

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

The questions and answers listed below were collected during the EASA in-house training courses, Europe and USA Workshops. The answers included were reviewed and coordinated by both EASA and FAA.

This Q&A document is published in both EASA and FAA websites.

QUESTION 1	
An EU Part 145 Organisation with a FAR 145 Repair Station Approval and a line station in one of the accepted EU countries. This line station is surveyed by whom? a) Approving AA b) AA of line station Annex 2, par. 4.3.3	
ANSWER	
The right answer is a) (refer to MAG Section C Part I paragraph 6.2 Note)	

QUESTION 2	
Can an EASA Part 145 organisation with FAA Part 145 approval issue a FAA Form 8130-3 with dual release or only EASA Form 1 with dual release?	
ANSWER	
Only EASA Form 1 dual release	

QUESTION 3	
MAG Section A –App. 1 Where can we find the list at EASA homepage?	
ANSWER	
Is part of the MAG which can be founded at the following web address http://easa.europa.eu/rulemaking/docs/international/united-states/bilateral-agreements/MAG_signed.pdf	

QUESTION 4	
Can an organisation still apply to the FAA approval as a repair station without applying for a 2042/P 145 approval i.e. standalone FAA repair station without the ability to issue a dual certificate?	
ANSWER	
No. FAA 14CFR part 145 approval is based on Regulation (EC) 2042/2003 Annex II Part-145 approval plus FAA Special Conditions (refer to the Agreement Annex 2 paragraph 4.3)	

QUESTION 5	
Can the Agency state: what standardisation tasks will be associated with the Bilateral. 736 (CAW/IAW)+ Bilateral + FAA Sampling Inspections for AA's?	
ANSWER	
Related with the Agreement the following standardisation activities are performed or will be performed by the Standardisation Department: a) EASA verification of compliance with Special Conditions (AAs of the Member States listed in Appendix 2 to Annex 2). The audit schedule may not be synchronised with EASA standardisation inspection schedule. Visit frequency is normally once every 2 years. FAA is invited to participate as observer (refer to MAG Section A Part II	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

<p>paragraph 1.9);</p> <p>b) EASA Sampling Inspection System in USA (SIS) (Refer to MAG Section A Part II paragraph 2.0);</p> <p>c) Participation of EASA Standardisation in the Flight Standards Evaluation Programme in USA as observer (Refer to MAG Section A Part II paragraph 3.0).</p> <p>d) FAA Sampling System. FAA will provide the annual schedule to EASA for coordination with the AAs. Each AA can expect a visit at least every 18 months. Teams includes an EASA Standardisation representative.(Refer to MAG Section A Part II paragraph 4.0)</p>

QUESTION 6	
How will the Sampling Program be based (i.e. No of Repairs Stations will this determine No of sample inspection visits?)	
ANSWER	
Please refer to MAG Section A Part II paragraph 4.0	

QUESTION 7	
Can the Bilateral Oversight Board confirm that the FAA are/will accept new applications since the entry into force of the bilateral?	
ANSWER	
New applications are accepted but they are put on hold till the new TSA rule is published.	

QUESTION 8	
Clarify if an EU FAA Repair Station under the bilateral can issue an 8130-3 given the text of the agreement Appendix 2 Section 2.1.1(b)(iii) when compared to the text of the Note to MAG Section C Appendix 3 paragraph 7.	
ANSWER	
Under the Agreement only EASA Form 1 can be issued by an EU FAA Repair Station. The text in the above mentioned note means that precisely EASA Form 1 meets the requirements of 14 CFR 43 and 145.	

QUESTION 9	
The BASA is limited to Part 145 AMO's/Repair Stations. In the EU there are many N-registered aircraft not subject to being maintained by a Part 145 AMO (non-large aircraft and aircraft not used in CAT) examples: King Airs, etc... Such aircraft are typically maintained by Part M Subpart F AMO's. Will the BASA be amended to include Part M/F AMO's?	
ANSWER	
For the time being no.	

QUESTION 10	
May the elements/subjects of the FAA supplement to the MOE integral included in the MOE with a cross reference between the required subjects of the FAA supplement (Special Conditions 2.11.1(b) as on page 28 through 30)? This wording method ensures that the AMO can develop a proper functioning Quality Management System. Note: the manner how EASA and FAA impose the regulations (i.e. the BASA Special Conditions) does <u>not</u> assist the organisation in establishing one proper Quality management System.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

[Drawing provided]	
ANSWER	
According to the Agreement AMO willing to have FAA 14 CFR part 145 approval must provide a supplement in English to the MOE. If any or all items identified the FAA Supplement sample (MAG Section C Appendix 3 “Sample FAA Supplement) are already contained in English in the MOE then you can refer to the appropriate MOE section in the Supplement.	

QUESTION 11	E. Roozen CAA-NL
Is there a cross reference between EASA Part 145 and FAA 14 CFR 145 articles identifying: the commonality/equivalency and the basis for the special conditions? This will assist in better understanding what the legal basis is for the special conditions. The cross reference will assist the AMO in demonstrating compliance with the BASA Annex/MAG during the transfer process.	
ANSWER	
The comparison between the systems was performed during the negotiations process between EU Commission (on behalf of the EU Member States in accordance with an EU Council decision) and USA. The Special Conditions are the result of that comparison. It was not foreseen to publish the comparison table as the Special Conditions will enable organisations to meet the requirements to be approved by each Party.	

QUESTION 12	
CE/USA/Annex 2/App.1/en 2 § (iv) requires for a/f/ aircraft facilities procedures to ensure that C of A and ARC are valid. This is not a 145 but MA201/301 requirement. It appears that this Special Conditions has no legal basis. Am I correct?	
ANSWER	
The required Special Condition is only applicable to USA based organisations willing to have an EASA Part-145 Approval, even if the Special Condition is not strictly linked with Regulation (EC) 2042/2003 Annex 2. The legal basis is the Agreement.	

QUESTION 13	Theo Versteeg CAA-NL
How can the inspector of the NAA receive knowledge and experience of what is an acceptable means of compliance to the Special Conditions?	
ANSWER	
The MAG Section A and Section C is the guidance that NAAs inspectors should use with regards to the initial and continuation of EU based organisations holding also USA 14 CFR part 145 approval. There is no AMC to Special Conditions.	

