


<b>Irish Aviation Authority</b> The Times Building 11–12 D'Olier Street Dublin 2, Ireland <a href="http://www.iaa.ie">www.iaa.ie</a>	<b>Údarás Eitlíochta na hÉireann</b> Foirgneamh na hAmanna 11–12 Sráid D'Olier Baile Átha Cliath 2, Éire	AAM No. 05 Revision: 03 Date: 08.04.2020	
<b>Safety Regulation Division</b>	<b>Rannán na Rialachán Sábháilteachta</b>		

## **Title: ARC Renewals and Maintenance of EASA aircraft subject to Part ML**

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 Part ML regulations. EASA Part ML applies to other than complex motor-powered aircraft not listed in the air operator certificate of an air carrier licensed in accordance with Regulation (EC) No 1008/2008 from 24<sup>th</sup> March 2020;

- Aeroplanes of 2,730kg Maximum Take-off Mass (MTOM) or less;
- Rotorcraft of 1,200kg or less, certified for a maximum of up to 4 occupants;
- Other ELA2 aircraft.

Implementing rule (EU) 1321/2014, as amended, 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.

Aircraft listed in Annex I of the Basic Regulation are excluded from these requirements and national regulations apply instead.

### **2. REFERENCES**

(EU) 1321/2014 (as amended)

(EU) 2018/1139 (as amended)

This Advisory Memorandum supersedes and replaces Airworthiness Advisory Memorandum No. 05 Rev 02.

### **3. DEFINITIONS**

#### **a. Airworthiness Review Certificate (ARC) (EASA Form 15c)**


Aircraft subject to EASA Part ML are issued with non-expiring Certificates of Airworthiness. These are validated by an Airworthiness Review Certificate (ARC) (EASA Form 15c). An aircraft may not fly with an invalid ARC.

#### **b. Authorised Independent Airworthiness Review Staff**

An Independent Certifying Staff performing the 100-h/annual inspection contained in the AMP authorised to issue an ARC.

#### **c. CAMO/CAO**

A Continuing Airworthiness Management Organisation (CAMO) or Combined Airworthiness Organisation (CAO) is an organisation approved under Part CAMO or Part M Subpart G, or Part CAO respectively, which may manage the continuing airworthiness of an aircraft. This organisation may extend the ARC of an aircraft under their management. A CAMO/CAO that is so duly approved may issue an ARC.

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#### **d. Maintenance Organisation**

A maintenance organisation approved under Part 145, Part M Subpart F, or Part CAO performing the 100-h/annual inspection contained in the AMP may also be approved to issue ARCs.

#### **e. Independent Certifying Staff**

Independent Certifying Staff must hold:

- (i) a licence issued in accordance with Annex III (Part-66) rated for the corresponding aircraft or, if Annex III (Part-66) is not applicable to the particular aircraft, a national certifying-staff qualification valid for that aircraft.

#### **f. CAT**

Commercial Air Transport

#### **g. 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

#### **h. Controlled Environment**

When an aircraft has remained under the management of the same CAMO/CAO for the previous 12 months or since the last ARC was issued, whichever is longer, and has been maintained in accordance with Part M or Part ML, as applicable, during that time, it is deemed to be in a controlled environment.

#### **i. 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 ML.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 AAM No 10, 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/CAO. 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 aircraft regulated under EASA Part ML. For these aircraft, a CRS may be issued by an appropriately rated Part 145 Maintenance Organisation, Part M Subpart F organisation, Part CAO Maintenance Organisation, a Part 66 Licence holder, or the holder of a national certifying-staff qualification valid for that aircraft. Some maintenance, when detailed in the Aircraft Maintenance Programme, may be released by the pilot-owner.

A Part CAO/Part M Subpart F maintenance 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 or national certifying-staff qualification 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 II to Part ML. The pilot-owner(s) who may perform and certify these tasks must be identified in the AMP.

**5. Airworthiness Review Certificate (ARC) (EASA Form 15c)**


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. The airworthiness review and the issuance of the ARC shall be performed in accordance with point ML.A.903 by;

- 1) The competent authority;
- 2) An appropriately approved CAMO or CAO;
- 3) The approved maintenance organisation while performing the 100-h/annual inspection contained in the AMP
- 4) for aircraft operated under Annex VII (Part-NCO) to Regulation(EU) No 965/2012 or, in the case of balloons, not operated under Subpart-ADD of Annex II (Part-BOP) to Regulation (EU) 2018/395 or, in the case of sailplanes, not following Subpart DEC of Annex II (Part-SAO) to Regulation (EU) 2018/1976, the Authorised Independent Airworthiness Review Staff while performing the 100-h/annual inspection contained in the AMP, when holding:
  - (i) a licence issued in accordance with Annex III (Part-66) rated for the corresponding aircraft or, if Annex III (Part-66) is not applicable to the particular aircraft, a national certifying-staff qualification valid for that aircraft;
  - (ii) an authorisation issued by, alternatively:
    - (A) the competent authority who issued the licence issued in accordance with Annex III (Part-66),
    - (B) if Annex III (Part-66) is not applicable, the competent authority responsible for the national certifying- staff qualification.

ARCs issued by Authorised Independent Airworthiness Review Staff holding a national qualification shall not benefit from mutual recognition when transferring the aircraft to another Member State

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/CAO.

All ARCs must be registered with the IAA [arc@iaa.ie](mailto:arc@iaa.ie) within 10 days of issuance and the appropriate fee paid.

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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.

#### **ARC Fees Payable to the IAA**

#### **Aircraft below 2,730kg MTOM**

ARC extended by a CAMO/CAO	€100
ARC issued by a CAMO/CAO/Maintenance Organisation	€100
ARC issued by Authorised Independent Airworthiness Review Staff	€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](http://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.