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## **Title: Aircraft Maintenance Programmes for aircraft subject to EASA 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. Part ML regulations**

This AAM provides information to owners of aircraft which are subject to EASA Part ML regulations. These are aircraft, as defined below, and not listed in the Air Operator Certificate (AOC) of an air carrier licensed in accordance with Regulation (EC) No 1008/2008

- (1) Aeroplanes of 2,730kg maximum take-off mass (MTOM) or less;
- (2) Rotorcraft of 1,200kg MTOM or less, certified for a maximum of up to 4 occupants;
- (3) Other ELA2 aircraft e.g. sailplanes/balloons.

The Irish Aviation Authority may not approve Aircraft Maintenance Programmes (AMP) for aircraft subject to Part ML.

The AMP and any subsequent amendments thereto shall be, alternatively:

- (1) declared by the owner in accordance with point (c)(7) of point ML.A.302, where the continuing airworthiness of the aircraft is not managed by a CAMO or CAO;
- (2) approved by the CAMO or CAO responsible for managing the continuing airworthiness of the aircraft.

### **2. References**

This Advisory Memorandum supersedes and replaces Airworthiness Advisory Memorandum No. 10 Revision 02.

### **3. Definition**

“CAO” Combined Airworthiness Organisation

“CAMO” Continuing Airworthiness Management Organisation

“Declarant of a declaration of design compliance” refers to the natural or legal person who has submitted a declaration of design compliance in accordance with Part 21 Light.

“Design Approval Holder” (DAH) is the organisation with responsibility for the Type Design of the aircraft/engine/propeller/component or modification. Examples are Cessna, Lycoming, Slick and Petersen.

“Maintenance Programme” is intended to include scheduled maintenance tasks the associated procedures and standard maintenance practices.

### **4. Development of the Aircraft Maintenance Programme iaw EASA Part ML.A.302**

The aircraft continuing airworthiness and serviceability of both operational and emergency equipment is ensured by compliance with an AMP. An aircraft may only be maintained to a single AMP at a given point in time. That AMP details all scheduled maintenance tasks to be performed on the aircraft.

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When the aircraft is not managed by a CAMO or CAO, owners can now choose to develop an AMP for their aircraft. This is called an owner-declared maintenance programme (ODMP). Alternatively, when managed by a CAMO or CAO, the organisation managing the aircraft may develop the AMP.

The AMP may be based on EASA's published Minimum Inspection Programme (MIP) or the data issued by the DAH or the declarant of a declaration of design compliance. The AMP must not be less restrictive than the MIP.

### **Mandatory Maintenance Tasks**

The AMP must include all mandatory continuing airworthiness requirements, such as repetitive Airworthiness Directives, the Airworthiness Limitation Section (ALS) of the Instructions for Continued Airworthiness (ICA) sometimes called "Airworthiness Limitation Items" (ALI), or specific maintenance requirements contained in the Type Certificate Data Sheet (TCDS).

### **Additional Instructions for Continued Airworthiness to be taken into consideration**

The AMP must identify any additional tasks or Instructions for Continued Airworthiness to be performed because of the specific aircraft type, aircraft configuration and type and specificity of operation. The following elements must be considered, as a minimum:

- Specific installed equipment and modifications of the aircraft.
- Repairs incorporated in the aircraft.
- Life Limited components and flight safety critical components.
- Maintenance recommendations, such as Time Between Overhaul (TBO) intervals, recommended through service bulletins, service letters, and other non-mandatory service information.
- Applicable operational directives/requirements related to the periodic inspection of certain equipment.
- Special operational approvals.
- Use of the aircraft and operational environment.
- Pilot-owner maintenance (if applicable).

The owner/CAMO/CAO may choose to deviate from tasks or intervals contained in additional Instructions for Continued Airworthiness. Examples include Cessna SIDs and Robinson R44 12 Year Inspection per M.M. para 2.600. The details of any deviation or omission must be included in the AMP. The AMP may include alternative tasks to be performed instead of non-mandatory tasks or omit a task completely.

In an Owner-Declared Maintenance Programme, the owner is fully responsible for any deviations from Instructions for Continuing Airworthiness issued by the DAH or the declarant of a declaration of design compliance. For CAMO/CAO approved AMPs, the CAMO/CAO must provide a copy of the justifications for any deviations from the instructions issued by the DAH or the declarant of a declaration of design compliance.

