TECHNICAL NEWS SHEET

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Self Declared Maintenance Programs (SDMP)
An introduction for BGA Inspectors\owners

Read this first – there are further details in BGA AMP Leaflet.

1) Overview

This only applies to aircraft regulated by EASA. The use of this new maintenance proforma will become a requirement in October 2019 to replace the existing GMP. It has in fact been in implementation, particularly for light aircraft, including tugs, for the past two years. (Thus, tug issues are not raised herein, but the AMP Leaflet provides guidance). This implementation of existing EASA/EU regulation has been phased over that time. While this legislation was generated by EASA/EU, it has been enshrined in law for about two years now, and therefore precedes and is unaffected by BREXIT.

The CAA remains of the view that this is a necessary update and indeed the BGA feels that it is a deregulation that aircraft owners will benefit from and encourage owners to formally get involved in managing their own maintenance. It provides several freedoms and flexibilities compared to the system currently in place. However, these options need to be justified in detail and hence the somewhat longer proforma (called BGA SDMP 267) compared to the old BGA 267 form.

2) What does it achieve?

The concept is that of deregulation through owner responsibility and awareness. Compared to the previous BGA GMP, the SDMP gives the owner more responsibility and with it some flexibility as to how some recommended scheduled maintenance can be managed (known as deviations from recommended maintenance). This will be particularly useful for motor gliders and tugs, which have more scheduled maintenance and lifed items than most sailplanes. The owner becomes responsible for the maintenance program and thus signs for it.

3) How does this change the inspector's relationship with the owner?

Your owner has probably had very little to do with your current GMP or previous LAMP maintenance program that, as a BGA inspector, you use to maintain his/her aircraft. These programs were updated during the transition process into EASA in 2008 and have (hopefully) continued their 'customisation' over the intervening years.

The SDMP makes the owner, rather than the inspector, responsible for the maintenance program. Unless the owner has a lot of airworthiness knowledge, the BGA recommends maintenance extensions and/or concessions, known formally as deviations. Many of these, such as: extending the life of seat harnesses, propellers, fuel/oil/hydraulic lines and engines etc are widely supported in the BGA CAMO. Any such should be drawn to attention, discussed and clarified between the inspector and the owner during the performance of the annual maintenance and ARC. **Understand that if you, the inspector, do not find the parts to be in an acceptable condition, or the approach is unwise then no deviation is possible.**

4) What is a Self Declared Maintenance Program?

You will recognise the core of the old GMP in the new BGA SDMP 267 as an expansion of the existing BGA 267. It is expanded with greater detail (expanded from 2 to 5 pages) so an owner understands what they are taking responsibility for, rather than the previous abbreviated 267 form. But the process has essentially been retained. EASA has adopted the modified BGA GMP as the 'Minimum Inspection

Programme' for all sailplanes and powered sailplanes in EASA. Our success in delivering this proforma across Europe should not be underestimated, as it enables us to retain the totality of our practices.

Given the complexity of modern sailplanes (inc self launch and self sustain options) it is no longer possible to write a satisfactory 'generic' program for all diverse types. This has been recognised for nearly a decade now, starting from the original 'Transition' process in 2008. Your current maintenance program should have been customised (and remained customised) using a BGA 280 form (to help you manage all of the data) and must be in the pink pages of a new style logbook (to certify the data) of your current glider records.

The general layout follows the old 267 but with several new elements around its core as follows:

- New header pages, setting out identity of the aircraft and its components, the basis on which maintenance is established, identifies the range of additional equipment and usage beyond the basic programme, and identifies the owner particularly if they engage in pilot owner self-authorised maintenance.
- There follows several signature blocks, including acceptance by the owner and a statement of the issue number of this maintenance programme (this first issue being No. 1)
- The core of the document is a reformatted BGA 267 Items 1-89.
- At the base of the maintenance schedule there are two additional sections covering what used to be entries 'Item 90 onwards' in the original BGA 267.
- The first covers mandatory additional requirements much in the image of a BGA Form 280 (which will provide a very sound introduction to this).
- The second covers any deviations to the manufacturer's recommendations. There are several 'regular' entries to this that the BGA supports in respect of straps, release mechanisms and, also to various engine components as applicable.
- Final signature block remains unchanged at the base of the document.

