

Implementation guide for the introduction of Safety Management Systems into Part-145 approvals

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Foreword

The Aviation Safety (Amendment) Regulations 2023 (SI 2023 No. 588) amending UK Regulation (EU) No 1321/2014 introduces new requirements as of 1 July 2024 for organisations certified pursuant to Part-145. This guide offers the view of the UK CAA on the implementation of existing Part-145 organisations to the new requirements, based on the Article 4 of UK Regulation (EU) No 1321/2014 as amended by SI 2023 No. 588. This document is guidance material.

This implementation process will be under the oversight of the UK CAA.

Revision history

Issue 1 July 2024

Initial issue.

Convention

In this document:

- 'New Part-145' is the Annex II (Part-145) of UK Regulation (EU) No 1321/2014 as amended by SI 2023 No. 588
- 'Old Part-145' is the Annex II (Part-145) of UK Regulation (EU) No 1321/2014 as amended before SI 2023 No. 588
- 'Implementation findings' are findings of non-compliance related to the Annex II (Part-145) requirements introduced by SI 2023 No. 588 as novel compared to 'old Part-145'. Refer to Appendix I. Closure date for SMS 'implementation findings' must be before 1 July 2026. This may include a single generic implementation finding where the maintenance organisation has not introduced a management system pursuant to the 'new Part-145' requirements.
- 'Oversight finding' in this document, is a finding raised against the requirements of Part 145, before the SMS implementation change is approved.

Introduction

General

SI 2023 No. 588 amending UK Regulation (EU) No 1321/2014 comes into force on 1 July 2024 except for provisions that came into force on 21 June 2023. The content of the UK Regulation (EU) No 1321/2014 is impacted as shown below.

The (unofficial) denomination 'Light aircraft' means the following non-complex motor-powered aircraft:

- Aeroplanes up to 2730 Kg MTOM
- Rotorcraft up to 1200 Kg MTOM / max 4 occupants
- other ELA2 aircraft.

Cover Regulation: Articles 1 to 8 of the Regulation

Changes apply from 1 July 2024

- Article 4 for establishing an implementation period until 1 July 2026.
- Article 5 paragraph 7 added

Annex I: Part-M

Topic

Continuing airworthiness standards – other-than-'light aircraft' and aircraft used by licensed air carrier (Reg. (EC) No 1008/2008)

Changes apply from 21 June 2023

- point M.A.403(b)
- point M.A.502(c) and
- Appendix VII – editorial corrections

Topic

Includes Subpart F and Subpart G organisation requirements, not applicable since June 2023

Changes apply from 1 July 2024

- Appendix IV — discontinues to be applicable to Annex II (Part-145)

Annex II: Part-145

Topic

Maintenance organisation (all types of aircraft types and operation)

Changes apply from 1 July 2024

Refer to appendices to this guide - Appendix I (maintenance organisation) and Appendix II (UK CAA)

Annex III: Part-66

Topic

Maintenance licensing

Changes

Editorial corrections

Annex IV: Part-147

Topic

Maintenance training organisation

Changes

None

Annex Va: Part-T

Topic

Requirements for 3rd country a/c dry leased by an AOC

Changes

None

Annex Vb: Part-ML

Topic

Continuing airworthiness standards – ‘light aircraft’ not used by licensed air carrier

Changes apply from 21 June 2023

ML.A.906(a) added ‘from a regulatory system where Regulation (EU) 2018/1139 does not apply’ as equivalent to third country

Annex Vc: Part-CAMO

Topic

Continuing airworthiness management organisation (all types of aircraft types and operation)

Changes

None

Annex Vd: Part-CAO

Topic

Combined (continuing airworthiness management and/or maintenance) organisation – non-complex aircraft and non-licensed air carrier

Changes

Editorial corrections

Implementation

From 1 July 2024 each maintenance organisation that holds a valid approval certificate issued in accordance with UK Regulation (EU) No 1321/2014, Annex II (Part-145) should comply with the Annex II Section A requirements introduced by SI 2023 No. 588. There is an implementation period allowing the maintenance organisation to correct any non-compliances with the new Part-145 requirements ('implementation findings') before 1 July 2026.

