



EASA

European Aviation Safety Agency

Airworthiness Release Certification of Parts

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An Update on EASA's Rulemaking Activities

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- The European system
 - Part 21 POA concept
 - Part 145 MOA concept
 - FORM 1 – Authorised Release Certificate
- Acceptance of FAA system under the EU/US BASA
- Rulemaking task RMT.0018 (NPA 2017-19)
- Status of Opinion 12-2013: Control of Suppliers



The European system

Production

Reg (EU) 748/2012 (Part 21) allows new parts, manufactured by approved production organisations (POA) and released with FORM 1 to be used in Part M/145 environment.

Manufacturing without POA is possible, but requires the authority signing each Form 1.

Maintenance

Reg (EU) 1321/2014 (Part M/145) mandates approved maintenance organisations:

- to use only **new** parts with a Form 1 or equivalent(*)
- to use only **maintained** parts with a Form 1 or equivalent(*)





Part 21 POA concept

- ❑ An approved production organisation is required to: e.g....
 - ✓ work with approved design data and have direct exchange of information with the design holder (DOA)
 - ✓ **have a quality system**
 - ✓ control its manufacturing processes through approved procedures and definition of staff responsibilities
 - ✓ **control suppliers of incoming raw material and parts**
 - ✓ report any unsafe condition caused during manufacturing to DOA and authority
 - ✓ be approved and continuously overseen by an EU aviation authority

..... and is entitled to issue a Form 1 for a new part attesting conformity with approved design data

- ❑ **Suppliers to a POA are not required to issue a Form 1 for parts/subassemblies, which they deliver to the POA .**



Part M/145 concept

- ❑ Prerequisite to perform maintenance on EU registered complex aircraft, is a Part 145 Maintenance Organisation Approval (MOA).
- ❑ Similar organisational requirements as per POA, but Reg (EU) 1321/2014 (Part M/145) mandates approved maintenance organisations:
 - to use only **new** parts accompanied by a Form 1 or equivalent(*)
 - to use only **maintained** parts accompanied by a Form 1 or equivalent(*)
 - Standard Parts (e.g. bolts) and consumable/raw material are exempted from the Form 1 requirements.

(*) – recognises other possibilities when there is a BASA.



EASA-Form 1: Authorised Release Certificate

- Primary purpose: to declare airworthiness of
 - new aviation products, parts and appliances, or
 - after maintenance work undertaken on products, parts and appliances
- new Parts: certifies conformity with approved design data
- used Parts: certifies that maintenance work was performed in accordance with approved procedures
- is signed by an authorized, responsible person.
- it does not automatically constitute authority to install an item on a particular aircraft, engine, or propeller but helps the end user determine its airworthiness approval status.



Acceptance of the US system

- ❑ The EU/US BASA requires a certificate (Form) to be issued by US-based organisations, which is equivalent to an EASA Form 1:
 - FAA Form 8130-3 for new parts
 - FAA Form 8130-3 dual-release for maintained parts

- ❑ The FAA Form 8130-3 dual-release can only be issued by USA-based organisations approved both as USA and EU Part 145 Maintenance Organisations (MOA).



Acceptance of the US system

Any part to be installed during maintenance in an EU registered aircraft should have been released with a:

- EASA Form 1 (new or maintained parts), or
- FAA Form 8130-3 (new parts), or
- FAA Form 8130-3 dual release (maintained parts)

New parts produced in the USA accompanied with a Certificate of Conformity (CoC), cannot be installed in an EU registered aircraft, even though this may be permitted for USA registered aircraft under FARs.



- ❑ NPA 2017-19 proposes more proportionate **manufacturing & release certificate requirements** and also **marking requirements** for new parts and appliances.
- ❑ Depending on the outcome of NPA 2017-19 Certificates of Conformity (CoC) issued under FARs, might become acceptable to accompany certain new parts produced in USA for installation in an EU registered aircraft



NPA 2017-19 (RMT.0018)

- ❑ Design Approval Holders would be allowed to assign **Criticality Levels** for their parts based on the potential safety impact should the part fail.
- ❑ Only Design Approval Holders (or EASA) would be entitled to establish CLs for parts. (default: All parts fall under most stringent CL)
- ❑ Parts with low or no safety impact would not need to be manufactured under POA (no Form 1), but instead use industry recognition systems and standards.
- ❑ Part 145-organisations would only be required to request a Form 1 accompanying a supplied new part, when so identified in the DAH part's classification.



Next Steps:

- NPA comment phase closed 30th March 2018
- Review of comments phase ongoing
- Expected publication of EASA Opinion: Q4/2018
- Expected final rule; Impl. Rule & Decision: Q4/2019



Control of Suppliers (Opinion 12-2013)

- ❑ In April 2018, the EASA Committee voted in favor of Opinion 12-2013 on “Control of Suppliers”,
- ❑ We expect adoption in August/September 2018
- ❑ It was finally decided not to include reference to voluntary industry accreditation programs into the rule.

Note: Proposed text GM3 145.A. 42 (b)(1) Supplier Evaluation:

Suppliers certified to officially recognised standards that have a quality system that includes the elements specified in (a) may be acceptable; such standards include:

- (1) EN/AS9120 and listed in the OASIS database;
- (2) ASA-100;
- (3) EASO 2012;
- (4) FAA AC00-56.

The use of such suppliers does not exempt the organisation from its obligations under 145.A.42 to ensure that supplied components and materials are in satisfactory condition and meet the applicable criteria of 145.A.42.



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- ❑ **Technical Implementation Procedures (TIP) rev 6** entered into force on **22. March 2018**
- ❑ All design changes have now a common approval path:
 - Accepted - Certificates or approvals from the Certifying Authority (CA) are automatically accepted by the Validating Authority (VA)
 - Streamlined validation (Basic) - VA issues its certificate on the basis of the CA certificate without technical involvement
 - Technical Validation (non-Basic) - VA performs a validation focused on non-basic criteria in accordance with a work-plan
- ❑ **Expansion of accepted data and approvals**
 - All repair data now accepted
 - All TSO/ETSO articles now accepted