

# CAA Response to AAIB Recommendation 2015-045



## Requirement

Following the tragic accident involving Hunter G-BXFI at the Shoreham airshow in 2015, the CAA was required to complete a number of actions in response to 31 AAIB Recommendations. One of the recommendations was:

### Safety Recommendation 2015-045

It is recommended that the Civil Aviation Authority require that the maintenance programme relating to an ex-military jet aircraft is transferred with the aircraft when it moves to another maintenance organisation to ensure continuity of the aircraft's maintenance.

The CAA final response to AAIB 2015-045 was:

### CAA Response

The CAA is developing a proposal for consultation with industry to introduce a new requirement into BCAR Section A to require a maintenance programme to be transferred with an ex-military jet aircraft if it moves to a new maintenance/continuing airworthiness management organisation, or new owner/operator.

Subject to the outcome of the process of industry consultation, the CAA intends to implement this requirement by April 2018.

Since the recommendation was made, the CAA has:

- Consulted with the continuing airworthiness organisations responsible for managing ex-military jets.
- Established the data required to be transferred to ensure continuity of the aircraft's maintenance.
- Reviewed the regulatory framework against the EASA requirements (Part M, Subparts F and G).
- Published an amendment to BCAR Section A (Issue 8, Amendment 1 of 15 December 2017), containing new requirements for the transfer of maintenance data and records between aircraft owners and operators.

## Analysis

The transferring of Aircraft Continuing Airworthiness Records between CAMO's is required under the EASA system for certificated aircraft (e.g. EASA Part M, M.A.307 M.A.714). The transfer of Maintenance Programmes is not. Industry consultation reinforced this position with CAMOs unwilling to accept another organisations' programme due to the possibility it could be incomplete or inaccurate. Investigation by the CAA has determined that the EASA framework is based on methodology recognised in many human factors models as a strategy for preventing latent failure, systematic errors, improving error capture (e.g. SHEL, The Reason Model) and is incorporated in ICAO, EASA and CAA publications. An organisation using a previous

maintenance programme as a basis for a new programme could mistakenly incorporate previous errors and omissions using the justification that it was “approved” data.

On this basis, the CAA has not required the transfer of maintenance programmes.

The CAA has implemented a regulatory framework that mirrors the EASA system to require that all the Aircraft Continuing Airworthiness Records are transferred when the aircraft moves to a new owner/operator. The new operator is forced to develop, review and approve a new maintenance programme. This ensures any specific tasks linked to the type and nature of operation under the new CAMO are captured (e.g. calendar periods, operational requirements, change in utilisation) and that an appropriate “bridging” or “transfer” inspection takes place.

This process necessitates a full airworthiness review (rather than an acceptance of the previous operator’s documentation) to potentially correct any deficiencies in the previous programme and ensure that the C of V remains valid.

Once developed, the new maintenance programme is approved either by the CAA or the CAMO. For the CAMO to gain the privilege to develop or amend maintenance programmes (indirect approval) an application must be made to the CAA and the indirect approval procedures must be separately approved.

Additionally, where an organisation is granted an A8-25 CAMO approval to manage an aircraft and develop a maintenance programme, the approval is limited to a **category** and a specific **type** (e.g. **category**: *Aeroplane, single turbine engine, unpressurised not exceeding 5700 kg*, **type**: BAe Jet Provost). This ensures the new maintenance organisation has a sufficient understanding of the aircraft and its maintenance regime from which to develop their own maintenance programme.