The main change introduced in the regulation is the required implementation of a Safety Management System (SMS) for maintenance organisations. SMS requires, amongst others, to implement hazard identification, risk management and safety assurance processes and the designation of a safety manager. To support the safety management system processes, several organisation requirements have been changed including the safety policy, internal occurrence reporting, competence of staff, and compliance monitoring (replacing quality assurance). The safety risk and compliance monitoring management are considered part of the organisation's overall management system.

To verify that the maintenance organisations have a management system, the regulation also introduces requirements for the UK Civil Aviation Authority (CAA). This should enable the CAA to verify and continuously monitor the effectiveness of the organisations management system and associated safety performance management. It is considered that SMS is a concept that may need to mature over several years. Therefore, it is not anticipated that organisations will have a fully operational and effective SMS in the first oversight cycle or at the end of the implementation period. However, the minimum level to

retain the Part-145 certificate is that the organisation can demonstrate that the system and procedures are 'present' and 'suitable'.

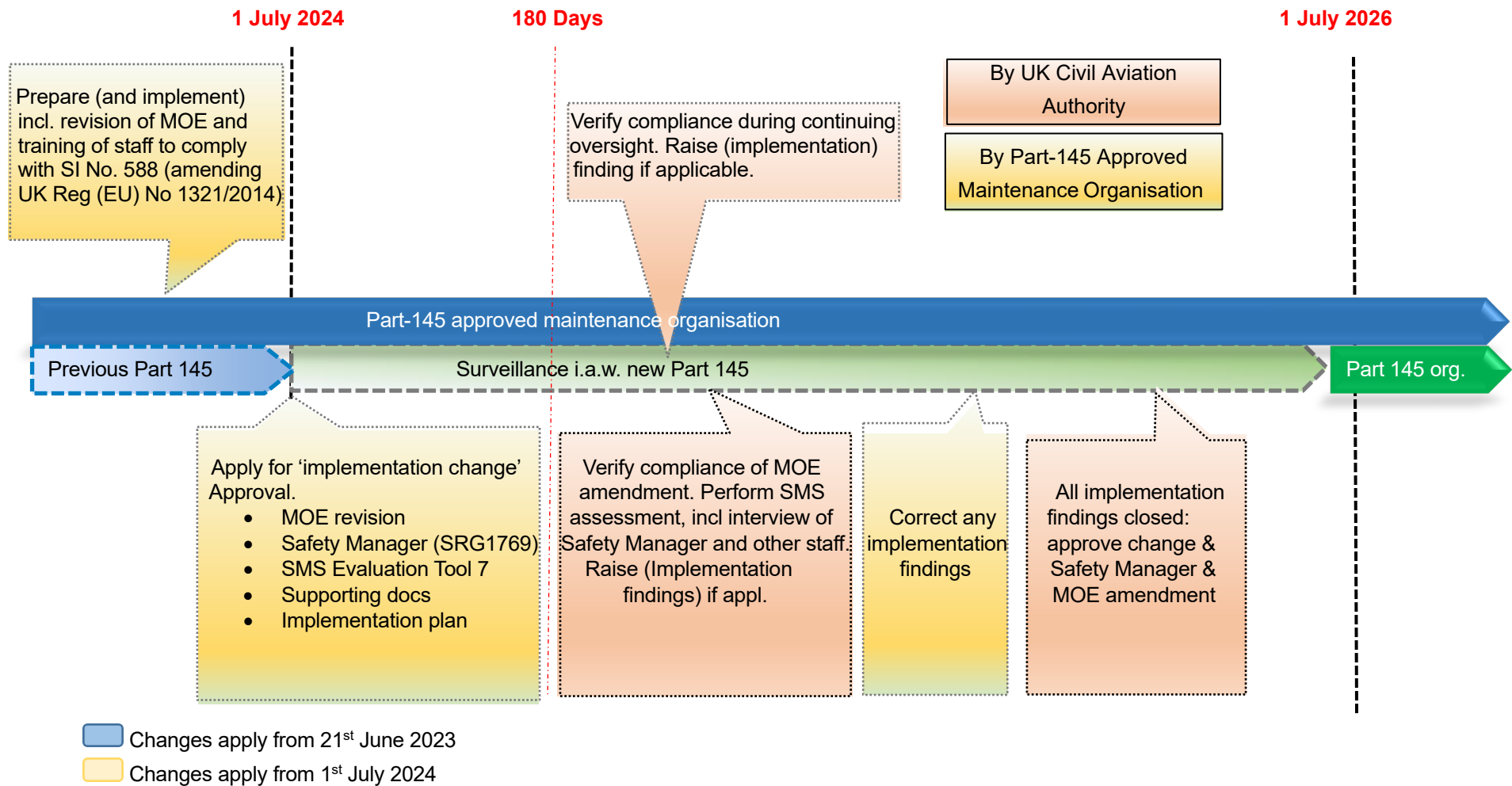
Section 1 - illustrates the timeline process that may be followed by a maintenance organisation and the CAA for the implementation of the amendments to Part 145.

