### AMC 145.A.15 Application

In a form and manner established by the FIMAA means that the application should be made by using an SVY902 (EMAR Form 2).

### AMC 145.A.20 Terms of approval

Table 1 in Annex 1 of SIM-To-Lt-031 identifies the S1000D Chapter Reference for the Category C component rating. If the maintenance manual (or equivalent document) does not follow the S1000D Chapter reference, the corresponding subjects still apply to the applicable C rating.

### AMC 145.A.25(a) Facility requirements

1. Where the hangar is not owned by the maintenance organisation, it may be necessary to establish proof of tenancy. In addition, sufficiency of hangar space to carry out planned base maintenance should be demonstrated by the preparation of a projected aircraft hangar visit plan relative to the maintenance programme. The aircraft hangar visit plan should be updated on a regular basis.
2. Protection from the weather elements relates to the normal prevailing local weather elements that are expected throughout any twelve-month period. Aircraft hangar and component workshop structures should pre-vent the ingress of rain, hail, ice, snow, wind and dust etc. as far as is militarily practicable. Aircraft hangar and component workshop floors should be sealed to minimise dust generation.
3. For line maintenance of aircraft, hangars are not essential but it is recommended that access to hangar accommodation be demonstrated for usage during inclement weather for minor scheduled work and lengthy defect rectification.
4. Aircraft maintenance staff should be provided with an area where they may study maintenance instructions and complete maintenance records in a proper manner.

### AMC 145.A.25(b) Facility requirements

It is acceptable to combine any or all of the office accommodation requirements into one office subject to the staff having sufficient room to carry out the assigned tasks.

In addition, as part of the office accommodation, aircraft maintenance staff should be provided with an area where they may study maintenance instructions and complete maintenance records in a proper manner.

### AMC 145.A.25(c) Facility requirements

Military operational needs should be taken into account when establishing a suitable working environment. However, as far as is practicable, the requirements should be adhered to.

### AMC 145.A.25(d) Facility requirements

1. Storage facilities for serviceable aircraft components should be clean, well ventilated and maintained at a constant dry temperature to minimise the effects of condensation. Manufacturer's storage recommendations should be followed for those aircraft components identified in such published recommendations. With regards to deployed military operations these requirements should be met as far as practicable.

2. Storage racks should be strong enough to hold aircraft components and provide sufficient support for large aircraft components such that the component is not distorted during storage.
3. All aircraft components, wherever practicable, should remain packaged in protective material to minimise damage and corrosion during storage.

### AMC 145.A.30(a) Personnel requirements

With regard to the Accountable Manager, it is normally intended to mean the Chief Executive Officer or senior military commander of the maintenance organisation, who by virtue of position has overall (including in particular resource allocation) responsibility for running the maintenance organisation. The Accountable Manager may be the Accountable Manager for more than one organisation and is not required to be necessarily knowledgeable on technical matters as the Maintenance Organisation Exposition (MOE) defines the maintenance standards. When the Accountable Manager is not the Chief Executive Officer or senior military commander, the FIMAA will need to be assured that such an Accountable Manager has direct access to the Chief Executive Officer or senior military commander and has a sufficiency of 'maintenance resources' allocation.

### AMC 145.A.30(b) Personnel requirements

1. Dependent upon the size of the maintenance organisation, the SIM-To-Lt-031 functions may be subdivided under individual managers or combined in any number of ways.
2. The maintenance organisation should have, dependent upon the extent of approval, a base maintenance manager, a line maintenance manager, a workshop manager and a quality manager, all of whom should report to the Accountable Manager.
3. The base maintenance manager is responsible for ensuring that all re-quired base maintenance, plus any defect rectification carried out during base maintenance, is carried out to the design and quality standards specified in SIM-To-Lt-031 145.A.65(b). The base maintenance manager is also responsible for any corrective action resulting from the quality compliance monitoring of SIM-To-Lt-031 145.A.65(c).
4. The line maintenance manager is responsible for ensuring that all line maintenance required to be carried out including line defect rectification is carried out to the standards specified in SIM-To-Lt-031 145.A.65(b) and also responsible for any corrective action resulting from the quality compliance monitoring of SIM-To-Lt-031 145.A.65(c).
5. The workshop manager is responsible for ensuring that all work on air-craft components is carried out to the standards specified in SIM-To-Lt-031 145.A.65(b) and also responsible for any corrective action resulting from the quality compliance monitoring of SIM-To-Lt-031 145.A.65(c).
6. The quality manager's responsibility is specified in SIM-To-Lt-031 145.A.30(c).

7. Notwithstanding the example subparagraphs 2 – 6 titles, the maintenance organisation may adopt any title for the foregoing managerial positions but should identify to the FIMAA the titles and persons chosen to carry out these functions.
8. Where a maintenance organisation chooses to appoint managers for all or any combination of the identified SIM-To-Lt-031 functions because of the size of the undertaking, it is necessary that these managers report ultimately through either the base maintenance manager or line maintenance manager or workshop manager or quality manager, as appropriate, to the Accountable Manager.

Note: Certifying staff may report to any of the managers specified depending upon which type of control the maintenance organisation uses (for example licensed engineers/independent inspection/dual function supervisors etc.) as long as the quality compliance monitoring staff specified in SIM-To-Lt-031 145.A.65(c)(1) remain independent.

### AMC 145.A.30(c) Personnel requirements

Monitoring the quality system includes requesting remedial action as necessary by the Accountable Manager and the nominated persons referred to in SIM-To-Lt-031 145.A.30(b).

### AMC 145.A.30(d) Personnel requirements

1. 'Sufficient' means that the maintenance organisation employs or contracts/tasks competent staff, as detailed in the man-hour plan, of which at least half the staff that perform maintenance in each workshop, hangar or flight line on any shift should be employed to ensure organisational stability. For the purpose of meeting a specific operational necessity, a temporary increase of the proportion of contracted staff may be permitted to the maintenance organisation by the FIMAA, in accordance with an approved procedure which should describe the extent, specific duties, and responsibilities for ensuring adequate organisation stability. For the purpose of this subparagraph, employed means the person is directly employed as an individual by the maintenance organisation whereas contracted/tasked means the person is employed by another organisation or military unit and contracted/tasked by that organisation to the maintenance organisation. In the case of MOD/Industrial partnered support arrangements, the MOD element of the maintenance organisation should be considered, for the purpose of this clause, as part of the industry workforce.
2. The maintenance man-hour plan should take into account all activities carried out outside the scope of the SIM-To-Lt-031 approval.  
  
The planned absence (for training, vacations, etc.) should be considered when developing the man-hour plan.
3. The maintenance man-hour plan should relate to the anticipated maintenance work load except that when the maintenance organisation cannot predict such workload, due to the short term nature of its

con-tracts/tasking or unpredictable variations in operational military tasking, then such a plan should be based upon the minimum maintenance workload needed for organisational viability. Maintenance work load includes all necessary work such as, but not limited to, planning, maintenance record checks, production of worksheets/cards in paper or electronic form, accomplishment of maintenance, inspection and the completion of maintenance records.

4. In the case of aircraft base maintenance, the maintenance man-hour plan should relate to the aircraft hangar visit plan as specified in AMC 145.A.25(a).
5. In the case of aircraft component maintenance, the maintenance man-hour plan should relate to the aircraft component planned maintenance as specified in SIM-To-Lt-031 145.A.25(a)(2).
6. The quality monitoring compliance function man-hours should be sufficient to meet the requirement of SIM-To-Lt-031 145.A.65(c) which means taking into account AMC 145.A.65(c). Where quality monitoring staff perform other functions, the time allocated to such functions needs to be taken into account in determining quality monitoring staff numbers.
7. The maintenance man-hour plan should be reviewed at least every 3 months and updated when necessary.
8. Significant deviation from the maintenance man-hour plan should be reported through the appropriate manager to the quality manager and the Accountable Manager for review. Significant deviation means more than a 25% shortfall in available man-hours during a calendar month for any one of the functions specified in SIM-To-Lt-031 145.A.30(d), or an inability to achieve military tasking due to personnel short-falls.

## AMC 1 145.A.30(e) Personnel requirements

Competence should be defined as a measurable skill or standard of performance, knowledge and understanding, taking into consideration attitude and behaviour.

The referenced procedure requires amongst others that planners, mechanics, specialised services staff, supervisors, certifying staff and support staff, whether employed or contracted, are assessed for competence before unsupervised work commences and competence is controlled on a continuous basis.

Competence should be assessed by evaluation of:

- on-the-job performance and/or testing of knowledge by appropriately qualified personnel; and
- records for basic, organisational, and/or product type and differences training; and
- experience records.

Validation of the above could include a confirmation check with the organisation(s) that issued such document(s). For that purpose, experience/training may be recorded in a document such as a log book or based on the suggested template in GM 3 145.A.30(e).

As a result of this assessment, an individual's qualification should determine:

- which level of ongoing supervision would be required or whether unsupervised work could be permitted.
- whether there is a need for additional training.

A record of the qualification and competence assessment should be kept.

This should include copies of all documents that attest to qualification, such as the AML (EASA or national), military Evidence of Qualification and/or any authorisation held, as applicable.

For a proper competence assessment of its personnel, the maintenance organisation should consider that:

1. In accordance with the job function, adequate initial and recurrent training should be provided and recorded to ensure continued competence so that it is maintained throughout the duration of employment/contract.
2. All staff should be able to demonstrate knowledge of and compliance with the maintenance organisation's procedures, as applicable to their duties.
3. All staff should be able to demonstrate an understanding of human factors and human performance issues in relation with their job function and be trained as per AMC 2 145.A.30(e).
4. To assist in the assessment of competence and to establish the training needs analysis, job descriptions are recommended for each job function in the maintenance organisation. Job descriptions should contain sufficient criteria to enable the required competence assessment.
5. Criteria should allow the assessment to establish that, among others (titles might be different in each organisation):
  - Managers are able to properly manage the work output, processes, resources and priorities described in their assigned duties and responsibilities in a safe compliant manner in accordance with requirements and maintenance organisation procedures.
  - Planners are able to interpret maintenance requirements into maintenance tasks, and have an understanding that they have no authority to deviate from the maintenance data.
  - Supervisors are able to ensure that all required maintenance tasks are carried out and, where not completed or where it is evident that a particular maintenance task cannot be carried out to the approved maintenance data, then such problems should be reported to the SIM-To-Lt-031 145.A.30(c) person for appropriate action. In addition, for those supervisors, who also carry out maintenance tasks, that they understand such tasks should not be undertaken when incompatible with their management responsibilities.
  - Mechanics are able to carry out maintenance tasks to any standard specified in the maintenance data and should notify supervisors of defects or mistakes requiring rectification to re-establish required maintenance standards.
  - Specialised services staff are able to carry out specialised maintenance tasks to the standard specified in the maintenance data. They should be able to communicate with supervisors and report accurately when necessary.

- Support staff are able to determine that relevant maintenance tasks have been carried out to the required standard.
- Certifying staff are able to determine when the aircraft or aircraft component is ready to release to service and when it should not be released to service.
- Quality audit staff are able to monitor compliance with SIM-To-Lt-031 identifying non-compliance in an effective and timely manner so that the Approved Maintenance Organisation (AMO) may remain in compliance with SIM-To-Lt-031.

Competence assessment should be based upon the procedure specified in GM 2 145.A.30(e).

### AMC 2 145.A.30(e) Personnel requirements

In respect to the understanding of the application of human factors and human performance issues, all maintenance organisation personnel should have received an initial and continuation human factors training. This should concern to a minimum:

- Nominated persons, managers, supervisors;
- Certifying staff, support staff and mechanics;
- Technical support personnel such as planners, engineers, technical record staff;
- Quality control/assurance staff;
- Specialised services staff;
- Human factors staff/ human factors trainers;
- Store department staff, purchasing department staff;
- Ground equipment operators;
- Contracted/tasked staff in the above categories.

1. Initial human factors training should cover all the topics of the training syllabus specified in GM 1 145.A.30(e) either as a dedicated course or else integrated within other training. The syllabus may be adjusted to reflect the particular nature of the maintenance organisation. The syllabus may also be adjusted to meet the particular nature of work for each function within the maintenance organisation. For example:

- small maintenance organisations not working in shifts may cover in less depth subjects related to teamwork and communication;
- planners may cover in more depth the scheduling and planning objective of the syllabus and in less depth the objective of developing skills for shift working.

All personnel, including personnel being recruited from any other organisation should receive initial human factors training compliant with the maintenance organisation's training standards prior to commencing actual job function, unless their competence assessment justifies that there is no need for such training. Newly directly employed personnel working under direct supervision may receive training within 6 months after joining the maintenance organisation.

2. The purpose of human factors continuation training is primarily to ensure that staff remain current in terms of human factors and also to collect feedback on human factors issues. Consideration should be given to the possibility that such training has the involvement of the quality department. There should be a procedure to ensure that feedback is formally passed from the trainers to the quality department to initiate action where necessary.

Human factors continuation training should be of an appropriate duration in each two year period in relation to relevant quality audit findings and other internal/external sources of information on human errors in maintenance available to the maintenance organisation.

3. Human factors training may be conducted by the maintenance organisation itself, or independent trainers, or any training organisations acceptable to the FIMAA.
4. The human factors training procedures should be specified in the MOE

### AMC 3 145.A.30(e) Personnel requirements

Additional training in fuel tank safety as well as associated inspection standards and maintenance procedures should be required for maintenance organisations' technical personnel, especially technical personnel involved in the compliance of Critical Design Configuration Control Limitations (CDCCL) tasks (if applicable).

Guidance is provided for training to maintenance organisation personnel in Appendix IV to AMC 145.A.30(e).

### AMC 4 145.A.30(e) Personnel requirements

Competence assessment should include the verification for the need of additional EWIS training when relevant.

(Note: EASA guidance for an EWIS training programme to maintenance organisation personnel can be found in EASA AMC 20-22.)

## GM 1 145.A.30(e) Personnel requirements (Training syllabus for initial human factors training)

The training syllabus below identifies the topics and subtopics to be addressed during the human factors training.

The maintenance organisation may combine, divide, change the order of any subject of the syllabus to suit its own needs, as long as all subjects are covered to a level of detail appropriate to the maintenance organisation and its personnel.

Some of the topics may be covered in separate training (health and safety, management, supervisory skills, etc.) in which case duplication of training is not necessary.

Where possible, practical illustrations and examples should be used, especially accident and incident reports.

Topics should be related to existing legislation, where relevant. Topics should be related to existing guidance/advisory material, where relevant (e.g. ICAO Human Factors (HF) Digests and Training Manual and appropriate military training).

Topics should be related to maintenance engineering where possible; too much unrelated theory should be avoided.

1. General/Introduction to human factors
  - 1.1. The need to take human factors into account;
  - 1.2. Statistics;
  - 1.3. Incidents attributable to human factors/human error;
  - 1.4. "Murphy's Law".
2. Safety Culture/Organisational factors
  - 2.1. "Culture" issues.
3. Human errors
  - 3.1. Error models and theories;
  - 3.2. Types of errors in maintenance tasks;
  - 3.3. Violations;
  - 3.4. Implications of errors (i.e. accidents);
  - 3.5. Avoiding and managing errors;
  - 3.6. Human reliability.
4. Human performance & limitations
  - 4.1. Vision;

- 4.2. Hearing;
  - 4.3. Information-processing;
  - 4.4. Attention and perception;
  - 4.5. Situational awareness;
  - 4.6. Memory;
  - 4.7. Claustrophobia and physical access;
  - 4.8. Motivation and de-motivation;
  - 4.9. Fitness/Health;
  - 4.10. Stress: domestic and work related;
  - 4.11. Workload management (overload and underload);
  - 4.12. Sleep and fatigue;
  - 4.13. Alcohol, medication, drug abuse;
  - 4.14. Physical work;
  - 4.15. Repetitive tasks/complacency.
5. Environment
- 5.1. Peer pressure;
  - 5.2. Stressors;
  - 5.3. Time pressure and deadlines;
  - 5.4. Workload;
  - 5.5. Shift Work;
  - 5.6. Noise and fumes;
  - 5.7. Illumination;
  - 5.8. Climate and temperature;
  - 5.9. Motion and vibration;
  - 5.10. Complex systems;
  - 5.11. Hazards in the workplace, recognising and avoiding hazards, dealing with emergencies;
  - 5.12. Lack of manpower;
  - 5.13. Distractions and interruptions;
  - 5.14. Military environment and other military factors/Operational pressures.

6. Procedures, information, tools and practices
  - 6.1. Visual Inspection;
  - 6.2. Work logging and recording;
  - 6.3. Procedure — practice/mismatch/norms;
  - 6.4. Technical documentation — access and quality.
7. Communication
  - 7.1. Shift/Task handover;
  - 7.2. Dissemination of information;
  - 7.3. Cultural differences;
  - 7.4. Within and between teams.
8. Teamwork
  - 8.1. Responsibility: individual and group;
  - 8.2. Management, supervision and leadership;
  - 8.3. Decision making.
9. Professionalism and integrity
  - 9.1. Keeping up to date; currency;
  - 9.2. Error provoking behaviour;
  - 9.3. Assertiveness.
10. Maintenance organisation's HF program
  - 10.1. Reporting errors;
  - 10.2. Disciplinary policy;
  - 10.3. Error investigation;
  - 10.4. Action to address problems;
  - 10.5. Feedback.

## GM 2 145.A.30(e) – Competence assessment procedure

The maintenance organisation should develop a procedure describing the process of competence assessment of personnel. The procedure should specify:

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- persons responsible for this process,
- when the assessment should take place,
- credits from previous assessments,
- validation of qualification records,
- means and methods for the initial assessment,
- means and methods for the continuous control of competence including feedback on personnel performance,
- competences to be observed during the assessment in relation with each job function,
- actions to be taken when assessment is not satisfactory,
- recording of assessment results.

For example, according to the job functions and the scope, size and complexity of the maintenance organisation, the assessment may consider the following (the table is not exhaustive):

	Managers	Planners	Supervisor	Certifying staff and support staff	Mechanics	Specialised Service staff	Quality audit staff
Knowledge of applicable officially recognised standards						X	X
Knowledge of auditing techniques: planning, conducting and reporting							X
Knowledge of human factors, human performance and limitations	X	X	X	X	X	X	X
Knowledge of logistics processes	X	X	X				
Knowledge of maintenance organisation capabilities, privileges and limitations	X	X	X	X		X	X
Knowledge of SIM-To-Lt-036, SIM-To-Lt-031 and any other relevant regulations	X	X	X	X			X
Knowledge of relevant parts of the MOE and procedures	X	X	X	X	X	X	X

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	Managers	Planners	Supervisor	Certifying staff and support staff	Mechanics	Specialised Service staff	Quality audit staff
Knowledge of occurrence reporting system and understanding of the importance of reporting occurrences, incorrect maintenance data and existing or potential defects		X	X	X	X	X	
Knowledge of safety risks linked to the working environment	X	X	X	X	X	X	X
Knowledge on CDCCL when relevant	X	X	X	X	X	X	X
Knowledge on EWIS when relevant	X	X	X	X	X	X	X
Understanding of professional integrity, behaviour and attitude towards safety	X	X	X	X	X	X	X
Understanding of conditions for ensuring continuing airworthiness of aircraft and components				X			X
Understanding of his/her own human performance and limitations	X	X	X	X	X	X	X
Understanding of personnel authorisations and limitations	X	X	X	X	X	X	X
Understanding critical task		X	X	X	X		X
Ability to compile and control completed work cards		X	X	X			
Ability to consider human performance and limitations.	X	X	X	X			X
Ability to determine required qualifications for task performance		X	X	X			
Ability to identify and rectify existing and potential unsafe conditions			X	X	X	X	X
Ability to manage third parties involved in maintenance activity		X	X				
Ability to confirm proper accomplishment of maintenance tasks			X	X	X	X	
Ability to identify and properly plan performance of critical task		X	X	X			

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	Managers	Planners	Supervisor	Certifying staff and support staff	Mechanics	Specialised Service staff	Quality audit staff
Ability to prioritise tasks and report discrepancies		X	X	X	X		
Ability to process the work requested by the operator		X	X	X			
Ability to promote the safety and quality policy	X		X				
Ability to properly process removed, uninstalled and rejected parts			X	X	X	X	
Ability to properly record and sign for work accomplished			X	X	X	X	
Ability to recognise the acceptability of parts to be installed prior to fitment				X	X		
Ability to split complex maintenance tasks into clear stages		X					
Ability to understand work orders, work cards and refer to and use applicable maintenance data		X	X	X	X	X	X
Ability to use information systems	X	X	X	X	X	X	X
Ability to use, control and be familiar with required tooling and/or equipment			X	X	X	X	
Adequate communication and literacy skills	X	X	X	X	X	X	X
Analytical and proven auditing skills (for example, objectivity, fairness, open-mindedness, determination, ...)							X
Maintenance error investigation skills							X
Resources management and production planning skills	X	X	X				
Teamwork, decision-making and leadership skills	X		X				

## GM 3 145.A.30(e) – Template for recording experience/training

The following template may be used to record the professional experience gained in a maintenance organisation and the training received and be considered during the competence assessment of the individual in another maintenance organisation.

<b>Aviation Maintenance personnel experience credential</b>		
Name	Given name	
Address		
Telephone	E-mail	
Independent worker <input type="checkbox"/>		
Trade Group: airframe <input type="checkbox"/> engine <input type="checkbox"/> electric <input type="checkbox"/> avionics <input type="checkbox"/> other (specify) <input type="checkbox"/> .....		
<b>Employer's details (when applicable)</b>		
Name		
Address		
Telephone		
<b>Maintenance organisation details</b>		
Name		
Address		
Telephone		
Approval Number		
Period of employment	From:	To:
<b>Domain of employment</b>		
<input type="checkbox"/> Planning	<input type="checkbox"/> Engineering	<input type="checkbox"/> Technical records
<input type="checkbox"/> Store department	<input type="checkbox"/> Purchasing	
<b>Mechanics/Technician</b>		
<input type="checkbox"/> Line Maintenance	<input type="checkbox"/> Base Maintenance	<input type="checkbox"/> Component Maintenance
<input type="checkbox"/> Servicing	<input type="checkbox"/> Removal/Installation	<input type="checkbox"/> Testing/inspection
<input type="checkbox"/> Scheduled Maintenance	<input type="checkbox"/> Inspection	<input type="checkbox"/> Repair
<input type="checkbox"/> Trouble-shooting	<input type="checkbox"/> Trouble-shooting	<input type="checkbox"/> Overhaul
	<input type="checkbox"/> Repair	<input type="checkbox"/> Re-treatment
		<input type="checkbox"/> Reassembly



Certified by:

Name:

Date:

Position:

Signature:

Contact details:

*Advisory note: A copy of the present credential should be kept for at least 3 years from its issuance by the maintenance organisation.*

## AMC 145.A.30(f) Personnel requirements

1. NOT APPLICABLE.
2. Appropriately qualified means to levels of qualification and certification as defined by the European Standard EN 4179 (or national equivalent qualification) dependent upon the non-destructive testing function to be carried out.
3. Notwithstanding the fact that Level 3 personnel (or national equivalent qualification) may be qualified via EN 4179 to establish and authorise methods, techniques, etc., this does not permit such personnel to deviate from methods and techniques published by the (Military) Type Certificate Holder/manufacturer or FIMAA in the form of continued airworthiness data, such as in non-destructive test manuals or Service Bulletins, unless the manual or Service Bulletin expressly permits such deviation.
4. Notwithstanding the general references in EN 4179 to a national aero-space non-destructive testing (NDT) board, all examinations should be conducted by personnel or organisations under the general control of such a board or as specified by the FIMAA. In the absence of a national aerospace NDT board, the aerospace NDT board of another pMS should be used, as defined by the FIMAA.
5. Moved to GM 145.A.30(f) Personnel requirements.
6. It should be noted that new methods are being and will be developed, which are not specifically addressed by EN 4179. Until the time this agreed standard is established, such methods should be carried out in accordance with the particular equipment manufacturer's recommendations including any training and examination process to ensure competence of the personnel in the process.
7. Any maintenance organisation that carries out NDT should establish NDT specialist qualification procedures detailed in the MOE and accepted by the FIMAA.
8. Boroscopy and other techniques such as manual tap testing are non-destructive inspections rather than non-destructive testing. Notwithstanding such differentiation, the maintenance organisation should establish an MOE procedure accepted by the FIMAA to ensure that personnel who carry out and interpret such inspections are properly trained and assessed for their competence in the process. Non-destructive

inspections, not being considered as NDT by SIM-To-Lt-031 are not listed in SIM-To-Lt-031 Appendix 1 under class rating D1.

9. The referenced standards, methods, training and procedures should be specified in the MOE.
10. Any such personnel who intend to carry out and/or control a non-destructive test for which they were not qualified prior to the effective date of SIM-To-Lt-031 should qualify for such non-destructive test in accordance with EN 4179 (or national equivalent qualification).
11. In this context officially recognised standard means those standards established or published by an official body whether having legal personality or not, which are widely recognised by the aerospace sector as constituting good practice, or those accepted by the FIMAA.

### GM 145.A.30(f) Personnel requirements

Particular non-destructive test means any one or more of the following; Penetrant Test-ing (PT), Magnetic Testing (MT), Eddy current Testing (ET), Ultrasonic Testing (UT), Radiographic Testing (RT), Thermographic Testing (TT) and Shearographic Testing (ST) methods.

### AMC 145.A.30(g) Personnel requirements

1. For the purposes of SIM-He-Lt-030 66.A.20(a)(1) and SIM-He-Lt-030 66.A.20(a)(3)(ii) personnel, minor scheduled line maintenance means any minor scheduled inspection/check up to and including a weekly check specified in the Aircraft Maintenance Programme (AMP). For AMPs that do not specify a weekly check, the FIMAA should determine the most significant check that is considered equivalent to a weekly check.
2. Typical tasks permitted after appropriate task training to be carried out by the SIM-He-Lt-030 66.A.20(a)(1) and the SIM-He-Lt-030 66.A.20(a)(3)(ii) personnel for the purpose of these personnel issuing an aircraft Certificate of Release to Service (CRS) as specified in SIM-To-Lt-031 145.A.50 as part of minor scheduled line maintenance or simple defect rectification are contained in the following list:
  - a) Replacement of wheel assemblies.
  - b) Replacement of wheel brake units.
  - c) Replacement of emergency equipment.
  - d) Replacement of ovens, boilers and beverage makers.
  - e) Replacement of internal and external lights, filaments and flash tubes.
  - f) Replacement of windscreen wiper blades.
  - g) Replacement of passenger and cabin crew seats, seat belts and harnesses.

- h) Closing of cowlings and refitment of quick access inspection panels.
- i) Replacement of toilet system components but excluding gate valves.
- j) Simple repairs and replacement of internal compartment doors and placards but excluding doors forming part of a pressure structure.
- k) Simple repairs and replacement of overhead storage compartment doors and cabin furnishing items.
- l) Replacement of static wicks.
- m) Replacement of aircraft main and APU aircraft batteries.
- n) NOT APPLICABLE.
- o) Routine lubrication and replenishment of all system fluids and gases.
- p) The de-activation only of subsystems and aircraft components as permitted by the Operating Organisation's Minimum Equipment List (MEL) where relevant or national equivalent procedure, where such de-activation is agreed by the FIMAA as a simple task.
- q) Inspection for and removal of de-icing/anti-icing fluid residues, including removal/closure of panels, cowls or covers or the use of special tools.
- r) Removal and installation of simple internal medical equipment.
- s) Any other task agreed by the FIMAA as a simple task for a particular aircraft type. This may include defect deferment when all the following conditions are met:
  - There is no need for troubleshooting; and
  - The task is in the MEL; and
  - The maintenance action required by the MEL is agreed by the FIMAA to be simple.

In the particular case of helicopters, and in addition to the items above, the following:

- t) Removal and installation of external cargo provisions (i.e. external hook, mirrors) other than the hoist.
- u) Removal and installation of quick release external cameras and search lights.
- v) Removal and installation of emergency float bags, not including the bottles.
- w) Removal and installation of external doors fitted with quick release attachments.
- x) Removal and installation of snow pads/skid wear shoes/slump protection pads.

Any task on a military specific system agreed by the FIMAA as a simple task for a particular aircraft type.

No task which requires troubleshooting should be part of the authorised maintenance actions. Release to service after rectification of deferred defects should be permitted as long as the task is listed above.

3. The requirement of having appropriate aircraft rated certifying staff qualified as Category B1 or B2 as appropriate, in the case of aircraft line maintenance does not imply that the maintenance organisation

must have B1 or B2 personnel at every line station. The MOE should have a procedure on how to deal with defects requiring B1 or B2 certifying staff.

4. The FIMAA may accept that in the case of aircraft line maintenance a maintenance organisation has only B1 or B2 certifying staff, as appropriate, provided that the FIMAA is satisfied that the scope of work, as de-fined in the MOE, does not need the availability of all B1 or B2 certifying staff. Special attention should be taken to clearly limit the scope of scheduled and non-scheduled line maintenance (defect rectification) to only those tasks that can be certified by the available certifying staff Category.