QUESTION 14	Theo Versteeg CAA-NL
FAA Special Conditions applicable to EU based approved maintenance organisations increase “(v) procedures to notify the FAA regarding changes” to the organisation whereas the Maintenance Annex Guidance is more strict the change needs to be <u>approved</u> by means of an <u>application</u> .	
ANSWER	
The question is referring to incomplete phrase from the Agreement. The complete requirement is “ <i>procedures to notify the FAA regarding changes to line stations that : 1) are located in an EU Member State; and 2) maintain U.S. registered aircraft; and 3) that will impact the FAA Operations Specifications</i> ”. MAG is not stricter as it refers to different type of changes that need an application and to be approved. Please refer to MAG Section A and	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

Section C Part III.

QUESTION 15	Theo Versteeg CAA-NL
Can NAA staff act as EASA observer in FAA FSEP?	
ANSWER	
NAA staff is participating in the SIS visits as indicated in MAG Section A Part II paragraph 2.3. When it comes to FSEP programme the MAG refers only to EASA's participation in FAA's internal quality assurance functions that FSEP is part of. Please refer to MAG Section A Part II paragraph 3.	

QUESTION 16	Theo Versteeg CAA-NL
How can NAA staff join in EASA SIS inspections in the USA?	
ANSWER	
As we progress with the implementation of the Agreement and the Transfer Provisions this issue will be taken care off. In principle qualified inspectors complying with MAG Section A Part II sub-paragraph 2.3.3 conditions are potential candidates.	

QUESTION 17	
Article 4.2 of Annex 2 of the Agreement states that the approval certificate shall not exceed the scope contained in the certificate issued by the other party. What happens with FAA repair stations approved for ratings not included in the EASA certificate, for example Annex II aircraft?	
ANSWER	
These cases are covered by the Agreement under resolution process within the JMCB. Annex II aircraft are excluded from the Agreement.	

QUESTION 18	
What happens to new applicants for a FAA repair station approval during the two year window period? If the AA is still in process of training the inspectors, can the applicant go through the FAA, as in the old system, or shall the applicant have to wait to be processed under the initial certification process detailed in the MAG?	
ANSWER	
There are two different cases: Countries under Transition Provisions and Countries under Transfer Provisions. In case of Countries under the Transfer Provisions the applicant should apply to FAA until the time where the files have been transferred. Countries under Transition Provisions (France, Germany and Ireland) are already covered which means that applicants apply directly to the AAs of those Countries.	

QUESTION 19	
What happens to applicants that submitted the application to the FAA before entry into force of the agreement and are still in the process of getting the approval? Will the FAA finalise the process and then transfer the Repair Station to the AA?	
ANSWER	
Those applications are on hold due to TSA rule. As there is no progress in the applications made up till now in principle all files will be transferred as they are. Please refer to MAG Section A Part VI Transfer Provisions for further clarification.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 20	
Are the approvals independent from TSA?	
ANSWER	
No.	

QUESTION 21	
Case of aircraft not certified in EASA and not in the list of eligible types of Part 66 licences.	
ANSWER	
Please refer to the Note in MAG Section A Part VI page 31.	

QUESTION 22	
Case of FAA only approved organisations and with certifying staff having only FAA appliances.	
ANSWER	
These cases are to be reviewed in a case by case basis within the JMCB.	

QUESTION 23	
Acceptance by the FAA of a BASA's STC with a Luxemburgish holder, issued in 2007 and another in 2008.	
ANSWER	
These question is covered by Annex 1 to the Agreement and the related Technical Implementation Procedures (TIP)	

QUESTION 24	
Is this safety agreement applicable to EASA (non-EU) member states, such as CH,NO,IS?	
ANSWER	
No	

QUESTION 25	
Until now, it was not possible to obtain an initial BASA MIP FAR 145 agreement because of discussions about TSA and drugs/alcohol requirements, when do you think that this situation will be clarified (we have today EASA Part 145 repair stations asking since two years this FAR 145 agreement)?	
ANSWER	
This situation can only be clarified after the TSA rule is published. No dates yet.	

QUESTION 26	
Is there still a possibility for a national organisation to receive only a FAR 145 approval without to have a Part 145 (only for example having a part 21 or a Part MF)?	
ANSWER	
In principle no.	

QUESTION 27	
Is it possible for an organisation having two base maintenance locations to have one Part	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

145 approval covering one location and to require a FAR 145 approval covering the two base maintenance locations? If yes, how to manage this situation?
ANSWER
No

QUESTION 28
Our understanding of the transition is the possibility, for Basa MIP agreements now arriving to their end date, to postpone for a period of three months the EASA survey in order to get the new FAA supplement ready. Is it the aim to align EASA and FAA end dates of survey or to have more time to do the transition? (Section C page 18 - § VI 7.)
ANSWER
The intention is to give some time to the AAs and to the AMOs time to incorporate the changes arising from the Agreement and the MAG.

QUESTION 29
If a French repair station want to open a secondary base in Germany (for instance) , is it possible for DGAC/OSAC to subcontract these survey activities to LBA ?
ANSWER
No

QUESTION 30
For BASA MIP Repair Stations, could you confirm that the new FAA supplement is to be obtained at the renewal date (MAG Section C page 18 VI 8.) ?
ANSWER
The Supplement has to be amended to be in line with the Agreement at renewal date plus 90 days if the renewal date is within the 3 month period. See MAG Section C Part VII Transition Provisions.

QUESTION 31
Could you precise detailed applicability of training concerning dangerous goods (for instance, is an independent 145 repair station, maintaining equipment concerned by this requirement)? (Section A page 26 - §2 .1.1 a)(iii) and Section C page 3 §7.4)
ANSWER
The answer is yes an independent 145 repair station is concerned by this requirement if the article that they are maintaining contains hazardous material and will be shipped on a U.S. air carrier's aircraft.

QUESTION 32
Could you confirm that the acceptance of component is one of the major modifications of FAA supplement (Section C Appendix 3 page 10 §7 c)?
ANSWER
All though this is a new Item in the FAA Supplement it should not be considered a major modification it is merely a clarification of what is acceptable.

