

NPA/25/47

Title of Proposal: General Requirements (MRP Part 145), Findings and Observations

RA(s) or Manual Chapter(s): RA 4800, RA4821

Organizations and / or business sectors affected: MRP Pt 145 – MMOs + AMOs

RFC Serial No: MAA_RFC_2024_100, MAA_RFC_2024_028, MAA_RFC_2024_195, MAA_RFC_2024_037, MAA_RFC_2020_171

MAA Author

Post	Name	Rank	Signature
Redacted	Redacted	Redacted	Redacted - Original Signed

MAA Supervisor

Post	Name	Rank	Signature
Redacted	Redacted	Redacted	Redacted - Original Signed

MAA Independent

Post	Name	Rank	Signature
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MAA LegAd (if required)

Post	Name	Rank	Signature
N/A	N/A	N/A	N/A

Cross-references to Other Documents or Relevant Sources

Other MRP Amendments: N/A

Service Inquiry Recommendations: N/A

AAIB Recommendations: N/A

Other Investigation Recommendations: N/A

Any Other Document: N/A

Feedback Notes for the Regulated Community

The Regulated Community are invited to offer feedback about the proposed amendment in the following areas:

- Air or Flight Safety impact
- Operational impact
- Errors or omissions

- Timescale for implementation
- Cost of implementation
- Amendment to internal processes/orders
- Resourcing the outcome of change
- (Contract amendments because of the change)

The format for feedback is available within a single Excel Template file on both internal and external MAA websites; it is important to use this format to ensure that your responses are considered and answered correctly.

Summary of Proposed Amendment

Objective: Implementation of RFCs, alignment with CAA Regulations and Quinquennial Reviews where applicable to maintain currency of the RA's.

Changes made: RA 4800 – Document restructured to clarify applicability to MMOs / AMOs but with no significant change to intent. Amended to align with updates to RA1005 – Contracting with Competent Organizations. Standardised definitions of Tradesperson, Supervisor, Coordinating / Certifying Staff for the 4800 Series RAs. Amendments to incorporate Part 145 elements of Aircraft Cross Maintenance (ACM) – MAA/RI/2025/04.

RA 4821 – Increased scope of applicability to include MMOs. Addition of Corrective Actions and Observations. Added Guidance Material regarding Root Cause Analysis.

Impact Assessment: Minimal perceived impact to affected Organizations.

Consultation Period Ends: 6 Weeks

The consultation period for this proposed amendment ends on the stated date. Please send your feedback, using the Response Form, via email to DSA-MAA-MRPEnquiries@mod.gov.uk

MAA Approval

Post	Name	Rank	Signature
Redacted	Redacted	Redacted	Redacted - Original Signed

► This RA has been substantially re-written; for clarity no change marks are presented – please read RA in its entirety ◀

RA 4800 – General Requirements (MRP Part 145)

Rationale

MRP Part 145 consists of discrete Regulatory Articles (RAs)¹ that govern Maintenance organizations. This RA outlines the fundamental requirements for Maintenance organizations and where they apply to the Maintenance Approved Organization Scheme (MAOS). Contracting with a Maintenance organization without an assessment of the Maintenance organization's Competence could lead to Maintenance errors and increased Risk to Life. An organization's achievement of the outcomes expressed in MRP Part 145 demonstrates a level of Competence that reduces the likelihood of Maintenance errors and contributes towards Aviation Duty Holder and Accountable Manager (Military Flying) Assurance of the Airworthiness of military registered Air Systems and components.

Contents

Definitions Relevant to RA 4800 – 4849 (MRP Pt 145) Series

4800(1): General Requirements (MRP Part 145)

4800(2): Distribution of Approved Maintenance Organization Exposition and Supplement Documents

Definitions

Definitions Relevant to RA 4800 – 4849 (MRP Pt 145) Series

1. **Tradesperson.** Competent and Authorized staff² responsible for executing Air System and Air System component Maintenance activities. This role may also be known as Support Staff within Approved Maintenance Organizations (AMOs), or 1st Signature within Military Maintenance Organizations (MMOs).
2. **Supervisor.** Competent and Authorized staff² responsible for carrying out supervision of Tradespersons in the execution of their Maintenance activities. This role may also be known as Support Staff with supervisory responsibilities within AMOs, or 2nd Signature within MMOs.
3. **Coordinating / Certifying Staff.** Competent and Authorized staff^{2,3} holding Authorization within the Maintenance organization to endorse the appropriate Certification of Air System Release and / or Component Release⁴ (Air System coordination / Work Order coordination). This role may also be known as the 3rd Signature within MMOs.

Note:

"Certifying Staff" must not be confused with the term "certifying staff" used uncapitalised; "certifying staff" is the collective noun for Maintenance personnel with responsibilities for signing Maintenance documentation as either Tradesperson, Supervisor or Coordinating / Certifying Staff.

Regulation 4800(1)

General Requirements (MRP Part 145)

- 4800(1) Air System Maintenance⁵ **shall** only be carried out by organizations whose management, technical resources and Quality Assurance arrangements are demonstrably fit for purpose to provide products and services of the required Quality, economically and on time.

¹ Refer to the RA 4800 - 4849 (MRP Part 145) series.

² Refer to RA 4807 – Certifying Staff and Support Staff (MRP 145.A.35).

³ Refer to RA 4801(1): Certifying Staff.