Section 2 - provides a step-by-step approach for the typical implementation process.

Section 3 - provides the proposed action by the CAA.

Appendix A details the changes in Part-145 Section A, which apply to the technical requirements to be met by an organisation.

1 Overview of the implementation to new Part-145



Notes:

- Implementation findings could be generic or individual.
- The flow presents a 24-month implementation process. The CAA expectation is the full process should typically last a few months and be completed well before the deadline.
- 180 Days to submit application from the date the AMC/GM was published (24 May 2024)

2 Guidance for organisations

Organisations not holding a Part-145 Certificate - initial certification

Organisations not holding a Part 145 Certificate for the maintenance of aircraft and components in accordance with Annex II (Part-145) of UK Regulation (EU) No 1321/2014 before 1 July 2024, will be required to:

- Submit an application for initial certification and compliance documentation (including the results of a pre-audit performed by the organisation), in accordance with the applicable requirements, 145.A.15. The application can be submitted via the [CAA website \(Apply for a Part 145 approval\)](#).

Note: that your organisation can be only granted the certificate on 1 July 2024 or later.

Organisations holding a valid Part-145 Certificate on 1 July 2024 - implementation change

The maintenance organisation should develop a plan and implement the necessary changes. The maintenance organisation should submit an [application for SMS implementation for Part 145](#) to the CAA in accordance with 145.A.85, including:

- The relevant [SRG1769](#) forms for all nominated postholders as per 145.A.30(b).
- A copy of the organisations management of change regarding the SMS implementation.
- A completed [SRG1776: CAA SMS Evaluation Tool V7](#)
- The revised MOE pursuant point 145.A.70 including:
 - All changes as required in Appendix A of this implementation guide.
 - The SMS/MSM Manual that forms part of the MOE – (to be submitted alongside MOE, if not included within the MOE).

All other changes as identified within Appendix A should be included in the same submission of the MOE, for approval.

Organisations should submit the 'implementation changes' prior to the **24 November 2024**, to ensure that the CAA has sufficient time to perform the investigation, for raising and evaluating the closure of any findings identified and approving the 'implementation change(s)' before 1 July 2026.

If late or not submitted, the Part-145 approval certificate will be revoked, suspended or limited on **1 July 2026**.

Organisations holding a valid Part-145 Certificate on 1 July 2024 – other changes during implementation period

Maintenance organisation may apply for other changes (such as adding a rating or facility) during the implementation period. The CAA will establish the conditions under which the organisation may operate during the change.

