

List of proposed amendments and intent of proposed changes to UK Regulation (EU) 1321/2014 Continuing Airworthiness

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

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Annex III - Part 66

0201.01 - Article 6 – Training Organisation requirements

0201.01 - Intent of proposed changes – Article 6

No specific wording is provided at this time however Article 6 is to be amended to provide clarity on the transition period allowing those conducting Basic Training on the old syllabus to still be able to apply for a licence.

It will also provide clarity of what regulation reference is required on the Certificates of Recognition (CofR) issued by Part 147's in order to be accepted. This is because the CofR format is proposed for amendment under this SI and therefore the CofR cannot refer to the later version of the regulation, if it is to be issued in the previous format during the transition period.

It will further provide guidance to the CAA on what can be accepted.

The current proposed timelines are:

- The Statutory Instrument (SI) will be made in 2027. Some elements will come into force within a few months. These elements will be those that are easily implemented or affect the CAA.
- For the majority of the SI, the coming into force date will be in 2029, 2 years following the date the SI is made.
- For courses that begin prior to the coming into force date in 2029, there will be a 4-year transition period enabling the CofR's issued following those courses to be accepted.

Any courses begun post the coming into force date of 2029 will need to be on the new syllabus.

0201.02 – 66.1 – CAA

0201.02 Intent of proposed changes - 66.1 - CAA

This proposed for addition to allow the CAA to categorise novel or new aircraft that do not sit within the (sub)category(ies) within Part 66. This is because amending the regulation to create new (sub)category(ies) and consequential module amendments for a minority of aircraft is not sustainable long term for the CAA or for industry. This is particularly so when the design of these aircraft is still in development.

0201.03 - 66.A.3 Licence categories and subcategories

0201.03 – Intent of proposed changes - 66.A.3 Licence categories and subcategories

In-line with 66.1 - this proposed for addition to allow the CAA to categorise novel or new aircraft that do not sit within the (sub)category(ies) within Part 66. This is because amending the regulation to create new (sub)category(ies) and consequential module amendments for a minority of aircraft is not sustainable long term for the CAA or for industry. This is particularly so when the design of these aircraft is still in development.

The intent is that the CAA will review each new design and will allocate a licence (sub)category for the licence based on the TCDS. This gives the flexibility in the rule to allow engineers to work on novel new aircraft. This amendment is aimed at new, electric, hybrid or hydrogen powerplants or Vertical Take-Off and Landing (VTOL) aircraft.

For electrically powered aircraft below MTOM below 5700kg, the B1.E licence is proposed. The modules and corresponding syllabus have been updated.

0201.04 - 66.A.5 – Aircraft Groups

0201.04 – Intent of proposed changes - 66.A.5 – Aircraft Groups

Groups and subgroups are proposed to be amended to allow for new or novel aircraft such as electric powerplant and VTOL aircraft. This includes Group 1 which is amended to incorporate novel aircraft and powerplants (such as VTOL or electric aircraft that do not come under Subgroup 2E) into Group 1.

In Point (2) there is the addition of subgroup 2E for electric aeroplanes. Note that in Subgroup 2E, the E stands for electric and is not a continuation of 2a, 2b and 2c.

Point (iv) is linked to the output of RMT 0158-002 Policy framework for new types of Vertical-Take Off and Landing (VTOL) aircraft which is out at consultation until 29th January 2026 and therefore this will be updated to reflect any amendments following that consultation.

Note – the dashes in point (2) '-' are deleted but the strike through does not show.

0201.05– 66.A.20 – Privileges

0201.05 Intent of proposed changes – 66.A.20 - Privileges

Point 7: Is amended to ensure other than complex aircraft are included on Category C aircraft maintenance licence which are issued with respect to complex motor-powered aircraft.

Point 8: This proposed for addition to allow the CAA to categorise novel or new aircraft that do not sit within the (sub)category(ies) within Part 66. This is because

amending the regulation to create new (sub)category(ies) and consequential module amendments for a minority of aircraft is not sustainable long term for the CAA or for industry. This is particularly so when the design of these aircraft is still in development.

The intent is that the CAA will review each new design and will allocate a licence (sub)category for the licence based on the TCDS. This gives the flexibility in the rule to allow engineers to work on novel new aircraft. This amendment is aimed at new, electric, hybrid or hydrogen powerplants or Vertical Take-Off and Landing (VTOL) aircraft.

0201.06– 66.A.25 - Basic knowledge requirements

0201.06 Intent of proposed changes – 66.A.25

Point (a) is amended to account for the amendments made to Appendix II and clarify that the examinations are to be done for the applicable category, including Category L licences.

Point (b) is amended to clarify that there are 3 types of organisations that can conduct Basic Examination, this is to add the ability for the CAA to approve non Part-147 organisation to conduct Category L licence examinations. This is because there are not always Part-147 organisations with the approval to conduct these examinations and this reduces the burden on the CAA.

Point (c) is deleted as the amendments to point (a) provide the clarification that the B2L ratings must demonstrate the required knowledge level through the modules required by Part 66. This supports amendments throughout Part 66 which introduce clear requirements of what modules are required for each category of licence.

Point (d) has become point (c) and includes and amends the 10 year validity requirements enabling point (f) to be deleted. It also provides clarification as to the validity of examinations conducted outside of the 10 year period whereby the licence for those examinations has already been issued.

Point (e) now (d) is amended to clarify that the credits are only for examinations passed 10 years prior to application.

A new point (e) is added to provide clarification of the requirements for modules 1 and 2 when they were not conducted as part of a basic training course but sat under a separate examination.

The new point (f) provides direction to Appendix I and VII which clarify the exams required for each licence and Appendix IV which clarifies any addition examinations required to move between licences. This is to support the proposed change within the module structure allowing for easier movement between licence categories and ratings.

0201.07 - 66.A.30 - Basic Experience Requirements

0201.07 Intent of proposed changes – 66.A.30

The last two paragraphs of point (a)(2b) are proposed to be deleted to remove the conditions for Category L licences as the knowledge and experience required to extend a licence (sub)category is proposed for addition to Appendix IV.

Points (a)(3), (a)(4) and (a)(5) are proposed to be amended to clarify conditions for Category C for CMPA and other than CMPA (with or without an academic path). Providing this clarity will help support industry in supporting those wishing to gain a Category C licence and understand the routes available to them. This includes amendments to include the B1.E category licence.

