

Information and Advisory Notice No. 10

Issue No: 4 Dated: 27 July 2026

Regulation (EU) No 1321/2014 Part-M/ML Subpart I and Airworthiness Review Privileges

1 Introduction

- 1.1 This Notice is intended to give guidance to Part-CAMO Continuing Airworthiness Management Organisations, Combined Approval Organisations and Part-145 AMOs concerning Part-M/ML Subpart I, ARC extensions and application for CAMO.A.125(e), CAO.A.095(c)2, 145.A.75(f) privileges to issue Airworthiness Review Certificates (ARC).
- 1.2 The provisions of Part-M Subpart I / Part-ML Subpart I apply to aircraft operated under (EU) No 965/2012 EASA-Ops (Part-CAT, NCC, SPO, NCO).
- 1.3 IAN No. 9 gives guidance on the contents of a Recommendation Report to be presented to TM CAD by a CAMO/CAO/145 with AR privileges.
- 1.4 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**.

2 Part-ML aircraft

Note (Part-ML) applies to the following other than complex motor-powered aircraft not listed in the air operator certificate of an air carrier licensed in accordance with Regulation (EC) No 1008/2008:

- (1) aeroplanes of 2 730 kg maximum take-off mass (MTOM) or less;
- (2) rotorcraft of 1 200 kg MTOM or less, certified for a maximum of up to 4 occupants;
- (3) other ELA2 aircraft.

- 2.1 TM CAD may carry out Airworthiness Reviews if requested by aircraft owners under the provisions of ML.A.901(b).

Part-CAMO

- 2.2 Part-CAMO may also carry out airworthiness reviews in accordance with Part-ML.A.903, as applicable.

Part-CAO

- 2.3 Part-CAO may be approved to carry out airworthiness reviews in accordance with point ML.A.903 of Annex Vb (Part-ML),
- 2.4 Part-CAO ARS shall comply with the qualification requirements of CAO.A.045.
- 2.5 The CAO shall nominate the person who will perform an airworthiness review of an aircraft under supervision of TM CAD or under the supervision of a person already authorised as airworthiness review staff of the CAO.

CAO can be approved to perform airworthiness reviews although it does not hold the privileges of continuing airworthiness management (for aircraft to which Part-ML is applicable). This means that the certificate will show the boxes 'maintenance' and 'airworthiness reviews' ticked.

Part-145

- 2.6 For aircraft covered by Part-ML, ARCs may be issued by a Part-145 approved under the provisions of 145.A.75(f) by Airworthiness Review Staff authorized pursuant to Part-145.A.37. The ARC shall be issued under the provisions of ML.A.903.
- 2.7 Part-145 ARS shall comply with the qualification requirements of Part-145.A.37.
- 2.8 The Part-145 shall nominate the person who will perform an airworthiness review of an aircraft under supervision of TM CAD or under the supervision of a person already authorised as airworthiness review staff of the Part-145.

Certifying staff

- 2.9 Airworthiness Reviews may be carried out and ARC 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, following the provisions of ML.A.904(d).

3 Part-M Aircraft

TM CAD may also carry out Airworthiness Reviews of aircraft and issue ARC in the following cases:

for any other aircraft of 2 730 kg MTOM and below, if the owner so requests. or whenever circumstances reveal the existence of a potential risk to aviation safety.

Provisions of Part-M Subpart I and CAMO.A.125 (e) Privileges

- 3.1 CAMO.A.125(e) privileges enable the CAMO to issue ARC's (EASA Form 15b) or issue recommendations following a satisfactory airworthiness review to a EASA member state of registry.
- 3.2 This means it can carry out these reviews and issue EASA Form 15b/15c provided these aircraft types are included in the scope of approval of the CAMO.

These reviews shall be carried out in accordance with the CAMO procedures as written in the section 4 of the CAME.

- 3.3 The definition of 'continuously managed' is found in GM1 M.A.901(b)
- 3.4 Those CAMO's (AOC holders) which do not wish to obtain CAMO.A.125(e) privileges would have to contract other appropriately approved CAMO's to perform the airworthiness review and issue an airworthiness review certificate for their managed/operated aircraft.
- 3.5 The recommendation for issue of an ARC has to be sent to the TM CAD for assessment in the case where the Part-21/21L is not valid or an export CofA is not available or when the aircraft has not been continuously managed. The ARS shall also send an evaluation report together with the recommendation.
- 3.6 The evaluation report shall summarise the evaluation programme.

4 Application to obtain CAMO.A.125(e) Privileges by CAMO's approved by the TM CAD

- 4.1 Applications to obtain **CAMO.A.125(e)** privileges shall be submitted to the Airworthiness Inspectorate on an EASA Form 2.
- 4.2 As part of the application process the CAMO's shall accomplish the following:
- 4.3 Applications to obtain the privileges shall be submitted to the Airworthiness Inspectorate on an EASA Form 2.
- 4.4 As part of the application process the CAMO's shall accomplish the following:
 - Submit the CAME Part 4 procedures and related forms and checklists for review and approval;
 - Submit a list of the proposed Airworthiness Review Staff (ARS);

NOTE:

AMC1 CAMO.A.300 contains all the headings required for the CAME Part 4

To qualify for Part-CAMO.A.125(e) privileges a CAMO shall have at least two qualified ARS

Requirements for the Airworthiness Recommendation for the issue of ARC are found in M.A.901(b) / ML.A.901.

