



International
Civil Aviation
Organization

Organisation
de l'aviation civile
internationale

Organización
de Aviación Civil
Internacional

Международная
организация
гражданской
авиации

منظمة الطيران
المدني الدولي

国际民用
航空组织

WHEN replying please quote:

Ref.: NT-N1-11.6 — **E.OSG-NACC96746**

3 April 2023

To: States, Territories and International Organizations

Subject: **First Deliverable – Comparison Document Version 0 on Approved Maintenance Organizations Regulatory Framework Comparison Project**

Action
Required: **Your comments by 28 April 2023**

Dear Sir/Madam,

As part of the many projects to help the States enhance safety oversight and effective implementation of the Standards and Recommended Practices (SARPs) within the CAR Region, I wish to present the first deliverable of the Regulatory Framework Comparison Project related to Approved Maintenance Organizations (AMOs), Version 0.

The ICAO NACC Regional Office is grateful for the commitment and active participation of your authorities' personnel during the virtual meetings of this phase of the project and especially to this Project "Champion States/International Organizations": Dominican Republic, United States, ALTA, EASA and IATA, for the continuous support.

Version 0 of the Regulatory Framework Comparison Document for the AMOs (**attached**) is the product of the analysis of four master regulations used in the NAM/CAR Regions: Model Civil Aviation Regulations (MCARS), European Aviation Safety Agency (EASA), Master Civil Aviation Regulations (MRACs), and Latin American Aviation Regulations (LARS), and of their compliance with ICAO Standards and Recommended Practices (SARPs). This document is a useful tool for a better understanding and interpretation of the regulations, to foster initiatives among States for the acceptance of AMOs certificates, bilateral/multilateral agreements, and possible guidance for regulatory amendments. The document can also be found at the following webpage:

<https://www.icao.int/NACC/Pages/nacc-regionalgroup-ncmc.aspx>

I would also like to inform the continuation of the project with the comparison of the regulations related to Foreign Operators Approval, which is actually in the process of coordination with the subject matter experts supporting the project.

.../2

Please send your comments to the document no later than **28 April 2023**.

Accept, Sir/Madam, the assurances of my highest consideration.



Julio Cesar Siu
Acting Regional Director
North American, Central American and
Caribbean (NACC) Regional Office

Enclosure: *As indicated*

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Cap. Peter Black, IFALPA CAN/Arctic
Cap. Ron Hay, IFALPA US/CEP
Mr. Duncan Auld, IFATCA
Ms. Patricia Gilbert, IFATCA Americas

jedson84@gmail.com; consuelab28@gmail.com;
edwin.kelly@dca.gov.aw; Stateletters@dca.gov.aw;
DirectorGeneral@caabahamas.com;
alexander.ferguson@caabahamas.com;
shemeka.forbes@caabahamas.com;
blackmanf@tourism.gov.bb;
Francine.Blackman@barbados.gov.bb;
civil.aviation@Barbados.gov.bb; Tracey.Forde-
Bailey@barbados.gov.bb;
nigel.carter@civilaviation.gov.bz;
director@civilaviation.gov.bz;
felix.meunier@tc.gc.ca; lisa.lanthier@tc.gc.ca;
tc.internationalaviation-aviationinternationale.tc@tc.gc.ca;
civilair@gobiernu.cw; Leslie.Laplace@gobiernu.cw;
pstourism@dominica.gov.dm;
ceo@daspa.dm; naturebbard@gmail.com;
seanjmatthew@gmail.com;
awhittier@eccaa.aero; awhittier@eccaa.aero;
contact@eccaa.aero;
yves.tatibouet@aviation-civile.gouv.fr;
patrick.pezzetta@aviation-civile.gouv.fr;
philippe.versi@aviation-civile.gouv.fr;
Frederic.danloux@aviation-civile.gouv.fr;
ps@moid.gov.gd;
direction.generale@ofnac.gov.ht; josephlaurent.dumas@ofnac.gov.ht;
ljdumas.hcaa@yahoo.com; hantz.celestine@ofnac.gov.ht; fred.brisson@ofnac.gov.ht;
nicolas.ntahiraja@ofnac.gov.ht; ginalouisjuste.laborde@ofnac.gov.ht;
jeanmarc.flamberg@ofnac.gov.ht; Jacques.boursiquot@ofnac.gov.ht;
marc.paulemon@ofnac.gov.ht; marcpaulemon@gmail.com;
rohan.campbell@jcaa.gov.jm; Ann-
Marie.ToomerGayle@jcaa.gov.jm; info@jcaa.gov.jm;