⁴ Refer to RA 4812 – Certification of Air System Release and Component Release (MRP 145.A.50).

⁵ For the purposes of this RA, Air System Maintenance refers to Air Systems (including their Products, Parts and Appliances), Airborne Equipment and Air Launched Weapons.

Acceptable Means of Compliance 4800(1)

General Requirements (MRP Part 145)

Common AMC

4. **Aircraft Cross Maintenance (ACM).** Air System Maintenance⁵ conducted by a Maintenance organization from another nation **should** only be undertaken by organizations whose National Military Airworthiness Authority is formally Recognised⁶ by the UK Military Aviation Authority (MAA) with a current Recognition Certificate. ACM **should** be undertaken in accordance with (iaw) the Recognition Implementing Arrangement (RIA) and associated Technical Annexes for the partner nation. However, providing a current Recognition Certificate is in place, Commands may negotiate ACM agreements appropriate to their operational commitments pending issuance of an RIA.

Additional AMC – MMOs only

5. A military-run organization does not require a MAOS Approval to conduct Air System Maintenance⁵, but its compliance with the relevant parts of MRP Part 145 **should** be assured under single-Service arrangements. In addition, some 3rd party Assurance activity will be conducted by the MAA as part of existing Audit arrangements.

Additional AMC – AMOs only

6. A Contractor-run organization executing Maintenance activities as defined in RA 1005(3)⁷, **should** apply for the issue or continuation of an Approval for the Maintenance of military registered Air Systems⁵ through the MAOS, iaw MRP Part 145, or, where applicable, the MRP Part 145 Supplement - Requirements Document (S-RD) at Annex A.

7. A Contractor-run Maintenance organization holding a UK Civil Aviation Authority (CAA) Part 145 Approval **should** apply for an MAA Approval through the MRP Part 145 S-RD process detailed in Annex A to this Regulation. This process **should** only be used by those organizations meeting the qualifying criteria and conditions contained within this document and when agreed by the MAA.

Guidance Material 4800(1)

General Requirements (MRP Part 145)

Common GM

Applicability

8. MRP Part 145 must be read in conjunction with MAA01⁸ and this RA must be read in association with RA 1005⁹. MRP Part 145 forms part of the wider Continuing Airworthiness (CAw) Engineering 4000 Series RAs that govern CAw activity. As such, these Regulations have applicability to military-run Air System Maintenance⁵ organizations; these organizations will be referred to throughout MRP Part 145 as MMOs. The applicability of the RA 4800 series to MMOs and AMOs is summarized in table 1.

Table 1. MRP Part 145 Applicability

RAs	MMO Applicability	AMO Applicability
RA 4800 - 4801	Yes	Yes
RA 4802 - 4804	No	Yes
RA 4805 - 4815	Yes	Yes
RA 4816	No	Yes
RA 4817	Yes	Yes
RA 4818 - 4820	No	Yes
RA 4821	Yes	Yes

⁶ Recognition is the process used to evaluate other military aviation regulators and assess the potential to use their Airworthiness outputs within MAA processes, see [MAA Recognition](#).

⁷ Refer to RA 1005(3): Maintenance Organizations.

⁸ Refer to MAA01: MAA Regulatory Principles.

⁹ Refer to RA 1005 – Contracting with Competent Organizations.

Guidance Material 4800(1)

9. The scale of a Maintenance organization may vary depending on the organizational construct within which it is located. Maintenance organizations may conduct Maintenance in the forward domain, the depth domain, or both, and it is possible that several Maintenance organizations may be located at the same Unit or MOD site.

10. Work undertaken in support of defined Maintenance packages and / or Modification programmes at a Maintenance organization where such work is not undertaken under its control¹⁰ would be regarded as "Contractor-run" Maintenance and hence an organization undertaking such work will require Approval under MRP Part 145 and be considered as a separate AMO.

11. RAs within MRP Part 145 detail Acceptable Means of Compliance (AMC) and / or Guidance Material (GM) that is applicable to either MMOs only, AMOs only, or both. Where necessary, AMC / GM has been split under the following 3 headings: 'Common AMC / GM', 'Additional AMC / GM - MMOs only' and 'Additional AMC / GM - AMOs only'. 'Common AMC' is equally applicable to both MMOs and AMOs; 'Additional AMC – MMOs / AMOs only' is applicable to either an MMO or AMO respectively. It is not permissible for AMOs to follow the 'MMOs only' AMC in lieu of the AMO only AMC, or vice-versa, without specific Approval from the MAA to do so. Where no such headings exist, the entire AMC / GM relating to that sub-RA is applicable to both MMOs and AMOs.

Terminology

12. The MRP Part 145 has been derived primarily from civilian European Aviation Safety Agency (EASA) Part 145 Regulations and as such many of the terminologies used in the MRP are civilian aviation terms. These terms include 'certifying staff', 'support staff' and various colloquial terms for Air System engineering personnel. In some cases, the civilian aviation term of 'support staff', referring to the tradespersons carrying out Maintenance activities, has been confused with administrative support personnel. The collective noun, certifying staff, has previously been confused with Certifying Staff who are Authorized to endorse the appropriate Certification of Air System Release and / or Component Release. Therefore, the language utilized throughout the MRP Part 145 has been standardized.

13. Clarifying definitions of these terms have been included at the start of this RA and are applicable throughout the RA 4800 - 4849 (Part 145) Series.