QUESTION 33
Are Quarterly reports for top ten subcontractors activities referred in special conditions in section A still mandatory: indicated cancelled in MAG Section C Appendix 3,page 15, §10

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

Note) ?	
ANSWER	
No. This FAA Special Condition was agreed to be deleted from Annex 2 during the BOB meeting held 30/06/2011.	

QUESTION 34	
Do we have to describe subcontractors in a different way from EASA requirements (MAG Section C Appendix 3 page 15, §10 b) Note) ?	
ANSWER	
FAA accepts EASA Part-145 requirements for the MOE to contain a list of all contractors utilized by the AMO and approved by the AA as part of the MOE. Please refer to MAG Section C Appendix 3 paragraph 10 a). The Note mentioned in the question refers to AMO QMS covering or not the FAA Special Conditions.	

QUESTION 35	
Could you confirm that the requirement of not using EASA 145 A 30 j)3)4)5) is cancelled in the new FAA supplement (not in FAA Supplement Section C Appendix 3 page 5 §4.)	
ANSWER	
EASA Part-145.A.30 j) 3), 4) and 5) are applicable with the additional requirement that the personnel involved can read, write and understand English language. Refer to MAG Section C Appendix III paragraph 14	

QUESTION 36	
Could you confirm that the requirement of specific calibration requirement is cancelled in the new FAA supplement (note in FAA Supplement Section C Appendix 3 neither in special conditions)	
ANSWER	
Yes	

QUESTION 37	
Could you confirm that the Personnel Training requirements (training program) disappear from FAA supplement summary (not in FAA Supplement Section C Appendix 3) ?	
ANSWER	
Yes.	

QUESTION 38	
EASA / FAA ratings: Why new C21 et C22 EASA ratings haven't FAA equivalent ratings? (Appendix 7 FAA & EASA Class and Rating Comparison and Guidance)	
ANSWER	
The main reason is because these ratings are new in relation to the ones existing at the time when the comparison between the US and EU systems was performed.	

QUESTION 39	
What could be the case if the organisation requires in its FAR145 scope one aircraft not certified by EASA so aircraft which could not be introduced in the Part 145 scope?	
ANSWER	
It is not possible under the Agreement. This is an issue that has to be discussed within the	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

JMCB.

QUESTION 40	
What is the operational process which permits one authority / one organisation to not apply fully the MAG but to apply another acceptable solution: is there a practical deviation process?	
ANSWER	
Under the Agreement it is not possible.	

QUESTION 41	
Could you confirm there is no obligation for an organisation based in country X and having a base maintenance location in country Y (among the 15 countries concerned by the BASA) to be surveyed by the authority of the country Y?	
ANSWER	
There is no obligation for NAA of country Y in respect to FAA Approval.	

QUESTION 42	
<ul style="list-style-type: none"> a) What are the different rules (communication between the FAA and AA, certificate, surveillance responsibilities...) in case the FAA does the direct surveillance of a specific location associated to an organisation surveyed by the AA on behalf of the FAA? b) Are the line maintenance stations located in Europe (even outside of the 15 NAA under BASA) under the surveillance of the NAA in all case? c) Is the surveillance of the base maintenance/fixed location in Europe but outside of the 15 NAA under BASA under the surveillance of the FAA in all case? 	
ANSWER	
<ul style="list-style-type: none"> a) If FAA does direct surveillance means that there is a standalone FAA Approval, even if that specific location is associated with an organisation surveyed by the AA. This situation can only happen if the additional location is located outside of the 18 Countries listed in Appendix 2 to Annex 2 or outside EU. b) Yes, line stations located in EU even outside the 18 Appendix 2 to Annex 2 Countries are under the surveillance of the NAA in all cases; c) Yes. If the additional base maintenance / fixed location is within EU or outside EU it means that there is a need for a standalone FAA Approval (case a) above) and in this case it falls under the responsibility of FAA (Refer to Agreement Annex 2 subparagraph 4.3.2) 	

QUESTION 43	
Is there any obligation to align the due date of the EASA form 6 and the due date of the FAA annex to FORM 6	
ANSWER	
No but it is advisable to do so.	

QUESTION 44	
Is it possible to issue an EASA dual release after maintenance performed following maintenance data provided by an air carrier in deviation with the manufacturer data?	
ANSWER	
All data used has to be Approved Data. Refer to MAG Section C Appendix III page 147 and	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

148

QUESTION 45	
What is the situation of the EASA MS that are not EU MS in relation to the new bilateral?	
ANSWER	
The issue is pending. Final answer to this question is not in EASA hands.	

QUESTION 46	
Why only 17 EU MS out of the 27 are listed in Appendix 2 to Annex 2?	
ANSWER	
The inclusion of EU MS in Appendix 2 to Annex 2 is dependent on positive initial assessment in accordance with the provisions include in Annex 2.	

QUESTION 47	
Where the specific scope of reciprocal acceptance established?	
ANSWER	
Question is not clear. Appendix to Annex 1 contains what is accepted under the Agreement with regards to Airworthiness and Environmental Certification. For Annex 2 both FAA and EASA have a published list of Approved Maintenance Organisations / Repair Stations in each territory.	

QUESTION 48	
Are the countries on the list in Appendix 2 to Annex 2 obliged to accept the agreement?	
ANSWER	
The Commission has negotiated on behalf of the European Union in accordance with a Council Decision. The Agreement was approved by the Council on behalf of the EU. The Agreement is binding to all EU MS.	

QUESTION 49	
What kind of office is the Brussels office of the FAA?	
ANSWER	
Brussels FAA office is a policy office. It is also used as a liaison office to the Commission. The Brussels office coordinates with U.S. diplomatic missions and work with foreign aviation authorities to encourage and foster development of civil aeronautics and air commerce.	

QUESTION 50	
Are both Part 145 and Subpart F concerned?	
ANSWER	
No. Only Part-145 is covered by the Agreement.	

QUESTION 51	
Territorial implementation of the treaty?	
Some controversy and discussion during the course on the Territorial implementation	
ANSWER	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

The Agreement is applicable only in the territory of the United States of America in one hand and in the territories in which the Treaty establishing the European Union is applied.