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Tasks or intervals (e.g. escalations) alternative to those of the ICA issued by the DAH or the declarant and selected by the CAMO or CAO for the AMP do not need to be approved by the competent authority. Justification of these deviations are to be kept by the CAMO or CAO.

When evaluating an alternative to a maintenance task issued or recommended by the DAH or the declarant of a declaration of design compliance, such as the extension of TBO intervals, or when considering not to include a maintenance task, a risk-based approach should be taken, considering aspects such as the operation of the aircraft, type of aircraft, hours and years in service, maintenance of the aircraft, compensating measures, redundancy of components etc.

Deviations from recommendations may invalidate warranty on the aircraft/component. The owner is not required to justify any deviation to the Authority or a CAMO/CAO.

The following table (AMC1 ML.A.302(c)) provides more details of aspects that should be considered when evaluating an alternative to a maintenance task or considering not to include a task.

	Examples
Ops Approval	<p>HIGHER RISK: commercial operation, commercial flight training</p> <p>MEDIUM RISK: flight training by an association, non-commercial specialised operations (SPO)</p> <p>LOWER RISK: private</p>
Flight Rules	<p>HIGHER RISK: instrument flight rules (IFR)</p> <p>MEDIUM RISK: visual flight rules (VFR) at night</p> <p>LOWER RISK: VFR by day</p>
Aircraft Weight	<p>HIGHER RISK: Other than ELA1</p> <p>MEDIUM RISK: ELA1 aircraft other than light sport aeroplanes (LSA), very light aircraft (VLA), sailplanes and powered sailplanes</p> <p>LOWER RISK: LSA, VLA, sailplanes and powered sailplanes</p>
Who manages the airworthiness of the aircraft?	<p>HIGHER RISK: owner</p> <p>LOWER RISK: CAMO/CAO</p>
Who maintains the aircraft?	<p>HIGHER RISK: pilot-owner</p> <p>MEDIUM RISK: independent certifying staff</p> <p>LOWER RISK: maintenance organisation</p>
Time in service (flight hours, years)	<p>HIGHER RISK: very high number of hours or years</p> <p>MEDIUM RISK: medium number of hours or years</p> <p>LOWER RISK: low number of hours or years</p>
Aircraft utilisation	<p>HIGHER RISK: less than 50 h per year</p> <p>MEDIUM RISK: around 200 h per year</p> <p>LOWER RISK: more than 400 h per year</p>
ACAM findings	<p>HIGHER RISK: numerous findings in ACAM or ramp inspections</p>

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	MEDIUM RISK: few findings in ACAM inspections LOWER RISK: rare findings in ACAM inspections
System redundancy (for components such as engine/propeller)	HIGHER RISK: single-engined aircraft LOWER RISK: multi-engined aircraft
Supplementary maintenance measures	HIGHER RISK: no supplementary measures LOWER RISK: supplementary measures (such as oil analysis, engine data monitoring, boroscope inspections, corrosion inspections etc.)
Risk factor of the component failure	HIGHER RISK: engine failure on a helicopter MEDIUM RISK: engine failure on an aeroplane LOWER RISK: sailplane, or powered sailplane

## Declaration

- a. When declared by the owner, the AMP shall contain a signed statement by which the owner declares that this is the AMP for the particular aircraft registration and that she/he is fully responsible for its content and, in particular, for any deviations from the instructions issued by the DAH or the declarant of a declaration of design compliance.
- b. When approved by the CAMO or CAO, the AMP shall be signed by this organisation, which shall retain records with the justification for any deviation introduced to the instructions issued by the DAH or the declarant of a declaration of design compliance.

## Template

EASA has provided a [template for the AMP](#) in the Acceptable Means of Compliance (AMC) to Part ML. This is available in an editable format on the [IAA website](#).

Minimum Inspection Programmes for Aeroplanes, (Powered) Sailplanes and Balloons have also been published in the AMC. For ease of use an editable version of these documents are available on the IAA website. <https://www.iaa.ie/general-aviation/maintenance/aircraft-maintenance-programme-for-light-aircraft>.

No MIP has been published by EASA for rotorcraft, so the owner/CAMO/CAO must review the instructions issued by the DAH or the declarant of a declaration of design compliance to develop an appropriate AMP.

