

PART M AND THE BGA AIRWORTHINESS ORGANISATION

Part M or, to give it its full title, Part M of Regulation EC 2042/2003, is the European regulation that defines how the continuing airworthiness of aircraft must be managed within the European Aviation Safety Agency (EASA) environment. Part M now applies to all EASA aircraft including sailplanes.

As all inspectors and most owners will be aware, the BGA has a long-established airworthiness management and maintenance organisation, which has now been adjusted to accommodate the Part M requirements and costs. Funded through the annual BGA C of A or ARC fee, this fundamentally volunteer manned organisation maintains a high level of gliding airworthiness rigour and focus on safety while meeting the needs of BGA clubs and thousands of individuals.

In the August/September 2009 edition of S&G, the article 'Part M – How to Stay Airworthy' explained what glider owners need to know to comply with Part M. Other more detailed guidance exists on the BGA website. What follows is a description of a number of changes to the BGA airworthiness organisation brought about by Part M that all owners and inspectors need to be aware of.

Annex 2 – Nothing New

The BGA airworthiness process and owners' interface to the BGA airworthiness organisation remains unchanged for Annex 2 gliders. The CAA has seen no need to change the status quo of these arrangements. Annex 2 gliders are unaffected by the changes described here.

The BGA Airworthiness Organisation and BGA Inspectors - Part M

Part M has brought about a number of significant organisational and process changes. The actual airworthiness standards, however, are very similar to those that have always been required. The difference with Part M is that the CAA is involved in a whole-system audit process. BGA inspectors can be expected to formally demonstrate a reasonable understanding of and compliance with Part M and with what are almost universally common airworthiness standards.

Organisation and Process Changes

BGA inspectors are authorised under the BGA Part M subparts F and G approvals rather than nationally by the CAA. They can only work on, certify or issue an ARC to EASA gliders and other aircraft that are within the BGA airworthiness organisation and therefore receiving BGA Airworthiness Support.

All gliders in the UK are currently deemed to be within the BGA airworthiness organisation. However, this is about to change. From the 1st January 2010:

- Gliders and other aircraft with an ARC issued by the BGA (or with an *initial* ARC issued directly by the CAA) that is current or which has expired within the previous 3 months, are automatically within the BGA airworthiness organisation. *We estimate that this represents the situation for well over 90% of owners who will therefore be unaffected by the changes*
- Owners whose ARC does not meet the above criteria but who wish to use the services of any volunteer or professional BGA inspector, or who require access to BGA airworthiness information and support, will first need to bring their glider or other aircraft within the BGA airworthiness organisation by purchasing the BGA Airworthiness Support Package which includes the fee for a BGA issued ARC. The ARC component can be used anytime within the following 12 months as payment for a BGA ARC. Special arrangements exist for owners of newly imported gliders whose ARC is issued by the CAA.

Owners of gliders and other aircraft within the BGA airworthiness organisation will be advised by email regarding BGA issued ARC expiry and renewal advice, airworthiness directives, airworthiness news, etc - providing the BGA has been supplied with the correct email address.

Owner or Inspector - Three Fundamentally Important Points to Remember

1. A BGA ARC is renewed by an authorised BGA Chief Engineer, not by the BGA office
2. A BGA ARC is only valid if payment has been made and a signed copy of the ARC is received by the BGA office, processed and then forwarded to the CAA, all within 10 days of the ARC renewal date. It is very important therefore to send the ARC copy to the BGA within 5 days of issue. Failure to complete the process accurately will contravene a requirement of Part M and therefore invalidate the ARC
3. Inspectors are not authorised by or insured by the BGA and its airworthiness approvals to carry out any airworthiness activity on gliders and other aircraft which are not deemed by the BGA to be within the BGA airworthiness organisation

ARC and Airworthiness Organisation - Frequently Asked Questions

1. I will need to renew my ARC. What do I need to do?

Refer to the BGA Airworthiness & Maintenance Procedures (AMP). The BGA ARC renewal process is available at www.glidering.co.uk/bgainfo/technical/ampmanual/2-11.pdf. Essentially this requires the owner to:

- Confirm that the aircraft maintenance is fully up to date, including **annual maintenance**
- Identify a BGA Chief Engineer – see www.glidering.co.uk/bgainfo/technical/contacts
- Ask for an airworthiness review – he or she will know what to do
- After the airworthiness review, the owner must ensure that
 - A signed copy of the ARC is submitted to the BGA and
 - Payment is submitted to the BGA for the ARC (except where an ARC has been pre-purchased as part of the BGA Airworthiness Support Package)

NB - no payment received or no signed copy of the ARC received by the BGA will invalidate the ARC.

2. My ARC lapsed a couple of months ago but I want to renew it. What do I do?

No problem. Gliders and other aircraft with an ARC issued by the BGA (or with an *initial* ARC issued directly by the CAA) that is current or which has expired within the previous 3 months, are automatically within the BGA airworthiness organisation. To renew, see FAQ 1 above.