FAA certificates issued under the Agreement shall:

- a) Only cover fixed stations located within a Member State listed in Appendix 2 to Annex 2. Each additional fixed location must also be under the surveillance of an Aviation Authority identified in Appendix 2.
- b) Line stations located within an EU Member State and under the surveillance of an Aviation Authority identified in Appendix 2

EASA certificates issued under the Agreement shall only cover line stations located within the territory of United States.

QUESTION 52	
How often is an EASA SIS check run?	
ANSWER	
Up till now 6 SIS visits to USA are performed every year. They are performed by two teams visiting two different Flight Standards District Office (FSDO) during one week. Three of these EASA missions are organised every year.	

QUESTION 53	
Transfer process: FAA and NAAs need to do something; who is first?	
ANSWER	
First AAs must complete training of the personnel regarding procedures relating to the Agreement, Annex 2 and FAA Special Conditions. Once a sufficient number of AAs staff has completed the training to provide oversight of the facilities to be transferred, AAs must declare their readiness to FAA by contacting the Frankfurt IFO. FAA will start the transfer of the files the renewal date being the main criteria.	

QUESTION 54	
What about new Repairs Stations?	
ANSWER	
New Repair Stations are on hold till TSA rule is published. After that, Repair Station Approval will follow MAG procedures.	

QUESTION 55	
The FAA SS will they be inspecting Repairs Stations or will they audit the NAAs and raise findings against the NAAs?	
ANSWER	
Both as per MAG Section A Part II paragraph 4 "FAA Sampling System"	

QUESTION 56	
How can proof of need requirement be complied to?	
ANSWER	
On the basis of a letter of intent, costumer order, contract, etc	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 57	
What about an AMO that has outstanding findings?	
ANSWER	
<p>There are two possible situations:</p> <ul style="list-style-type: none"> a) AMO looking for initial FAR 145 Approval In this case the AA should ensure that the AMO does not have any outstanding findings of non-compliance from AA oversight audits. b) AMO also holding a FAR Part 145 Approval to be transferred In this case findings are not expected to impede any transfer process 	

QUESTION 58	
Can the supplement to the MOE be in the national language?	
ANSWER	
<p>The Supplement shall be in English, approved by the AA and maintained at the AMO. (Appendix 1 to Annex 2, paragraph 2 “FAA Special Conditions Applicable to EU Based Approved Maintenance Organisations”). The AA may require the supplement to be submitted in duplicate: one in English, the second in the AA national language (MAG Section C Appendix 3 Sample FAA Supplement).</p>	

QUESTION 59	
How should the AA accept the Supplement, because the FAA does not formally accept the document?	
ANSWER	
Please refer to MAG Section C Part I paragraph 8 “AA Guidance”.	

QUESTION 16	
Extent of approval. Request of clarification.	
ANSWER	
The certificates issued under the Agreement shall not exceed the scope of the ratings and limitations contained in the certificate issued by FAA (case of EASA Part 145 in USA) or Aviation Authority (case of FAA Part 145 in EU)	

QUESTION 60	
When the FAA does an SS, they will audit all?	
ANSWER	
It's sampling method. Please refer to MAG Section A Part II paragraph 4 “FAA Sampling System”	

QUESTION 61	
What about working of base, a fixed location outside the US territory and EASAs Part 145 approval?	
ANSWER	
Please refer to question 7. Fixed location outside the US territory is not covered by the Agreement.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 62	
What about checking if the ARC is valid?	
ANSWER	
Only applies to U.S based EASA Part-145 organisations.	

QUESTION 61	
What countries in Europe are affected by the New Agreement?	
ANSWER	
There are currently 17 E.U. Member States they are listed in appendix 2 of the agreement, they are as follows: Republic of Austria, Kingdom of Belgium, Czech Republic, Kingdom of Denmark, Republic of Finland, French Republic, Federal Republic of Germany, Republic of Ireland, Italian Republic, Grand Duchy of Luxembourg, Republic of Malta, Kingdom of the Netherlands, Republic of Poland, Portuguese Republic, Kingdom of Spain, Kingdom of Sweden, United Kingdom of Great Britain and Northern Ireland.	

QUESTION 62	
For the European Union (EU) Aircraft Maintenance Organisation (AMO) applicants that have already submitted the FAA Form 8310-3 (i.e. are in the queue), will they need to resubmit the form to their local aviation authority?	
ANSWER	
All pending applications of EC based AMOs must transition/transfer to their respective Aviation Authority's (AA) within the 2-year time-frame as outlined in the Maintenance Annex Guidance. AA's of EC member states may request those applicants in a "pending status" to submit a new application if the AA's have instituted new or additional requirements to the application process, or there has been a change to their status. NOTE: Based upon August 2008 legislation a new applications may apply for but the FAA may not certify any foreign repair station under Part 145 of title 14, Code of Federal Regulations until after such date that the new Transportation Security Administration has issued new regulations on "part 145 security".	

QUESTION 63	
Is there training available to Flight Standards Aviation Safety Inspectors on the New Agreement between European Union and United States?	
ANSWER	
Yes, Flight Standards Service (AFS) and Aircraft Certification Service (AIR) have developed a NEW training course for employees. The new course became available on May 9, 2011 and is available to AFS employees in eLMS under course no. FAA27100066, for AIR employees it is course no. FAA27200002, titled Understanding the US/EU Aviation Safety Agreement. The course will soon be available to industry personnel via "Blackboard" through the internet. Check back for details when it becomes available.	