Point (da) is added for novel and new aircraft and technology, ensuring that if working on these aircraft, they can only account for up to 50% of the experience required. This ensures experience on traditional aircraft.

Proposed point (e) amendments provide a clarified condition for experience gained in civil maintenance environment, i.e. Part-145 and Part-CAO. The addition for 'unless otherwise accepted by the CAA' intends to enable the CAA to recognise the experience of people working on national aircraft such as military aircraft, so long as the maintenance experience has been assessed by the CAA as being equivalent.

0201.08 – 66.A.40 - Continued validity of the aircraft maintenance licence.

0201.08 Intent of proposed changes – 66.A.40

Part CAO added to point (b) to enable the consideration for organisations approved in accordance with Part-CAO for submission of applications for Part-66 licences.

Note that 66.A.40 is being further amended under RMT 0193 for the introduction of the Digital Personnel Licence.

0201.09– 66.A.45 - Endorsement with aircraft ratings

0201.09 Intent of proposed changes – 66.A.45

Point (c) is amended to account for new aircraft and powerplants as referenced in the proposed wording for 66.A.3(b). OJT is required only for the first type on a licence however, if the first type comes under 66.A.3(b), then if the applicant wishes to work on aircraft under 66.A.3(a), they will need to conduct further OJT. This ensures that the engineer has sufficient experience on traditional types of aircraft and powerplant.

In point (c) there is also the addition for the requirement for a first type training course to be conducted face to face. This is because, in a first type course where you have not undertaken this type of training before, the limitations of distance learning are not providing sufficient training and knowledge to engineers. The CAA has received whistle blower complaints with concerns over competency of new engineers and concerns that distance learning is not effective. Further this helps to address concerns raised by CAA findings from auditing some distance learning courses. It is difficult for students to interact with the instructors and each other and provides a challenge for the Part 147 to ensure that the training environment of the trainee is conducive to learning.

This has also been a concern raised to the CAA by industry in both the training and maintenance environments at seminars. The CAA currently holds a risk for remote sites and distance learning because distance learning is not as effective as face-to-face learning. When the CAA did the industry seminar and requested a vote on distance learning, most voted it as not as effective as face to face.

Point (d) is amended to replace the term 'type examination' with 'type evaluation'. This intends to reduce confusion with the type (training) examination.

Point (da) is added to give the CAA the ability to add ratings to licences where a new Type Certificate is approved and there is less likely to be a Part 147 training provider approved to conduct training on that type. The training instead can be delivered by the aircraft manufacturer.

Point (h)(ii)(3) the last paragraph is deleted because the knowledge and experience required to extend a licence (sub)category are now specified in Appendix IV.

0201.10 - 66.A.55 - Evidence of qualification (New title: Licence handling and reporting by the holder)

0201.10 - Intent of proposed changes – 66.A.55

For point (a), the addition for the identity document is because the requirement to produce identification was originally seen as incorporated in the Form 26. This form is proposed for removal under RMT 0193 and therefore the CAA still needs the ability to enforce the need to see ID with a physical licence. This is because the physical licence does not contain a photograph of the licence holder which the digital licence will hold.

Point (b) is proposed to ensure that stolen or lost physical licences are reported to the CAA. This helps the CAA track and monitor potential fraud cases.

Point (c) ensures that when physical licences need to be amended, for example a limitation applied or the licence revoked, the physical format is removed from circulation so that the invalid licence can no longer be used.

0201.11 -- 66.A.70 – Conversion Provisions

0201.11 – Intent of Proposed Changes - 66.A.70

When the CAA left EASA 66.A.70 Conversion Provisions was deleted from the regulation however, references to it throughout the regulation were not deleted and no legal premise was reintroduced to the rule to allow the CAA to convert BCAR licences to Part 66 licences, with the applicable limitations added.

As the limitations applied on conversion from BCAR are not the same as those available in the rule under 66.A.50 which are applied to Part 66 licences, the UK CAA are looking to reinstate the ability to add BCAR licence privileges to a Part 66 licence. In order to do this, the CAA needs the ability within the rule to do so and add the required limitations. These limitations are different to those under 66.A.50 because of the differences between training for a BCAR licence and a Part 66 licence. Further the references to 66.A.70 remain within the regulation and currently there is no rule that can be referenced in its place.

The proposed wording is based on the original 66.A.70 which was removed from the regulation.

0201.12 – 66.B.105 - Procedure for the issue of an aircraft maintenance licence via a maintenance organisation approved in accordance with Annex II (Part-145) (new title: Procedure for recommendation for an aircraft maintenance licence via a maintenance organisation approved in accordance with Annex II (Part-145) or Annex Vd (Part-CAO))

0201.12 – Intent of proposed changes – 66.B.105

The title is proposed for amendment to reflect the changes to the text in point (a). Point (a) is amended to clarify that only the CAA can prepare licences however, the CAA wishes to retain the ability for Part 145's (and extend this to Part-CAO's) to recommend an individual for a licence.

0201.13 – 66.B.110 - Procedure for the change of an aircraft maintenance licence to include an additional basic category or subcategory

0201.13 – Intent of proposed changes – 66.B.110

It is proposed to remove the conditions for B1.2 and B3 to obtain an L2 licence as the knowledge and experience required to extend a licence (sub)category are now specified in Appendix IV.

0201.14 – 66.B.120 - Procedure for the renewal of an aircraft maintenance licence validity

0201.14 – Intent of proposed changes 66.B.120

Point 66.A.120 has been amended to account for the electronic licence renewal. For physical licences the CAA records are compared with the returned physical licence. On the renewal of an electronic licence, the data on the licence application should be compared to the current licence and the information the CAA holds on the individual. The word 'limit' has been added to point (a) as this should have been incorporated here previously.

0201.15 – 66.B.130 – Direct Course Approval

0201.15 – Intent of proposed changes – 66.B.130

Point (c) is added to allow for the addition of a separate Certificate of Recognition (Form 149b) for type training approved for an organisation not approved in accordance with Part 147. These courses are conducted when there is not sufficient need for a Part 147 permanent approval and the course will be

conducted by an organisation holding a maintenance approval rather than a training approval. Note this is not the same as the EASA 148b which is also used for recognition of examinations by another competent state authority.

0201.16 – 66.B.135 - Procedure for the approval of multimedia-based training (MBT) courses

0201.16 – Intent of proposed changes – 66.B.135

The new point 66.B.135 'Procedure for the approval of multimedia-based training (MBT) courses' is proposed to be added.

