121 North Henry Street
Alexandria, VA 22314-2903
T: 703 739 9543 F: 703 739 9488
arsa@arsa.org www.arsa.org

# Change 7 to the Maintenance Annex Guidance issued under the U.S.-EU Bilateral Aviation Safety Agreement

On Nov. 18, 2019 EASA published change 7 to the Maintenance Annex Guidance (MAG) associated with the bilateral aviation safety agreement (BASA) between the United States and the European Union (U.S.-EU). Repair stations have 90 days to implement changes, which means no later than Feb. 17, 2020.

This document reviews the significant changes made to the MAG and related impacts on the manual supplements of U.S. repair stations holding EASA approval under the bilateral.

*Notes for Reading the Document*

(1) For each update, deletion or change, the relevant section and paragraph of the previous MAG ("MAG 6") is presented alongside the section and paragraph of the newly released version ("MAG 7"). Yellow highlights have been used to call out key text.
(2) The "impacts on EASA Supplement" described in the document do not necessarily mean that current holders of EASA approval under the MAG must make changes to their supplements or manuals. Users must review each impact against their own documentation and procedures to determine necessary action.
(3) The EASA supplement section references are from ARSA's Model RSQM EASA Supplement.

**If you have comments or questions regarding this draft document – which was issued by ARSA for industry comment on Dec. 27, 2019 – contact Brett Levanto (brett.levanto@arsa.org).**

**Change 7 to the Maintenance Annex Guidance issued under the U.S.-EU Bilateral Aviation Safety Agreement**
Significant Changes and Related Impacts

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | A | **EASA Visit Report AMO (SIS Form 8)**: "The repair station must specify the items to be contracted and have procedures in place to ensure that contractors meet the terms of EASA Special Conditions that is, using an EASA-approved Part-145 organization or, if using an organization which does not hold an EASA Part-145 approval, the repair station returning the product to service is responsible for ensuring its airworthiness." | Section | A | **EASA Visit Report AMO (SIS Form 8):** "The repair station must specify the approved maintenance functions to be contracted and have procedures in place to ensure that contractors meet the terms of EASA Special Conditions that is, using an EASA-approved Part-145 organization or, if using an organization which does not hold an EASA Part-145 approval, the repair station approving the product for return to service is responsible for ensuring its airworthiness." | None. This section of the MAG is associated with the authorities; it deals with the clarification on contracted maintenance functions found in Section B, Appx 1, A(16), Note 1 on page 108-109 discussed below. |
| Part | Appx 2 | | Part | Appx 2 | | |
| ¶ | 17 | | ¶ | 17 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 44 | | Page | 44 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | A | **EASA Visit Report AA**: "Are the AA Audit Report 2 recommendations submitted within the 30 day period specified in Section C?" | Section | A | **EASA Visit Report AA**: "Has the AA conducted an audit for compliance to the FAA Special Conditions and the FAA Supplement?" | None. This section of the MAG is associated with the authorities conducting oversight. |
| Part | Appx 4 | | Part | Appx 4 | | |
| ¶ | 5 | | ¶ | 5 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 51 | | Page | 51 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | A | **The AMO has requested**: "1. Additional Fixed Location (OpSpec Paragraph D101)" | Section | A | **The AMO has requested**: "1. Additional Fixed Location (OpSpec Paragraph A101)" | None. This section of the MAG is associated with the authorities. It relates to the text added in Section B, Part V, Paragraph 1's note on page 88 of MAG 7, which is explained below. |
| Part | Appx 6 | | Part | Appx 6 | | |
| ¶ | Part 3 | | ¶ | Part 3 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 65 | | Page | 64 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | A | **Compliance with Special Conditions and MAG Requirements**: "Procedures in place to verify that all contracted/sub contracted activities include provisions…." | Section | A | **Compliance with Special Conditions and MAG Requirements**: "Procedures in place to verify that all maintenance functions contracted/subcontracted include provisions…." | None. This section of the MAG is associated with the authorities; it deals with the attempt to clarify contracted maintenance functions found in Section B, Appx 1, A(16), Note 1 on page 108-109 discussed below. |
| Part | Appx 8 | | Part | Appx 8 | | |
| ¶ | 13 | | ¶ | 13 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 73 | | Page | 72 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "The FAA will advise EASA of any Level 1 findings or failure to comply with 14 CFR part 145 or EASA special conditions that would result in an enforcement action. Reports shall be made on an EASA Form 9." | Section | B | "The FAA will advise EASA of Level 1 findings immediately and without undue delay leading to enforcement actions and findings related to the EASA special conditions. Reports shall be made on an EASA Form 9." | None. This section of the MAG is associated with the authorities; it deals with the timing of reporting "Level 1" findings "leading to enforcement actions" |
| Part | II | | Part | II | | |
| ¶ | 2.4 | | ¶ | 2.4 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 83 | | Page | 81 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "When the FAA has reason to take certificate action against an EASA-approved 14 CFR part 145 repair station, which may result in revocation, limitation, or suspension, in whole or in part, of the approval…." | Section | B | "When the FAA has reason to take certificate action against an EASA-approved 14 CFR part 145 repair station, which may result in revocation or suspension, in whole or in part, of the approval…." | None. Although if there is verbiage in the supplement, it should mirror the new language here. |
| Part | II | | Part | II | | |
| ¶ | 5.1 | | ¶ | 5.1 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 84 | | Page | 83 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | [New text added in Change 7] | Section | B | "**For both cases listed below [RS Not Holding OpSpec D100 and RS Holding OpSpec D100], the EASA approval privileges can be used only for urgent defect rectification work (i.e., Aircraft on Ground (AOG)) performed on EU-registered aircraft or components fitted to such aircraft.**" (Emphasis in original.) | 2.1.6 – Working Away From a Fixed Location<br>The new Note clarifies paragraphs 1.1 and 1.2 of this Section of the MAG.<br>An FAA-certificated repair station can perform work under its EASA authorization away from its "fixed location" *only* to perform "urgent defect rectification work (i.e., Aircraft on Ground (AOG)) on EU-registered aircraft or components fitted to such aircraft:"<br>✓ If the repair station holds FAA OpSpec D-100, the work can be done on a recurring basis, with prior notice to the repair station's FAA ASI if within the territory of the United States; and, with prior notice to (but not prior permission from) EASA if outside the territory of the United States.<br>✓ If the repair station does not hold FAA OpSpec D-100, it can only |
| Part | V | | Part | V | | |
| ¶ | 1 | | ¶ | 1 | | |
| Sub ¶ | Note | | Sub ¶ | Note | | |
| Page | 89 | | Page | 88 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | work away from its fixed location on E.U.-registered aircraft (inside and/or outside the U.S.) on a one-time only basis and only with prior permission from EASA.<br>*A U.S. based repair station without D-100 would also have to obtain written permission from the FAA – see, 14 CFR § 145.203(a).*<br>If your repair station works away from the fixed location on a recurring basis, it should have OpSpec D-100; ensure your procedures are aligned with this clarification.<br>If you are planning to work on an EU-registered aircraft away from the fixed location on a case-by-case basis, ensure your procedures include requesting permission from both authorities as required by 14 CFR and the MAG. |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "FAA revocation of the 14 CFR part 145 Certificate automatically invalidates the EASA Part-145 Approval Certificate. There is no right of appeal to EASA when the FAA revokes, suspends, or amends (limits) any FAA 14 CFR part 145 Repair Station Certificate or rating." | Section | B | "FAA revocation of the 14 CFR part 145 Certificate automatically invalidates the EASA Part-145 Approval Certificate. There is no right of appeal to EASA when the FAA revokes or suspends any FAA 14 CFR part 145 Repair Station Certificate or rating." | None. This merely acknowledges that the actions of the authorities if the FAA revokes or suspends a certificate. "Limitations" would be handled as a change in the repair station certificate or operations specifications. |
| Part | VI | | Part | VI | | |
| ¶ | 1 | | ¶ | 1 | | |
| Sub ¶ | 1.2 | | Sub ¶ | 1.2 | | |
| Page | 90 | | Page | 89 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "If the holder of the Repair Station Certificate does not accept the EASA Executive Director decision about suspension/revocation, he/she may appeal according to the related appeal provisions of Regulation (EC) No. 216/2008." | Section | B | "If the holder of the Repair Station Certificate does not accept the EASA Executive Director decision about suspension/revocation, he/she may appeal the decision." | None. This states the method of appealing an EASA revocation or suspension. |
| Part | VII | | Part | VII | | |
| ¶ | 1 | | ¶ | 1 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 91 | | Page | 90 | | |