Warning

14. The MOD, like its Contractors, is subject to UK Health, Safety and Environmental Protection law. All Defence Standards and RAs either directly or indirectly invoke the use of processes and procedures that could be injurious to health or the environment if adequate precautions are not taken. CAW Engineering 4000 Series RAs or their use in no way absolves users from complying with statutory and legal requirements relating to Health, Safety and Environmental Protection.

Additional GM – MMOs only

15. Nil.

Additional GM – AMOs only

16. MRP Part 145 (RA 4800 – 4849) provides the Regulation to be met by Contractor-run Maintenance organizations to qualify for the Approval required by this Regulation and RA 1005⁹ for military registered Air Systems⁵ Maintenance. Organizations obtaining such Approval will be referred to throughout MRP Part 145 as AMOs.

17. While MRP Part 145 establishes the requirements to be met by a Contractor-run Maintenance organization to qualify for the issue or continuation of an MAA Approval through MAOS, it does not negate the requirement for such an organization to adhere to other applicable Regulations (as Contracted) within the MAA Regulatory

¹⁰ The phrase "not undertaken under its control" is meant as those activities not undertaken as part of work force substitution activity for which the Accountable Manager (Maintenance) (AM(M)) retains the power to authorize personnel as Coordinating / Certifying Staff, Tradespersons or Supervisors. Examples are Modification programmes or Preventive Maintenance packages undertaken by a Contractor Working Party.

**Guidance
Material
4800(1)**

Publications (MRP). Each RA will be considered for applicability. Such Regulations include, but are not limited to, those in the General 1000 Series. The AMC for these Regulations may refer to MMO specific terms; AMO specific equivalent terms may be used instead but the AMO's means of meeting the Regulation will be demonstrably no less safe than the requirements of the AMC and will be detailed in the organization's Maintenance Organization Exposition (MOE).

Application for MAOS MRP Part 145 Approval

18. A Contracted organization applying for the issue or continuation of a MAOS Approval will apply to the MAA by email to DSA-MAA-OA-ACC@mod.gov.uk.

**Regulation
4800(2)****Distribution of Approved Maintenance Organization Exposition and Supplement Documents**

4800(2) AMOs **shall** provide the Type Airworthiness Authority (TAA)¹¹ and the Military Continuing Airworthiness Manager (Mil CAM) an extant copy of the organization's Approved MOE and supplement¹².

**Acceptable
Means of
Compliance
4800(2)****Distribution of Approved Maintenance Organization Exposition and Supplement Documents**

19. Following Approval of the supplement the AMO **should** distribute an up to date copy of the organization's Approved MOE and supplement to the TAA and Mil CAM within 10 working days.

**Guidance
Material
4800(2)****Distribution of Approved Maintenance Organization Exposition and Supplement Documents**

20. Distribution of the organization's MOE and supplement ensures the TAA and Mil CAM are aware of the scope of an AMO's Approval and their procedures to meet the requirements set by the RA 4800 - 4849 (MRP Part 145) series of Regulations.

21. Where there are Commercial in Confidence considerations the AMO may provide a redacted copy to protect its commercial interests.

¹¹ Where the Air System is not UK MOD-owned, Type Airworthiness (TAW) management regulatory responsibility by either the TAA or Type Airworthiness Manager (TAM) needs to be agreed within the Sponsor's Approved model; refer to RA 1162 – Air Safety Governance Arrangements for Civilian Operated (Development) and (In-Service) Air Systems, or refer to RA 1163 – Air Safety Governance Arrangements for Special Case Flying Air Systems. Dependent on the agreed delegation of TAW responsibilities TAM may be read in place of TAA as appropriate throughout this RA.

¹² Reference to "MOE and supplement" throughout RA 4800(2) is to be read as referring to the documents as applicable to the particular Maintenance Organization, ie MOE only to AMOs without CAA Approvals who have a full MRP MOE Approval and have not used the supplement process.

Annex A to RA 4800

MRP Part 145 Supplement - Requirements Document (S-RD)

1. This document details a simplified process for a Maintenance Organization Approved iaw the UK CAA's Part 145 Approval process to qualify for an Approval iaw MRP Part 145 under the MAOS.
2. An MRP Part 145 Approval issued through the method detailed in this document is an alternative to the organization demonstrating compliance with MRP Part 145 as a whole; its use will be limited to those organizations who meet the qualifying criteria and conditions set out in Section 1 below.
3. The MAA has assessed the requirements of CAA Part 145 against those of MRP Part 145 and established the substantial degree to which MRP Part 145 compliance can be demonstrated by virtue of holding a current CAA Part 145 Approval of an applicable scope. However, where the MRP Part 145 contains requirements that may not be met by the organization through its CAA Part 145 Approval, demonstration of compliance will be necessary to gain an MRP Part 145 Approval; these additional requirements are detailed in Section 2 of this document. Therefore, subject to meeting the qualifying criteria and conditions in Section 1, a Maintenance organization Approved by the UK CAA under CAA Part 145 may apply for the issue of an MRP Part 145 Approval by submitting an MRP Part 145 supplement (hereafter referred to as the 'supplement') that details how these additional requirements are met. Hence, the organization is not required to duplicate effort in re-justifying how it meets the requirements common with CAA Part 145.
4. The MRP is applicable¹³ to CAw Engineering activities associated with Air Systems⁵ on the UK Military Aircraft Register. Therefore, while the MAA's acceptance of an organization's supplement will provide an Exemption from the need to comply with MRP Part 145, it does not remove the need for an organization to comply with any other applicable areas of the MRP.

