

Information and Advisory Notice No. 09

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Recommendations for the Issue of Airworthiness Review Certificates

Introduction

This IAN serves as a guideline to the organisations appropriately approved in accordance with Commission Regulation (EU) No 1321/2014 Part-CAMO, Part-145 and Part-CAO for submission to TM CAD of recommendations for the issuance of an Airworthiness Review Certificates (ARC), EASA Form 15a/15b/15c.

This revision covers the new requirements and AMCs introduced in Regulations [\(EU\) 2026/56](#), [\(EU\) 2026/100](#) supplemented by [ED Decision 2026/005/R](#) which are applicable as from **7th August 2026**.

These new requirements introduce new concepts in Part-M/ML Subpart I which also require the CAMOs to change their procedures for submission of recommendations, ARC issue and extension.

Regulation

Recommendation for the Issue of the ARC shall be signed by ARS qualified pursuant to Part-CAMO.A.310 from CAMO's having the proper CAMO.A.125(e) privileges for the aircraft type.

Part-CAMO may carry out airworthiness reviews in accordance with Part-M.A.901 and ML.A.903, as applicable.

For aircraft covered by Part-ML, ARCs may be issued by a Part-145 approved under the provisions of 145.A.75(f) by ARS authorized pursuant to Part-145.A.37. The ARC shall be issued under the provisions of ML.A.903/[ML.A.906](#).

Part-CAO may be approved to carry out airworthiness reviews in accordance with point [M.A.901](#) of Annex I (Part-M) or point [ML.A.903/ML.A.906](#) of Annex Vb (Part-ML), as applicable, and:

- (i) issue the related ARC or recommendation for the issuance of the ARC;
- (ii) extend the validity of an existing ARC.

In the case of Part-ML aircraft, AR and ARC may be carried out or issued by independent certifying staff under the provisions of ML.A.904(c). In that case TM CAD would issue a letter authorizing the certifying staff to issue the recommendation or ARC.

General

There are **different scenarios** when recommendations are to be submitted to TM CAD for the issuance of an ARC EASA Form 15a in accordance with Part-M Subpart I:

- Importation of used aircraft to Malta from a third country (non-EU/EASA member). (Refer also to IAN 02), or
- Importation of used aircraft to Malta from a third country (non-EU/EASA member) without having an Export CofA. (Refer also to IAN 02), or
- Used aircraft transferred to Malta from another EU member state without a valid ARC or with the Certificate of Airworthiness surrendered or revoked, or
- Aircraft already on the Maltese Civil Aviation Register not continuously managed.

GM1 M.A.901(b) provides a definition of 'continuously managed'

Used aircraft transferred to Malta from another EU member state should have a valid ARC issued by the competent authority of the EU member state. **(Refer also to IAN 02)**

It is to be noted that an EASA Form 15b (ARC) can be issued following a satisfactory airworthiness review in accordance with Annex I Part-M.A.901(b)(1) or Annex Vb (Part-ML) when the CofA is valid. This means that the CAMO does not have to send a recommendation for the issue of the ARC (EASA Form 15a) by TM CAD.

The properly approved Part-CAO and Part-145 may also issue EASA Form 15c (ARC) following a satisfactory airworthiness review as per Part-ML.A.901(b) and (c).

The requirements for recommendations in relation to civil aircraft already registered in Malta are stipulated in M.A.901(b)(2) or ML.A.901 and ML.A.903.

The submitted recommendation, in order to be acceptable, shall contain at least the items listed in M.A.903 (b) and (c) for the document and physical survey review.

The requirements for applications and recommendations in relation to transferred aircraft between EASA Member States in M.A.905.

The requirements for recommendations in relation to used imported aircraft from a third country (non-EU/EASA member) without an Export Certificate of Airworthiness or a valid Part-21 CofA are stipulated in M.A.906 / ML.A.906. The ARS has to submit an **evaluation report** together with the recommendation as per **points 21.A.174(b)3(ii) and 21.A.174(d)3,4,5 or 21L.A.143 (f)**.

The evaluation report shall be submitted by the ARS.

The airworthiness review and recommendation shall be submitted by the ARS via the TM CAD Centrik online platform. The application shall be submitted well in advance such that ample time is available for the assessment of the recommendation and associated compliance reports/review and subsequent closure of any issues or comments by TM CAD.