This follows the introduction MBT to the training environment and requires the CAA to develop a procedure for the approval of MBT courses based on the new training methods and teaching technologies, conducted either in a physical, virtual or hybrid environment.

0201.17 - 66.B.200 - Examination by the CAA

0201.17 – Intent of Proposed Changes - 66.B.200

Point (g) amended to reflect that not all examinations are completed on paper but may be on a secure computer.

0201.18 – Subpart E - Examination Credits

0201.18 – Intent of proposed changes – Subpart E

Reference amended to reflect proposed changes to 66.A.25.

0201.19 – 66.B.405 - Examination credit report

0201.19 – Intent of proposed changes - 66.B.405

66.B.405 is amended to refer to 'must' instead of 'shall' to align with other Annexes. Point (a) is amended to provide clarity on the requirements of the comparison in the credit report.

0201.20 – 66.B.500 - Revocation, suspension or limitation of the aircraft maintenance licence

0201.20 – Intent of proposed changes – 66.B.500

Point 66.B.500(a)(9) is proposed to be added to require the CAA to act upon licences whose content has not been issued or amended by them (in such case, the wording remains generic and includes licences issued in electronic format, should they also be subject to such risks). The requirement to keep a licence in good condition, and not make unauthorised entries is included in point 8 to Appendix VI to Part 66.

Point 66.B.500(b) is proposed to be added to require the CAA to establish and implement a procedure for the revocation, suspension or limitation of valid aircraft maintenance licences issued in electronic format.

Point 66.B.500(c) is proposed to be added to require action by the CAA once the licence holder has reported the loss or theft of their current licence issued in physical format.

These amendments will mitigate the risk of a licence being used while it has been stolen, limited, suspended, or revoked.

Point 66.B.500(d) has been added to align with 66.B.120(b)(4) and ensure that the licence holder and employing maintenance organisation are aware of such changes to the licence.

0201.21 - Appendix I (Part 66) - Basic Knowledge Requirements (except for category L licence)

0201.21 – Intent of proposed changes - Appendix I to Part 66

Point 2

Wording is amended to reflect the new table layout.

The two tables are combined as well as the amendment to incorporate the B1.E

The module syllabus' have been changed to account for the following:

The module syllabus descriptions have been moved to AMC.

Some of the levels required for a category have been adjusted. This has been done for one of two reasons. Firstly, to account for a change to the module, for example a change in the technology and materials maintained by that licence subcategory. The most significant change has been the change in technology in light aircraft. Secondly, to allow for the easier movement between licence (sub)category(ies). This is the key reason for the combination of levels in the top of the tables, for example moving B3 to the same column as B1 in module 4.

MODULE 1. MATHEMATICS

B1, B2 and B3 have been merged because they are identical.

MODULE 2. PHYSICS

A has been upgraded to match the B3 level. B2 and B2L have been upgraded to match the B1 level.

MODULE 3. ELECTRICAL FUNDAMENTALS

B1 and B2 and B2L have been merged because they are identical. For Category A, 3.6 has been added.

MODULE 4. ELECTRONICS FUNDAMENTALS

Knowledge levels for B3 have been upgraded to match the B1 levels.

MODULE 5. DIGITAL TECHNIQUES/ELECTRONIC - INSTRUMENT SYSTEMS

Merged levels for B1.

MODULE 6. MATERIALS AND HARDWARE

Added: (c) Repair and inspection procedures. - B1 and B3 have been merged.

MODULE 7. MAINTENANCE PRACTICES

M7A and M7B have been merged. B3 has been upgraded to B1. This enables the conversion from a B3.

7.14.3 'Additive manufacturing' has been added.

7.15 has been removed as these skills are specialist and can be gained via separate qualifications.

7.21 'Documentation & communication': this new chapter is inserted to show compliance with 66.A.20(b)4.

MODULE 8. BASIC AERODYNAMICS

B3 has been upgraded to match the level of Category A. B1 and B2/B2L have been merged because they are identical.

8.4 High-speed airflow' has been added.

MODULE 9. HUMAN FACTORS

The title has been amended because there is no A/B version any longer.

B1, B2 and B3 have been merged because they are identical.

9.9 'Safety management' has been added (ref. NPA 2013-19).

9.10 'The "Dirty Dozen" and risk mitigation' has been added.

MODULE 10. AVIATION LEGISLATION

B1, B2, B2L and B3 have been merged because they are identical.

The following have been added:

10.4 'Independent certifying staff' has been added to increase awareness of scope and responsibilities of independent certifying staff.

10.8 Added to include 'Oversight principles in continuing airworthiness' has been added to increase awareness of the role of the regulator and its importance in the aviation system.

10.9 Amended to include 'Maintenance and certification beyond the current EU regulations (if not superseded by EU requirements)'

10.10 'Cybersecurity in aviation maintenance' is added to keep up to date with new methods of recording aircraft documentation and requires an understanding of the security required.

MODULE 11. TURBINE AEROPLANE AERODYNAMICS, STRUCTURES AND SYSTEM

Modules 11A/B/C have been merged.

Improved subdivision of the subjects.

ATA chapters added.

MODULE 12. HELICOPTER AERODYNAMICS, STRUCTURES AND SYSTEMS

ATA chapters added.

MODULE 13. AIRCRAFT AERODYNAMICS, STRUCTURES AND SYSTEMS

Improved subdivision of the subjects.

ATA chapters added.

MODULE 14. PROPULSION

Engines propulsion subjects added.

14.3 'Propeller systems' has been added.

MODULE 15. GAS TURBINE ENGINE

15.15 'Alternate turbine constructions' replaces 'Power Augmentation Systems'.

MODULE 16. PISTON ENGINE

B3 knowledge levels have been amended to match B1 knowledge levels.

16.14 'Alternative piston engine constructions' has been added.

MODULE 17. PROPELLER

M17A and 17B have been merged.

B3 knowledge levels have been amended to match B1 knowledge levels.

MODULE 18. ELECTRIC POWERPLANT is added.

Introduction of a new point 3. into Appendix I proposing different but appropriate training methods to be determined for each course or part thereof with regard to the scope and objectives of each training phase, taking into consideration the benefits and the limits of the available training methods.

0201.22 – Appendix II to Part 66 - Basic Examination Standard (except for category L licence)

0201.22 – Intent of proposed changes – Appendix II to Part 66.

Point 1

1.11 The incorrect term 'failed module' is replaced by 'failed examination' to ensure clarity between a failed module and failed examination.

