



# Proposed amendments to Annex I - (Part M), Annex II - (Part 145), Annex Vb - (Part ML) and Annex Vd - (Part CAO) to UK Regulation (EU) 1321/2014 Continuing Airworthiness Requirements

Consultation proposal under Rulemaking Task 0201 – Part 66 and  
Part 147 Regulation Rule and Associated AMC and GM change.

January 2026

Published by the Civil Aviation Authority, 2026

Civil Aviation Authority  
Aviation House  
Beehive Ring Road  
Crawley  
West Sussex  
RH6 0YR

You can copy and use this text but please ensure you always use the most up to date version and use it in context so as not to be misleading, and credit the CAA.

First published 2026

First edition

Enquiries regarding the content of this publication should be addressed to: [awconsultations@caa.co.uk](mailto:awconsultations@caa.co.uk)

The latest version of this document is available in electronic format at: [www.caa.co.uk](http://www.caa.co.uk)

## Key

---

Highlighted grey – new text.

~~Strikethrough~~ – to be deleted. In red where strikethrough is not obvious.

Blue text – Editorial note or intent of proposed amendment.

## Annex I (Part M)

---

### Appendix VII – Complex Maintenance Tasks

The following constitutes the complex maintenance tasks referred to in point M.A.801(b):

1. The modification, repair or replacement by riveting, bonding, laminating, or welding of any of the following airframe parts:
  - a. a box beam;
  - b. a wing stringer or chord member;
  - c. a spar;
  - d. a spar flange;
  - e. a member of a truss-type beam;
  - f. the web of a beam;
  - g. a keel or chine member of a flying boat hull or a float;
  - h. a corrugated sheet compression member in a wing or tail surface;
  - i. a wing main rib;
  - j. a wing or tail surface brace strut;
  - k. an engine mount;
  - l. a fuselage longeron or frame;
  - m. a member of a side truss, horizontal truss or bulkhead;
  - n. a seat support brace or bracket;
  - o. a seat rail replacement;
  - p. a landing gear strut or brace strut;
  - q. an axle;
  - r. a wheel; and

- s. a ski or ski pedestal, excluding the replacement of a low-friction coating.
2. The modification or repair of any of the following parts:
  - a. aircraft skin, or the skin of an aircraft float, if the work requires the use of a support, jig or fixture;
  - b. aircraft skin that is subject to pressurization loads, if the damage to the skin measures more than 15 cm (6 inches) in any direction;
  - c. a load-bearing part of a control system, including a control column, pedal, shaft, quadrant, bell crank, torque tube, control horn and forged or cast bracket, but excluding
    - (i) the swaging of a repair splice or cable fitting, and
    - (ii) the replacement of a push-pull tube end fitting that is attached by riveting; and
  - d. any other structure, not listed in (1), that a manufacturer has identified as primary structure in its maintenance manual, structural repair manual or instructions for continuing airworthiness.
3. The performance of the following maintenance on a piston engine:
  - a. dismantling and subsequent reassembling of a piston engine other than (i) to obtain access to the piston/cylinder assemblies; or (ii) to remove the rear accessory cover to inspect and/or replace oil pump assemblies, where such work does not involve the removal and re-fitment of internal gears;
  - b. dismantling and subsequent reassembling of reduction gears;
  - c. welding and brazing of joints, other than minor weld repairs to exhaust units carried out by a suitably approved or authorised welder but excluding component replacement;
  - d. the disturbing of individual parts of units which are supplied as bench tested units, except for the replacement or adjustment of items normally replaceable or adjustable in service.
- 3a. The performance of maintenance on the power plant that would require disassembly of engine(s), main batteries or fuel cell(s), other than removing them from the aircraft and reinstalling them back (including removal/installation of engine bearings).
- 3b. The performance of maintenance on high-pressure reservoirs and components belonging to high-pressure lines / systems related to the power plant.
4. The balancing of a propeller, except:
  - a. for the certification of static balancing where required by the maintenance manual;
  - b. dynamic balancing on installed propellers using electronic balancing equipment where permitted by the maintenance manual or other approved airworthiness data;
5. Any additional task that requires:

- a. specialized tooling, equipment or facilities; or
- b. significant coordination procedures because of the extensive duration of the tasks and the involvement of several persons.

**0201.82 – Intent of proposed changes – Part M - Appendix VII**

Appendix VII is amended to account for complex maintenance tasks on aircraft using new technologies.

New points 3a and 3b are added after, and separate to, point 3.

Point 3a accounts for maintenance on electric powerplants that are not currently covered under the current wording.

Point 3b accounts for the high-pressure systems that may be added for technology such as hydrogen powered aircraft.

## Annex II (Part-145)

---

### **145.A.30 Personnel Requirements**

(a) The organisation must appoint an accountable manager that has corporate authority to ensure that all maintenance activities of the organisation can be financed and carried out in accordance with Regulation (EU) 2018/1139. The accountable manager must:

1. ensure that all necessary resources are available to accomplish maintenance in accordance with this Annex, Annex I (Part-M) and Annex Vb (Part-ML), as applicable, to support the organisation certificate;
2. establish and promote the safety policy specified in point 145.A.200(a)(2);
3. demonstrate a basic understanding of this Regulation.

(b) The accountable manager—

1. must nominate a person or group of persons representing the management structure for the maintenance functions and with the responsibility to ensure that the organisation works in accordance with the MOE and approved procedures. It must be made clear in the procedures who deputises for a particular person in the case of lengthy absence of that person;
2. must nominate a person or group of persons with the responsibility to manage the compliance monitoring function as part of the management system;
3. must nominate a person or group of persons with the responsibility to manage the development, administration and maintenance of effective safety management processes as part of the management system.

(c) The person or group of persons nominated in accordance with points (b)(1), (2) and (3) must have a responsibility to the accountable manager and direct access to them to keep them properly informed on compliance and safety matters. Additionally, they must be able to demonstrate relevant knowledge, background and satisfactory experience related to aircraft or component maintenance and demonstrate a working knowledge of this Regulation.