Organisations holding a valid Part-145 Certificate on 1 July 2024 – regular oversight during implementation period

During the implementation period, the CAA will perform continuing oversight. When findings of non-compliance with Part-145 are identified, the CAA will grant a corrective action period related to the type of finding. An 'Implementation finding' may have an implementation period longer than the regular period of 3 months but should ultimately be closed (including acceptance by the CAA) before 1 July 2026. Regular oversight findings will be handled pursuant point 145.B.350.

Organisations holding a suspended Part-145 Certificate on 1 July 2024

When the certificate is suspended the approval is considered not valid pursuant point 145.A.90(a)(3). As the maintenance organisation does not hold a valid approval at the date of applicability of SI 2023 No. 588, the implementational requirement of article 4 paragraph 7 does not apply. Therefore, if the maintenance organisation would like to have its approval reinstated by the CAA, the maintenance organisation must implement and demonstrate compliance with the new Part-145 requirements prior to reinstatement.

3 Proposed actions by CAA

For the assessment of the management systems, the [SRG1776: CAA SMS Evaluation Tool V7](#) is to be used.

Oversight from 1 July 2024 (during SMS Implementation)

The new Part-145 requirements are applicable on the 1 July 2024.

An SMS implementation change submission (including related regulation updates), will be expected before 24 November 2024.

If no submission for an SMS implementation change (including related regulation updates), is received before 24 November 2024, upon evidence of non-compliance with the new Part- 145 is identified, the CAA will raise an appropriate finding against the approval.

On or after 1 July 2026, if the maintenance organisation has not closed such findings, the approval certificate must be revoked, limited or suspended in whole or in part.

Verification of compliance for each 'implementation change' approval request

1. After receipt of the submission, the CAA will establish the conditions under which the organisation may continue to operate, either based on the old Part-145, or based on new Part-145 with limited open implementation findings. This latter requires that the organisation has already implemented SMS and occurrence reporting (in approved MOE) with its staff trained accordingly.
2. The CAA will review the [SRG1776: CAA SMS Evaluation Tool V7](#)
3. The CAA may plan and perform an interview with the Safety Manager.
4. The CAA will review the MOE amendment and supporting documents.
5. If found acceptable, the CAA will arrange to perform an audit to assess the organisation's management system and processes to make sure that all the required enablers of a functioning management system are present and suitable.
6. When non-compliances with the 'new Part-145' are found, an implementation finding will be raised which will need to be closed before 1 July 2026. The CAA may decide to initially grant a corrective action implementation period appropriate to the nature of the finding, before 1 July 2026.
7. When satisfied that the organisation complies with the applicable requirements, the CAA must formally approve the MOE.

Notes:

- Reissuance of the Part-145 certificate “CAA Form 3-145” is not required.
- After the ‘implementation change’ is approved, any non-compliance to new Part-145 is an oversight finding, even if the implementation period is still running.

A Appendix - Novelties in Part-145 Section A

145.A.10 Scope

Changes in ‘new Part-145’

No change in the requirement text

Impact analysis

Potential adjustment only if there are changes in the AMCs/GMs

145.A.15 Application for an organisation certificate

Changes in ‘new Part-145’

Previous title ‘Application’

- (a) to account for applicable Part-M and Part-ML requirements
- (b) extra requirements for applicants for an initial certificate

Impact analysis

Refer to the list of Part-M and Part-ML requirements that needs to be addressed in the MOE/procedures. Despite the new wording the organisation is expected to comply with this requirement before the implementation.

On or after 1 July 2024, organisations pursuing an initial certificate must provide to the CAA the results of a pre-audit performed by the organisation against applicable requirements Part-M, Part-ML and ‘new Part-145’.

Not requiring dedicated implementation finding (or to be covered by MOE, 145.A.70).

145.A.20 Terms of approval and scope of work

Changes in ‘new Part-145’

Previous title “Terms of approval”

Impact analysis

Scope of work in accordance with 145.A.70

Terms of approval attached to the organisation certificate issued by the CAA

Check changes in 145.A.70 – implementation finding foreseen

145.A.25 Facility requirements

Changes in 'new Part-145'

No change

Impact analysis

No impact

Not requiring dedicated implementation finding (or to be covered by MOE, 145.A.70).

