

**Suggestions on support EASA can provide during & immediately
following the Covid-19 Crisis.**

Submitted to SAB on behalf of the Aviation Working Group

Mark Lynch – Member, Stakeholder Advisory Board

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This report is compiled in response to the invitation by Julia Egerer, EASA Strategy Development Officer to provide to EASA additional suggestions, ideas and inputs that industry might have on how EASA can support aviation in these difficult times.

The Aviation working group (AWG) (www.awg.aero) is a not-for-profit legal entity comprised of major aviation manufacturers, leasing companies and financial institutions that contributes to the development of policies, laws and regulations that facilitate advanced international aviation financing and leasing.

In the immediate aftermath Covid-19 crisis The AWG anticipate a high level of disruption with respect to the normal aircraft leasing cycle. We expect a significant increase in the transfer of aircraft between operators, an increase in the number of non-operating aircraft that are stored or parked by aircraft owners, and multiple changes of aircraft registration. In addition we expect that there will be continued difficulty with travel for Aviation Authority Inspectors, CAMO staff, MRO staff, and lessor representatives that will impact the ability to protect and maintain aircraft as currently expected. Logistics and movement of parts, in addition to the non commercial operation of aircraft for maintenance and storage will be very difficult. The approval of MROs under Part-145 will be in demand as aircraft change registers, while auditing for such approvals will be a challenge. The need for greater off-site audits of records and aircraft status will be required.

Following consultation within the AWG subgroup on Covid-19, we request that the following recommendations are considered by EASA. The aim of these suggestions is to provide a mechanism to temporarily alleviate bottlenecks associated with the crisis and its aftermath, ensuring flexibility within the system, all without compromising the existing high levels of safety within the industry.

Suggestions on support EASA can provide during & immediately following the Covid-19 Crisis.

AIRWORTHINESS

Proposed action: Authorise extension to existing Airworthiness Review Certificates (ARC)

Description of your proposed action: Temporary automatic extension to existing Airworthiness review certificates for 6 months

Who benefits: Allows for continuity of the aircraft C of A for an aircraft already airworthy at the time of this crisis. Avoids Authority or CAMO personnel having to travel during lockdown period.

Proposed timeline for implementation: Valid for any ARC due to expire up to September 30th 2020.

Additional comments:

Proposed action: Desktop Audits and continuation of CAMO / DOA / POA / Part-145 Approvals

Description of your proposed action: In the event that a planned CAMO / DOA / POA / Part-145 audit cannot be conducted in the coming months, recommend that desktop audits are an acceptable temporary replacement for normal full audits/inspections during this period.

Who benefits: Industry and Authority personnel. Allows for business continuity during lockdown period, and avoid a lapse of privilege for regulated organisations during this time.

Proposed timeline for implementation: Valid for any audit due up to September 30th 2020.

Additional comments:

Proposed action: Delegation of aircraft inspections

Description of your proposed action: Temporary authorisation permitting CAMOs to contract local onsite licenced engineers or authorised signatory from alternative local CAMO to carry out physical review of aircraft in support of ARC review. Records review and overall project management of ARC recommendation to remain with assigned CAMO. (EG. UK CAA guidance)

Who benefits: Allows for C of A or Flight Permit activity to take place as required during lockdown period.

Proposed timeline for implementation: Valid for any audit due up to December 31st 2020.

Additional comments:

Proposed action: Recommend National Aviation Authorities to issue C of A & ARC on the basis of the submitted recommendation from a CAMO

Description of your proposed action: NAA to issue C of A and ARC on the basis of the submitted recommendation from a CAMO, without a National Aviation Authority inspector performing an onsite survey of the aircraft

Who benefits: Allows for C of A or Flight Permit activity to take place as required during lockdown period.

Proposed timeline for implementation: Valid for a period up to December 31st 2020.

Additional comments:

Proposed action: Limited use of non EASA approved MRO for ferry flight preparation

Description of your proposed action: Encourage the use of non-EASA Part 145 company approved personnel to sign off maintenance tasks related to ferry an aircraft to a place of maintenance / storage. Note, a provision already exists in Part M to permit such an event.

Who benefits: Allows for maintenance activity in support of aircraft ferry

Proposed timeline for implementation: Valid for a period up to September 30th 2020.

