

MAINTENANCE AGREEMENT GUIDANCE

BETWEEN THE

**FEDERAL AVIATION ADMINISTRATION OF THE
UNITED STATES OF AMERICA**

AND THE

**CIVIL AVIATION AUTHORITY OF
THE UNITED KINGDOM OF GREAT BRITAIN AND
NORTHERN IRELAND**



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MAINTENANCE AGREEMENT GUIDANCE

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Section A - Interaction between the FAA and the CAA

1.0 INTRODUCTION.

- 1.1** This document sets forth guidance for approval and monitoring of maintenance and alteration or modification facilities pursuant to the Maintenance Implementation Procedures (MIP) Under the Agreement between the Government of the United States of America and the Government of the United Kingdom of Great Britain and Northern Ireland (UK) for the Promotion of Aviation Safety (BASA). The Federal Aviation Administration (FAA) and the Civil Aviation Authority (CAA) (collectively, Authorities and individually, Authority) have agreed to cooperate and provide technical support in evaluating and accepting each other's approved maintenance organization systems. This Maintenance Agreement Guidance (U.S.-UK MAG) contains the respective responsibilities and procedures for recommendations for FAA certification, renewal of certification, certificate amendments, and continued monitoring of maintenance and alteration or modification facilities located in the UK. The U.S.-UK MAG also describes the actions required of applicants located in the United States seeking Maintenance Organisation Approval under Commission Regulation (EU) No. 2018/1139, as applicable in the UK legal system by virtue of the European Union (Withdrawal) Act 2018.
- 1.2** FAA legal standards for safety regulation are contained in Title 49 United States Code (49 U.S.C.), Subtitle VII, Part A, Subparts I, III, and IV; and Title 14 Code of Federal Regulations (14 CFR), Chapter I, Subchapters A, C, and G. Guidance material and policy are outlined in ancillary documents and procedures, such as FAA Orders, policy memoranda, and Advisory Circulars (AC).
- 1.3** The Government of the UK has participated in the European Aviation Safety Agency (EASA) (now named the European Union Aviation Safety Agency) since 2003, when the European Union (EU) established EASA pursuant to Regulation (EC) 1592/2002. This regulation has since been repealed and replaced by Regulation (EU) 2018/1139 (Basic Regulation), which came into force on 11 September 2018 and is applicable in UK law through the European Union (Withdrawal) Act 2018 together with all applicable and in force regulations as of December 31, 2020. The Basic Regulation and all other in force and applicable implementing regulations have been amended by the UK's Aviation Safety (Amendment etc.) (EU Exit) Regulations 2019 to address failures of retained EU law to operate in the UK (as opposed to throughout the EU) effectively and to remedy any other deficiencies arising from the withdrawal of the UK from the EU. Relevant departmental procedures, guidance materials, and policies are contained in the CAA's Management System. The CAA's technical standards incorporate, by reference, requirements for continuing airworthiness, as outlined in Commission regulations and Certification Specifications (CS). Guidance material and policy are contained in Acceptable Means of Compliance (AMC) and Guidance Material (GM).
- 1.4** The FAA and the CAA have identified the differences between the (UK) Part 145 regulations and 14 CFR part 145 regulations. These differences are listed in the MIP as Special Conditions. As a result, UK-based Part 145 Approved Maintenance Organisations (AMO), when in compliance with the FAA Special Conditions listed in the MIP, may

apply for a 14 CFR part 145 repair station certificate. The CAA shall rely on EASA certificates issued on the basis of the Annex 2 of the U.S.-EU Agreement for U.S. based 14 CFR part 145 repair stations located within the United States wishing to perform work on civil aeronautical products under the regulatory control of the UK CAA until January 1, 2023.

- 1.5** The FAA's surveillance program frequency of U.S. based, EASA certificated AMOs is described in FAA Order 8900.1, Flight Standards Information Management System (FSIMS), Volume 10. In addition, FAA Order 8900.1, Volume 10 also provides the policy for developing and executing baseline risk-based surveillance activities. The Safety Assurance System (SAS) uses risk-based concepts to identify hazards and manage risk through adjustments of the work program, which allows an aviation safety inspector (ASI) to target specific areas of elevated risk.
- 1.6** The CAA's surveillance program frequency of surveillance of UK based 14 CFR part 145 repair stations is described in (UK) Part 145, Section B. Unscheduled surveillance visits to the AMO may be conducted when an organization requests for new or additional capabilities, or the organization has undergone major changes or expansion. Unannounced audits may also be conducted on randomly selected organizations.

2.0 GENERAL U.S.-UK MAG INFORMATION.

2.1 The U.S.-UK MAG is divided into the following five sections:

- a. Section A. Interaction between the FAA and the CAA.
- b. Section B. Requirements for UK-recognized EASA AMOs located in the United States.
- c. Section C. Requirements for 14 CFR part 145 repair stations located in the UK.
- d. Section D. Entry into force and termination.
- e. Section E. Authority.