Requirements for the Airworthiness review process are found in M.A.903(b) and (c) / ML.A.903.

AMC1 CAMO.A.320 covers procedures to be used when ARS is assisted by other personnel in the airworthiness review. These procedures should be incorporated in the CAME.

- Submit all the documentation related to the competence assessment of the ARS having regards to Part-CAMO.A.310 requirements for ARS qualifications, recency and experiences and independence from continuing airworthiness management.

- Arrange for the Airworthiness Review Staff to undergo/carry out a supervised airworthiness review with the Airworthiness Inspectors to comply with Part-CAMO.A.310(c);
 - Submit a sample recommendation report, aircraft and documentation report based on M.A.901 and its AMC. And Airworthiness review iaw M.A.903 (Refer also to IAN No. 9 for the content of the recommendation report).
- 4.5 The Airworthiness Inspectorate will reserve the right to carry out documentation and aircraft inspection as necessary both as part of the oversight of the CAMO's and as part of the aircraft monitoring.
- 4.6 It is important that nominated ARS comply with AMC1 CAMO.A.310(a) to ensure independence in performing his/her work.
- 4.7 Application to obtain Part-CAO.A.095(c) Privileges by Part-CAO's approved by the TM CAD
- 4.8 Applications to obtain the privileges shall be submitted to the Airworthiness Inspectorate on an EASA Form 2.
- 4.9 As part of the application process the CAOs shall accomplish the following:
- Submit the CAE revision (Heading A.9, B.10, C.15, D.11, D.12) procedures and related forms and checklists for review and approval,
 - Submit a list of the proposed Airworthiness Review Staff (ARS),
 - Submit all the documentation related to the competence assessment of the ARS having regards to Part-CAO.A.045 requirements for ARS qualifications, recency and experience,
 - Arrange for the Airworthiness Review Staff to undergo/carry out a supervised airworthiness review with the Airworthiness Inspector,
 - Submit a sample recommendation report, aircraft and documentation report based on ML.A.901 / 903 and their AMC. (Refer also to IAN No. 9 for the content of the recommendation report).
- 4.10 The Airworthiness Inspectorate will reserve the right to carry out documentation and aircraft inspection as necessary both as part of the oversight of the CAO's and as part of the aircraft monitoring.

5 Issue of ARC

5.1 Import of aircraft from outside the EU

A Import of used aircraft with Export CofA / export conformity statement

In this case according to **21.A.174 (b)3(ii)**

A recommendation for the issuance of an ARC pursuant to a satisfactory Airworthiness Review as required by **21.A.174 (b)3(ii)(E)** under the provisions of **M.A.906**.

B Import of used aircraft without Export CofA / export conformity statement

This scenario is referred to in **21.A.174 (d)**:

By way of derogation from point 21.A.174(b)(3)(ii)(A), in exceptional cases and with prior agreement by the competent authority, an application may be made without a statement reflecting the airworthiness status of the aircraft, provided that all the following conditions are met:

1. the competent authority of the Member State of registry is satisfied that the airworthiness statement has not been denied by the former aviation authority because of airworthiness concerns, unless those concerns have been addressed and corrected;
2. there is evidence available to the competent authority of the Member State of registry as to the approved design according to which the aircraft was initially built and delivered;
3. an evaluation programme is developed detailing the investigations which are necessary to compensate for the lack of the airworthiness statement referred to in point 21.A.174(b)(3)(ii)(A);
4. the investigation activities were conducted in accordance with the evaluation programme, and the results have been summarised in an evaluation report;
5. upon request by the competent authority of the Member State of registry, the applicant provides access to, and copies of, any information that was used to generate the evaluation programme and evaluation report.

This basically means:

1. that **no statement** is available from the exporting aviation authority;
2. A recommendation for the issuance of an ARC pursuant to a satisfactory Airworthiness Review as required by **21.A.174 (b)3(ii)(E)** under the provisions of **M.A.906**. and an evaluation report following an evaluation programme (**AMC1 21.A.174(d)**).

5.2 Transfer of aircraft from inside EU

A Transfer of aircraft from inside the EU (other EASA member states) with a valid Part-21 CofA

The provisions of Part-21.A.174 b3(i) apply in such case:

a copy of the CofA and one of the following documents:

a valid airworthiness review certificate (ARC) issued in accordance with Annex I (Part-M) or Annex Vb (Part-ML) to Commission Regulation (EU) No 1321/2014, or with Annex I (Part-ML.UAS) to Delegated Regulation (EU) 2024/1107, as applicable;

a recommendation for the issuance of an airworthiness review certificate pursuant to an airworthiness review in accordance with Annex I (Part-M) to Regulation (EU) No 1321/2014, where the conditions set out in point M.A.901(b)(1) of Annex I (Part-M) to Regulation (EU) No 1321/2014 are not met;

B Transfer of aircraft from inside the EU (other EASA member states) without a valid Part-21 CofA

The provisions of Part-21.A.174 b3(ii) apply in such case.

