

Safety Information Bulletin

Airworthiness

SIB No.: 2020-05

Issued: 19 March 2020

Subject: Aircraft Maintenance Programme under Part-ML

Ref. Publications:

Regulation [\(EU\) 1321/2014](#) dated 26 November 2014, as amended by Regulation [\(EU\) 2019/1383](#) dated 08 July 2019 and as last amended by Regulation [\(EU\) 2020/270](#) dated 25 February 2020.

Applicability:

Aircraft owners, persons or organisations involved in the aircraft continuing airworthiness and design approval holders (DAH), in particular type certificate holders (TCH), of aircraft referred to in Article 3(2) of Regulation (EU) 1321/2014 ('Part-ML aircraft' - gliders, balloons and most airships, aeroplanes with maximum take-off mass (MTOM) up to 2730 kg and rotorcraft with MTOM up to 1200 kg and up to 4 occupants, as long as they are not used by licensed air carriers).

Description:

Regulation (EU) 2019/1383, applicable from 24 March 2020, introduces alleviations concerning the maintenance and continuing airworthiness management for the affected aircraft.

Among these alleviations, paragraph ML.A.302(b) offers two alternatives (refer also to ML.A.201 (e) and (f)) in respect of the aircraft maintenance programme (AMP): approval by a suitable organisation, i.e. by Continuing Airworthiness Management Organisation (CAMO) or Combined Airworthiness Organisation (CAO), (if contracted) or declaration by the aircraft owner. The competent authority is no longer involved in the review and approval of AMP for Part-ML aircraft.

Paragraph ML.A.302(c) also permits that the AMP of Part-ML aircraft is based on a generic minimum inspection programme (MIP), instead of on the DAH instructions for continuing airworthiness (ICA), which was already possible since the adoption of Regulation (EU) 2015/1088, but only for European Light Aircraft ELA1 not involved in commercial operations.

Whichever alternatives in paragraphs ML.A.302(b),(AMP approval or declaration), and ML.A.302(c) (ICA or MIP) are applied as basis for the AMP development the regulation imposes that the AMP includes, among others (ref. ML.A.302(c)(4)), "*mandatory continuing airworthiness information, such as repetitive ADs, the airworthiness limitation section ('ALS') of the ICAs, and specific maintenance requirements contained in the type certificate data sheet ('TCDS').*"

For each aircraft type, the ALS and the specific maintenance requirements contained in the TCDS, are elements that EASA has to approve as part of the process for granting a Type Certificate, in accordance with Regulation (EU) 748/2012 (i.e. Part-21) and the related Certification Specifications.

This is information only. Recommendations are not mandatory.



However, in case of grandfathered aircraft (aircraft deemed to have a type-certificate issued in accordance with Article 3 of Regulation (EU) 748/2012 – this includes some aircraft types that are still today in production), their type-certification basis may have not required from the TCH, to unmistakably identify the mandatory continuing airworthiness information for the aircraft.

Indeed, for some existing grandfathered aircraft, there was the understanding, under their former regulatory system, that all maintenance instructions issued for the aircraft would be complied with by the aircraft owner or operator. Therefore for these aircraft there is no explicit identification of *mandatory continuing airworthiness information*, since all were assumed as such.

Considering the above, the flexibility that Regulation (EU) 2019/1383 introduces in regard to the AMP, might tempt unaware owners to plan less frequently, or even disregard, certain tasks with a direct airworthiness impact when elaborating the AMP of aircraft for which their mandatory maintenance tasks have not been identified by the DAH.

At this time, the safety concern described in this SIB is not considered to be an unsafe condition that would warrant Airworthiness Directive (AD) action under Regulation (EU) [748/2012](#), Part 21.A.3B.

Recommendation(s):

DAH, in particular aircraft TCH, should understand the implications of Regulation (EU) 2019/1383 with regards to AMP and consider whether some maintenance instructions identified in the aircraft maintenance manuals or equivalent document should be identified as mandatory instructions, and in that case inform EASA accordingly.

Aircraft owners declaring AMP should educate themselves, or consult knowledgeable organisations (e.g. DAH, CAMO, CAO) or competent authorities, if in doubt of potential safety impact when disregarding maintenance instructions while defining the AMP for the affected aircraft.

CAMO and CAO should understand the implications of Regulation (EU) 2019/1383 and ensure that the personnel involved in the development and approval of AMP have the proper information, understanding and experience when deviating from the design approval holder ICA in the development of the AMP.

Contact(s):

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