## Review of the AMP

The regulation requires that the AMP is reviewed annually in order to assess its effectiveness. This review may be performed by the person performing the Airworthiness Review or the CAMO/CAO managing the aircraft.

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If the review shows discrepancies on the aircraft linked to deficiencies in the content of the AMP, the AMP shall be amended accordingly.

As a minimum, revisions of documents affecting the programme basis need to be considered for including in the AMP during the annual review. Applicable mandatory requirements for compliance with Part 21 should be incorporated into the AMP as soon as possible. e.g. Airworthiness Directives or Airworthiness Limitation Items.

The owner, who is responsible for the Owner-Declared AMP, must ensure that the annual review is carried out. A checklist is provided in Appendix 2 to this AAM which may be used to document the review.

## 5 Informing the IAA

AMPs previously approved by the IAA shall remain approved until amended or cancelled. Owners/ CAMOs/ CAOs must inform the IAA if they wish to cancel a previously approved AMP and transfer to an ODMP or a CAMO/CAO approved AMP. Appendix I may be used to inform the IAA of this.

**Is there a Fee?** No, there is no fee for informing the IAA of the cancellation of an approved AMP.

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## Appendix 1 to AAM 10

### Cancellation of approved Aircraft Maintenance Programme

Aircraft Registration	Type	Owner/CAMO/CAO name

To whom it may concern,

The aircraft, as detailed above, is subject to EASA Part ML.

Please cancel the currently approved AMP for this aircraft (or remove this registration, in the case where it is listed on a combined AMP) AMP Number: MS-GA-\_\_\_\_\_.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_

Position: \_\_\_\_\_ (if signing on behalf of a company/club/group)

#### Documents to be included

- Flight Manual approval certificate, if applicable (a replacement certificate will be sent to you)
- Cancelled Aircraft Maintenance Programme approval certificate

#### Contact Details

In the event that the IAA needs to contact you in relation to this, please provide a suitable contact email/phone number. Otherwise, correspondence will be sent to the address of the registered owner.

(This information will not be shared with any other organisation, with the exception of the AAIU, if necessary)

Submit this document to [awsd@iaa.ie](mailto:awsd@iaa.ie) or AWSD, Irish Aviation Authority, 11-12 D'Olier St., Dublin 2, Ireland.

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## Appendix 2 to AAM 10

When reviewing the effectiveness of the AMP, the AR staff (or the CAMO/CAO staff if the review of the AMP is not performed in conjunction with an AR) may need to review the maintenance carried out during the last 12 months, including unscheduled maintenance. To this end, he or she should receive the records of all the maintenance performed during that year from the owner/CAMO/CAO.

When reviewing the results of the maintenance performed during that year and the results of the AR, attention should be paid as to whether the defects found could have been prevented by introducing in the maintenance programme certain instructions issued by the DAH or the declarant of a declaration of design compliance which were initially disregarded by the owner, CAMO or CAO.

Appendix 2 - Annual Review of AMP – Checklist for use with EASA template (page 1 of 3)				
Date:		AMP Reference: (include registration)		
Reviewed by (Name):				
Task	Programme Ref.	Prompt	Not OK	OK
1.	<b>Block 1</b>	Check Aircraft Registration, Type and Serial Number are correct and the Owner's name is correct.		
2.	<b>Block 2</b>	Check that the correct Basis for the Maintenance Programme is selected		
3.	<b>Block 3</b>	Check that the applicable data referenced is correct (no requirement to include the revision) (N/A if using MIP)		
4.	<b>Block 4</b>	Check that maintenance due to specific equipment and modifications has been reviewed and noted as adopted/not- adopted/deviated from.		
5.	<b>Block 4</b>	Check that maintenance due to repairs implemented has been reviewed and noted as adopted/not-adopted/deviated from.		
6.	<b>Block 4</b>	Check that maintenance due to life-limited components has been reviewed and noted as adopted/not- adopted/deviated from.		
7.	<b>Block 4</b>	Check that maintenance due to Mandatory Continuing Airworthiness Information (ALI, CMR, TCDS) has been reviewed and included in the AMP.		
8.	<b>Block 4</b>	Check that maintenance due to maintenance recommendations such as TBO intervals, issued through SBs, SLs and other non-mandatory service information has been reviewed and noted as adopted/not-adopted/deviated from.		
9.	<b>Block 4</b>	Check that maintenance related to repetitive Airworthiness Directives has been reviewed and included in the AMP.		
10.	<b>Block 4</b>	Check that maintenance related to specific operational/airspace directives/requirements has been reviewed and noted as adopted/not-adopted/deviated from.		