**Change 7 to the Maintenance Annex Guidance issued under the U.S.-EU Bilateral Aviation Safety Agreement**
Significant Changes and Related Impacts

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "An acceptable statement for this paragraph would be: * * * 'It is further understood that EASA reserves the right to revoke the Approval Certificate if EASA considers that procedures are not followed or standards not upheld.'" | Section | B | "An acceptable statement for this paragraph would be:* * * 'It is further understood that EASA reserves the right to revoke the Approval Certificate if EASA determines that procedures are not followed or standards not upheld.'" | **Appendix A – Accountable Manager's Commitment Statement**<br>Ensure the statement in your supplement follows the new language regarding EASA's determination. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A | | ¶ | A | | |
| Sub ¶ | (4)(c) | | Sub ¶ | (4)(c) | | |
| Page | 95 | | Page | 94 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "NOTE: A critical component is defined as a part identified as critical by the design approval holder during the validation process, or otherwise by the exporting authority. Typically, such components include parts for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations section or certification maintenance requirements of the manufacturer's maintenance manual or Instructions for Continued Airworthiness.<br>"(4) EASA shall accept any critical component repair design data from a TC/STC holder, regardless of the State of Design of the product, if: (i) EASA has certificated/validated the product, and<br>(ii) The FAA is the authority of the State of Design for the repair design data. (iii) In these circumstances, repair design data are considered to be EASA approved following its approval under FAA's system. This process does not require application to EASA or compliance findings to the EASA certification basis.<br>"(5) Repair design data on critical components, developed by organizations/persons that are not the TC/STC Holder, shall be submitted to the Agency for approval following the | Section | B | [Text omitted in Change 7] | **2.2. – Maintenance Data.**<br>MAG 7 omits the definition of "critical component" and related sub ¶s 8(c)(4) on acceptance of critical component repair design data, and 8(c)(5) concerning approval of critical component repair design data developed by an entity other than the TC/STC holder. These deletions are related to MAG 7's consolidation and reorganization of references to component repair at Section B, Appx 1, ¶ A, subparagraph 10(n) at pp.103-104 and changes to the Technical Implementation Procedures (TIP) that align design and production requirements among the countries with the MAG.<br>*ARSA is unsure if any changes must be made to supplements; it is seeking EASA/FAA clarification on:*<br>✓ The repair data provisions in TIP 6 at page 28 to page 30; ¶ 3.3.5 "Design Data for Repairs".<br>✓ Alteration Data – TIP 6 Paragraph 2.3 on Page 22. "Any other FAA approved design changes as identified under ¶ 3.2 for products and articles for which the U.S. is the State of Design."<br>✓ Paragraph 3.2 – "Acceptance" on |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A | | ¶ | A | | |
| Sub ¶ | 8(c)(3) Note | | Sub ¶ | 8(n)(4) | | |
| Page | 98 | | Page | 103 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | standard application procedure, with an EASA Form 31. Applicants do not need to hold a DOA if the repair data has been approved by the FAA." | | | | Page 25, ¶ (6) Design data for an alteration, except for critical components, see ¶ 3.3.6 "Design Data for Aircraft Imported into the EU."] |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "New parts that were received into inventory prior to October 1, 2016 must, at a minimum, have a document or statement (containing the same technical information as an FAA Form 8130-3) issued by the PAH or supplier with direct ship authority. | Section | B | "New parts that were received into inventory prior to October 1, 2016 must, at a minimum, have a document or statement (containing the same technical information as an FAA Form 8130-3) issued through an approved design, the PAH, or supplier with direct ship authority". | **2.3.1 – Components Eligible for Installation** The addition of "through an approved design" acknowledges that parts eligible for grandfathering include those "issued through", e.g., produced by or for a TC, STC, or other design approval holder that entered inventory before Oct 1, 2016.<br>If you are obtaining components without or missing required documentation, ARSA's form E100 is a methodology for receiving them under this provision. *See the Sept. 26, 2016 update on arsa.org/mag.* |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A | | ¶ | A | | |
| Sub ¶ | (10)(k) Note | | Sub ¶ | (10)(k) Note | | |
| Page | 100 | | Page | 98 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "iii) For new components released by a Canadian-PAH, release must be on the Transport Canada Civil Aviation (TCCA) Canadian Form One as a new part." | Section | B | [Text omitted in Change 7] | **2.3.1 – Components Eligible for Installation**<br>Discussion of Canadian approved components is removed from the FAA-EASA MAG because the provisions are covered under the TCCA-EASA bilateral. *See* www.tc.gc.ca/en/services/aviation/aircraft-airworthiness/international-agreements-arrangements/maintenance-annex-guidance-eu.html.<br>New parts from TCCA are eligible for installation on an EU-registered aircraft by an FAA-certificated repair station holding EASA approval because each authority has bilateral agreements with the others (FAA-EASA; FAA-TCCA; |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(10) | | ¶ | A(10) | | |
| Sub ¶ | (k)(1)(a) | | Sub ¶ | (k)(1)(a) | | |
| Page | 101 | | Page | 99 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | EASA-TCCA) to accept new articles produced under the production approval of the respective authority.<br>No changes to Supplements should be required; however, if "triple release" is referenced it should be removed to make your supplement consistent with the MAG. |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | [New text added in Change 7] | Section | B | "vii) Acceptable components based on provisions of other Bilateral Agreements are not contained in this guidance. Please refer to the individual Agreements or the summary table published on the EASA Web site: https://www.easa.europa.eu/sites/default/files/dfu/Parts" | **2.3.1 – Components Eligible for Installation**<br>See immediately above. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(10) | | ¶ | A(10) | | |
| Sub ¶ | (k)(1)(a) | | Sub ¶ | (k)(1)(a) | | |
| Page | 101 | | Page | 100 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "iv) A Canadian Form One issued as a maintenance release must accompany used components from a Canadian EASA-approved maintenance organization." | Section | B | "iv) Acceptable components based on provisions of other Bilateral Agreements are not contained in this guidance. Please refer to the individual Agreements or the summary table published on the EASA Web site: https://www.easa.europa.eu/sites/default/files/dfu/Parts%20Table%20EASA%20MMT%20Final_FS1.1%2B1.4.pdf" | **2.3.1 – Components Eligible for Installation**<br>As discussed above, references to bilaterals with other countries have been removed and this paragraph will allow recognition of additional bilaterals without changing the MAG. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(10) | | ¶ | A(10) | | |
| Sub ¶ | (k)(2)(a) | | Sub ¶ | (k)(2)(a) | | |
| Page | 102 | | Page | 100 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "NOTE: Canadian EASA-approved maintenance organizations will specify the EASA release statement and their EASA approval number in the remarks block of Canadian Form One." | Section | B | [Text omitted in Change 7] | **2.3.1 – Components Eligible for Installation**<br>See immediately above. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(10) | | ¶ | A(10) | | |
| Sub ¶ | (k)(2)(a)(iv) NOTE | | Sub ¶ | (k)(2)(a)(iv) | | |
| Page | 102 | | Page | 100 | | |