2.2 Communications.

2.2.1 The FAA and the CAA shall keep each other informed of significant changes within their respective system, such as:

- a. Statutory responsibilities.
- b. Organizational structure (e.g., personnel, management structure, technical training, staffing, office location).
- c. Significant revisions to maintenance organization approval oversight systems standards or procedures.

NOTE: In case of an external audit by a U.S. or UK official entity (e.g., Office of Inspector General), the FAA and CAA shall coordinate the audit activities. The point of contact to coordinate these activities will be determined by the FAA Aircraft Maintenance Division (AFS-300) and the CAA Safety and Airspace Regulation Group, Future Safety Department (SARG).

- 2.2.2 Contact information for the various technical aspects of the U.S.-UK MAG, including communication of urgent issues, is located in Section A, Appendix 1.
 - 2.2.3 Revision to FAA or CAA regulations, acceptable means of compliance, guidance material, policies, procedures, or organizational structure, which may affect the basis and the scope of this U.S.-UK MAG, should be notified in a manner consistent with the MIP. Accordingly, upon notice of such changes, the FAA or the CAA may request a meeting to review the need to amend this U.S.-UK MAG.
- 2.3** Special Conditions. Maintenance organizations must comply with all the applicable Special Conditions that are contained in Appendix 1 of the MIP.
- 2.3.1 FAA Special Conditions specify the requirements of 14 CFR parts 43 and 145 that do not have equivalent requirements in the (UK) Part 145 regulations.
 - 2.3.2 CAA Special Conditions specify the requirements in (UK) Part 145 that do not have equivalent requirements in 14 CFR parts 43 and 145. The CAA will rely on the Special Conditions contained in Annex 2 of the U.S.-EU Agreement.
- 2.4** Websites. The MIP and U.S.-UK MAG are located at the following websites:
- a. FAA Website:
 - 1) http://www.faa.gov/aircraft/air_cert/international/bilateral_agreements/baa_basa_listing/.
 - 2) <http://www.faa.gov/aircraft/repair/>.
 - b. CAA Website: <https://www.caa.co.uk/home/>
- 2.5** Interpretation and Resolution of Issues between the FAA and the CAA. The FAA and the CAA shall address interpretations and resolve issues through consultation or any other mutually agreed upon means. Every effort must be made to resolve the issues at the lowest level possible. The FAA and the CAA have agreed to the following processes:
- a. For U.S.-located facilities involving UK registered aircraft, or the components for fitment onto such aircraft, the FAA Coordinator (AFS-300) is the first point of contact to coordinate issues with the CAA National Coordinator.
 - b. For UK-located facilities, the CAA National Coordinator is the first point of contact to coordinate issues with the FAA Coordinator of the New York International Field Office (IFO). Unresolved issues will be expeditiously forwarded to the FAA

Coordinator (International Field Office Management Branch (AFS-54)). AFS-54 may consult with AFS-300, as needed.

- c. Issues that cannot be satisfactorily resolved between the FAA AFS-300 Division Manager and the CAA SARG will be added to the next formal meeting agenda for further consideration.
- d. Issues that are not resolved by the next formal meeting will be forwarded to the FAA Director of Safety Standards (AFS-1) and the CAA Director of the SARG for resolution.

NOTE: Meeting attendees should include the offices responsible for the technical coordination of this guidance and additional officials of the FAA and the CAA as needed to address the meeting agenda items. At the discretion of the joint leadership, staff and representatives of other appropriate organizations may be invited to participate. The host is responsible for meeting minutes and action items that are mutually tracked.

2.6 Revisions to the U.S.-UK MAG. Revisions to any applicable regulations, alternative methods of compliance (AMOC), guidance material, policies, procedures, and organizational structure may affect the scope of this guidance. Accordingly, the U.S.-UK MAG may need revisions by the FAA and the CAA.

- 2.6.1 The FAA Director of Safety Standards and the CAA Director of the SARG, or their designees, shall consult annually to review the MIP and any proposed changes to the U.S.-UK MAG as needed.
- 2.6.2 The FAA Director of Safety Standards and the CAA Director of the SARG, or their designees, have the authority to approve revisions to the U.S.-UK MAG. The revisions shall become effective on the date of signature, unless otherwise noted.
- 2.6.3 Any revision to the U.S.-UK MAG that affects FAA or CAA Supplement revisions must be incorporated by the maintenance organizations within 90 days from the effective date.
- 2.6.4 The U.S.-UK MAG's Revision History page contains a record of all revisions, including a brief description of the revision.
- 2.6.5 The MIP is the controlling document for Special Conditions. Any revisions to the MIP related to Special Conditions shall be incorporated into the U.S.-UK MAG.

2.7 Aircraft Repair Station Security. On January 13, 2014, the U.S. Transportation Security Administration (TSA) final repair station security rule was published in 49 U.S.C. § 44924. The FAA shall notify the TSA when an FAA 14 CFR part 145 certification has concluded and an Air Agency Certificate is issued.