145.A.30 Personnel Requirements

Changes in 'new Part-145'

Requirement for 'accountable manager' is reworded with potential impact on the description of responsibilities in the MOE, including nomination of person or group of persons representing the management structure

(b)(1) existing requirement

(b)(2) compliance monitoring instead of quality system

(b)(3) new position 'Safety manager'

(c) existing requirement

(d) re-wording with low impact on compliance

(e) re-wording to account for 'safety management and compliance monitoring', addition of competency to include an understanding of safety management principles.

(f) to (i) no change

(j) extended to cover support staff for base maintenance (j)(1) and other re-wording with low impact on compliance

(k) airworthiness review under Part-ML reference to 145.A.37

Impact analysis

Potential implementation finding.

Accountable manager has a basic understanding of this Regulation (expected to cover 2018/1139 and 1321/2014), in particular new responsibilities to establish and promote safety policy (reference to 145.A.200(a)(2)).

Nominate safety manager and compliance monitoring manager (where possible reusing the quality system function is desirable)

(b)(3): Person responsible for the safety management processes ('safety manager') is subject to the approval of the CAA, as required by 145.A.85.

Nominated person or group of persons demonstrate a working knowledge of the changes in UK Regulation (EU) No 1321/2014 as per this amendment and changes in the new MOE/procedures.

Procedure to change nominated persons will remove the use of the 'CAA Form 4' as the formal approval process. An MOE amendment and approval will be required by the organisation and a CAA Form SRG 1769 will be used to document the nominated post holder, their experience and time allocation.

(e): Organisation to establish and control the competency of the safety manager as well as to include in the competence for all personnel an understanding of the application of safety management principles.

Procedure for airworthiness review under reference to new number 145.A.37.

145.A.35 Certifying staff and support staff

Changes in 'new Part-145'

(a) to (c) no change

(d) to (f) re-wording to emphasize up-to-date knowledge based on recurrent training and to include safety management

(g) no change

(h) updated wording re 'Authorised Person'

(i) reworded to account for nominated group of persons instead of single person

Former (j) requirement to maintain a record of all certifying and support staff is covered by GM 145.A.35

All subsequent requirements are changing letter

145.A.35 (o) requires the need for hands on practical training & assessment

Impact analysis

Training on safety management that can be accomplished through 145.A.30

Not requiring dedicated implementation finding (or to be covered by MOE, 145.A.70).

145.A.36

Changes in 'new Part-145'

This provision has been deleted. New provision 145.A.37 Airworthiness Review Staff details the competency requirements and the related AMC/GM details the records retention.

Not requiring dedicated implementation finding (or to be covered by MOE, 145.A.70).

145.A.37 Airworthiness review staff

Changes in 'new Part-145'

Introduced as new number but the content is equivalent to former 145.A.30(k)

Impact analysis

Editorial changes to the MOE and the procedures may be needed due to new numbering

Eligibility criteria for sailplanes and balloons are relaxed

Requirement removed for AR staff to be independent from the continuing airworthiness management process of the aircraft being reviewed.

Not requiring dedicated implementation finding (or to be covered by MOE, 145.A.70).

145.A.40 Equipment and tools

Changes in 'new Part-145'

No change

Not requiring dedicated implementation finding (or to be covered by MOE, 145.A.70).

145.A.42 Components

Changes in 'new Part-145'

References Part 21.A.307

Impact analysis

Awareness of 21.A.307

Not requiring dedicated implementation finding (or to be covered by MOE, 145.A.70).

145.A.45 Maintenance data

Changes in 'new Part-145'

- (a) no change
- (b) removes items 1-5 and summaries data as that specified in M.A.401
- (c) detected inaccurate, incomplete or ambiguous maintenance data is also recorded as part of the internal safety reporting scheme (referred to in point 145.A.202)
- (d) editorial
- (e) added that also long maintenance tasks must be transcribed onto the work cards or worksheets

Impact analysis

Potential implementation finding.