**Change 7 to the Maintenance Annex Guidance issued under the U.S.-EU Bilateral Aviation Safety Agreement**
Significant Changes and Related Impacts

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "v) Used components that have been issued a triple release (i.e., certifying compliance with FAA, EASA, TCCA requirements) on an EASA Form 1 as a maintenance release are acceptable." | Section | B | [Text omitted in Change 7] | **2.3.1 – Components Eligible for Installation**<br>As discussed above, references to "triple releases" have been removed from the MAG.<br>Review your supplement to remove references to "triple releases." Acceptable documentation now includes:<br>EASA Form 1 dual for EASA and the FAA<br>TCCA Form 1 dual for EASA and TCCA<br>FAA Form 8130-3 dual for EASA and the FAA (and TCCA) |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(10) | | ¶ | A(10) | | |
| Sub ¶ | (k)(2)(a) | | Sub ¶ | (k)(2)(a) | | |
| Page | 102 | | Page | 100 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "* For the purpose of the table above, triple release mentioned in subparagraph v above has the same status as EASA Form 1 Dual." | Section | B | [Text omitted in Change 7] | **2.3.1 – Components Eligible for Installation**<br>As discussed above, references to "triple releases" have been removed from the MAG. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(10) | | ¶ | A(10) | | |
| Sub ¶ | I | | Sub ¶ | I | | |
| Page | 103 | | Page | 101 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | [New text added in Change 7] | Section | B | "Release statements for cases where compliance with both regulatory systems cannot be met (parts installed with single release, ADs not being complied with)" | **2.3.1 – Components Eligible for Installation**<br>The new language in MAG 7 adds the model release statements for when working on an article that does not have a U.S. design approval, i.e., a type certificate for the aircraft, aircraft engine or propeller was not issued by the FAA (a design was only issued by EASA), e.g., the Sukhoi 100.<br>If you are working on such components, amend your instructions for completing FAA Form 8130-3 to ensure that block 14a only checks "other regulations |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(10) | | ¶ | A(10) | | |
| Sub ¶ | | | Sub ¶ | m | | |
| Page | 104 | | Page | 102 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | specified in Block 13" and *does not* check that the work complies with Sec. 43.9.<br>The MAG provides language to include in block 12 of the 8130-3 that should be included in the supplement IF your repair station is working on components that are ONLY type certificated by EASA.<br>*ARSA is seeking EASA/FAA acceptance of alternative language that more clearly reflects the facts: The alternative language ARSA is requesting the authorities find acceptable is:*<br>*""Certifies that the work specified in Block 11/12 was carried out in accordance with EASA Part 145 and in respect to that work the component is considered ready for release to service under EASA Part 145 approval no._____.*<br>*This article is not eligible for installation on a U.S.-registered aircraft.""* |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | [New text added in Change 7] | Section | B | "Release Procedure for Components That Are Used Only in an EASA-approved Design (TC/STC)…." | **2.3.1 – Components Eligible for Installation**<br>As discussed immediately above, MAG 7 includes new instruction concerning release of components used only in an EASA-approved design.<br>IF the repair station is working on an article that is ONLY eligible for installation on an EASA-only approved design in addition to adjusting language on the FAA Form 8130-3, only for such components, paragraph 10.n.3 of MAG 7, Section B, Appendix 1 states: |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(10) | | ¶ | A(10) | | |
| Sub ¶ | | | Sub ¶ | n | | |
| Page | 104-105 | | Page | 103 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | "The repair station's accountable manager will submit to the FAA responsible Principal Inspector, in writing, a request to perform maintenance, preventive maintenance, and/or alterations on component parts to be installed on non-U.S. type-certificated aircraft. The written request must include a revised EASA supplement listing the component parts, the scope of maintenance that will be performed on the parts, including a self-assessment of the following elements: tooling, equipment, data used, training, facilities, qualified personnel, etc."<br>After which you must await EASA response. |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | ". . . when serious defects are found in EU-registered aircraft or components received from an EU customer, the defects must be reported to EASA, the aircraft/component design organization, and the customer or Operator within 72 hours." | Section | B | "when serious defects are found in EU-registered aircraft or components received from an EU customer, the defects must be reported to EASA, the aircraft/component design organization, the authority of the state of registry, and the customer or Operator within 72 hours". | **2.3.6 – Reports of Serious Failures, Malfunctions or Defects**<br>Update supplements to ensure the State of Registry (if known) is notified. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(13) | | ¶ | A(13) | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 106 | | Page | 105 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "report . . . through:<br>• EASA online platform,<br>• Occurrence Reporting Form,<br>• FAA Service Difficulty Report, or<br>• FAA SUP report." | Section | B | "report . . . through the EASA online platform: http://www.aviationreporting.eu/ | **2.3.6 – Reports of Serious Failures, Malfunctions or Defects**<br>Update the EASA supplement to submit SDRs only through the EASA online platform (http://www.aviationreporting.eu/).<br>Previously authorized methods of reporting to EASA are no longer acceptable. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(13) | | ¶ | A(13) | | |
| Sub ¶ | a | | Sub ¶ | a | | |
| Page | 106 | | Page | 105 | | |