(d) The organisation must have a maintenance resource plan to ensure it has sufficient and appropriately qualified staff to plan, perform, supervise, inspect and monitor the organisation's activities in accordance with the terms of the approval. In addition, the organisation must have a procedure to reassess the work intended to be carried out when the actual staff availability is reduced compared to the planned staffing level for a particular work shift or period.

(e) The organisation must establish and control the competency of the personnel involved in any maintenance, airworthiness reviews, safety management and compliance monitoring in accordance with a procedure and to a standard agreed with the CAA. In addition to the necessary expertise related to the job function, the competency of the personnel must include an understanding of the application of safety management

principles, including human factors and human performance issues, which is appropriate to their function and responsibilities in the organisation.

(f) The organisation ~~must shall~~ ensure that personnel who carry out or control a continued-airworthiness non-destructive test of aircraft structures or components, or both, are appropriately qualified for the particular non-destructive test in accordance with the European or equivalent standard recognised by the CAA. Personnel who carry out any other specialised task ~~must shall~~ be appropriately qualified in accordance with officially recognised standards. By derogation from this point, personnel referred to in point (g), points (h)(1) and (h)(2), qualified in category B1, B3 or L in accordance with Annex III (Part-66), may carry out and/or control colour contrast dye penetrant tests.

(g) Any organisation maintaining aircraft, except where stated otherwise in point (j), ~~must shall~~ in the case of aircraft line maintenance, have appropriate aircraft-rated certifying staff qualified as category B1, B2, B2L, B3 and L, as appropriate, in accordance with Annex III (Part-66) and point 145.A.35. In addition such organisations may also use appropriately task-trained certifying staff holding the privileges set out in points 66.A.20(a)(1) and 66.A.20(a)(3)(ii) and qualified in accordance with Annex III (Part-66) and point 145.A.35 to carry out minor scheduled line maintenance and simple defect rectification. The availability of such certifying staff ~~must shall~~ not replace the need for category B1, B2, B2L, B3 and L certifying staff, as appropriate.

(h) Any organisation maintaining aircraft, except where stated otherwise in point (j), ~~must shall~~:

1. in the case of base maintenance of complex motor-powered aircraft, have appropriate aircraft-type-rated certifying staff, qualified as category C in accordance with Annex III (Part-66) and point 145.A.35. In addition, the organisation ~~must shall~~ have sufficient aircraft-type-rated staff qualified as category B1 and B2, as appropriate, in accordance with Annex III (Part-66) and point 145.A.35 to support the category C certifying staff.

- (i) Category B1 and B2 support staff ~~must shall~~ ensure that all relevant tasks or inspections have been carried out to the required standard before the category C certifying staff issues the certificate of release to service.

- (ii) The organisation ~~must shall~~ maintain a register of any such category B1 and B2 support staff.

- (iii) The category C certifying staff ~~must shall~~ ensure that compliance with point (i) has been met and that all work required by the customer has been accomplished during the particular base maintenance check or work package, and ~~must shall~~ also assess the impact of any work not carried out, with a view to either requiring its accomplishment or agreeing with the operator to defer such work to another specified check or time limit.

2. in the case of base maintenance of aircraft other than complex motor-powered aircraft, have one of the following:

- (i) appropriate aircraft-rated certifying staff, qualified as category B1, B2, B2L, B3 and L, as appropriate, in accordance with Annex III (Part-66) and point 145.A.35;

(ii) appropriate aircraft-rated certifying staff, qualified in category C or L5, as applicable, and assisted by support staff, as set out in point 145.A.35(a)(i1).

(i) Component certifying staff ~~must~~ shall be qualified in accordance with Article 5(6) and point 145.A.35.

(j) By derogation to points (g) and (h), in relation to the obligation to comply with Annex III (Part-66), the organisation may use certifying staff and support staff that are qualified in accordance with the following provisions:

1. For base maintenance carried out at a location outside the United Kingdom, certifying staff and support staff may be qualified in accordance with the national aviation regulations of the State in which the organisation facility is located subject to the conditions specified in Appendix IV to this Annex.

2. For line maintenance carried out at a line station located outside the United Kingdom, the certifying staff may be qualified, subject to the conditions specified in Appendix IV to this Annex, in accordance with the following alternative conditions:

- (i) national aviation regulations of the State in which the line station is located,
- (ii) national aviation regulation of the State in which the organisation's principal place of business is located.

3. For a repetitive pre-flight airworthiness directive which specifically states that the flight crew may carry out such airworthiness directive, the organisation may issue a limited certification authorisation to the pilot on the basis of the flight crew licence held. In that case, the organisation must ensure that the pilot has carried out sufficient practical training ensuring that the pilot can accomplish the airworthiness directive.

4. If an aircraft is operated away from a supported location, the organisation may issue a limited certification authorisation to the pilot on the basis of the flight crew licence held, subject to being satisfied that the pilot has carried out sufficient practical training ensuring that the pilot can accomplish the specified tasks.

5. In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff are available, the organisation contracted to provide maintenance support may issue a one-off certification authorisation:

- (i) to one of its employees holding equivalent type authorisations on aircraft of similar technology, construction and systems; or
- (ii) to any person with not less than five years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person.

All such cases as specified in this point must be reported to the CAA within seven days after issuing such certification authorisation. The organisation issuing the one-off authorisation ~~must~~ shall ensure that any such maintenance that could affect flight safety is re-checked by an appropriately approved organisation.

(k) If the organisation performs airworthiness reviews and issues the corresponding airworthiness review certificate in accordance with point ML.A.903 of Annex Vb (Part-ML), it ~~must~~ shall have airworthiness review staff qualified and authorised in accordance with point 145.A.37:

(l) Provision repealed before document was retained.