Section 1 - Qualifying Criteria and Conditions

5. An organization may use the process in this document to apply for an MRP Part 145 Approval subject to meeting the following criteria:
 - a. The organization **should** demonstrate the need for an MRP Part 145 Approval (eg a Contracted requirement to maintain UK military registered Air Systems).
 - b. The organization **should** hold a valid CAA Part 145 Approval certificate, issued by the CAA iaw the current CAA Part 145, covering all applicable Approval classes and ratings, and at the locations that require an MRP Part 145 Approval.
 - c. The organization **should** meet the conditions of Civil Air Publication (CAP) 562 - Book 1, Chapter B, Leaflet B-40 (hereinafter referred to as Leaflet B-40).
6. Prior to submission of the supplement, the organization **should** confirm that it will comply with the following requirements:
 - a. Allow the MAA to inspect the organization for initial and continued compliance with procedures and standards relating to the Maintenance of military registered Air Systems and to investigate specific problems¹⁴.
 - b. Cooperate with the relevant Mil CAM, and their Authorized representatives, so that the Mil CAM can discharge their responsibilities for the CAw of relevant military registered Air Systems iaw the RA 4900 series (MRP Part M). While the Mil CAM may rely on the CAA Continuing Airworthiness Management Organization (CAMO) organization to undertake much of the CAw management activity on their behalf, the Maintenance organization **should** permit the Mil CAM (and their Authorized representatives) full access to those areas of the organization involved in the Maintenance of military registered Air Systems, when deemed necessary by the Mil CAM.
 - c. Cooperate with the relevant MOD TAA, and their Authorized representatives, so that they can effectively manage the Type Airworthiness¹⁵ of relevant military registered Air Systems.
 - d. Accept that investigation and Enforcement Action¹⁶ may be taken by the MAA iaw the Regulations and procedures contained within the MRP.

¹³ Refer to [MAA01: MAA Regulatory Principles](#).

¹⁴ While the principle of this document is that the MAA will utilize the evidence of the CAA Part 145 Approval to confirm compliance with elements of MRP Part 145, the MAA will retain the right to inspect the organization if deemed necessary.

¹⁵ Refer to RA 1015 – Type Airworthiness Management - Roles and Responsibilities.

¹⁶ The MAA's Enforcement policy is detailed in [MAA01: MAA Regulatory Principles](#).

- e. Cooperate with any MAA investigation or Enforcement Action.

7. Notwithstanding the qualifying criteria and conditions detailed here, the MAA may, in exceptional circumstances, require a Maintenance organization to submit a full MRP Part 145 MOE, iaw MRP Part 145, before an MRP Part 145 Approval is granted. This is detailed further in Appendix 1.

Section 2 - Additional Requirements Applicable to Maintenance Organizations Approved Under CAA Part 145

General requirements

8. The MAA agrees that a Maintenance organization that meets the qualification criteria and conditions of Section 1 will be eligible for an MRP Part 145 Approval once the MAA is satisfied that the requirements of this document have been met. To achieve this Approval, the organization **should** complete a supplement and submit it to the MAA iaw Appendix 1.

9. Since an MRP Part 145 Approval granted in this manner is largely based on the CAA Part 145 Approval held, the current Approved, CAA Part 145 MOE **should** be submitted to the MAA¹⁷ together with the completed supplement, iaw Appendix 1. However, where the procedures detailed within the MOE are deviated from or expanded when used on military registered Air Systems and its components, the supplement **should** highlight this and the revised procedures **should** be detailed. Similarly, where the CAA Part 145 MOE details Alternative Means of Compliance to CAA Part 145, then this **should** also be highlighted.

10. Where content required in the supplement is contained within the Approved CAA Part 145 MOE, it is not necessary to reproduce the content. Rather, the content **should** be identified in the supplement by referencing the corresponding part of the MOE.

11. Likewise, where the supplement requirement is not applicable to the organization's scope of work (eg where the Air System being maintained does not have 'military Role Equipment' fitted), a statement to that effect **should** be included in the relevant section of the supplement.

12. The MRP Part 145 Approval will not exceed the scope of the ratings and limitations contained in the CAA Part 145 Approval certificate.

13. The supplement **should** detail the locations at which the MRP Part 145 Approval will be exercised.

14. The supplement **should** be amended as necessary to remain an up-to-date description of the organization. The organization **should** specify a process for submitting amendments in their supplement and identify who within the organization is responsible for amendment action. The supplement and any subsequent amendment **should** be Approved by the MAA, unless such amendment is deemed a 'minor amendment', as follows:

- a. The process for incorporating minor amendments **should** be detailed in the supplement.
- b. The process for minor amendments, if required, **should** define the type of amendments to which it may be applied¹⁸. This may be aligned with the type of amendments deemed a minor amendment in the CAA Part 145 MOE¹⁹.

15. An organization Approved under MRP Part 145 is subject to the privileges and limitations detailed in the applicable Regulations²⁰ with respect to the Maintenance of UK military registered Air Systems.

Facility Requirements

16. The organization **should** detail within the supplement the appropriate safeguards and control measures in place for classified items.