**Change 7 to the Maintenance Annex Guidance issued under the U.S.-EU Bilateral Aviation Safety Agreement**
Significant Changes and Related Impacts

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "The QAS should include all the contracted work in accordance with guidance given in Item 16 of the Supplement." | Section | B | "The QAS should cover all the contracted maintenance functions work in accordance with guidance given in Item 16 of the Supplement." | **2.4 – Independent Audit System**<br>The supplement can include the phrase "maintenance functions" in relation to contracted work.<br>The new language merely focuses the quality assurance system audits on ensuring the maintenance function list is approved and the maintenance functions contracted are (1) to an EASA-approved maintenance organization or repair station and (2) the maintenance function contracted is the depicted in the exact same language as the approved maintenance function list verbiage. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(14) | | ¶ | A(14) | | |
| Sub ¶ | c | | Sub ¶ | c | | |
| Page | 107 | | Page | 106 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | [New text added in Change 7] | Section | B | "The organization intending to contract the audit function should contact EASA at foreign145@easa.europa.eu for further guidance concerning qualification and training requirements." | **2.4 – Independent Audit System**<br>For repair stations that are using outside organizations to perform required audits, guidance from EASA at the email address must be obtained and incorporated into your EASA supplement. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(14) | | ¶ | A(14) | | |
| Sub ¶ | (e)(1)(vi) | | Sub ¶ | (e)(1)(vi) | | |
| Page | 108 | | Page | 107 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "When the customer and repair station sign a contract for maintenance, the agreement must confirm that hangar space will be available at the time of maintenance and alterations." | Section | B | "When the customer and repair station sign a contract for maintenance, the agreement must confirm that hangar space will be available at the time of base maintenance and alterations." | **2.1.3 – Housing**<br>This text clarifies that the requirement for hangar space applies to base maintenance (and, by implication, not to line maintenance).] |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(15) | | ¶ | A(15) | | |
| Sub ¶ | a | | Sub ¶ | a | | |
| Page | 109 | | Page | 108 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "When part of the maintenance is contracted to another organization, the repair station must ensure that the other organization is approved to EASA Part-145 for the maintenance they carry out (contracting). **If maintenance is** | Section | B | "When part of the maintenance is contracted to another organization, the repair station must ensure that the other organization is approved to EASA Part-145 for the maintenance function. To be considered a contract maintenance | **2.1.2 – Contracting Maintenance Functions**<br>The new language tries to state that work performed by another "appropriately certificated entity" (in EASA-speak that means an EASA |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(16) | | ¶ | A(16) | | |
| Sub ¶ | Note 1 | | Sub ¶ | Note 1 | | |
| Page | 109 | | Page | 108-109 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | **contracted to a non-EASA-approved organization (subcontracting), then this is considered to be a Non–certificated Facility. In such a case, the repair station returning the product to service is fully responsible for ensuring its airworthiness.**" (Emphasis in original.) | | | function that requires FAA approval, the repair station must meet both of the following conditions: (1) entering into an agreement with another person or entity (FAA-certificated or non-certificated and EASA- approved or non-approved) to perform maintenance functions on an article; and (2) the repair station chooses to exercise the privileges of its certificate and assumes responsibility for the work performed by the contracted person or entity. **If maintenance is contracted to a non-EASA-approved organization, then this is considered to be a Non–certificated Facility. In such a case, the repair station approving the product for return to service is fully responsible for ensuring its airworthiness**. (Emphasis in original.) | approved repair station or AMO) may not be contracting maintenance services. This only manages to confuse people.<br>The bottom line is that EASA requires any non-EASA contractor to be treated as a non-certificated source.<br>Ensure your supplement and related procedures reflects this ongoing requirement. ARSA's Model RSQM EASA Supplement already notes that the repair station will ensure maintenance vendors are EASA approved OR they will be handled as non-certificated as set forth in the RSQM. |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "EASA recognizes 14 CFR part 145 requirements for the Repair Station Manual to contain a list of all contractors utilized by the Repair Station and the contracting function accepted by the FAA as part of the Repair Station Manual. The list contains the name, physical address, and certificate and function to be performed. EASA can accept this practice when the list identifies, by an asterisk or other means of identification, those contractor(s) the Repair Station will use to support maintenance activities for aircraft registered in EU or aeronautical products to be installed on such aircraft. **The list should identify the contractors that hold an EASA Part-145 certificate and must also be made available to EASA on request.**" (Emphasis in original.) | Section | B | "EASA recognizes that 14 CFR part 145 permits the repair station to contract maintenance functions provided the maintenance functions are approved by the FAA and the originating repair station exercises the privileges of its certificate by assuming responsibility for the work performed by providing the approval for return to service. Title 14 CFR part 145, section 145.217 requires the repair station, in a format acceptable to the FAA, to provide the name of each outside facility to whom the repair station contracts maintenance functions and the type of certificate and ratings held, if any. EASA can accept this practice when the repair station identifies those contractor(s) the repair station will use to support maintenance activities for aircraft registered in the EU or aeronautical products to be installed on | **2.1.2 – Contracting Maintenance Functions**<br>The new language does not change the underlying requirements related to keeping the maintenance vendor list required by<br>§ 145.217(a)(2) and for the sake of the MAG ensuring those that are *not* EASA approved can be distinguished.<br>Members may obtain the ARSA Model Forms Manual and Forms, Form 312 can be used to address this requirement. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(16) | | ¶ | A(16) | | |
| Sub ¶ | a | | Sub ¶ | a | | |
| Page | 110 | | Page | 109 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | such aircraft. **The repair station shall establish a list identifying the contractors that hold an EASA Part-145 certificate and make it available to EASA on request**." (Emphasis in original.) | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "Indicate that any non-EASA- approved contractor to which work is contracted must be under the control of the Repair Station's QAS. Additionally, the Repair Station must inspect each item on which contracted work has been performed for compliance with this supplement." | Section | B | "Indicate that any non-EASA-approved contractor to which work is contracted must be under the control of the Repair Station's QAS. Compliance with this supplement must be ensured for each contracted maintenance function." | **2.1.2 – Contracting Maintenance Functions**<br>**2.4 – Independent Audit System**<br>MAG 7 replaces the single word "inspect" with broader language; this aligns with the verbiage in § 145.217(b)(3), which requires work by non-certificated sources be verified by "inspection or test".<br>Procedural and product audits under the QAS in the supplement must include elements on contracted work. One element is to ensure you know which contractors hold FAA and EASA certificates.<br>Ensure the verbiage used in the approved maintenance function list language is exactly the same as is used to comply with § 145.217(a)(2)(i), that is "The maintenance functions contracted to each outside facility." |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(16) | | ¶ | A(16) | | |
| Sub ¶ | (b)(2)(ii) | | Sub ¶ | (b)(2)(ii) | | |
| Page | 110 | | Page | 109 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | ". . . if the Repair Station contracts functions to another organization that is EASA-approved, the contractor is responsible for approving the return to service for each item on which it has worked." | Section | B | ". . . if the Repair Station sends an article to another organization that is EASA-approved and FAA-certificated, and that person or entity exercises the privileges of its certificate by assuming responsibility for approving for return to service each item on which it has worked, that process is not considered contracting a maintenance function for purposes of the responsibilities of the originating Repair Station." | **2.1.2 – Contracting Maintenance Functions**<br>The new language merely points out that each FAA-EASA authorized repair stations is responsible for the work it performs and approves for return to service.<br>However, do not be fooled, the contracting repair station must still |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(16) | | ¶ | A(16) | | |
| Sub ¶ | (b)(3)(i) | | Sub ¶ | (b)(3)(i) | | |
| Page | 110 | | Page | 110 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | | ensure the work performed by any other "person", including "certificated" contractor was performed to the contract's (and any air carrier) requirements.<br>Additionally, an approval for return to service is only for the work performed and FAA Form 8130-3 clearly states that the installer is always responsible for determining "eligibility for installation."<br>(Additionally, the definition of maintenance in § 1.1 includes "replacement of parts", which means a repair station cannot install a "bad" part and do "good" maintenance.)<br>While repair stations may take responsibility for the work they perform, the contracting repair station/installer must ensure the work was as requested and does not have obvious damage. So at a minimum, a visual inspection is always required when an article is returning from a contract maintenance vendor—whether that person is certificated or considered non-certificated by either EASA or the FAA. |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | B | "Describe the procedures the Repair Station will use to ensure that contractors comply with operators' manuals, manufacturers' manuals, and Instructions for Continued Airworthiness." | Section | B | "Describe the procedures the Repair Station will use to ensure that contractors comply with operators' manuals, manufacturers' manuals, and Instructions for Continued Airworthiness for the maintenance functions performed." | **2.1.2 – Contracting Maintenance Functions**<br>The language connects the ICA requirements for a contractor to the contracted functions identified under the supplement; the contractor need not have "all" manuals or instructions, only those pertaining to the work performed. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(16) | | ¶ | A(16) | | |
| Sub ¶ | (b)(5)(ii) | | Sub ¶ | (b)(5)(ii) | | |
| Page | 111 | | Page | 111 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | [New text added in Change 7] | Section | B | **"The recurrent human factors training shall not be a simple repetition of the initial training. Instead, it shall be built upon errors/lessons learned and the experiences within the organization (or group of organizations). This should help ensure that the results of internal quality audits and occurrence reports are brought to the attention of all staff."** (Emphasis in original.) | **1.6 – Human Factors**<br>The new text requires the repair station's human factors training program utilize "errors/lessons learned" in development, selection and administration of recurrent human factors training.<br>Therefore, product and procedural audits established under the QAS for MAG compliance need to incorporate and communicate "lessons learned" for recurrent training.in human factors.<br>Though the MAG does not specify a timeframe for accomplishment of recurrent training, ARSA encourages members to build human factors into annual training requirements – the association's Model Supplement reflects this annual recurrence for training. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(17) | | ¶ | A(17) | | |
| Sub ¶ | | | Sub ¶ | Note | | |
| Page | 112 | | Page | 111 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | "All line stations exercising the privileges of the EASA Part-145 approval must be listed in the EASA supplement together with associated operator, aircraft type, location, and contract specifying the scope of work for that particular operator." [New text added in Change 7] | Section | B | "All line stations exercising the privileges of the EASA Part-145 approval must be listed in the EASA supplement together with associated operator, aircraft type, location, and contract specifying the scope of work for that particular operator. This contract shall also contain the mutually agreed training requirements (between each individual operator and the repair station) for the certifying staff that will perform the approval for return to service." | **2.1.5 – Line Stations**<br>The new text adds a requirement that contracts for work specify training requirements for staff who will approve return to service. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(18) | | ¶ | 18 | | |
| Sub ¶ | e | | Sub ¶ | (e)(2) | | |
| Page | 112 | | Page | 112 | | |