1.12 Is amended to provide further clarity on the requirements of partial exams to provide clarity that, where basic knowledge examinations with a maximum allowed time of more than 90 or more than 180 minutes, these exams may be split in two or three partial exams. The change clarifies that when these exams are split, each partial exam is to meet the requirements as outlined in the proposed wording for point 1.12 (a) to (f).

1.13 amended to allow for a 12-month rolling period rather than a fixed 12 months between sets of 3. The text is improved/expanded to specify the conditions for splitting large modules and the interval between examination attempts.

New point 1.14 is added to ensure any questions used as part of the training course, including MBT, cannot be used for the exams.

Point 2.

The number of questions has been recalculated according to the amended modules in Appendix I. This has been done to reflect the changes to the module syllabus and the changes to enable easier movement between licence (sub)category(ies). This has resulted in time changes to account for the change of questions.

0201.23 – Appendix III to Part 66 — Aircraft type training and examination standard (new title: Aircraft type training and examination standard on-the-job training (OJT))

0201.23 – Intent of proposed changes - Appendix III to Part 66

The first line 'On the job training' is deleted as it is now covered by the main title.

The text has been improved to clarify the obligation with the OSD elements, when existing.

Point 1.(b) Amendment to replace 'other training devices' with 'maintenance simulation training devices (MSTDs)' and 'maintenance training devices (MTDs)'.

Point 1. (c)(i): the text has been changed to clarify the concept of the differences training.

Point 1. (c)(iv) has been added to clarify the validity period of the differences training.

Point 3 - Introduction of new text proposing different but appropriate training methods to be determined for each course, or part thereof, with regard to the scope and objectives of each training phase whilst taking into consideration the

benefits and the limits of the available training methods and allowing the use of MBT methods.

Point 3.1(a) The term 'approved maintenance data' has been replaced by 'maintenance data'.

The table under point 3.1(c) is amended to incorporate electronic powerplant and novel aircraft.

Amendment of point 3.1.(d) by replacing 'attendance' by 'physical and/or virtual classroom attendance' and 'hours of training' by 'hours of physical and/or virtual classroom training' in order to reflect the new training methods and tools.

Point 3.1(e) Text has been introduced to clarify the obligation to include the OSD elements, when existing.

3.1(e) – the table is amended to include electric powerplant modules for B1.E. Remaining modules either corrected or moved to account for the syllabus update to incorporate changing technologies in both current and innovative new aircraft.

3.1(e) - the table is amended so that Module 55/57 Flight control surfaces (All) has been moved under Airframe Systems.

3.1(e) - the table is amended so that the module for Nitrogen generation system has been added to Airframe systems.

Point 3.1(f) is deleted as a new Appendix IX is proposed for MBT.

In point 3.2(b), text has been introduced to clarify the obligation to include the OSD elements, when existing.

The table in 3.2(b) it amended in-line with the amendments proposed for the table in 3.1(e).

Amendment of point 4.1(f) to further detail the principle of determination of the minimum number of questions to be used for each chapter in the case of training methods that cannot be expressed in hours of instruction (student-centred, self-paced methods). The term 'Student-centred' means that the student is responsible for the learning progress'. What this term means is proposed to be outlined within AMC1 147.A.130(a). This is a commonly understood term for those using distance-synchronous learning, particularly in organisations holding a dual EASA and UK approval as the term is used in EASA regulation.

Addition of a new point 4.1(j) to prevent the questions used as part of the MBT learning programme from being used in course or phase examinations. This ensures that students are tested on their subject knowledge rather than memory of exam questions.

Point 4.1(k) is proposed to control the time frame between theory and examination. Traditionally, training was conducted in-person with examination conducted immediately following training on that module. Now that many schools teach theory remotely, individuals often conduct all the training online before coming to the school to sit all the exams prior to attending practical training. In some cases, it has been a year or more between training and examination. The CAA is aware that there are cases whereby refresher training has been conducted prior to examination focusing on the exam questions in the paper, meaning examination is no longer testing genuine understanding of the subject.

There are proposed amendments to Part 147 that intend to reduce exam fraud, such as examination security in the proposed new 147.A.135. This proposal supports the Part 147 amendments by ensuring that trainees sit examination within a reasonable timeframe following training. The proposed time frame is 90 days, except in exceptional circumstances as approved by the CAA. The intent is to outline examples of exceptional circumstances within the AMC.

The 90 days follows the same timeline as is currently allowed for exam resits. The CAA has noted that it is not feasible for individuals to travel weekly to sit exams immediately following each week of instruction, as was previously common, therefore the 90 days gives the trainee the opportunity to conduct several weeks of

distance learning prior to attending for an exam whilst preventing extreme gaps between training and examination.

Point 5

'Type examination' changed to 'type evaluation' to avoid confusion with the type training examination.

The standard for type evaluation for Group 2 and Group 3 aircraft has been amended.

Point 6 has been amended to add clearer requirements for OJT.

0201.24 – Appendix IV to Part 66 - Experience requirements for extending a Part-66 aircraft maintenance licence (new title: Experience and basic knowledge modules, or part modules required, for extending a Part-66 aircraft maintenance licence)

0201.24 – Intent of proposed changes - Appendix IV to Part 66

The title of the Appendix has been changed to include basic knowledge modules requirements.

The table A for the required experience has been expanded, to include L licences.

New point B has been included to provide an explanation of the new table B.

Table B is a new table for the required basic knowledge modules or part modules required for each category of licence. It also provides one clear table that enables engineers to easily understand what is required to move between licences.

0201.25 – Appendix VII to Part 66 - Basic knowledge requirements for category L aircraft maintenance licence

0201.25 – Intent of proposed changes - Appendix VII to Part 66

The table in Appendix VII Point 1 provides the requirements for each module for each licence.

The table for the basic knowledge modules applicable to L subcategories has been improved. The table has been merged with the table of contents. As with Appendix I to Part 66, there has been a correction and improvement of the syllabi content and the applicability of the modules has been changed.

The module syllabus' have been changed to account for the following:

Some of the levels required per category have been adjusted. This has been done for one of two reasons. Firstly, to account for a module change, for example a change in the technology and materials maintained by that licence subcategory. The most significant change has been the change in technology in light aircraft. Secondly, to allow for the easier movement between licence (sub)categories. This is the key reason for the combination of levels in the top of the tables, for example moving B3 to the same column as B1 in module 4.