Details concerning Airworthiness review items items

A full documented review of the aircraft records shall be carried out by the approved continuing airworthiness management organization ARS in order to be satisfied that:

1. airframe, engine and propeller flying hours and associated flight cycles have been properly recorded; and
2. the flight manual is applicable to the aircraft configuration and reflects the latest revision status; and
3. all the maintenance due on the aircraft according to the approved maintenance programme has been carried out; and
4. all known defects have been corrected or, when applicable, carried forward in a controlled manner; and
5. all applicable airworthiness directives have been applied and properly registered; and
6. All modifications and repairs applied to the aircraft have been registered and are in compliance with Annex I (Part-21) to Regulation (EU) No 748/2012; and
7. all service life limited components installed on the aircraft are properly identified, registered and have not exceeded their approved service life limit; and
8. all maintenance has been released in accordance with Part-M; and
9. the current mass and balance statement reflects the configuration of the aircraft and is valid; and
10. the aircraft complies with the latest revision of its type design approved by the Agency; and
11. The aircraft holds a noise certificate corresponding to the current configuration of the aircraft in compliance with Subpart I of Annex I (Part-21) to Regulation (EU) No 748/2012.

Through the physical survey of the aircraft, the airworthiness review staff shall ensure that:

1. all required markings and placards are properly installed; and
2. the aircraft complies with its approved flight manual; and
3. the aircraft configuration complies with the approved documentation; and
4. no evident defect can be found that has not been addressed according to Part- M.A.403; and
5. no inconsistencies can be found between the aircraft and the point (a) documented review of records.

The following is interpreting and explanatory information regarding **some** of the AMC M.A.901 (d) and (g) items. It should be clear, as stated in the "General" section, that the recommendation should contain at least **all** the items listed in the AMC.

General information

copy of the application

Form AITP-C03 Appendix II (only for aircraft having CofA issued by TM CAD)

CAMO information.

Full name of the organization, Part-CAMO approval reference, address and contact information, e.g. telephone, fax, e-mail address.

owner/lessee information

Full name of the owner/lessee/operator.

Date, period and place the document review and the aircraft survey were carried out – self evident.

period and place the aircraft can be seen if required by TM CAD

Should be stated only in case the aircraft is operated from a base outside Malta.

list of persons and organizations.

For aircraft used in commercial air transport (CAT) - the list of organizations involved in the continuing airworthiness management (CAMO) and maintenance. For aircraft not used in CAT – the names of the CAMO and of the certifying staff involved in the maintenance, together with their aircraft maintenance licence numbers.

(a) Aircraft information (AMC1 M.A.901(b)(2))

With regards to the mass and center of gravity data, a reference to the current and valid mass and balance report would suffice. All the rest of items under this sub-paragraph are self evident.

original export certificate

The export Certificate of Airworthiness (C of A) or equivalent document, issued by the competent authority of the state from which the aircraft is being imported.

Reference to evaluation programme when applicable

(b) Aircraft Documents accompanying the recommendation (AMC1 M.A.901(b)(2))

Reference to TM CAD approved AMP and maintenance bridging check and work packages requested by responsible person/s. **(Refer also to IAN 03A/B)**

type certificate datasheet (TCDS)

Latest revision of the TCDS should be used.

The aircraft holds a Type Certificate data sheet for noise certificate corresponding to the current configuration of the aircraft in compliance with Subpart I of Annex I (Part-21) to Regulation (EU) No 748/2012.

The aircraft and engine modification status shall be verified and checked against the Type Certificate data sheet for Noise. This verification shall be covered in the airworthiness review checklist.

maintenance programme (AMP)

Current issue/revision of the approved AMP should be used.

the current flight manual including supplements

The EASA approved flight manual reference and revision status should be indicated. The supplements to the AFM shall also be listed.

operational requirements

Operational requirements are not within the scope of the airworthiness review, however, in the case of aircraft importation any operational requirement applicable to the aircraft, e.g. CAT.IDE, LVO, RVSM, ETOPS, CPDLC, ADS B, Part-26 TCAS Version 7.1 etc. could be verified and indicated. **(Refer also to IAN 02)**

The above items should clearly state the exact reference of the data used in establishing compliance; for instance, the number and issue of the type certificate data sheet used should be stated.

aircraft total time and cycles

Aircraft total flight hours and flight cycles as of the date of the airworthiness review.

list of the ADs incorporated up to the latest published issue

Latest AD bi-weekly checked

All incorporated ADs, covering the aircraft airframe, engines, propellers, APU and installed equipment should be listed.

status of all service life limited components

All service life limited components should be listed including their respective life limits and current life figures.

(c) Maintenance

a copy of the work packages requested by the CAMO including details of any bridging check between the previous adopted maintenance programme and the proposed or current/latest approved AMP to ensure all the necessary maintenance has been carried out.