3.0 DEFINITIONS.

3.1 In addition to the definitions found in Article II of the U.S.-UK BASA and Paragraph 1.7 of the MIP, and notwithstanding definitions contained in 14 CFR part 145 or the (UK) Part 145 regulations, for the purposes of this U.S.-UK MAG, the following definitions apply:

- a. **Accountable Manager.** The Accountable Manager is normally intended to mean the chief executive officer (CEO) of the organization, who, by virtue of position, has overall responsibility for running the organization (in particular and applicable to the CAA, financial responsibility) and ensuring that all maintenance is carried out to the standard required by the FAA and the CAA. When the Accountable Manager is not the CEO, he/she shall have direct access to the CEO and have a sufficiency of maintenance funding allocation.
- b. **Alteration or Modification.** Refer to Article II of the BASA.
- c. **Article.** An article means a material, part, component, process, or appliance.
- d. **CAA National Coordinator.** The CAA National Coordinator serves as the primary liaison for all communications with the FAA. The CAA National Coordinator establishes a line of communication with the appropriate FAA representative to facilitate the smooth implementation and operation of this U.S.-UK MAG.
- e. **Civil Aeronautical Product.** Refer to Article II of the BASA.
- f. **FAA Coordinator (AFS-54).** The FAA Coordinator in the International Field Office Management Branch (AFS-54) serves as the primary liaison for all communications with issues concerning FAA repair stations located outside of the United States. Additional duties and responsibilities of this position can be found in FAA Order 8900.1.
- g. **FAA Coordinator (IFO).** The New York International Field Office (IFO) FAA Coordinator is the first Point of Contact (POC) for oversight responsibilities for 14 CFR part 145 repair stations located in the UK. The FAA Coordinator (IFO) establishes a line of communication with the appropriate CAA representative to facilitate the smooth implementation and operation of this U.S.-UK MAG.
- h. **FAA Coordinator (AFS-300).** The FAA Coordinator supports the MIP and U.S.-UK MAG policy and serves as the liaison between the FAA Coordinator (AFS-54), and the CAA. The FAA Coordinator (AFS-300) also manages interactions pertaining to interpretation of policy issues and other related activities. The FAA Coordinator serves as the primary point of contact for Flight Standards offices with oversight responsibility of U.S.-based repair stations holding AMO approval. This position also provides a central point of contact for the CAA on issues, such as AMO Sampling Inspection System (SIS) audits, communicating changes in FAA guidance, and sharing information related to CAA-identified issues.
- i. **Maintenance Agreement Guidance (U.S.-UK MAG).** The procedural document that defines the procedures and activities as agreed between the FAA and the CAA and

contains the requirements to implement the Special Condition requirements under the MIP to be met by repair stations and AMOs.

j. Maintenance Implementation Procedures (MIP). The document that defines the maintenance implementation procedures as agreed between the FAA and the CAA authorized under the U.S.-UK BASA.

k. Modification. Means alteration.

l. Monitoring. Refer to Article II of the BASA.

m. Overhaul. Refer to Paragraph 1.7 of the MIP.

NOTE: A person may describe an article as overhauled only after it has been at least disassembled, cleaned, inspected, repaired as necessary, reassembled, and tested in accordance with the above-specified data.

n. Required Inspection Items (RII). Title 14 CFR §§ 121.369(b)(2) and 135.427(b)(2) require U.S. air carriers to designate the items of maintenance and alteration that must be inspected (required inspection) as RIIs and list them in its manual. RIIs must include, at a minimum, those items that, if not properly performed or if improper parts or materials are used, could result in a failure, malfunction, or defect endangering the safe operation of the aircraft. The RIIs must be inspected by a person other than the one who performed the work, authorized it, and who is under the control of the air carrier inspection unit.

o. Special Conditions. Refer to Paragraph 1.7 of the MIP.

4.0 FAA AND CAA TRAINING/BRIEFINGS.

4.1 In order to comply with the U.S.-UK MAG and the requirements of the MIP, FAA ASIs, with assigned repair stations holding (UK) Part 145 approval, and CAA Surveyors, with assigned AMOs holding 14 CFR part 145 approval, shall complete initial training or workshop briefings prior to the implementation of the MIP. The initial training/briefing will introduce the MIP, the applicable Special Conditions, and certification procedures contained in the U.S.-UK MAG.

4.2 The FAA Coordinator(s) and the CAA National Coordinator shall ensure adequate training or workshop briefings are administered to assigned inspectors/surveyors prior to the implementation of the MIP.

4.3 Recurrent training or briefings should be conducted at two year intervals, or sooner, if necessary. The training or briefings should cover any revisions to the MIP or U.S.-UK MAG, lessons learned from technical issues, and results from the Sampling Inspection System (SIS) analysis.