QUESTION 64	
Where did the Maintenance Annex Guidance (MAG) come from?	
ANSWER	
The MAG is guidance that has been developed and agreed upon by the Joint Maintenance Coordination Board (JMCB). The JMCB is under the joint leadership of the FAA Director of Flight Standards and the EASA Director responsible for Organization Approvals.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 65	
What is the Joint Maintenance Coordination Board (JMCB)?	
ANSWER	
<p>The JMCB is established under the agreement in Annex 2 as a joint technical coordination body with leadership from the EASA Director responsible for Organization Approvals and the FAA Director of Flight Standards Service. They are responsible for appointing a technical team of specialist to review and resolve issues, develop policy and procedures, and facilitate publication in accordance with each other's systems.</p> <p>The JMCB will meet annually for (2) days to ensure the effective functioning and implementation of the Agreement, Annex 2. Their functions shall include:</p> <ul style="list-style-type: none"> (a) Developing, approving, and revising detailed guidance to be used for processes covered by this Annex; (b) Sharing information on major safety issues and developing action plans to address them; (c) Ensuring the consistent application of this Annex; (d) Resolving technical issues falling within the responsibilities of the Technical Agents and examining other technical issues that cannot be solved at lower level; (e) Developing, approving, and revising the detailed guidance to be used for transition, cooperation, assistance, exchange of information, and participation in each other's internal quality audits, standardization, and sampling inspections related to maintenance and quality management and standardization systems; (f) Maintaining the list of Aviation Authorities identified in Appendix 2 of this Annex according to the decisions taken by the Bilateral Oversight Board; (g) Proposing to the Bilateral Oversight Board amendments to this Annex. Another responsibility of the JMCB is to report unresolved issues to the Bilateral Oversight Board and ensure decisions reached by the Bilateral Oversight Board (BOB) are implemented. 	

QUESTION 66	
Is there any type of Executive Management oversight of the agreement?	
ANSWER	
<p>Yes, oversight was established by a Bilateral Oversight Board (the "Board"), which is responsible for ensuring the effective functioning of this Agreement and shall meet at regular intervals to evaluate the effectiveness of its implementation. The Board shall be composed of representatives of:</p> <p>The Federal Aviation Administration (FAA) (co-chair), and The European Union, which shall be the European Commission (co-chair) assisted by the European Aviation Safety Agency (EASA) and accompanied by the Aviation Authorities (AA). All decisions of the Board are taken by consensus with each Party having one vote. These decisions are in writing and signed by the Parties' representatives on the Board. More details on the Board can be found in the agreement under Article 3, Executive Management.</p>	

QUESTION 67	
What parts of the EASA Form 9 needs to be completed during an Amendment for a name change?	
ANSWER	
<p>The FSDO will complete Part 1 and Part 4 of EASA Form 9 for an Amendment due to a name or address change. This requirement will be reflected in the next revision to the MAG Section B III.</p>	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 68	
When the Repair Station applies for a name change to the EASA supplement are they required at this time to update from the MIP-G to the MAG? or are they only required to update to the MAG by their continuation/renewal date?	
ANSWER	
Renewals that are due in 2011 may still be processed under the provisions of the MIP-G. However a PTRS is initiated to document the process. After 2011, renewals must be processed under the provisions of the MAG. All EASA approval holders must have a new supplement in place at the latest by December 31, 2012.	

QUESTION 69	
May I export overhauled components from a 14 CFR part 145 repair station on a FAA Form 8130.3?	
ANSWER	
Under the terms of the U.S./European Community (EC) Safety Agreement (the Agreement) and its maintenance annex (Annex 2), articles maintained by a 14 CFR part 145 repair station that also holds an EASA Part 145 approval are eligible for installation on an EU registered Aircraft if they are returned to service using a FAA Form 8130-3 with a dual release. If the part overhauled by a 14 CFR part 145 repair station is to be installed only on a U.S. registered aircraft then the part is eligible for export using a FAA Form 8130-3 maintenance release.	

QUESTION 70	
May I export rebuilt propellers to Europe?	
ANSWER	
If the propeller is only being used on a U.S registered aircraft then it is eligible for export using FAA Form 8130-3 maintenance release annotated as "rebuilt". It is not eligible to be released with a dual release and therefore not eligible to be installed on EU registered aircraft.	

QUESTION 71	
Can dual releases be accomplished using the FAA Form 8130-3 or EASA Form 1 in countries not covered under the terms of the U.S./European Union (EU) Safety Agreement (the Agreement) and its maintenance annex (Annex 2).	
ANSWER	
No, A Dual Release certificate (FAA Form 8130-3 or EASA Form 1) can only be issued by companies that are both FAA and EASA, approved facilities located in the U.S. or Europe listed in Appendix 2 of the Agreement and appendix 1 of the Maintenance Annex Guide (MAG).	

QUESTION 72	
What is an EASA Form 8 and its use?	
ANSWER	
EASA SIS Form 8 is used by the SIS team to document findings and recommendations of their visit to an US based 14 CFR part 145 repair station and is referred to as EASA visit report AMO Appendix 2, Section A of the MAG.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 73	
What is an EASA Form 10 and its use?	
ANSWER	
EASA SIS Form 10 is used by the SIS team to document findings and recommendations of their visit to a FSDO and is referred to as EASA visit report Appendix 3, Section A of the MAG.	

QUESTION 74	
Can rebuilt engines, propellers and components rebuilt by the OEM or PMA manufacturer be installed on EU registered Aircraft.	
ANSWER	
<p>- Yes, only in case of engines rebuilt by the OEM as detailed in the TIP. However those engines are not considered repaired and must not be released with a maintenance release. EASA recognizes the term “Rebuilt Engines” as a manufacturing certification practice, but not as a maintenance release by the FAA. The TIP places the same import requirements on rebuilt engines that are on new aircraft engines. They have to be released with an 8130 production release.</p> <p>- NO, for propellers and all other components whether rebuilt by OEM or PMA. Rebuilt propellers, components (and engines, which are not rebuilt by the OEM), must not be installed in EU registered aircraft. Used engines, propellers and components may only be installed under the conditions of the MAG, meaning: repaired or overhauled in an appropriately rated FAA repair station holding EASA approval and released on a 8130 Dual release certificate issued as a maintenance release.</p>	

QUESTION 75	
What is a “critical part” and what/who determines a critical part	
ANSWER	
Contact the TC holder. Second call authority in the absence of TC holder statement FAA for state of design U.S. and EASA state of design EU. Ref. MAG, Section C, Para 11. and Section B, Para 8	

QUESTION 76	
A turbine engine is being repaired in a country that is part of the Agreement for a European customer. Can the Design Organization Approval's (DOA) data be used for the repair?	
ANSWER	
Yes. Please refer to Annex 1 and the TIP.	

QUESTION 77	
When the FAA reports a finding to EASA, does the FAA include the approval holder's response (especially if the approval holder disagrees with the findings)?	
ANSWER	
Yes. Form 9, Part 4, has this information.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 78	
When a U.S. manufacturer and a 14 CFR part 145 repair station that has an EASA approval are located in the same facility, does the article have to be accompanied with FAA Form 8130-3 dual release when it is transferred within that facility?	
ANSWER	
Yes. To ensure traceability to the U.S. OEM. Ref. the MAG, Section B.	

QUESTION 79	
If an FAA Form 8110-3 is accomplished by a Designated Engineering Representative (DER) for a fabricated part for a repair on a t-wheel, is this data acceptable for repair?	
ANSWER	
Yes.	

QUESTION 80	
Can an AMO located in the European Union (EU) use a DER minor repair for a component to be used in U.S.-registered aircraft?	
ANSWER	
Yes. Please refer to Annex 1 and TIP Section 3.3.3	

QUESTION 81	
Does a change in ownership require a new certificate (i.e., via stock swaps, etc.)?	
ANSWER	
A) U.S. requirements: Yes, a new application is required, but can keep the same number B.) EASA requirements: Yes, a new application is required, but can keep the same number	

QUESTION 82	
Can a repair station continue to operate with an extension?	
ANSWER	
Yes. Section A for the transfer, Section B for renewals.	

QUESTION 83	
How are repair specifications accepted / approved?	
ANSWER	
This is done via a letter from the ACO or Repair Specification DER (RS-DER) approval on 8110-3	

QUESTION 84	
Does EASA provide a written justification for revoking or suspending an operator's part 145 approval?	
ANSWER	
Yes. Ref. the MAG, Section A and B.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 85	
Does EASA allow fabrication of parts during the course of a repair?	
ANSWER	
Yes, but only during the process of the repair and not for resale.	

QUESTION 86	
If you follow AC 43-18, are those fabricated parts acceptable?	
ANSWER	
Yes, but only if it falls in one of the three categories the AC outlines and is acceptable only during the process of the repair and not for resale.	

QUESTION 87	
Does the Agreement recognize the Voluntary Disclosure Reporting System (VDRP) in regards to Suspected Unapproved Parts (SUP)?	
ANSWER	
Yes, under EASA occurrence reporting can be done anonymously.	

QUESTION 88	
What is the difference between the Service Difficulty Report (SDR) and the malfunction and defects (M&D) report?	
ANSWER	
They both recognize the same thing, but the FAA is focusing primarily on the SDR system, including all 145, 121, and 135.	

QUESTION 89	
How does EASA handle self-disclosures?	
ANSWER	
Same as Question 87.	

QUESTION 90	
Can incomplete manufactured articles be exported with an FAA Form 8130-3?	
ANSWER	
If raw material, good with COC. If a finished product, then 8130-3.	

QUESTION 91	
Can a repair station/AMO meet their supplement requirements by cutting/pasting the special conditions from the Maintenance Annex Guidance (MAG)?	
ANSWER	
No. Ref. the MAG, Section B. The supplement needs to be customized.	

QUESTION 92	
Can a repair station/AMO meet their supplement requirements by using an index page that only references the related sections from their repair station manual (RSM)?	
ANSWER	
No. Some elements can be referenced, but not the whole document. Ref. the MAG, Section B, for further guidance.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 93	
Can a Supplement Type Certificate (STC) that has been previously validated be used by another repair station/AMO without re-validation?	
ANSWER	
Yes.	

QUESTION 94	
Is there a fee reduction for early EASA renewals?	
ANSWER	
No	

QUESTION 95	
What is the process for continuing an operation when a repair station is moving locations?	
ANSWER	
Same as FAA requirements.	

QUESTION 96	
What is the requirement for work away, and what is the process for notifying EASA for work away from a repair station's facility?	
ANSWER	
See the MAG, Section B, Appendix 1, Para 19.	

QUESTION 97	
What is considered "unrestricted access" for EASA Sampling Inspection System (SIS) team members?	
ANSWER	
The term used is "unrestricted access" which means that the repair station agrees to provide access to EASA and the FAA to ascertain compliance with 14 CFR part 145, the EASA Special Conditions, procedures and standards and to investigate specific problems.	

QUESTION 98	
Can FAA inspectors communicate directly with EASA?	
ANSWER	
FAA inspectors should communicate with EASA through your local FSDO.	

QUESTION 99	
What is the need requirement for a 14 CFR part 145 repair station to acquire and retain an EASA approval?	
ANSWER	
See the MAG, Section B, Part I, Para. 2.1.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 100	
What does a repair station/AMO need to do when there is a change in address?	
ANSWER	
Reference the MAG, Section B, Part III.	

QUESTION 101	
Can a U.S. repair station with an EASA approval accept components that are received from a Canadian AMO with a Canadian Form One for installation on a EU aircraft?	
ANSWER	
Yes, see the MAG, Section B, Appendix 1, Para 10.	

QUESTION 102	
What constitutes a “significant finding” at a U.S. repair station that has an EASA approval? What are the reporting requirements to EASA for these types of findings? Ref. the MAG, Section B, Part II, Para. 4.3.	
ANSWER	
<ul style="list-style-type: none"> • Serious failure to comply with EASA requirements • Overall failure to comply with the EASA special conditions • Failure to use FAA approved data for major repairs/alterations/ modifications • Failure of the repair station to maintain a working quality monitoring system Reporting requirements are the EASA Form 9	

QUESTION 103	
What constitutes a “significant change” to the certificate of a U.S. repair station that has EASA approval?	
ANSWER	
This term does not exist in the MAG. However, changes that affect the content of the certificate require application via Form 16. The process is outlined in the MAG, Section B.	

QUESTION 104	
Are geographical authorizations going away?	
ANSWER	
Yes	

QUESTION 105	
How are line stations approved if they are not covered by the Agreement?	
ANSWER	
They are directly approved by the responsible civil aviation authority.	