StatelettersNL@minienw.nl;

Marsha.henderson@stkitstourism.kn; Kenrick.duncan@gov.kn;
Royston.griffin@gov.kn; civilaviation@gov.kn;
augustus.cadette@govt.lc; eustace.cherry@govt.lc;

moel@gov.vc; tourism@gov.vc;

louis.halley@sintmaartengov.org;
fregis@caa.gov.tt; kherreira@caa.gov.tt;
tmartin@caa.gov.tt; ccourmand@caa.gov.tt;
rsylvester@caa.gov.tt; srarnbaran@caa.gov.tt;

james.ball1@dfi.gov.uk; maria.boyle@airsafety.aero;
alison.thomas@airsafety.aero;

marcus.doller@airsafety.aero;
Mathew.a.clayton@faa.gov; 9-AWA-API-IGIA@faa.gov;
norma.v.campos@faa.gov;
rechevarne@aci-lac.aero; asistente@aci-lac.aero; aci-
lac@aci-lac.aero; info@aci-lac.aero;
jrbotelho@alta.aero; vcorrieri@alta.aero;
mcedeno@alta.aero;
dg@canso.org; simon.hocquard@canso.org;
carlos.cirilo@canso.org;
javier.vanegas@canso.org; lamcar@canso.org;
pauline.yearwood@caricom.org;

officemanager@cassos.org; cleo.samuels@gmail.com;
luc.tytgat@easa.europa.eu; thomas.mickler@easa.europa.eu;
alfonso.arroyo@easa.europa.eu; jose-luis.penedo-del-
rio@easa.europa.eu; Eleonora.ITALIA@easa.europa.eu
ruizjo@iata.org; marquez@iata.org;
kedwards@ibac.org;
eb@ifaima.org; barbara@ifaima.org; igor@ifaima.org;
priyadoobaree@ifalpa.org;
rodlypchuk@ifalpa.org;
avioneto@hotmail.com;
chriswitt18@gmail.com;
peter.black@alpa.org;
ron.hay@alpa.org;
pcx@ifatca.org; duncan.auld@ifatca.org;
evpama@ifatca.org; office@ifatca.org;
trish.gilbert@ifatca.org;

cc: Dr. Didacus Jules, OECS
Mr. Karim Hodge, Anguilla
Mr. Thomas Dunstan, Bermuda
Ms. Paulette Cruz, British Virgin Islands
Mr. Richard Smith, Cayman Islands
Mr. Albert Anderson, Cayman Islands
Mr. Joseph Irish, Montserrat
Mr. Peter Forbes, Turks and Caicos Islands
Mr. Marcus Doller, ASSI, United Kingdom
Ms. Alison Thomas, ASSI, United Kingdom
NACC Webmaster

didacus.jules@oecs.int;
Karim.Hodge@gov.ai;
tdunstan@bcaa.bm; kadburgess@bcaa.bm;
pcruz@bvaa.com;
civilaviation@caacayman.com;
Richard.smith@caacayman.com;
alastair.robertson@caacayman.com;
albert.anderson@caymanairports.com;
irishjl@gov.ms; mcw@gov.ms;
pforbes@tcicaa.tc; pthomas@tcicaa.tc;
marcus.doller@airsafety.aero;
alison.thomas@airsafety.aero;
webmasternacc@icao.int;

ATTACHMENT/ADJUNTO

Source	Annex 8	Applicability
	Airworthiness of Aircraft	
	Twelfth edition 2018	
	Chapter 6	