**Change 7 to the Maintenance Annex Guidance issued under the U.S.-EU Bilateral Aviation Safety Agreement**
Significant Changes and Related Impacts

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | B | [New text added in Change 7] | Section | B | **"For both cases listed below, the EASA approval privileges may be used only for urgent defect rectification work (i.e., AOG) performed on EU-registered aircraft or components fitted to such aircraft."** (Emphasis in original.) | **2.1.6 – Working Away From a Fixed Location**<br>As mentioned above, the MAG has new language on repair stations working away from a fixed location.<br>Supplement language related to working away, whether the repair station does so for special circumstances only or on a recurring basis, should correctly reflect the limitation that the work may only be for "urgent defect rectification." |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | A(19) | | ¶ | A(19) | | |
| Sub ¶ | | | Sub ¶ | Note | | |
| Page | 113 | | Page | 113 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "The AMO must submit evidence of a need to maintain or alter U.S.-registered aircraft and parts. This evidence may be in the form of an Letter of Intent (LOI), work order, or contract with details of the relevant customer. A relevant customer may be a U.S.-based repair station; or a U.S. operator, distributor, or lessor." | Section | C | "The AMO must submit evidence of a need (perceived or continuing) to maintain or alter U.S.-registered aircraft and/or parts. This evidence may be in the form of a Letter of Intent (LOI), work order, or contract with details of the relevant customer. A relevant customer may be a U.S.-based repair station; or a U.S. operator, distributor, or lessor." | None. Although the supplement need not change, the language helps repair station with potential but not solid "need" to apply for and obtain an EASA approval. |
| Part | I | | Part | I | | |
| ¶ | ¶ | | ¶ | ¶ | | |
| Sub ¶ | Sub ¶ | | Sub ¶ | Sub ¶ | | |
| Page | 124 | | Page | 124 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "The applicant must submit to the AA the formal application package, which contains the following." | Section | C | "At least 60 days prior to the date initial approval is required, the applicant must submit to the AA the formal application package, which contains the following." | None. While the supplement may not change, this language should encourage applicants to make timely application for new or renewing certificates. |
| Part | I | | Part | I | | |
| ¶ | 7 | | ¶ | 7 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 125 | | Page | 125 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "The FAA ASI will complete block 10 of FAA Form 8310-3." | Section | C | "The FAA ASI will complete block 10 of FAA Form 8310-3. (Once block 10 action block is checked approved, this action approves the maintenance functions listed in block 4, unless block 6 is notated by the inspector/surveyor that the maintenance functions requested are not approvable.)" | None. While this makes no change to the supplement, it does clarify directions to the agency personnel. |
| Part | I | | Part | I | | |
| ¶ | 9 | | ¶ | 9 | | |
| Sub ¶ | 9.5.1 | | Sub ¶ | 9.5.1 | | |
| Page | 128 | | Page | 128 | | |

**Change 7 to the Maintenance Annex Guidance issued under the U.S.-EU Bilateral Aviation Safety Agreement**
Significant Changes and Related Impacts