Copies of all work packages for maintenance checks/inspections which are not superseded by following maintenance are expected to be submitted.

(d) Maintenance Check Flight (AMC1 M.A.901(b)(2))

In the case of an aircraft import or aircraft in long storage the TM CAD may request a maintenance check flight to be carried out. These check flights shall be conducted in accordance with a check flight schedule appropriate for the scope of the flight.

A copy of the check flight report and the closure of any findings raised following the check flight shall be submitted.

(e) Aircraft survey

a precise list of the areas of the aircraft that were surveyed and their status.

This relates to the physical survey of the aircraft. Areas should be described using generally accepted terminology, e.g. lower fuselage skin; wing leading edge, forward cargo compartment; cabin emergency exits etc. Status should be in terms of the serviceability of the items belonging to the areas in question.

(f) Findings

a list of all the findings made during the airworthiness review with the corrective actions carried out.

All the findings raised during the airworthiness review should be listed with brief description of the corresponding corrective actions.

Each finding requires a corrective action before the issue of the ARC recommendation. The corrective action should be adequate to the open finding and it should be carried out and verified by the airworthiness review staff (ARS) before the issue of the ARC recommendation.

It is understood that, in certain cases findings that do not have an immediate impact on the airworthiness of the aircraft are discovered by the ARS; however, such findings shall also have an adequate corrective action accepted by the ARS before the issue of the ARC recommendation.

An 'adequate corrective action' means:

a final rectification when the findings affects the airworthiness of the aircraft and lowers the safety standard and hazards seriously the flight safety, or

- a root cause analysis and corrective action plan for those findings which show weaknesses in the continuing airworthiness management processes.

As an example, a corrective action plan can be a demonstration that the corrective action has started and the follow up of the finding is formally performed and transferred to the internal quality system of the organization managing the continuing airworthiness of the aircraft. The transfer of the findings must be documented.

TM CAD shall assess each such finding on a case by case basis and may require different corrective actions before issuing the ARC.

(g) Statement (refer to AMC1 M.A.901(b)(2))

A statement signed by the airworthiness review staff recommending the issue of the issue of an ARC.

In addition to the airworthiness review staff signature, his/her full name and company authorization reference should be included.

The statement should confirm that the airworthiness review has been performed in accordance with point M.A.903, and that the aircraft is considered airworthy at the time the review was completed.

Sampling in the Airworthiness Review Process

Airworthiness review sampling is covered by M.A.903 and AMC2 M.A.903(b);(c).

The ARS should use the sampling methodology should be covered by the CAME Section 4 procedures of the CAMO having CAMO.A.125(e) privileges based upon the AMC.

The supporting evidence and reports

Administrative issues

ARC Recommendations shall be submitted by the recommending organisation to the Airworthiness Inspectorate via the online TM CAD CENTRIK platform. The CAMO shall obtain access to the CENTRIK platform from the Airworthiness Inspectorate by liaising with TM CAD Airworthiness Inspectorate or the aircraft operator.

The application submitted shall include the **airworthiness review report, recommendation and associated supporting evidence and compliance reports.** The recommendation/airworthiness review assessment comments and communication are uploaded by the AI on the Centrik application.

The recommendations shall be sent in advance (at least 30 days) of the expiry date of the ARC to avoid delays and possible invalidity of the Certificate of Airworthiness.

In the case of importation of aircraft, the recommendation shall be submitted well in advance (at least 30 days) the entry into service to allow for the assessment of the recommendation and the coordination for the physical inspection of the aircraft.

If the Airworthiness review results in incorporated repairs and changes to type certificates not being approved by EASA pursuant to Part-21 and any EASA bilateral agreements, the TM CAD may issue temporary Article 71.1 exemptions in order to enable the ARS to close the Airworthiness

Review findings. The aircraft owner/operator is responsible for the application for the exemption/s and for ensuring all the conditions for the issue of the exemption/s are properly met.

TM CAD Inspections

In some cases, TM CAD may decide that it is necessary to organize a physical survey of the aircraft or full or partial airworthiness review, especially in the case of used imported aircraft. In this case, the owner / operator and the recommending CAMO will be informed with sufficient prior notice so that they may organize themselves in accordance with M.A.903(e).

The airworthiness review may be anticipated by a maximum period of 90 days without loss of continuity of the airworthiness review pattern, so as to allow for the physical review to take place during a maintenance check. Refer also to AMC M.A.901(f).

If the airworthiness review is anticipated by more than 90 days, the expiry date of the ARC will be set to one year from the date of issuance, regardless of the previous airworthiness review pattern.