

## Information and Advisory Notice No. 09

Issue No: 2 Dated: 18 December 2018

# Recommendations for the Issue of Airworthiness Review Certificates

## Introduction

This IAN serves as a guideline to the organizations approved in accordance with Commission Regulation (EU) No 1321/2014 Annex I (Part-M) for submission to TM CAD of recommendations for the issuance of an Airworthiness Review Certificates (ARC), EASA Form 15a.

## General

There are **four basic 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:

- Aircraft already on the Maltese Civil Aviation Register, or
- Importation of used aircraft to Malta from a third country (non-EU/EASA member). (Refer also to IAN 02), or
- Used aircraft transferred to Malta from another EU member state with a non valid ARC or with the Certificate of Airworthiness surrendered or revoked, or
- Aircraft not in a controlled environment according to M.A.901 (b).

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, thus no recommendation for the issuance of an ARC is necessary. **(Refer also to IAN 02)**

The requirements for recommendations in relation to civil aircraft already registered in Malta are stipulated in M.A. 710 and 901 (d), which requires that for all aircraft used in commercial air transport and aircraft above 2730 kg MTOM, except balloons, which:

- (i) are not in a controlled environment, or
- (ii) whose continuing airworthiness is managed by a continuing airworthiness management organization (CAMO) that does not hold the privilege to carry out airworthiness reviews, the Airworthiness Review Certificate shall be issued by the competent authority upon satisfactory assessment based on a recommendation made by a CAMO, appropriately approved with Part-M M.A. 711(b), sent together with the application from the aircraft owner or operator. This recommendation shall be based on an airworthiness review carried out satisfactorily in accordance with point M.A.710.

In this case TM CAD would require that the submitted recommendation, in order to be acceptable, contains at least the items listed in AMC M.A.901 (d) and demonstrate compliance with M.A.710 a) and c).

The requirements for recommendations in relation to used imported aircraft from a third country (non-EU/EASA member) are stipulated in M.A.904, which requires that when satisfied that the aircraft is in compliance with the relevant requirements, the CAMO shall send a documented recommendation for the issuance of an ARC to the member state of Registry.

In this case TM CAD would require that the submitted recommendation, in order to be acceptable, contains at least the items listed in AMC M.A.904 (b) and demonstrate compliance with M.A.710 a) and c).

### **Details concerning M.A.710 and AMC M.A.901 (d) 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.

(a) General information

- *M.A. Subpart G organization information.*

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

- *owner/lessee information*

Full name of the owner/lessee/operator.

- *date 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.

(b) Aircraft information

With regard to the weight 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.

(c) Documents accompanying the recommendation

- *copy of the registration papers*

No papers are required to be submitted.

- *copy of owner’s request for a new ARC*

The application mentioned in “General” above, Form AITP-C03 Appendix II.

(d) Aircraft status

- *aircraft total time and cycles*

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

- *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.

(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.

Aircraft survey should also focus on the proposed aircraft utilization/operating requirements. (ETOPS/ LVO/ PBN/ RVSM/ CAT.IDE/ Part-26 etc.)

(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
- corrective action plan for those with no immediate impact on the airworthiness of the aircraft but could lower the safety standard and possibly hazard the flight safety.

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 AMC 901(d) and (g))

*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 aircraft in its current configuration complies with the following:*

- *airworthiness directives up to the latest published issue.*

The date up to which the AD status was established should be identified.

- *type certificate datasheet (TCDS)*

Latest revision of the TCDS should be used.

- *maintenance programme (AMP)*

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

- *component service life limitations – self evident.*

- *the valid weight and centre of gravity schedule reflecting the current configuration of the aircraft*

The weight and centre of gravity schedule reference should be indicated.

- *Part-21 for all modifications and repairs* – self evident.

- *the current flight manual including supplements*

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

- *operational requirements*

Any operational requirement applicable to the aircraft, e.g. LVO, RVSM, ETOPS etc. should be indicated.

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.

*The statement should also confirm that all of the above is properly entered and certified in the aircraft continuing airworthiness record system and/or in the operator's technical log* - self evident.

### **Details concerning AMC M.A.904 (b) items**

Following is interpreting and explanatory information regarding **some** of the AMC M.A.904 (b) 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.

(a) All the information set forth by AMC M.A. 901 (d) and (g)

The interpretations and explanations provided under the previous paragraph of this IAN are fully applicable for this sub-paragraph.

(b) Aircraft information

With regard to the comparison of the prior maintenance programme with the proposed new maintenance programme an assessment of any bridging maintenance should be made which will allow appropriate transition from the prior to the proposed programme. All the other items listed in this sub-paragraph are self evident. Latest revisions of the TC and TCDS should be used.

(c) Documents accompanying the recommendation

- *copy of the application*  
Form AITP-C03 Appendix II

- *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.

- *copy of the approvals of the flight manuals and its supplements*

As the recommendation in this scenario is made in conjunction with an application for a TM CAD C of A issue, the whole flight manual and all associated supplements are required to be submitted, including their approval pages. Refer to IAN 02 for matters regarding issue of a TM CAD C of A.

- *list of the ADs incorporated up to the latest published issue*

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

- *proposed new maintenance programme* – The proposed AMP should be submitted for approval.

- *status of all service life limited components*

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

- *the valid weight and center of gravity schedule reflecting the current configuration of the aircraft* - self evident.

- *Part-21 approval reference for all modifications and repairs*

EASA or Part-21 approved organisations' references of approval of all modifications and repairs carried out on the aircraft (for more information on the subject of repairs and changes to type design refer to IAN 04).

(d) Maintenance

- *a copy of the work packages requested by the subpart G organization 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.

(e) Aircraft check flight

- *a copy of the check flight report* – self evident.

- (f) 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.*

## Administrative issues

ARC Recommendations shall be sent by recommending Part-M organization in original hard copy to the Airworthiness Inspectorate accompanied with a covering letter from the aircraft operator. All associated documentation when the original is not required may be provided in digital format (CD/DVD or equivalent). These recommendations shall be sent in advance of the expiry date of the ARC to avoid delays and possible invalidity of the Certificate of Airworthiness.

TM CAD shall issue an ARC within 30 days of the submission of the application from the owner/operator and accompanying recommendation, upon verification that through the airworthiness review, the recommending Part-M Subpart G organization has carried out a complete and accurate assessment of the airworthiness of the aircraft. TM CAD may request corrective actions to be implemented, if deemed necessary, before the issuance of the ARC. In such case, the period of 30 days may be extended to allow TM CAD to assess the implementation of the requested corrective actions.

## **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 Part-M Subpart G organization will be informed with sufficient prior notice so that they may organize themselves in accordance with M.A.901 (j).