### AMC 145.A.30(h) Personnel requirements

In accordance with SIM-To-Lt-031 145.A.30(h) and SIM-To-Lt-031 145.A.35, the qualification requirements (Evidence of qualification, Military Aircraft Type Ratings, recent experience and continuation training) are identical for certifying staff and for support staff. The only difference is that support staff cannot hold certification privileges when performing this role since during base maintenance the release to service will be issued by Category C certifying staff. Nevertheless, the maintenance organisation may use as support staff (for base maintenance) persons who already hold certification privileges for line maintenance.

### AMC 145.A.30(j)(4) Personnel requirements

1. For the issue of a limited certification authorisation the aircraft commander or flight engineer should hold either a valid pilot or flight engineer licence/national military qualification (or civilian equivalent) acceptable to the FIMAA on the aircraft type. In addition, the limited certification authorisation is subject to the MOE containing procedures to address the personnel requirements of SIM-To-Lt-031 145.A.30(e) and associated AMC and GM. Such procedures should include as a minimum:
  - a) Completion of adequate national military airworthiness regulations training; and
  - b) Completion of adequate task training for the specific task on the aircraft. The task training should be of sufficient duration to ensure that the individual has a thorough understanding of the task to be completed and should involve training in the use of associated maintenance data; and
  - c) Completion of the procedural training as specified in SIM-To-Lt-031.

The above procedures should be specified in the MOE and be accepted by the FIMAA.

2. (i) Typical tasks that may be certified and/or carried out by the aircraft commander holding a valid licence/national military pilot qualification (or civilian equivalent) acceptable to the FIMAA on the aircraft type are minor maintenance or simple checks included in the following list:
  - a) Replacement of internal lights, filaments and flash tubes.
  - b) Closing of cowlings and refitment of quick access inspection panels.

- c) Simple configuration changes (e.g. stretcher fit, FLIR, doors, photographic equipment etc.)
  - d) Inspection for and removal of de-icing/anti-icing fluid residues, including removal/closure of panels, cowls or covers that are easily accessible but not re-quiring the use of special tools.
  - e) Any check/replacement involving simple techniques consistent with this AMC and as agreed by the FIMAA.
2. (ii) Holders of a valid national military flight engineer licence/qualification, or equivalent, acceptable to the FIMAA, on the aircraft type may only exercise this limited certification authorisation privilege when performing the du-ties of a flight engineer.

In addition to paragraph 2(i)(a) to (e), other typical minor maintenance or simple defect rectification tasks that may be carried out are included in the following list:

- a) Replacement of wheel assemblies.
  - b) Replacement of simple emergency equipment that is easily accessible.
  - c) Replacement of ovens, boilers and beverage makers.
  - d) Replacement of external lights.
  - e) Replacement of passenger and cabin crew seats, seat belts and harnesses.
  - f) Simple replacement of overhead storage compartment doors and cabin furnishing items.
  - g) Replacement of static wicks.
  - h) Replacement of aircraft main and APU aircraft batteries.
  - i) NOT APPLICABLE.
  - j) The de-activation only of subsystems and aircraft components as permitted by the Operating Organisation's MEL where relevant or a national equivalent procedure, where such de-activation is agreed by the FIMAA as a simple task.
  - k) Re-setting of tripped circuit breakers under the guidance of maintenance control.
  - l) Any other task agreed by the FIMAA as a simple task for a particular aircraft type.
3. The authorisation should have a finite life of twelve months subject to satisfactory re-current training on the applicable aircraft type.

## GM 145.A.30(j)(4) Personnel requirements (Flight crew)

For military aircrew, the theoretical knowledge is covered throughout flying training and, for specific aircraft types, during operational conversion training for the relevant aircraft type. Thereafter, the individual's level of knowledge is monitored by the pMS' aircrew standards organisation for that specific type.

### AMC 145.A.30(j)(5) Personnel requirements

1. For the purposes of this subparagraph “unforeseen” means that the air-craft grounding could not reasonably have been predicted by the Operating Organisation because the defect was unexpected due to being part of a hitherto reliable system.
2. A one-off authorisation should only be considered for issue by the maintenance organisation after it has made a reasoned judgement that such a requirement is appropriate under the circumstances and at the same time maintaining the required airworthiness standards. The maintenance organisation should assess each situation individually prior to the issuance of a one-off authorisation. The maintenance organisation that issues this one-off authorisation retains responsibility for all work performed.
3. A one-off authorisation should not be issued where the level of certification required could exceed the knowledge and experience level of the person it is issued to. In all cases, due consideration should be given to the complexity of the work involved and the availability of required tooling and/or test equipment needed to complete the work.

### AMC 145.A.30(j)(5)(i) Personnel requirements

In those situations where the requirement for a one-off authorisation to issue a CRS for a task on an aircraft type for which certifying staff does not hold a type-rated authorisation has been identified, the following procedure is recommended:

1. Flight crew should communicate full details of the defect to their maintenance organisation. If necessary, the maintenance organisation should consider the issue of a one-off authorisation.
2. When issuing a one-off authorisation, the maintenance organisation should verify that:
  - a) Full technical details relating to the work required to be carried out have been established and passed on to the certifying staff; and
  - b) The maintenance organisation has an approved procedure in place for coordinating and controlling the total maintenance activity undertaken at the location under the authority of the one-off authorisation; and
  - c) The person to whom a one-off authorisation is issued has been provided with all the necessary information and guidance relating to maintenance data and any special technical instructions associated with the specific task undertaken. A detailed step by step worksheet has been defined by the maintenance organisation, communicated to the one-off authorisation holder; and
  - d) The person holds authorisations of equivalent level and scope on other aircraft type of similar technology, construction and systems.
3. The one-off authorisation holder should sign-off the detailed step by step worksheet when completing the work steps. The completed tasks should be verified by visual examination and/or normal system operation upon return to an appropriately approved SIM-To-Lt-031 (or equivalent) maintenance facility.

## AMC 145.A.30(j)(5)(ii) Personnel requirements

This paragraph addresses staff not employed by the maintenance organisation who meet the requirements of SIM-To-Lt-031 145.A.30(j)(5). In addition to the items listed in AMC 145.A.30(j)(5)(i), paragraph 1, 2(a), (b) and (c) and 3 the maintenance organisation may issue such a one-off authorisation subject to full qualification details relating to the proposed certifying personnel being verified by the maintenance organisation and made available at the location.

## AMC 145.A.35(a) Certifying staff and support staff

1. Holding an Evidence of Qualification with the relevant Military Aircraft Type/Group Rating, or a national qualification in the case of components, does not mean by itself that the holder is qualified to be authorised as certifying staff and/or support staff. The maintenance organisation is responsible to assess the competence of the holder for the scope of maintenance to be authorised.
2. The sentence “the maintenance organisation shall ensure that certifying staff and support staff have an adequate understanding of the relevant aircraft and/or components to be maintained together with the associated maintenance organisation procedures” means that the person has received training and has been successfully assessed on:
  - the type of aircraft or component;
  - the differences on:
    - the particular model/variant;
    - the particular configuration.

The maintenance organisation should specifically ensure that the individual competencies have been established with regard to:

- relevant knowledge, skills and experience in the product type and configuration to be maintained, taking into account the differences between the generic Military Aircraft Type Rating training that the person received and the specific configuration of the aircraft to be maintained;
  - appropriate attitude towards safety and observance of procedures;
  - knowledge of the associated maintenance organisation and Operating Organisation procedures (i.e. handling and identification of components, MEL use, Aircraft Technical Log use, independent checks, etc.).
3. Some special maintenance tasks may require additional specific training and experience, including but not limited to:
    - in-depth troubleshooting;

- very specific adjustment or test procedures;
- rigging;
- engine run-up, starting and operating the engines, checking engine performance characteristics, normal and emergency engine operation, associated safety precautions and procedures;
- extensive structural/system inspection and repair;
- other specialised maintenance required by the AMP.

For engine run-up training, simulators and/or real aircraft should be used.

4. The satisfactory assessment of the competence should be conducted in accordance with a procedure approved by the FIMAA (item 3.4 of the MOE, as described in AMC 145.A.70(a)).
5. The maintenance organisation should hold copies of all documents that attest the competence and recent experience for the period described in SIM-To-Lt-031 145.A.35(j).

Additional information is provided in AMC 66.A.20(b)3.

### AMC 145.A.35(b) Certifying staff and support staff

Moved to SIM-To-Lt-031 145.A.35(b).

### AMC 1 145.A.35(c) Certifying staff and support staff

For the interpretation of “6 months of actual relevant aircraft maintenance experience in any consecutive 2-year period”, the provisions of AMC 66.A.20(b)2 are applicable.

### AMC 2 145.A.35(c) Certifying staff and support staff

Where unpredictable variations in operational military tasking require the use of personnel not meeting the six-month experience requirement, this should be approved by the Accountable Manager on a temporary basis only with the necessary precaution/mitigation put in place and both the Operating Organisation/CAMO for which work is being conducted and the FIMAA should be informed.

## AMC 145.A.35(d) Certifying staff and support staff

1. Continuation training is a two way process to ensure that certifying staff and support staff remain current in terms of procedures, human factors and technical knowledge and that the maintenance organisation receives feedback on the adequacy of its procedures and maintenance instructions. Due to the interactive nature of this training, the maintenance organisation should consider the involvement of the quality department to ensure that feedback is actioned. Alternatively, there should be a procedure to ensure that feedback is formally passed from the training department to the quality department to initiate action.
2. Continuation training should cover changes in relevant requirements such as SIM-To-Lt-031, changes in maintenance organisation procedures and the modification standard of the products being maintained plus human factor issues identified from any internal or external analysis of incidents. It should also address instances where staff failed to follow procedures and the reasons why particular procedures are not always followed. In many cases the continuation training should reinforce the need to follow procedures and ensure that incomplete or incorrect procedures are identified to the maintenance organisation in order that they can be corrected. This does not preclude the possible need to carry out a quality audit of such procedures.
3. Continuation training should be of sufficient duration in each 2-year period to meet the intent of SIM-To-Lt-031 145.A.35(d) and may be split into a number of separate elements. SIM-To-Lt-031 145.A.35(d) requires such training to keep certifying staff and support staff updated in terms of relevant technology, procedures and human factors issues which means it is one part of ensuring quality. Therefore, sufficient duration should be related to relevant quality audit findings and other internal/external sources of information available to the maintenance organisation on human errors in maintenance. This means that in the case of a maintenance organisation that maintains aircraft with few relevant quality audit findings, continuation training could be limited to days rather than weeks, whereas a similar maintenance organisation with a number of relevant quality audit findings, such training may take several weeks. For an maintenance organisation that maintains aircraft components, the duration of continuation training would follow the same philosophy but should be scaled down to reflect the more limited nature of the activity. For example certifying staff who release hydraulic pumps may only require a few hours of continuation training whereas those who release turbine engines may require a few days of such training. The content of continuation training should be related to relevant quality audit findings and it is recommended that such training is reviewed at least once in every 24 month period.
4. The method of training is intended to be a flexible process and could, for example, include an EASA/EMAR 147 compliance continuation training course, aeronautical college courses, internal short duration courses, seminars, etc. The elements, general content and length of such training should be specified in the MOE unless such training is undertaken by an SIM-To-Lt-029 (or equivalent) Maintenance Training Organisation (MTO) when such details may be specified under the approval and cross referenced in the MOE.

### AMC 145.A.35(e) Certifying staff and support staff

The programme for continuation training should list all certifying staff and support staff and when training will take place, the elements of such training and an indication that it was carried out reasonably on time as planned. Such information should subsequently be transferred to the certifying staff and support staff record as required by SIM-To-Lt-031 145.A.35(j).

### AMC 145.A.35(f) Certifying staff and support staff

As stated in SIM-To-Lt-031 145.A.35(f), except where any of the unforeseen cases of SIM-To-Lt-031 145.A.30(j)(5) applies, all prospective certifying staff and support staff should be assessed for competence related to their intended duties in accordance with AMCs 1, 2, 3 and 4 to SIM-To-Lt-031 145.A.30(e), as applicable.

### AMC 145.A.35(j) Certifying staff and support staff

1. The following minimum information as applicable should be kept on record in respect of each certifying staff and support staff:
  - a) Name
  - b) Rank/Grade and Service Number (if applicable)
  - c) Date of Birth
  - d) Basic Training
  - e) Military Aircraft Type Training/Task Training
  - f) Continuation Training
  - g) Experience
  - h) Qualifications relevant to the authorisation
  - i) Scope of the authorisation
  - j) Date of first issue of the authorisation
  - k) If appropriate – expiry date of the authorisation
  - l) Identification Number of the authorisation
  - m) Security clearance (where applicable).
2. The record may be kept in any format and should be controlled by the maintenance organisation.

3. Persons authorised to access the system should be maintained at a minimum to ensure that records cannot be altered in an unauthorised manner or that such confidential records become accessible to unauthorised persons.
4. The FIMAA or qualified entity acting on behalf of the FIMAA is to be considered as an 'authorised person' when investigating the records system for initial and continued approval or when the FIMAA has cause to doubt the competence of a particular person.

### AMC 145.A.35(n) Certifying staff and support staff

1. It is the responsibility of the AMO issuing the Category A certifying staff authorisation to ensure that the task training received by this person covers all the tasks to be authorised. This is particularly important in those cases where the task training has been provided by an SIM-To-Lt-029 (or equivalent) MTO or by an AMO different from the one issuing the authorisation.
2. "Appropriately approved in accordance with SIM-To-Lt-029" means an MTO holding an approval to provide Category A task training for the corresponding aircraft type.
3. "Appropriately approved in accordance with SIM-To-Lt-031" means an AMO holding a maintenance organisation approval for the corresponding aircraft type.

### AMC 145.A.35(o) Certifying staff and support staff

1. The privilege for a Category B2 Evidence of Qualification holder to re-lease minor scheduled line maintenance and simple defect rectification in accordance with SIM-He-Lt-030 66.A.20(a)(3)(ii) can only be granted by the AMO where the Evidence of Qualification holder is employed/contracted after meeting all the requirements specified in SIM-To-Lt-031 145.A.35(o). This privilege cannot be transferred to another maintenance organisation.
2. When a Category B2 Evidence of Qualification holder already holds a certifying staff authorisation containing minor scheduled line maintenance and simple defect rectification for a particular aircraft type, new tasks relevant to Category A can be added to that type without requiring another 6 months of experience. However, task training (theoretical plus practical hands-on) and examination/assessment for these additional tasks is still required.
3. When the certifying staff authorisation intends to cover several aircraft types, the experience may be combined within a single 6-month period.

For the addition of new aircraft types to the certifying staff authorisation, another 6 months should be required unless the aircraft is considered similar per AMC 66.A.20(b)2 to the one already held.

4. The term “6 months of experience” can include either full-time employment or part-time employment. The important aspect is that the person has been involved during a period of 6 months (not necessarily every day) in those tasks which are going to be part of the authorisation.

### GM 145.A.35(o) Certifying staff and support staff

‘Unless approved otherwise by the FIMAA in this context means that the requirement can be waived by the FIMAA in the case of military personnel that already hold this privilege when they are posted from one AMO to another.

### AMC 145.A.40(a) Equipment, tools and material

Once the applicant for approval has determined the intended scope of approval for consideration by the FIMAA, it should be necessary to show that all tools and equipment as specified in the maintenance data can be made available when needed. All such tools and equipment that require to be controlled in terms of servicing or calibration by virtue of being necessary to measure specified dimensions and torque figures etc, should be clearly identified and listed in a control register including any personal tools and equipment that the maintenance organisation agrees can be used.

### AMC 145.A.40(b) Equipment, tools and material

1. The control of these tools and equipment requires that the maintenance organisation has a procedure to inspect/service and, where appropriate, calibrate such items on a regular basis and indicate to users that the item is within any inspection or service or calibration time-limit. A clear system of labelling all tooling, equipment and test equipment is therefore necessary giving information on when the next inspection or service or calibration is due and if the item is unserviceable for any other reason where it may not be obvious. A register should be maintained for all precision tooling and equipment together with a record of calibrations and standards used.
2. Inspection, service or calibration on a regular basis should be in accordance with the equipment manufacturers’ instructions unless approved otherwise by the FIMAA.
3. In this context officially recognised standard means those standards established or published by an official body whether having legal personality or not, which are widely recognised by the aerospace sector as constituting good practice, or those accepted by the FIMAA.

## AMC 145.A.42(a) Acceptance of components

1. A document equivalent to an EMAR Form1 (SVY901) may be:

- a) NOT APPLICABLE.
- b) NOT APPLICABLE.
- c) NOT APPLICABLE.
- d) NOT APPLICABLE.
- e) NOT APPLICABLE.
- f) An EASA Form 1 (Not originating from an EASA Part M Subpart F approved organisation) or equivalent.

A document equivalent to an EASA Form 1 may be:

- a) a release document issued by an organisation under the terms of a bilateral agreement signed by the European Union;
- b) a release document issued by an organisation approved under the terms of a JAA bilateral agreement until superseded by the corresponding agreement signed by the European Union;
- c) a JAA Form One issued prior to 28 November 2004 by a JAR 145 organisation approved by a JAA Full Member State;
- d) in the case of new aircraft components that were re-leased from manufacturing prior to the Part 21 compliance date, the component should be accompanied by a JAA Form One issued by a JAR 21 organisation approved by a JAA Full Member State and within the JAA mutual recognition system;
- e) a JAA Form One issued prior to 28 September 2005 by a production organisation approved by a competent authority in accordance with its national regulations.
- f) a 'declaration of maintenance accomplished' issued by the person or organisation that performed the maintenance, as specified in point EASA M.A.502(e) or in point EASA ML.A.502(c).
- g) A national equivalent document recognized by the FIMAA as declaring an item's serviceability and airworthiness.
- h) A release document issued by an organisation accepted by the FIMAA.

2. See AMC 145.A.42(a)4 and AMC 145.A.42(a)5.

## GM 145.A.42(a) Acceptance of components

NOT APPLICABLE

## AMC 145.A.42(a)2 Acceptance of components

The maintenance organisation performing maintenance should ensure proper identification of any unserviceable components.

The unserviceable status of the component should be clearly declared on a tag or other suitable means together with the component identification data and any information useful to define actions necessary to be taken. Such information should state, as applicable, in-service times, maintenance status, preservation status, failures, defects or mal-functions reported or detected, exposure to adverse environmental conditions or if the component has been involved in or affected by an accident/incident. Means should be provided to prevent unwanted separation of this tag from the component.

## AMC 145.A.42(a)3 Acceptance of components

A maintenance organisation may choose, in consultation with the CAMO/Operating Organisation, to release an unsalvageable component for legitimate non-flight uses, such as for training and education, research and development. In such instances, mutilation may not be appropriate. The following methods should be used to prevent the component re-entering the aviation supply system:

- a) permanently marking or stamping the component, as “NOT SERVICEABLE.” (ink stamping is not an acceptable method);
- b) removing original part number identification;
- c) removing data plate identification;
- d) maintaining a tracking or accountability system, by serial number or other individualised data, to record transferred unsalvageable aircraft component;
- e) including written procedures concerning disposal of such components in any agreement or contract transferring such components.

NOTE: Unsalvageable components should not be released to any person or organisation that is known to return unsalvageable components back into the aviation supply system, due to the potential safety threat. Information about such organisations can be found, for example, in FAA Unapproved Parts Notifications, FAA Special Airworthiness Bulletins or EASA Safety Information Bulletins.

## AMC 145.A.42(a)3(ii) Acceptance of components

1. Mutilation should be accomplished in such a manner that the components become permanently unusable for their original intended use. Mutilated components should not be able to be reworked or camouflaged to provide the appearance of being serviceable, such as by re-plating, shortening and re-threading long bolts, welding, straightening, machining, cleaning, polishing, or repainting.
2. Mutilation may be accomplished by one or a combination of the following procedures:
  - a) grinding,
  - b) burning,
  - c) removal of a major lug or other integral feature,
  - d) permanent distortion of parts,
  - e) cutting a hole with a cutting torch or saw,
  - f) melting,
  - g) sawing into many small pieces,
  - h) any other method accepted by the FIMAA on a case by case basis.
3. The following procedures are examples of mutilation that are often less successful because they may not be consistently effective:
  - a) stamping or vibro-etching,
  - b) spraying with paint,
  - c) small distortions, incisions or hammer marks,
  - d) identification by tag or markings,
  - e) drilling small holes,
  - f) sawing in two pieces only.
4. Since manufacturers producing approved aircraft components should maintain records of serial numbers for 'retired' certified life-limited or other critical components, the organisation that mutilates a component should inform the original manufacturer unless directed otherwise by the FIMAA.

## AMC 145.A.42(a)4 Acceptance of components

### STANDARD PARTS

- a) For a definition of 'Standard Parts' see EMAD 1.

- b) Documentation accompanying standard parts should clearly relate to the particular parts and contain a conformity statement plus both the manufacturing and supplier source (a Certificate of Conformity is sufficient). Some material is subject to special conditions such as storage condition or life limitation, etc. and this should be included on the documentation and/or material packaging.
- c) An EASA Form 1/EMAR Form 1 (SVY901) or equivalent is not normally issued and therefore none should be expected.

### AMC 145.A.42(a)5 Acceptance of components

- a) Consumable material is any material which is only used once, such as lubricants, cements, compounds, paints, chemicals, dyes, and sealants, etc.
- b) Raw material is any material that requires further work to make it into a component part of the aircraft such as metals, plastics, fabric, etc.
- c) Material, both raw and consumable, should only be accepted when satisfied that it is to the required specification. To be satisfied, the material and/or its packaging should be marked with the specification and, where appropriate, the batch number.
- d) Documentation accompanying all material should clearly relate to the particular material and contain a conformity statement plus both the manufacturing and supplier source. Some material is subject to special conditions such as storage condition, or life limitation, etc., and this should be included on the documentation and/or material packaging.
- e) The material specification is normally identified in the M(S)TC holder's data except in the case where the FIMAA has agreed otherwise. An EASA Form 1 /EMAR Form 1 (SVY901) or equivalent should not be issued for such material, and, therefore, none should be expected.
- f) Items purchased in batches (fasteners, etc.) should be supplied in a package. The packaging should state the applicable specification/standard, P/N, batch number, and the quantity of the items. The documentation accompanying the material should contain the applicable specification/standard, P/N, batch number, supplied quantity, and the manufacturing sources. If the material is acquired from different batches, acceptance documentation for each batch should be supplied.

### AMC 145.A.42(b) Acceptance of components

- a) The EMAR Form 1 (SVY901) (or other equivalent forms detailed at AMC 145.A.42(a)) identifies the status of an aircraft component. Block 12 'Remarks' on the EMAR Form 1 (SVY901) in some cases contains vital airworthiness related information which may need appropriate and necessary actions. The receiving maintenance organisation should be satisfied that the component in question is in satisfactory condition and has been appropriately released to service. In addition, the maintenance organisation should ensure that the component meets the approved data/standard, such as the

required design and modification standard. This may be accomplished by reference to the manufacturer's parts catalogue or other approved data (i.e. Service Bulletin). Care should also be taken in ensuring compliance with applicable ADs, the status of any life-limited parts fitted to the aircraft component as well as CDCCLs (if applicable).

- b) To ensure a component is in a satisfactory condition, the maintenance organisation should perform checks and verifications.
- c) Performance of the above checks and verifications should take place before the component is installed on the aircraft.
- d) The following list, though not exhaustive, contains typical checks to be performed:
  - i. verify the general condition of components and their packaging in relation to damages that could affect the integrity of the components;
  - ii. verify that the shelf life of the component has not expired;
  - iii. verify that items are received in the appropriate package in respect of the type of component: e.g. correct ATA 300 or electrostatic sensitive devices packaging, when necessary;
  - iv. verify that the component has all plugs and caps appropriately installed in accordance with approved data to prevent damage or internal contamination.

### AMC 145.A.42(c) Acceptance of components

1. The agreement by the FIMAA for the fabrication of parts by the maintenance organisation should be formalised through the approval of a detailed procedure in the MOE. This AMC contains principles and conditions to be taken into account for the preparation of an acceptable procedure.
2. Fabrication, inspection, assembly and test should be clearly within the technical and procedural capability of the maintenance organisation.
3. All necessary data to fabricate the part should be approved either by the FIMAA or the (Military) Type Certificate (TC) holder or EASA21/EMAR21 (or equivalent) Design Organisation Approval holder, or (Military) Supplemental Type Certificate (STC) holder.
4. Items fabricated by a maintenance organisation may only be used by that maintenance organisation in the course of overhaul, maintenance, modifications, or repair of aircraft or components undergoing work within its own facility. The fabrication of parts for other facilities may only take place if approved by the FIMAA. The permission to fabricate does not constitute approval for manufacture and the parts do not qualify for certification on EMAR Form 1 (SVY901). This prohibition also applies to the bulk transfer of surplus inventory, in that locally fabricated parts are physically segregated and excluded from any delivery certification. Fabricated parts are to be clearly labelled in a manner identified by the FIMAA.
5. Fabrication of parts, modification kits etc for onward supply may not be conducted by an maintenance organisation, unless otherwise approved by the FIMAA.

6. The data specified in paragraph 3 may include repair procedures involving the fabrication of parts. Where the data on such parts is sufficient to facilitate fabrication, the parts may be fabricated by a maintenance organisation. Care should be taken to ensure that the data includes details of part numbering, dimensions, materials, processes, and any special manufacturing techniques, special raw material specification or/and in-coming inspection requirement and that the maintenance organisation has the necessary capability. That capability should be defined by way of MOE content. Where special processes or inspection procedures are de-fined in the approved data which are not available at the maintenance organisation, the maintenance organisation cannot fabricate the part un-less the (Military) TC/STC-holder or EASA21/EMAR21 (or equivalent) Design Organisation Approval holder gives an approved alternative.
7. Examples of fabrication under the scope of an SIM-To-Lt-031 approval can include but are not limited to the following:
  - a) Fabrication of bushes, sleeves and shims.
  - b) Fabrication of secondary structural elements and skin panels.
  - c) Fabrication of control cables.
  - d) Fabrication of flexible and rigid pipes.
  - e) Fabrication of electrical cable looms and assemblies.
  - f) Formed or machined sheet metal panels for repairs.

All the above fabricated parts should be in accordance with data provided in overhaul or repair manuals, modification schemes and service bulletins, drawings or otherwise approved by the FIMAA.

Note: It is not acceptable to fabricate any item to pattern unless an engineering drawing of the item is produced which includes any necessary fabrication processes and which is acceptable to the FIMAA.

8. Where a (Military)TC/STC holder or an EASA21/EMAR21 (or equivalent) Approved Production Organisation is prepared to make available complete data which is not referred to in aircraft manuals or service bulletins but provides manufacturing drawings for items specified in parts lists, the fabrication of these items is not considered to be within the scope of an approval unless agreed otherwise by the FIMAA in accordance with a procedure specified in the MOE.

9. Inspection and Identification.

Any locally fabricated part should be subjected to an inspection stage before, separately, and preferably independently from, any inspection of its installation. The inspection should establish full compliance with the relevant manufacturing data, and the part should be unambiguously identified as fit for use by stating conformity to the approved data. Adequate records should be maintained of all such fabrication processes including heat treatment and the final inspections. Fabricated parts are to be clearly labelled in a manner identified by the FIMAA. All parts, except those having not enough space, should carry a part number which clearly relates it to the manufacturing/inspection data. Additional to the part-number the maintenance organisation's identity should be marked on the part for traceability purposes.

## AMC 145.A.42(d) Acceptance of components

1. The following types of components should typically be classified as un-salvageable:
  - a) Components with non-repairable defects, whether visible or not to the naked eye;
  - b) Components that do not meet design specifications, and cannot be brought into conformity with such specifications;
  - c) Components subjected to unacceptable modification, repair or rework that is irreversible;
  - d) Certified life-limited parts that have reached or exceeded their certified life limits, or have missing or incomplete records;
  - e) Components that cannot be returned to an airworthy condition due to exposure to extreme forces, heat or adverse environment;
  - f) Components for which conformity with an applicable AD cannot be accomplished;
  - g) Components for which maintenance records and/or traceability to the manufacturer/maintenance organisation cannot be retrieved.
2. Caution should be exercised to ensure that unsalvageable components are disposed of in a manner that does not allow them to be returned to service.

## GM 145.A.42(d) Acceptance of components

It is common practice for possessors of aircraft components to dispose of unsalvageable components by selling, discarding, or transferring such items. In some instances, these items have reappeared for sale and in the active parts inventories of the aviation community. Misrepresentation of the status of components and the practice of making such items appear serviceable have resulted in the use of unsalvageable non-conforming components. Therefore, organisations disposing of unsalvageable aircraft components should consider the possibility of such components later being misrepresented and sold as serviceable components.