The descriptive content of the basic knowledge modules is proposed to be moved to AMC level. Major elements of the syllabus (titles of paragraphs, subparagraphs, and knowledge levels) are retained in the regulation. The most significant change has been the change in technology in light aircraft. Secondly, to allow for the easier movement between licence (sub)categories. This is the key reason for the combination of levels in the top of the tables, for example moving B3 to the same column as B1 in module 4.

0201.26 - Appendix VIII to Part 66— Basic examination standard for category L aircraft maintenance licence

0201.26 – Intent of proposed changes - Appendix VIII — Basic examination standard for category L aircraft maintenance licence

Appendix VIII, point (b)

The number of questions have been recalculated according to the changes of the modules' content in Appendix VII.

0201.27 – Appendix IX to Part-66 - Assessment method for the multimedia-based training (MBT)'

0201.27 – Intent of proposed changes - Appendix IX to Part-66

The new Appendix IX 'Assessment method for the multimedia-based training (MBT)' is proposed.

In order to provide criteria on how to perform the assessment and the approval of MBT courses, the new Appendix IX to Part-66 is proposed to establish the principles for the assessment of any course that includes MBT, and to introduce the use of the assessment table for multimedia-based training (MBT). The assessment table is intended to serve as an objective tool to support the CAA in the approval process of training courses applying MBT methods.

Although it is mainly intended for the CAA, the assessment table may also be used by training device manufacturers and software developers in order to produce training devices and course software at a standardised suitability level to ensure that the courses using MBT tools meet the standard for approval by the CAA. Part-147 organisations may also benefit from this guidance when deciding which training devices or course software to procure.

Annex IV – Part 147

0201.28 – 147.A.05 Scope

0201.28 – Intent of proposed changes – 147.A.05

Amended for clarity and to account for the overall rule change moving from listing out training activities and examinations to come under one term 'training activities'.

0201.29 – 147.A.15 - Application

0201.29 – Intent of proposed changes – 147.A.15

147.A.15 is amended for clarity and to add principal place of business, as this may be different from the registered business address.

The introduction of points 6 and 7 to support the introduction of the management system to align with the safety management systems required of other Annexes.

‘Approval certificate’ is added to replace ‘approval’ in places where the rule is referring to the contents of the certificate itself. This aligns with amendments to the other Annexes.

0201.30 – 147.A.20 – Terms of approval and scope of work

0201.30 – Intent of proposed changes – 147.A.20

This new rule builds on from the application in 147.A.15 by introducing the concept of the Maintenance training organisation exposition (MTOE) required and the scope of work that will be included within it.

0201.31 – 147.A.25 – Subcontracting

0201.31 – Intent of proposed changes – 147.A.25

The intent of this proposed new rule is to eliminate or reduce examination cheating and fraud and conflict of interest within Part-147 organisations. This is intended to be achieved by ensuring that Part 147’s take on the responsibility of ensuring that subcontractors adhere to the training requirements by maintaining a level of oversight of the work performed.

0201.32 – 147.A.100 – Facility requirements

0201.32 – Intent of proposed changes – 147.A.100

Point (a) and (b) have some small corrections to keep consistency with the changes to terminology throughout Part 147 and Part 66. This includes moving towards the use of ‘theoretical training element’ rather than ‘theory’.

Point (f) is amended to align with the move from supervisor to instructor.

Point (h) is amended by removing ‘papers’ to account for exams delivered digitally rather than on physical paper.

The new sentence at the end of point (h) is proposed in consultation with cyber security to ensure that the exam database is protected for security breaches. This is a further requirement to GDPR as this considers the database of questions and exam papers prior to completion of an exam which would not come under GDPR requirements.

The introduction of a new point (j) is to exempt the training organisation from complying with the requirements in points (a), (d) and (f) of 147.A.100 in the case of distance learning, as these requirements are intended for the instructions performed at the training facilities and do not apply to distance learning where the training organisation has no control over the environment in which the student is located during the training. The exemptions provided are only

applicable to the training and must not be applied to the examination and the assessment. Prior to commencing any distance learning course, the training organisation is required to brief the student and raise their awareness about the suitability of their learning location.

0201.33 – 147.A.105 – Personnel Requirements

0201.33 – Intent of proposed changes – 147.A.105

147.A.105 is proposed to be updated to introduce some of the requirements of the management system for the MTO to clearly identify the lines of responsibility and duty within the organisation, as well as to identify and define the main processes to be described by the organisation. This management system is similar to the management systems referred to in other Annexes with the exception of the safety risk management component.

The proposed new points (i)-(l) introduce requirements for organisations to ensure the qualification and responsibilities of the organisation's personnel, including competence assessment and language requirements, and amendments to initial and recurrent training requirements for personnel.

This is a result of the increasing awareness of fraud and cheating within MTO's, notably in examinations.

This issue was raised by EASA in NPA 2023-10 as per the below, the survey conducted by EASA was done in 2016 when the UK was still part of EASA:

A survey on the maintenance licensing and training system, launched by EASA at the end of 2016, highlighted shortcomings and areas of improvement for Annex IV (Part-147) to Commission Regulation (EU) No 1321/2014. The assessment of this survey led to an evaluation report issued in 2018.

The issues identified through the survey and that are addressed by the proposal in this NPA are:

(a) Impact on safety and the credibility of the maintenance training system due to fraud cases and, in some cases, cultural acceptance of cheating. The general feedback received by EASA indicates that most of the fraud cases reported occur in the examinations that are performed by MTOs outside their approved locations in general, and in particular when the examinations are performed outside the territory for which their authority is competent, which includes EU Member States, but also third countries. While it is very difficult to evaluate the real extent of the problem and to confirm the fraud cases themselves, the frequency of the feedback suggests that such occurrences are more than just isolated cases. In the notable case of fraud at the Hellenic Aviation Training Academy (HATA) MTO, Commission Decision (EU) 2016/23577 withdrew certain certificates of recognition (CofR) issued by this MTO, as well as the aircraft maintenance licences based upon these, leading also to the revocation of the MTO's approval (see 'related safety issue' below). This case is a noticeable example of the need for regulatory action to combat fraud.

(b) Requirement for an adequate level of knowledge of the language in which the training is delivered.

The new 147.A.105(l) replaces current wording for 147.A.110 to bring the personnel requirements under one rule.

0201.34 – 147.A.110 – Records of Instructors, examiners and assessors (new title: Management system)

0201.34 – Intent of proposed changes – 147.A.110

New 147.A.105(l) replaces current wording for 147.A.110(a) and (b).

