


Irish Aviation Authority The Times Building 11–12 D'Olier Street Dublin 2, Ireland www.iaa.ie	Údarás Eitlíochta na hÉireann Foirgneamh na hAmanna 11–12 Sráid D'Olier Baile Átha Cliath 2, Éire	AAM No. 05 Revision: 01 Date: 14.08.19	
Safety Regulation Division	Rannán na Rialachán Sábháilteachta		

Title: ARC Renewals and Maintenance of Aircraft Required to Hold an EASA Certificate of Airworthiness (not involved in Commercial Air Transport)

Advisory Memoranda are provided for information purposes only and must not be misconstrued as formally adopted Acceptable Means of Compliance (AMC) or as Guidance Material (GM).

1. INTRODUCTION

This memo sets out, in general terms, the maintenance requirements and ARC renewal options available to General Aviation aircraft under EASA regulations. In this leaflet, General Aviation, means small aircraft (less than 5,700kg) not used for Commercial Operations or Commercial Air Transport. Aircraft listed in Annex I of the Basic Regulation are excluded from these requirements and national regulations apply instead. Implementing rule (EU) 1321/2014 contains detailed rules on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks.

2. REFERENCES

(EU) 1321/2014 (as amended)

(EU) 2018/1139 (as amended)

This Advisory Memorandum supersedes and replaces Airworthiness Advisory Memorandum 03-11

3. DEFINITIONS

a. Airworthiness Review Certificate (ARC)

Aircraft subject to EASA regulations are issued with non-expiring Certificates of Airworthiness. These are validated by an Airworthiness Review Certificate (ARC), issued by a CAMO, a maintenance organisation, or by the IAA. The ARC is valid for one year and may be extended twice for a one-year period, before it must be reissued. An aircraft may not fly with an invalid ARC.

b. CAMO


Continuing Airworthiness Management Organisation (CAMO) is an organisation approved under Part M Subpart G, which may manage the continuing airworthiness of an aircraft. This organisation may extend the ARC of an aircraft under their management. A CAMO that also holds Subpart I privileges may also issue an ARC or an ARC recommendation.

c. Maintenance Organisation

A maintenance organisation approved under Part 145 or Part M Subpart F may also be approved to perform airworthiness reviews for ELA1 aircraft not involved in commercial operations.

d. Certifying Staff approved under Part M M.A.901(g)

Persons approved by the authority to complete an Airworthiness Review on ELA1 aircraft not involved in commercial operations, and issue a recommendation to the IAA for the issuance of an ARC in respect of that aircraft. They must hold the appropriate type or group rating on their

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EASA Part 66 licence, or equivalent, and have at least three years' experience in continuing airworthiness. They must meet the requirements of Certifying Staff, for the subject aircraft, at the time of the Airworthiness Review.

e. CAT

Commercial Air Transport

f. Complex Motor Powered Aircraft

(i) an aeroplane:

- with a maximum certificated take-off mass exceeding 5,700 kg, or
- certificated for a maximum passenger seating configuration of more than nineteen, or
- certificated for operation with a minimum crew of at least two pilots, or
- equipped with (a) turbojet engine(s) or more than one turboprop engine, or

(ii) a helicopter certificated:

- for a maximum take-off mass exceeding 3,175 kg, or
- for a maximum passenger seating configuration of more than nine, or
- for operation with a minimum crew of at least two pilots, or

(iii) a tilt rotor aircraft

g. Commercial Operation

Any operation of an aircraft, in return for remuneration or other valuable consideration, which is available to the public, or when not made available to the public, which is performed under a contract between operator and a customer, where the latter has no control over the operator.

h. Controlled Environment


When an aircraft has remained under the management of the same CAMO for the previous 12 months and has been maintained in accordance with Part M during that time, it is deemed to be in a controlled environment.

i. ELA1 – European Light Aircraft

- An aeroplane, sailplane or powered sailplane with a Maximum Take-off Mass (MTOM) less than 1,200kg that is not classified as complex motor-powered aircraft;
- A balloon with a maximum design lifting gas or hot air volume of not more than 3,400m³ for hot air balloons, 1,050m³ for gas balloons, 300m³ for tethered gas balloons;
- An airship designed for not more than four occupants and a maximum design lifting gas or hot air volume of not more than 3,400m³ for hot air airships and 1,000m³ for gas airships.

j. MTOM

Maximum Take Off Mass.

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4. Maintaining General Aviation Aircraft

a. Maintenance Programme

The maintenance of each aircraft shall be organised in accordance with an Aircraft Maintenance Programme (AMP). The AMP should be developed in accordance with the criteria laid down in Part M M.A.302.