Additional comments:

Proposed action: Limited use of non EASA approved MRO for storage & Return to Service

Description of your proposed action: Where an aircraft is returned to a Lessor, placed on an EU register and under an EASA CAMO, but no EASA Part 145 MRO is available at the aircraft location, then; grant a non EASA Part-145 organisation once off approval (by aircraft S/N) to conduct maintenance including parking / storage and Return to Service task on the aircraft and issue a CRS. This may be limited to maintenance organisation holding approval by the exporting State (previous register). Allows for continuity of maintenance by the same maintenance organisation following a registration change.

Who benefits: Allows for maintenance activity on an aircraft to be maintained in an location without an EASA-145 MRO.

Proposed timeline for implementation: Valid for a period up to December 31st 2020.

Additional comments: Note that registration changes may be forced on an owner by State registration rules.

Proposed action: EASA acceptance of the OEM's Maintenance Clock Stoppage Guidance

Description of your proposed action: EASA to provide guidance and recommendation to each National Aviation Authorities (NAAs) recommending their 'acceptance' of the OEM's Maintenance Clock Stoppage. The post COVID-19 grounding period will be a very busy period for NAAs, and this proposal will provide certainty for CAMOs / lessees / lessors that are trying to utilize the Maintenance Clock Stoppage option.

Who benefits: While the guidance is issued by the OEM it would be helpful to have EASA recommend to NAA to accept it, to avoid different Authorities making different decisions on locally approved AMPs.

Proposed timeline for implementation: Indefinite.

Additional comments:

Proposed action: Authorise and provide guidance on robbery of serviceable components between aircraft at a maintenance facility

Description of your proposed action: With many aircraft in storage simultaneously, it would be very helpful to authorise and provide guidance for the transfer of serviceable components between aircraft on different EU registers in the same maintenance facility, without the need for an overhaul/inspection and issuance of a Form One.

Proposed timeline for implementation: Immediately, in force until April 30th 2021

Additional comments:

Proposed action: Guidance on evaluation programme where an Export C of A is not provided by the Exporting State

Description of your proposed action: EASA to provide guidance on an acceptable evaluation programme detailing the required inspections to compensate for the missing assessment and airworthiness statement by the former State of registry, as envisaged under RMT.0278, but not yet adopted.

Proposed timeline for implementation: Immediately, in force until completion of adoption of RMT.0278

Additional comments:

GENERAL

Proposed action: Quarantine Waivers:

Description of your proposed action: Waivers or exemptions (even if subject to protocol requirements) from 14-day quarantine requirements for essential maintenance and flight crews recovering or re-positioning.

Who benefits? Ability to move aircraft is key to all within the industry. Aircraft could create congestion at airfields for aircraft that need to be moved to be returned to service, for maintenance, or for cargo conversion.

Proposed timeline for implementation: Immediately

Additional comments:

Proposed action: Protocol for accepting documents certified by electronic signature

Description of your proposed action: Requirement for document originals / hardcopies should be waived for a period. A protocol for general Authority acceptance of documents certified by electronic signature rather than original ink, and a protocol for acceptance of PDF or other softcopy submissions should be adopted. This should be applicable to aircraft jobcards, status reports, applications for Certificate of Registration / De-registration and other associated applications.

Who benefits? Everyone, will avoid significant delays in getting hardcopies

Proposed timeline for implementation: Immediate

Additional comments: Allows for the easy transfer of certified documents in lieu of signed originals.

Proposed action: Covid-19 Contingency Related Differences (CCRD) Template:

Description of your proposed action: ICAO is building a database for COVID-19 Contingency-Related Differences in its Electronic Filing of Differences (EFOD) system (<https://www.icao.int/safety/COVID-19OPS/Pages/ccrd.aspx>) to capture differences from ICAO Standards on certification and licensing arising from COVID-19 mitigation efforts. Consider ways EASA could encourage harmonization of CCRDs among EU NAAs and promote same as a template globally.

Who benefits? Industry

Proposed timeline for implementation: Immediately

Additional comments: Promote continued harmonisation while allowing for flexibility in addressing crisis.

Proposed action: Protocols for aircraft disinfection

Description of your proposed action: Publication of acceptable protocol for aircraft disinfection, taking into consideration whether aircraft in operation or stored for longer than C-19 can survive might require a lesser level. In all cases guidance on equipment and cleaning materials short and long term potential corrosion, health issues via cabin air, and impact on cabin materials (e.g., seat leather/cloth)

Who benefits? Allows for harmonisation of process, rather than reliant on individual authority requirements

Proposed timeline for implementation: Immediately

Additional comments: