

**NOTIFICATION OF AUTHORIZED AMENDMENT (MAA-NAA- 16/18)**

<b>Document Set(s):</b>	MRP 4000 Series	<b>Regulatory Article(s)/Manual Chapter(s)</b>	RA 4800 RA 4809 RA 4812 RA 4813 RA 4815 RA 4816
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<b>RFC Reference</b>	MAA-RFC-2011-71, MAA-RFC-2014-50, MAA-RFC-2014-215, MAA-RFC-2014-258, MAA-RFC-2014-259, MAA-RFC-2014-279, MAA-RFC-2015-040, MAA-RFC-2015-132, MAA-RFC-2015-135, MAA-RFC-2015-145, MAA-RFC-2015-158, MAA-RFC-2015-159, MAA-RFC-2015-160, MAA-RFC-2015-173, MAA-RFC-2015-174, MAA-RFC-2015-222, MAA-RFC-2015-225	<b>NPA Reference</b>	NPA 15/07 NPA 16/05
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<b>Amendment Author</b>	DSA-MAA-REG-CAw2a	Redacted	<i>Redacted</i>
<b>Amendment Supervisor</b>	MAA Reg CAw1	Redacted	<i>Redacted</i>
<b>Amendment Independent</b>	DSA-MAA-REG-REG-DepHd	Redacted	<i>Redacted</i>

<b>Amendment Classification</b> (As per MAA SOP 20 Matrix)	<b>Routine (1*/OF5)</b>	<b>Publishing Requirements:</b>	
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**AUTHORIZED AMENDMENT**

Note to provide a summary/overview of the amendment and to explain/ensure that the reader understands: the rationale for the amendment; the major changes; and, importantly, the full context (including desired outcome) of the amendment.

***The input here should be your 'one minute' to explain what, why and how.***

The MAA addressed a number of Requests For Change to resolve errors found in the affected Regulatory Articles (RAs). In addition the MAA has sought to clarify some areas and further align regulation to that of the European Military Airworthiness Requirements (EMAR) by introducing the UK MAA Form 1; the national derivative of the EMAR Form 1 template. Specifically, the changes introduced by this NAA are as follows:

RA 4800: Clarifies the need for approved organizations to adhere to other contracted MRP regulation not only MRP Part 145.

RA 4809: Introduces the UK MAA Form 1 as well as clarification on the acceptability of European Aviation Safety Agency (EASA) Form 1 and EMAR Form 1 derivatives of a National Military Airworthiness Authority

(NMAA) who have recognition agreements with the UK MAA.

RA 4812: Alignment of the linkage between this RA and RA 4809.

RA 4813: Clarification of the titles and existing language within the regulations to better reflect its content.

RA 4815: Addition of further text from EMAR on Electrical Wiring Interconnection Systems and critical design limits. Correction of the duplicate paragraph in Guidance Material. Changes to the audit plan to detail all of the RAs required to be included.

RA 4816: Clarification of the need to understand the RA in entirety and introduction of a compliance matrix format for use by organizations seeking approval.

<b>ISSUE STATE CHANGES</b> (if more lines required, contact the MRP Team)			
<b>Document Title</b>	<b>Previous Issue</b>	<b>New Issue</b>	
RA 4800 - General Requirements (MRP Part 145)	Issue 7	To	Issue 8
RA 4809 - Acceptance of Components (MRP 145.A.42)	Issue 3	To	Issue 4
RA 4812 - Certification of Aircraft and Component Release (MRP 145.A.50)	Issue 3	To	Issue 4
RA 4813 - Maintenance Records (MRP 145.A.55)	Issue 3	To	Issue 4
RA 4815 - Maintenance Procedures and Safety and Quality Policy (MRP 145.A.65)	Issue 3	To	Issue 4
RA 4816 - Maintenance Organization Exposition (MOE) (MRP 145.A.70) - Approved Maintenance Organizations (AMOs) only	Issue 5	To	Issue 6
		To	
		To	
		To	
		To	

<b>APPROVAL</b>  Approved by: (IAW MAA SOP 20 Matrix)	<b>Post</b>	DSA-MAA-RegCert-Hd	<b>Original, non redacted, signed</b>
	<b>Name</b>	Redacted	
	<b>Rank</b>	Redacted	

**MAA CONSOLIDATED RESPONSE TO NOTICE OF PROPOSED AMENDMENT 16/05**

1. The following comments were sent to the MAA in response to Notice of Proposed Amendment (NPA) 16/05, which outlined proposed amendments resulting from Requests for Change to:

- a. RA 4800 – General Requirements (MRP Part 145).
- b. RA 4809 – Acceptance of Components (MRP 145.A.42).
- c. RA 4812 – Certification of Aircraft and Component Release (MRP 145.A.50).
- d. RA 4813 – Maintenance Records (MRP 145.A.55).
- e. RA 4815 – Maintenance Procedures and Safety and Quality Policy (MRP 145.A.65).
- f. RA 4816 – Maintenance Organization Exposition (MOE) (MRP 145.A.70) – Approved Maintenance Organizations (AMOs) Only.

The responses from the MAA are in italics below each comment, which are grouped against the corresponding regulation.

<b>NPA 16/05 Consolidated Comments</b>	
<b>General</b>	<p><b>(1) General Comments</b></p> <p>There are a number of references to MOD CAM whereas RA 1016 now defines this person as the Mil CAM, including RA4800, Annex A, Paras 5.b, 19 &amp; 22.b.</p> <p><i>MAA Comment</i>  <i>The references to MOD CAM should be changed to Mil CAM; however, the references will remain until the next MRP 145 uplift. This is currently underway as part of the MAP-01 review (RN 2015/11 refers). The rationale being that the entire MRP Pt 145 should have a consistent terminology rather than swapping between Mil and MOD CAM as they are read.</i></p>
<b>RA 4800</b>	<p><b>(2) RA 4800 GM Para 5</b></p> <p>MAA01 states that it is the MOD (that) is responsible for deciding the applicable RA. What happens if (the RA are) not contracted?</p> <p><i>MAA Comment</i>  <i>Defence policy in this area is set down in MAA01. It is incumbent upon the MOD contracting agent to ensure they have specified the full extent of required regulatory compliance within the contract between the approved organization and the MOD. The MAA will raise Corrective Action (see MAA01) on those organizations that are not adhering to regulations that the MAA deems applicable for Air Safety purposes. The MOD contracting agent and the organization will then need to agree any contractual changes and provide implementation plans to the MAA for agreement. In the case of a serious accident happening where a cause is determined to be a contract not compliant with the MRP, the investigating Authority would need to take a view.</i></p>

	<p><b>(3) RA 4800 GM Para 7</b></p> <p>There is a discrepancy on the definition of “UK Government Property”. MAA02 defines it as “Land, objects or artefacts belonging to the UK state”; however, RA4800 Para 7 refers to UK Government Property only as UK Government land – this has implications for when, where and to whom the Regulations apply.</p> <p><i>MAA Comment</i>  <i>The definition within RA 4800 is specific to MRP Part 145. It is a tightening of the definition contained within MAA02. This tightening of definitions is due to the need to specify the applicability to that maintenance activity undertaken on UK Government land and on Royal Navy and Royal Fleet Auxiliary ships. The MAA’s view is that the regulation is very clear in its requirements for whether the organization requires MAOS approval or not. However, GM paragraph 7 has been amended to clarify the rationale behind the use of the term “property”.</i></p>
<p><b>RA 4809</b></p>	<p><b>(4) RA 4809(1) AMC Para 1.a</b></p> <p>Given that EASA Basic Regulation is not applicable to state aircraft and by extension products, parts or appliances that have state only applicability (parts only used on the state version of the aircraft) can the MAA clarify under what circumstances an EASA Form 1 would be acceptable?</p> <p><i>MAA Comment</i>  <i>After clarification from EASA the MAA will only accept EASA Form 1 issued by an EASA approved organization, for products, parts and appliances within the scope of such an approval, under the following circumstances:</i></p> <ul style="list-style-type: none"> <li>- <i>For New parts issued under EASA Pt 21 regulations.</i></li> <li>- <i>Maintained, repaired or overhauled parts having applicability<sup>1</sup> to civilian registered aircraft, that are also utilized on military registered aircraft, released under Practice 1<sup>2</sup> of the EASA Certificate of release regulations<sup>3</sup>.</i></li> </ul> <p><b>(5) RA 4809(1) AMC Para 1.b</b></p> <p>Will MOD stores know (that MAA Form 1, an applicable EMAR Form 1 and EASA Form 1 are acceptable) and what to do?</p> <p><i>MAA Comment</i>  <i>The EASA Form 1 and EMAR Form 1 were already listed within RA 4809 as acceptable and were not listed in the JSP 886 or the Defence Logistics Framework (DLF) yet there have been no instances of Request for Change (RFC) on this subject. The MAA have engaged with the Defence Logistics Authority (ACDS(Log Ops))</i></p>

<sup>1</sup> Certified as a part or appliance by or on behalf of EASA for use on civil type certified aircraft.

<sup>2</sup> Practice 1 is defined within EASA Letter JAN/kgu/R(4) 2013(D)51397 – Rulemaking interpretation on “Maintenance release of aircraft not covered by the basic regulation”, as being released to the requirements of EASA 145.A.50(a) within field 14a of the Certificate of Release - EASA Form 1; ie the work was undertaken and legally certified under the full control of the nationally recognized EASA Authority. The EASA Letter can be found at the following link:

[https://www.easa.europa.eu/system/files/dfu/13D51397\\_Maint\\_release\\_of\\_aircraft\\_not\\_covered\\_by\\_BR\\_for\\_website\\_publication.pdf](https://www.easa.europa.eu/system/files/dfu/13D51397_Maint_release_of_aircraft_not_covered_by_BR_for_website_publication.pdf)

<sup>3</sup> The part or appliance must be the civil certified version and not a derivative for military use; ie it must be the part number or appliance specification certified, not just a military specific part number.

	<p><i>and have proposed changes to the DLF. The changes to the DLF will take time to process but these forms will need to be added to expositions (and approved by the MAA in accordance with RA 4816(2) – Amendment of an MOE (MRP 145.A.70(b))). It is anticipated that the MAA has sufficient levers to halt the application of this regulation within the AMO, should it be required to align with the DLF change process.</i></p> <p><b>(6) RA 4809(4)</b></p> <p>Does a DO have this privilege? (This query related to the ability of a DO to provide approved data for extensions to service life of a component/part)</p> <p><i>MAA Comment</i>  <i>The new MRP Part 21 regulation will provide greater privilege to Approved Design Organizations (ADO), if enacted by the TAA, which will result in the TAA no longer being required to ‘countersign’ the release of approved data.</i></p>
<p><b>RA 4812</b></p>	<p><b>(7) RA 4812</b></p> <p>Release statement from CAP562 Leaflet B-40 (March 2016) is: “Certificates that the work specified, except where otherwise stated, has been carried out in accordance with the procedures and standards specified in Part 145 and MRP Supplement and in respect of that work the aircraft is considered ready for release to service.”</p> <p>This is different from the statement specified in this paragraph [RA4812(2) 3.b] for alternative documentation [to MOD Form 700].</p> <p>RA4800 Annex A para 18 also refers to Leaflet B-40, but is less prescriptive in its requirements.</p> <p>As the statement in RA4812 is AMC and says that the statement “should” be used it has primacy so will require a AAMC to show compliance with RA4800 Annex A.</p> <p>This seems overly complicated and not necessary when there is a statement agreed between MAA and CAA in leaflet B-40.</p> <p>Suggest that either RA4812(2) is amended to align with leaflet B-40 or leaflet B-40 is updated to align with RA4812(2).</p> <p><i>MAA Comment</i>  <i>Paragraph 18a of Annex A to RA 4800 refers. The statements within RA 4812 and CAP 562 Leaflet B-40 are intended for different applications. The statement in RA 4812 is for use by Approved Maintenance Organizations in support of work on military aircraft not managed under the auspices of CAP 562 Leaflet B-40. Organizations approved under the Supplement route (RA 4800 Annex A) are not required to comply with the full MRP Part 145, rather they are required to be in compliance with EASA Part 145 and the MRP Part 145 Supplemental requirements expressed within RA 4800 Annex A only. Approved Maintenance Organizations that are working to MRP Part 145 alone are required to comply fully with the requirements of RA 4812.</i></p>
<p><b>RA 4815</b></p>	<p><b>(8) RA 4815(2)</b></p> <p>Is there a training burden for auditor staff to understand these regulations and their impact? (It was felt that auditors may require additional knowledge</p>

to audit for the training requirements of EWIS or other such regulation)

*MAA Comment*

*The need for audit staff to conduct training to understand and apply the regulation is a point for the auditor organization. The MAA acknowledges that changes to the regulation will require changes to knowledge, but, as the MAA meet the accreditation requirements of the International Register of Certified Auditors, management of the Oversight and Approvals teams would review the needs of the audit teams and respond accordingly.*