## Appendix 2 - Annual Review of AMP – Checklist

(page 2 of 3)

Task	Ref	Prompt	Not OK	OK
11.	<b>Block 4</b>	Check that maintenance related to operational approvals has been reviewed and included in the AMP.		
12.	<b>Block 5</b>	Check that an indication has been made in Block 5. If 'Yes', also review Appendix C.		
13.	<b>Block 6</b>	If the Pilot-Owner performs maintenance, check that this block is signed and contains the correct information.		
14.	<b>Block 7</b>	Check that the AMP is either Self-Declared by the owner or approved by the CAMO/CAO.		
15.	<b>Block 8</b>	Check that the AMP is certified in this block by the owner or CAMO/CAO		
16.	<b>Block 9</b>	Check that appendices are available for each Yes box ticked.		
17.	<b>AMC ML.A.302(c)(9)</b>	Consider the results of the maintenance performed during the year, they may reveal that the AMP is not adequate.		
18.	<b>AMC ML.A.302(c)(9)</b>	Consider the results of the Airworthiness Review performed, it may reveal that the AMP is not adequate.		
19.	<b>AMC ML.A.302(c)(9)</b>	Consider revisions introduced on the documents affecting the programme basis, such as the ML.A.302(d) MIP or the data issued by the DAH or the declarant of a declaration of design compliance. .		
20.	<b>AMC ML.A.302(c)(9)</b>	Consider changes in the aircraft configuration, and type and specificity of operation		
21.	<b>AMC ML.A.302(c)(9)</b>	Consider changes in the list of pilot-owners		
22.	<b>AMC ML.A.302(c)(9)</b>	Consider applicable mandatory requirements for compliance with Part 21 or Part 21 Light such as airworthiness directives (ADs), airworthiness limitations, certification maintenance requirements and specific maintenance requirements contained in the type certificate data sheet (TCDS) or airworthiness data sheet (for aircraft subject to a declaration of design compliance)		
23.	<b>Appendix A</b>	Check content of MIP to ensure it isn't less than EASA MIP.		
24.	<b>Appendix B</b>	Check that any maintenance due to specific equipment and modifications, where being adopted, are included here		
25.	<b>Appendix B</b>	Check that any maintenance due to repairs, where being adopted, are included here		
26.	<b>Appendix B</b>	Check that any maintenance due to life-limited components, where being adopted, are included here		

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27.	<b>Appendix B</b>	Check that any maintenance due to maintenance recommendations, where being adopted, are included here		
<b>Appendix 2 - Annual Review of AMP – Checklist</b> (page 2 of 3)				
Task	Ref	Prompt	Not OK	OK
28.	<b>Appendix B</b>	Check that any maintenance due to Mandatory Continuing Airworthiness Instructions (ALI, CMR, TCDS) are included		
29.	<b>Appendix B</b>	Check that any maintenance related to repetitive Airworthiness Directives are included here		
30.	<b>Appendix B</b>	Check that any maintenance related to specific operational/airspace directives/requirements are included here		
31.	<b>Appendix B</b>	Check that any maintenance related to the type of operation or operational approval are included here		
32.	<b>Appendix B</b>	Check that all maintenance recommendations reviewed are listed here, including an indication whether they are adopted, not adopted or adopted with deviations		
33.	<b>Appendix C</b>	If being used, check that the alternative tasks are not less restrictive than the MIP		
34.	<b>Appendix C</b>	If being used, check that the alternative tasks against their source.		
<p>If the review shows <u>discrepancies on the aircraft</u> linked to deficiencies in the content of the AMP, the AMP shall be amended accordingly.</p> <p>If the review shows deficiencies in the AMP, inform the owner.</p> <p>Attached documentary evidence of what discrepancies on the aircraft or deficiencies in the AMP were noted.</p>				
<b>Signature:</b>			<b>Date:</b>	