This can be alternatively covered by an implementation finding against 145.A.202

In case of non-compliance with paragraph 145.A.45(c) in respect to notification to the author, an oversight finding should be raised. The author will be the Design Approval Holder (DAH).

145.A.47 Production planning

Changes in 'new Part-145'

- (a) no change
- (b) planning must take into account the human performance, including the threat of fatigue, as part of the management system
- (c) no change
- (d) new: The organisation must ensure that aviation safety hazards associated with external working teams carrying out maintenance at the organisation's facilities are considered by the organisation's management system.'

Impact analysis

Potential implementation finding.

This can be alternatively covered by an implementation finding against management system 145.A.200.

The organisation should amend current exposition and procedures to account for the changes in this requirement.

145.A.48 Performance of maintenance

Changes in 'new Part-145'

- (a) containing former 145.A.80
- (b) new: The organisation must be responsible for the maintenance that is performed within the scope of its approval.
- (c) (1) to (4) are covering former 145.A.48 (a) to (d)
- (c) (5) new: referring to M.A.403(b) and ML.A.403(b) for assessment of aircraft defects

Impact analysis

Despite the new points and numbers, there are not potential implementation findings with the changes. In case of non-compliance with 145.A.48, an oversight finding should be raised.

Editorial updates to the MOE and the procedures may be needed due to the changes.

Not requiring dedicated implementation finding (or to be covered by MOE, 145.A.70).

145.A.50 Certification of maintenance

Changes in 'new Part-145'

No change

Impact analysis

No potential implementation finding is expected in regards to compliance with the revised 145.A.50

Not requiring dedicated implementation finding (or to be covered by MOE, 145.A.70).

145.A.55 Maintenance and airworthiness review records

Changes in 'new Part-145'

(a), (b) and (c) No changes

Impact analysis

Potential implementation finding.

No change to 145.A.55 – revised AMC/GM has been added.

Other record keeping GM has been developed as below:

- Management System records will be moved under GM1 145.A.200(a)(5).

- Records of Airworthiness Review Staff will be moved under GM 145.A.37
- Airworthiness Review Records will remain covered under 145.A.55(c)
- Certifying and Support Staff Records previously 145.A35(j) will be moved under GM 145.A.35

145.A.60 Occurrence reporting

Changes in 'new Part-145'

(a) and (b) No change to 145.A.60

Impact analysis

No change to 145.A.60 however, new area of standard included 145.A.61

Potential implementation finding of non-compliance with 145.A.61(a). This can be alternatively covered by an implementation finding against 145.A.200

145.A.61 Management System – Additional Occurrence Reporting

Changes in 'new Part-145'

- (a) Introduction of management system
- (b) New instruction on reporting any event that effects an aircraft to the continued airworthiness responsible person.
- (c) Organisations with PPOB overseas must meet the requirements of (c)1-4 as detailed in the rule.
- (d) Organisations referenced in point c must make a follow up report as per items 1 & 2

Impact analysis

Potential implementation finding under 145.A.61.

145.A.65 Maintenance procedures

Changes in 'new Part-145'

Previous title: 'Safety and quality policy, maintenance procedures and quality system'

- (a) safety and quality policy moved to 145.A.200(a)(2). reworded but previously under (b)
- (b) previously under (b)(1) and (b)(2)

Former (c) related to quality system moved to requirement 145.A.200(a)(6)

Impact analysis

Editorial updates to the MOE and the procedures may be needed due to the changes in references.