The new wording for 147.A.110 is proposed to introduce some of the requirements of the management system for the MTO to clearly identify lines of responsibilities and duties within the organisation, as well as to identify and define the main processes to be described by the organisation. This management system is similar to the management systems referred to in other Annexes with the exception of the safety risk management component.

This is a result of the increasing awareness of fraud and cheating within MTO's, notably in examinations. This issue was raised by EASA, see the intent of proposed changes for 147.A.105 for more information.

0201.35 – 147.A.115 – Instructional equipment

0201.35 – Intent of proposed changes – 147.A.115

The new paragraph in point (a) introduces requirements for the design of the training content in a virtual training environment regarding content being understandable, in addition to the existing provision for classroom presentation equipment.

Furthermore, 'synthetic training devices' is replaced in point (a) by 'maintenance simulation training devices (MSTDs) to remain up to date with ICAO and industry terminology.

0201.36 – 147.A.120 – Maintenance training material (new title: Training material)

0201.36 – Intent of proposed changes – 147.A.120

The new point (a)(3) is added to ensure practical training materials are available. This will ensure that the lesson is sufficiently planned for, and that suitable training material is provided relevant to the aircraft being trained on.

The introduction of a new point (c) in 147.A.120 'Maintenance training material' allows Part-147 organisations to provide the training material to the students in any medium.

In the case of electronic media, the student must have the appropriate means of accessing such material during the course duration at any given time. This may be ensured by the Part 147 organisation either providing the means of accessing the material or providing to the student the minimum hardware and software specifications required for such access at any given time during the entire course duration.

0201.37 – 147.A.125 – Records (new title: Record keeping)

0201.37 – Intent of proposed changes – 147.A.125

147.A.125 Records has been amended to 'Record keeping'. The new wording for this rule is to and align terminology and management processes with the other Annexes to the Continuing Airworthiness Regulation.

The introduction of management system requirements for the MTO aim to ensure clarity of the lines of responsibility and duty within an organisation, as well as to identify and define the main processes to be described by the organisation. Such management system is similar to the management systems referred to in other Annexes with the exception of the safety risk management component.

The intention of the amendments for the retention of training, personnel and management system records is to enable the CAA to detect fraudulent Certificate of Recognition certificates and to support investigations.

Point (a)(1)(v) intends to enable the CAA to review applications against course data to confirm that the Certificate of Recognition (CofR) submitted is valid. This will reduce the likelihood of anyone gaining a licence or rating based off a fake CofR.

Provisions are also added regarding the access and security of record-keeping systems. This is to ensure that records of attendance, grades, exam databases, training syllabus' are secure but remain accessible to the organisation.

0201.38 – 147.A.130 – Training procedures and quality system (new title: Training procedures)

0201.38 – Intent of proposed changes – 147.A.130

The introduction of management system requirements for the MTO aim to ensure clarity of the lines of responsibility and duty within an organisation, as well as to identify and define the main processes to be described by the organisation. Such management system is similar to the management systems referred to in other Annexes with the exception of the safety risk management component.

The new points 1-3 intend to bring in key elements of the management system such as auditable and clear contracts between the organisation and customer as well as other facilities used. The wording 'as relevant to the training type' is to ensure that the organisation used is appropriate to the type of training being facilitated.

Reference to the quality system have been removed, including auditing, which now comes under the management system under 147.A.110 Management System. This is to align with the other Annexes for introducing the management system to airworthiness organisations.

0201.39 – 147.A. 132 Performance of training activities

0201.39 – Intent of proposed changes – 147.A.132

The introduction of management system requirements for the MTO aims to ensure clarity of the lines of responsibility and duty within an organisation, as well as to identify and define the main processes to be described by the organisation. This management system is similar to the safety management systems referred to in other Annexes, with the exception of the safety risk management component.

The new 147.A.132 clarifies the requirements for the MTO to define their processes and to outlines clearly the requirements for the performance of training activities from a management system perspective.

The below are required to ensure that the organisation can demonstrate that it is set up to perform the scope of work held on their approval:

- The responsibilities held by the organisation to perform within their scope of work.
- That the MTO has the necessary procedures which are then adhered to in order to achieve their scope of work.
- That the MTO ensures that participants have the sufficient language proficiency to understand the training. This is an increasing challenge faced by distance learning courses and needs to be addressed to ensure they are meeting the necessary standard to receive a CofR.
- Training activity requirements, Theoretical examination requirements, Practical training requirements and Practical assessment requirements are all outlined within procedures.

0201.40 – 147.A. 135 Examinations (new title: Examination process)

0201.40 – Intent of proposed changes – 147.A.135

The title is amended from 'Examinations' to Examination Process'.

The changes to this rule are to reflect the introduction of the management system including reporting procedures and to provide greater clarity on requirements for examination. This intends to reduce cheating and examination fraud and ensures that engineers have sufficient understanding to hold their licence or ratings. There is also an increase in the time an individual caught cheating is not able to conduct any examinations.

Point (c) is introduced to ensure that the organisation develops sufficient procedures and processes to conduct examinations. This is to reduce examination fraud. This includes outlining clear responsibilities of the examiner, identity checks

and a declaration by the examinee that they understand their own rights, responsibilities and obligations when taking the exam.

Points (d), (e) and (f) are added to ensure that there is sufficient oversight of examinations in locations other than those in the exposition and approval certificate. That is because those within the exposition and approval certificate will have had CAA oversight, and the standard of the location must be assured to the same level. As the CAA is unable to resource someone to supervise examinations at all remote sites, this will be completed by a nominated person who has been previously approved by the CAA. This could be achieved in the exposition itself and the process for this will be outlined within AMC and GM.

The intent of point (f) is to ensure that the instructor and examiner cannot give any training specific to the exam questions chosen for that examination.

There will be AMC to point (f) explaining what systems of distribution meet this requirement such as printed exams in secure envelopes or if delivered digitally, by a secure electronic system.

0201.41 – 147.A. 140 Maintenance training organisation exposition (new title: Maintenance training organisation exposition (MTOE))

0201.41 – Intent of proposed changes – 147.A.140

The introduction of management system requirements for the MTO aims to ensure clarity of the lines of responsibility and duty within an organisation, as well as to identify and define the main processes to be described by the organisation in the MTOE. This management system is similar to the management systems referred to in other Annexes with the exception of the safety risk management component.