**0201.83 – Intent of proposed changes – Part 145.A.30**

Point (h)(2)(ii) is amended to include L5 licences and correct a reference to 145.A.35 amended under SI No. 588/2023.

**APPENDIX II CLASS AND RATING SYSTEM FOR THE TERMS OF APPROVAL OF PART-145 MAINTENANCE ORGANISATIONS**

(a) Except as stated otherwise for the smallest organisations referred to in point (m), the table in point (l) provides the possible classes and ratings to be used to establish the terms of approval of the certificate of the organisation approved in accordance with Annex II (Part-145). An organisation must be granted terms of approval that range from a single class and rating with limitations to all classes and ratings with limitations.

(b) In addition to the table in point (l), each maintenance organisation is required to indicate its scope of work in its MOE.

(c) Within the approval classes and ratings established by the CAA, the scope of work specified in the MOE defines the exact limits of its approval. It is therefore essential that the approval classes and ratings and the organisation's scope of work match.

(d) A “category A class rating” means that the maintenance organisation may carry out maintenance on aircraft and components (including engines, auxiliary power units (APUs) or both), in accordance with the aircraft maintenance data or, if agreed by the CAA, in accordance with the component maintenance data, only while such components are fitted to the aircraft. Nevertheless, such an A-rated maintenance organisation may temporarily remove a component for maintenance in order to improve access to that component, except when its removal generates the need for additional maintenance that the organisation is not approved to perform. Such removal of component for maintenance by A-rated maintenance organisation must be subject to an appropriate control procedure in the MOE. The limitation column must specify the scope of such maintenance in order to indicate the extent of the approval.

(e) Category A class ratings are subdivided into “Base” or “Line” maintenance categories. Such an organisation may be approved for either “Base” or “Line” maintenance, or both. It should be noted that a “Line” facility located at a main base facility requires a “Line” maintenance approval.

(f) A “category B class rating” means that the maintenance organisation may carry out maintenance on uninstalled engines, APUs and engines, APU components or a combination of them, in accordance with the engine or APU maintenance data or both, or, if agreed by the CAA, in accordance with the component maintenance data, only while such components are fitted to the engine, the APU or both. Nevertheless, such a B-rated

approved maintenance organisation may temporarily remove a component for maintenance in order to improve access to that component, except when its removal generates the need for additional maintenance that the organisation is not approved to perform. The limitation column must specify the scope of such maintenance, thereby indicating the extent of the approval. A maintenance organisation that is approved with a category B class rating may also carry out maintenance on an installed engine during aircraft base and line maintenance, provided that an appropriate control procedure in the MOE has been approved by the CAA. The scope of work in the MOE must reflect those activities if they are permitted by the CAA.

(g) A “category C class rating” means that the maintenance organisation may carry out maintenance on uninstalled components (excluding complete engines and APUs) that are intended to be fitted on the aircraft or the engine or APU. The limitation column must specify the scope of such maintenance, thereby indicating the extent of the approval. A maintenance organisation that is approved with a category C class rating may also carry out maintenance on an installed component (other than a complete engine or APU) during aircraft base and line 53 maintenance, or at an engine or APU maintenance facility provided that an appropriate control procedure in the MOE has been approved by the CAA. The scope of work in the MOE must reflect those activities if they are permitted by the CAA.

(h) A “category D class rating” means a self-contained class rating that is not necessarily related to a specific aircraft, engine or other component. The D1 – Non-Destructive Testing (“NDT”) rating is only necessary for a maintenance organisation that carries out NDT as a particular task for another organisation. A maintenance organisation that is approved with a class rating in the A, B or C category may carry out NDT on products that it maintains without the need for a D1 class rating provided that the MOE contains appropriate NDT procedures.

(i) The limitation column is intended to give the CAA the flexibility to customise an approval for any particular organisation. Ratings may only be mentioned on the approval if they are appropriately limited. The table in point (l) specifies the types of limitations that are possible. It is acceptable to stress in the limitation column the maintenance task rather than the type or manufacturer of the aircraft or engine, if that is more appropriate to the organisation (an example could be avionics systems installations and the related maintenance). If that is mentioned in the limitation column, it indicates that the maintenance organisation is approved to carry out maintenance up to and including that particular type or task.

(j) When reference is made to the series, type and group in the limitation column of class A and B, it must be understood as follows: “series” means a specific type series such as the Airbus 300, 310, 319, the Boeing 737-300 series, RB211-524 series, Cessna 150, Cessna 172, Beech 55 series or the Continental O-200 series; “type” means a specific type or model such as the Airbus 310-240 type, the RB 211-524 B4 type, or the Cessna 172RG type. Any number of series or types may be quoted; “group” means, for example, Cessna single piston engine aircraft or Lycoming nonsupercharged piston engines, etc.

(k) By way of derogation from point 145.A.85, where a component capability list is used that could be subject to frequent amendments, then the organisation may propose to include such amendments in the procedure referred to in point 145.A.70(a)(10) for changes not requiring prior approval.

#### (l) Limitation

CLASS	RATING	LIMITATION	BASE	LINE
AIRCRAFT	A1  Aeroplanes above 5,700kg maximum take-off mass (MTOM)	[Must state the aeroplane manufacturer or the group or series or type and/or the maintenance tasks] Example: Airbus A320 Series	[YES/NO](*)	[YES/NO](*)
	A2  Aeroplanes of 5,700kg MTOM and below	[Must state the aeroplane manufacturer or the group or series or type and/or the maintenance tasks] Example: DHC-6 Twin Otter Series State whether the issuing of airworthiness review certificates is authorised (only possible for aircraft covered by Annex 5b (Part-ML))	[YES/NO](*)	[YES/NO](*)
	A3  Helicopters	[Must state the helicopter manufacturer or the group or series or type and/or the maintenance task(s)] Example: Robinson R44 State whether the issuing of airworthiness review certificates is authorised (only possible for aircraft covered by Annex 5b (Part-ML))	[YES/NO](*)	[YES/NO](*)
	A4  Aircraft other than A1, A2 and A3 aircraft	[Must state the aircraft category (sailplane, balloon, airship, etc.), the manufacturer or group or series or type and/or the maintenance task(s)] State whether the issuing of airworthiness review certificates is authorised (only possible for aircraft covered by Annex 5b (Part-ML))	[YES/NO](*)	[YES/NO](*)
ENGINES	B1	[Must state the engine series or type and/or the maintenance task(s)]		