145.A.70 Maintenance

Changes in 'new Part-145'

Organisation exposition (MOE)

(a)(1) no change

(a)(2) New: safety policy and the related safety objectives

(a)(3) to (5) include person(s) nominated under points 145.A.30(b) and their responsibilities, organisation chart

(a)(6) 'scope of approval' replaced by 'scope of authorisation'

(a)(7) now including the system that is in place to plan the availability of staff

(a)(8) facilities covering all approved locations

(a)(9) added link to point 145.A.20

(a)(10) procedure that sets out the scope of changes not requiring prior approval including notification

(a)(11) editorial change

(a)(12) generalised to the procedures specifying how the organisation ensures compliance with this Annex

(a)(13) added 'regular' to aircraft maintenance services

(a)(14) no change

(a)(15) generalised to all approved locations

(a)(16) no change

(a)(17) **New:** the list of the currently approved alternative means of compliance used by the organisation

(b) and (c): (b) is reviewed to specify that the initial MOE is subject to CAA approval. MOE update and approval process managed as per points (a)(10) and (a)(11). Changes listed in point 145.A.85 must be approved by the CAA.

New: Organisation must develop a procedure to comply with (c), where previously the 'indirect approval procedure' was optionally ('may').

Impact analysis

Potential implementation finding

Non-compliance with 145.A.70.

The organisation should amend current exposition to account for all changes, requiring to address at least:

- the statement signed by the accountable manager confirming work in accordance with the new Annex II as amended by Regulation SI 2023 No 588
- the safety policy (a)(2)
- person(s) nominated under points 145.A.30 (b) (and their duties and responsibilities
- new organisation chart
- a general description of how the organisation ensures availability of staff (a)(7)
- procedure defining the scope of changes not requiring prior approval and describing how such changes will be managed and notified (a)(10) and (11)
- list of the approved locations and not only line stations in (a)(15)
- list of the currently approved alternative means of compliance used by the organisation in (a)(17)

MOE amendment for compliance with (a)(3), (a)(5), (a)(10), (a)(11), (a)(17) and (c) has to be approved by the UK CAA. In case the organisation already has an approved procedure for 'indirect approval', this continues to be applicable unless the CAA determines that the procedure is not meeting the requirements for the procedure changes not requiring prior approval. Refer to the MOE guidance ([CAP2375](#)) to ensure the relevant section is updated accordingly.

Potential implementation finding

Non-compliance with 145.A.70(c). MOE amendment for other changes for compliance with new Part-145 procedures may be in scope of changes not requiring prior approval.

145.A.75 Privileges of the organisation

Changes in 'new Part-145'

(a) and (b) editorial changes

(c) to (e): no change

(f): point is only applicable to organisations with its principal place of business in UK.

Impact analysis

No impact except (f) is not eligible to foreign Part-145 organisations.

145.A.80 Limitations

Changes in 'new Part-145'

145.A.80 deleted. The text is moved to 145.A.48 (a)

Impact analysis

Editorial updates to the MOE and the procedures may need to remove references to 145.A.80 'Greying out' moves to 145.A.48 within the AMC

145.A.85 Changes to the organisation

Changes in 'new Part-145'

No change

Impact analysis

Potential implementation finding

Non-compliance with 145.A.85.

As soon as the corresponding MOE procedures of 145.A.70(a)(10), (a)(11) and (c) are approved by the CAA, the organisation may apply the procedure for changes not requiring prior approval.

145.A.90 Continued validity

Changes in 'new Part-145'

(a)(1) to (3) editorial changes and adding compliance with Regulation SI 2023 No. 588. References to 145.B.350 and 145.A.140

(b): added 'without delay'

Impact analysis

In case of non-compliance, an oversight finding should be raised

Editorial updates to the MOE and the procedures may be needed to update relevant cross references.

145.A.95 Findings and observations

Changes in 'new Part-145'

(a) Previously covered by 145.A.95(c). Added reference to point 145.B.350.

(a)(1) **new** addressing the need to identify the root cause(s) of, and contributing factor(s) to, the non-compliance.

(a)(2) and (a)(3) previously covered by 145.A.95(c).

New It should be noted that the corrective action & implementation plan is subject to assessment and acceptance of the CAA pursuant point 145.B.350(d).