Personnel requirements

17. The supplement **should** contain a statement by the Accountable Manager of the organization, who **should** be the same individual nominated iaw CAA Part 145.A.30(a), which commits the organization to compliance with CAA Part 145 and the conditions and requirements of this Annex whilst operating under their MRP Part 145 Approval. This **should** include acknowledgement of the consequences of failing to meet these requirements.

¹⁷ If necessary, the MOE may be redacted to remove any elements that do not relate to the Maintenance of military registered Air Systems.

¹⁸ Examples of minor amendments may include: correcting typographical errors; renumbering of procedures, provided that the intent of the procedure has not changed; editorial changes to procedures, provided that the intent of the procedure has not changed; and changes to named individuals within procedures, excluding those individuals that are required to hold a CAA Form SRG1769.

¹⁹ Refer to CAA Part 145.A.70(c) – Maintenance Organisation Exposition.

²⁰ Refer to RA 4817 – Privileges of the Organization (MRP 145.A.75) and RA 4818 - Limitations on the Organization (MRP 145.A.80) - Approved Maintenance Organizations only.

- a. The statement by the Accountable Manager **should** embrace the intent of the following statement which may be used without amendment, but any changes **should not** alter the intent:

*The CAA Part 145 MOE, MRP Part 145 supplement and any associated referenced manuals defines the organization and procedures upon which the MRP Part 145 Approval is based, as required by the MAA Part 145 Supplement - Requirements Document. These procedures are Approved by the undersigned and **should** be complied with, as applicable, when work / orders are being progressed under the terms of the MRP Part 145 Approval.*

It is accepted that these procedures do not override the necessity of complying with any new or amended Regulation / instruction published by the MAA or the CAA from time to time where these new or amended Regulations / instructions conflict with the procedures contained within this supplement and the CAA Part 145 MOE.

It is understood that the MAA will Approve this organization whilst the MAA is satisfied that the procedures are being followed and work standards maintained, and that this organization retains its CAA Part 145 Approval certificate for the corresponding Approval class and ratings. It is further understood that the MAA reserves the right to suspend, limit or revoke the Approval of the organization if the MAA believes that procedures are not being followed, or standards are not being upheld.

.....Signed

Name.....[print name in block capitals].....

Dated.....

Accountable Manager and[quote position].....

For and on behalf of.....[quote organization's name].....

- b. Whenever the Accountable Manager changes, the new Accountable Manager **should** sign the statement detailed above (or alternative) at the earliest opportunity. Failure to carry out this action could invalidate the MRP Part 145 Approval.
- c. When the Accountable Manager Maintenance (AM(M)) is not the Chief Executive Officer (CEO) of the organization, evidence **should** be provided ensuring AM(M) has sufficient funding to meet the scope of the Approval contained in the MOE.
18. The organization **should** identify the person or group of people responsible for the organization's compliance with this document²¹. Such person(s) **should** ultimately be responsible to the Accountable Manager. These **should** be the relevant individuals nominated iaw CAA 145.A.30(b) and the nominated individuals **should** have a working knowledge of the relevant parts of the MRP, including this document.
19. The organization **should** ensure that Coordinating / Certifying Staff, Tradespersons and Supervisors have an adequate understanding of the contents of the supplement. In the case of Coordinating / Certifying Staff, this **should** be accomplished before the issue or re-issue of the Certification Authorization.

Release Statement

20. The supplement **should** contain the procedure for the Certification of Air System Release (also known as the 'Certificate of Release to Service') of a military registered Air System, which meets MRP requirements²², noting the following:

- a. The detailed procedure **should** contain the release statement that will be used. Organizations completing a supplement (and hence meeting the qualifying conditions and criteria of Section 1) may use an alternative release statement to that required, provided that:
- (1) This statement declares that the Maintenance has been performed to the standard accepted by the MAA; and
 - (2) The statement differentiates itself from a CAA Part 145 release statement for an Air System with a CAA Certificate of Airworthiness. An example Release To Service statement that is acceptable to both the MAA and the UK CAA is contained in Leaflet B-40.

²¹ The MAA does not intend to conduct interviews with any of these individuals. Rather, where the individual is the holder of a CAA Form SRG1769, this fact will be taken as evidence of the individual's Competence and suitability to hold this appointment.

²² Refer to RA 4812(1): Certification of Air System Release (MRP 145.A.50(a)).

- b. Reference to MRP 145.A.45²³ may be taken to mean a reference to CAA Part 145.A.45, subject to the additional requirements of Approved Maintenance data listed at paragraph 28 of this document.

Coordinating / Certifying Staff, Tradespersons and Supervisors

21. Where applicable, the personnel records established through CAA 145.A.35(j) **should** record the individual's security clearance.
22. Where necessary, the process for granting military Aircrew Maintenance certifying Authorizations²⁴ **should** be detailed in the supplement. This process **should** state the qualifying criterion used and the scope of Authorizations permitted.
23. Where not detailed within the MOE the organization **should** specify procedures within the supplement for assessing all prospective and current Coordinating / Certifying Staff for their Competence, qualification and capability to carry out their intended certifying duties prior to the issue or re-issue of a Certification Authorization.

Equipment, Tools and Material

24. The organization **should** state the procedures for the control of any equipment, tool or material used on an Air System or component.
25. The process for the control of tools, equipment and test equipment **should** ensure that the Air System or Air System component is clear of all tools and equipment on completion of any Maintenance or servicing activity, as required²⁵ by MRP Part 145. If this element of the process is not detailed in the CAA Part 145 MOE, the process **should** be detailed in the supplement.