4.4 Web-based training and briefings, PowerPoint presentations, or other methods are

acceptable. The FAA's AFS-300 and the CAA shall develop and control the training information.

- 4.5 The FAA or the CAA may provide additional on-the-job training or briefings, as necessary.
- 4.6 The FAA and the CAA shall document training and briefing attendance. These records will be available upon request.

5.0 TRANSITION PROVISIONS.

5.1 The transition from Annex 2 of the U.S.-EU Agreement to the MIP for repair stations located in the UK will be accomplished within 90 days of the entry into force date of the MIP. The transition will be accomplished in accordance with the following transition provisions:

- a. The FAA Coordinator (IFO) and the CAA National Coordinator must coordinate and plan the transition requirements for repair stations located in the UK.
- b. The FAA and CAA shall provide records documenting the completion of the workshop briefing of its personnel regarding procedures relating to the MIP, the Special Conditions, and the U.S.-UK MAG, prior to the transition.
- c. The FAA shall provide written correspondence to each repair station advising them of the transition to the MIP and the U.S.-UK MAG requirements.
- d. The FAA or the CAA, as appropriate, may provide additional internal or external clarification, briefings, joint inspections, or on-the-job training as necessary.

5.2 Manual Supplement Requirements. Maintenance organizations will submit a manual supplement as outlined in the applicable section of the U.S.-UK MAG.

5.2.1 The FAA shall request each 14 CFR part 145 repair station located in the UK to review the U.S.-UK MAG, Section C and prepare a revision to the FAA Supplement. The FAA Supplement must be submitted to the CAA within 90 days of entry into force date of the MIP. The FAA Coordinator (IFO) and CAA National Coordinator shall keep a record of the status of the manual supplements to ensure all repair stations located in the UK have transitioned from Annex 2 of the U.S.-EU Agreement to the MIP.

NOTE: It is not necessary for the FAA to review the Maintenance Organisation Exposition (MOE) or FAA Supplement prior to the transition where the FAA Supplements were previously accepted. The FAA may request to review the MOE or FAA Supplement at any time.

5.2.2 Until January 1, 2023, the CAA shall rely on the EASA Supplement based on Annex 2 of the U.S.-EU Agreement for U.S.-based AMOs wishing to perform

work on civil aeronautical products under the regulatory control of the CAA. Additional amendments to the EASA Supplement are not necessary. The CAA may request to review the Repair Station Manual (RSM)/Quality Control Manual (QCM) and/or EASA Supplement at any time.

5.3 Unimpeded Access. The FAA and the CAA shall assist the other in gaining unimpeded access to repair stations and AMOs under its jurisdiction.

6.0 RATING COMPARISON AND GUIDANCE. The FAA and the CAA shall conduct surveillance of repair station and AMO's regulatory compliance, including compliance with the Special Conditions. The certificate issued by an Authority under the MIP will not exceed the ratings or scope of work contained in the certificate issued by the other Authority, unless specified by a Special Condition listed in the U.S.-UK MAG. The Rating Comparison Matrix (see Section A, Appendix 2) is a tool to assist the FAA and the CAA in determining rating comparisons.

7.0 FAA AND CAA RESPONSIBILITIES/ACTIONS. To promote continued understanding and compatibility with each other's maintenance surveillance systems, the FAA and the CAA need to consult and share information to mitigate risks associated in aviation.

7.1 Terms of the MIP. Under the terms of the MIP, the FAA and the CAA shall:

- a. Follow the certification procedures in the U.S.-UK MAG for applicable repair stations and AMO applications.
- b. Provide recommendations for initial certification, renewal, and amendment of repair station's and AMO's approval.
- c. Perform surveillance and provide reports regarding the findings of compliance with the procedures outlined in the U.S.-UK MAG.
- d. Accept or approve, as appropriate, the supplements as described in the U.S.-UK MAG.

7.2 Reciprocal Acceptance of Findings of Compliance. The FAA and the CAA shall accept each other's inspections and monitoring of maintenance organizations for findings of compliance with their respective requirements and the basis for the issuance and continued validity of certificates.

7.3 Accident/Incident Investigation Request. The MIP, Chapter III, paragraph 3.7 stipulates that the FAA and the CAA shall exchange, on request and in a timely manner, any information regarding accidents/incidents involving civil aeronautical products or regulated entities.

7.4 Cooperation in Internal Quality Assurance Activities. To promote continued

understanding and compatibility with each other's maintenance systems, the FAA and the CAA shall consult and share information on internal quality assurance programs. For this purpose, the FAA and the CAA focal points should exchange internal audit reports and schedules to allow for mutual attendance as observers in each other's activities. They should also discuss significant safety findings and reports on matters relating to the MIP.

7.4.1 Internal Quality Assurance Data and Requested Information. The FAA and the CAA shall, upon request and without prejudice to the discretionary power of the FAA and the CAA, provide appropriate information regarding the summary of internal audit reports.