(b) **new** regarding the period agreed with the CAA for the actions.

(c) **new** addressing the need to give due consideration to the observations in accordance with point 145.B.350(f)

Impact analysis

Potential implementation finding

Non-compliance with 145.A.95(a)(2) would require the organisation to establish and implement procedures to submit the corrective action plan within the time frame granted and obtaining the acceptance of the CAA.

In case of non-compliance with aspects covered previously by former 145.A.60 an oversight finding should be raised.

145.A.120 Means of compliance

Changes in 'new Part-145'

New point establishing the criteria to use alternative means of compliance to establish compliance with this Regulation

Impact analysis

Potential implementation finding

Non-compliance with 145.A.120 if the organisation wishes to use an alternative means of compliance, is not needed as far as privilege is not exercised. A procedure for alternative means of compliance that is acceptable to the CAA is needed.

145.A.140 Access

Changes in 'new Part-145'

Access to any facility covered by 145.A.90(a)(2), but now extended to any aircraft, document, records, data, procedures or to any other material and both to the CAA defined in point 145.1 and to the authority performing the oversight tasks in accordance with point 145.B.300(d).

Impact analysis

Even if partially newly introduced, this requirement is not considered as a novelty and no potential implementation finding is expected regarding this requirement. In case of non-compliance, an oversight finding should be raised.

Editorial updates to the MOE and the procedures to update the relevant cross references.

145.A.155 Immediate reaction to a safety problem

Changes in 'new Part-145'

145.A.155 add a new requirement to implement any safety measures mandated by the CAA and any relevant mandatory safety information issued by the CAA.

Impact analysis

Even if newly formally introduced through CAMO.A.155, this requirement is not considered as a novelty and apart from the case of the exposition update to account for that new article (refer to potential implementation finding for MOE, refer to 145.A.70).

In case of non-compliance, an oversight finding should be raised.

145.A.200 Management system

Changes in 'new Part-145'

Requirement introducing novelties

(a)(1) and (a)(2) was previously 145.A.65(a)

(a)(6) was previously 145.A.65(c)

(b) is new

(c) is new but could already be in place

Impact analysis

Potential implementation finding

The organisation should amend current exposition quality system procedure to account for 145.A.200 and 145.A.202. Main novelties are:

- 145.A.200(a)(2): Safety policy and related safety objectives.
- 145.A.200(a)(3): identification of aviation safety hazards and management of associated risks.
- 145.A.200(a)(4): safety promotion

- 145.A.200(a)(5): documentation of all management system key processes. This is considered the main novelty of the regulation.

As part of the implementation of an organisation, the CAA should assess the organisation's management system and processes to make sure that all the required enablers of a functioning management system are present and suitable.

In case of non-compliance with 145.A.200(a)(1)/(a)(4)/(a)(6) an oversight finding should be raised

145.A.202 Internal safety reporting scheme

Changes in 'new Part-145'

Previously partly under 145.A.60(b).

A new 145.A.202 Internal safety reporting scheme is added to establish an internal reporting scheme supporting the organisation's hazard identification and safety risk management processes and fostering its safety culture

Impact analysis

Potential implementation finding.

The internal reporting scheme must also be accessible to organisations working under the management system (i.e. sub-contractors). It also forms the basis for establishing mandatory and voluntary occurrence reporting as required by Regulation (EU) No 376/2014.

The organisation should amend its procedures to account for 145.A.202

145.A.205 Contracting and subcontracting

Changes in 'new Part-145'

A new 145.A.205 Contracting and subcontracting is added to clarify the responsibility of the Part-145 organisation to ensure that any contracting or subcontracting complies with applicable requirements.

Note that provisions for subcontracting were previously in AMC 145.A.75(b).

Impact analysis

Potential implementation finding.

The organisation should amend current exposition to account for 145.A.205.

In case of non-compliance with previous existing requirements (e.g. 145.A.75(b)), an oversight finding should be raised.