## AMC 145.A.45(b) Maintenance data

1. Except as specified in subparagraph 5, each AMO should have access to and use the following minimum maintenance data relevant to the AMO's approval class rating: all maintenance related requirements and associated AMCs, approval specifications and Guidance Material, all applicable national maintenance requirements and notices which have not been superseded by a FIMAA requirement, procedure or directive and all applicable ADs as well as CDCCLs (if applicable).

2. In addition to subparagraph 1, an AMO with an approval class rating in Category A – Aircraft, should have access to and use the following maintenance data where published: the appropriate sections of the Aircraft Maintenance Programme, Aircraft Maintenance Manual, repair manual, supplementary structural inspection document, corrosion control document, Service Bulletins, service letters, service instructions, modification leaflets, NDT manual, parts catalogue, (Military) TC data sheet and any other specific document issued by the (Military) TC/STC holder or FIMAA or another appropriate authority as maintenance data.
3. In addition to subparagraph 1, an AMO with an approval class rating in Category B – Engines/APUs, should have access to and use the following maintenance data where published: the appropriate sections of the engine/APU maintenance and repair manual, Service Bulletins, service letters, modification leaflets, non-destructive testing (NDT) manual, parts catalogue, (Military) Type Certificate data sheet and any other specific document issued by the (Military) TC/STC holder or FIMAA as maintenance data.
4. In addition to subparagraph 1, an AMO with an approval class rating in Category C – Components other than complete engines/APUs, should have access to and use the following maintenance data where published: the appropriate sections of the component maintenance and re-pair manual, Service Bulletins and service letters plus any document issued by the (Military) TC/STC holder or FIMAA as maintenance data on whose product the component may be fitted when applicable.
5. Appropriate sections of the subparagraphs 2 to 4 additional maintenance data means in relation to the maintenance work scope at each particular maintenance facility. For example, a base maintenance facility should have access to almost complete set(s) of the maintenance data whereas a line maintenance facility may need only the maintenance manual and the parts catalogue.
6. An AMO only approved in class rating Category D –Specialised services, should hold and use all applicable specialised service(s) process specifications.

### AMC 145.A.45(c) Maintenance data

1. The referenced procedure should ensure that when maintenance personnel discover inaccurate, incomplete or ambiguous information in the maintenance data they should record the details. The procedure should then ensure that the maintenance organisation notifies the problem to the author of the maintenance data in a timely manner. A record of such communications to the author of the maintenance data should be retained by the maintenance organisation until such time as the (Military) TC/STC holder, EASA21/EMAR21 (or equivalent) Design Organisation Approval holder or FIMAA has clarified the issue by e.g. amending the maintenance data.
2. The referenced procedure should be specified in the MOE.

## AMC 145.A.45(d) Maintenance data

The referenced procedure should address the need for a practical demonstration by the maintenance personnel to the quality personnel of the proposed modified maintenance instruction. When satisfied the quality personnel should approve the modified maintenance instruction and ensure that the (Military) TC/STC holder, EASA21/EMAR21 (or equivalent) Design Organisation Approval holder or FIMAA is informed of the modified maintenance instruction. The procedure should include a paper/electronic traceability of the complete process from start to finish and ensure that the relevant maintenance instruction clearly identifies the modification. Modified maintenance instructions should only be used in the following circumstances:

- a) Where the (Military) TC/STC holder, EASA21/EMAR21 (or equivalent) Design Organisation Approval holder or FIMAA's original intent can be carried out in a more practical or more efficient manner.
- b) Where the (Military) TC/STC holder, EASA21/EMAR21 (or equivalent) Design Organisation Approval holder or FIMAA's original intent cannot be achieved by following the maintenance instructions. For example, where a component cannot be replaced following the original maintenance instructions.
- c) For the use of alternative tools/equipment.

Important Note: CDCCLs are airworthiness limitations. Any modification of the maintenance instructions linked to CDCCLs constitutes an aircraft modification that should be approved in accordance with SIM-To-Lt-035.

## AMC 145.A.45(e) Maintenance data

1. The maintenance organisation should:
  - a) Transcribe accurately the maintenance data onto such work cards or worksheets, or
  - b) Make precise reference to the particular maintenance task(s) contained in such maintenance data, which already identifies the task as a CDCCL where applicable.
2. Relevant parts of the maintenance organisation means with regard to aircraft base maintenance, aircraft line maintenance, engine workshops, mechanical workshops and avionic workshops. Therefore, engine work-shops for example should have a common system throughout such engine workshops that may be different to that in the aircraft base maintenance.
3. The work cards should differentiate and specify, when relevant, disassembly, accomplishment of task, reassembly and testing. In the case of a lengthy maintenance task involving a succession of personnel to complete such a task, it may be necessary to use supplementary work cards or worksheets to indicate what was actually accomplished by each individual person.

## GM 145.A.45(e) Maintenance Data

'Complex maintenance tasks' are neither minor scheduled line maintenance tasks nor simple defect rectification tasks. They therefore cannot be certified by a Category A Evidence of Qualification holder.

## AMC 145.A.45(f) Maintenance data

1. Data being made available to personnel maintaining aircraft means that the data should be available in close proximity to the aircraft being maintained for supervisors, mechanics, certifying and support staff to study.
2. Where computer systems are used, the number of computer terminals or maintenance data access points should be sufficient in relation to the size of the work programme to enable easy access, unless the computer system can produce paper copies. Where microfilm or microfiche readers/printers are used, a similar requirement is applicable.

## AMC 145.A.45(g) Maintenance data

1. To keep data up-to-date, a procedure should be set up to monitor the amendment status of all data and maintain a check that all amendments are being received by being a subscriber to any document amendment scheme. Special attention should be given to (Military) TC/STC related data such as certification life-limited parts, airworthiness limitations and Airworthiness Limitation Items (ALI), etc.
2. If paper copies are printed from computer systems, a procedure should be in place to ensure the control or destruction of such copies after use.

## AMC 145.A.47(a) Maintenance planning

1. Depending on the amount and complexity of work generally performed by the maintenance organisation, the planning system may range from a very simple procedure to a complex organisational set-up including a dedicated planning function in support of the maintenance function.
2. For the purpose of SIM-To-Lt-031, the maintenance planning function should include two complementary elements:
  - scheduling the maintenance work ahead, to ensure that it will not adversely interfere with other work as regards the availability of all necessary personnel, tools, equipment, material, maintenance data and facilities.

- during maintenance work, organising maintenance teams and shifts and provide all necessary support to ensure the completion of maintenance without undue time pressure.

3. When establishing the maintenance planning procedure, consideration should be given to the following:

- logistics,
- inventory control,
- square meters of accommodation,
- man-hours estimation,
- man-hours availability,
- preparation of work,
- hangar availability,
- environmental conditions (access, lighting standards and cleanliness),
- co-ordination with contracted/tasked maintenance organisations, internal and external suppliers, etc.
- scheduling of safety critical tasks during periods when staff are likely to be most alert,
- military operational commitments,
- location (e.g. Main Operating Base, Deployed Operating Base).

### AMC 145.A.47(b) Maintenance planning

Limitations of human performance, in the context of planning safety related tasks, refers to the upper and lower limits, and variations, of certain aspects of human performance (Circadian rhythm / 24 hours body cycle) which personnel should be aware of when planning work and shifts.

### AMC 145.A.47(c) Maintenance planning

The primary objective of the changeover / handover information is to ensure effective communication at the point of handing over the continuation or completion of maintenance actions. Effective task and shift hand-over depends on three basic elements:

- a) The outgoing person's ability to understand and communicate the important elements of the job or task being passed over to the incoming person.

- b) The incoming person's ability to understand and assimilate the information being provided by the outgoing person.
- c) A formalised process for exchanging information between outgoing and incoming persons and a planned shift overlap and a place for such exchanges to take place.

### AMC 145.A.48(b) Performance of maintenance

- a) The manufacturer's Instructions for Continuing Airworthiness should be followed when determining the need for an independent inspection.
- b) In the absence of maintenance and inspection standards published by the organisation responsible for the type design, maintenance tasks that involve the assembly or any disturbance of a control system and that, if errors occurred, could result in a failure, malfunction, or defect endangering the safe operation of the aircraft should be considered as flight safety sensitive maintenance tasks needing an independent inspection. A control system is an aircraft system by which the flight path, attitude, or propulsive force of the aircraft is changed, including the flight, engine and propeller controls (but not limited to these systems), the related system controls and the associated operating mechanisms. Maintenance tasks associated with the crew escape and safety systems should also be considered as flight safety sensitive maintenance tasks.
- c) A maintenance task requiring an independent inspection consists of an authorised person signing the maintenance task/release, who assumes full responsibility for the satisfactory completion of the work, before being subsequently inspected by an independent competent and authorised person who attests to the satisfactory completion of the work recorded and that no deficiencies have been found.
  - 1. A maintenance task requiring an independent inspection should therefore involve at least two persons, to ensure correct assembly, locking and sense of operation. A technical record of the inspection should contain the signatures of both persons before the relevant certificate of release to service is issued.
  - 2. The independent competent and authorised person is not issuing a maintenance release, therefore, is not required to hold certification privileges. However, they should be suitably qualified to carry out the inspection and must not have been involved in the work.
- d) The maintenance organisation should have procedures to demonstrate that independent signatories have been trained, and have gained experience on the specific systems being inspected.
- e) The following maintenance tasks should primarily be considered when inspecting aircraft control and crew escape and safety systems that have been disturbed:
  - 1. installation, rigging, and adjustment of flight controls;
  - 2. installation of aircraft engines, propellers; and rotors; and

3. overhaul, calibration or rigging of components such as engines, propellers, transmissions and gearboxes; and
4. installation and maintenance carried out on ejection seats.

Consideration should also be given to:

1. previous experience of maintenance errors, depending on the consequences of the failure; and
  2. information arising from an 'occurrence reporting system'; and
  3. information arising from the Operating Organisation/CAMO.
- f) When inspecting control systems and crew escape and safety systems that have undergone maintenance, the person signing the maintenance release and the person performing the independent inspection should consider the following points independently:
1. all those parts of the system that have actually been dis-connected or disturbed, should be inspected for correct assembly and locking;
  2. the system as a whole should be inspected for full and free movement over the complete range;
  3. cables should be tensioned correctly with adequate clearance at secondary stops;
  4. the operation of the system as a whole should be observed to ensure that the controls are operating in the correct sense;
  5. if the system is duplicated to provide redundancy, each system should be inspected separately; and
  6. if different systems are interconnected so that they affect each other, all interactions should be inspected through the full range of the applicable controls.

### AMC 145.A.48(c) Performance of maintenance

An assessment of both the cause and any potentially hazardous effect of any defect or combination of defects that could affect flight safety should be made in order to initiate any necessary further investigation and analysis necessary to identify the root cause of the defect and reported to the CAMO/Operating Organisation.

### AMC 145.A.50(a) Certification of maintenance

'Endanger flight safety' means any instance where safe operation could not be assured or which could lead to an unsafe condition. It typically includes, but is not limited to, significant cracking, deformation, corrosion or failure of primary structure, any evidence of burning, electrical arcing, significant hydraulic fluid or fuel leakage and any emergency system or total system failure. An AD overdue for compliance is also considered a hazard to flight safety.

### AMC 145.A.50(b) Certification of maintenance

1. The CRS for aircraft should contain the following statement:

Certifies that the work specified, except as otherwise specified, was carried out in accordance with SIM-To-Lt-031 and in respect to that work the aircraft/aircraft component is considered ready for release to service'.

Reference should also be made to the SIM-To-Lt-031 approval number.

2. It is acceptable to use an alternate abbreviated CRS for aircraft consisting of the following statement 'SIM-To-Lt-031 release to service' instead of the full certification statement specified in paragraph 1. When the alternate abbreviated CRS is used, the introductory section of the aircraft technical log should include an example of the full certification statement from paragraph 1.
3. The CRS should relate to the task specified in the (Military) TC/STC holder's or Operating Organisation's/CAMO's instructions or the Aircraft Maintenance Programme which itself may cross-refer to maintenance data.
4. The date such maintenance was carried out should include when the maintenance took place relative to any life or overhaul limitation in terms of date/flying hours/cycles/landings etc., as appropriate.
5. When extensive maintenance has been carried out, it is acceptable for the CRS to summarise the maintenance as long as there is a unique cross-reference to the work package containing full details of maintenance carried out. Dimensional information should be retained in the work-pack record.

### AMC 145.A.50(d) Certification of maintenance

1. The purpose of the CRS is to release assemblies/items/components/parts (hereafter referred to as 'item(s)') after maintenance and to release maintenance work carried out on such items under the approval of a FIMAA and to allow items removed from one aircraft/aircraft component to be fitted to another aircraft/aircraft component.
2. The CRS is to be used for export/import purposes, the transfer of items between pMS as well as for domestic purposes, and serves as an official certificate for items from the manufacturer/AMO to users.

3. It can only be issued by AMOs within the scope of their approval.
4. The CRS may be used as a rotatable tag (if using EMAR Form 1 – national equivalents may be able to be used this way also) by utilising the available space on the reverse side of the certificate for any additional information and dispatching the item with two copies of the certificate so that one copy may be eventually returned with the item to the AMO. The alternative solution is to use existing rotatable tags and also supply a copy of the certificate.
5. A CRS should not be issued for any item when it is known that the item is unserviceable except in the case of an item undergoing a series of maintenance processes at several AMOs and the item needs a certificate for the previous maintenance process carried out for the next AMO to accept the item for subsequent maintenance processes. In such a case, a clear statement of limitation should be endorsed in Block 12 of EMAR Form 1 (SVY901) (or equivalent).

### AMC 2 145.A.50(d) Certification of maintenance

1. A component which has been maintained off the aircraft needs the issuance of a CRS for such maintenance and another CRS in regard to being installed properly on the aircraft when such action occurs.
2. In the case of the issue of EMAR Form 1 (SVY901) (or equivalent) for components in storage before SIM-To-Lt-031 and SIM-To-Lt-035 became effective and not released on an EMAR Form 1 or equivalent in accordance with SIM-To-Lt-031 145.A.42(a) or removed serviceable from a serviceable aircraft or an aircraft which has been withdrawn from service the following applies:
  - 2.1. An EMAR Form 1 (SVY901) (or equivalent) may be issued for an aircraft component which has been:
    - 2.1.1. Maintained before SIM-To-Lt-031 became effective or manufactured before SIM-To-Lt-035 became effective.
    - 2.1.2. Used on an aircraft and removed in a serviceable condition. Examples include leased and loaned aircraft components, or “cannibalised” components.
    - 2.1.3. Removed from aircraft which have been withdrawn from service, or from aircraft which have been involved in abnormal occurrences such as accidents, incidents, heavy landings or lightning strikes.
    - 2.1.4. Maintained by an unapproved maintenance organisation.
  - 2.2. An appropriately rated AMO may issue an EMAR Form 1 (SVY901) (or equivalent) as detailed in this AMC subparagraph 2.5 to 2.9, as appropriate, in accordance with procedures detailed in the MOE as approved by the FIMAA. The appropriately rated AMO is responsible for ensuring that all reasonable measures have been taken to ensure that only approved and serviceable aircraft components are issued an EMAR Form 1 (SVY901) (or equivalent) under this paragraph.
  - 2.3. For the purposes of this AMC 2 only, ‘appropriately rated’ means an AMO with an approval class rating for the type of component or for the product in which it may be installed.

2.4. EMAR Form 1 (SVY901) (or equivalent) issued in accordance with this paragraph 2 should be issued by signing in Block 14b and stating 'Inspected' in Block 11. In addition, Block 12 should specify:

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 ADs, repairs and modifications known to have been incorporated. If no ADs 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 12. The maintenance history record and acceptance test report or statement, if applicable, should be attached to the EMAR Form 1 (SVY901) (or equivalent).

2.5. New/unused aircraft components.

2.5.1. Any unused aircraft component in storage without an EMAR Form 1 (or equivalent) up to the effective date(s) for SIM-To-Lt-035 that was manufactured by an organisation acceptable to the FIMAA at that time may be issued with an EMAR Form 1 (or equivalent) by an appropriately rated AMO. The EMAR Form 1 (or equivalent) should be issued in accordance with the following subparagraphs which should be included in a procedure within the MOE.

Note: It should be understood that the release of a stored but unused aircraft component in accordance with this paragraph represents a maintenance release under SIM-To-Lt-031 and not a production release under SIM-To-Lt-035. It is not intended to by-pass the production release procedure agreed by the pMS for parts and subassemblies intended for fitment on the manufacturer's own production line.

- a) An acceptance test report or statement should be available for all used and unused aircraft components that are subjected to acceptance testing after manufacturing or maintenance as appropriate.
- b) The aircraft component should be inspected for compliance with the manufacturer's instructions and limitations for storage and condition including any requirement for limited storage life, inhibitors, controlled climate and special storage containers. In addition, or in the absence of specific storage instructions, the aircraft component should be inspected for damage, corrosion and leakage to ensure good condition. Where military operational circumstances have prevented storage in accordance with the manufacturer's instructions, a procedure approved by the FIMAA should be defined and adhered to.
- c) The storage life used of any storage life-limited parts should be established.

2.5.2. If it is not possible to establish satisfactory compliance with all applicable conditions specified in subparagraph 2.5.1 (a) to (c) inclusive, the aircraft component should be disassembled by an

appropriately rated AMO and subjected to a check for incorporated ADs, repairs and modifications and inspected/tested in accordance with the maintenance data to establish satisfactory condition and, if relevant, all seals, lubricants and life-limited parts should be replaced. Upon satisfactory completion after reassembly, an EMAR Form 1 (SVY 901) (or equivalent) may be issued stating what was carried out and the reference of the maintenance data included.

2.6. Used aircraft components removed from a serviceable aircraft.

2.6.1. Serviceable aircraft components removed from a pMS registered aircraft may be issued with an EMAR Form 1 (SVY 901) (or equivalent) by an appropriately rated AMO subject to compliance with this subparagraph.

- a) The AMO should ensure that the component was removed from the aircraft by an appropriately qualified person.
- b) The aircraft component may only be deemed serviceable if the last flight operation with the component fitted revealed no faults on that component/related system.
- c) The aircraft component should be inspected for satisfactory condition including in particular damage, corrosion or leakage and compliance with any additional maintenance data.
- d) The aircraft record should be researched for any unusual events that could affect the serviceability of the aircraft component such as involvement in accidents, incidents, heavy landings or lightning strikes. Under no circumstances may an EMAR Form 1 (or equivalent) be issued in accordance with this paragraph 2.6 if it is suspected that the aircraft component has been subjected to extremes of stress, temperatures or immersion which could affect its operation.
- e) A maintenance history record should be available for all used serialised aircraft components.
- f) Compliance with known modifications and re-pairs should be established.
- g) The flight hours/cycles/landings as applicable of any service life-limited parts including time since overhaul should be established.
- h) Compliance with known applicable ADs should be established.
- i) Subject to satisfactory compliance with this subparagraph 2.6.1, an EMAR Form 1 (or equivalent) may be issued and should contain the information as specified in paragraph 2.4 including the aircraft from which the aircraft component was removed.

2.6.2. NOT APPLICABLE.

2.7. Used aircraft components removed from an aircraft withdrawn from service.

Serviceable aircraft components removed from an aircraft withdrawn from service may be issued with an EMAR Form 1 (or equivalent) by an AMO subject to compliance with this subparagraph.

- a) Aircraft withdrawn from service are sometimes dismantled for spares. This is considered to be a maintenance activity and should be accomplished under the control of an AMO, employing procedures approved by the FIMAA.
- b) To be eligible for installation, components removed from such aircraft may be issued with an EMAR Form 1 (or equivalent) by an appropriately rated AMO following a satisfactory assessment.
- c) As a minimum, the assessment will need to satisfy the standards set out in paragraphs 2.5 and 2.6 as appropriate. This should, where known, include the possible need for the alignment of scheduled maintenance that may be necessary to comply with the maintenance programme applicable to the aircraft on which the component is to be installed.
- d) Irrespective of whether the aircraft holds a Military Certificate of Airworthiness or not, the AMO responsible for certifying any removed component should ensure that the manner in which the components were removed and stored are compatible with the standards required by SIM-To-Lt-031.
- e) A structured plan should be formulated to control the aircraft disassembly process. The disassembly is to be carried out by an appropriately rated AMO under the supervision of certifying staff who will ensure that the aircraft components are removed and documented in a structured manner in accordance with the appropriate maintenance data and disassembly plan.
- f) All recorded aircraft defects should be reviewed and the possible effects these may have on both normal and standby functions of removed components are to be considered.
- g) Dedicated control documentation is to be used as detailed by the disassembly plan, to facilitate the recording of all maintenance actions and component removals performed during the disassembly process. Components found to be unserviceable are to be identified as such and quarantined pending a decision on the actions to be taken. Records of the maintenance accomplished to establish serviceability are to form part of the component maintenance history.
- h) Suitable SIM-To-Lt-031 facilities for the removal and storage of removed components are to be used which include suitable environmental conditions, lighting, access equipment, aircraft tooling and storage facilities for the work to be undertaken. While it may be acceptable for components to be removed, given local environmental conditions, without the benefit of an enclosed facility, subsequent disassembly (if required) and storage of the components should be in accordance with the manufacturer's recommendations.

2.8. Used aircraft components maintained by maintenance organisations not approved in accordance with SIM-To-Lt-031 (or equivalent).

For used components maintained by a maintenance organisation not approved under SIM-To-Lt-031 (or equivalent), due care should be taken before acceptance of such components. In such cases an appropriately rated AMO should establish satisfactory conditions by:

- a) dismantling the component for sufficient inspection in accordance with the appropriate maintenance data;
- b) replacing all service life-limit components when no satisfactory evidence of life used is available and/or the components are in an unsatisfactory condition;
- c) reassembling and testing as necessary the component;
- d) completing all certification requirements as specified in SIM-To-Lt-031 145.A.50.

#### 2.9. Used aircraft components removed from an aircraft involved in an accident or incident.

Such components should only be issued with an EMAR Form 1 (or equivalent) when processed in accordance with paragraph 2.7 and a specific work order including all additional necessary tests and inspections deemed necessary by the accident or incident. Such a work order may require input from the FIMAA/(Military) TC/STC holder or original manufacturer as appropriate. This work order should be referenced in Block 12.

### AMC 145.A.50(e) Certification of maintenance

1. Being unable to establish full compliance with subparagraph SIM-To-Lt-031 145.A.50(a) means that the maintenance required by the CAMO could not be completed due either to running out of available aircraft maintenance downtime for the scheduled check or by virtue of the condition of the aircraft requiring additional maintenance downtime.
2. The CAMO is responsible for ensuring that all required maintenance has been carried out before flight and therefore SIM-To-Lt-031 145.A.50(e) requires the CAMO to be informed in the case where full compliance with SIM-To-Lt-031 145.A.50(a) cannot be achieved. If the CAMO agrees to the deferment of full compliance, then the 'CRS for aircraft' may be issued subject to details of the deferment, including the CAMO's authority, being endorsed on the certificate.

Note: Whether or not the CAMO does have the authority to defer maintenance is an issue between the CAMO and the FIMAA. In case of doubt concerning such a decision of the CAMO, the AMO should inform its FIMAA on such doubt, before issuing the CRS. This should allow the FIMAA to investigate the matter as appropriate.

3. The procedure should draw attention to the fact that SIM-To-Lt-031 145.A.50(a) does not normally permit the issue of a 'CRS for aircraft' in the case of non-compliance and should state what action the mechanic, supervisor and certifying staff should take to bring the matter to the attention of the relevant department or person responsible for technical co-ordination with the CAMO so that the issue may be discussed and re-solved. In addition, the appropriate person(s) as specified in SIM-To-Lt-031 145.A.30(b) should be kept informed in writing of such possible non-compliance situations and this should be included in the procedure.

## AMC 145.A.50(f) Certification of maintenance

1. 'Appropriate release certificate' means a certificate which clearly states that the aircraft component is serviceable and clearly specifies the AMO releasing this component together with details of the authority under whose approval the AMO works including the approval or authorisation reference.
2. 'Compliance with all other technical and operational requirements' means making an appropriate entry in the aircraft technical log, checking for compliance with type design standards, modifications, repairs, ADs, life limitations and condition of the aircraft component plus information on where, when and why the aircraft was grounded.

## GM 145.A.55(a) Maintenance records

1. Properly executed and retained records provide CAMOs and maintenance personnel with information essential in controlling unscheduled and scheduled maintenance, and trouble-shooting to eliminate the need for re-inspection and rework to establish airworthiness.

The prime objective is to have secure and easily retrievable records with comprehensive and legible contents. The aircraft record should contain basic details of all serialised aircraft components and all other significant aircraft components installed, to ensure traceability to such installed aircraft component documentation and associated maintenance data as specified in SIM-To-Lt-031 145.A.45.

2. Some gas turbine engines are assembled from modules and a true total time in service for a total engine is not kept. When CAMOs wish to take advantage of the modular design, then total time in service and maintenance records for each module are to be maintained. The maintenance records as specified are to be kept with the module and should show compliance with any mandatory requirements pertaining to that module.
3. Reconstruction of lost or destroyed records can be done by reference to other records which reflect the time in service, research of records maintained by repair facilities and reference to records maintained by individual mechanics etc. When these things have been done and the record is still incomplete, the CAMO may make a statement in the new record de-scribing the loss and establishing the time in service based on the research and the best estimate of time in service. The reconstructed records should be submitted to the FIMAA for acceptance.

Note: Additional maintenance may be required.

4. The maintenance record can be either a paper or computer system or any combination of both.
5. Paper systems should use robust material which can withstand normal handling and filing. The record should remain legible throughout the required retention period.
6. Computer systems may be used to control maintenance and/or record details of maintenance work carried out. Computer systems used for maintenance should have at least one backup system which should

be updated at least within 24 hours of any maintenance. Each terminal is required to contain programme safeguards against the ability of unauthorised personnel to alter the database.

Note: An AMO's responsibility for recording all details of the maintenance work carried out ends with the completion of the CRS. It is the CAMO's responsibility to enter the information given in the CRS into the aircraft continuing airworthiness record system.

### AMC 145.A.55(c) Maintenance records

Associated maintenance data is specific information such as repair and modification data. This does not necessarily require the retention of all Aircraft Maintenance Manual, Component Maintenance Manual, Illustrated Parts Catalogue etc. issued by the (Military) TC/ STC holder. Maintenance records should refer to the revision status of the data used.

### AMC 145.A.60(a) Occurrence reporting

TO BE DEVELOPED IF REQUIRED.

### GM 145.A.60(a) Occurrence reporting

TO BE DEVELOPED IF REQUIRED.

### AMC 145.A.60(b) Occurrence reporting

1. The aim of occurrence reporting is to identify the factors contributing to incidents and to make the system resistant to similar errors.
2. An occurrence reporting system should enable and encourage free and frank reporting of any (potentially) safety related occurrence. This should be facilitated by the establishment of a "just culture". A maintenance organisation should ensure that personnel are not inappropriately punished for reporting or co-operating with occurrence investigations.
3. The internal reporting process should be closed-loop, ensuring that actions are taken internally to address safety hazards.
4. Feedback to reportees, both on an individual and more general basis, is important to ensure their continued support for the scheme.

## GM 145.A.60(c) Occurrence reporting

Each report should contain at least the following information:

- i. Maintenance organisation name and approval reference.
- ii. Information necessary to identify the subject aircraft and / or component.
- iii. Date and time relative to any life or overhaul limitation in terms of flying hours/cycles/landings etc. as appropriate.
- iv. Details of the condition as required by SIM-To-Lt-031 145.A.60(b).
- v. Any other relevant information found during the evaluation or rectification of the condition.

## AMC 145.A.65(a) Safety and quality policy, maintenance procedures and quality system

The safety and quality policy should as a minimum include a statement committing the maintenance organisation to:

- Recognise safety as a prime consideration at all times;
- Apply Human factors principles;
- Encourage personnel to report maintenance related errors/incidents;
- Recognise that compliance with procedures, quality standards, safety standards and regulations is the duty of all personnel;
- Recognise the need for all personnel to cooperate with the quality auditors;
- Ensure that safety standards are not reduced by commercial/operational imperatives;
- Train all maintenance organisation staff to be aware of human factors and set a continuous training programme in this field.

## AMC 145.A.65(b) Safety and quality policy, maintenance procedures and quality system

1. Maintenance procedures should be held current such that they reflect best practice within the maintenance organisation. It is the responsibility of all the maintenance organisation's personnel to report any differences via their maintenance organisation's internal occurrence reporting mechanisms.

2. All procedures, and changes to those procedures, should be verified and validated before use where practicable.
3. All technical procedures should be designed and presented in accordance with good human factors principles.

### AMC 145.A.65(b)(2) Safety and quality policy, maintenance procedures and quality system

Specialised services include any specialised activity, such as but not limited to non-destructive testing requiring particular skills and/or qualification. SIM-To-Lt-031 145.A.30(f) covers the qualification of personnel but, in addition, maintenance procedures should be established that cover the control of any specialised process.

### AMC 145.A.65(b)(3) Safety and quality policy, maintenance procedures and quality system

1. See GM 145.A.65(b)(3)
2. Procedures should be established to detect and rectify maintenance errors that could, as minimum, result in a failure, malfunction, or defect endangering the safe operation of the aircraft if not performed properly ('Safety-Critical' tasks). These procedures should identify the method for capturing errors, and the maintenance tasks or processes concerned. In order to determine the work items to be considered, the following maintenance tasks should primarily be reviewed to assess their impact on safety:
  - Installation, rigging and adjustments of flight controls;
  - Installation of aircraft engines, propellers and rotors;
  - Overhaul, calibration or rigging of components such as engines, propellers, transmissions and gearboxes;
  - installation and maintenance carried out on ejection seats

but additional information should also be processed, such as:

- Previous experiences of maintenance errors, depending on the consequence of the failure;
- Information arising from the 'occurrence reporting system' required by SIM-To-Lt-031 145.A.60;
- FIMAA requirements for error capturing, if applicable.

3. In order to prevent omissions, every maintenance task or group of tasks should be signed-off. To ensure the task or group of tasks is completed, it should only be signed-off after completion. Work by unauthorised personnel (i.e. temporary staff, trainee,...) should be checked by authorised personnel before they sign-off. The grouping of tasks for the purpose of signing-off should allow critical steps to be clearly identified.

Note: A “sign-off” is a statement by the competent person performing or supervising the work, that the task or group of tasks has been correctly performed. A sign-off relates to one step in the maintenance process and is therefore different to the release to service of the aircraft. “Authorised personnel” means personnel formally authorised by the maintenance organisation to sign-off tasks. “Authorised personnel” are not necessarily “certifying staff”.

4. The maintenance organisation should ensure that when carrying out a modification, repair or maintenance, CDCCL (if applicable) are not compromised; this should require the development of appropriate procedures where necessary by the maintenance organisation. The maintenance organisation should pay particular attention to possible adverse effects of any wiring change to the aircraft, even a change not specifically associated with the fuel tank system. For example, it should be common practice to identify segregation of fuel gauging system wiring as a CDCCL (if applicable). Maintenance organisations can prevent adverse effects associated with wiring changes by standardising maintenance practices through training, rather than by periodic inspection. Training should be provided to prevent indiscriminate routing and splicing of wires and to provide comprehensive knowledge of critical design features of fuel tank systems that would be controlled by a CDCCL (if applicable). AMC is provided for training to maintenance organisation personnel in Appendix IV to AMC 145.A.30(e).

## GM 145.A.65(b)(3) Safety and quality policy, maintenance procedures and quality system

1. Critical Tasks might not jeopardise safety on their own, but there could be a cumulative effect if the same maintainer reproduces the same error when he does the same tasks on several systems. The purpose of this procedure is therefore to minimise the rare possibility of an error being repeated whereby the identical aircraft components are not reassembled thereby compromising more than one system. One example is the remote possibility of failure to reinstall engine gearbox access covers or oil filler caps on all engines of a multi-engined aircraft resulting in major oil loss from all engines. Another example is the case of removal and refitment of multiple oil filler caps on one aircraft/engine or component, which could require a re-inspection of all oil filler caps on that particular aircraft/engine or component after the last oil filler cap has supposedly been refitted.
2. The maintenance of ignition prevention features is necessary for the inherent safety and reliability of an aircraft’s fuel tank system. The aircraft cannot be operated indefinitely with the failure of an ignition prevention feature. The failure will have a direct adverse effect on operational safety. It could prevent the continued safe flight and landing of the aircraft or cause serious or fatal injury to the occupants. The fuel system review required will identify ignition prevention features of the design. The failure of any of these features may not immediately result in an unsafe condition, but it may warrant certain maintenance to support continued airworthiness.

## AMC 145.A.65(c)(1) Safety and quality policy, maintenance procedures and quality system.

1. The primary objectives of the quality system are to enable the maintenance organisation to ensure that it can deliver a safe product and that the maintenance organisation remains in compliance with the requirements.
2. An essential element of the quality system is the independent audit.
3. The independent audit is an objective process of routine sample checks of all aspects of the maintenance organisation's ability to carry out all maintenance to the required standards and includes some product sampling as this is the end result of the maintenance process. It represents an objective overview of the complete maintenance related activities and is intended to complement the SIM-To-Lt-031 145.A.50(a) requirement for certifying staff to be satisfied that all required maintenance has been properly carried out before issue of the CRS for aircraft and components. Independent audits should include a percentage of random audits carried out on a sample basis when maintenance is being carried out. This means some audits during the night for those maintenance organisations that work at night, and some audits while in an operational environment (if appropriate).
4. Except as specified in subparagraph 9, the independent audit should ensure that all aspects of SIM-To-Lt-031 compliance are checked every 12 months and may be carried out as a complete single exercise or sub-divided over the 12-month period in accordance with a scheduled plan. The independent audit does not require each procedure to be checked against each product line when it can be shown that the particular procedure is common to more than one product line and the procedure has been checked every 12 months without resultant findings. Where findings have been identified, the particular procedure should be rechecked against other product lines until the findings have been rectified after which the independent audit procedure may revert back to 12 monthly for the particular procedure.
5. The independent audit should sample check one product on each product line every 12 months as a demonstration of the effectiveness of maintenance procedures compliance. It is recommended that procedures and product audits be combined by selecting a specific product example, such as an aircraft or engine or instrument and sample checking all the procedures and requirements associated with the specific product example to ensure that the end result should be an airworthy product.
  - a) For the purpose of the independent audit, a product line includes any product under an SIM-To-Lt-031 Appendix 1 approval class rating as specified in the approval schedule issued to the particular AMO.
  - b) It therefore follows for example that a maintenance organisation with a capability to maintain aircraft, re-pair engines, brakes and autopilots would need to carry out four complete audit sample checks each year except as specified otherwise in subparagraphs 5 or 9.

6. The sample check of a product means to witness any relevant testing and visually inspect the product and associated documentation. The sample check should not involve repeat disassembly or testing unless the sample check identifies findings requiring such action.
7. NOT APPLICABLE
8. Except as specified otherwise in subparagraph 9, where the maintenance organisation has line stations (such as but not limited to “out of area” locations, embarked operations if appropriate) listed as per SIM-To-Lt-031 145.A.75(d) the quality system should describe how these are integrated into the system and include a plan to audit each listed line station at a frequency consistent with the extent of flight and maintenance activity at the particular line station. Except as specified otherwise in subparagraph 9 the maximum period between audits of a particular line station should not exceed 24 months.
9. Except as specified otherwise in subparagraph 5, the FIMAA may agree to increase any of the audit time periods specified in AMC 145.A.65(c)(1) by up to 100% provided that there are no safety related findings and subject to being satisfied that the maintenance organisation has a good record of rectifying findings in a timely manner.
10. A report should be raised each time an audit is carried out describing what was checked and the resulting findings against applicable requirements, procedures and products.
11. The independence of the audit should be established by always ensuring that audits are carried out by personnel not responsible for the function, procedure or products being checked.

It therefore follows that a large maintenance organisation, being a maintenance organisation with more than about 500 maintenance staff should have a dedicated quality audit group whose sole function is to conduct audits, raise finding reports and follow up to check that findings are being rectified.

For the medium sized maintenance organisation, being a maintenance organisation with less than about 500 maintenance staff, it is acceptable to use competent personnel from one section/department not responsible for the maintenance function, procedure or product to audit the section/department that is responsible subject to the overall planning and implementation being under the control of the quality manager.

Maintenance organisations with a maximum of 10 maintenance staff actively engaged in carrying out maintenance may contract or delegate the independent audit element of the quality system to another organisation or a qualified and competent person, in both cases approved by the FIMAA.

## GM 145.A.65(c)(1) Safety and quality policy, maintenance procedures and quality system

1. The purpose of this GM is to give guidance on just one acceptable working audit plan to meet part of the needs of SIM-To-Lt-031 145.A.65(c)1. There is any number of other acceptable working audit plans.
2. The proposed plan lists the subject matter that should be covered by the audit and attempts to indicate applicability in the various types of work-shops and aircraft facilities. The list should therefore be tailored

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for the particular situation and more than one list may be necessary. Each list should be shown against a timetable to indicate when the particular item is scheduled for audit and when the audit was completed.

PARA	Comment	HANGAR	ENGINE Workshop	MECH Workshop	AVIONIC Workshop
145.A.25		Yes	Yes	Yes	Yes
145.A.30		Yes	Yes	Yes	Yes
145.A.35		Yes	Yes	Yes	Yes
145.A.40		Yes	Yes	Yes	Yes
145.A.42		Yes	Yes	Yes	Yes
145.A.45		Yes	Yes	Yes	Yes
145.A.47		Yes	Yes	Yes	Yes
145.A.48		Yes	Yes	Yes	Yes
145.A.50		Yes	Yes	Yes	Yes
145.A.55		Yes	Yes	Yes	Yes
145.A.60		Yes	Yes	Yes	Yes
145.A.65		Yes	Yes	Yes	Yes
2.1	MOE	Yes	Yes	Yes	Yes
2.2	MOE	Yes	Yes	Yes	Yes
2.3	MOE	Yes	Yes	Yes	Yes
2.4	MOE	Yes	Yes	Yes	Yes
2.5	MOE	Yes	Yes	Yes	Yes
2.6	MOE	Yes	Yes	Yes	Yes
2.7	MOE	Yes	Yes	Yes	Yes
2.8	MOE	Yes	Yes	Yes	Yes
2.9	MOE	Yes	Yes	Yes	Yes
2.10	MOE	Yes	No	No	No
2.11	MOE	Yes	Yes	Yes	Yes
2.12	MOE	Yes	Yes	Yes	Yes
2.13	MOE	Yes	Yes	Yes	Yes
2.14	MOE	Yes	Yes	Yes	Yes
2.15	MOE	Yes	No	No	No
2.16	MOE	Yes	Yes	Yes	Yes
2.17	MOE	if appl	if appl	if appl	if appl
2.18	MOE	Yes	Yes	Yes	Yes
2.19	MOE	Yes	Yes	Yes	Yes
2.20	MOE	Yes	Yes	Yes	Yes
2.21	MOE	if appl	if appl	if appl	if appl
2.22	MOE	Yes	Yes	No	No
2.23	MOE	Yes	No	No	No
2.24	MOE	Yes	Yes	Yes	Yes
2.25	MOE	Yes	Yes	Yes	Yes
2.26	MOE	Yes	Yes	Yes	Yes
2.27	MOE	Yes	Yes	Yes	Yes
2.28	MOE	Yes	Yes	Yes	Yes
L2.1	MOE	If appl	No	No	No
L2.2	MOE	If appl	No	No	No
L2.3	MOE	If appl	No	No	No
L2.4	MOE	If appl	No	No	No
L2.5	MOE	If appl	No	No	No

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L2.6	MOE	If appl	No	No	No
L2.7	MOE	If appl	No	No	No
3.9	MOE	if appl	if appl	if appl	if appl
3.10	MOE	if appl	if appl	if appl	if appl
3.11	MOE	if appl	if appl	if appl	if appl
3.12	MOE	Yes	Yes	No	No
3.13	MOE	Yes	Yes	Yes	Yes
3.14	MOE	Yes	Yes	Yes	Yes
145.A.70		Yes	Yes	Yes	Yes
145.A.75		Yes	Yes	Yes	Yes
145.A.80		Yes	Yes	Yes	Yes
145.A.85		Yes	Yes	Yes	Yes
145.A.95		if appl	if appl	if appl	if appl

Note 1: 'if appl' means if applicable or relevant.

Note 2: In the line station case all line stations should be audited at the frequency agreed with the FIMAA within the limits of AMC 145.A.65(c)(1).

### AMC 145.A.65(c)(2) Safety and quality policy, maintenance procedures and quality system

1. An essential element of the quality system is the quality feedback system.
2. The quality feedback system should not be contracted to outside persons. The principal function of the quality feedback system is to ensure that all findings resulting from the independent quality audits of the maintenance organisation are properly investigated and corrected in a timely manner and to enable the Accountable Manager to be kept in-formed of any safety issues and the extent of compliance with SIM-To-Lt-031.
3. The independent quality audit reports referenced in AMC 145.A.65(c)(1) subparagraph 10 should be sent to the relevant department(s) for rectification action giving target rectification dates. Rectification dates should be discussed with such department(s) before the quality department or nominated quality auditor confirms such dates in the report. The relevant department(s) are required by SIM-To-Lt-031 145.A.65(c)(2) to rectify findings and inform the quality department or nominated quality auditor of such rectification.
4. The Accountable Manager should hold regular meetings with staff to check progress on rectification except that in the large maintenance organisations such meetings may be delegated on a day to day basis to the quality manager subject to the Accountable Manager meeting at least twice per year with the senior staff involved to review the overall performance and receiving at least a half yearly summary report on findings of noncompliance.
5. All records pertaining to the independent quality audit and the quality feedback system should be retained for at least 2 years after the date of clearance of the finding(s) to which they refer or for such

periods as to support changes to the AMC 145.A.65(c)(1) subparagraph 9 audit time periods, whichever is the longer.

## AMC 145.A.70(a) Maintenance Organisation Exposition (MOE)

1. The information specified in SIM-To-Lt-031 145.A.70(a) subparagraphs (6) and (12) to (16) inclusive, whilst a part of the MOE, may be kept as separate documents or on separate electronic data files subject to the management part of this MOE containing a clear cross-reference to such documents or electronic data files.
2. The MOE should contain the information, as applicable, specified in this AMC and in the appendix V to AMC 145.A.70. The information may be presented in any subject order as long as all applicable subjects are covered. The MOE should contain a cross-reference list with an explanation as to where each SIM-To-Lt-031 Section A requirement is addressed in the MOE.
3. The MOE should contain information, as applicable, on how the maintenance organisation complies with CDCCL instructions (if applicable).
4. NOT APPLICABLE.
5. The maintenance organisation may use electronic data processing (EDP) for publication of the MOE. The MOE should be made available to the FIMAA in a form acceptable to the FIMAA. Attention should be paid to the compatibility of EDP publication systems with the necessary dissemination of the MOE, both internally and externally.
6. The following information should be included in the MOE:

### PART 0 GENERAL ORGANISATION

- 0.1 List of effective pages
- 0.2 List of issues / amendments / record of revisions
- 0.3 Distribution list
- 0.4 SIM-To-Lt-031 requirements cross-reference list
- 0.5 General information

### PART 1 MANAGEMENT

- 1.1 Corporate commitment by the Accountable Man-ager
- 1.2 Safety and quality policy
- 1.3 Management personnel

- 1.4 Duties and responsibilities of the management personnel
- 1.5 Management organisation chart
- 1.6 List of certifying staff and support staff
- 1.7 Manpower resources
- 1.8 General description of the facilities at each address intended to be approved
- 1.9 Organisations intended scope of work
- 1.10 Notification procedure to the FIMAA regarding changes to the maintenance organisation's activities/approval/location/personnel
- 1.11 MOE amendment procedures including, if applicable, delegated procedures

## PART 2 MAINTENANCE PROCEDURES

- 2.1 Supplier evaluation and contract/tasking control procedure
- 2.2 Acceptance/inspection of aircraft components and material
- 2.3 Storage, tagging and release of aircraft components and material to aircraft maintenance
- 2.4 Acceptance of tools and equipment
- 2.5 Calibration of tools and equipment
- 2.6 Use of tooling and equipment by staff (including alternative tools)
- 2.7 Cleanliness standards of maintenance facilities
- 2.8 Maintenance instructions and relationship to aircraft/aircraft component manufacturers' instructions including updating and availability to staff
- 2.9 Repair procedures
- 2.10 Aircraft Maintenance Programme compliance
- 2.11 Airworthiness Directives procedure
- 2.12 Optional modification procedure
- 2.13 Maintenance documentation in use and completion of same
- 2.14 Technical records control
- 2.15 Rectification of defects arising during base maintenance
- 2.16 Release to service procedure
- 2.17 Records for the CAMO
- 2.18 Reporting of defects

- 2.19 Return of defective aircraft components to store
- 2.20 Management of defective components with outside contractors/organisations
- 2.21 Control of computer maintenance records system
- 2.22 Control of manhour planning versus scheduled maintenance work
- 2.23 Control of critical maintenance tasks
- 2.24 Reference to specific maintenance procedures
- 2.25 Procedures to detect and rectify maintenance errors
- 2.26 Shift/task handover procedures
- 2.27 Procedures for notification of maintenance data inaccuracies and ambiguities to the author of the maintenance data
- 2.28 Maintenance planning procedures

#### PART L2 ADDITIONAL LINE MAINTENANCE PROCEDURES

- L2.1 Line maintenance control of aircraft components, tools, equipment, etc.
- L2.2 Line maintenance procedure related to servicing/fuelling/de-icing including inspection for/removal of de-icing/anti-icing fluid residues, etc.
- L2.3 Line maintenance control of defects and repetitive defects
- L2.4 Line procedure for completion of aircraft technical log
- L2.5 Line procedure for pooled parts and loan parts
- L2.6 Line procedure for return of defective parts removed from aircraft
- L2.7 Line procedure control of critical maintenance tasks

#### PART 3 QUALITY SYSTEM PROCEDURES

- 3.1 Quality audit of maintenance organisation procedures
- 3.2 Quality audit of aircraft and/or components
- 3.3 Quality audit remedial action procedure
- 3.4 Certifying staff and support staff qualification and training procedures
- 3.5 Certifying staff and support staff records
- 3.6 Procedures for qualifying of quality audit personnel
- 3.7 Procedures for qualifying of inspectors

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- 3.8 Procedures for qualifying of maintenance personnel
- 3.9 Aircraft or aircraft component maintenance tasks exemption process control
- 3.10 Concession control for deviation from the maintenance organisations' procedures
- 3.11 Qualification procedure for specialised activities such as NDT, welding, etc.
- 3.12 Control of manufacturers' and other maintenance working teams
- 3.13 Human factors training procedure
- 3.14 Competence assessment of personnel
- 3.15 Training procedures for On-the-Job Training as per Section 6 of Appendix 3 to SIM-He-Lt-030
- 3.16 Procedure for the issue of a recommendation to the Authority for the issue of an SIM-He-Lt-030 Evidence of Qualification (kelpoisuustodistus).

#### PART 4

This section is reserved for describing the procedures, paperwork and records associated with the CAMOs that place tasks on the maintenance organisation.

- 4.1 Contracting / tasking CAMO
- 4.2 CAMO procedures and paperwork
- 4.3 CAMO record completion

#### PART 5

- 5.1 Sample of documents
- 5.2 List of contracted/tasked maintenance organisations as per SIM-To-Lt-031 145.A.75(b)
- 5.3 List of Line maintenance locations as per SIM-To-Lt-031 145.A.75(d)
- 5.4 List of contracted/tasked maintenance organisations as per SIM-To-Lt-031 145.A.70(a)(16)

#### PART 6 OPERATING ORGANISATION'S MAINTENANCE PROCEDURES

#### PART 7 NOT APPLICABLE

PART 8 NOT APPLICABLE

## GM 145.A.70(a) Maintenance Organisation Exposition (MOE)

1. The purpose of the MOE is to detail the procedures, means and methods of the maintenance organisation.
2. Compliance with its contents will assure compliance with the requirements of SIM-To-Lt-031, which is a prerequisite to obtaining and retaining a maintenance organisation approval certificate.
3. SIM-To-Lt-031 145.A.70(a)(1) to (a)(11) constitutes the 'management' part of the MOE and therefore could be produced as one document and made available to the person(s) specified under SIM-To-Lt-031 145.A.30(b) who should be reasonably familiar with its contents. SIM-To-Lt-031 145.A.70(a)(6) list of certifying staff and support staff may be produced as a separate document.
4. SIM-To-Lt-031 145.A.70(a)(12) constitutes the working procedures of the maintenance organisation and therefore as stated in the requirement may be produced as any number of separate procedures manuals. It should be remembered that these documents should be cross-referenced from the management MOE.
5. Personnel are expected to be familiar with those parts of the MOE/manuals that are relevant to the maintenance work they carry out.
6. The maintenance organisation should specify in the MOE who should amend the MOE/manuals particularly in the case where there are several parts.
7. The quality manager should be responsible for monitoring the amendment of the MOE, unless otherwise agreed by the FIMAA, including associated procedures manuals and submission of the proposed amendments to the FIMAA. However, the FIMAA may agree via a procedure stated in the amendment section of the MOE that some defined class of amendments may be incorporated without prior approval by the FIMAA.
8. The MOE should cover four main parts:
  - a) The management MOE covering the parts specified earlier.
  - b) The maintenance procedures covering all aspects of how aircraft components may be accepted from outside sources and how aircraft, engines and or components will be maintained to the required standard.
  - c) The quality system procedures including the methods of qualifying mechanics, inspection, certifying staff, support staff and quality audit personnel.
  - d) Contracting/tasking procedures and paperwork.

9. The Accountable Manager’s MOE statement as specified under SIM-To-Lt-031 145.A.70(a)(1) should embrace the intent of the following paragraph and this statement may be used without amendment. Any modification to the statement should not alter the intent.

“This MOE and any associated referenced manuals define the organisation and procedures upon which the FIMAA, SIM-To-Lt-031 approval is based as re-quired by SIM-To-Lt-031 145.A.70. These procedures are approved by the undersigned and should be complied with, as applicable, when work orders are being progressed under the terms of the SIM-To-Lt-031 approval.

It is accepted that these procedures do not override the necessity of complying with any new or amend-ed regulation published by the FIMAA from time to time where these new or amended reg-ulations are in conflict with these procedures.

It is understood that the FIMAA will approve this maintenance organisation whilst the FIMAA is satisfied that the procedures are being followed and work standards maintained. It is further un-derstood that the FIMAA reserves the right to suspend, limit or revoke the approval of the mainte-nance organisation if the FIMAA has evidence that procedures are not followed or standards not upheld.”

Signed .....

Dated .....

Accountable Manager and ..... (quote position) .....

For and on behalf of .....(quote maintenance organisation’s name) .....

Whenever the Accountable Manager changes, it is important to ensure that the new Accountable Manager signs the paragraph 9 statement at the earliest opportunity.

Failure to carry out this action could invalidate the SIM-To-Lt-031 approval.

10. When an organisation is approved against any other EMAR (or EASA equivalent Regulation) containing a requirement for an Exposition, a SIM-To-Lt-031 MOE covering the differences will suffice to meet the requirements except that the SIM-To-Lt-031 MOE should reference where those parts missing from this MOE are covered.

## AMC 145.A.75(b) Privileges of the AMO

1. Working under the quality system of the AMO refers to the case of one maintenance organisation, not itself appropriately approved to SIM-To-Lt-031 that carries out aircraft line maintenance or minor engine maintenance or maintenance of other aircraft components or a specialised ser-vice as a contrac-tor/tasked maintenance organisation for a maintenance organisation appropriately approved under SIM-To-Lt-031. To be appropriately approved to contract/task with a non-approved maintenance organisa-tion, the AMO should have a procedure for the control of such contractors/tasked maintenance organi-sations as described below.

2. Maintenance of engines or engine modules other than a complete work-shop maintenance check or overhaul is intended to mean any maintenance that can be carried out without disassembly of the core engine or, in the case of modular engines, without disassembly of any core module.
3. Fundamentals of contracting/tasking a non-approved maintenance organisation under SIM-To-Lt-031.
  - 3.1. The fundamental reasons for allowing an AMO to contract/task a non-approved maintenance organisation certain maintenance tasks are:
    - a) To permit the acceptance of specialised maintenance services, such as, but not limited to, plating, heat treatment, plasma spray, fabrication of specified parts for minor repairs / modifications, etc., without the need for direct approval by the FIMAA in such cases.
    - b) To permit the acceptance of aircraft maintenance up to but not including a base maintenance check as specified in SIM-To-Lt-031 145.A.75(b) by maintenance organisations not appropriately approved under SIM-To-Lt-031 when it is unrealistic to expect direct approval by the FIMAA. The FIMAA should determine when it is unrealistic but in general it is considered unrealistic if only one or two AMOs intend to use the contracted/tasked maintenance organisation.
    - c) To permit the acceptance of component maintenance.
    - d) To permit the acceptance of engine maintenance up to but not including a workshop maintenance check or overhaul of an engine or engine module as specified in SIM-To-Lt-031 145.A.75(b) by maintenance organisations not appropriately approved under SIM-To-Lt-031 when it is unrealistic to expect direct approval by the FIMAA. The determination of unrealistic is as per subparagraph (b).
  - 3.2. When maintenance is carried out under the 'contract/task with a non-approved maintenance organisation' control system it means that for the duration of such maintenance, the SIM-To-Lt-031 approval has been temporarily extended to include the non-approved contractor/tasked maintenance organisation. Consequently those parts of the non-approved contractor's/tasked maintenance organisation's facilities, personnel and procedures involved with the AMO's products undergoing maintenance should meet SIM-To-Lt-031 requirements for the duration of that maintenance and it remains the AMO's responsibility to ensure such requirements are satisfied.
  - 3.3. For the criteria specified in subparagraph 3.1, the AMO is not required to have complete facilities for maintenance that it needs to contract/task. Nevertheless, it should have its own expertise to determine that the non-approved contractor/tasked maintenance organisation meets the necessary standards. However, a maintenance organisation cannot be approved unless it has the in-house facilities, procedures and expertise to carry out the majority of maintenance for which it wishes to be approved in terms of the number of class ratings.
  - 3.4. The AMO may find it necessary to include several specialist non-approved contractors/tasked maintenance organisations to enable it to be approved to completely certify the release to service of a particular product. Examples could be specialist welding, electro-plating, painting etc. To authorise the use of such non-approved contractors/tasked maintenance organisations, the FIMAA

should be satisfied that the AMO has the necessary expertise and procedures to control such non-approved contractors/tasked maintenance organisations.

- 3.5. An AMO working outside the scope of its approval schedule is deemed to be not approved for this work. Such an AMO should in this circumstance operate only under the contracted/tasked control of another AMO.
- 3.6. Authorisation to contract/task non-approved maintenance organisations is indicated by the FIMAA accepting the MOE containing a specific procedure on the control of non-approved contractors/tasked maintenance organisations.
4. Principal SIM-To-Lt-031 procedures for the control of contractors/tasked maintenance organisations not approved under SIM-To-Lt-031.
  - 4.1. A pre-audit procedure should be established whereby the AMO's 'contract/task a non-approved maintenance organisation' control section, which may also be the SIM-To-Lt-031 145.A.65(c) quality system independent audit section, should audit a prospective non-approved contractor/tasked maintenance organisation to determine whether those services of the non-approved contractor/tasked maintenance organisation that it wishes to use meet the intent of SIM-To-Lt-031.
  - 4.2. The AMO should assess to what extent it will use the non-approved contractor's/tasked maintenance organisation's facilities. As a general rule the AMO should require its own paperwork, approved data and material/spare parts to be used, but it could permit the use of tools, equipment and personnel from the non-approved contractor/tasked maintenance organisation as long as such tools, equipment and personnel meet the requirements of SIM-To-Lt-031. In the case of non-approved contractors/tasked maintenance organisations who provide specialised services it may, for practical reasons, be necessary to use their specialised services personnel, approved data and material subject to acceptance by the AMO.
  - 4.3. Unless the contracted/tasked maintenance work can be fully inspected on receipt by the AMO, the AMO should supervise the inspection and release from the non-approved contractor/tasked maintenance organisation. Such activities should be fully described in the MOE. The AMO should consider whether to use its own staff or authorise the non-approved contractor's/tasked maintenance organisation's staff.
  - 4.4. The CRS for components may be issued either at the non-approved contractor/tasked maintenance organisation or at the AMO facility by staff holding a certification authorisation in accordance with SIM-To-Lt-031 145.A.30 as appropriate. Such staff would normally come from the AMO but may otherwise be a person from the non-approved contractor/tasked maintenance organisation who meets the AMO certifying staff standard which itself is approved by the FIMAA via the MOE. The CRS for components and/or the EMAR Form 1 (SVY901) should always be issued under the AMO approval reference.
  - 4.5. The 'contract/task a non-approved maintenance organisation' control procedure should record audits of the non-approved contractor/tasked maintenance organisation, to have a corrective action follow-up plan and to know when non-approved contractors/tasked maintenance organisations are being used. The procedure should include a clear revocation process for non-approved contractors/tasked maintenance organisations who do not meet the AMO's requirements.

- 4.6. The AMO's quality audit staff should audit the 'non-approved maintenance organisation contract/tasking control section' and sample audit non-approved contractors/tasked maintenance organisations unless this task is already carried out by the quality audit staff as stated in subparagraph 4.1.
- 4.7. The contract between the AMO and the non-approved contractor/tasked maintenance organisation should contain a provision for the FIMAA or a qualified entity acting on behalf of the FIMAA to have right of access to the non-approved contractor/tasked maintenance organisation.

