



FAA/EASA MAG Revision 6 – What Does it Mean for the ASA Community?

Can an EASA 145 Receive a Part Without an EASA Form One?

EASA Required Documentation

- All maintenance is performed by 145s
 - No other entities have maintenance privileges
- EASA 145.A.42 imposes receiving requirements

- Important definition:

M.A.504 Control of unserviceable components

- (a) A component shall be considered unserviceable in any one of the following circumstances:
 - 3. absence of the necessary information to determine the airworthiness status or eligibility for installation;

EASA 145.A.42(a)

- (a) All components shall be classified and appropriately segregated into the following categories:
 - 1. Components which are in a satisfactory condition, released on an EASA Form 1 or equivalent and marked in accordance with Subpart Q of Annex I (Part-21) to Regulation (EU) No 748/2012.
 - 2. Unserviceable components which shall be maintained in accordance with this section.
 - 3. Unsalvageable components which are classified in accordance with point 145.A.42(d).

EASA 145.A.42(a)(4-6)

- (a) All components shall be classified and appropriately segregated into the following categories:
- 4. Standard parts used on an aircraft, engine, propeller or other aircraft component when specified in the manufacturer's illustrated parts catalogue and/or the maintenance data.
- 5. Material both raw and consumable used in the course of maintenance when the organisation is satisfied that the material meets the required specification and has appropriate traceability. All material must be accompanied by documentation clearly relating to the particular material and containing a conformity to specification statement plus both the manufacturing and supplier source.
- 6. Components referred to in point 21A.307(c) of Annex I (Part-21) to Regulation (EU) No 748/2012.

What is “Maintenance?”

- EASA Article 2(h):

‘maintenance’ means any one or combination of the following activities: overhaul, repair, inspection, replacement, modification or defect rectification of an aircraft or component, with the exception of pre-flight inspection;

Summary

- Under EASA regulations a 145 organization may receive a part without EASA Form One/8130-3, and inspect it to new or airworthy condition

Last Meeting, We Discussed MAG Rev. 5

- The FAA and EASA have a Bilateral Airworthiness Safety Agreement (BASA)
 - Executive Agreement, implemented by 14 C.F.R. Part 21 (including 21.500-502)
 - No comparable regulation for implementing Part 145 provisions
- The FAA and EASA have a Maintenance Annex Guidance (MAG)
 - Explains how the authorities will communicate and share data and responsibilities
 - Includes 'sample' supplements that have been implemented by inspectors as if they were regulations

MAG rev. 5 Language

k) Only the following new and used components may be fitted during maintenance.

(1) New Components.

i) New components must be traceable to the OEM as specified in the Type Certificate (TC) holder's Parts Catalogue and be in a satisfactory condition for installation. A release document issued by the OEM or Production Certificate (PC) holder must accompany the new component. The release document must clearly state that it is issued under the approval of the relevant AA under whose regulatory control the OEM or PC holder works.

MAG rev. 5 – Parts Catalogue

“New components must be traceable to the OEM as specified in the Type Certificate (TC) holder’s Parts Catalogue”

- Independent PMA articles and aftermarket TSOA articles are typically not found in the TCH IPC
- PC parts may not yet be in the IPC when the supplier has changed and a new part number is assigned

MAG rev. 5 – Release Certificate

“A release document issued by the OEM or Production Certificate (PC) holder must accompany the new component.”

- Excluded FAA 8130-3 tags, like those from DARs, DMIRs, ODAs, etc.

MAG Rev. 6

- Fixes some of the most obvious problems
- ...BUT...
- **PROBLEM:** The MAG uses different terminology and therefore does not synchronize properly with the regulations
 - “new” and “used” parts rather than “satisfactory condition” and “unserviceable”

MAG Rev. 6

- Requires new parts to bear EASA Form One or 8130-3
- ASA has been working with the FAA
- FAA has been cooperative
 - Had interpretations that would have resolved distribution issues
- EASA would not support the FAA's interpretation
- ASA has filed a placeholder notice of appeal
 - Recent DC Circuit case states that this is required to preserve the Association's rights
- **ASA continues to work with the FAA**