3. What if my BGA ARC expired more than 3 months ago?

Before a BGA inspector can work on the glider to complete any maintenance or carry out the Airworthiness Review for ARC renewal, you first need to bring the glider into the BGA airworthiness organisation. See FAQ 5 below.

4. Will I be advised before my BGA ARC expires?

Yes. Providing your glider is in the BGA airworthiness organisation and the BGA has your email details

5. I don't have or don't need a BGA issued ARC, but I want to use a BGA inspector. Where does this leave me?

You will need to bring your glider into the BGA airworthiness organisation by signing up for the BGA Airworthiness Support Package which will bring the glider into the BGA airworthiness system for 12 months. You can use the ARC component at any point in the following 12 months if required.

6. I don't actually own the glider. Can I still pay for BGA Airworthiness including ARC?

Yes. The key point is that the glider must be identified when the payment is made.

7. Is this '1st Jan 2010' change more expensive?

No – the fee for BGA Airworthiness Support Package including ARC for a glider is still £95. £21 of that is sent to the CAA and the remainder, essentially the same amount as previously charged for a BGA C of A, contributes to supporting the BGA airworthiness organisation and payment of associated CAA approval fees.

8. What if my glider has not been transitioned yet?

There are special arrangements for gliders with long expired ARCs or which have not been transitioned – please see the AMP www.gliding.co.uk/bgainfo/technical/ampmanual.htm for details.

9. I'm an inspector. How do I know whether a glider is in or out of the BGA airworthiness organisation?

The solution is to check the existing ARC against these requirements. If the glider has:

- A valid ARC issued by the BGA (UK.MG.0279 appears in the ARC number)
- or
- An initial ARC issued directly by the CAA
- or
- Either of the above that expired within the previous 3 months, it is deemed to be within the BGA airworthiness organisation, and therefore has access to BGA Airworthiness Support.

- If the glider does not have an ARC as described above, you will need to ask the owner for proof that the aircraft owner has brought the aircraft within BGA Airworthiness Support. This proof will be in the form of a document issued by the BGA which will identify the aircraft and the BGA Airworthiness Support validity dates.

Without one or other of the above, a BGA inspector is not authorised, or insured by the BGA, to certify or work on the aircraft.

10. I've just imported a glider. Do I need to bring the glider into the BGA airworthiness system?

A newly imported glider will have its ARC issued or approved directly by the CAA, therefore the glider will be deemed to be within the BGA airworthiness organisation for the validity of the CAA issued

ARC and for 3 months following expiry. The BGA needs the glider details from the owner to ensure that the owner has access to BGA Airworthiness Support for that glider.

If on initial import only and prior to issue of the CAA ARC a BGA inspector is needed to certify maintenance on the aircraft, before the work takes place the owner will need to notify the BGA office in writing and receive confirmation that the glider has access to BGA Airworthiness Support. There is no fee.

Complex Maintenance Tasks

Part M has specific requirements relating to what EASA calls 'Complex Maintenance Tasks'. These tasks are described within an appendix to Part M subpart F. The BGA has produced guidance material (Leaflet 2-13) to help owners and inspectors establish whether a maintenance task is complex or not.

Under Part M, complex maintenance tasks on gliders can only be completed and signed for by a person specifically authorised by a subpart F approved maintenance organisation such as the BGA.

This means that BGA inspectors can only carry out complex maintenance tasks with specific prior authorisation from the BGA. Inspectors who need to regularly complete complex tasks will need to hold a BGA Part M 'List 1' site approval. 'List 1' sites have completed a rigorous approval process and are subject to ongoing audit. These sites pay a single annual fee for this approval.

So what about the vast majority of BGA inspectors who do not need to be 'List 1' approved? Any BGA inspector can apply to the BGA for authorisation to carry out an occasional complex task within the scope of their inspector rating and the resources available to them. The information is in Leaflet 2-13. There is a minimal fee for this approval which covers the initial BGA quality management work. If a site visit is required by the BGA Quality Manager, there will be a further fee to contribute to the additional quality management costs. The number of complex maintenance task authorisations available to each inspector will be limited. 'List 1' site approval is available to those who need greater flexibility.

Component Maintenance

Component maintenance and overhaul can result in components moving from one aircraft to another. An EASA Form 1 is required on any component that is fitted to an airframe other than the original. In due course the BGA will have a component maintenance approval in place which will permit the issue of an EASA Form 1 by authorised inspectors who will have received specific training.

Further Information

- Details of how to renew a BGA ARC are at www.glidering.co.uk/bgainfo/technical/ampmanual/2-11.pdf
- Advice regarding complex maintenance is at www.glidering.co.uk/bgainfo/technical/ampmanual/2-13.pdf
- Details of all fees are at www.glidering.co.uk/forms/bgafees.pdf