### AMC 145.A.80 Limitations on the AMO

This paragraph is intended to cover the situation where an AMO may temporarily not hold all the necessary tools, equipment etc., for an aircraft type or variant specified in the AMO's approval. This paragraph means that the FIMAA need not amend the approval to delete the aircraft type or variants on the basis that it is a temporary situation and there is a commitment from the AMO to re-acquire tools, equipment etc. before maintenance on the type may recommence.

## SECTION B

# PROCEDURES FOR NATIONAL MILITARY AIRWORTHINESS AUTHORITIES

NOT APPLICABLE

### AMC to EMAR Form 1 (SVY901)

EMAR Form 1 (SVY901) is contained in the EMAR Forms document. SVY901 is contained in the webpage <https://ilmavoimat.fi/svy/lomakkeet> and the defence forces' intranet Torni > Puolustusvoimat > Ilmavoimat > Sotilasilmailun viranomaisyksikkö > Lomakkeet.

AMC to EMAR Form 1 is contained in the EMAR Forms document.

SVY901 is the national equivalent to EMAR Form 1 and should be filled in the same way as EMAR Form 1

## APPENDICES TO AMCs

### Appendix I SVY904 (EMAR Form 4)

SVY904 (EMAR Form 4) is contained in the webpage <https://ilmavoimat.fi/svy/lomakkeet> and in the defence forces' intranet Tornii > Puolustusvoimat > Ilmavoimat > Sotilasilmailun viranomaisyksikkö > Lomakkeet. (EMAR Forms document).

### Appendix II to SVY906 (EMAR Form 6)

NOT APPLICABLE

### Appendix III to AMC 145.A.15 SVY902 (EMAR Form 2)

SVY902 (EMAR Form 2) is contained in is contained in the webpage <https://ilmavoimat.fi/svy/lomakkeet> and the defence forces' intranet Tornii > Puolustusvoimat > Ilmavoimat > Sotilasilmailun viranomaisyksikkö > Lomakkeet (EMAR Forms document).

### Appendix IV to AMC 145.A.30(e) Fuel Tank Safety training

This Appendix includes general instructions for providing training on Fuel Tank Safety (FTS) issues.

A. Applicability:

As defined by the FIMAA.

B. Affected organisations:

AMOs involved in the maintenance of aircraft specified in paragraph a) and fuel system components installed on such aircraft when the maintenance data are affected by CDCCL (if applicable).

CAMO's involved in the continuing airworthiness management of aeroplanes specified in paragraph a).

C. Persons from affected organisations who should receive training:

Phase 1 only:

The group of persons representing the maintenance management structure of the AMO, the quality manager and the staff required to quality monitor the AMO.

Phase 1 + Phase 2 + Continuation training

Personnel of the AMO required to plan, perform, supervise, inspect and certify the maintenance of aircraft and fuel system components specified in paragraph a)

Personnel of the CAMO involved in the management and review of the continuing airworthiness of aircraft specified in paragraph a).

D. General requirements of the training courses

Phase 1 – Awareness

The training should be carried out before the person starts to work with-out supervision but not later than 6 months after joining the AMO.

Type:

Should be an awareness course with the principal elements of the subject. It may take the form of a training bulletin, or other self-study or informative session. Signature of the reader is required to ensure that the person has passed the training.

Level:

It should be a course at the level of familiarisation with the principal elements of the subject.

Objectives:

The trainee should, after the completion of the training:

1. Be familiar with the basic elements of the fuel tank safety is-sues.
2. Be able to give a simple description of the historical back-ground and the elements requiring a safety consideration, using common words and showing examples of non-conformities.
3. Be able to use typical terms.

Content: The course should include:

- a short background showing examples of FTS accidents or incidents,
- the description of concept of fuel tank safety (and CDCCL if applicable),
- some examples of manufacturers documents showing CDCCL items (if applicable),

- typical examples of FTS defects,
- some examples of (Military) TC/ STC holders repair data,
- some examples of maintenance instructions for inspection.

Phase 2 – Detailed training

Type: Should be a more in-depth internal or external course. It should not take the form of a training bulletin, or other self-study. An examination should be required at the end, which should be in the form of a multi choice questionnaire, and the pass mark of the examination should be 75%.

Level: It should be a detailed course on the theoretical and practical elements of the subject.

The training may be made either:

- in appropriate facilities containing examples of components, systems and parts affected by FTS issues. The use of films, pictures and practical examples on FTS is recommended; or
- by attending a distance course (e-learning or computer-based training) including a film when such film meets the in-tent of the objectives and content here below. An e-learning or computer-based training should meet the following criteria:
  - A continuous evaluation process should ensure the effectiveness of the training and its relevance;
  - Some questions at intermediate steps of the training should be proposed to ensure that the trainee is authorized to move to the next step;
  - The content and results of examinations should be recorded;
  - Access to an instructor in person or at distance should be possible in case support is needed.

A duration of 8 hours for phase 2 is an acceptable compliance.

When the course is provided in a classroom, the instructor should be very familiar with the data in Objectives and Guidelines. To be familiar, an instructor should have attended himself a similar course in a class-room and made additionally some lecture of related subjects.

Objectives:

The attendant should, after the completion of the training:

- have knowledge of the history of events related to FTS issues and the theoretical and practical elements of the subject, have an overview of all relevant requirements and/or regulations as defined by the FIMAA, be able to give a detailed description of

the concept of fuel tank system Air-worthiness Limitation Instructions (ALI) (including CDCCL if applicable), and using theoretical fundamentals and specific examples;

- have the capacity to combine and apply the separate elements of knowledge in a logical and comprehensive manner;
- have knowledge on how the above items affect the aircraft;
- be able to identify the components or parts of the aircraft subject to FTS from the manufacturer's documentation,
- be able to plan the action or apply a Service Bulletin, an AD or national equivalent.

Content: Following the guidelines described in paragraph e.

#### Continuation training

The AMO/CAMO should ensure that the continuation training is required in each two years period. The syllabus of the training programme referred to in 3.4 of the MOE or 0.3(e) of the CAME should include the additional syllabus for this continuation training.

The continuation training may be combined with the phase 2 training in a classroom or at distance.

The continuing training should be updated when new instructions are issued which are related to the material, tools, documentation and manufacturer's or FIMAA's directives.

#### E. Guidelines for preparing the content of Phase 2 courses.

The following guidelines should be taken into consideration when the phase 2 training programme is being established:

- a) understanding of the background and the concept of FTS;
- b) how the mechanics can recognise, interpret and handle the improvements in the instruction for continuing airworthiness that have been made or are being made regarding the fuel tank system maintenance;
- c) awareness of any hazards especially when working on the fuel system, and when the Flammability Reduction System (FRS) using nitrogen is installed.

Paragraphs a) b) and c) above should be introduced in the training programme addressing the following issues:

- i. The theoretical background behind the risk of FTS: the explosions of mixtures of fuel and air, the behaviour of those mixtures in an aviation environment, the effects of temperature and pressure, energy needed for ignition etc, the 'fire triangle'.

Explain 2 concepts to prevent explosions:

1. ignition source prevention and
  2. flammability reduction.
- ii. The major accidents related to fuel tank systems, the accident investigations and their conclusions.
  - iii. ignition prevention program initiatives and goals, to identify unsafe conditions and to correct them, to systematically improve fuel tank maintenance.
  - iv. Explain briefly the concepts that are being used: the results of Special Federal Aviation Regulation 88 (SFAR 88) of the Federal Aviation Administration (FAA), Joint Aviation Authorities Temporary Guidance Leaflet 47(JAA TGL 47), Joint Aviation Authorities Interim Policy Letter 25/12 (JAA INT/POL 25/12) and any other unique FIMAA initiatives: modifications, airworthiness limitations items and CDCCL (if applicable).
  - v. Where relevant information can be found and how to use and interpret this information in the instructions for continuing airworthiness (aircraft maintenance manuals, component maintenance manuals, Service Bulletins...).
  - vi. FTS during maintenance: fuel tank entry and exit procedures, clean working environment, what is meant by configuration control, wire separation, bonding of components etc.
  - vii. FRS when installed: reason for their presence, their effects, the hazards of an FRS using nitrogen for maintenance, safety precautions in maintenance/working with an FRS.
  - viii. Recording maintenance actions, recording measures and results of inspections.

The training should include a representative number of examples of defects and the associated repairs as required by the (Military) TC/ STC holder's maintenance data.

#### F. Approval of training

For AMOs/CAMOs, the approval of the initial and continuation training programme and the content of the examination can be achieved through the MOE/CAME.

## Appendix V to AMC 145.A.70: Maintenance Organisation Exposition (MOE)

**Note:** To facilitate the reading and understanding of this Appendix, the following writing conventions are being used which applies to each MOE chapter:

- Expected content of the maintenance organisation’s MOE:

This Appendix is developed in a “check list format” to facilitate compliance check of the minimum expected content of the MOE. In particular the check boxes ( ) are indicating the “expected content” of each chapter/paragraph. The expected content is identified with normal font. It has to be considered however, that this Appendix applies to any maintenance organisation with any scope of approval, therefore it is the maintenance organisation responsibility to identify the “expected content” applicable to the maintenance organisation. When an “MOE paragraph” is identified in this Appendix, the same paragraphs structure is expected to be found in the MOE.

- Comments:

Comments and supporting information are inserted in “italics” font. They are only in-tended to provide additional clarifications.

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- 0.5 General information

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#### **PART 6 – OPERATING ORGANISATION'S MAINTENANCE PROCEDURES**

**PART 0 – GENERAL ORGANISATION**

**0.1 List of effective pages**

Example:

Page	Revision
1	Original
2	Original

Page	Revision
3	Original
4	Original

Page	Revision
5	Original
.....	.....

**0.2 List of issues / amendments / record of revisions**

Example:

Issue number	Revision number	Date	Reason for change
1	0	19/12/06	n/a
2	0	01/01/12	Extension of the A1 scope of approval
	1	01/01/14	New procedure for cleaning

**0.3 Distribution list**

The document should include a distribution list to ensure proper distribution of the MOE and to demonstrate to the FIMAA that all personnel involved in maintenance have access to the relevant information. This does not mean that all personnel have to be in receipt of a MOE but that a reasonable number of copies are distributed within the organisation(s) so that all personnel may have quick and easy access to it. Reference should also be made to the location of any e-copies of the MOE.

*Accordingly, the MOE should be distributed to:*

- *the Operating Organisation’s management personnel (if the AMO is part of an Operating Organisation),*
- *the AMO’s management personnel and any person at a lower level as necessary; and*
- *the SIM-To-Lt-036 contracting/tasking CAMO(s); and,*
- *the FIMAA.*

**0.4 SIM-To-Lt-031 requirements cross-reference list**

The MOE should contain a cross-reference list with an explanation as to where each SIM-To-Lt-031 Section A requirement is addressed in the MOE.

**0.5 General information**

This chapter should illustrate how the maintenance organisation will be independent from other organisational functions (e.g. production tasks, operations). It should describe broadly how the whole organisation (i.e. including the Operating Organisation or OEM) is organised under the management of the Accountable Manager and should refer to the organisation charts of paragraph 1.5.).

**PART 1 – MANAGEMENT**

**1.1 Corporate commitment by the Accountable Manager.**

(The Accountable Manager’s MOE statement should embrace the intent of the following paragraph and this statement may be used without amendment. Any modification to the statement should not alter the intent.)

“This MOE and any associated referenced manuals define the organisation and procedures upon which the (FIMAA) SIM-To-Lt-031 approval is based as required by SIM-To-Lt-031 145.A.70. These procedures are approved by the undersigned and should be complied with, as applicable, when work orders are being progressed under the terms of the SIM-To-Lt-031 approval.

It is accepted that these procedures do not override the necessity of complying with any new or amended regulation published by the (FIMAA) from time to time where these new or amended regulations are in conflict with these procedures.

It is understood that the (FIMAA) will approve this maintenance organisation whilst the (FIMAA) is satisfied that the procedures are being followed and work standards maintained. It is further understood that the (FIMAA) reserves the right to suspend, limit or revoke the approval of the maintenance organisation if the (FIMAA) has evidence that procedures are not followed or standards not upheld.”

Signed .....

Dated .....

Accountable Manager and ..... (quote position) .....

For and on behalf of .....(quote maintenance organisation’s name) .....

## 1.2 Safety and quality policy.

The safety and quality policy shall, as a minimum, include a statement committing the maintenance organisation to:

- Apply human factors principles.
- Encourage personnel to report maintenance related errors/incidents to meet SIM-To-Lt-031 requirements.
- Recognise safety as a prime consideration at all times for all the staff.
- Recognise that compliance with procedures, quality standards and regulations is the duty of all personnel.
- Recognise the need for all personnel to cooperate with the quality auditors.
- Ensure that safety standards are not reduced by commercial/operational imperatives.
- Train all maintenance organisation staff to be aware of human factors and set a continuous training programme in this field.

## 1.3 Management personnel.

This chapter shall identify the maintenance management personnel of the maintenance organisation by listing, as minimum, the title and names of the Accountable manager plus all the persons nominated to hold a position as required by SIM-To-Lt-031 145.A.30 (b). Their respective deputies have also to be identified. The group of "nominated persons" shall be chosen/identified so that all the SIM-To-Lt-031 functions are covered under their respective responsibilities and their credentials shall be submitted to the FIMAA using an SVY904 (Form 4).

- 1.3.1 Accountable Manager and Deputy;**
- 1.3.2 Nominated Persons:**

base maintenance manager

- line maintenance manager
- workshop manager
- quality manager

Other posts may be added if desired but it should be clearly shown whether or not they are considered as part of the 'maintenance management structure' for SVY904 (EMAR Form 4) purposes. A marked separation (dividing line) would suffice with the text "No SVY904 (EMAR Form 4) required".

- 1.3.3 Deputy Nominated Personnel**
- 1.3.4 Responsible NDT Level 3 (if applicable).**

#### **1.4 Duties and responsibilities of the management personnel.**

The duties and responsibilities of all management personnel identified in the MOE chapter 1.3 must be detailed in this chapter. It shall be ensured that all EMAR 145 functions are addressed, as applicable to the maintenance organisation.

Any EMAR 145 function, which is applicable to the maintenance organisation (e.g. to perform the independent audit, to issue the EMAR 145 Certifying staff/Support staff individual authorisation, to have available appropriate facilities, tools and equipment, to issue a certificate of release to service, etc.) shall be under the responsibility of a Nominated Person as listed in MOE chapter 1.3 who shall ensure compliance of that function with the relevant EMAR 145 requirements.

The responsibilities of a Nominated person cannot be delegated to other Manager(s) unless such Manager(s) is/are identified as "Deputy Nominated Person" for the related function (i.e. Deputy Maintenance Manager).

The duties of any Nominated Person may be delegated to other Manager(s) who are reporting to him/her.

##### **1.4.1 Accountable Manager.**

- The Accountable Manager is responsible for ensuring that maintenance carried out by the AMO meets the standards required by the FIMAA;
- He/she is responsible for establishing and promoting the safety and quality policy specified in EMAR 145.A.65 (a);
- He/she is responsible for nominating the management staff;
- He/she is responsible for ensuring that the necessary resources and facilities are available to enable the organisation to perform the maintenance to which it is tasked/contracted and any additional work which may be undertaken;
- He/she is responsible for the supervision of the progress of the corrective actions/review of the overall results in terms of quality;
- He/she is responsible for ensuring the competence of all personnel including management personnel has been assessed;
- He/she is responsible to return the approval to the FIMAA in case of surrender or revocation.

Any additional duties and responsibilities may be added provided that they do not conflict with those of the other management personnel. Depending on the structure of the maintenance organisation some duties may be distributed differently.

##### **1.4.2 Quality Manager.**

Duties and Responsibilities. The following list is not exhaustive.

- The Quality Manager is responsible for establishing an independent quality assurance system to monitor compliance of the maintenance organisation with EMAR 145 requirements;

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- He/she shall have direct access to the Accountable Manager on matters concerning the quality system;
- Defining the human factors principles to be implemented within the maintenance organisation;
- He/she is responsible for implementing a quality audit programme in which compliance with all maintenance procedures is reviewed at regular intervals in relation to each type of aircraft (or component) maintained (including the management and completion of audits and production of audit reports). He/she should ensure that any observed non-compliances or poor standards are brought to the attention of the person concerned via his/her manager;
- He/she is responsible for follow up and closure of any non-conformance;
- The Quality Manager should establish regular meetings with the Accountable Manager to appraise the effectiveness of the quality system. This will include details of any reported discrepancy not being adequately addressed by the relevant person or in respect of any disagreement concerning the nature of a discrepancy;
- He/she is responsible for preparing standard practices and procedures (MOE, including the associated procedure(s) for use within the maintenance organisation and ensuring their adequacy regarding SIM-To-Lt-031 and any amendments to the requirements;
- He/she is responsible for submission of the MOE and any associated amendments, to the FIMAA for approval (which includes completion of and submission of SVY902(s) (EMAR Form(s) 2), SVY904(s) (EMAR Form(s) 4) or equivalent);
- He/she is responsible for assessing contractors/tasked organisations and suppliers for satisfactory product quality in relation to the airworthiness needs of the maintenance organisation;
- He/she is responsible for issue /renewal/cancellation of SIM-To-Lt-031 Certifying Staff/Support Staff individual authorisations;
- He/she is responsible for co-ordinating action on airworthiness occurrences and for initiating any necessary further investigation and follow-up activity;
- He/she is responsible for establishing feedback from maintenance incidents/issues and feeding these back into the continuation training programme;
- He/she is responsible for assessing non-approved contractors/tasked organisation working under the quality system and maintaining the expertise necessary to be able to do so, to the satisfaction of the FIMAA. He/she is also responsible for assessing external specialist services required to be used by the organisation in the performance of maintenance;

It must be reminded that the quality system is required to be "independent" which normally means that the Quality Manager and the Quality Monitoring Staff are not directly involved in the SIM-To-Lt-031 function being audited.

**Depending on the organisation structure, some of the quality system duties may be delegated to one or several managers who report to the Quality manager and are therefore not subject to an SVY904 (EMAR Form 4).**

### **1.4.3 Maintenance Manager (may be Base Maintenance Manager and / or Line Maintenance Manager and / or Workshop Maintenance Manager).**

Duties and Responsibilities. The following list is not exhaustive.

- He/she is responsible for the satisfactory completion and certification of all work for which the maintenance organisation has been contracted/tasked in accordance with the work specification (Work Order and approved MOE procedures);
- He/she is responsible for ensuring that the maintenance organisation's procedures and standards are complied with when carrying out maintenance;
- He/she is responsible for ensuring the competence of all personnel engaged in maintenance;
- He/she is responsible for establishing a programme of training and continuation training using internal and/or external sources (this responsibility may be also under the Quality Manager);
- He/she is responsible for ensuring that all contracts/taskings are correctly detailed and that the requirements of the contract/task are fulfilled in respect of inspection and quality control;
- He/she is responsible for providing feedback to the Quality System about the services provided by contracted/tasked organisations;
- He/she is responsible for responding to quality deficiencies in the area of activity for which he/she is responsible, which arise from independent quality audits;
- He/she is responsible for ensuring, through the workforce under his/her control, that the quality of workmanship in the final product is to a standard acceptable to the maintenance organisation and the FIMAA;
- He/she is responsible for the implementation of the safety policy and human factor issues;
- He/she is responsible for availability of facilities appropriate to the planned work including hangars, workshops office accommodation, stores, etc. as applicable for the planned work;
- He/she is responsible for availability of a working environment appropriate to the tasks being undertaken;
- He/she is responsible for the incoming inspection of components, parts, materials, tools and equipment, the related classification, segregation and storage according to the manufacturer's recommendations (where practicable see AMC 145.A.25(d)1);
- He/she is responsible to develop a production planning system appropriate to the amount and complexity of the maintenance scope of work;
- He/she is responsible for availability of tools, equipment and materials to perform the planned tasks;
- He/she is responsible for availability of sufficient competent personnel to plan, perform, supervise, inspect and certify the work being performed;

- He/she is responsible for availability of all necessary maintenance data as required by SIM-To-Lt-031 145.A.45;
- He/she is responsible for recording and notifying any inaccurate, in-complete or ambiguous procedure, practice information or maintenance instruction contained in the maintenance data used by maintenance personnel to the author of the maintenance data;
- He/she is responsible for providing a common work card or worksheet system to be used throughout relevant parts of the maintenance organisation and ensure such documents comply with SIM-To-Lt-031 145.A.45 (e);
- He/she is responsible for notifying the Accountable Manager whenever deficiencies emerge which require his/her attention in respect of finance and the acceptability of standards (Accountable Manager and Quality Manager to be officially informed of any lack of 25% of available man-hours over a calendar month);
- He/she is responsible for supplying the necessary technical documents and storage of the maintenance organisation's technical records.

Any additional duties and responsibilities may be added provided they do not conflict with those of other management personnel.

Depending on the organisation structure, some of the maintenance duties may be delegated to one or several managers who report to the Maintenance Manager and are therefore not subject to an SVY904 (EMAR Form 4).

#### **1.4.4 Other posts.**

This section can be continued with the terms of reference of additional management personnel, who report to the upper level of management, as necessary to fully describe the maintenance organisation.

These personnel would not normally be required to complete an SVY904 (EMAR Form 4).

#### **1.4.5 Responsible NDT level 3.**

Duties and Responsibilities. The following list is not exhaustive.

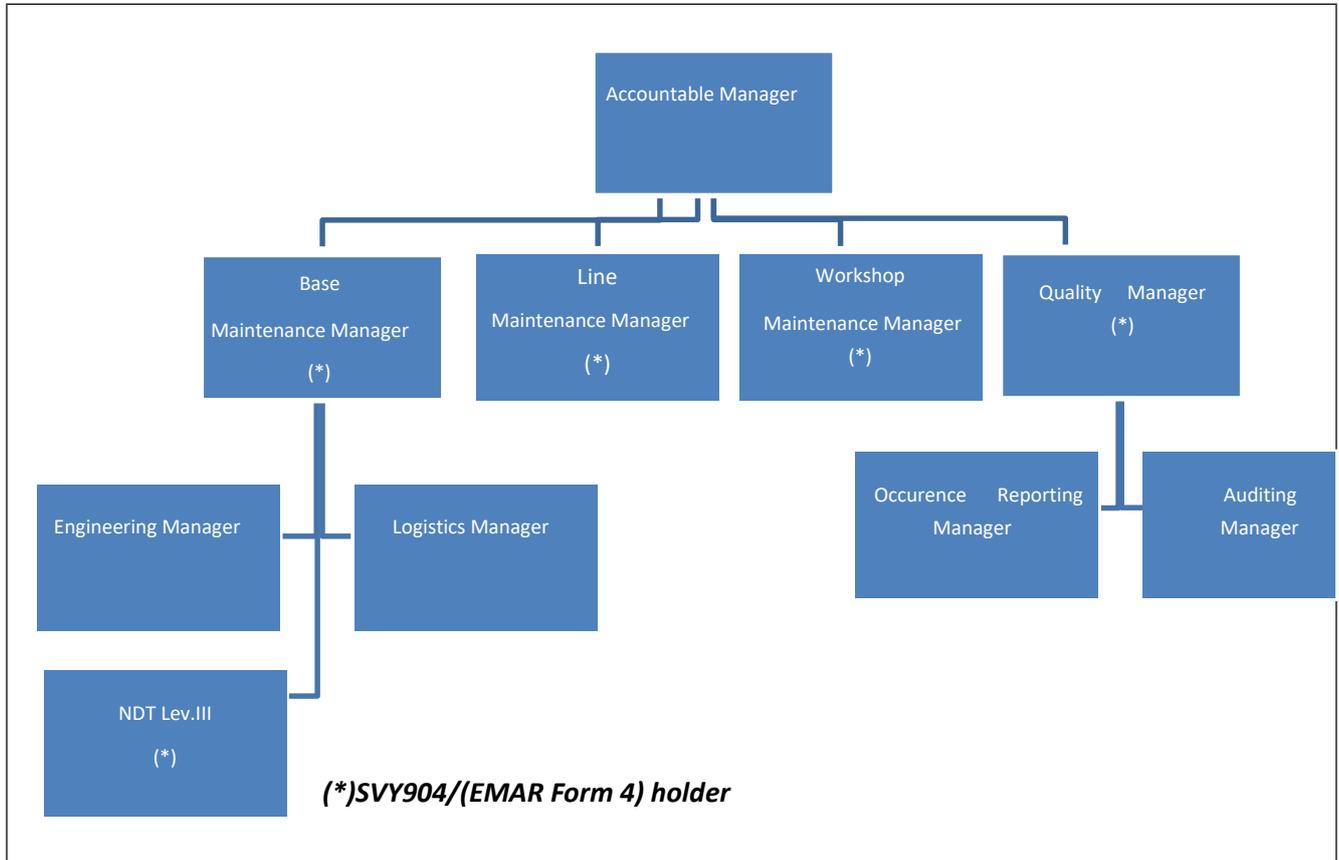
- He/she is responsible for ensuring that the applicable NDT requirements (e.g. SIM-To-Lt-031 145.A.30 (e), EN 4179, etc.) are met and to act on behalf of the maintenance organisation in this area;

### **1.5 Management organisation chart.**

The maintenance organisation chart shall show the associated chains of responsibility of the "nominated persons" identified in Chapter 1.3. When other "Managers" are identified in chapter 1.3 they need also to be

reflected in the maintenance organisation chart to show that they report ultimately through a “nominated person” to the Accountable Manager.

The following is an example of an SIM-To-Lt-031 AMO structure:



The SVY904 (EMAR Form 4) positions shall be clearly identified in the chart. The names of the management personnel may be included in the boxes of the maintenance organisation chart but this is optional.

Quality Assurance personnel (i.e. quality auditor) must be shown to be independent from the Maintenance Managers.

Certifying staff may report to any of the managers specified depending upon which type of control the approved maintenance organisation uses

**1.6 List of certifying staff and support staff.**

**1.6.1 Content of the list(s).**

This chapter should contain a list of all certifying staff authorised within the maintenance organisation. This paragraph may be cross referenced from another record (including a computer record) where the list of the names is kept. The intention of this chapter is that the maintenance organisation maintains a complete up-to-date record of all certifying staff and that it be provided to the FIMAA with the MOE when requesting initial or amended approval or on request by FIMAA staff.

- a) Base Maintenance:
  - Category C Certifying Staff
  - Category B1/B2 Support Staff
- b) Line Maintenance:
  - Category B1 Certifying Staff
  - Category B2 Certifying Staff
  - Category A Certifying Staff
- c) Component Certifying Staff
- d) Specialised Services Certifying Staff

Where this list is cross referenced from a separate record, the source of the record should be identified/referenced. The list should include at least the following information:

- a) Name
- b) Rank/Grade and Service Number (if applicable)
- c) Date of Birth
- d) Basic Training
- e) Military Aircraft Type Training/Task Training
- f) Continuation Training
- g) Experience
- h) Qualifications relevant to the authorisation
- i) Scope of the authorisation
- j) Date of first issue of the authorisation
- k) If appropriate – expiry date of the authorisation
- l) Identification Number of the authorisation
- m) Security clearance (where applicable).

### **1.7 Manpower resources.**

The numbers of personnel shall be provided so that a clear picture of the adequacy of staffing levels can be demonstrated without the need for amendment as a result of routine fluctuations. The

system must however, be able to highlight any significant re-deployment or loss of staff. The system shall also address the numbers of specialist staff in each department (as applicable).

**1.7.1 Base Maintenance / Component Maintenance.**

- Maintenance - Aircraft / Workshops
- Engineering
- Technical Services
- Planning
- Administration
- Quality Dept.
- Quality Audit
- Etc

**1.7.2 Line Maintenance.**

- Maintenance
- Engineering
- Technical Services

**1.7.3 Specialised Activities.**

- Technical Services

**1.7.4 Contracted / Tasked Service.**

- Full Time
- Part Time

The maintenance organisation must be able to demonstrate that they have adequate re-sources to justify the grant of an approval as defined in chapter 1.8 (facilities to be approved) and 1.9 (scope of work). The system used must be presented in sufficient detail to explain the support at each site and for each function as required by SIM-To-Lt-031 145.A.30 (d).

The maintenance organisation shall not declare a percentage of staff used under this approval but the number of staff needed to comply with SIM-To-Lt-031 requirements.

In any case the maintenance organisation shall ensure the number of staff declared in this MOE and the latest application SVY902 (EMAR Form 2) remains consistent.

## **1.8 General description of the facilities at each address intended to be ap-proved.**

This section shall describe each of the facilities, in some detail, at which the maintenance organisation intends to carry out maintenance. This shall provide a clear picture of what the FIMAA is being asked to approve. All sites shall be covered; however, a different emphasis can be placed on sites dependent on the level of work undertaken.

The system of protection against weather, dust and other airborne contaminants (paint, smoke...), ground water protection, heating/air conditioning, lighting, noise protection, safety system (limited accesses, fire, staff security...) should be described either in the diagram or in the associated text.