7.4.2 Involvement as Observers. In order to assist the FAA and the CAA in planning and managing each other's internal inspection visit schedule and teams, the FAA and CAA shall notify each other in writing at least two months in advance indicating which audits they wish to attend as observers.

7.4.3 Onsite Observation. The FAA or the CAA onsite observations should include opening and closing meetings. The visit may include observations of inspections, surveillance responsibilities, and verification of compliance with the MIP. The respective coordinator shall receive a copy of any identified items, concerns, or noted observations in the written report within 45 days after the closing meetings.

7.5 Continued Confidence of Compliance with the U.S.-UK MAG. The FAA and the CAA shall continue to demonstrate effective surveillance according to the agreed procedures defined in the U.S.-UK MAG. In particular, the FAA and the CAA shall:

- a. Have the right to participate in each other's quality audits and sampling inspections;
- b. Ensure that regulated entities provide access to the FAA and the CAA for audits and SIS activities;
- c. Make available the reports from quality audits and sampling inspections applicable to the MIP;
- d. Make the appropriate personnel available to participate in the SIS;
- e. Make available the maintenance organization's records and inspection reports, including completed enforcement actions;
- f. Provide interpretive assistance, where necessary, at their office during the review of internal maintenance organization records and documentation;
- g. As applicable, assist each other in the closure of any findings from inspections;
- h. Ensure sampling inspections are risk-based from analysis and objective criteria, without prejudice to the discretionary power of the Authorities.
- i. Notify each other at the earliest opportunity in the event that either the FAA or the

CAA is not able to meet a requirement in the MIP. In the event either the FAA or the CAA believe that technical competency is no longer adequate, the FAA and the CAA shall consult and propose a written action plan, including any necessary rectification activities, in order to address deficiencies identified.

- 1) In the event that the FAA or the CAA believe that technical competency is no longer adequate, the CAA or the FAA may propose to suspend the surveillance and oversight responsibilities. If such a proposal is made, both Authorities shall discuss the reasons for it within 14 days of the date of the proposal with a view outlining how to re-establish mutual confidence.
 - 2) The proposed suspension must be in the form of a written report, outlining the conditions not met in the MIP, and must include a timeframe and recommended corrective actions to enable the suspension to be lifted.
- j. During the periodic meetings specified in paragraph 3.0 of the MIP, address any deficiencies that are not rectified within the timeframe specified in the action plan.

7.6 Technical Consultations and Meetings. To ensure the U.S.-UK MAG remains effective over time, both the FAA and CAA shall consult annually to discuss any issues in the implementation of the MIP and to discuss any enhancements. This will include a discussion of technical issues and the resolution of technical disagreements.

- 7.6.1 Meeting attendees should include the personnel responsible for the technical coordination and policy implementation of this guidance.
- 7.6.2 At the discretion of the joint leadership, staff and representatives of other appropriate organizations may participate.
- 7.6.3 The host is responsible for meeting minutes and tracking action items.
- 7.6.4 Subgroups may participate at the meetings to address specific technical issues and make recommendations or amendments to policy or guidance.
- 7.6.5 The FAA and the CAA shall report a consolidated SIS summary identifying systemic issues and the status of the SIS actions during the meeting.

8.0 SAMPLING INSPECTION SYSTEM (SIS).

8.1 Objective of a SIS. The purpose of SIS inspections is to establish the open communication and continued confidence in the ability to comply with the requirements of the MIP and to ensure consistent application of the U.S.-UK MAG procedures by the FAA, the CAA, and the maintenance organizations. The SIS inspection must focus on the application of Special Conditions. It may also be used to document risk associated with the equivalent regulations that are beyond the scope of the Special Conditions.

- 8.1.1 Both Authorities agree that the SIS process benefits the FAA, the CAA, and

maintenance organizations in understanding the differences between each Authority's regulations, and any procedural differences associated with implementation of the MIP.