5) Completion of a Self Declared Maintenance Program (BGA SDMP 267)

In the past this was referred to as 'customising' the old BGA GMP. The new BGA SDMP 267 provides all the formatting and has been done for you. All you need to do is enter the relevant data for your aircraft and make the declarations. You should hold all the data from the Flight and Maintenance Manuals, TCDS, all EASA AD, all State of Design AD, SB, TN, BGA inspections and all known in-service issues (BGA compendium for gliders and powered sailplanes considered). Ideally these would have been compiled into your Form 280 or the Pink pages of your EASA compliant logbook.

Further, you may already have this data from your up-to-date GMP or CAA LAMP (for light aircraft). This should include all up-to-date Airworthiness Directives, scheduled maintenance and lifed items to be added to your new BGA SDMP 267. In effect, you are drawing down a large sector of information previously recorded in the BGA Form 280 into the maintenance programme itself. From this data you will be able to ensure that all life limited items: some airframes, hooks, engine, fuel/hydraulic lines, cables, seat harnesses, recurring Airworthiness Directives and BGA mandatory maintenance should be found, listed and actioned appropriately for your aircraft.

NOTES:

- If an airframe or equipment Manufacturer publishes a Technical Note (TN) or Service Bulletin (SB) that refers to a product improvement, without being substantiated or mandated by an AD, it is optional even if the TN or SB says it is mandatory.

- Historical AD's requiring a single action rectification in the past do NOT require to be listed, although you may care to confirm their embodiment.

- To be in the BGA CAMO you must meet BGA standards, so these requirements must be added to the SDMP. BGA CAMO requirements (like 8 yearly weighing and stick grips being firmly attached) can be found in the BGA inspections and Compendium part of the website. We have used our trend data to identify issues that the BGA believes have potential safety issues.

- You can also add optional technical notes plus any other data you think is relevant (like annual flarm or airspace software updates).

If you must start from scratch, you will need to consult and follow the processes detailed in the AMP. You must identify and enter the recurring AD's, ALI (Airframe Limitation Items are mandated lifed items eg. the airframe life and Tost hook life etc) and BGA inspection/requirements in the SDMP 267. You should also consult the up to date Flight and Maintenance manuals to identify any specific action necessary to the airframe type. This will become the Issue 1 master for that aircraft. The BGA intend to (eventually) have example SDMP for popular types on the BGA website.

There are declarations the owner must sign, plus he/she must be aware of, agree and sign for any deviations listed. Once complete, the inspector signs the CRS in the normal way. If there are no deviations, then the owner does not have to resign the declaration every year.

5) Deviations

Where the owner decides he/she does not want certain recommended maintenance to take place, he/she can sign the deviation section of the SDMP and take responsibility for deviating from the item. **This cannot apply to ADs, Airframe ALI and for all BGA CAMO requirements**. The inspector, at the annual maintenance, must be satisfied that the items to be deviated from are still in a satisfactory condition for their intended purpose and that all annual maintenance on that item has been performed. If the inspector finds that the item to be deviated on is not in satisfactory condition, the inspector cannot sign the Certificate of Release to Service (CRS) required at the Annual maintenance. Whatever the nature of the deviation, it has to be agreed with you, the inspector. While all deviations are the responsibility of the owner and not you, the certifying inspector, he needs your agreement the items to be deviated are airworthy.

Deviations should not be seen solely as a convenience or money saving exercise but require careful thought of the engineering justification and safety implications prior to the owner taking that responsibility. If an owner is uncomfortable with the responsibility of deviations, then do not have any deviations.

6) ARCs

When performing an ARC on an aircraft on the SDMP, as well as checking the SDMP for compliance, attention needs to be paid to deviated items to ensure that the SDMP is not affecting airworthiness. For instance, if the recommended life of a set of straps has been extended by way of a deviation, inspecting the straps more closely than usual would be prudent.

7) Timescales and anticipation of renewals

For Sailplanes, Sustainers, Self Launching Sailplanes (engine/airframe hours are entirely independent and no longer subject to legacy 50/150/6monthly checks), every annual interval. A tolerance of one month or 10 hours, as applicable, may be applied. ADs cannot be extended ever.

However, the next interval shall be calculated from the date/hours originally scheduled (without the tolerance). Note: the CAA have agreed the annual maintenance and ARC retains its 90 day anticipation period if required.

For TMG, they are are no longer subject to legacy 50/150/6monthly checks but they are subject to 100 hourly checks based on the SDMP checklist.

Conclusion
This is a CAA/EASA deregulation that ensures owners will have a lot more freedom to ensure maintenance is proportional to how the aircraft is used and stored. It also defines very clearly the role and responsibilities of aircraft owners. Please read the AMP document about this for further detail.

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