Military Role Equipment

26. Any specific 'military Role Equipment' fitted to the Air System²⁶, **should** be controlled and maintained iaw procedures detailed in the supplement. This **should** include a procedure for the acceptance, storage and provisioning of 'military Role Equipment' parts, which **should** include content to demonstrate compliance with MRP requirements²⁷.
27. Where 'military Role Equipment' is present, Coordinating / Certifying Staff, Tradespersons and Supervisors **should** have an adequate understanding of such equipment to be maintained and the associated organizational procedures for maintaining it. Procedures **should** be detailed in the supplement to state how staff will achieve this requirement, which **should** include the need to expand relevant continuation training (as required by CAA 145.A.35) where necessary.

Approved Maintenance Data

28. To reflect the differing sources of 'Approved' Maintenance data in MRP Part 145 and CAA Part 145, the supplement **should** include the following:
- a. A procedure to ensure that the organization holds and uses Maintenance data²⁸ and to ensure that the use of such data has been Approved by the relevant TAA.
 - b. A procedure for modifying Maintenance instructions iaw the MRP requirements²⁹.
 - c. Where MOD-sponsored publications are used:
 - (1) A procedure for notifying the MOD publication sponsor of Maintenance data inaccuracies³⁰.

²³ Refer to RA 4810 – Technical Information (MRP 145.A.45).

²⁴ Refer to RA 2211 – Authorization of Aircrew to Carry Out Maintenance Tasks.

²⁵ Refer to RA 4808 – Equipment, Tools and Material (MRP 145.A.40).

²⁶ Leaflet B-40 defines 'military Role Equipment' as those elements of an Air System Modification that cannot be Approved by CAA due to its nature and military security requirements.

²⁷ Refer to RA 4809(1): Component Classification and Documentation (MRP 145.A.42(a)) and RA 4809(2): Suitability of Components (MRP 145.A.42(b)).

²⁸ Refer to RA 4810(1): Use of Approved and Current Technical Information (MRP 145.A.45(a)) and RA 4810(2): Scope of Applicable Technical Information (MRP 145.A.45(b)).

²⁹ Refer to RA 4810(4): Modification of Technical Information (MRP 145.A.45(d)). Due to the very nature of the Air System lease arrangements with the MOD, an organization maintaining Military Registered Civil-Owned Air Systems will normally be required to hold both an MRP Part 145 and CAA Part 145 Approval. As such, any deviation from Approved Technical Information must only be done following Approval from the TAA, who will establish any financial implications that such deviation may have to the MOD, prior to the deviation being Authorized.

³⁰ Refer to RA 4810(3): Requirements to Inform Technical Information Author of Errors (MRP 145.A.45(c)).

- (2) A procedure for checking that all publication amendments are being received and incorporated³¹.

Technical Information

29. Where TAA-issued Special Instructions (Technical) (SI(T)s)³² are applicable³³, the supplement **should** detail procedures for the organization to:

- a. Ensure completeness of, and compliance with, relevant SI(T)s.
- b. Hold a copy of all SI(T)s that the TAA and Mil CAM requires them to comply with.
- c. Ensure that prior to the installation of a component it is eligible to be fitted when different SI(T) standards may be applicable; this is in addition to the requirements of CAA 145.A.42(b).

Maintenance Records

30. The organizations records retention period **should** be set to that instructed by the TAA, and where an AMO terminates its operation, all retained Maintenance records **should** be transferred to the relevant Military Continuing Airworthiness Management Organization (Mil CAMO).

Occurrence reporting

31. The organization **should** report to the MOD any condition of the Air System or Air System component identified by the organization that has resulted or may result in an Unsafe Condition that is a Hazard to Flight Safety. The supplement **should** detail its procedures for such reporting to the MAA, TAA, Mil CAM and broader MOD, as required. Procedures **should** state how the organization will manage Occurrence reporting³⁴. The supplement **should** reference a link to the organization's Safety Management System (SMS).

Good Maintenance Practices

32. The organization **should** detail within the supplement procedures to minimize the Risk of multiple errors and to capture errors on critical Systems. In particular, the organization **should** detail procedures to ensure that no one person is required to self-supervise a Maintenance task that involves some element of disassembly / reassembly and then repeat that same Maintenance task on identical or similar Systems on the same Air System.

33. By exception, when only one person is available to carry out these tasks, then the organization's work card or work sheet **should** include an additional stage for re-inspection of the work by this person after completion of all the same tasks.

Quality Management System

34. The organization's Audit plan, as established through CAA 145.A.200(a) – Management System **should** be expanded to encompass the additional procedures detailed in the supplement.

Appendix:

1. MRP Part 145 Supplement - Approval Processes.

³¹ Refer to RA 4810(7): Maintaining the Amendment State of Technical Information (MRP 145.A.45(g)).

³² Refer to RA 5405 – Special Instructions (Technical).

³³ It is acknowledged that, subject to MAA agreement, the TAA may sanction the use of civil instructions (eg Airworthiness Directives) in place of SI(T)s as part of the platform's Airworthiness Strategy. However, **should** any 'military role equipment' used on the Air System be subject to SI(T)s, compliance will need to be demonstrated.

³⁴ Refer to RA 1410 – Occurrence Reporting and Management.