A statement from the appropriate authority that was responsible for the oversight of the aircraft reflecting the airworthiness status of the aircraft at the time that authority ceased its oversight responsibilities; the mass and balance statement corresponding to the aircraft current configuration, as applicable;

the flight manual if required by the applicable type-certification basis;

historical records necessary to establish the production, configuration and maintenance standard of the aircraft, including all limitations associated with a restricted certificate of airworthiness issued in accordance with point 21.B.327;

a recommendation for the issuance of an airworthiness review certificate pursuant to an airworthiness review in accordance with Annex I (Part-M) to Regulation (EU) No 1321/2014 or an airworthiness review certificate in accordance with Annex Vb (Part-ML) to Regulation (EU) No 1321/2014 or with Annex I (Part-ML.UAS) to Delegated Regulation (EU) 2024/1107, unless it is agreed that the airworthiness review is to be carried out by the competent authority;

the date on which the first certificate of airworthiness was issued and, if the standards set out in Volume III of Annex 16 to the Chicago Convention apply, the CO₂ metric value data

if the former airworthiness certificate of the aircraft was issued in accordance with this Annex but has been subsequently revoked or surrendered, alternatively to the statement required in point

(A), all of the following documentation:

(a) statement containing:

1. the details of the reasons for the revocation or surrender of the airworthiness certificate;
2. the details of how the aircraft has been preserved and maintained since the revocation or surrender of the airworthiness certificate;
3. all other relevant information related to the condition and history of the aircraft;

b) evaluation programme developed and carried out in accordance with points 21.A.174(d)(3) and 21.A.174(d)(4), unless otherwise agreed by the competent authority of the Member State of registry.

6 Evaluation Programme

Refer also to AMC1 21.A.174(d) Application

6.1 The evaluation programme shall be developed, and the investigations detailed in it shall be performed, by:

- (i) an organisation approved in accordance with point CAMO.A.125(g) of Annex Vc (Part-CAMO) or point CAO.A.095(c)(3) of Annex Vd (Part-CAO) to Regulation (EU) No 1321/2014, or in accordance with Annex II (Part-CAO.UAS) to Delegated Regulation (EU) 2024/1107, as applicable;
- (ii) the competent authority of the Member State of registry, only for aircraft of 2 730 kg MTOM and below and upon the acceptance of that authority.

- 6.2 The evaluation programme shall specify the activities to be performed to identify the status of the aircraft with regard to conformity to the approved type design, existing modifications and repairs and maintenance, and continuing airworthiness status. The evaluation programme, if developed by an organisation referred to in the third paragraph, point (i), shall be accepted by the competent authority of the Member State of registry before the evaluation is conducted.'
- 6.3 The evaluation report should at least contain:
- (1) reference to the accepted evaluation programme;
 - (2) a description of the investigation activities performed;
 - (3) a description of the inspection and investigation results;
 - (4) a listing and justification of deviations (if any) from the accepted evaluation programme, including the compensating measures agreed with the competent authority
- 6.4 The evaluation programme has to be accepted by the competent authority of the State of registry importing / transferring in the aircraft.**

AMC1 21.B.326(a)(3) and 21.B.327(a)(3) (Restricted) Certificate of airworthiness
ACCEPTANCE OF THE EVALUATION PROGRAMME BY THE COMPETENT
AUTHORITY

7 Extension of ARC

- 7.1 Extension of the ARC can be done when the conditions specified in M.A. 902 / ML.A.902 are fully met. The ARC can be extended twice for a period of one year, by the CAMO managing the continuing airworthiness of the aircraft when aircraft is continuously managed.
- 7.2 The privileges of the CAMO / CAO / Part-145 to extend twice the validity of ARC are obtained directly with the CAMO / CAE/ MOE approval however for these privileges to be exercised the requirements of CAMO.A.305(f) shall be complied with.
- 7.3 For compliance with CAMO.A.305(f), the CAMO has to nominate and authorise persons who can extend the ARC.
- 7.4 TM CAD expects that CAMO's have a minimum of two persons who are authorised to extend the ARC.
- 7.5 The CAMO has to have a procedure for the nomination and authorisation of personnel extending the ARC and a procedure for the extension of the ARC itself. This should be done in Part 4 of the CAME.
- 7.6 The CAMO / CAO / Part-145 shall issue an authorisation number for the nominated staff to be entered in the ARC Form 15a/b/c at the time of extension.
- 7.7 In accordance with CAMO.A.125. a copy of any airworthiness review certificate issued or extended shall be sent to TM CAD **within 10 days**.