QUESTION 106	
Can a U.S. repair station located in Asia that also holds an EASA Part-145 approval accomplish a dual release?	
ANSWER	
No, because they are not part of the Agreement.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 107	
Does a EASA 145 who receives a PMA part from the PMA holder, must it be accompanied by and 8130-3?	
ANSWER	
Yes	

QUESTION 108	
What is EASA's position when work is performed on an article and the completion of the scope of work does not include all required work?	
ANSWER	
See the MAG, Section B. Below is the text from the MAG: a)Please note that the sub clause "except as otherwise specified" is intended for use with two types of deviations as follows: (1) The case where all required maintenance was not carried out. In this case, list the maintenance not carried out in Block 13 and/or attachments. (2) The case where the particular maintenance requirement was only EASA approved and not FAA approved. Example: an EASA Airworthiness Directive not approved by the FAA.	

QUESTION 109	
What is the requirement of the training manual for a 14 CFR part 145 repair station located in an EU country that is part of the Agreement?	
ANSWER	
A separate training manual is no longer required with repair stations under the Agreement. EASA Part-145 covers this requirement.	

QUESTION 110	
Does a 14 CFR part 145 repair station need to provide evidence of need to maintain an N-registered aircraft operating under part 129?	
ANSWER	
Yes, see 14 CFR 145.51(c).	

QUESTION 111	
Does compliance to the MAG meet the requirements of 14 CFR parts 43 and 145 for a 14 CFR part 145 repair station located in an EU country that is part of the Agreement?	
ANSWER	
EASA Part-145 plus compliance with the FAA special conditions meets the requirements of 14 CFR part 145.	

QUESTION 112	
Can an A&P technician employed by an EU-based AMO return to service a U.S.-registered aircraft?	
ANSWER	
Yes, but only under his A&P license number and not under the company approval.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 113	
Who approves a supplement?	
ANSWER	
In the U.S., the FAA accepts the EASA supplement. In the EU, the Member State AAs approves the FAA supplement.	

QUESTION 114	
When does maintenance documentation need to be in English?	
ANSWER	
See the MAG, Section C, Appendix 1, Para. 7.	

QUESTION 115	
Where is the definition for Instructions for Continuing Airworthiness (ICA) located?	
ANSWER	
The FAA, EASA, and TCCA are currently working on a definition.	

QUESTION 116	
Does EASA accept data that is approved under the ODA program?	
ANSWER	
Yes	

QUESTION 117	
Can the results of the FAA's sampling inspections assessment be shared with other Aviation Authorities (AA)?	
ANSWER	
Generally, no. But the host country can share results with other AAs.	

QUESTION 118	
Do AMOs have to undergo hazardous material (hazmat) training?	
ANSWER	
Yes, according to ICAO standards.	

QUESTION 119	
Does the FAA accept electronic copies of documents as well as documents with electronic signatures?	
ANSWER	
Yes to both items.	

QUESTION 120	
For an EASA AMO located outside of the EU, how is an article returned to service?	
ANSWER	
Use EASA Form 1 single release.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 121	
What is the surveillance process for line stations/line station authorizations located within and outside the EU and the U.S., as well as their respective territories?	
ANSWER	
Currently, only line stations located inside the U.S. and the EU are under the Agreement. Surveillance is performed by the FAA or the Member State AAs as applicable.	

QUESTION 122	
Will we have access to previous FAA audit reports of particular organizations?	
ANSWER	
This will be done on a case-by-case basis upon request by Member State AAs to the FAA.	

QUESTION 123	
How does an AA transfer FAA Annex to Form 6 to the FAA?	
ANSWER	
Preferred via e-mail.	

QUESTION 124	
Can the FAA scope of work be greater than the EASA scope of work?	
ANSWER	
No, in the future specialized services will be incorporated into an associated EASA rating.	

QUESTION 125	
Does the Agreement recognize products certified under the FAA Technical Standard Order (TSO) as being automatically accepted by EASA?	
ANSWER	
There is a process, but it's not automatic. Ref. the TIP, Section 2, Para 2.5.	

QUESTION 126	
When an EASA AD and an FAA AD contradict each other, how is an article returned to service with a dual release?	
ANSWER	
There is no dual release in this situation. Depending where the facility is located, you have to consult the MAG, Section B or C for further detail. See also question no. 150	

QUESTION 127	
How does a 14 CFR part 145 repair station that has an EASA approval use a capability list (CL) for the EASA ratings?	
ANSWER	
The FAA CL is acceptable to EASA.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 128	
How does an AMO that has a 14 CFR part 145 approval use a CL for the part 145 ratings?	
ANSWER	
The EASA CL is acceptable to the FAA.	

QUESTION 129	
What information is recorded in the CL?	
ANSWER	
Information required by each authority, as applicable. EASA requirement for EU AMOs and FAA requirements for U.S. repair stations.	

QUESTION 130	
What is the streamline process for acquiring approved data for repairs?	
ANSWER	
Ref. the TIP, Section 3, Para. 3.3.	

QUESTION 131	
Under the new Agreement, can an EASA Part-66 person return to service a U.S.-registered aircraft?	
ANSWER	
EASA Part-66 certified staff can only release U.S.-registered aircraft under the approval of the EU-based AMO, which also holds an FAA 14 CFR part 145 approval certification. The release to service should include both approval numbers. Ref. the MAG, Section C.	

QUESTION 132	
Does an AA approve or accept an FAA supplement?	
ANSWER	
The Member State AA approves the FAA supplement.	

QUESTION 133	
How are U.S. repair stations notified of pending SIS inspections of their organizations?	
ANSWER	
EASA informs the FAA regional coordination, who then informs the FSDO, who informs the affected repair stations.	

QUESTION 134	
Is there a difference between “alterations” and “modifications?”	
ANSWER	
Alteration is a process of altering and Modification is condition of being altered.	

QUESTION 135	
How does the FAA approve standards used for specialized service by AMOs?	
ANSWER	
The FAA does not approve any standards for specialized services for European AMOs.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 136	
Are there limitations to using EASA Form 1 for use on U.S. products?	
ANSWER	
See the MAG, Section B and C, regarding Release and Acceptance of Components.	

QUESTION 137	
For a 14 CFR part 145 repair station with an EASA approval, how can the maintenance release and the Quality Assurance (QA) audit be accomplished in small organizations where one person has both responsibilities?	
ANSWER	
Split the responsibilities, or have the audit performed by someone not involved in the activity that is audited. See the MAG, Section B, Appendix 1, for further details.	