CLASS	RATING	LIMITATION	BASE	LINE
	Turbine	Example: PT6A Series		
	B2 Piston	[Must state the engine manufacturer or group or series or type and/or the maintenance task(s)]		
	B3 APU	[Must state the engine manufacturer or series or type and/or the maintenance task(s)]		
	B4 Engines other than B1, B2 and B3	[Must state the engine manufacturer or series or type and/or the maintenance task(s)]		
COMPONENTS OTHER THAN COMPLETE ENGINES OR APUS	C1 Air Cond & Press	[Must state the aircraft type or aircraft manufacturer or component manufacturer or the particular component and/or cross-refer to a capability list in the exposition and/or the maintenance task(s)] Example: PT6A Fuel Control		
	C2 Auto Flight			
	C3 Comms and Nav			
	C4 Doors — Hatches			
	C5 Electrical Power & Lights			
	C6 Equipment			
	C7 Engine – APU			
	C8 Flight Controls			
	C9 Fuel			
	C10 Helicopter – Rotors			
	C11 Helicopter – Trans			
	C12 Hydraulic Power			
	C13 Indicating – recording system			
	C14 Landing Gear			
	C15 Oxygen			
	C16 Propellers			
	C17 Pneumatic & Vacuum			
	C18 Protection ice/rain/fire			
	C19 Windows			
	C20 Structural			
	C21 Water ballast			
	C22 Propulsion Augmentation			

CLASS	RATING	LIMITATION	BASE	LINE	
	C23 Other				
SPECIALISED SERVICES	D1 Non-Destructive Testing	[Must state particular NDT method(s)]			
(*) Delete as appropriate.					

(m) A maintenance organisation which employs only one person to both plan and carry out all its maintenance activities can only hold limited terms of approval. The maximum permissible limits are as follows.

Class	Rating	Limitation
Aircraft	A2	Piston engine aeroplane of 5,700 kg MOTM or less AEROPLANES of 5 700 KG MTOM OR LESS WITH PISTON ENGINE or ELECTRIC POWER PLANT WITH NO FUEL CELL
Aircraft	A3	Single piston engine helicopter of 3,175 kg MTOM or less HELICOPTERS of 3 175 KG MTOM OR LESS WITH SINGLE-PISTON ENGINE or ELECTRIC POWER PLANT WITH NO FUEL CELL
Aircraft	A4	No limitations SAILPLANES, BALLOONS, AIRSHIPS AND ANY AIRCRAFT of 3 175 KG MTOM OR LESS WITH SINGLE-PISTON ENGINE or ELECTRIC POWER PLANT WITH NO FUEL CELL
Engines	B2	Less than 450HP
Engines	B4	Electric engine.
Components other than complete engines or APUs	C1 to C223	As per capability list
Specialised Services	D1 NDT	NDT method(s) to be specified

(n) It should be noted that such an organisation may be further limited by the competent authority CAA in the terms of approval depending on the capabilities of the particular organisation.

#### 0201.84 – Intent of proposed changes – Part 145 Appendix II

Tables 1 and 2 are amended to account for electric powerplant and other innovative aircraft or powerplants.

## Annex Vb (Part ML)

---

### ML.A.302 Aircraft maintenance programme

- (a) The maintenance of each aircraft ~~must~~shall be organised in accordance with an AMP.
- (b) The AMP and any subsequent amendments thereto ~~must~~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.

The owner declaring the AMP in accordance with point (b)(1) or the organisation approving the AMP in accordance with point (b)(2) ~~must~~shall keep the AMP updated.

- (c) The AMP:
  - (1) ~~must~~shall clearly identify the owner of the aircraft and the aircraft to which it relates, including any installed engine and propeller, as applicable;
  - (2) ~~must~~shall include, alternatively:
    - (a) the tasks or inspections contained in the applicable minimum inspection programme ('MIP') referred to in point (d);
    - (b) the instructions for continuing airworthiness ('ICA') issued by the design approval holder ('DAH');
  - (3) may include additional maintenance actions to those referred to in point (c)(2) or maintenance actions alternative to those referred to in point (c)(2)(b) at the proposal of the owner, CAMO or CAO, once approved or declared in accordance with point (b). Alternative maintenance actions to those referred to in point (c)(2)(b) ~~must~~shall not be less restrictive than those set out in the applicable MIP;
  - (4) ~~must~~shall include all the mandatory continuing airworthiness information, such as repetitive ADs, the airworthiness limitation section ('ALS') of the ICAs, and specific maintenance requirements contained in the type certificate data sheet ('TCDS');
  - (5) ~~must~~shall identify any additional maintenance tasks to be performed because of the specific aircraft type, aircraft configuration and type and specificity of operation, whereas the following elements ~~must~~shall be taken into consideration as a minimum:
    - (a) specific installed equipment and modifications of the aircraft;
    - (b) repairs carried out in the aircraft;
    - (c) life-limited components and flight-safety-critical components;
    - (d) maintenance recommendations, such as time between overhaul ('TBO') intervals, issued through service bulletins, service letters, and other non-mandatory service information;

- (e) applicable operational directives or requirements related to the periodic inspection of certain equipment;
- (f) special operational approvals;
- (g) use of the aircraft and operational environment;

(6) must shall identify whether the Pilot-owners are authorised to perform maintenance;

(7) when declared by the owner, must shall contain a signed statement by which the owner declares that this is the AMP for the particular aircraft registration and that he is fully responsible for its content and, in particular, for any deviations from the DAH's recommendations;

(8) when approved by the CAMO or CAO, must shall be signed by this organisation, which must shall retain records with the justification for any deviation introduced to the DAH's recommendations;

(9) must shall be reviewed at least annually in order to assess its effectiveness, and this review shall be performed, alternatively:

- (a) in conjunction with the airworthiness review of the aircraft by the person who performs such an airworthiness review;
- (b) by the CAMO or CAO managing the continuing airworthiness of the aircraft in those cases where the review of the AMP is not performed in conjunction with an airworthiness review.