- 8.1.2 The FAA and the CAA shall assist each other in gaining unimpeded access to maintenance organizations. If any maintenance organization requires additional security-related information, they will promptly request that the FAA or the CAA provide it. It is incumbent upon the maintenance organization to provide unimpeded access to all work areas maintaining civil aeronautical products.
 - 8.1.3 A consolidated SIS summary identifying systemic issues and the status of closure actions shall be reported by the FAA Coordinator (AFS-300) and the CAA Coordinator to the joint leadership. The report will contain the status of the SIS findings and any recommendations therein. The coordinators' signatures on the SIS forms indicate that they have reviewed the form and understand any findings. The coordinators may add comments to the findings report.
 - 8.1.4 No fees are to be issued to the maintenance organizations for a SIS inspection or any investigations performed.
- 8.2** SIS Team Composition. Each SIS Team should consist of at least two experienced, qualified inspectors/surveyors. Each SIS Team may include an additional inspector/surveyor undergoing team familiarization.
- 8.2.1 The FAA Coordinator (IFO) should be the SIS Team Lead for repair stations located in UK.
 - 8.2.2 The CAA National Coordinator should be the SIS Team Lead for AMOs located in the United States.
 - 8.2.3 It is necessary for the FAA Coordinator or CAA National Coordinator, as appropriate, to accompany the SIS Team during the visit to ensure cooperation and communication in the interpretation or application of maintenance standards or regulations.
 - 8.2.4 It is highly recommended that the in-country (host) inspector/surveyor who is responsible for the repair station/AMO join the SIS Team for the visit.
- 8.3** SIS Team Schedule. The FAA and the CAA Coordinators should notify each other at least 90 days prior to a SIS visit.
- 8.3.1 The use of the appropriate job aid listed in the U.S.-UK MAG, Section A, Appendix 3, will assist in determining confidence in the compliance with the terms of the MIP and U.S.-UK MAG. Upon completion of the visit, provide copies of the job aid to the FAA, the CAA Coordinators, and to the maintenance organizations to carry out any corrective actions.
 - 8.3.2 If the SIS Team's schedule changes, the FAA and the CAA should provide each

other with appropriate notice.

- 8.4** Selection of SIS Sites to Visit. SIS Teams will visit FAA or CAA offices that have surveillance of maintenance organizations operating under the MIP. The following are examples of criteria used when selecting locations and/or maintenance organizations to visit:
- a. Reports of non-compliance by maintenance organizations, occurrences, incidents, or accidents;
 - b. Previous sampling inspections reports that indicate particular concerns;
 - c. Recent changes in manning, growth, downsizing, newly certificated, or other associated risks; and/or
 - d. Internal FAA or CAA risk analysis programs, rotational schedules, or SIS risk decision tools for safety systems analyses.
- 8.5** CAA SIS Audits of AMOs in the United States. The CAA shall rely on the EASA SIS procedures listed in the FAA-EASA MAG, Section A, for AMOs located in the United States approved under EASA Part-145. The CAA may request an EASA SIS report from the FAA at any time, or may conduct a SIS inspection using the FAA-EASA MAG procedures. All certification, renewal, and amendments of the EASA Part-145 approvals in the United States processed in accordance with the MAG between the United States and the EU are acceptable to the CAA.
- 8.6** FAA SIS Inspections in the UK. A SIS inspection is performed at the CAA SARG, and may also be performed at any (UK) Part 145 AMO that holds a 14 CFR part 145 certificate. The FAA Coordinator (AFS-54) shall establish a SIS visit schedule based on risk. AFS-300 must concur with the sampling visit schedule prior to its submission to the CAA.
- 8.6.1** FAA SIS Inspection at the CAA Office. The FAA SIS Team should start the SIS inspection using the “SIS Inspection on CAA” job aid (Section A, Appendix 3). The SIS inspection should focus on the CAA processes, procedures, and surveillance in support of the MIP.
- a. The FAA SIS Team should conduct an in-briefing and out-briefing to the CAA. The briefing will cover the purpose of the SIS, any recent changes in the U.S.-UK MAG, prior lessons learned, and SIS corrective actions procedures. The CAA surveyors with oversight responsibility are encouraged to participate at the briefings.
 - b. The CAA shall provide surveyor training records for review and make available individuals responsible for surveillance.
 - c. The CAA shall provide access to CAA surveillance records, reports, findings, enforcements, and corrective action for AMOs that hold 14 CFR part 145

certificates.

- d. As appropriate and when possible, the CAA should also make available CAA staff to assist the FAA in reviewing the above files.
- e. The FAA SIS Team shall brief the CAA and its management regarding the results of the SIS inspection. The briefing should disclose all identified items. Before leaving, the FAA SIS Team must provide the CAA National Coordinator a signed copy of the completed SIS forms.
- f. The FAA SIS Team Lead shall forward a copy of all signed SIS job aids to the FAA Coordinator (AFS-54).
- g. The CAA shall document and complete the necessary follow-up actions for items listed in the “SIS Inspection on CAA” job aid and provide written correspondence to the FAA Coordinator (IFO) within 90 days of the visit.

NOTE: The CAA should use its internal quality control system to document the findings and corrective actions. Program Tracking and Reporting Subsystem (PTRS) codes 3272/5272 should document the SIS inspection on the CAA with appropriate comments for closure actions.

8.6.2 FAA SIS Inspection at a 14 CFR part 145 Repair Station. The FAA SIS Team may complete SIS inspections by sampling repair stations using the “SIS Inspection on a Repair Station” job aid (Section A, Appendix 3). The FAA SIS Team is to check the achieved standards of (UK) Part 145 regulations and the FAA Special Conditions for equivalence with 14 CFR part 145.