### **1.8.1 Maintenance organisation principal place of business /Headquarters.**

This is the head office/registered office/Headquarters of the maintenance organisation within which the principal financial/resource functions and operational control of the activities referred to in SIM-To-Lt-031 are exercised.

It is the address which will be included in the SVY903 (EMAR Form 3) approval certificate together with the main base sites address(es).

### **1.8.2 Postal (surface mail and e-mail) address.**

The postal address of the maintenance organisation to be used by the FIMAA for formal mail communication needs to be clearly identified. This should be the same as that used on the SVY902 (EMAR Form 2).

In addition, to ensure an efficient and stable communication channel between the FIMAA and the maintenance organisation, the organisation shall create a "generic" email address (without reference to a family name) to be used regardless any future personnel changes.

### **1.8.3 Base maintenance facilities.**

- Hangar accommodation
- Aircraft access equipment / platforms / docking
- Specialised workshops
- Environmental provisions
- Office accommodation for: (planning, technical records, Quality, technical reference area, etc)
- Storage

**1.8.4 Line maintenance facilities (at each location) as appropriate.**

**1.8.5 Engines / APU and Component maintenance facilities.**

**1.8.6 Layout of premises.**

Where the accommodation is not owned by the maintenance organisation, as in the case of a hangar where space is rented or shared, proof of tenancy/access may be required, and the FIMAA may wish to have this included in an Appendix or Supplement to the MOE.

In accordance with AMC 145.A.25 (a), for line maintenance of aircraft, access to hangars may be required. In this case access to a suitable hangar shall be demonstrated, particularly in the case of inclement weather for minor scheduled work and lengthy defect rectification.

Note: Hangar utilisation is expected to be in the MOE chapter 2.22, due to relation with the man-hour plan.

**1.9 Organisations intended scope of work.**

This chapter must show the range of work carried out at each approved site. When a maintenance organisation is performing maintenance in multiple locations the corresponding scope of work shall additionally be detailed for each site. This shall also relate to chapters 1.8 & 5.3 in such a way that it can be clearly seen which specific tasks are performed at each location.

SIM-To-Lt-031 Appendix 1. Table 1 should be used as a guide for the information re-quired for each location for which approval is being sought.

**1.9.1 Aircraft maintenance.**

Example:

CLASS	RATING	LIMITATION	BASE	LINE
AIRCRAFT	A1 Aeroplanes/ above 5 700 kg	[State aeroplane manufacturer or group or series or type and/or the maintenance task(s)]  e.g. A400M-180, C130J,...	[YES/ NO]*	[YES/ NO]*
	A2 Aeroplanes/ 5 700 kg and below	[State aeroplane manufacturer or group or series or type and/or the maintenance tasks]	[YES/ NO]*	[YES/ NO]*

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	A3 Helicopters	[State helicopter manufacturer or group or series or type and/or the maintenance task(s)] e.g. EC 665 HAP Tiger, NH90-NFRS,...	[YES/ NO]*	[YES/ NO]*
	A4 Aircraft other than A1, A2 and A3	[State aircraft series or type and/or the maintenance task(s)]	[YES/ NO]*	[YES/ NO]*

Note: If information on Type/Model/Series exists on an aircraft (M)TC, then this information is to be used in the column 'limitation'.

**1.9.2 Engine maintenance.**

Example:

CLASS	RATING	LIMITATION
ENGINES/APU	B1 Turbine	[State engine series or type and/or the maintenance task(s)] e.g. TURMO III C4, TURBOMECA RTM 322-01/9,...
	B2 Piston	[State engine manufacturer or group or series or type and/or the maintenance task(s)]
	B3 APU	[State engine manufacturer or series or type and/or the maintenance task(s)] e.g. Noëlle 180 (Mirage 2000)

Note: 'Limitations' should state the engine Type/Model/Series (as stated on engine (M)TC if applicable), together with the maintenance tasks. The mention of the aircraft on which the engine/APU is fitted should be precised.

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**1.9.3 Component maintenance.**

This section shall specify the component manufacturer or the particular component and/or cross refer to a referenced capability list. The part number and the level of work performed shall be included.

Example:

<b>CLASS</b>	<b>RATING</b>	<b>S1000D CHAPTER REFERENCE <sup>1</sup></b>	<b>LIMITATIONS</b>  (aircraft type, component, manufacturer)
COMPONENTS  other than complete engines or APU's	C1 Air Cond & Press	21	
	C2 Auto Flight	22	
	C3 Comms and Nav	23-34-43	
	C4 Doors — Hatches	52	
	C5 Electrical Power & Lights	24-33-91	
	C6 Equipment	25-38-45-50	
	C7 Engine — APU	49-71-72-73-74-75-76- 77-78-79-80-81-82-83- 86	
	C8 Flight Controls	27-55-57.40-57.50- 57.60-57.70	
	C9 Fuel — Airframe	28-48	
	C10 Helicopter — Rotors	62-64-66-67	
	C11 Helicopter — Trans	63-65	
	C12 Hydraulic Power	29	
	C13 Indicating - recording system	31-46	
	C14 Landing Gear	32-90	

<sup>1</sup> S1000D Chapter Reference: in conformity with "S1000D Main System Breakdown"

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	C15 Oxygen	35-47	
	C16 Propellers	61	
	C17 Pneumatic & Vacuum	36-37	
	C18 Protection ice/ rain/fire	26-30	
	C19 Windows	56	
	C 20 Structural	53-54-57.10-57.20- 57.30	
	C 21 Water Ballast	41	
	C 22 Propulsion Augmentation	84	
	C 51 Attack systems	39-40-42	
	C 52 Radar / Surveillance	92-93	
	C 53 Weapons systems	94	
	C 54 Crew escape & Safety	95	
	C 55 Drones/Telemetry	96-00, 96-30, 96-40	
	C 56 Reconnaissance	97-98	
	C 57 Electronic warfare	99	

Note: 'Limitations' should state the component and its part number, together with the maintenance tasks.

When a maintenance organisation is managing a separate "capability list" the information addressed above shall be mentioned in this list. In this case the chapter 1.9 shall only address the rating, the S1000D and shall refer to the capability list reference (see example below).

CLASS	RATING	S1000D CHAPTER REFERENCE <sup>2</sup>	LIMITATIONS

<sup>2</sup> S1000D Chapter Reference: in conformity with "S1000D Main System Breakdown"

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			(aircraft type, component, manufacturer)
COMPONENTS  other than complete engines or APU's	C1 Air Cond & Press	21	Components in accordance with the capability list reference XXXX
	C2 Auto Flight	22	
	C3 Comms and Nav	23-34-43	
	C4 Doors — Hatches	52	

This list, whatever included to or separated from the basic MOE, is an integral part of the approval.

#### 1.9.4 Specialised services maintenance.

##### 1.9.4.1 NDT with D1 Rating.

When the maintenance organisation intends to perform NDT tasks and release such tasks using an EMAR Form, the rating D1 is necessary. Under the D1 rating, the capability to perform maintenance is determined by the “NDT method” listed in the approval schedule, regardless the specific aircraft, engine or component which is subject to the inspection method.

Example:

CLASS	RATING	LIMITATION [State particular NDT method(s)]
SPECIALISED  SERVICES	D1 Non-Destructive  Testing	Penetrant testing (PT)
		Magnetic testing (MT)
		Eddy current testing (ET)
		Ultrasonic testing (UT)
		Radiographic testing (RT)
		Thermographic testing (TT)
		Shearographic testing (ST)

##### 1.9.4.2 NDT without D1 Rating (“in the course of maintenance”).

When the maintenance organisation intends to perform NDT tasks under another approved rating (e.g. as part of the maintenance carried out on aircraft under rating A1, engines under rating B1, components under a C rating) the NDT tasks are considered done in the “course of maintenance”.

In this case, even if the maintenance organisation does not need to hold a D1 rating, the various NDT methods applied during maintenance shall be listed in this paragraph for each approved location.

It has to be noted that the same SIM-To-Lt-031 Requirements in place for being approved under the D1 rating remain applicable.

**1.9.4.3 Arms, Munitions and Pyrotechnic Systems with D5 Rating.**

When the maintenance organisation intends to perform maintenance on arms, munitions and pyrotechnic systems and release such tasks using an EMAR Form 1 (SVY901), the rating D5 is necessary. These specialised services maintenance tasks shall be detailed for each approved location.

Example:

SPECIALISED SERVICES	RATING	LIMITATION [State arms type and maintained pyrotechnic systems]
	D5 Arms, Munitions and Pyrotechnic Systems Specific	

**1.9.4.4 Other specialised activities.**

- Each specialised maintenance task such as, but not limited to, composite repairs, painting, welding, machining, NDI, shall be detailed in this paragraph.
- These specialised services maintenance tasks shall be detailed for each approved location.

It has to be noted that those specialised maintenance tasks may need to be carried out under specific conditions (e.g. aircraft painting is considered to be a base maintenance task and therefore a base maintenance scope of approval is required in addition to listing such activity in this chapter).

**1.9.4.5 Maintenance away from the approved locations as per SIM-To-Lt-031 145.A.75 (c).**

- If applicable, this paragraph shall make reference to the fact that the maintenance organisation may perform works away from the approved locations, subject to the condition specified in MOE chapter 2.24 (Maintenance outside the approved locations).

**1.9.4.6 Parts fabrication as per SIM-To-Lt-031 145.A.42 (c).**

- If applicable, this paragraph shall make reference to the fact that the maintenance organisation may fabricate parts in the course of maintenance, subject to the condition specified in MOE chapter 2.9 (where the specific parts fabrication procedure is to be entered).

- The part fabrication is to be considered under an approved rating (e.g. as part of the maintenance carried out on aircraft under rating A1, engines under rating B1, components under a C rating).
- When the maintenance organisation is approved to fabricate a restricted range of parts for use in other facilities, the range of parts is to be listed together with the locations where they will be fabricated.

### **1.10 Notification procedure to the FIMAA regarding changes to the maintenance organisation's activities / approval / location / personnel.**

FIMAA approval is based on the management, organisation, resources, facilities and scope of work described in this Part 1 of the MOE. Any significant change may therefore affect the conditions under which the approval was granted. This chapter is intended to show the process to be used by the maintenance organisation to notify the FIMAA of any change affecting the approval.

#### **1.10.1 Notification.**

This part of the MOE must show how the company would go about notifying the FIMAA of the following changes:

1. The name of the AMO;
2. The main location of the AMO;
3. Additional locations of the AMO;
4. The Accountable Manager and all appointed deputies;
5. Any of the persons nominated under SIM-To-Lt-031 145.A.30(b) and their appointed deputies;
6. The facilities, equipment, tools, material, procedures, work scope or certifying staff that could affect the approval;
7. The ownership of the AMO or its parent company.

In addition, this procedure shall also detail:

- When to notify the change;
- How to notify the change (using the SVY902 (EMAR Form 2) or not);
- Who in the maintenance organisation is in charge of the notification.

### **1.10.2 Management of the change with the FIMAA.**

Once the change has been notified, the maintenance organisation shall detail how the related change is internally managed:

- Internal audit by the Quality system;
- Composition of the package associated to any of the above listed changes (e.g. SVY902 (EMAR Form 2), MOE, internal audit SVY904 (EMAR Form 4), etc.);
- Who in the maintenance organisation is in charge of monitoring the change with the FIMAA.

For change of approval applications, the maintenance organisation shall carry out an internal audit in accordance with its MOE chapter 3.1 audit procedure, prior to the audit by the FIMAA, confirming that processes, areas, activities and personnel subject to the application have been reviewed and audited showing satisfactory compliance with all applicable SIM-To-Lt-031 requirements. The relevant audit report together with a statement of compliance from the Quality Manager shall be provided to the FIMAA.

The requirement to have an internal audit carried out as part of any application for organisational change, shall be addressed in a procedure under this MOE 1.10 chapter.

## **1.11 MOE amendment procedures including, if applicable, delegated procedures.**

The Quality Manager is responsible for reviewing the MOE on a regular basis and amending if necessary, this includes the associated procedure manuals, and the submission of proposed amendments to the FIMAA. The MOE and associated documents and lists shall be amended as necessary to remain an up-to-date description of the maintenance organisation.

### **1.11.1 MOE amendment.**

This procedure shall at least address the MOE amendment procedure.

- Person responsible for amending the MOE.
- Definition of minor & major amendments to the MOE and related approval process.
- Definition of criteria for new issue and/or revision.
- The record of the SIM-To-Lt-031 approval certificate and approval of the MOE and subsequent amendment shall be described:
  - Approval letter from the FIMAA as applicable
  - SIM-To-Lt-031 approval certificate/ approval schedule amendments following the change of the scope of activity and/or change of the locations and/or a new issue of the MOE.

### 1.11.2 Associated procedures, lists and Forms.

The minimum procedures/lists to be considered are all those identified in SIM-To-Lt-031 145.A.70 (a), which are therefore integrally part of the MOE.

This procedure shall at least address:

- Summary table of associated procedures and lists:

Example:

Type of Document	Document reference	Indirect approval*	Approved by*	minor amendments to which the indirect approval is limited
Associated Procedures Manual**	APM	X	Quality Manager	Typing errors
Certifying staff and Support staff list	AMO-DOC-1		FIMAA	n/a
Workshop capability list	AMO-DOC-2	X	Quality Manager	removal of part numbers
List of contractors / tasked organisations	AMO-DOC-3	X	Quality Manager	addition /removal of a contractor / tasked organisation
List of Line Maintenance Locations	AMO-DOC-4		FIMAA	n/a
NDT Manual	AMO-DOC-5	X	NDT Lev.3 and Quality manager	n/a

\* When an indirect approval is granted, it is important that the chapter 1.11.3 describes the limits of the indirect approval privilege. Even if a document is subject to indirect approval, in the case of a change affecting the scope of work this document shall be approved by the FIMAA (i.e. amending the capability list to add a Part number belonging to a new C rating)

\*\* when the maintenance organisation develops second level procedures (for example to describe the details of maintenance processes in each area/workshop), those procedures shall be collected into a separate manual (e.g. associated procedures manual) to be also listed in this table.

- Definition of criteria for new issue and/or revision

### 1.11.3 Approval process

- Direct approval:

- The procedure shall at least describe the process to be followed to get the approval from the FIMAA.
  
- Indirect approval:
  - the list of documents for which an indirect approval privilege is granted shall be listed in the table provided in paragraph 1.11.2
  - for each of the above mentioned documents, the procedure shall at least include:
    - Definition of minor & major amendments. In particular, the limits of changes that can be indirectly approved for each document shall be limited to minor amendments (may be directly identified in the table provided in paragraph 1.11.2, refer to the example);
    - The person responsible for the internal approval of the related documents (may be directly identified in the table provided in paragraph 1.11.2, refer to the example);
    - The notification of such approval to the FIMAA;
    - The record of such indirect approval.

In case of minor amendment (of the MOE and/or associated procedures and lists) the Quality Manager may be delegated for indirect approval provided the appropriate procedure within this chapter 1.11 of the MOE is approved by the FIMAA. Such a delegation is to be based upon the ability of the Quality System to deal adequately with the SIM-To-Lt-031 requirements.

#### **1.11.4 List of applicable regulations and user guides**

This paragraph is optional and may be used to describe how the maintenance organisation ensures the MOE and associated procedures/lists remain updated with the current applicable regulations and user guides.

This paragraph is aimed to list the applicable regulations and user guides, together with their revision status, which have been considered for the development of the current revision of the MOE and associated procedures/lists.

The quality system is responsible for assessing any revision of the applicable regulations and user guides for possible impact on the maintenance organisation's procedures/lists and to amend them as necessary.

The MOE and associated procedures/lists are expected to be amended before the date of entry into force specified in the applicable regulation or user guide.

## **PART 2 – MAINTENANCE PROCEDURES.**

### **2.1 Supplier evaluation and contract / tasking control procedure.**

This chapter shall be clearly structured to cover all the cases where the maintenance organisation is using the services of other organisations.

#### **2.1.1 Type of suppliers.**

This chapter shall describe how the maintenance organisation identifies the suppliers from where to purchase serviceable necessary materials, standard parts and components to carry out maintenance. A “list of suppliers” shall be developed under the control of the Quality Department.

Suppliers of tools and tools calibrations services shall be described in the MOE chapter 2.4.

- Suppliers of materials, standard parts, components
  - Sources of supplies (e.g. military supply system, constructor, original manufacturer (OEM), distributor approved by the manufacturer, retailer, operating organisation, ...)
  - Types of items (e.g. components, consumables, standards, materials, ...)

This paragraph shall describe how the maintenance organisation may contract/task part of the maintenance to another AMO as per SIM-To-Lt-031 145.A.70 (a)16. All such contracted/tasked organisations shall be listed in the MOE chapter 5.4.

- Contracted/tasked organisations
  - Sources of services (e.g. AMOs and their related approved ratings)
  - Types of services (e.g. specialised work, line maintenance, component maintenance, ...)

#### **2.1.2 Monitoring the suppliers.**

For each category of supplier identified in the previous chapter, the related monitoring and approval process shall be described.

The acceptance and monitoring process of suppliers shall comply with AMC 145.A.75 (b).

- Initial nomination of suppliers and contracted/tasked organisations:
  - Selection processes;
  - Internal acceptance process;
  - Issuance of the internal authorisations (e.g. scope of authorisation, validity, ...);
  - Producing the list of suppliers, contracted/tasked organisations;

- Internal distribution of the list – access / authorisation of computerised list.
- Monitoring of the list of suppliers and, contracted/tasked organisations versus internal authorisation:
  - Incoming inspection results, audit results, possible internal limitation...;
  - Assessment of the service provided;
  - Updating of the list;
  - Withdrawal of the internal authorisation, when applicable.
- Management of the purchase orders according to the nominated suppliers and contracted/tasked organisations.
- Records of suppliers, contracted/tasked organisations information:
  - Files;
  - Duration / location;
  - Type of documents (Certificates, audit reports, list of suppliers, incoming inspection results, ...).

## 2.2 Acceptance / inspection of aircraft components and materials.

### 2.2.1 Component / Material certification.

This chapter is to identify the release documents to be expected/accepted for each type of component/material depending on their status (new/used). It is recommended to develop a table listing all the cases, for easy reference to receiving inspection personnel.

- New components

<b>STATUS "NEW"</b>	
<b>type of part/material</b>	<b>document to be expected</b>
standard parts	

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<p>materials (raw materials and/or consumables)</p>	<p><u>Option 1</u>: when the standard part/material is purchased directly from the manufacturer, the Certificate of Conformity issued by the manufacturer is expected;</p> <p><u>Option 2</u>: when the standard part/material is purchased thru a third-party supplier (i.e. distributor, operating organisation, maintenance organisation, etc.) the documentation accompanying the standard part/materials shall contain:</p> <ul style="list-style-type: none"> <li>• Conformity certification to the standard part/material applicable standard/specification, and;</li> <li>• identification of the manufacturing source, and;</li> <li>• Identification of the supplier source.</li> </ul> <p>For Option 2, the information above may be included in one single Certificate of Conformity issued by the supplier (containing cross reference to the manufacturer CoC) or be composed by more documents, such as for example the CoC issued by the manufacturer plus a statement from the supplier source.</p> <p>In any case, the manufacturer CoC shall be made available upon request.</p>
<p>aircraft components</p>	<p><u>Option 1</u>: EMAR Form 1 (SVY901);</p> <p><u>Option 2</u>: EASA Form 1 (not originating from an EASA Part M Subpart F approved organization).</p> <p><u>Option 3</u>: A national equivalent document recognized by the FIMAA as declaring an item's serviceability and airworthiness.</p>

- Used components

<b>STATUS "USED"</b>	
<b>type of component / material</b>	<b>document to be expected</b>
aircraft components	<p><u>Option 1</u>: EMAR Form 1 (SVY901);</p> <p><u>Option 2</u>: EASA Form 1 (not originating from an EASA Part M Subpart F approved organisation).</p> <p><u>Option 3</u>: A national equivalent document recognized by the FIMAA as declaring an item's serviceability and airworthiness.</p> <p><u>Option 4</u>: A release document issued by an organisation accepted by the FIMAA.</p>

- Depending on the type of components the maintenance organisation shall additionally describe the specific requirements applicable to Life Limited parts, used components, etc.

### 2.2.2 Receiving inspection procedure.

- Incoming inspection For Components / Materials/ Standard Parts received from external sources:
- Required documentation
  - Compliance with purchase order / item condition
  - Conformity with maintenance organisation requirements (e.g. type of release requested, sources of requirements)
  - Identification of components/material after receiving inspection (e.g. tagging)
  - Materials/standard parts received in batches and related traceability (e.g. splitting of batches)
  - Traceability of components and materials to the related documentation (e.g. internal tracking number)
  - Receiving inspection records

- "Quarantine" procedure
  - Modification Standard and AD compliance
  - Identification of storage limitation/ life limits
- Acceptance and incoming inspection of components from internal sources (e.g. transfer between stores, from the workshops):
- Conformity with maintenance organisation requirements
  - Records
  - Required documentation
  - Compliance with purchase order, condition
  - "Quarantine" procedure
  - Identification of storage limitation/ life limits
- Acceptance and incoming inspection of internal fabricated parts in accordance with AMC 145.A.42 (c) 9.
- Acceptance and incoming inspection of serviceable components removed from aircraft.
- Acceptance of components received in 'Aircraft On Ground' situations (these parts are often received directly at the grounded aircraft location and dedicated procedures need to be in place).

### **2.2.3 Installation of components / parts / materials**

- Procedure for verification by the installer prior to installation of components/parts and prior to use materials on an aircraft or component
- Verification of satisfactory condition and appropriate document for installation of any aircraft component
  - Verification that, a component is eligible to be fitted when different modification and/or airworthiness directive configuration may be applicable
  - Verification of standard parts on an aircraft or component (i.e. traceability, applicable standard as per maintenance data requirement)
  - Verification prior to use any raw or consumable material on an aircraft or component (i.e. due dates, applicable specification as per maintenance data requirement)"

### **2.3 Storage, tagging and release of aircraft components and materials to aircraft maintenance.**

- Procedures for maintaining satisfactory storage conditions (including segregation) of:
- Aircraft components

- Perishables, raw material
- Flammable fluids
- Engines
- Bulky assemblies
- Record of position in the store (s)
- Etc.
- System and procedure to control shelf life / life limit and modification standard.
- Special storage requirements (condition and limitation) e.g.: Electrosensitive devices, rubber.
- Tagging / labelling system and storage areas:
  - Serviceable components /material
  - Unserviceable components /material
  - Unsalvageable components (see SIM-To-Lt-031 145.A.42(d))
  - Quarantine
  - Batch number
  - Scrap (etc.)
- Issue of components, standard parts and materials, to the maintenance process (control, identification, batch segregation).
- Deployed operations.
- Access to storage facilities restricted to authorised personnel

The storage condition and the storage limitation must be based upon manufacturer specifications.

#### **2.4 Acceptance of tools and equipment.**

This chapter shall describe the procedures for the acceptance of new, maintained, modified, calibrated tools/ equipment received and also the loaned/ hired tooling. It could also specify (as for chapter 2.1) the assessment processes of tooling suppliers and the control of contracted/tasked organisations carrying out maintenance services on tooling:

- Tools and equipment acceptance procedure:
  - Sources
  - Conformity with maintenance organisation requirements (e.g. certification, ...)
  - Records

- Incoming inspection for tools:
  - Required documentation
  - Compliance with purchase order / condition of the tool
  - "Quarantine" procedure
  - Internal identification
  - Verification of necessary control / calibration
  - Verification of necessary control / calibration
  
- Monitoring of tool maintenance service suppliers:
  - Selection processes for each type of supplier
  - Internal authorisation processes for each type of supplier and contracted/tasked organisation
  - Monitoring of the internal authorisations (e.g. scope of authorisation, validity,...)
  - Withdrawal of the internal authorisation

Note: A list of tool related service providers (inspection /servicing/ calibration) has to be established and amended under the control of the Quality System.

## **2.5 Calibration of tools and equipment.**

This chapter shall describe all the procedures related to the controls, revisions, modifications, checking and calibrations of the tools/ equipment:

- Inspection, servicing and calibration programme / equipment and calibrated tool register.
- Establishment of inspection, servicing and calibration time periods and frequencies.
- Person/ department responsible for the calibration programme, the register, the follow-up, time period and frequencies (link between departments if necessary).
- Identification of servicing / calibration due dates.
- Management of loaned calibrated tools / equipment.

## **2.6 Use of tooling and equipment by staff (including alternative tools).**

This chapter shall describe all management procedures for tooling, distribution and re-turn of the tooling after use:

- Distribution of tools:

- record of user
  - location of use
  - Verification of A/C or component is clear of all tools after completion of maintenance
- 
- Determining tool serviceability prior to issue.
  - Training and control of personnel in the use of tools and equipment (records of training).
  - Loan tool control and audit.
  - Control of alternative tools:
    - Demonstration of equivalence between design/manufacturing data of alternative tools and the data/features of the tools recommended in the maintenance data of the manufacturers
    - In-house identification rule of alternative tools (P/N, S/N)
    - Alternative tools validation process
    - Register of alternative tools /tagging/relation between the references of original tools and alternative tools
    - Treatment of possible changes of maintenance data according to the new references of alternative tooling (modifications limited to the references of the tooling to be used and/or adaptation of maintenance data regarding alternative tooling)
    - Use, storage and maintenance manuals associated with the alternative tools (if applicable)
    - In-house approval of each alternative tooling before being used
    - Storage of the records of alternative tooling

## **2.7 Cleanliness standards of maintenance facilities.**

- Organisation of the cleaning of the facilities:
  - "Foreign Object" exclusion programme
  - Cleaning programme
  - Individual responsibilities
  - Timescales
  - Waste material disposal
  - Special procedure for some facilities (e.g. painting, white room, parts cleaning, etc)

- Segregation of facilities to prevent cross contamination

## **2.8 Maintenance instructions and relationships to aircraft / aircraft component manufacturer's instructions including updating and availability to staff.**

This chapter shall describe the management of all the technical documentation in use within the maintenance organisation.

This chapter shall be structured to clearly identify the various types of documentation in use (both of external and/or internal origin), to be controlled by the maintenance organisation in order to perform the intended scope of work. The documentation may be divided in two main groups:

### **2.8.1 Maintenance data coming from external sources.**

This paragraph needs to identify that the applicable maintenance data is used as defined in 145.A.45 (b). coming from external sources such as (M)TCH, (M)STC holders, the FIMAA (e.g. instructions for continuing airworthiness, AD, SB, etc.);

- Control of information:
  - Technical library
  - Subscriptions control
  - Information held / needed regarding the scope of work
  - Issue / amendment control
- Technical information amendment procedures:
  - Manuals
  - Service Information (AD, SB, etc.)
  - Distribution: access to the staff
- Control of customer supplied maintenance data (refers also to Chapter 2.13).

### **2.8.2 Documentation / maintenance instructions issued by the maintenance organisation.**

This chapter needs to identify and describe the objective and management of the documentation issued by the maintenance organisation itself, as for example:

- Modification of maintenance instructions by the maintenance organisation as defined in SIM-To-Lt-031 145.A.45 (d) as applicable;

- Maintenance instructions issued in conformity to approved data as per SIM-To-Lt-031 145.A.45 (e) in order to facilitate/customise the maintenance (e.g. work card/work sheet, engineering orders, technical specifications, etc.) as applicable (refers also to Chapter 2.13);
- Documentation issued for internal information purposes (e.g. quality in-formation bulletins, quality alerts, occurrence investigation reports, etc.) as applicable;
- Control of information:
  - Technical library
  - Information held / needed regarding the scope of work
  - Issue / amendment control
- Verification and validation of new procedures where practicable;
- Incorporation of best practice and human factors principles;
- Incorporation of Fuel Tank Safety concept on maintenance documentation (Job Instruction Cards etc.);
- Incorporation of CDCCL concept (where applicable):
  - compliance with CDCCL instructions
  - traceability of CDCCL completion
- Awareness of Technical Publications, Instructions and Service Information by the staff.

## **2.9 Repair procedures.**

### **2.9.1 Repairs.**

This chapter is intended to describe how the maintenance organisation is performing repairs on aircraft/components/engines according to already available maintenance data and how it is managing the repairs not described in the manufacturers' documentation.

It has to be noted that the privilege given by SIM-To-Lt-031 145.A.45 (d) in order for the maintenance organisation to develop modified maintenance instructions (as described in previous MOE chapter 2.8), is excluding the engineering design of repairs and modifications.

Maintenance procedures shall be established to ensure that damage is assessed and modifications and repairs are carried out using data specified in SIM-To-Lt-036 M.A.304.

- Repairs according to already available maintenance data:
  - Repairs In accordance with AMM, SRM, CMM etc.
  - Sources of repair approval as per SIM-To-Lt-036 M.A.304
  - Repairs already approved by the TC Holder

- Internal process in use and forms to manage the repairs
- Repairs requiring a new approval (not already included in the available maintenance data):
  - Sources of repair approval as per SIM-To-Lt-036 M.A.304
  - Acceptance of minor/major repairs approvals (it is recommended to develop a table listing the various case)
  - Work order
  - internal process in use and forms to manage the repairs
  - Maintenance instruction (job cards,...)
- Control of the scope of work versus the requested repair (limitations and conditions).

