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## The Aeronautical Repair Station Association's Model EASA Supplement to the Repair Station and Quality Manual

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On Nov. 18, 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 provides a summary of the Change 7 impact on Revision 3 of ARSA's Repair Station and Quality Manual (RSQM) European Union Aviation Safety Agency (EASA) Supplement. Persons already using the supplement can use this document to determine what updates are required. Those seeking to make a first-time purchase of the supplement should [contact ARSA](#).

The summary is organized by the impacted supplement sections:

### **1.2. Renewal Process**

The two-year renewal package must also include a copy of the relevant page of the supplement containing the list of line stations exercising the privileges of the EASA Part-145 approval together with associated operator, aircraft type, location, and contract specifying the scope of work for that particular operator. *See MAG Section B, Appendix 1, Paragraph 18.e.*

For repair stations that do not perform line maintenance, the procedures for renewal will not change nor will the supplement.

Most repair stations with line maintenance currently have the listed information in the EASA supplement.

### **1.6. Human Factors**

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. *See MAG Section B, Appendix 1, Paragraph 17.j.*

For repair stations that use their product and process audits to identify human factors elements, the additional connection between the audit and the human factors training will be a relatively easy update.

For repair stations that are still new to the product and process audit procedures, ARSA will be updating the forms and results to ensure human factor elements are noted for training purposes.

Though the MAG does not specify a timeframe for accomplishment of recurrent training, ARSA encourages members to build human factors into annual training requirements – particularly in light of the new language requiring use of “lessons learned.”

### **2.1.2. Contract Maintenance Functions**

For purposes of work performed under the MAG, a non-EASA-approved source shall be treated as a non-certificated contractor regardless of what other certifications/approvals are held by the contracted entity. If the other organization 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. See *MAG Section B, Appendix 1, Paragraph 16.b.*

This is not a new requirement for U.S.-based repair stations; non-EASA approval holders need to be treated as non-certificated for purposes of a dual release.

### **2.1.5. Line Stations**

Contracts with line stations that will exercise the privileges of the EASA Part-145 approval shall 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. See *MAG Section B, Appendix 1, Paragraph 18.e.*

This should not be a new requirement for U.S.-based repair stations; the FAA regulations require the repair station to follow the air carrier’s program, including training requirement for required inspection item (RII) inspectors and individuals authorized to approve the article, including completed aircraft, for return to service.

### **2.3.1. Components Eligible for Installation**

The list of appropriate documentation for used components now includes a reference to acceptable components based on provisions of other bilateral agreements. EASA provided a summary list of individual agreements that can be found at: [https://www.easa.europa.eu/sites/default/files/dfu/Parts%20Table%20EASA%20MMT%20Final\\_FS1.1%2B1.4.pdf](https://www.easa.europa.eu/sites/default/files/dfu/Parts%20Table%20EASA%20MMT%20Final_FS1.1%2B1.4.pdf). See *MAG Section B, Appendix 1, Paragraph 10.k.2.a.*

References to “critical component” have been removed from Section B of the MAG. This removal includes the elimination of previous requirements for repair data related to such components to be submitted to the agency

New text has been added at Section B, Appendix 1, paragraph 10(n)(4) outlining the “Release Procedure for Components That Are Used Only in an EASA-approved Design (TC/STC).”

The provision does not impact release of work related to products or articles with a U.S. design approval, for example those that are already on the repair station’s capability list. The addition only impacts designs that have been approved by EASA but not by the FAA, for example, the [Sukhoi](#) aircraft or an EU-registered aircraft with a unique STC for configurations not approved in the US.

A written request routed through the repair station’s ASI 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. *See MAG Section B, Appendix 1, Paragraph 10.n.*

For repair stations working on completed aircraft, aircraft engines or propellers, which may have an EASA-only TC or STC, this change will require an addition to the supplement on how the permission will be obtained before the work is approved for return to service. The expectation is that the work will be performed using DAH/PAH maintenance information or other approved data from EASA.

References to “triple” release FAA Form 8130-3 have been removed from the MAG.

There is no need to include the information in a bilateral and each bilateral acknowledges the bilateral of the other two countries for approval for return to service (maintenance release) purposes.

### **2.3.6. Reports of Serious Failures, Malfunctions or Defects**

The list of entities to which serious defects must be reported within 72 hours now includes “the authority of the state of registry.” *See MAG Section B, Appendix 1, Paragraph 13.*

The requirement to report serious defects to EASA on EU-registered aircraft is not new; it should be in the repair station’s current supplement.

### **2.4.2. Product Audits**

Organizations intending to contract out their audit functions should contact EASA at [foreign145@easa.europa.eu](mailto:foreign145@easa.europa.eu) for further guidance concerning qualification and training requirements. *See MAG Section B, Appendix 1, Paragraph 14.e.1.*

The qualifications and training requirements for third-party or outside auditors is pretty well established under the EASA regime. For repair stations that are not conducting their

own audits, this may require a change to the supplement. The ARSA model supplement assumes that the repair station will be conducting its own audits. As mentioned above, the supplement will be enhanced to address the human factor elements during the audit process to enable “real life” additions to the recurrent training requirements.