- a. The repair station must take action on all identified items listed on the job aid (SIS Inspection on a Repair Station) and substantiate/report all SIS corrective actions to the CAA surveyor in a timely manner.
- b. The FAA SIS Team and the CAA National Coordinator shall discuss the identified items and agree on a timetable for corrective actions. The corrective action should not exceed 90 days.
- c. A copy of the signed “SIS Inspection on a Repair Station” listing the timeframe for corrective action(s) should be given to the repair station. The repair station must be debriefed to ensure corrective actions are conveyed and understood.
- d. In certain circumstances, and subject to the nature of the finding, the CAA National Coordinator may request to extend the 90-day period. The CAA National Coordinator shall communicate with the FAA Coordinator (IFO) any requests for extensions.
- e. The FAA SIS Team Lead shall forward a copy of all signed “SIS Inspection on a Repair Station” job aids to the FAA Coordinator (AFS-54).

- f. The FAA Principal Inspector (PI) shall enter all identified items recorded on the FAA “SIS Inspection on a Repair Station” job aid into the Safety Assurance System (SAS) as a custom Data Collection Tool (CDT) for that repair station. The FAA PI shall then upload all SIS job aids into SAS and file all supporting paperwork in the office file for the certificate holder.
- g. The CAA shall document and complete the necessary follow-up actions for items listed on the “SIS Inspection on a Repair Station” job aid.
- h. If the repair station fails to correct the identified items, or fails to provide the CAA with an acceptable corrective action plan within 90 days, the CAA may recommend a non-approval to the FAA on the “FAA MIP Audit Report 2” contained in Section C, Appendix 2.
 - 1) The report will be marked as “other” and “SIS corrective actions not acceptable.” Outstanding identified items that are not satisfactorily addressed must be documented on the report.
 - 2) The CAA shall forward the report recommending a non-approval to the FAA Coordinator (IFO) for additional actions.
 - 3) The FAA PI shall take appropriate action as necessary.
- i. Once the corrective actions are acceptable to the CAA surveyor, he or she shall forward the corrective actions with a recommendation to close the SIS on the FAA MIP Audit Report 2 to the FAA Coordinator (IFO). The report will be marked “other” and “SIS corrective actions or a correction action plan submitted is acceptable.”

NOTE: Refer to FAA Order 8900.1, Volume 12 for additional guidance regarding conducting a SIS inspection.

8.6.3 FAA SIS Closure Action. A copy of the SIS job aids and corrective actions/accepted corrective action plan must be forwarded to the FAA Coordinator (IFO) within 90 days following the visit.

- a. The FAA SIS Team Lead shall review the corrective actions and, if acceptable, inform the CAA National Coordinator in writing that the corrective action is acceptable to close the SIS.
- b. The SIS Team Lead/SIS Team member or PI shall complete the SAS DCT for the SIS inspection performed at the repair station.
- c. The CAA shall notify the repair station that the FAA SIS corrective actions are acceptable and closed.
- d. The FAA Coordinator (IFO) shall forward a copy of the correspondence documenting FAA acceptance of the corrective actions to the FAA

Coordinator (AFS-54) for closure.

- e. The FAA Coordinator (AFS-54) shall review the closure of the findings and forward a copy of the SIS job aids and correspondence to the FAA Coordinator (AFS-300) for closure.
- f. The FAA Coordinator (AFS-54) shall analyze the results of the SIS inspection and provide a consolidated SIS summary for the previous year to FAA management. The SIS summary will identify any systemic issues, suggested U.S.-UK MAG revisions, and the status of the SIS closure actions during the annual meeting.
- g. AFS-300 shall make any necessary revisions to the U.S.-UK MAG or appropriate changes to training/briefings based on the SIS analysis.

8.7 CAA Classification of Findings. Consistent with the classification of findings developed by the CAA, a Level 1 finding is any significant non-compliance with a (UK) Part 145 requirement that lowers the safety standard and seriously impacts flight safety. A Level 2 finding is a non-compliance with a (UK) Part 145 requirement that could lower the safety standard and possibly impact flight safety.

8.7.1 Level 1 findings require immediate action by the CAA to revoke, limit, or suspend (in whole or in part) the AMO's approval, depending upon the extent of the Level 1 finding, until successful corrective action has been taken by the AMO.

8.7.2 Level 2 findings require a corrective action plan that is appropriate to the nature of the finding, but, in any case initially, must not exceed 3 months. In certain circumstances, and subject to the nature of the finding, the CAA may extend the 3-month period subject to a satisfactory corrective action plan agreed to by the FAA. The CAA shall take action to suspend (in whole or in part) the approval in case of failure to comply within the timescale granted.

8.8 SIS Flow Chart.



9.0 INDEPENDENT INSPECTIONS. In accordance with the MIP, the FAA and the CAA may conduct independent inspections of maintenance organizations when warranted by specific safety concerns. The FAA and the CAA shall coordinate with each other regarding any independent inspections. The FAA and the CAA shall inform each other of the outcome of an independent inspection within 15 days after the inspection.