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	MRAC/BCAR	Remarks
Section	Details					
6.1	The Standards of this chapter are applicable to the approval of organizations involved in the maintenance of aircraft, engines, propellers and associated parts. Approval certificates issued before 5 November 2020 shall be amended before 5 November 2022 to ensure compliance with the requirements in 6.2.3.	6.1 GENERAL 6.1.1.1 APPLICABILITY (a) This part prescribes the requirements for issuing approvals to organisations for the maintenance, overhaul, modification, repair, and inspection, of aircraft and aeronautical products and prescribes the general operating rules for an AMO. Note: As of 05 November 2020, the term “maintenance” will change to “continuing airworthiness.” 6.2.1.1 APPLICABILITY (a) This subpart prescribes the requirements for the certification of a maintenance organisation and the continued validity of the AMO certificate issued by [STATE]. 6.2.1.2 GENERAL (a) No person may operate as an AMO without, or in violation of, an AMO certificate and operations specifications issued under this part.	Regulation (EU) No 1321/2014 Article 4 Approvals for organisations involved in the continuing airworthiness [of aircraft]. 1. Organisations involved in the continuing airworthiness of aircraft and components for installation thereon, including maintenance, shall be approved, upon their request, by the competent authority in accordance with the requirements of Annex II (Part-145), Annex Vc (Part-CAMO) or Annex Vd (Part-CAO), as applicable to the respective organisations. Regulation (EU) No 1321/2014 145.A.10 Scope This Section establishes the requirements to be met by an organisation to qualify for the issue or continuation of an approval for the maintenance of aircraft and components.	145.005 Application This regulation prescribes the requirements for the issuance of approvals to aircraft and aircraft component maintenance organizations and establishes the general operating standards for LAR 145 OMAs. When approval is granted, it applies to the entire organization headed by a manager in charge.	BCAR - 145.1 General a) These Regulations may be cited as the Belize Civil Aviation Regulations 145 (Approved Maintenance Organisation) b) No maintenance organization may advertise as an approved maintenance organisation until an Approval Certificate has been issued to that facility by the Director. c) An approved maintenance organisation shall not advertise in any manner whatsoever, any statement that is false or misleading. d) An advertisement by an approved maintenance organisation shall clearly state the certificate number of the approved maintenance organisation	1-Are them equivalent? The Area Experts agree: The regulations are equivalent. 2-Are them different? If so, please Explain. -NIL Additional information - Some States have declared that the updates of regulations as of 05 November is not 100% documented.
				During RPEA/17 held virtually from August 24 to 28, 2020, the definitions of "aircraft component", "maintenance compliance", "maintenance", "continuing airworthiness", "maintenance organization manual (MOM)" and "repair" were reviewed. The definition of "adequate airworthiness requirements" was also included.		

Source	Annex 8	Maintenance Organization Approval
	Airworthiness of Aircraft	
	Twelfth edition 2018	
	Chapter 6	