To achieve this, the requirements for the MTOE requires updating to align with the new management system requirements.

0201.42 – 147.A.145 Privileges of the maintenance training organisation

0201.42 – Intent of proposed changes – 147.A.145

The introduction of management system requirements for the MTO aims to ensure clarity of the lines of responsibility and duty within an organisation, as well as to identify and define the main processes to be described by the organisation. This management system is similar to the management systems referred to in other Annexes with the exception of the safety risk management component.

The new wording for 147.A.145 brings in wording to incorporate the management system and align with other Annexes of this rule.

0201.43 – 147.A.150 Changes to the maintenance training organisation

0201.43 – Intent of proposed changes – 147.A.150

The introduction of management system requirements for the MTO aims to ensure clarity of the lines of responsibility and duty within an organisation, as well as to identify and define the main processes to be described by the organisation. This management system is similar to the management systems referred to in other Annexes with the exception of the safety risk management component.

The new text for 147.A.150 brings in wording to incorporate the management system and align with other Annexes of this rule. It also provides greater clarity on when an organisation needs to gain prior approval of changes by the CAA.

0201.44 – 147.A.155 Continued Validity

0201.44 – Intent of proposed changes – 147.A.155

The proposed changes to 147.A.155 Continued Validity provides updated references to the regulation and includes the requirement for an organisation to act on findings to continue the validity of their approval.

0201.45 – 147.A.160 Findings

0201.45 – Intent of proposed changes – 147.A.160

The amendments to 147.A.160 provide clarity on the requirements on an organisation following notification of findings. The findings levels are moved to Section B - CAA requirements under 147.B.350 - Findings and corrective actions; observations. They are moved here because the level of finding is issued by the CAA.

0201.46 – 147.A.170 Access

0201.46 – Intent of proposed changes – 147.A.170

147.A.170 is added to build on 147.A.155(b). To ensure an organisation can maintain continued validity of an approval, the organisation must ensure access is granted to surveyors to conduct audits.

0201.47 – 147.A.200 - The approved basic course (new title: Basic training)

0201.47 – Intent of proposed changes – 147.A.200

147.A.200 is amended to correct references and align with the changes proposed across Part 147 and Part 66.

It provides clarification on elements that have been highlighted in audits such as point (e) which clarifies the important requirement for practical training to be conducted in an actual maintenance working environment.

Due to the restructure of modules enabling easier conversion from one licence (sub)category to another in Part 66, point (h) has been added to clarify the requirements on the Part 147 organisation to support this.

0201.48 – 147.A.205 Basic knowledge examinations (new title: Basic knowledge theoretical examinations)

0201.48 – Intent of proposed changes – 147.A.205

147.A.205 is amended to correct references.

0201.49 – 147.A.210 - Basic practical assessment (new title: Basic knowledge practical assessment)

0201.49 – Intent of proposed changes – 147.A.210

147.A.210 is amended to correct references and to incorporate management system MTOE requirements which aligns with other annexes.

0201.50 – 147.A.300 – Aircraft Type / Task Training (new title: Aircraft type training)

0201.50 – Intent of proposed changes – 147.A.300

The changes to 147.A.300 incorporates the management system and the consequential requirements of the MTOE.

0201.51 – 147.A.305 – Aircraft type examinations and task assessments

0201.51– Intent of proposed changes – 147.A.305

Deleted as replaced in 147.A.400 and 147.A.500.

0201.52 – Subpart E – Aircraft Type Evaluation

0201.52 – Intent of proposed changes – Subpart E

New Subpart E for Aircraft Type Evaluation to incorporate new 147.A.400 and make space for type evaluation specific points.

0201.53 – 147.A.400 – Aircraft Type Evaluation

0201.53 – Intent of proposed changes – 147.A.400

This new rule replaces 147.A.305 and provides clearer requirements for aircraft type evaluation such as the requirement to gain approval of the evaluation via the MTOE and how the evaluation and practical assessments are to be developed. This ensures sufficient oversight and organisational processes for the development of these courses.

This new rule gives a rule for new AMC and GM to be linked to for Aircraft Type Evaluation, giving the CAA a greater opportunity to provide clearer guidance for organisations.

0201.54 – Subpart F – Aircraft Task Training

0201.54 – Intent of proposed changes – Subpart F

New Subpart F for Aircraft Type Evaluation to provide a location specifically for Aircraft Task Training and 147.A.500.

0201.55 – 147.A.500 - Aircraft Task Training

0201.55 – Intent of proposed changes – 147.A.500

147.A.500 is replacing 147.A.305 for Aircraft Task Training to provide requirements for the content of the training and including relevant references. This gives a rule for new AMC and GM to be linked specifically to for Aircraft Task Training, giving the CAA a greater opportunity to provide clearer guidance for organisations.

0201.56 – Section B - Procedures for the CAA (new title CAA Requirements)

0201.56 – Intent of proposed changes – Section B Title

Section B title is amended to CAA requirements' to align with other annexes. The new numbering of the rules below enable Part 147 to align with other annexes such as Part 145.

0201.57 – Subpart A - General

0201.57 – Intent of proposed changes – Section B Subpart A

Subpart A deleted as new Section B drafted below.

0201.58 – 147.B.05 - Scope**0201.58 – Intent of proposed changes – 147.B.05**

Correction as Section B is not solely administrative requirements.

0201.59 – 147.B.10 - CAA**0201.59 – Intent of proposed changes – 147.B.10**

Deleting as now included in the proposed 147.B.200.

0201.60 – 147.B.20 – Record Keeping**0201.60 – Intent of proposed changes – 147.B.20**

Deleting as now included in the proposed 147.B.220.

0201.61 – 147.B.25 – Record Keeping**0201.61 – Intent of proposed changes – 147.B.25**

Deleting as the provision is not used.

0201.62 – Subpart B – Issue of an Approval**0201.62 – Intent of proposed changes – Subpart B**

Proposed to be deleted due to removal of 147.B.110. The contents are now covered in 147.B.310 and 147.B.330.

0201.63 – 147.B.110 Procedure for approval and changes to the approval

0201.63 – Intent of proposed changes – 147.B.110

Deleting as now included in the proposed 147.B.310 and 147.B.330.

0201.64 – 147.B.115 Oversight Documentation

0201.64 – Intent of proposed changes – 147.B.115

Provides the overall requirements for the CAA under Part 147 to ensure the support of Part 147 organisations so that they can discharge their responsibilities. This wording aligns with Annex II Part 145 - 145.B.115 and Annex Vc Part CAMO - CAMO.B.115.