If the review shows deficiencies of the aircraft linked with deficiencies in the content of the AMP, the AMP must shall be amended accordingly. In this case the person performing the review shall inform the CAA if he does not agree with the measures amending the AMP taken by the owner, CAMO or CAO. The CAA must shall decide which amendments to the AMP are necessary, raising the corresponding findings and, if necessary, reacting in accordance with point ML.B.304.

(d) A MIP:

(1) must shall contain the following inspection intervals:

- (a) for aeroplanes, touring motor gliders ('TMGs') and balloons, every annual or 100-h interval, whichever comes first, to which a tolerance of 1 month or 10 h may be applied. The next interval must shall be calculated as from the time the inspection takes place;
- (b) for sailplanes and powered sailplanes other than TMG, every annual interval to which a tolerance of 1 month may be applied. The next interval must shall be calculated as from the time the inspection takes place;

(2) must shall contain the following, as applicable to the aircraft type:

- (a) servicing tasks as required by the DAH's requirements;
- (b) inspection of markings;

(c) review of weighing records and weighing in accordance with Regulation (EU) No 965/2012, Regulation (EU) 2018/395 and Regulation (EU) 2018/1976;

(d) operational test of transponder (if installed);

(e) functional test of the pitot-static system;

(f) in the case of aeroplanes, as applicable to the aircraft powerplant:

(i) operational tests for power and revolutions per minute (rpm), magnetos, fuel and oil pressure, engine temperatures;

(ii) for engines equipped with automated engine control, the published run-up procedure;

(iii) for dry-sump engines, engines with turbochargers and liquid-cooled engines, an operational test for signs of disturbed fluid circulation;

(iv) in respect of a power plant other than piston engine, the maintenance tasks as defined in the ICA issued by the DAH of the aeroplane;

(g) inspection of the condition and attachment of the structural items, systems and components corresponding to the following areas:

(i) for aeroplanes:

airframe, cabin and cockpit, landing gear, wing and centre section, flight controls, empennage, avionics and electrics, power plant, clutches and gearboxes, propeller and miscellaneous systems, such as the ballistic rescue system;

(ii) for sailplanes and powered sailplanes:

airframe, cabin and cockpit, landing gear, wing and centre section, empennage, avionics and electrics, power plant (for powered sailplanes) and miscellaneous systems, such as removable ballast and/or drag chute and controls, as well as water ballast system;

(iii) for hot-air balloons:

envelope, burner, basket, fuel containers, equipment and instruments;

(iv) for gas balloons:

envelope, basket, equipment and instruments.

~~As long as this Annex does not specify an MIP for airships and rotorcraft, their AMP shall be based on the ICA issued by the DAH, as referred to in point (c)(2)(b).~~

~~For aircraft other than aeroplanes, sailplanes and balloons, where this Annex does not specify an MIP, their AMP must be based on the ICA issued by the DAH, as referred to in point (c)(2)(b).~~

(e) By derogation from points (b) and (c), a declaration by the owner or an approval by a CAMO or CAO is not required, and an AMP document is not required to be produced when the following conditions are met:

(1) all the ICA issued by the DAH are being followed without any deviations;

(2) all maintenance recommendations, such as TBO intervals, issued through service bulletins, service letters, and other non-mandatory service information, are being followed without any deviations;

(3) there are no additional maintenance tasks to be performed resulting from any of the following:

(a) specific installed equipment and modifications of the aircraft;

(b) repairs carried out in the aircraft;

(c) life-limited components and flight-safety-critical components;

(d) special operational approvals;

(e) use of the aircraft and operational environment. Pilot-owners are authorised to perform Pilot-owner maintenance.

(4) This derogation is not applicable if the pilot-owner or, in case of jointly-owned aircraft, any of the pilot-owners is not authorised to perform Pilot-owner maintenance because this has to be specified in the declared or approved AMP.

(f) If the conditions provided for in points (e)(1) to (e)(4) are met, the AMP applicable to the aircraft ~~must~~ shall consist of the following:

(1) the ICA issued by the DAH;

(2) the maintenance recommendations, such as TBO intervals, issued through service bulletins, service letters, and other non-mandatory service information;

(3) the mandatory continuing airworthiness information, such as repetitive ADs, the ALS of the ICA and specific maintenance requirements contained in the TCDS;

(4) the tasks due to specific operational or airspace directives or requirements in relation to particular instruments and equipment.

#### **0201.85 – Intent of proposed changes – ML.A.302**

Point ML.A.302 is amended to account for innovative aircraft that do not meet the traditional definitions. The last paragraph of point (d) is amended to allow for innovative aircraft. The term 'aircraft other than aeroplanes, sailplanes and balloons' replaced 'airships and rotorcraft' to allow for aircraft such as non-conventional helicopters or powered-lift (often called VTOL, see consultation for RMT 0158 for explanation on the definitions for non-conventional helicopter and powered-lift).

