

AVIATION COMPONENT SERVICES : NOTES FOR CASA REVIEW COMMITTEE

Harmonisation with EASA Part 145

CASA has revised the regulations for aircraft and aircraft component maintenance to attempt to harmonise with EASA. ACS applied for EASA Part 145 approval in 2008 and after a comprehensive, 6 month audit process ACS obtained approval in December 2008. The EASA auditor spent 4 days at our premises raising our standards to meet EASA requirements, the process was very beneficial and there was a genuine improvement in our procedures.

CASA published the new part 145 regulations in 2011 and it was most apparent CASA had made changes to the EASA regulations which diminished any chance of recognition by EASA and it made it difficult for organisations such as ACS because we require two different Expositions.

CASA even changed the structure for the Exposition despite us being told by the CEO of CASA that this would not happen.

An example of a change is in the requirements for the Exposition (145.A.70) where EASA listed 16 mandatory requirements, CASA added another requirement which stated "any requirement in this MOS that is not set out in the above" i.e. anything else they can think of.

The difference between the approach of CASA and EASA is quite significant. EASA is recognised as the international standard and harmonisation with it is essential if our aviation industry is to be an exporter of maintenance services.

EASA avoids ambiguities and aims to have consistency between auditors. EASA specifies the audit procedures in Part 145B which must be followed by auditors and provides companies with an understanding of the audit process. Part 145B also contains a complete list of forms and check lists. EASA audits every year, lists non-conformances, specifies a deadline for correcting the non-conformances, notifies us closing of the audit and sends a letter confirming continuing validity of our approval. EASA auditors act in a consultative way bringing their world wide experience to improve standards of organisation and introduce world best practices.

EASA publish the Part 145 in one concise document which contains 10 pages of regulations, acceptable means of compliance, guidance material and Part B Procedure for Competent Authority. The only other significant document required is the guidance material for preparation of the exposition.

CASA appears to have adopted a version of Part 145A but not the EASA system that goes with it (essentially Part 145B). The CASA check list for compliance to Part 145 runs to 927 lines (EASA 145B Form 6 is 7 pages). There has been considerable effort involved developing the CASA check list but this is wasted without an EASA style audit policy and system. ACS received CASA Part 145 approval 15 months ago and since then we have had no contact with CASA and we do not even know who is our assigned surveyor.

An isolated approach equals special rules. EASA has considerable resources and has evolved a system which is adopted by 27 EU countries.

Contact George Faulkner 