0201.65 – 147.B.120 – Continued Validity Procedure

0201.65 – Intent of proposed changes – 147.B.120

147.B.120 is being deleted as the wording of this rule is now covered by 147.B.305.

0201.66 – 147.B.125 Maintenance Training organisation approval certificate

0201.66 – Intent of proposed changes – 147.B.125

Deleting as now covered in 147.B.310(e)(1).

0201.66 – 147.B.130 – Findings

0201.66 – Intent of proposed changes – 147.B.130

147.B.130 is proposed to be deleted as it is now covered in 147.B.350.
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0201.67 – 147.B.135 – Immediate reaction to a safety problem

0201.67 – Intent of proposed changes – 147.B.135

147.B.135 is introduced to align with other Annexes such as 145.B.135.
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0201.68 – Subpart C - Revocation, Suspension and Limitation of the Maintenance Training Organisation Approval

0201.68 – Intent of proposed changes – Subpart C

Deleted as 147.B.200 is now proposed to cover the management system.
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0201.69 – 147.B.200 - Revocation, suspension and limitation of the maintenance training organisation approval (new title: management system)

0201.69 – Intent of proposed changes – 147.B.200

Title change to 'Management System'.

Current wording deleted as is now covered in 147.B.355.

The new wording supports the introduction of oversight of the management system in order to align with other Annexes.

0201.70 – 147.B.210 – Changes in the management system

0201.70 – Intent of proposed changes – 147.B.210

This new rule is proposed to provide for review of the CAA's own management system to ensure that it meets its responsibilities as required by the UK Regulation (EU) 2018/1139 Basic Regulation.

0201.71 – 147.B.220 – Record Keeping

0201.71 – Intent of proposed changes – 147.B.220

This proposed new rule incorporated the previous 147.B.20. It incorporates elements of the CAA management system and expands on the minimum requirements for record keeping.

0201.72 – 147.B.300 Oversight Principles

0201.72 – Intent of proposed changes – 147.B.300

This proposed new rule is introduced to align Part 147 with the other annexes such as 145.B.300 Oversight Principles.

0201.73 – 147.B.305 Oversight Programme

0201.73 – Intent of proposed changes – 147.B.305

This proposed new rule is introduced to align Part 147 with the other annexes such as 145.B.305 Oversight Programme. This includes outlining the length of an oversight cycle and how the CAA can lengthen or shorten that cycle.

0201.74 – 147.B.310 – Initial Certification Procedure

0201.74 – Intent of proposed changes – 147.B.310

This proposed new rule is introduced to align Part 147 with the other annexes such as 145.B.310 Initial Approval Procedure. It provides the requirements on the CAA for the process of issuing an initial approval.

0201.75 – 147.B.330 Changes - Organisations

0201.75 – Intent of proposed changes – 147.B.330

This proposed new rule is introduced to align Part 147 with the other annexes such as 145.B.330.

This rule provides greater clarity between changes requiring and not requiring prior approval.

0201.76 – 147.B. 350 Findings and corrective actions; observations

0201.76 – Intent of proposed changes – 147.B.350

This proposed new rule is introduced to align Part 147 with the other annexes such as 145.B.350.

This rule provides greater clarity of the levels of findings, as removed from 147.B.130.

0201.77 – 147.B. 355 Suspension, limitation and revocation

0201.77 – Intent of proposed changes – 147.B.355

This proposed new rule is introduced to align Part 147 with the other annexes such as 145.B.355.

This rule provides the requirements on the CAA for the suspension, limitation and revocation of approvals.

0201.78 – Appendix I – Appendix I – Basic training course duration (new title: Appendix I to Annex IV – 147.A.200 – Basic training)

0201.78– Intent of proposed changes – Part 147 - Appendix I

Appendix I title is amended to 'Appendix I to Annex IV – 147.A.200 Basic Training' to align with other annexes and to clearly refer to 147.A.200.

Appendix I is updated to include the B1.E category.

0201.79 – Appendix II – Maintenance Training Organisational Approval – CAA Form 11 (new title: Appendix II to Annex IV – 147.B.310 Initial approval procedure)

0201.79 – Intent of proposed changes – Part 147 - Appendix II

Appendix II title is amended to 'Appendix II to Annex IV – 147.B.310 Initial Certification Procedure' to align with other annexes and the amendment to 147.B.310 title.

The CAA Form 11 is updated to include the B1.E category.

0201.80 – Appendix III – Certificates of Recognition referred to in Annex IV (Part-147) — CAA Forms 148 and 149 (new title: Appendix III to Annex IV – 147.A.145 Privileges of the organisation)

0201.80 – Intent of proposed changes – Part 147 - Appendix III

The title of Appendix III is amended to 'Appendix III to Annex IV – 147.A.145 Privileges of the organisation' to align with other annexes and amendments to Part 147. This provides a clear link to the amended 147.A.145.

The requirements regarding the persons identity on the certificates intends to reduce fraud, replication or modification of course certificates by making the certificate more specific to the individual and the course conducted.

The forms are amended to reflect the changes made to Part 147.

Forms 148b 149b are added for CAA issued CofR's.

0201.81 – Appendix IV – Certificates of Recognition referred to in Annex IV (Part-147) — 147.A.20 Terms of approval and scope of work Class and rating system for the terms of approval of Part 147 maintenance training organisations

0201.81 – Intent of proposed changes – Part 147 - Appendix IV

Appendix IV is added to provide the requirements for completing the CAA Form 11.

0201.82 – Annex I – Part M -Appendix VII – Complex Maintenance Tasks

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.

0201.83 – Annex II - 145.A.30 Personnel Requirements

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.

0201.84 – Annex II - Part 145 – Appendix II

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.

0201.85 – Annex Vb - Part ML – ML.A.302 Aircraft maintenance programme

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).

0201.86 – Annex Vb - Part ML – Appendix III Complex maintenance tasks not to be released by the pilot-owner

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.

0201.87 – Annex Vd – Part CAO – CAO.A.020 - Terms of approval

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-vector 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.

Previous point (3) covered:	New point (3) covers:
(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'.

0201.88 – Annex Vd – Part CAO – CAO.A.105 Changes to the organisation

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.

0201.89 – Appendix I — Combined airworthiness organisation (CAO) certificate — CAA Form 3-CAO

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

Form 3 is amended to account for electric powerplant.