## **Appendix III - Complex maintenance tasks not to be released by the pilot-owner**

All of the following constitutes the complex maintenance tasks which, according to Appendix II, ~~must~~ shall not be carried out by the pilot-owner. Those tasks ~~must~~ shall be released either by an approved maintenance organisation or by independent certifying staff:

- (a) the modification, repair or replacement by riveting, bonding, laminating, or welding of any of the following airframe parts:
  - (1) a box beam;
  - (2) a wing stringer or chord member;
  - (3) a spar;
  - (4) a spar flange;
  - (5) a member of a truss type beam;
  - (6) the web of a beam;
  - (7) a keel or chine member of a flying boat hull or a float;
  - (8) a corrugated sheet compression member in a wing or tail surface;
  - (9) a wing main rib;
  - (10) a wing or tail surface brace strut;
  - (11) an engine mount;
  - (12) a fuselage longeron or frame;
  - (13) a member of a side truss, horizontal truss or bulkhead;
  - (14) a seat support brace or bracket;
  - (15) a seat rail replacement;
  - (16) a landing-gear strut or brace strut;
  - (17) an axle;
  - (18) a wheel; and
  - (19) a ski or ski pedestal, excluding the replacement of a low-friction coating;
- (b) the modification or repair of any of the following parts:
  - (1) aircraft skin or the skin of an aircraft float if the work requires the use of a support, jig or fixture;
  - (2) aircraft skin that is subject to pressurisation loads if the damage to the skin measures more than 15 cm (6 in.) in any direction;

(3) a load-bearing part of a control system, including a control column, pedal, shaft, quadrant, bell crank, torque tube, control horn and forged or cast bracket, but excluding:

- (i) the swaging of a repair splice or cable fitting; and
- (ii) the replacement of a push-pull tube end fitting that is attached by riveting;

(4) any other structure not listed in point (a) that a manufacturer has identified as primary structure in their maintenance manual, structural repair manual or instructions for continuing airworthiness;

(c) the performance of all of the following maintenance on a piston engine:

- (1) dismantling and subsequent reassembling of a piston engine other than:
  - (i) to obtain access to the piston/cylinder assemblies; or
  - (ii) to remove the rear accessory cover to inspect and/or replace oil pump assemblies, where such work does not involve the removal and refitment of internal gears;
- (2) dismantling and subsequent reassembling of reduction gears;
- (3) welding and brazing of joints, other-than-minor weld repairs to exhaust units carried out by a suitably approved or authorised welder but excluding component replacement;
- (4) the disturbing of individual parts of units which are supplied as bench-tested units except for the replacement or adjustment of items normally replaceable or adjustable in service;

(Ca) the performance of maintenance on the power plant that would require disassembly of engine(s), main batteries or fuel cell(s), other than removing them from the aircraft and reinstalling them back (including removal/ installation of engine bearings);

(Cb) the performance of maintenance on high-pressure reservoirs and components belonging to high-pressure lines/ systems related to the power plant;

(d) the balancing of a propeller, except:

- (1) for the certification of static balancing where required by the maintenance manual; and
- (2) dynamic balancing on installed propellers using electronic balancing equipment where permitted by the maintenance manual or other approved airworthiness data;

(e) any additional task that requires:

- (1) specialised tooling, equipment or facilities; or
- (2) significant coordination procedures because of the extensive duration of the tasks and the involvement of several persons.

**0201.86 – Intent of proposed changes – Part ML - Appendix III**

Appendix III is amended to account for electric and other innovative powerplant designs.

Point Ca accounts for maintenance on an electric powerplant that is not currently covered under the current wording.

Point Cb accounts for the high-pressure systems that may be added for technology such as hydrogen powered aircraft.

## Annex Vd (Part CAO)

---

### CAO.A.020 Terms of approval

(a) The CAO ~~must~~ shall specify the approved scope of work in its combined airworthiness exposition (CAE), as provided for in point CAO.A.025.

(1) For aeroplanes of more than 2730 kg maximum take-off mass (MTOM) and for helicopters of more than 1200 kg MTOM or certified for more than 4 occupants and for other aircraft which are not ELA2, the scope of work ~~must~~ shall indicate the particular aircraft types. Changes to this scope of work ~~must~~ shall be approved by the CAA in accordance with point (a) of point CAO.A.105 and point (a) of point CAO.B.065.

(2) For engines other than piston or electric ~~For complete turbine engines~~, the scope of work ~~must~~ shall indicate the engine manufacturer or group or series or type or the maintenance task(s). Changes to this scope of work ~~must~~ shall be approved by the CAA in accordance with point (a) of point CAO.A.105 and point (a) of point CAO.B.065.

(3) A CAO which employs only one person for both planning and carrying out of all maintenance tasks cannot hold privileges for the maintenance of:

(a) aeroplanes, ~~equipped with a turbine engine (in the case of aircraft-rated organisations)~~ helicopters and other aircraft which are not ELA2, if their power plant is other than electric or piston engine(s) ~~(in the case of aircraft-rated organisations)~~;

(b) helicopters equipped with a ~~turbine engine or with~~ more than one piston engine ~~(in the case of aircraft-rated organisations)~~;

(c) ~~complete piston engines of 450 HP and above (in the case of engine-rated organisations)~~; and

(d) ~~complete turbine engines (in the case of engine-rated organisations)~~.

(c) ~~complete engines, other than piston engines with output power below 450 HP, or electric engines (in the case of engine-rated organisations)~~.

(4) For aircraft other than those mentioned in point (1), for components different from complete turbine engines and for non-destructive testing (NDT)-specialised services, the scope of work ~~must~~ shall be controlled by the CAO in accordance with the procedure set out in point (a)(11) of point CAO.A.025. For maintenance of components different from complete engines, the scope of work ~~must~~ shall be classified in accordance with the following system ratings:

(i) C1: air conditioning and pressurisation;

(ii) C2: auto flight;

(iii) C3: communications and navigation;

- (iv) C4: doors and hatches;
- (v) C5: electrical power and lights;
- (vi) C6: equipment;
- (vii) C7: engine;
- (viii) C8: flight controls;
- (ix) C9: fuel;
- (x) C10: helicopter and rotors;
- (xi) C11: helicopter transmission;
- (xii) C12: hydraulic power;
- (xiii) C13: indicating and recording system;
- (xiv) C14: landing gear;
- (xv) C15: oxygen;
- (xvi) C16: propellers;
- (xvii) C17: pneumatic and vacuum systems;
- (xviii) C18: protection from ice/rain/fire;
- (xix) C19: windows;
- (xx) C20: structural;
- (xxi) C21: water ballast; and
- (xxii) C22: propulsion augmentation; and
- (xxiii) C23: other.