Appendix 1 to Annex A to RA 4800
MRP Part 145 Supplement - Approval Processes

Application for MRP Part 145 Approval**Applicant actions**

1. An application for the issue or variation of an MRP Part 145 Approval **should** be submitted to DSA-MAA-OA-ACC@mod.gov.uk on a MAA MAOS Form 2³⁵. In submitting the Form 2, the organization **should**:
 - a. Demonstrate the need for an MRP Part 145 Approval (eg a Contracted requirement to maintain UK military registered Air Systems).
 - b. Ensure that the application does not exceed the scope of the ratings and limitations contained in the CAA Part 145 Approval certificate³⁶.
 - c. State their request to gain an Approval by submitting a completed supplement to the organization's Approved CAA Part 145 MOE, in place of a full MRP Part 145 MOE.
2. Once the MAA has confirmed that the organization may apply for MRP Part 145 Approval by submitting a supplement, the organization **should** complete a supplement for assessment by the MAA.
3. The completed supplement **should** be submitted to DSA-MAA-OA-ACC@mod.gov.uk, together with the current CAA Part 145 MOE and the latest CAA Audit Report.

MAA actions

4. On receipt of the MAA MAOS Form 2, the MAA will assess the organization's need for Approval and the required level of MAA Assurance:
 - a. In those instances where the MAA assesses that there is sufficient CAA oversight of the activities undertaken (less the additional requirements detailed in this document), the organization will be informed that they may complete a supplement to apply for MRP Part 145 Approval.
 - b. Exceptionally, where the MAA assesses that completion of a supplement will not be either appropriate or sufficient for the organization to demonstrate compliance with the additional requirements of MRP Part 145, the MAA will instruct the organization to demonstrate full MRP Part 145 compliance through the submission of an MRP Part 145 MOE. In such instances, the following **should** be noted:
 - (1) The provisions of Exemptions³⁷ to the content of an MOE due to holding a CAA Part 145 Approval may still be applied.
 - (2) In compiling the MRP Part 145 MOE, the organization **should** highlight to the relevant TAA any areas where MRP compliance may invalidate their CAA Part 145 Approval. Where this is the case, an application for a Regulatory Alternative Acceptable Means of Compliance, Waiver or Exemption, as appropriate, may be submitted to the MAA for consideration³⁸.
5. When satisfied that the conditions of MRP Part 145 have been met through assessing the supplement and, where necessary, conducting an Approval visit to the organization, the MAA will issue an MRP Part 145 Approval certificate to the Maintenance organization.

Continuation of MRP Part 145 Approval

6. The MRP Part 145 Approval is issued for an unlimited duration, noting the limitation detailed in paragraph 16 of this Appendix. It **should** remain valid subject to:
 - a. The organization remaining in compliance with the supplement; and
 - b. The MAA and / or their Authorized representatives being granted access to the organization to determine continued compliance with the supplement; and

³⁵ The MAA MAOS Form 2 is available on the [MAA Website](#).

³⁶ It is not necessary for the application to cover all B and C Ratings held under the CAA Part 145 Approval if such ratings are outside the scope of the Maintenance Approved Organization Scheme. This scope is detailed in RA 1005 – Contracting with Competent Organizations.

³⁷ Refer to RA 4816(4): Exemption to Content of Maintenance Organization Exposition due to Civil Aviation Authority Part 145 Approval (MRP 145.A.70(d)).

³⁸ Refer to MAA03: MAA Regulatory Process.

- c. The organization continuing to hold a valid CAA Part 145 Approval for the applicable class and ratings; and
 - d. The organization providing the MAA with a copy of each applicable CAA Part 145 CAA Audit Report within 10 working days of receiving this report; and
 - e. The MRP Part 145 Approval certificate not being surrendered or revoked.
7. The organization **should** ensure that the supplement continues to reflect the organization's procedures and activities. Any change will require an amendment of the supplement iaw paragraphs 9-12 of this Appendix.
8. The organization **should** continue to cooperate with the MAA, as required.

Amendment of MRP Part 145 Approval

9. Any amendment of the supplement **should** be submitted to the MAA iaw the relevant procedure contained within the supplement.
10. In addition, the organization **should** notify the MAA of any proposal to carry out any of the following changes so the MAA can determine continued compliance with the supplement and to amend, if necessary, the Approval certificate:
- a. The ownership of the organization or its parent company.
 - b. The name of the organization.
 - c. The main location of the organization.
 - d. Additional locations of the organization at which the MRP Part 145 Approval will be exercised.
 - e. The Accountable Manager.
 - f. Any of the persons nominated as responsible for the organization's compliance with the supplement, as detailed in paragraph 16 of the Annex.
11. Notification **should** occur before such changes take place, except in the case of proposed changes in personnel not known to the management beforehand; these changes **should** be notified at the earliest opportunity.
12. Failure to ensure that the CAA Part 145 MOE and the supplement are kept up to date in respect of regulatory changes, and that the organization staff comply with the procedures therein, could invalidate the MRP Part 145 Approval.