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "To ensure prompt attention to certification and renewal correspondence, the AMO (in addition to copying the FAA) should use the following organizational e-mail address for the DFW-IFO: 9-AVS-DFW-IFO@faa.gov" | Section | C | "To ensure prompt attention to certification and renewal correspondence, the AMO (in addition to copying the FAA) should use the following organizational e-mail address: 9-AVSNYC-IFO@faa.gov. | None. While this does not change the EU-based repair station supplement, it helps the agencies administer the bilateral more comprehensively. |
| Part | I | | Part | I | | |
| ¶ | 9 | | ¶ | 9 | | |
| Sub ¶ | 9.5.2 Note | | Sub ¶ | 9.5.2 Note | | |
| Page | 129 | | Page | 129 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "Statement/Document of Continued Need." | Section | C | "Statement/Document of perceived or continued need." *Compare* C(II)(1)(1.4). | None. The statement of need can be based upon promised work, not just ongoing. |
| Part | II | | Part | II | | |
| ¶ | 1 | | ¶ | 1 | | |
| Sub ¶ | 1.1.2 | | Sub ¶ | 1.1.2 | | |
| Page | 130 | | Page | 130 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "To ensure prompt attention to certification and renewal correspondence, the AMO (in addition to a copying the FAA) should use the following organizational e-mail address for the DFW-IFO: 9AVS-DFW-IFO@faa.gov" | Section | C | "NOTE: To ensure prompt attention to certification and renewal correspondence, the AMO (in addition to a copying the FAA) should use the following organizational e-mail address: 9-AVS-NYCIFO@faa.gov." | None. While this does not change the EU-based repair station supplement, it helps the agencies administer the bilateral more comprehensively. |
| Part | II | | Part | II | | |
| ¶ | 3 | | ¶ | 3 | | |
| Sub ¶ | 3.4.2 Note | | Sub ¶ | 3.4.2 Note | | |
| Page | 134 | | Page | 133 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "The FAA will, on notification of a limitation imposed on an EASA Form 3, scope of approval, take the appropriate action with regard to amending FAA Operations Specifications." | Section | C | "The FAA will, on notification of a limitation imposed on an EASA Form 3, scope of approval, take the appropriate action with regard to amending the AMO's FAA Operations Specifications." | None. No change to the EU-based supplement is needed; provides direction to agency personnel. |
| Part | II | | Part | 2 | | |
| ¶ | 5 | | ¶ | 5 | | |
| Sub ¶ | 5.2.2 | | Sub ¶ | 5.2.2 | | |
| Page | 135 | | Page | 134 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "Each of the following situations requires the AMO to apply for a change in a repair station certificate using FAA Form 8310-3: * * * A request to add or amend a rating…." | Section | C | "Each of the following situations requires the AMO to apply for a change in a repair station certificate using FAA Form 8310-3: * * * A request to add or remove a rating…." | None. This merely clarifies when an application for a change in the repair station certificate from the FAA is needed. |
| Part | III | | Part | III | | |
| ¶ | 1 | | ¶ | 1 | | |
| Sub ¶ | 1.2 | | Sub ¶ | b | | |
| Page | 136 | | Page | 135 | | |

**Change 7 to the Maintenance Annex Guidance issued under the U.S.-EU Bilateral Aviation Safety Agreement**
Significant Changes and Related Impacts

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "A change in ownership or name change. If the holder of a repair station certificate sells or transfers its assets, the new owner must apply for an amended certificate. Name changes also require an application and certificate change . . ." | Section | C | "A change in ownership or name change (including d/b/a). If the holder of a repair station certificate sells or transfers its assets, the new owner must apply for a new or an amended certificate. Name changes also require an application and certificate change." | None. This merely clarifies that a name change triggers the requirement for a change in the FAA repair station certificate (since the operations specifications are part of the certificate). |
| Part | III | | Part | III | | |
| ¶ | 1 | | ¶ | 1 | | |
| Sub ¶ | 1.3 | | Sub ¶ | c | | |
| Page | 136 | | Page | 135 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "Addition or deletion of additional fixed locations and line stations." | Section | C | [Text omitted in Change 7] | None. |
| Part | III | | Part | III | | |
| ¶ | 1 | | ¶ | 1 | | |
| Sub ¶ | 1.4 | | Sub ¶ | | | |
| Page | 136 | | Page | 135 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | [New text added in Change 7] | Section | C | "Changes or amendments to the FAA approval shall be submitted to the FAA (e-mail to: 9-AVS-NYC-IFO@faa.gov) using the SAS Vitals information sheet in Section C, Appendix 4." | None. Merely reflects tasks to be performed by the authorities. |
| Part | III | | Part | III | | |
| ¶ | 1 | | ¶ | 1 | | |
| Sub ¶ | | | Sub ¶ | Note | | |
| Page | 136 | | Page | 135 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "Any FAA certificate action involving suspension or revocation will be carried out by the FAA Coordinator (IFO) with the certificate oversight responsibility in accordance with FAA regulations and procedures." | Section | C | "Any FAA certificate action involving suspension or revocation will be carried out by the FAA Coordinator (IFO) with certificate oversight responsibility in accordance with FAA regulations and procedures (i.e., the current editions of FAA Order 8900.1 and FAA Order 2150.3, FAA Compliance and Enforcement Program)." | None. Merely reflects the requirements of 14 CFR and the agency's responsibilities for taking certificate action. |
| Part | V | | Part | V | | |
| ¶ | 3 | | ¶ | 3 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 140 | | Page | 139 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "When a repair station surrenders its 14 CFR part 145 certificate to the AA, the AA should send that original certificate to the FAA Coordinator (IFO)." | Section | C | "When a repair station surrenders its 14 CFR part 145 certificate to the AA, the AA must inform the FAA by e-mail to: 9-AVS-NYC-IFO@faa.gov and archive the FAA certificate. The EASA FS1 shall notify the FAA Coordinator (IFO) of the surrender." | None. Merely reflects the agency's responsibilities when a repair station surrenders its certificate and the FAA accepts that surrender. |
| Part | V | | Part | V | | |
| ¶ | 5 | | ¶ | 5 | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | 140 | | Page | 139 | | |

**Change 7 to the Maintenance Annex Guidance issued under the U.S.-EU Bilateral Aviation Safety Agreement**
Significant Changes and Related Impacts