EASA has published a template which can be used for other-than-complex motor-powered aircraft. This document is available on the IAA website. Additional information is available in AAM10, at latest issue.

b. Who is responsible for ensuring that the aircraft is maintained in accordance with the AMP?

The owner is responsible for ensuring that;

- The aircraft is maintained in an airworthy condition;
- Any operational and emergency equipment fitted is correctly installed and serviceable;
- The Airworthiness Review Certificate remains valid;
- The maintenance of the aircraft is performed in accordance with the aircraft maintenance programme (AMP).

The owner may contract the tasks associated with the continuing airworthiness to a CAMO. In this case, the CAMO assumes responsibility for the proper accomplishment of the contracted tasks.


c. Who can issue a Certificate of Release to Service (CRS) following maintenance?

This memo is only applicable to other-than-complex motor-powered aircraft and aircraft not involved in Commercial Operations or Commercial Air Transport.

For these aircraft, a CRS may be issued by an appropriately rated Part 145 Maintenance Organisation, Part M Subpart F Maintenance Organisation or a Part 66 Licence holder, or equivalent, when the aircraft's MTOM is less than 2,730kg. Some maintenance, when detailed in the maintenance programme, may be released by the pilot-owner.

A Part M Subpart F approved organisation may install components with EASA or FAA certification, in accordance with their organisation's approved procedures, on certain aircraft.

The overhaul of engines and propellers for CS-VLA (Very Light Aeroplanes), CS-22 ((powered) Sailplanes) and LSA (Light Sports Aircraft) aircraft may be performed by Part 66 Licence holders. The maintenance performed, in these cases, is not eligible for the issuance of an EASA Form 1.

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d. What is limited Pilot-Owner maintenance?

A list of maintenance tasks which a pilot-owner may issue a CRS for is available in Appendix VIII to (EU) 1321/2014. The permitted pilot-owner tasks and the pilot-owner who may perform them, must be identified in the AMP. This privilege only applies to aircraft with an MTOM of less than 2,730kg.

5. Airworthiness Review Certificate

An aircraft may not fly unless it has a valid Airworthiness Review Certificate (ARC). This Certificate is issued after a successful Airworthiness Review and has a validity of one year. The review entails a full review of the aircraft records and a physical survey of the aircraft. It may be carried out by an appropriately rated CAMO (with Subpart I privileges), maintenance organisation (with Subpart I privileges), an approved Part 66 Licence holder (for ELA1 aircraft not involved in commercial operations), or the IAA.

Aircraft deemed to be in a controlled environment can have their ARCs extended twice, without further review, for a period of one year each time, by the CAMO.

All ARCs must be registered with the IAA arc@iaa.ie within 10 days of issuance and the appropriate fee paid.


An Airworthiness Review may be anticipated by up to 90 days, without loss of continuity of the ARC, to allow for the physical inspection to be carried out during a maintenance check. This means that the new expiry date will be one year after the previous ARC expiration date.

When an aircraft is imported from outside the EU the initial ARC must be issued by the IAA.

The process for issuing and extending ARCs can be seen in Figure 1.

a. Who can perform the Airworthiness Review

Aircraft Type (General Aviation only)	Approved Certifying Staff	CAMO	Maint. Organisation	IAA
ELA1 (e.g. balloons and aeroplanes under 1,200kg MTOM)	YES* **	YES	Yes **	YES
Aircraft below 2,730kg MTOM (which are not ELA1 or Complex)	NO	YES	NO	YES
Aircraft above 2,730kg and below 5,700kg	NO	YES <small>(issue ARC in a controlled environment, or ARC recommendation)</small>	NO	YES <small>(see Note)</small>

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* This method can only be used for two consecutive years; thereafter the review must be done by a CAMO or the IAA.

** This listing is not applicable to aircraft in Commercial Air Transport or Commercial Operations.

NOTE: Whenever circumstances reveal the existence of a potential safety threat, the competent authority shall carry out the airworthiness review and issue the ARC itself.

ARC Fees Payable to the IAA

Aircraft below 5,700kg MTOM

	Fees per the Fees Order*
Importing an aircraft (first ARC)	
ARC extended by a CAMO	€100
ARC issued by a CAMO/Maintenance Organisation	€100
ARC recommendation by Part 66 holder	€100

*When the IAA issues the ARC, the existing Certificate of Airworthiness fees apply, as described in schedule 2 of the Irish Aviation Authority (Fees) Order S.I. 523 of 2015.

This Memorandum is available for download from the Irish Aviation Authority website: www.iaa.ie. Any queries relating to this Memo should be addressed to the Manager Air Operation & General Aviation, Airworthiness Standards Department, The Times Building, 11-12 D'Olier Street, Dublin 2.