### **2.9.2 Fabrication of parts.**

A maintenance procedure shall be established to address requirements of SIM-To-Lt-031 145.A.42 (c) and its associated AMC.

If this chapter is used/is applicable, the parts fabrication permission shall also be specified in the MOE chapter 1.9 “scope of work”.

### **2.10 Aircraft Maintenance Programme compliance.**

This chapter shall refer to the aircraft, engines and component maintenance programmes (scheduled tasks, inspections, adjustment, tests, and replacement of component/life limited parts...).

This procedure is aimed to explain how the maintenance organisation intends to comply with Appendix I to AMC M.A.302 and AMC M.B.301(b) paragraph 6.4.

- Qualification and experience required to demonstrate appropriate expertise
- Details about the contract with the CAMO
- Delegated functions:
  - a) Developing the aircraft maintenance and reliability programme,
  - b) Performing the collection and analysis of the reliability data,
  - c) Providing reliability reports, and
  - d) Proposing corrective actions to the CAMO.

More generally the procedure shall also detail how the maintenance organisation is providing adequate reporting to the CAMO:

- Maintenance programme variations

- Corrosion prevention and control programme reporting
- Structural Significant Items reporting
- Reliability reporting

### **2.11 Airworthiness Directives procedure.**

The follow up of Airworthiness Directives is the responsibility of the CAMO who must request their enforcement on the work order/tasking sent to the maintenance organisation. The maintenance organisation is then responsible for embodying the ADs which have been ordered/tasked.

It is necessary to differentiate between the activities of management / implementation of ADs on behalf of the CAMOs/operating organisation and that carried under the SIM-To-Lt-031 approval.

Only the AD related activities which concern the AMO tasks have to be described in the MOE, with particular reference to the following points.

- Identification of the responsibilities of the maintenance organisation with regards to ADs, such as but not limited to establishing compliance with the following:
  - SIM-To-Lt-031 145.A.42 “Acceptance of components” requires the maintenance organisation to ensure that the particular component is eligible to be fitted when different modification and/or airworthiness directive standards may be applicable. In order to comply with this requirement, the maintenance organisation shall demonstrate it has an adequate control on ADs applicable to components in their store(s), being able to demonstrate as a minimum:
    - Access to the relevant ADs;
    - When the airworthiness control of the components is directly ensured by the owner of the components, the maintenance organisation shall demonstrate that a contract is in place, attributing the responsibilities related to the ADs to such owner. This also applies to component(s) directly delivered by their owner to the line stations (SIM-To-Lt-031 145.A.75 (d) refers);
    - When the maintenance organisation retains control of the airworthiness status of the component(s) (i.e. the maintenance organisation owns the component), the maintenance organisation shall ensure that all applicable ADs are embodied to the components they have in store. The maintenance organisation shall employ qualified staff for the AD analysis, issuing internal work orders and performing the AD compliance follow-up.
  - SIM-To-Lt-031 145.A.45 “Maintenance data” requires the maintenance organisation to have access to and use applicable current maintenance data in the performance of maintenance, including modifications and repairs. This means the maintenance organisation shall demonstrate, as a minimum:
    - access to the relevant ADs;

- SIM-To-Lt-031 145.A.50(a) “Certification of Maintenance” requires to issue a Certificate of Release to Service when it has been verified that “..... and that there are no non-compliances which are known to endanger flight safety”. This means that the maintenance organisation shall demonstrate, as a mini-mum:
  - access to the relevant ADs;
  - a procedure to ensure that a CRS is only issued when there is no non-compliance which is known to endanger flight safety (i.e. the maintenance organisation is aware of an overdue Air-worthiness Directive applicable to the product/component being maintained).
- Maintenance organisation policy:
  - Studying ADs according to the scope of work of the maintenance organisation;
  - Selection of ADs according to the scope of work of the maintenance organisation;
  - Recording of applicable ADs according to the scope of work of the maintenance organisation;
  - Determining internal or external ADs embodiment (linked to the scope of work).
- Accomplishment of ADs via work orders specifying the status of the document to be used.
- Awareness that the associated maintenance data contained within the AD is mandatory.
- Identification of the mandatory requirement in the maintenance documentation.

## **2.12 Optional modification procedure.**

This chapter shall refer to the modifications to be embodied on the air-craft/components/engines. It has to be noted that the privilege given by SIM-To-Lt-031 145.A.45 (d) in order for the maintenance organisation to develop modified maintenance instructions (as described in previous MOE chapter 2.8), excludes the engineering design of repairs and modifications.

Maintenance procedures shall be established to ensure that damage is assessed and modifications and repairs are carried out using data specified in SIM-To-Lt-036 M.A.304.

- Maintenance organisation policy:
  - Sources of modification approval as per SIM-To-Lt-036 M.A.304;
  - Internal process in use and forms to manage the modifications;
  - Modification including embodiment of (M)STCs.
- Control of the scope of work (limitations and conditions).

The embodiment of the Optional Modifications is the responsibility of the operating organisation/CAMO who will detail their embodiment on the contract/tasking sent to the maintenance organisation.

### **2.13 Maintenance documentation in use and completion of same.**

This chapter shall refer to the creation of a standard work file and how to complete the work documents/work cards making up these files. Specific instructions from manufacturer maintenance data related to CDCCL shall be considered.

It is recommended to structure this chapter in three separate paragraphs as indicated below. Clear differentiation is expected for each individual rating in the scope of work (e.g. aircraft, engines, components, specialised services).

#### **2.13.1 Conception and update of the template.**

This procedure shall identify the process of issuing and updating templates for the documents to be used during maintenance.

- Conception / validation of a template
- Identification of the templates needed
- Analysis and implementation of manufacturer data revisions
- Revision of the template

#### **2.13.2 Maintenance documentation in use.**

This procedure shall identify all the internal documents used for recording maintenance and making the complete work package.

- List of maintenance documents which build up a standard work package (e.g. front page with general information, list of tasks required, work cards, associated work orders, expected CRS...)
- Assembly of work packages for issue to maintenance activity
- Worksheets for non-routine tasks
- Assembly of completed work package for certification
- Control and use of customer supplied work cards/worksheets

#### **2.13.3 Completion of maintenance documentation.**

This procedure shall describe the completion of each of the documents identified in the previous paragraph. This may be done by reference to MOE chapter 5.1 where the related sample document is included together with its related completion instructions. This procedure shall detail:

- Process of declaring a task not applicable including conditional tasks
- Process of recording test results and dimensions
- Process of recording materials/components replaced together with the related traceability to the accompanying documents
- Record and management of additional works
- Record and management of deferred maintenance
- Process to correct a maintenance record imperfectly/incorrectly entered during the performance of maintenance
- Worksheet / work card completion and maintenance / independent
- inspection sign-off Use of personal stamps
- Procedure for recording calibrated tool / equipment used in maintenance tasks

This procedure shall also clarify the process of task sign-off<sup>3</sup>, depending on the various situations (e.g. sign-off of a normal task, of a task requiring an independent inspection, with a person on training, etc.) and depending upon the job descriptions identified within the maintenance organisation's MOE (e.g. certifying staff/support staff in MOE chapter 3.4, qualifying maintenance personnel in MOE chapter 3.8, qualifying supervisors in MOE chapter 3.7, etc.).

The procedure shall clearly indicate when a task is to be considered signed-off and by which means (e.g. use of personal stamp, use of signature, combination of stamp plus signature, etc.).

- The use of a summary table for tasks-sign off is recommended

All the personnel "authorised"<sup>4</sup> by the maintenance organisation to sign off tasks shall be identified (e.g. by reference to a separate personnel list).

Consistency of this paragraph shall be ensured with the job descriptions introduced in the other MOE chapters (e.g. 3.4, 3.7, 3.8, 3.11).

## 2.14 Technical records control.

- System for control, storage conditions (e.g. is there a fire extinguisher system, fire detection, etc...) and retrieval of records (paper or computer based)
- Control of access to records (paper and / or computer-based records)

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<sup>3</sup> A "sign-off" is a statement by the competent person performing or supervising the work, that the task or group of tasks has been correctly performed. A sign-off relates to one step in the maintenance process and is therefore different from the release to service of the aircraft

<sup>4</sup> "Authorised personnel" means personnel formally authorised by the maintenance organisation approved under SIM-To-Lt-031 to sign-off tasks. "Authorised personnel" are not necessarily "certifying staff".

- Record-keeping systems
- Lost or destroyed records (reconstruction and FIMAA acceptance)
- Provision of records to operator
- Retention of records:
  - Periods
  - Methods
  - Security

### **2.15 Rectification of defects arising during base maintenance.**

New defects or incomplete maintenance work orders identified during maintenance shall be brought to the attention of the CAMO for the specific purpose of obtaining agreement to rectify such defects or completing the missing elements of the maintenance work order.

In the case where the CAMO declines to have such maintenance carried out, EMAR 145.A.50 (e) is applicable in order to issue the Release to Service for aircraft (with deferred maintenance), as addressed in MOE chapter 2.16.

- Base maintenance procedure:
  - Records of base maintenance defects
  - Sign-off of base maintenance defects
- Analysis of defects and rectification
- Notification process (when necessary) to the CAMO, (and FIMAA in case of doubt – AMC 145.A.50(e) para 2 refers)
- Report to the CAMO
- Approval of the CAMO to launch the rectification according to the contract

Incorporation of standard defect rectification in work files, records, their control, release certificate and information to the contracting/tasking organisations are to be dealt with in MOE chapters 2.13, 2.14, 2.16, 2.17.

### **2.16 Release to Service procedure.**

Clear differentiation is expected for each different rating in the scope of work (e.g. aircraft, engines, components, specialised services). The release to service procedure shall at least address the following issues:

- Definition of the CRS statement
- Issuance and completion instruction of CRS after:

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- Base Maintenance (e.g. Maintenance Release Certificate);
- Line Maintenance;
- Engines/components/specialised services maintenance (EMAR Form 1).
- Cross-reference to work orders (initial work order, additional works, ...) to ensure that all the tasks ordered have been performed
- Minimum information to be contained in the certificate of release to service:
  - Basic details of the maintenance carried out (by reference to the maintenance data and related revision status, plus any eventually associated work orders or job card as applicable to the product or component being maintained) ; and
  - The date such maintenance was completed; and
  - The location where the release to service is issued; and
  - The identity of the maintenance organisation and person issuing the release to service, including:
    - the approval reference of the maintenance organisation; and
    - the SIM-TO-LT-031 AMO C/S - S/S individual authorisation number/references of the certifying staff issuing such a certificate;
- Issuance of a CRS with limitations/incomplete work as per 145.A.50 (e) (e.g. maintenance organisation not in condition to complete all the maintenance ordered, deferred maintenance, CAMO acceptance)
- Impossibility to sign a release certificate that could hazard flight safety e.g.:
  - AD owed and not enforced;
  - Work carried out not in accordance with the approved data;
  - Discrepancies that may have consequences on the airworthiness of the aircraft/ component/engine
- Issuance and completion instruction of CRS in the following specific cases, if applicable:
  - One-off authorisation (note: the MOE chapter 3.4 specifies the related qualification requirement);
  - Maintenance Away from the Approved Location(s) as per 145.A.75 (c) (note: the MOE chapter 2.24 specifies the related conditions).
- Release to service for components removed serviceable from aircraft (AMC 2 145.A.50 (d)):
  - Issuance of an EMAR Form 1 for components removed serviceable from FIMAA registered A/C;

- Swap/change over serviceable components between FIMAA registered A/C or between different positions of the same FIMAA registered aircraft; A component removed serviceable shall be released to service following the specific procedures included in MOE chapter 2.16 before being installed in another position;
- Issuance of an EMAR Form 1 (SVY901) for components removed serviceable from a non FIMAA registered A/C.
  
- Temporary fitting an aircraft component without appropriate release certificate in AOG condition (e.g., agreement of the CAMO, acceptable certificate, checking the status of the component, technical log record, corrective action when the aircraft returns to its Main Operation Base...)
- The specificities of EMAR Form 1 (SVY901):

This procedure shall at least address the following issues:

- The address to be recorded in the EMAR Form 1 (SVY901) block nr. 4 is either the address of the SIM-To-Lt-031 EMAR 145 AMO which is reflected in the first page of the SVY903 (EMAR Form 3) certificate or the address where the maintenance was performed. However, to allow the identification of the maintenance site where the EMAR Form 1 (SVY901) is issued (in the case where, in particular, this address is different from the one in the SVY903 (EMAR Form 3)EMAR Form 3), the maintenance organisation shall ensure a system is in place to retrieve the information of the maintenance site where the EMAR Form 1 (SVY901) was issued, starting from the tracking number of the EMAR Form 1 (SVY901) (block nr. 3);
- The tracking numbering/references system of EMAR Form 1 (SVY901) shall be described demonstrating a unique number/reference is used;
- An identification system shall enable to track the location where the maintenance has been released to service;
- The recording system allowing to easily retrieve all the issued EMAR Form 1 (SVY901);
- The cancellation or correction of an EMAR Form 1 (SVY901) mistakenly completed/issued.

### **2.17 Records for the CAMO.**

This chapter is only applicable when the maintenance organisation is retaining records on behalf of the CAMO (e.g. Original Aircraft Technical Logbooks, Life limited parts records, etc.).

- Contracted/tasked record keeping for CAMOs;
- Arrangements for processing and retention of CAMO 's maintenance records.

## **2.18 Reporting of defects.**

### **2.18.1 Internal occurrence reporting system.**

It shall be understood that the internal occurrence reporting system is intended to collect all reports internally generated by the maintenance organisation. The internal occurrences which fall within the definition of occurrences to be reported as per SIM-To-Lt-031 145.A.60 (e.g. to FIMAA, etc.) shall be only a part of the collection.

- Collection and evaluation of reports;
- Extraction of occurrences to be reported as per SIM-To-Lt-031 145.A.60 (which are referred in the following paragraph 2.18.2);
- Just culture (errors management procedure is expected in the MOE chapter 2.25);
- Description of the process to investigate occurrences (i.e. criteria to identify occurrences to be investigated, investigation report format, management actions in response to investigation findings, follow-up system, feedback to staff, etc.);
- Methods of maintenance errors investigation;
- Maintenance errors identified to be used for internal human factors training;
- Description of process to record occurrences;
- The analysis of occurrence data;
- Sharing information from investigations.

### **2.18.2 Reportable occurrences as per SIM-To-Lt-031 145.A.60.**

This procedure must describe the reporting procedure to FIMAA and all further addressees as required by national regulations. Any condition of the aircraft or component identified by the maintenance organisation that has resulted or may result in unsafe condition that hazards seriously the flight safety shall be reported.

- List of Reportable occurrences (refer to EMAD 20-8 under development for further guidance);
- Technical Occurrence Report Form;
- Methods for reporting;
- Reporting timescale;
- Reports must contain pertinent information and evaluation of results (where known);
- Persons responsible for reporting;
- Occurrences reported by Contractors/tasked organisations.

### **2.19 Return of defective aircraft components to store.**

- Labelling and identification of “defective” components (required information)
- Serviceable aircraft component found “defective” at installation (e.g. involvement of quality system for investigation, possible need to report the occurrence as per MOE chapter 2.18)
- Handling and movement of components (link between involved departments)
- Storage of “defective” components

### **2.20 Management of defective components with outside contractors / tasked organisations.**

This chapter shall refer to the process of sending components to outside contractors/tasked organisations for repair or modification.

This chapter is only applicable when the maintenance organisation is sending/contracting/tasking component maintenance to:

- Another SIM-To-Lt-031 145 AMO as per SIM-To-Lt-031 145.A.70 (a) (16). This fact shall be reflected in the MOE chapter 2.1 and the contract-ed/tasked organisation(s) listed in MOE chapter 5.4, or
  - Another maintenance organisation not holding a SIM-To-Lt-031 145 approval, as per SIM-To-Lt-031 145.A.75 (b). This fact shall be reflected in the MOE chapter 2.1 and the “contractors/tasked organisations” listed in the MOE chapter 5.2.
- Dispatch of components for repair / overhaul / calibration
  - Identification of required work
  - Return of the serviceable component after maintenance at the contractor/tasked organisation facility
  - Control of dispatch, location and return
  - Return of unserviceable loan parts
  - Management of the packaging and special transportation condition (e.g.: Wheels – oxygen bottles)

### **2.21 Control of computer maintenance records system.**

This chapter shall refer to the computer systems used to manage and/or record information regarding the maintenance tasks carried out.

- Description of the computer records system in use and relate objectives

- Information retrieval
- Back-up systems (frequency, means, and delay) and second site storage (frequency, means and delay)
- Security and safeguards to unauthorised access

This chapter shall not be confused to MOE chapter 2.14 "Technical record control" which is intended to cover the record keeping requirement addressed in SIM-To-Lt-031 145.A.55.

## **2.22 Control of man-hour planning versus scheduled maintenance work.**

- Hangar visit plan versus man-hour plan

The "hangar visit plan" shall be made available to demonstrate sufficiency of hangar space to carry out planned base maintenance. The relation between the hangar visit plan and the man-hour plan shall be described. The hangar visit plan shall also include other activities.

- Management system of maintenance organisation planning versus time available (e.g. A/C base maintenance or components maintenance activity, ...)
- Type of planning (man hours availability versus work load)
- Type of factors taken into account in the planning:
  - Human performance limitations
  - Complexity of work
  - Additional factors
- Planning revision process
- Organisation of shifts
- Use of "contracted/tasked"<sup>5</sup> personnel as per AMC 145.A 30 (d)

At least half the staff that perform maintenance in each workshop, hangar or flight line on any shift shall be employed to ensure organisational stability. For the purpose of meeting a specific operational necessity, a temporary increase of the proportion of contracted/tasked staff may be permitted to the maintenance organisation by the NMAAFIMAA in accordance with an approved procedure to be included in this MOE chapter, which shall describe the extent, specific duties, and responsibilities for ensuring adequate organisation stability.

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<sup>5</sup> "Contracted/tasked" means the person is employed by another maintenance organisation and contracted/tasked by that organisation to the SIM-To-Lt-031 AMO

- Notification to the Quality Manager and Accountable Manager of deviations exceeding 25% between the work load and the man hour availability

### **2.23 Control of critical maintenance tasks.**

This chapter is intended to establish a procedure to detect and rectify maintenance errors that could, as minimum, result in a failure, malfunction, or defect endangering the safe operation of the component/engine/aircraft if not performed properly.

- Procedure for the performance of critical maintenance tasks affecting safety:
  - Minimum list of “critical maintenance tasks affecting safety” defined by the maintenance organisation (e.g. engine installation, rigging/adjustment of flight controls);
  - Data sources used to identify the list of “critical maintenance tasks affecting safety” ((M)TCH data, occurrence reporting, audit, etc.);
  - Error capturing method(s) used. The primary error capturing method to be used shall be the independent inspection procedure as per AMC 145.A.48 (b) b). This procedure is expected to be detailed in the MOE chapter 2.25.

The list of “critical maintenance tasks affecting safety” should be subject to continuous evaluation and when necessary amendment by the maintenance organisation as the result of maintenance errors investigations, audit, (M)TCH data analysis, etc.

When the CAMO/Operating Organisation defines its own list of critical maintenance tasks affecting safety, the effective independent inspection tasks to be carried out are the independent inspections required by the SIM-To-Lt-031 MOE plus the ones required by the CAMO/Operating Organisation.

- Procedure to minimise the risk of multiple errors and errors being repeated in identical maintenance task

This procedure shall cover the prevention, where possible, of simultaneous maintenance by the same person on similar systems on the same aircraft (disassembly/reassembly of several components of the same type fitted to more than one system on the same aircraft during a particular maintenance check).

In particular, the procedure shall describe:

- Definition of simultaneous maintenance by the same person on similar parts/systems on the same component/engine/aircraft, including examples applicable to the scope of work (i.e. this may be a dual engine oil uplift, simultaneous replacements of two cabin pressure controllers, etc.);
- The related error capturing method(s) to be used. When more than one error capturing method is defined, criteria need to be established to prioritise the methods to be adopted. For example:
  - Planning the accomplishment of such “identical maintenance tasks” by different mechanics or to be done in different working shifts (this could be done for example at the maintenance planning phase);

- Completion of the identical maintenance tasks by adopting the independent inspection procedure;
- “Re-inspection task by the same person” when only one person is available (re-inspection to be recorded).

When a detailed procedure is necessary to further detail the peculiarities of the error capturing method(s) identified in this paragraph, this procedure is expected to be included in the MOE chapter 2.25. For example, in the case the error capturing method of “re-inspection task by the same person” is adopted, a detailed procedure is to be expected in the MOE chapter 2.25 to describe as a minimum how the “re-inspection” is going to be recorded in the maintenance records.

#### **2.24 Reference to specific maintenance procedures.**

- Maintenance outside the approved location (s) \* as per SIM-To-Lt-031 145.A.75(c) and chapter 1.9:
  - Support an unserviceable aircraft (AOG requiring defect rectification)
  - Occasional Line Maintenance
- Engine run up
- Aircraft pressure run
- Aircraft towing
- Aircraft taxiing
- Technical wash
- Control/ supervision of de-icing systems
- Handling and control of waste materials
- Scrapping of parts
- Aircraft military specific systems procedures
- Maintenance check flight in accordance with CAMO procedure

#### **2.25 Procedures to detect and rectify maintenance errors.**

- Error capturing method(s) chosen by the maintenance organisation.

This paragraph shall detail the various detailed procedures associated to each of the possible error capturing methods, which have been identified in the MOE chapter 2.23 as a mean to avoid errors during the performance of “critical maintenance tasks affecting safety” and/or “identical maintenance tasks”. As a minimum, the following error capturing methods procedures shall be detailed:

- Independent inspection procedure:
  - Definition as per AMC145.A 48 (b);
  - How to perform the independent inspection/what to check (e.g. ensure correct assembly, locking and sense of operation, etc.);
  - re-inspection procedure: record of re-inspection done by the same person in the case of “identical maintenance tasks”.

This Independent inspection procedure shall be consistent with the job descriptions entered in the MOE chapters 3.4, 3.7, 3.8, 3.11 and with the sign-off policy entered in MOE chapter 2.13.

In addition to the above the policy adopted for preventing omissions is to be described, being a standard error capturing method. This typically consists in having procedures which ensure: sign-off of task only after completion, policy for sign-off of group of tasks, work by trainees performed under supervision, etc. Those specific procedures may be included in other MOE chapters as applicable (i.e. sign-off policy in the MOE chapter 2.13), however in this paragraph the policy of preventing omissions shall be described.

- Procedure for general verification after completion of all maintenance as per SIM-To-Lt-031145.A 48 (d):
  - Missing tools and foreign object procedure.
- Aims and objectives of the error management system (this procedure may be developed in this chapter or referred to a procedure introduced in MOE chapter 2.18):
  - The encouragement of reporting
  - A code of practice
  - No reprisal policy
  - Feedback of the independent inspections

## **2.26 Shift / task handover procedures.**

- Aims and objectives of the shift handover
- Training of personnel in shift/task handover processes
- Recording of shift/task handover
- Description of a formalised handover process and required information:
  - Facility status
  - Work status

- Manning status
- Outstanding issues
- Other possible information
- Responsible person for managing and filling up the shift / task handover

**2.27 Procedures for notification of maintenance data inaccuracies and ambiguities to the author of the maintenance data.**

- Definitions of maintenance data ambiguities
- Method of internal notification of maintenance data ambiguities
- Method of external notification of maintenance data ambiguities to the authors of that data
- Method of assessment and extraction of those ambiguities / inaccuracies to be reported under MOE chapter 2.18 as mandatory reportable occurrences
- Feedback to staff and implementation of author corrections
- Impact of the data ambiguity on the on-going maintenance task

The authors are:

- Aircraft / component design organisation (AMM, SB, SRM,...)
- The FIMAA
- The (M)TC / (M)STC holder
- The maintenance organisation itself in the case of maintenance organisation job cards
- The CAMO / Operating Organisation in the case of job cards issued and furnished by the CAMO / Operating Organisation

**2.28 Maintenance planning procedures.**

- Analysis of the work order to ensure the requested maintenance re-mains within the approved scope of approval.
- Verification that the maintenance work package provided by the CAMO/Operating Organisation is utilizable by the maintenance organisation. In any case the maintenance organisation shall issue an internal work package as detailed in MOE chapter 2.13:
  - Case 1: CAMO/Operating Organisation job cards to be used (with appropriate training)
  - Case 2: work package to be developed and prepared by the maintenance organisation based on the CAMO/Operating Organisation work order

- Control of the availability and update of maintenance documents (list + MM / job cards /...)
- Procedure for establishing all necessary resources are available before commencement of work (manpower with required capabilities, staff, facilities, tools, equipment, parts, documentation, etc.)
- Procedure for outsourcing contractors/tasked organisation as necessary.
- Procedure for organizing maintenance personnel and providing all necessary support during maintenance
- Consideration of human performance limitations (Circadian rhythm / 24 hours body cycle...)
- Planning of critical maintenance tasks

Note: The main driver to determine whether a scheduled maintenance check shall be considered as “line maintenance” shall remain the content of the check. Additional tasks or constraints may be also associated to the check such as deferred items, rectification of defects, inspection requesting skilled workers, qualification of the certifying staff, environmental conditions, overall length of the tasks etc. Access to a hangar or hangar in the nearby shall be part of the decision making. Therefore a “decision making process” is necessary to assess the content of the check.

## **PART L2 - ADDITIONAL LINE MAINTENANCE PROCEDURES**

MOE Part L2 is intended to provide additional procedures which are specific for the line maintenance environment, which have not been covered in the MOE Part 2. Where a procedure, was already covered in the MOE Part 2 and there is no need of further detail to be added, a direct reference to the MOE (Part 2) chapter may be used in the relevant MOE (Part L2) chapter.

### **L2.1 Line maintenance control of aircraft components, tools, equipment, etc.**

This chapter must describe the additional / special procedures of the management of the facilities, materials/ ingredients and tools/ equipment, technical documentations, staff associated to the line maintenance activity. For example, this applies when a line station separate from the main maintenance site needs to use procedures to control the components, tools, equipment which are not the same used in the main site as described in MOE Part 2.

- Component / Material acceptance - (required documentation, condition, "Quarantine" procedure)
- Components removed serviceable from aircraft
- Procedures to maintain satisfactory storage conditions - (routable, perishables, flammable fluids, engines, bulky assemblies, special storage requirements)
- System for control of shelf life and modification standard

- Tagging / labelling system (serviceable, unserviceable, scrap, etc.)
- Release of components to the maintenance process
- Tools and test equipment, servicing and calibration programme / equipment register
- Identification of servicing / calibration due dates
- Procedure for general verification after completion of line maintenance as per SIM-To-Lt-031 145.A.48 (d)

## **L2.2 Line maintenance procedure related to servicing / fuelling / de-icing / including inspection for removal of de-icing / anti-icing fluid residues, etc.**

This chapter must describe the additional / special procedures of management of the specific activities:

- Technical and maintenance documentation management (control and amendment)
- Maintenance organisation Technical Procedures / Instructions management
- Fuel supply quality monitoring (bulk storage / aircraft re-fuelling)
- Ground de-icing (procedures / monitoring of contractors/tasked organisations)
- Maintenance of ground support equipment
- Aircraft military specifics systems procedures
- Monitoring of contracted/tasked organisations ground handling and servicing

## **L2.3 Line maintenance control of defects and repetitive defects.**

This chapter must describe the general procedures followed by the maintenance organisation regarding the rectification of defects and repetitive defects recorded during operation of the aircraft. The procedures shall also cover the follow up of defects and repetitive defects on behalf of CAMO/Operating Organisation and the SIM-To-Lt-031 AMO.

- Reportable defects
- Rules for deferring (periods - review - permitted personnel - conformity with MEL /CDL provisions)
- Awareness of deferred defects carried by aircraft – (monitoring of repetitive defects - communication with main operation base)
- Analysis of tech log (repetitive defects – crew complaints - analysis and transfer of cabin log items as required)
- Co-ordination with the CAMO/Operating Organisation

- Procedure on how to deal with defects requiring B2 certifying staff in the case of line stations where such staff is not permanently available

#### **L2.4 Line procedure for completion of aircraft technical log.**

- Technical Log system:
  - Taking into account CAMO/Operating Organisation Procedure
  - Distribution of copies
- Training on CAMO/Operating Organisation procedures and maintenance record completion (log-book, ...)
- Certification / Sign-off (Maintenance Statements)
- Maintenance Duplicate Inspections
- ETOPS Certification where applicable
- Retention of records:
  - Periods
  - Methods and security

#### **L2.5 Line procedure for pooled parts and loan parts.**

This chapter must describe the additional management procedures for pooled or loaned parts specific to the line maintenance activity. It shall also cover the removal of serviceable parts from aircraft for use on another aircraft. These procedures must be associated to chapters 2.2, 2.3, 2.19, 2.20 of the MOE.

