



Now that almost all the UK EASA glider fleet has made the transition to a non-expiring EASA Certificate of Airworthiness, refreshed each year by the renewal of an Airworthiness Review Certificate, owners and maintainers may find it helpful to have a brief update on the rationale behind current BGA maintenance policy.

The BGA has been awarded an internationally recognised approval for aircraft maintenance, known as Part M Subpart F. This is in addition to the Continued Airworthiness Management Organisation (CAMO) approval gained by the BGA earlier this year. The two approvals are complementary to each other and basically allow the BGA to support the UK glider fleet as it has done over many years. In order to qualify for Part M Subpart F approval (maintenance activity) the BGA had to demonstrate to the satisfaction of the UK CAA that it has the capability to carry out complex repairs to very sophisticated composite structures. Clearly the BGA as such does not repair any gliders so it invited the professional glider repairers to join the BGA approval system to the benefit of both. In simple terms, the repairers benefited from using the new BGA Exposition and procedure set (known as AMP leaflets) without having to invest a massive amount of time familiarising themselves with the European requirements, writing a company exposition, developing a working procedure set and hosting regular audits by the local CAA surveyor. In return the BGA as a whole can demonstrate its ability to carry out and properly control complex repairs. To date a number of companies have joined the BGA scheme to the satisfaction of the BGA Quality system and the local CAA surveyor. These companies are known as List 1 sites in the BGA Exposition. Repair organisations can join or leave List 1 as they wish. However, before a company can be added to the BGA exposition as a List 1 site it must operate in a way that ensures compliance with Part M Subpart F. It follows that any company or individual who is working in strict compliance with the BGA exposition and associated AMP set will also meet the requirements of Part M and, subject to a visit by the BGA Quality Manager and Local CAA surveyor, can join List 1. These companies can carry out as many complex repairs as they wish without any further notification to the BGA or CAA. However, it is very important that List 1 companies remain fully compliant with the requirements of Part M Subpart F and, in order to establish this to the satisfaction of the UK CAA, the BGA Quality Manager will carry out regular audits. The CAA will also develop its own surveillance plan for List 1 sites.

Deeply rooted within the BGA ethos is the need to enable suitably qualified gliding club members to carry out maintenance in support of the gliding movement. This is the whole basis of the BGA Inspector approval system from its inception many years ago. Not all maintenance or repairs are carried out by professional repairers and, under changes brought about by EASA, the BGA needed to make provision for clubs and smaller repair organisations to carry out complex repairs. It goes without saying that these repairs must also be carried out to the same standard as any other repair by a professional organisation. When the BGA uses the word "standard" we not only mean the physical repair but also the

supporting technical details as well. Issues such as workshop cleanliness, environmental conditions, recording critical processes such as post curing heat treatment, positive control over life-limited substances such as structural resins are all as important as the actual repair itself.

Repairers or individuals who only carry out a few complex repairs per year can do so under the BGA approval where specifically authorised following application. These BGA inspectors will not be subject to regular BGA or CAA surveillance audits, but will be asked to make an application to the BGA each time they need to carry out a complex maintenance task. The BGA Quality Manager will review each application and decide on the appropriate course of action. This will range between approving the repair by post without further involvement, to specifying a pre-repair audit to verify that all of the necessary controls are in place before work commences. Clearly, this system is not designed to short-cut or dilute the level of control provided by List 1 sites, but it is designed to permit competent work to take place at a low volume without the complication of full List 1 status.

The BGA has to consider the interface between these two systems running in parallel. It would be wholly inappropriate for an inspector to build up a level of complex maintenance task activity to the extent where throughput matches a List 1 site. This is not the intention. Should this occur the inspector will be encouraged to move to List 1 status. The threshold for this is not fixed and at this time we have settled on something between 3 and 6 complex repairs per year dependant on the volume and scope of the complex maintenance activity.

Much has been said about List 1 sites but we must not forget the average BGA Inspector who supports by far the largest percentage of the BGA fleet. After the 28th September 2009, without EASA Part M Subpart F approval, the BGA Inspector approval (which is a BGA company approval, not a national approval or EASA approval) would have ceased to be valid and could no longer be used to certify maintenance on any EASA glider. Our recently acquired Part M Subpart F approval, which permits BGA inspectors to operate within the revised and Part M compliant BGA airworthiness organisation, means that we can continue to employ the system that we have enjoyed and benefited from over many years.