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "Acceptability of Component." | Section | C | "Acceptability of Components/Parts." | None. Merely changes the title of the section. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 7 | | ¶ | 7 | | |
| Sub ¶ | c | | Sub ¶ | c | | |
| Page | 152 | | Page | 151 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "ii) For new components released by an EU-PAH, release must be on an EASA Form 1 as a new part.<br>iii) For new components released by a Canadian PAH, release must be on the Transport Canada Civil Aviation (TCCA) Canadian Form One as a new part." | Section | C | "The new parts manufactured outside of the territories of the United States are subject to the provisions of a Bilateral Agreement with the United States addressing the performance of design, production approval, and airworthiness for the acceptance of that part." | None. Reflects the removal of "triple releases" from the EU-based approved maintenance organizations "supplement." |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | c | | ¶ | (1)(a)(i) | | |
| Sub ¶ | (1)(a) | | Sub ¶ | | | |
| Page | 152 | | Page | 151 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | [New text added in Change 7] | Section | C | "NOTE: Evidence of direct shipment authorizations extended to approved suppliers is required. If a replacement part is shipped under direct ship authorization, the Authorized Release Certificate must indicate that the Production Approval Holder (PAH) has authorized direct shipment. This indication may be a supplemental "remark" entry on the Authorized Release Certificate indicating the authorization to the supplier for direct shipment of replacement parts from the supplier's location." | None. Merely reflects the requirements for direct ship relating to the U.S. PAH. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 7 | | ¶ | 7 | | |
| Sub ¶ | (c)(1)(a) | | Sub ¶ | (c)(1)(a)(v) Note | | |
| Page | 152 | | Page | 151 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "New parts that were received into inventory prior to October 1, 2016, at a minimum, have a document or statement (containing the same technical information as an FAA Form 8130-3) issued by the PAH or supplier with direct ship authority. Parts currently in inventory, documented with | Section | C | "NOTE: New parts that were received into inventory prior to October 1, 2016, must, at a minimum, have a document or statement (containing the same technical information as an FAA Form 8130-3) issued through an approved design, the PAH, or supplier with direct ship authority. These parts in inventory, | None. Merely reflects that fact that not all parts will be received with the proper documentation from outside the EU's control. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 7 | | ¶ | 7 | | |
| Sub ¶ | (c)(1)(a)(i) Note | | Sub ¶ | (c)(1)(a)(v) Note | | |
| Page | 152 | | Page | 151 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | the required information, will be grandfathered and remain suitable for installation, provided the certification/release date on these parts is prior to October 1, 2016." | | | documented with the required information, will be grandfathered and remain suitable for installation into U.S. articles, provided the certification/release date of these parts is prior to October 1, 2016." | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | C | "Used components must be traceable to FAA- and/or EASA-certificated facilities that are approved and authorized to certify the maintenance, preventive maintenance, and/or alterations which they have performed. In the case of life limited parts, the life used must be documented. The used component must be in a satisfactory condition for installation and be eligible for installation as stated in the PAH parts catalogue or aviation authority (AA) approval document. An authorized release document, as provided below, must accompany the used component." | Section | C | "Used components/parts consumed in maintenance must be traceable to approved FAA-certificated persons authorized under 14 CFR part 43, section 43.7. The signature, certificate number, and type of certificate held by the person approving the work must be documented. The part must be in an airworthy condition and eligible for installation. An authorized release document, as provided below, may be acceptable to accompany the part." | None. The language reflects the different requirements for maintenance providers and installers and points to the appropriate regulations for determinations of authority. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 7 | | ¶ | 7 | | |
| Sub ¶ | (c)(2)(a) | | Sub ¶ | (c)(2)(a) | | |
| Page | 153 | | Page | 152 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | C | "An authorized release document, as provided below, must accompany the used component."<br>" i) An EASA Form 1 issued as a dual maintenance release must accompany used components from EU-based 14 CFR part 145 repair stations.<br>" ii) Used components from a EASA-approved part 145 AMO not FAA-approved must not be used even if accompanied by an EASA Form 1<br>" iii) An FAA Form 8130-3 (14 CFR § 43.9 release) issued as a maintenance release must accompany used components from a 14 CFR part 145 Repair Station.<br>" iv) Used components provided by a U.S. air carrier shall have documentation in accordance with the | Section | C | "An authorized release document, as provided below, may be acceptable to accompany the part.<br>" i) FAA Form 8130-3 issued as a maintenance release that accompanies a part from a 14 CFR part 145 repair station.<br>" ii) An EASA Form 1 issued as a dual maintenance release that accompanies a part from an EU-based 14 CFR part 145 AMO.<br>" iii) Used components from an EASA-approved part 145 AMO not FAA-approved must not be used even if accompanied by an EASA Form 1.<br>" iv) A 14 CFR part 43, section 43.9, maintenance record entry that accompanies a product or part from a person authorized under 14 CFR part | None. Reflects the removal of the "triple" release from EU-supplement language. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 7 | | ¶ | 7 | | |
| Sub ¶ | (c)(2)(a)(i) thru (vi) | | Sub ¶ | (c)(2)(a)(i) thru (v) | | |
| Page | 153 | | Page | 152 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | U.S. air carrier's CAMP.<br>" v) A Canadian Form One issued as a maintenance release should accompany used components from a Canadian-based AMO.<br>" vi) Used components that have been issued a triple release (i.e., certifying compliance with FAA, EASA, TCCA requirements) on an EASA Form 1 as a maintenance release are acceptable." | | | 43, section 43.7.<br>" v) Used components provided by a U.S. air carrier shall have documentation in accordance with the U.S. air carrier's CAMP." | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | C | "* For the purpose of the table above, triple release mentioned in subparagraph vi above has the same status as EASA Form 1 Dual." | Section | C | [Text omitted in Change 7] | None. Reflects the removal of the "triple" release from EU-supplement language. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 7 | | ¶ | 7 | | |
| Sub ¶ | d | | Sub ¶ | d | | |
| Page | 154 | | Page | 153 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | C | [New text added in Change 7] | Section | C | "Release statements for cases where compliance with both regulatory systems cannot be met (i.e., parts installed with single release, ADs not being complied with)." | Reflects situations where the article was only approved under of the bilateral partner's systems—in this case by the FAA only. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 7 | | ¶ | 7 | | |
| Sub ¶ | | | Sub ¶ | e | | |
| Page | 155 | | Page | 154 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | C | [New text added in Change 7] | Section | C | "Release Procedure for Components That Are Used Only in an FAA-approved Design (TC/STC)…." | Reflects situations where the article was only approved under of the bilateral partner's systems—in this case by the FAA only. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 7 | | ¶ | 7 | | |
| Sub ¶ | | | Sub ¶ | f | | |
| Page | 155 | | Page | 155-156 | | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | C | "If the AMO is required to perform maintenance on a U.S.-registered aircraft or article located within the territory of the United States and operated under 14 CFR parts 121,135 or 125, the AMO must meet the procedures described in Section C, Appendix 1, paragraph 9(d)." | Section | C | "If the AMO is required to perform maintenance on a U.S.-registered aircraft or article located within the territory of the United States and operated under 14 CFR parts 121,135, 125, or 91, the AMO must meet the procedures described in Section C, Appendix 1, paragraph 9(d)" | Reflects the requirements for EU-based repair stations working away from the fixed location in the United States. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 9 | | ¶ | 9 | | |
| Sub ¶ | (c)(2) | | Sub ¶ | (c)(2) | | |
| Page | 157 | | Page | 158 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "If the AMO has approved procedures in the FAA Supplement, it may be authorized to perform work away from station. The FAA will issue operations specification D100. **Explanation**: An AMO may perform work away from its fixed location on a recurring basis when necessary, such as to perform mobile field services. This will allow work away from the AMO's fixed location as a part of everyday business rather than under special circumstances only. Once the AA accepts the work away from station procedures in the FAA supplement to the MOE the FAA can issue FAA OpSpecs for work away from station. After OpSpecs paragraph D100 is issued there is no requirement for notifying the FAA in advance. Subsection D describes the supplement requirements." (Emphasis in original.) | Section | C | "If the AMO has approved procedures in the FAA Supplement, it may be authorized to perform work away from station on a recurring basis. The FAA will issue operations specification D100. **Explanation**: An AMO may perform work away from its fixed location on a recurring basis, such as to perform mobile field services. This will allow work away from the AMO's fixed location as a part of everyday business rather than under special circumstances only. Once the AA accepts the work away from station procedures in the FAA supplement to the MOE, the FAA can issue FAA OpSpecs for work away from station. After OpSpecs paragraph D100 is issued there is no requirement for notifying the FAA in advance. Subsection D describes the supplement requirements." (Emphasis in original.) | Reflects the different requirements for working away from the fixed location on a recurring basis versus "one-time" or "as-needed" basis. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 9 | | ¶ | 9 | | |
| Sub ¶ | (c)(4) | | Sub ¶ | (c)(4) | | |
| Page | 158 | | Page | 158 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "State the organization's responsibility to maintain a record of work performed away from the AMO, both within the country and outside the country. Any record of this work should include…." | Section | C | "State the organization's responsibility to maintain a record of work performed away from the AMO, both within the country and outside the country. Any record of this work should be in English and include…." | States the requirement for maintenance records when working away from the fixed location by an EU-based AMO. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 9 | | ¶ | 9 | | |
| Sub ¶ | (d)(8) | | Sub ¶ | (d)(8) | | |
| Page | 159 | | Page | 159 | | |

