

Implementation of EASA Part M Light (only applicable to EASA aircraft)

From 24th March 2020

EASA Part M Light (or Part ML) regulation found here <https://www.easa.europa.eu/document-library/general-publications/erules-consolidated-regulation-eu-no-13212014-continuing>

EASA AMC guidance found here <https://www.easa.europa.eu/document-library/acceptable-means-of-compliance-and-guidance-materials/amc-and-gm-part-ml—issue-1>

On 24th March 2020, Part M Light comes into force. This brings changes to procedures in the BGA CAMO. Some of them apply from 24th March 2020 and some of them later in 2020. There are no exemptions allowed. This document aims to help owners and inspectors to comply with Part M Light.

Part M light only applies to EASA aircraft below 2730 kg (all BGA EASA aircraft are below 1200kg)

Part M light is generally a positive document as all the regulation involving aircraft above 2730kg has been removed. As a result, we are no longer tied to rules that are appropriate for maintaining a commercially operated Airbus/Boeing when we only maintain non-commercially used ELA 1 sailplanes and tugs. There are several changes that generally reduce the regulatory burden as well as reduce CAA oversight. But not all the changes are welcome, for example losing the ability to anticipate annual maintenance by up to 90 days without loss (does not apply to the ARC anticipation).

Owners responsibilities - EASA Aircraft

Part ML formally gives the owner legal responsibilities for the airworthiness of their aircraft. Owners will need education on this. Details are in the BGA AMP part of the website.

Changes to Annual maintenance anticipation

Under old EASA Part M rules the annual inspection could be 'anticipated' by up to 90 days without loss. Under new Part ML rules (from 24th March 2020) *the annual maintenance cannot be anticipated without loss* and is only valid for 12 months from the day the inspector signs the Certificate Release to Service (CRS) on the BGA SDMP 267.

Annual extensions

The annual maintenance can be extended by up to 30 days by the owner if required. Where used, the extension should be recorded in the aircraft logbook. The extension can only work if the ARC is still valid for that extended period. Note - any Airworthiness Directives (ADs) due/applicable that are actioned by calendar dates or hours maintenance cannot be extended.

Changes to the Certificate Release to Service (CRS)

From 24th March, the CRS has changed to reflect that we are now in a Part ML environment. All the BGA forms (204, 205, SDMP 267 and 277) have had to change. Please delete saved forms and replace them with new ones published on the BGA website from 24th March.

Regarding the SDMP 267, we recommend that you simply delete the old CRS and copy and paste the new one in from the new SDMP template. Also, item 81 in the SDMP 267 includes an update adding a CAA safety notice about recommended Carbon Monoxide detection in flight.

Changes to the SDMP MIP (Minimum Inspection Program) for sailplanes and tugs

The good news is that the old programmes are still valid. Apart from CRS changes and item 81 in sailplane SDMP, no more action is needed. The EASA guidance published on Friday 13th March does change more than 30 tasks in minimum inspection programme (MIP) for tugs and sailplanes. However, the guidance is

so full of errors the data in the EASA published MIP cannot be relied upon until the errors have been clarified and fixed. BGA will advise in due course.

ARC Certificate Changes

The previous BGA ARC template has been replaced and it now quotes Part ML regulations. This must be used from 24th March 2020. Please note that we recommend that the expiry date of the annual maintenance is noted on the reverse side of the owners copy of (ie the master) ARC certificate.

ARC Signatory Requirements

The revised requirement includes an experience reduction from 3 years as a BGA inspector to 1 year. There is no longer a requirement to hold an EASA form 4. Please note that the process for becoming an ARC signatory will not change, ie 1-day BGA ARC course and a supervised ARC. The details are being worked with the CAA.

Transition – Part M G and F approvals to ‘Combined Airworthiness Organisation’ (CAO)

We believe this broadly administrative change will happen in October 2020. This means the BGA Sub part F approval (the part of the CAMO that allows you to perform maintenance and small repairs) and the Sub part G (the part of the CAMO that allows you do issue ARCs, do complex maintenance and provides the BGA with a quality system) becomes one organisation which helpfully reduces the CAA audit requirement. However, because all our approval numbers will change in October, the CRS on all our forms will change again in October. BGA will advise in due course.

BGA Exposition Change

As part of the change to CAO, there will be an entirely new exposition that reflects the procedural changes of the new Part ML regulation.

To support the Part ML changes we have had to make numerous amendments to the BGA AMP documents and airworthiness forms. These are the SDMP 267, 277 complex maintenance form, 204 work report, 205 worksheet, BGA AMP ‘use of worksheets’, owners’ responsibilities, and BGA AMP ‘self-declared maintenance programme on how to construct it under Part ML regulations’.

Other non-Part ML rules changes this year

In theory, by 1st October 2020, all BGA inspectors will be transitioned from BGA inspectors to being EASA part 66 licensed personnel. We are working closely and positively with the CAA on this. The timelines are very challenging, and the Corona virus has made them even harder to meet. When we have certainty re the procedures and timelines, all inspectors will be informed.

Brexit

We are officially leaving EASA regulation at the end of December 2020. We do not expect to see many changes to the airworthiness regulations when this happens, although almost certainly that will entail another change to the CRS on forms as the name of the regulation will change. The CAA will copy and paste EASA law at the point of departure into the UK Air Navigation Order. All ‘EASA’ aircraft including sailplanes will continue to be ICAO compliant and therefore have free movement. A significant change is that to export a glider back into an EASA country, it will require a CAA issued Export C of A. In effect, this is an ARC audit performed by a CAA surveyor that will cost a bit more than a normal ARC as it will take a month or so to organise.

Please note that the COVID19 emergency *may* result in temporary changes to implementation dates later in 2020.

Gordon MacDonald

CTO

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