9.1 Independent Inspection Factors. AFS-300 or the CAA management may request an independent inspection based on the following risk factors:

- a. Specific safety concerns resulting from a SIS inspection;
- b. A safety-related issue, such as an incident, accident, or complaint;
- c. Failure to comply with the MIP;
- d. Downgrade of an International Aviation Safety Assessment (IASA) from a Category 1 to a Category 2; and/or
- e. Any other internal risk decision process that has highlighted a safety concern.

9.2 International Civil Aviation Organization (ICAO) Category. The IASA for the FAA, or the Safety Assessment of Foreign Aircraft (SAFA) for the CAA, determines whether another country's oversight of air carriers that operate, or pursue to operate into another country, or codeshare with a country's air carrier, complies with safety standards established by ICAO. The programs focus on the country's ability to adhere to international aviation standards and recommended practices contained in ICAO annexes. If either Authority has risks identified by failing to meet the aircraft maintenance oversight standards, these risks may affect the MIP or could impose heightened surveillance. The FAA and the CAA shall take actions as listed below:

- a. The FAA (AFS-300) and the CAA SARG Director shall discuss the results and shall conduct a risk assessment and action plan to mitigate any safety concerns. The FAA and CAA may also conduct a joint risk assessment to determine the severity of the downgrade to address any systemic issues.
- b. In the event risks are associated with the continued confidence of either country to implement the MIP, the FAA or the CAA may immediately place applications for initial certifications on hold. They should remain on hold until compliance and risks are mitigated appropriately.
- c. The FAA and the CAA may increase the frequency of surveillance using the SIS inspection procedures.
- d. Depending on the results of the SIS inspections and identified risk imposed on air carriers, the FAA or the CAA may temporarily increase the surveillance frequency or conduct independent inspections to mitigate the risk for certifications, renewals, and amendment of certificates.

10.0 ENFORCEMENT ACTIONS. The FAA and the CAA shall provide, subject to applicable laws and regulations, mutual cooperation and assistance in any investigation or enforcement proceedings of any alleged or suspected violation of any law or regulation under the scope of the MIP. The FAA and the CAA shall inform each other of any enforcement action taken. All enforcement actions taken are subject to regular joint

review. The suspension, revocation, or surrender of a maintenance organization's certificate affects the respective FAA and CAA surveillance and certificate management duties under the MIP. The FAA or the CAA may take actions listed in this paragraph.

- 10.1** 14 CFR part 145 Repair Stations Located in the UK. If a (UK) Part 145 AMO approval is or may be subject to a suspension, revocation, limitation, or surrender, the CAA must immediately notify the FAA. Based on any finding, the CAA shall submit an FAA MIP Audit Report 2 (Section C, Appendix 2) listing the details and nature of the actions. The CAA shall immediately forward the report to the FAA Coordinator (IFO). The FAA Coordinator (IFO) and the CAA Coordinator shall discuss the suspension, revocation, limitation, or surrender and notify the FAA Coordinator (AFS-54).
- a. A repair station surrendering its (UK) Part 145 AMO approval certificate (CAA Form 3) without the intention of surrendering its 14 CFR part 145 certificate no longer meets the requirements of the MIP.
 - b. Upon notification by the CAA of a suspension, or revocation of a (UK) Part 145 AMO approval, the FAA shall open an investigation under the current edition of FAA Order 2150.3, FAA Compliance and Enforcement Program. The FAA shall determine appropriate action for possible non-compliance of regulations affecting U.S.-registered aircraft. Fees per 14 CFR part 187 may not be assessed for FAA enforcement-related expenses.
 - c. Where a CAA finding/discrepancy results in limitations placed on the (UK) Part 145 AMO capabilities, the FAA may investigate any significant safety issues and will take appropriate action.
 - d. Where the CAA takes action against an additional fixed location or line station authorization, then the FAA may investigate any significant safety issues and take appropriate action.
 - e. The FAA PI shall make an entry into SAS and take appropriate action if the 14 CFR § 145.53(b) requirements of the MIP are no longer met based on a (UK) Part 145 AMO suspension, revocation, or surrender.
- 10.2** EASA Part-145 AMOs Located in the United States. EASA Part-145 approval may be suspended or revoked by EASA if the certificate becomes invalid under the conditions specified in Annex 2 of the U.S.-EU Agreement.
- a. Any certificate action involving suspension or revocation will be carried out by EASA in accordance with EASA Part-145.B.35 and applicable EASA procedures.
 - b. If a U.S.-based 14 CFR part 145 repair station with EASA Part-145 AMO approval is subject to a suspension, revocation, or surrender of the FAA certificate, the FAA shall notify the CAA and EASA.

11.0 NON-PAYMENT OF FEES. The FAA or the CAA may suspend or deny any application for certification service in the event of non-payment of required fees until such time the fees are paid.

12.0 APPEALS. A maintenance organization may appeal the suspension or revocation of its certificate. Appeals of FAA enforcement actions are made in accordance with 14 CFR part 13.