Organisations obtaining an approval in accordance with this Annex on the basis of an existing organisation approval issued in accordance with Subpart G or Subpart F of Annex I (Part-M) or Annex II (Part-145) in accordance with paragraph 4 of Article 4, ~~must shall~~ include in the scope of work all the necessary details to ensure that the privileges are identical to the ones included in the existing approval.

(b) The CAO approval ~~must shall~~ be issued on the basis of the template set out in Appendix I to this Annex.

(c) A CAO may fabricate, in conformity with maintenance data, a restricted range of parts for use in the course of undergoing work within its own facilities, as indicated in their CAE.

#### **0201.87 – Intent of proposed changes – CAO.A.020**

Point (a)(1) and (a)(2) are amended to incorporate innovative aircraft (non-conventional helicopter and powered-lift) and other than piston or electric aircraft.

The intent is to ensure that, when innovative aircraft do come under a Part CAO, there are requirements ensuring that they will be accounted for in the Part CAO requirements.

Therefore, point (a)(1) is accounting for innovative aircraft not currently considered within the rule.

Note that:

'Not ELA2 means that aircraft are not the following:

UK Reg (EU) 1321/2014 point (Ka)

'ELA2 aircraft' means the following manned European Light Aircraft:

- (i) an aeroplane with a Maximum Take-off Mass (MTOM) of 2000 kg or less that is not classified as complex motor-powered aircraft;
- (ii) a sailplane or powered sailplane of 2000 kg MTOM or less;
- (iii) a balloon;
- (iv) a hot air ship;
- (v) a gas airship complying with all of the following characteristics: — 3 % maximum static heaviness, — non-vectorized thrust (except reverse thrust), — conventional and simple design of structure, control system and ballonet system, and — non-power assisted controls;
- (vi) a Very Light Rotorcraft;

For point (a)(2) this specifically accounts for other than piston or electric, these may be turbines, hybrid turbines or future technology not yet specified.

For point (a)(3), please see the below table explaining how the new points cover the previous points and have been amended to incorporate electric powerplant.

<b>Previous point (3) covered:</b>	<b>New point (3) covers:</b>
(a) Turbine aeroplane (aircraft rated org)	retained in point (a).
(b) Turbine helicopter (or multiple piston engines).	Now included under point (a).
(c) >450 hp piston engines	Retained in point (c). Amended to incorporate electric power plant.
(d) Turbine engines (engine rated org)	Included in point (c).

Point (4) is amended to include 'C23 other'.

## CAO.A.105 Changes to the organisation

(a) In order to enable the CAA to determine continued compliance with this Annex, the CAO must notify it of any proposal to carry out any of the following changes, before such changes take place:

- (1) changes affecting the information contained in the approval certificate laid down in Appendix I and the terms of approval of this Annex;
- (2) changes of the persons referred to in points CAO.A.035(a) and (b);
- (3) changes in the aircraft types covered by the scope of work referred to in point (a)(1) of point CAO.A.020 in the case of aeroplanes of more than 2730 kg maximum take-off mass (MTOM), ~~and in the case of~~ helicopters of more than 1200 kg MTOM or certified for more than 4 occupants and for any other aircraft which is not an ELA2;
- (4) changes in the scope of work referred to in point (a)(2) of CAO.A.020 in the case of complete turbine engines ~~other than~~ piston or electric;
- (5) changes in the control procedure set out in point (b) of this point.

(b) Any other changes in locations, facilities, equipment, tools, material, procedures, scope of work and staff ~~must~~ shall be controlled by the CAO through a control procedure provided for in the CAE. The CAO ~~must~~ shall submit a description of those changes and the corresponding CAE amendments to the CAA within 15 days from the day on which the change took place.

### 0201.88 – Intent of proposed changes – CAO.A.105

Amended to account for electric powerplant and innovative aircraft such as non-conventional helicopter and powered-lift.

## Appendix I — Combined airworthiness organisation (CAO) certificate — CAA Form 3-CAO

(a) Within the approval class(es) and rating(s) established by the CAA, the scope of work specified in the CAE defines the exact limits of approval. It is therefore essential that the approval class(es) and rating(s) and the organisations scope of work are matching.

(b) An aircraft rating, in relation to the maintenance privileges, means that the CAO may carry out maintenance on the aircraft and any component (including engines), in accordance with aircraft maintenance data or, if agreed by the CAA, in accordance with component maintenance data, only whilst such components are fitted to the aircraft. Nevertheless, such aircraft-rated CAO may temporarily remove a component for maintenance in order to improve access to that component except when such removal creates the need for additional maintenance not eligible for the requirements of point (b). This will be subject to a control procedure in the CAE to be approved by the CAA.

(c) An engine rating (turbine, piston or electrical) means that the CAO may carry out maintenance on the uninstalled engine and engine components, in accordance with engine maintenance data or, if agreed by the CAA, in accordance with component maintenance data, only whilst such components are fitted to the engine. Nevertheless, such engine-rated CAO may temporarily remove a component for maintenance in order to improve access to that component except when such removal creates the need for additional maintenance not eligible for the requirements of point (c). An engine-rated CAO may also carry out maintenance on an installed engine during base and line maintenance subject to a control procedure in the CAE to be approved by the CAA.

(d) A component rating (other-than-complete engines) means that the CAO may carry out maintenance on uninstalled components (excluding complete engines) intended for fitment to the aircraft or engine. This CAO may also carry out maintenance on an installed component (other-than-complete engines) during base and line maintenance or at an engine maintenance facility subject to a control procedure in the CAE to be approved by the CAA.