- Verification of approved sources of parts (sources, conformity with maintenance organisation requirements, Modification Standard and AD compliance, records)
- Compliance with loan and contract requirements
  - Tracking and control
  - Required documentation
- Processing removed loan parts for return to source (records)
- Components removed serviceable from aircraft

#### **L2.6 Line procedure for return of defective parts removed from aircraft.**

This chapter must describe the additional management procedures for treatment of defective components associated with the line maintenance activity. These procedures must cover the same subjects specified in chapters 2.19, 2.20 (return of removed components, sending components...) of the MOE.

## **L2.7 Line procedure control of critical maintenance tasks.**

This chapter is the equivalent of the chapter 2.23 of the MOE for the line maintenance activity.

- Follow guidance as per AMC 145.A.65 (b) (3)

## **PART 3 – QUALITY SYSTEM PROCEDURES.**

### **3.1 Quality audit of maintenance organisation procedures.**

This chapter must explain how the audit of internal procedures is organised and managed i.a.w. SIM-To-Lt-031 145.A.65 and associated AMC 145 A 65.

In particular this chapter shall describe how the requirements for system/procedure audit are complied with and the methodology of the audit. Small maintenance organisation may choose to contract/task the audits to another organisation or an outside person with satisfactory technical knowledge and satisfactory audit experience (link to MOE chapter 3.6).

- Definition of the Quality System:
  - Independence of the quality compliance monitoring staff (e.g. quality auditor)
  - Access to Accountable Manager
  - Composition and functions of management quality staff
- Definition of the “system/procedure” audit (ref. AMC 145.A.65 (c) (1) 3&4):
  - Common audit procedures for several lines of product
  - Specific audit procedure by line of product
  - Single exercise audit or subdivided over 12 months
- Findings classification (ref. SIM-To-Lt-031 145.A.95):
  - Procedures to manage findings and related due dates to be entered in MOE chapter 3.3
- “System/procedure” Audit programme:
  - System/procedure audit plan (refer to GM 145.A.65 (c) (1))
  - Principles of annual audit procedure planning
  - Grouping of audits
  - Dates and timescales
  - Audit of the Quality system by an independent auditor, being either:

- A person employed by the maintenance organisation and working in another department (i.e. production), or;
- A person contracted/tasked by the maintenance organisation (part-time basis or short time contract/task based on the AMC EMAR 145.A.30 (d) contracted personnel) to perform audits on the quality system procedures. This case does not mean contracting/tasking the quality system.
- Audit of contracted/tasked organisations, as applicable depending to the monitoring criteria defined in MOE chapter 2.1
- Scheduled audits and audits to be carried out at random and to be carried out during maintenance including night shifts
- Validation/internal approval of the audit programme and management of changes to the programme
- Follow up of the audit program: scheduled, performed, audit report issued, open/close – link with MOE chapter 3.3
- Maintenance organisation Audit Policy including compliance audit:
  - Audit notification
  - Audit reports (documents used, writer, issue, points checked and deviations noted, deadline for rectification)
  - Reference can be made to MOE chapter 3.3 detailing the process to manage findings
  - Allocation of resources to the audit (audit team, team leader, etc.)
  - Principles when deviations are noted on a line of product
- Quality audit reports retention:
  - Duration (At least duration of 2 years from the date of the findings closure) / location
  - Type of documents (notification, audit reports, check list, audit programs)

### **3.2 Quality audit of aircraft and / or components.**

This chapter must describe the procedures related to the product audits (aircraft, aircraft component, engine, specialised service) according to SIM-To-Lt-031 145.A.65 (c) 1 and AMC 145.A.65 (c) 1).

- Definition of “Product” audit (ref. AMC 145.A.65 (c) (1) 5)
- Maintenance organisation “Product” Audit Policy:
  - A dedicated “Product” audit policy may be added, provided it does not conflict with the one described in the previous chapter. The maintenance organisation audit procedure shall include the quality audit of aircraft (and/or component)

- "Product" Audit programme:
  - Product samples for each line of product (aircraft and / or components and/or engines and/or specialised services)
  - Dates and timescales
- "Product" Auditing methods:
  - Sampling
  - "Trail" / "investigation" audits with regard to previous findings/trends,...
- Records of "Product" audit reports:
  - Duration (At least duration of 2 years from the date of the findings closure) / location
  - Type of documents (notification, audit reports, check list, audit programs, ...)

Small maintenance organisation may choose to contract/task the audits to another organisation or an outside person with satisfactory technical knowledge and satisfactory audit experience (link to MOE chapter 3.6).

### **3.3 Quality audit remedial action procedure.**

This chapter must describe the procedures of follow up of corrective actions (originating from internal Quality audits and/or FIMAA audits).

- Description of the quality audit report feedback system
- Corrective action and timescale:
  - Corrective action planning and follow up e.g. notified, answered, corrective action accepted, open/closed
  - The corrective action plan shall be designed in a way which allows identifying and recording the finding, the root cause, the relevant immediate and long-term preventive action with the appropriate timescales.
- Management of finding due dates:
  - Alert system, finding database
  - Extension of the due date
  - Procedure describing the maintenance organisation actions when the corrective action deadline has to be postponed or when the answer has not been received on time.
- Management responsibilities for corrective action and follow-up
- Review of the Quality system overall results:

- Meeting with the Accountable Manager. (including record of meeting procedure)
- Regular meetings to check the progress of corrective actions

The follow up of corrective actions cannot be contracted/tasked. The revision of the audit planning according to the deviations noted/corrected could be linked to MOE chapter 3.1.

### **3.4 Certifying staff and support staff qualification and training procedures.**

This chapter shall refer to SIM-To-Lt-031 145.A.30, AMC 145.A.30, SIM-To-Lt-031 145.A.35 and AMC 145.A.35 and is limited to the certifying staff and category B1 and B2 support staff qualification. Clear differentiation is expected for each different rating in the scope of work (e.g. aircraft, engines, components, specialised services).

#### **3.4.1 Aircraft certifying staff and / or support staff.**

- Experience, training and competence requirements
- SIM-To-Lt-031145 C/S - S/S individual authorisation \*: requirements for initial issue, extension (scope of work), renewal, withdrawal of the authorisation, including, as applicable:
  - “Certification Authorisation” for aircraft line/base maintenance certifying staff (cat. A, B1, B2, C as applicable);
  - Individual authorisation for aircraft base maintenance support staff (B1, B2 as applicable).

Note: the competence assessment process for issuance, extension, and renewal of the SIM-To-Lt-031 C/S - S/S individual authorisation is expected to be described in the MOE chapter 3.14 “Competence Assessment”.

- Continuation training procedures (maintenance organisation procedures, new technology, human factor issues, etc.
- Demonstration of 6/24 months maintenance experience or exercising certifying authorisation /support staff privileges including a table of similar aircraft types/series/groups (relevant to the scope of work hold by the maintenance organisation) to be used for the demonstration of 6/24 months requirement
- Situations where personnel not meeting the 6 months requirement to be approved by the Accountable Manager as C/S and S/S on a temporary basis to be reported to the FIMAA as per AMC 2 145.A 35 c)
- One-off certification authorisation

### 3.4.2 Components / Engines / APU certifying staff.

- Experience, training and competence requirements
- SIM-To-Lt-031 C/S individual authorisation: initial issue, extension (scope of work), renewal, withdrawal procedures

Note: the competence assessment process for issuance, extension, renewal of the SIM-To-Lt-031 C/S individual authorisation is expected to be described in the MOE chapter 3.14 "Competence Assessment".

- Continuation training procedures (maintenance organisation procedures, new technology, human factor issues, etc.)
- Situations where personnel not meeting the 6 months requirement to be approved by the Accountable Manager as C/S on a temporary basis to be reported to the FIMAA as per AMC 2 145.A 35 c)
- Demonstration of 6/24 months maintenance experience including criteria to define similarity of engines /components/APUs (relevant to the scope of work hold by the maintenance organisation) to be used for the demonstration of 6/24 months requirement

### 3.4.3 Specialised services certifying staff.

- Internal experience, training and competence requirements in addition to EN 4179 or national equivalent qualification (NDT refers)
- EMAR 145 C/S individual authorisation: initial issue, extension (scope of work), renewal, withdrawal procedures

Note: the competence assessment process for issuance, extension, renewal of SIM-To-Lt-031 145 C/S individual authorisation is expected to be described in the MOE chapter 3.14 "Competence Assessment".

- Continuation training procedures (maintenance organisation procedures, new technology, human factor issues, etc.)

### 3.5 Certifying staff and support staff records.

This chapter must describe how the certifying staff records are managed.

- List of certifying personnel and B1/B2 support staff (refer if need be to chapter 1.6)
- Constitution of the records (electronic or paper copy) as per AMC 145.A.35(j)
- Management of certifying staff records:
- Retention of records:

- Duration / location
- Type of documents
- Format of the SIM-To-Lt-031 C/S-S/S individual authorisation document and authorisation codes
- Control of certifying staff records by:
  - Authorized persons
  - FIMAA personnel
  - Authorized managers
  - Delivery of a copy of their SIM-To-Lt-031 C/S-S/S individual authorisation in either a documented or electronic format (SIM-To-Lt-031 145.A.35 (k)). The scope of work has to be detailed, including limitations when applicable

### **3.6 Procedures for qualifying of quality audit personnel.**

This chapter must describe how the Quality system personnel are managed.

- Required experience and competence (professional background and minimum number of audits performed under supervision)
- Required training including audit techniques, Regulation, MOE and continuation training
- Specific experience and/or technical training in order to be authorised to audit specific areas or to cover specific audit functions, as applicable to the maintenance organisation (e.g. audit of NDT areas, Lead auditor, etc.)
- Scope of authorisation for auditors (e.g. Product auditor, System Auditor, NDT auditor, etc.)
- Authorisations issue, extension, renewal or withdrawal procedures

Note: the competence assessment process for issuance, extension, renewal of the SIM-To-Lt-031 Authorisation is expected to be described in the MOE chapter 3.14 “Competence Assessment”.

- Independence of quality audit personnel when the maintenance organisation uses skilled personnel working within another department than that of Quality
- Retention of records:
  - Duration / location
  - Type of documents
- Check that the number of quality personnel remains adapted to the maintenance activity to be supervised (relation with MOE chapter 2.22 “Man hour planning”)
- Allocated man-hours (if not full-time employed) shall be addressed

### 3.7 Procedures for qualifying of inspectors.

This chapter is dedicated to the qualification and authorisation of the “qualifying inspectors” which undertake inspection functions and sign-off the related task(s).

The various types of “Qualifying inspector” personnel, as applicable to the maintenance organisation, need to be addressed (e.g. aircraft inspector, component inspector, engine inspector, store receiving inspector, etc.).

For example, they may be authorised:

- As Aircraft/component/engine qualifying inspectors, in order to sign-off (ref. MOE 2.13 table):
  - The tasks performed under supervision (i.e. work performed by trainees);
  - The independent inspection tasks.
- As Store incoming inspectors, to perform and attest the receiving inspection of aircraft components/materials as per MOE 2.2 procedure

Note: In the aircraft base maintenance environment the qualifying inspector’ function does not correspond to the support staff function. After the task sign-off, a further inspection stage is necessary by B1 and/or B2 Support staff as applicable. B1 and B2 Support Staff shall ensure that all relevant tasks or inspections have been carried out to the required standard before the category C certifying staff issues the certificate of release to service of the aircraft.

When the staff is holding more than one authorisation (i.e. qualifying technician, qualifying inspector and certifying staff), the different authorisations shall be clearly distinguished.

For example: a person may be at the same time:

- Qualifying technicians on the A 400M (TP 400), C 130 J (RR AE2100) and Casa 295 M (PW 127G);
- Qualifying inspector on the A 400M (TP 400) and C 130 J (RR AE2100);
- Holding a certification authorisation as certifying staff only for the C 130 J (RR AE2100).

Clear differentiation is expected for each different rating in the scope of work (e.g. air-craft, engines, components, specialised services).

- Experience, training and competence requirements
- Aeronautical and practical Experience
- General Training (FTS, CDCCL, EWIS when needed and Human Factor, MOE, standard practices,...)
- Specific training requirements applicable to the scope of activity (aircraft, engine, store, etc.)
- Knowledge of the language in which the maintenance approved data are written

- Authorisations issue, extension, renewal or withdrawal procedures including scope of authorisation

Note: the competence assessment process for issuance, extension, renewal of the SIM-To-Lt-031 Authorisation is expected to be described in the MOE chapter 3.14 “Competence Assessment”.

- Continuation training procedures including:
  - Training Programme (MOE and associated procedures, SIM-To-Lt-031, Human Factor, special requirements, ...)
  - Training setting up
  - Duration, intervals
- Retention of records:
  - Duration / location
  - Type of documents

### **3.8 Procedures for qualifying of maintenance personnel.**

This chapter shall refer to the different specialities of technicians (mechanics, avionics, sheet metal workers, cabin, fuel, engines, painters, welders, cleaners, components, NDT staff, composites, line maintenance, ...), as applicable to the maintenance organisation. Those personnel have to be considered authorised by the maintenance organisation approved under SIM-To-Lt-031 to sign-off<sup>6</sup> tasks that the authorised qualifying technicians has personally performed. Consistency shall be ensured with the sign-off policy described in MOE chapter 2.13. An authorised qualifying technician is not authorised to issue a release to service for aircraft or component or engine or NDT unless he/she is also holding a “certifying staff privilege”.

When the staff is holding more than one authorisation (i.e. qualifying technician, qualifying inspector and certifying staff), the different authorisations shall be clearly distinguished.

For example: a person may be at the same time:

- Qualifying technicians on the A 400M (TP 400), C 130 J (RR AE2100) and Casa 295 M (PW 127G);
- Qualifying inspector on the A 400M (TP 400) and C 130 J (RR AE2100);
- Holding a certification authorisation as certifying staff only for the C 130 J (RR AE2100).

Clear differentiation is expected for each different rating in the scope of work (e.g. aircraft, engines, components, specialised services).

- Experience, training and competence requirements

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<sup>6</sup> A “sign-off” is a statement by the competent person performing or supervising the work, that the task or group of tasks has been correctly performed. A sign-off relates to one step in the maintenance process and is therefore different from the release to service of the aircraft

- Aeronautical and practical Experience
- General Training (FTS, CDCCL, EWIS when needed and Human Factor, MOE, standard practices,...)
- Specific training requirements applicable to the scope of activity (aircraft, engine, store, etc.)
- Knowledge of the language in which the maintenance approved data are written
- Authorisations issue, extension, renewal or withdrawal procedures including scope of authorisation

Note: the competence assessment process for issuance, extension, renewal of the SIM-To-Lt-031 Authorisation is expected to be described in the MOE 3.14 "Competence Assessment".

- Continuation training procedures including:
  - Training Programme (MOE and associated procedures, SIM-To-Lt-031, Human Factors, specific technical requirements, ...)
  - Training setting up
  - Duration, intervals
- Retention of records:
  - Duration / location
  - Type of documents

### **3.9 Aircraft or aircraft component maintenance tasks exemption process control.**

This chapter must describe the procedures of the maintenance organisation regarding exceptional authorisations related to maintenance tasks. As per Appendix XI to AMC M.A.708 (c), deviations have to be requested by the CAMO to its FIMAA or granted by the CAMO in accordance with a procedure approved by the FIMAA. The contract/tasking between the CAMO/Operating Organisation and the maintenance organisation shall specify the support the SIM-To-Lt-031 AMO may provide to the CAMO in order to substantiate the deviation request. This chapter is to be considered applicable only under these circumstances.

- System for control and processing with the FIMAA which includes:
  - Relations with the CAMO/Operating Organisation in case of deviation for a maintenance intervention in progress;
  - Supply to the CAMO of information enabling to write out requests for exceptional authorisation applications;
  - Control of the approval by the FIMAA (linked with CRS).

### **3.10 Concession control for deviation from the maintenance organisations' procedures.**

This chapter must describe the procedures followed by the maintenance organisation in order to deviate from the approved MOE procedures.

It shall be understood that any request for concession to deviate from MOE procedures shall be anyway in compliance with any regulatory requirement with particular reference to SIM-To-Lt-031. Under no circumstances this chapter may be used to deviate from regulatory requirements.

- Concession criteria:
  - Object, procedures involved, justifications, compensatory conditions, period of validity, etc.
- Concession management procedure:
  - Internal evaluation
  - Drafting process
  - Response
  - Internal validation process and follow-up
- System of approval and control of concession
- Feedback from the Quality system to FIMAA

Any concession shall be approved by the FIMAA.

### **3.11 Qualification procedure for specialised activities such as non-destructive testing, welding...**

This chapter shall refer to the qualification of specialised services staff such as defined in AMC 145.A.30 (f). It shall apply to all the specialised services mentioned in the MOE paragraph 1.9.4 (e.g. NDT, painting, welding, machining, NDI).

It is recommended to structure this chapter to provide qualification requirements for each group of specialised services staff in a separate paragraph.

The EN 4179 requires that an NDT written practice shall be in place to define:

- The specific technique(s) for each NDT method used in the maintenance organisation;
- The qualification and authorisation of NDT staff to meet the requirements of EN 4179.

For the purpose of SIM-To-Lt-031 the following document shall be issued:

- A document associated to the MOE to be referred as “NDT manual” only detailing the technical compliance of NDT activities/techniques under the control and approval of the responsible NDT level 3 to be referred in the MOE 1.9 chapter. In addition, the related approval process is to be described in the MOE 1.11 chapter;

- A procedure detailing the qualification and authorisation of the NDT staff to be included directly in the MOE 3.11 chapter.

### 3.11.1 NDT personnel.

- NDT staff:
  - List of non-destructive testing personnel
  - Levels of qualification and authorisation
  - Role and privileges of these staff (including responsible level 3 person who shall approve the maintenance organisation's NDT Manual)
- Experience & qualification:
  - Criteria regarding experience, training and skills
  - Experience required by NDT method for each level of authorisation
  - Responsible NDT level 3 shall demonstrate an appropriate knowledge of the manufacturer maintenance Data, SIM-To-Lt-031 requirements, MOE, Human Factors, FTS and EWIS
  - Level 3 requires suitable training/examination provided by an organisation under the general control of a national NDT Board or as specified by FIMAA should be addressed in this paragraph
- Training:
  - Basic NDT training for each level of authorisation
  - Training on the NDT procedures of the maintenance organisation
- Examination:
  - Procedure of skills assessment (practical assessment and/or examination related to the job card)
  - General examination on the fundamentals of the NDT methods
  - Specific examination by NDT method
  - Practical examination by level of authorisation
  - Medical examination
  - Eyesight testing
- Continuation training and testing
- Authorisations issue, renewal or withdraw procedures

- Retention of NDT staff records:
  - Duration / location
  - Type of documents
- Contract arrangement (this applies in the case of contracted/tasked staff as per AMC 145.A.30 (d))

The certifying staff authorised in accordance with subcategory B1 of the SIM-He-Lt-030 can carry out and/or control colour contrast dye Penetrant inspection/visible dye penetrant inspection.

When a maintenance organisation uses NDT methods defined by EN 4179 as “emerging NDT method”, the related requirements for personnel training, experience and examination shall be established by the maintenance organisation in accordance with EN 4179 and the particular equipment manufacturers’ recommendations.

This chapter shall also describe the qualification requirements applicable to NDT Level 3, particularly when he is contracted/tasked and/or not Certifying Staff.

### **3.11.2 Other specialised activities personnel (e.g. welders, painters, etc.).**

- Similar topics as the ones mentioned for NDT staff shall be described for each category, as applicable.

## **3.12 Control of manufacturers' and other maintenance working teams.**

This chapter shall refer to the role of outside teams acting in the premises of the maintenance organisation to carry out a maintenance task on an aircraft/ engine/ component in the scope of a task under the responsibility of the maintenance organisation.

### **3.12.1 External team working under their own SIM-To-Lt-031 approval.**

In this case at the end of the work, the external team will issue their own CRS for the work done (aircraft and/or component CRS, as applicable).

- Segregation between the two maintenance organisations working in the same premises
- Clear work order provided to the external working team
- Type of support (tools/equipment, facilities,...) made available to the External Team Working
- Management of the progress of work (meetings, etc.)
- SIM-To-Lt-031 release to service to be expected from the working team

### **3.12.2 External working team not holding an EMAR 145SIM-To-Lt-031 approval.**

In this case, the external working team shall be considered as a “contracted/tasked organisation” and the applicable procedures developed in MOE chapter 2.1 shall be followed. This contracted/tasked organisation shall be listed in MOE chapter 5.2 together with the scope of authorisation.

- Control of the contracted/tasked organisation
- System for control of materials, tools, working instructions and procedures
- System for control of documentation such as drawings, modification, re-pairs instructions
- Management of the progress of work (meetings, etc.)
- Certification procedure for work performed by the outside team such as: repair, replacement, modification, overhaul, test, inspection
- Environmental conditions
- Final certification
- Training on the internal procedures to external staff

### **3.13 Human factors training procedure.**

This chapter shall refer to SIM-To-Lt-031 145.A.30 (e) and AMC 2 145.A.30 (e) and GM1 to 145.A.30 (e) which concern the human factors training for the maintenance organisation personnel <sup>7</sup>.

#### **3.13.1 Initial training (except C/S and S/S).**

- Aims and objectives
- Categories of staff to be trained
- Implementation time frame<sup>8</sup>
- Training methods and syllabus: {refer to GM 1 145.A.30 (e)}
- Duration of training
- Validation of the training courses (syllabus and duration)
- Requirements for trainers
- Training Records:

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<sup>7</sup> Initial training to Human Factors for Certifying Staff and Support Staff is defined in Chapter 3.4

<sup>8</sup> Initial training to be provided to personnel within 6 months of joining the maintenance organisation, but temporary staff may need to be trained shortly after joining the maintenance organisation (AMC 2 145.A.30 (e))

- Duration / location
- Type of documents

### **3.13.2 All maintenance staff continuation training.**

- Aims and objectives
- Categories of staff to be trained
- Training methods and syllabus: GM 1 145.A.30 (e) tailored to the audience + audit findings + feedback in relation to relevant quality audit findings and other internal/external sources of information available to the maintenance organisation on human errors in maintenance (link with MOE chapter 2.25) (AMC 2 145.A.30 (e)).
- Duration of training
- Validation of the training courses (syllabus and duration)
- Requirements for trainers
- Training Records:
  - Duration / location
  - Type of documents

Human factors training could be adjusted to reflect the particular nature of the maintenance organisation (size, scope of work). Human factors continuation training shall be of an appropriate duration in each two-year period.

### **3.14 Competence assessment of personnel.**

This chapter 3.14 applies to all maintenance personnel involved in the SIM-To-Lt-031 activities (management personnel, certifying staff, qualifying mechanics, qualifying inspectors, quality auditor, engineering staff, maintenance planning staff, store inspectors, tools administrators, purchasers, etc....).

The qualification requirements to be assessed for each category of staff (being different from one to the other staff category) is expected to be found in the relevant MOE chapter (i.e. chapter 3.4 in case of Certifying/Support staff, chapter 3.6 “Procedures for qualifying of quality audit personnel”, chapter 3.7 “Procedures for qualifying inspectors”, chapter 3.8 “Procedures for qualifying of maintenance personnel”, etc.).

- Personnel to be assessed in accordance with AMC 1 145.A.30 (e) and GM 2 145.A.30 (e) “Competence assessment procedure”
- Management of competence assessment:
  - Assessment procedures for initial, extension and renewal of an authorisation (process/method used)
  - Person responsible for this process on behalf of the maintenance organisation

- When the assessment shall take place
  - Verification of the qualification requirements (i.e. experience, training, etc.).
  - Evaluation of competence “On-the-Job performance. Evaluation of competence by testing of knowledge by appropriately qualified personnel may be also considered when the possibility to perform On-the-Job performance is not feasible (i.e. In the case where the assessment is related to a new activity for which the maintenance organisation is not yet approved such as a new aircraft type, new component, etc.).
  - Supervision
  - Assessors
  - Commission/ examination
  - Actions to be taken when the assessment is not satisfactory
- Assessment records:
- Duration / location
  - Type of documents
  - Results of the assessment. The assessment records shall allow to:
  - Clearly identify the scope of the assessment (initial, extension or renewal of an EMAR 145SIM-To-Lt-031 C/S-S/S individual authorisation). This means for example:
    - For aircraft certifying staff, which is/are the category(s) (i.e. B1 line maintenance certifying staff, B1 base maintenance support staff, C base maintenance certifying staff, A line maintenance certifying staff, etc.) and which is/are the aircraft type (s) being assessed for endorsement in the authorisation (initial or extension of privileges);
    - For components certifying staff, which is/are the rating(s) (i.e. C14, C6, C5, etc.) and the specific components associated to each rating (i.e. Landing Gears P/N, Battery P/N, etc.) being assessed for endorsement in the authorisation (initial or extension of privileges);
    - For quality auditor, which is the scope of the auditor authorisation (i.e. system/procedures or product audit)
    - Etc.,
  - Clearly verify that all the applicable qualification requirements for the specific category of staff as detailed in the relevant MOE chapter (i.e. 3.4 in the case of certifying staff, etc.) being assessed are met;
  - Identify that the assessment included the evaluation of competence “On-the-Job performance” and/or testing of knowledge by appropriately qualified staff.

### **3.15 Training procedures for On-the-Job Training as per Section 6 of Appendix III to SIM-He-Lt-030.**

This chapter is limited to the case where the affirmative authority for the SIM-To-Lt-031 approval and for the SIM-He-Lt-030 Evidence of Qualification licence is the same.

### **3.16 NOT APPLICABLE**

## **PART 4.**

This MOE Part is to be considered applicable only to cover any CAMO's peculiar requirement which has to be endorsed in the MOE for the purpose of being used in the performance of maintenance (e.g. how to acquire the necessary information for removal of serviceable components, etc.). It is recommended to have a separate procedure for each CAMO.

### **4.1 Contracting / tasking CAMO.**

This chapter must describe for each contracting/tasking CAMO, the special mode of operation (procedures/ documents/ exchange of information, planning meetings, technical, quality, reliability) between the maintenance organisation and its CAMO.

### **4.2 CAMO procedures and paperwork.**

This chapter must describe for each contracting/tasking CAMO, the special mode of operation (procedures/ documents/ exchange of information, planning meetings, technical, quality, reliability) between the maintenance organisation and its CAMO.

- Need to receive training on CAMO procedures, work card / worksheet

### **4.3 CAMO record completion.**

This chapter must describe (for each contracted/tasked CAMO) how the maintenance organisation:

- Completes CAMO/Operating Organisation's log books
- Keeps the CAMO/Operating Organisation's technical records
- Retains records on behalf of the CAMO/Operating Organisation
- Communicates with the CAMO/Operating Organisation

## **PART 5.**

### **5.1 Sample of documents.**

This chapter must list all the documents and forms in use by the maintenance organisation. Each form shall be uniquely identified with a number and revision date to allow traceability of changes.

Examples:

- Request to FIMAA for approval of an Exposition amendment
- Request to FIMAA for acceptance of a Capability List change
- Material tags: Serviceable, Unserviceable and Scrap labels
- Tooling identification tag
- Maintenance Task Card (Scheduled Maintenance)
- Maintenance Task Card (Additional Defects)
- Base Maintenance CRS
- Line Maintenance CRS
- EMAR Form 1 (SVY901)
- Quality Audit Report Form
- Quality Audit Corrective Action Report Form
- Personnel Training Record
- SIM-To-Lt-031 C/S-S/S individual authorisation
- Concession Application and Approval

### **5.2 List of contracted / tasked maintenance organisations as per SIM-To-Lt-031 145.A.75 (b).**

This chapter must list the non-145SIM-To-Lt-031 contracted/tasked maintenance organisations working under of the maintenance organisation quality system linked with MOE chapter 2.1.

### **5.3 List of Line maintenance locations as per SIM-To-Lt-031 145.A.75 (d).**

This chapter must list the line station locations - linked with MOE chapter 1.8 and 1.9.

### **5.4 List of contracted / tasked maintenance organisations as per SIM-To-Lt-031 145.A.70 (a) (16).**

This chapter must provide the list of contracted/tasked maintenance organisations operating under their own SIM-To-Lt-031 approval - linked with MOE chapter 2.1.

The lists shown in 5.2, 5.3 and 5.4 are to be included within or associated to the MOE, is an integral part of the approval. This means that it shall be approved (directly by the FIMAA or by the maintenance organisation, through a procedure which has been previously approved by the FIMAA (refers to MOE chapter 1.10, 1.11).

**PART 6 – OPERATING ORGANISATION’S MAINTENANCE PROCEDURES.**

This section is reserved for those maintenance organisations who are also part of Operating Organisations.  
(e.g. cannibalization, battle damage repairs, contingency maintenance,...).