| MAG 6 | | | MAG 7 | | | Impact on EASA Supplement* |
|---|---|---|---|---|---|---|
| Section | C | "An FAA-certificated part 145 repair station may contract a maintenance function pertaining to an article to an outside source. (Contracting is some times referred to as subcontracting. For the purposes of this section, the term contracting includes subcontracting). There are two elements to the contracting provisions of the MAG." | Section | C | To be considered a contract maintenance function that requires FAA approval, the repair station must meet both of the following conditions: (1) entering into an agreement with another person or entity (FAA-certificated or noncertificated) to perform maintenance functions on an article; and (2) the repair station chooses to | Repeats the convoluted reasoning behind contracting maintenance functions to certificated versus non-certificated sources for EU-based AMOs. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 10 | | ¶ | 10 | | |
| Sub ¶ | 159 | | Sub ¶ | 160 | | |
| Page | 160 | | Page | 160 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| | | | | | exercise the privileges of its certificate and assumes responsibility for the work performed by the contracted person or entity. An FAA-certificated part 145 repair station may contract an approved maintenance function pertaining to an article to an outside source. (Contracting is sometimes referred to as subcontracting. For the purposes of this section, the term contracting includes subcontracting). There are two elements to the contracting provisions of the MAG." | |
| | | | | | | |
| **MAG 6** | | | **MAG 7** | | | **Impact on EASA Supplement*** |
| Section | C | "Explain that if the AMO contract functions to another organization that is FAA-certificated, the contractor is responsible for approving the return to service for each item on which it has worked." | Section | C | "Explain that if the AMO contracts a maintenance function to another organization that is FAA-certificated, the contracted facility performing the maintenance function is responsible for the maintenance function work performed in accordance with 14 CFR part 43 for each item on which it has worked." | Repeats the convoluted reasoning behind contracting maintenance functions to certificated versus non-certificated sources for EU-based AMOs. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 10 | | ¶ | 10 | | |
| Sub ¶ | (b)(3)(i) | | Sub ¶ | (b)(3)(i) | | |
| Page | 160 | | Page | 161 | | |
| | | | | | | |
| Section | C | "A critical component is defined as a part identified as critical by the design approval holder during the validation process, or otherwise by the exporting authority. Typically, such components include parts for which a replacement time, inspection interval, or related procedure is specified in the Airworthiness Limitations Section or certification maintenance requirements of the manufacturer's maintenance manual or instructions for continued airworthiness." | Section | C | Text omitted in Change 7] | Removes the "critical component" language and directs EU-based AMOs to the Technical Implementation Procedures (TIP) for the acceptance or approval of design data. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 11 | | ¶ | 11 | | |
| Sub ¶ | (a) Note | | Sub ¶ | (a) | | |
| Page | 161 | | Page | 162 | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| Section | C | "Procedures the organization will use to determine when FAA-approved data is required (procedures for determining what is a major repair or a major alteration as detailed in 14 CFR part 43 Appendix A)." | Section | C | "Procedures the organization will use to determine when FAA-approved data is required (procedures for determining what is a major repair or a major alteration under both the definition in 14 CFR part 1 and as detailed in 14 CFR part 43, Appendix A)." | Correctly includes the definition of the terms in section 1.1 of 14 CFR for EU-based AMOS. |
| Part | Appx 1 | | Part | Appx 1 | | |
| ¶ | 11 | | ¶ | 11 | | |
| Sub ¶ | (c)(i) | | Sub ¶ | (c)(i) | | |
| Page | 162 | | Page | 162 | | |
| | | | | | | |
| Section | C | "COMPLIANCE WITH U.S. 14 CFR PART 121 AIR CARRIER CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM (CAMP) OR 14 CFR PART 125 OPERATOR INSPECTION PROGRAM" | Section | C | COMPLIANCE WITH U.S. 14 CFR PART 121 AIR CARRIER CONTINUOUS AIRWORTHINESS MAINTENANCE PROGRAM (CAMP), 14 CFR PART 135 (10 OR MORE WITH A CAMP), OR 14 CFR PART 125 OPERATOR INSPECTION PROGRAM | Correctly includes part 135 operators in the CAMP requirements for EU-based AMOs. |
| Part | Appx 1 | | Part | Appx 1 | | |
| Paragraph | 12 | | Paragraph | 12 | | |
| Subparagraph | | | Subparagraph | | | |
| Page | 162 | | Page | 163 | | |
| | | | | | | |
| Section | D | [New text added in Change 7] | Section | D | "The FAA and the EASA agree to the provisions of this Maintenance Annex Guidance as indicated by the signature of their duly authorized representatives. This Maintenance Annex Guidance enters into force 90 days after the date of last signature." | Changed the signature status for the agencies (and confused everyone on the compliance date). |
| Part | | | Part | | | |
| ¶ | | | ¶ | | | |
| Sub ¶ | | | Sub ¶ | | | |
| Page | | | Page | 170-171 | | |