(e) A non-destructive testing (NDT) rating is a self-contained rating not necessarily related to a specific aircraft, engine or other component. The NDT rating is only necessary for a CAO that carries out NDT as a particular task for another organisation. A CAO approved with an aircraft, engine or component rating may carry out NDT on products they are maintaining subject to the CAE containing NDT procedures, without the need for an NDT rating.

Page 1 of 3

**Civil Aviation Authority**

of the

**United Kingdom**

**COMBINED AIRWORTHINESS ORGANISATION CERTIFICATE**

REFERENCE: UK.CAO.

Pursuant to **UK** Regulation (EU) 2018/1139 of the European Parliament and of the Council and to **UK** Regulation (EU) No 1321/2014 and subject to the conditions specified below, the Civil Aviation Authority of the United Kingdom hereby certifies:

[Company name and address]

as a combined airworthiness organisation in compliance with Section A of Annex Vd (Part-CAO) to **UK** Regulation (EU) No. 1321/2014.

**CONDITIONS**

(a) this approval is limited to that specified in the approval schedule attached, and in the 'Scope of work' Section of the approved combined airworthiness exposition, as referred to in Section A of Annex Vd (Part-CAO) to **UK** Regulation (EU) No. 1321/2014; and

(b) this approval requires compliance with the procedures specified in the approved combined airworthiness exposition; and

(c) this approval is valid whilst the approved combined airworthiness organisation remains in compliance with Annex Vd (Part-CAO) to UK Regulation (EU) No 1321/2014; and

(d) where the approved combined airworthiness organisation contracts out, under their quality system, the service of one or several organisations, this approval remains valid subject to such organisation(s) fulfilling applicable contractual obligations; and

(e) subject to compliance with the foregoing conditions, this approval ~~must~~ shall remain valid for an unlimited duration unless the approval has previously been surrendered, superseded, suspended or revoked.

Date of original issue of the approval certificate:

Date of this revision of the approval certificate:

Revision No:

Signed:

For the Civil Aviation Authority

CAA Form 3-CAO, Issue 42

Page 2 of 3

## COMBINED AIRWORTHINESS ORGANISATION TERMS OF APPROVAL

REFERENCE: UK.CAO.[XXXX]

ORGANISATION: [Company name and Address]

CLASS	RATING	PRIVILEGES
<b>AIRCRAFT</b>	Aeroplanes – other than complex motor-powered aircraft	<input type="checkbox"/> Maintenance <input type="checkbox"/> Continuing airworthiness management <input type="checkbox"/> Airworthiness review <input type="checkbox"/> Permit to fly
	Aeroplanes up to 2730 kg maximum take-off mass (MTOM)	<input type="checkbox"/> Maintenance <input type="checkbox"/> Continuing airworthiness management <input type="checkbox"/> Airworthiness review <input type="checkbox"/> Permit to fly
	Helicopters – other than complex motor-powered aircraft	<input type="checkbox"/> Maintenance <input type="checkbox"/> Continuing airworthiness management <input type="checkbox"/> Airworthiness review <input type="checkbox"/> Permit to fly
	Helicopters up to 1200 kg (MTOM) certified for a maximum of up to 4 occupants	<input type="checkbox"/> Maintenance <input type="checkbox"/> Continuing airworthiness management <input type="checkbox"/> Airworthiness review <input type="checkbox"/> Permit to fly
	Airships	<input type="checkbox"/> Maintenance <input type="checkbox"/> Continuing airworthiness management <input type="checkbox"/> Airworthiness review <input type="checkbox"/> Permit to fly
	Balloons	<input type="checkbox"/> Maintenance <input type="checkbox"/> Continuing airworthiness management

		<input type="checkbox"/> Airworthiness review <input type="checkbox"/> Permit to fly
	Sailplanes	<input type="checkbox"/> Maintenance <input type="checkbox"/> Continuing airworthiness management <input type="checkbox"/> Airworthiness review <input type="checkbox"/> Permit to fly
	Other Aircraft	<input type="checkbox"/> Maintenance <input type="checkbox"/> Continuing airworthiness management <input type="checkbox"/> Airworthiness review <input type="checkbox"/> Permit to fly

CAA Form 3-CAO, Issue 42

Page 3 of 3

## COMBINED AIRWORTHINESS ORGANISATION TERMS OF APPROVAL

REFERENCE: UK.CAO.[XXXX]

ORGANISATION: [Company Name and Address]

CLASS	RATING	PRIVILEGES (*)
COMPONENTS	Complete turbine engines	<input type="checkbox"/> Maintenance
	Complete piston engines	
	Electrical engines	
	Other engines / powerplants	
	Components other than complete engines	
SPECIALISED SERVICES	Non-destructive testing (NDT)	<input type="checkbox"/> NDT Specify the particular NDT Methods

## LIMITATIONS

(to be included only for organisations rated for aeroplanes, helicopters or complete engines, if they only have one person planning and performing all maintenance tasks)

The following maintenance is excluded from the scope of work (\*):

- maintenance on aeroplanes equipped with a turbine engine;
- maintenance on helicopters equipped with a turbine engine or with more than one piston engine; and
- maintenance on complete piston engines of 450 HP and above, and on complete turbine engines.

## List of organisation(s) working under a quality system (\*)

This approval schedule is limited to the products, parts and appliances, and to the activities specified in the 'Scope of work' Section of the approved combined airworthiness exposition.

Combined airworthiness exposition reference:

Date of original issue of the exposition:

Date of last revision approved:

Revision No:

Signed:

For the Civil Aviation Authority

(\*) complete as appropriate

CAA Form 3-CAO, Issue 12

**0201.89 – Intent of proposed changes – Part CAO – Appendix I**

Form 3 is amended to account for electric powerplant.