QUESTION 138	
Is an Inspection Authorization (IA) approval 337 good for EASA release?	
ANSWER	
Yes, only if the data used is approved by the FAA.	

QUESTION 139	
For a 14 CFR part 145 repair station with EASA approval, what date needs to be entered into the enhanced Vital Information System (eVIS) regarding certification renewal?	
ANSWER	
The due date that is printed on the EASA certificate.	

QUESTION 140	
When significant findings are discovered between renewals, what is the process for completing EASA Form 9?	
ANSWER	
The process is in the MAG, Section B, Part II, Para 4.3 and 4.4.	

QUESTION 141	
For a 14 CFR part 145 repair station with EASA approval, what is the intent of the requirement of the accountable manager having financial authority?	
ANSWER	
This enables him to implement the required changes in order to correct findings raised during internal/authority audits.	

QUESTION 142	
How can DARs receive training on the new Agreement?	
ANSWER	
Via eLMS at the Web site: https://av-info.faa.gov/DsgReg/sections.aspx .	

QUESTION 143	
What is the revision status of FAA Order 8130.21?	
ANSWER	
Current revision is G, but the document is currently being revised.	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 144	
Can OpSpecs have an area for EASA line stations?	
ANSWER	
No. Line stations that serve EASA customers only can only be listed within the respective part of the supplement. Ref. the MAG, Section B, Appendix 1.	

QUESTION 145	
How can a repair station accept from a customer an alternate means to comply to an AD?	
ANSWER	
They can get an AMOC from the customer, who applied for an AMOC.	

QUESTION 146	
A repair station holds Specialized Service Ratings for Welding. During the workshop EASA talked about issues with welding rating not being compatible with the EASA ratings system. If so, how does the MSP-FSDO correct the ratings to make them compatible with the EASA ratings system?	
ANSWER	
This will be done on a case-by-case at the next renewal.	

QUESTION 147	
Do all subcomponents (define) that are installed on a next higher assembly have to have a dual release for the higher assembly to be returned to service with a dual release?	
ANSWER	
Yes. A standard part requires a COC only. A subcomponent requires an authorized release certificate, which is 8130 for new or 8130 dual release for used components.	

QUESTION 148	
Can a 14 CFR part 145 repair station return to service a higher assembly with EASA Form 1 if all the parts fitted on it are either returned to service with EASA Form 1 or a 8130-3 dual release?	
ANSWER	
No. A 14 CFR part 145 repair station located in the U.S. cannot return to service any component with EASA Form 1. Example: For used components, if all parts fitted have been received with either EASA Form 1 dual release or an 8130-3 dual release, then the higher assembly can be returned to service with an 8130 dual release.	

QUESTION 149	
Can a repair station with only line maintenance/geographic authorization have additional fixed locations?	
ANSWER	
No	

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

QUESTION 150	
Provide Cases of special use of EASA Form 1 and FAA Form 8130-3? For example: An EU based FAR-145 approved organisation in one of the 18 countries covered by the Agreement (Lufthansa in Frankfurt) maintaining an engine to be installed in an US registered aircraft (Delta Airlines) which during the course of maintenance work was installed with one or several components with a single FAA form 8130-3 release. Can this engine be released with single FAA form 8130-3 release?	
ANSWER	
Yes, based on the procedures outlined in the following matrix and instructions to complete a single release FAA Form 8130-3 single release and EASA Form 1 single release.	

Privileges of the Dual EASA and FAA certificated Maintenance organisation			
United States		Europe	
Release Document of Final Assembly: 8130-3 Dual Release		Release Document of Final Assembly: EASA Form 1 Dual Release	
Acceptable New Products/Articles: EASA Form 1 NEW 8130-3 NEW C of C Standard Parts		Acceptable New Components: EASA Form 1 NEW 8130-3 NEW C of C Standard Parts	
USED Products/Articles:		USED Components:	
Acceptable Used Products/Articles Release Document (input)	Final Assembly Release document (output)	Acceptable Used Components Release Document (input)	Final Assembly Release document (output)
8130-3 Single	8130-3 Single	Form 1 single	Form 1 Single
8130-3 Dual	8130-3 Dual	Form 1 dual	Form 1 Dual
Form 1 Dual	8130-3 Dual	8130 Dual	Form 1 Dual
Form 1 single	Form 8130-3 (see below U.S.)	8130 single	Form 1 (see below Europe)

United States

No 8130-3 dual release possible (one or more products/articles used accompanied by Form 1 single release).

In block 19 only check the box mentioning "Other regulation specified in block 13." Do not check box that states compliance to 43.9.

In block 13, the following text should be inserted:

"Certifies that the work specified in Block 12/13 was carried out in accordance with EASA Part 145 and in respect to that work the component is considered ready for release to service under EASA Part 145 approval no. _____.

This product/article meets part 43.9 requirements, except for the following items, and therefore is not eligible to be installed on U.S.-registered aircraft:"

(List the items)

EU-US Safety Agreement
Annex 2 Maintenance Questions and Answers

Europe

No EASA Form 1 dual release possible (one or more components used accompanied by Form 8130-3 single release).

In block 14a, check only the box mentioning "Other regulation specified in block 12." Do not check the box that states compliance to 145.A.50.

In block 12, include the following release statement:

"This civil aeronautical product has been [maintained, altered or modified, as appropriate] in accordance with United States Federal Aviation Regulations under FAA certificate no. _____.

This product/article meets 145.A.50 requirements, except for the following items, and therefore is not eligible to be installed on an EU-registered aircraft:"

(List the items)

QUESTION 151	
If a repair station wants to substitute a component that's not found on the article's type certificate (TC), what approval is needed on the substituted component?	
ANSWER	
Replacement parts not listed on the TC have to be an approved spare part per the TC holder's data and is listed on the IPC or Manufactured through a Parts Manufacturing Approval (PMA).	

QUESTION 152	
Is EASA approval needed for previously accepted FAA Form 337 on critical components that were exported to the European Union (E.U.) prior to the current Agreement?	
ANSWER	
Yes, the requirement for critical components has not changed with the new Agreement.	