Revocation, Surrender and Suspension of the MRP Part 145 Approval

13. An MRP Part 145 Approval **should** be revoked or suspended¹⁶ by the MAA if the organization fails to comply with the conditions and requirements detailed in this Annex.
14. A revocation or suspension of the CAA Part 145 Approval **should** automatically invalidate the MRP Part 145 Approval.
15. The MAA will notify the holder of an MRP Part 145 Approval in writing regarding any suspension.
16. Organizations that do not exercise the privileges of their Approval within a two year period **should** surrender the Approval unless a contractual requirement for its retention can be demonstrated.
17. Upon surrender or revocation, the MRP Part 145 Approval certificate **should** be returned to the MAA.

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► This RA has been substantially re-written; for clarity no change marks are presented – please read RA in its entirety ◀

RA 4821 - Findings and Observations (MRP 145.A.95)

Rationale

Following the Notification of an Assurance finding against a Maintenance organization, it is essential that the Regulatory non-compliance or other non-conformance is appropriately addressed and actioned by the Accountable Manager (Maintenance) (AM(M)). If findings are not acted upon, the Continuing Airworthiness of the Air System(s) may be compromised. This RA requires Root Cause Analysis (RCA) to be carried out on all findings, and observations (where applicable), to enable the identification and rectification of issues, to reduce the likelihood of reoccurrence.

Contents

4821(1): Findings (MRP 145.A.95)

4821(2): Corrective Actions (MRP 145.A.95)

4821(3): Observations (MRP 145.A.95)

Regulation 4821(1)

Findings (MRP 145.A.95)

4821(1) After receipt of Notification of an MAA finding the AM(M) **shall** devise and execute a Corrective Action Plan (CAP) to demonstrate how the finding and the root Cause will be rectified to reduce the likelihood of reoccurrence.

Note:

The principles of this Regulation **shall** be followed in resolution of any Maintenance Assurance findings in accordance with (iaw) appropriate policy.

Acceptable Means of Compliance 4821(1)

Findings (MRP 145.A.95)

Common AMC

1. All findings **should** be investigated and rectified using an RCA approach, tool, or technique¹.
2. Where necessary the organization **should** take immediate containment actions to preserve Air Safety.
3. For MAA findings the CAP **should** be provided to the MAA iaw MAA03² and include the corrective actions, preventive actions, and the implementation plan.

Additional AMC – Military Maintenance Organizations only

4. Nil.

Additional AMC – Approved Maintenance Organizations only

5. Instructions for the use of RCA **should** be detailed in the Maintenance Organization Exposition.

Guidance Material 4821(1)

Findings (MRP 145.A.95)

6. There are 2 types of MAA findings, Non-Compliance and Non-Conformance, each of which can lead to the MAA raising a Corrective Action Requirement (CAR). Findings are sub-divided into 2 levels as follows:

- a. Non-Compliance:

¹ Guidance can be found in Civil Aviation Authority – [CAP 1760 Effective Problem Solving and Root Cause Identification Stage 6](#) or [JSP 940 MOD Policy for Quality: Part 2: Guidance](#) and training is available through [MAA Training Courses](#) as applicable.

² Refer to MAA03: MAA Regulatory Processes, Annex F: MAA Assurance.

**Guidance
Material
4821(1)**

- (1) Level 1: A failure to meet MRP Part 145 Regulation, that could lead to a major Risk to Air Safety.
- (2) Level 2: A non-compliance that is judged not to be a Level 1.
- b. Non-Conformance:
 - (1) Level 1: A deviation from or an omission of a requirement that may contribute to a major Air Safety Risk.
 - (2) Level 2: A non-conformity that is judged not to be a Level 1.

Route Cause Analysis

- 7. RCA focuses on why the finding occurred not who or what were responsible. Establishing the root Cause(s) often requires an overarching view of the events and circumstances that led to it, to identify all the possible systemic and contributing factors (regulatory, technical, human, organizational, etc.) in addition to the direct factors.
- 8. A narrow focus on single events or failures, or the use of a simple, linear model, such as a Fault Tree Analysis, to identify the chain of events that led to the finding may not properly reflect the complexity of the issue, increasing the Risk that important factors to be addressed to prevent a reoccurrence will be missed. An inappropriate or partial RCA could lead to 'quick fixes' that only address the symptoms of the finding.
- 9. A peer review of the results of the RCA may increase its reliability and objectivity.

**Regulation
4821(2)**

Corrective Actions (MRP 145.A.95)

- 4821(2) The actions in the CAP **shall** be implemented to the satisfaction of the MAA and within the agreed timescales².

**Acceptable
Means of
Compliance
4821(2)**

Corrective Actions (MRP 145.A.95)

- 10. After receiving the acceptance of the CAP from the MAA, the organization **should** implement the actions within the agreed period.
- 11. The organization **should** inform the MAA when the CAP has been completed and provide sufficient evidence to justify closure.

**Guidance
Material
4821(2)**

Corrective Actions (MRP 145.A.95)

- 12. Nil.

**Regulation
4821(3)**

Observations (MRP 145.A.95)

- 4821(3) Any observations² noted during MAA Audits **shall** be given due consideration by the organization, and any decisions taken in respect of those observations recorded.

**Acceptable
Means of
Compliance
4821(3)**

Observations (MRP 145.A.95)

- 13. For each negative observation notified by the MAA, the organization **should** analyse the related issues and determine when actions are needed. The handling of the observations may follow a process similar to the handling of findings by the organization.
- 14. The organization **should** record the analysis and the outputs, such as the actions taken or the reasons for not taking actions.

**Guidance
Material
4821(3)**

Observations (MRP 145.A.95)

15. Nil.

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