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	MRAC/BCAR	Remarks
Section		Details					
6.2	6.2.1	The Contracting State concerned shall define appropriate requirements for the approval of a maintenance organization in accordance with the Standards of this chapter.	6.2.1.6 ISSUANCE OF AN AMO CERTIFICATE (a) The issuance of an AMO certificate by [STATE] shall be dependent upon the maintenance organisation demonstrating compliance with the requirements of this part and the relevant safety management requirements of Part 1 of these regulations. (b) The Authority may issue an AMO certificate if, after investigation, it finds that the applicant: (1) Meets the applicable regulations and standards for the holder of an AMO certificate; and (2) Is properly and adequately equipped for the performance of maintenance, overhaul, modification, repair, and inspection of an aircraft or aeronautical product for which it seeks approval. 6.4.1.6 SAFETY MANAGEMENT (a) An AMO shall implement an SMS acceptable to the Authority, as prescribed in 1.6 of these regulations 1.6 SAFETY MANAGEMENT 1.6.1.1 APPLICABILITY (a) This subpart prescribes procedures applicable to safety management functions related to, or in direct support of, the safe operation of aircraft by: (1) Specified aviation safety service providers; and (2) Operators. Note 1: Safety management provisions for States are contained in ICAO Annex 19, Chapter 3, and relate to an SSP. Note 2: Within the context of these regulations, the term “service provider” refers to those organisations listed in 1.6.1.2 of this part and does not include international general aviation operators. Note 3: Safety management provisions for specified aviation service providers and operators are in ICAO Annex ICAO Annex 19, Chapter 4, and relate to SMS. Note 4: Safety management provisions pertaining to specific types of aviation activities are addressed in the relevant Annexes.	Regulation (EU) No 1321/2014 Article 4 Approvals for organisations involved in the continuing airworthiness [of aircraft]. 1. Organisations involved in the continuing airworthiness of aircraft and components for installation thereon, including maintenance, shall be approved, upon their request, by the competent authority in accordance with the requirements of Annex II (Part-145), Annex Vc (Part-CAMO) or Annex Vd (Part-CAO), as applicable to the respective organisations. 145.B.20 Initial approval (Regulation (EU) No 1321/2014) (PDF 414) 1. Provided the requirements of points 145.A.30(a) and (b) are complied with, the competent authority shall formally indicate its acceptance of the personnel, specified in points 145.A.30(a) and (b), to the applicant in writing. 2. The competent authority shall verify that the procedures specified in the maintenance organisation exposition comply with this Annex (Part-145) and verify that the accountable manager signs the commitment statement. 3. The competent authority shall verify that the organisation is in compliance with the requirements of this Annex (Part-145). 4. A meeting with the accountable manager shall be convened at least once during the investigation for approval to ensure that he/she fully understands the significance of the approval and the reason for signing the exposition commitment of the organisation to compliance with the procedures specified in the exposition. 5. All findings must be confirmed in writing to the organisation. 6. The competent authority shall record all findings, closure actions (actions required to close a finding) and recommendations 7. For initial approval all findings must be corrected before the approval can be issued. 145.B.25 Issue of approval 1. The competent authority shall formally	145.105 Approval A maintenance organization that complies with the requirements set forth in this regulation and that has paid the fees stipulated by the local State CAA and/or registration fees is entitled to LAR 145 approval at its various locations. 145.110 Certificate and scope of approval (a) The approval of an OMA is indicated in the certificate of approval issued by the CAA. (b) No person shall operate an OMA without a certificate of approval or in violation of such certificate and its scope. (c) The capabilities list should establish the scope and limitation of work covered by the approval through the certificate.	BCAR 145.17 Process to obtain a BCAR - 145 Approval Certificate (PDF 16) a) The Director may, after an evaluation of the application and subsequent inspection of the proposed facilities of the applicant, issue an approved maintenance organisation certificate to an applicant where he is satisfied that the applicant 1) meets the requirements of these Regulations; 2) has implemented all the procedures and specifications set out in his maintenance organization exposition; 3) is properly and adequately equipped to perform maintenance of Belizean aircraft or aircraft components for which he seeks approval; and 4) has paid all fees as prescribed by the Director. b) The Director shall not issue an approved maintenance organisation certificate 1) where the applicant i. does not meet the requirements of these Regulations ii. has provided incomplete, inaccurate, fraudulent or false information in applying for the approved maintenance organisation certificate; c) In order to obtain an approval certificate, the applicant shall undergo a certification process in accordance with following phases; 1) PHASE 1. Pre-application: It is the procedure that an applicant follows to receive the information concerning the granting of a BCAR - 145 AC. During this phase, the first meeting between the applicant and the Director takes place. In addition, there is an exchange of information about the service the applicant wants to provide and the guidelines set by the Director regarding standards, procedures, responsibilities, and attributions for that service, as well as information about the technical documents the applicant shall submit. 2) PHASE 2. Formal application: The applicant submits the application to the Director as BCAR - 145 Maintenance Organization for its approval. This phase includes an assessment to the management personnel, the schedule of events,	1-Are them equivalent? The Area Experts agree: The regulations are equivalent. 2-Are them different? If so, please Explain. NIL 3-Additional information - Regulations shows different methodologies of compliance to the ICAO SARPs, including but not limited to charts and attachments

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	MRAC/BCAR	Remarks
Section		Details					
			<p>Note 5: Basic safety management principles applicable to the medical assessment process of licence holders are contained in ICAO Annex 1. Guidance is available in ICAO Doc 8984, Manual of Civil Aviation Medicine.</p> <p>1.6.1.2 SAFETY MANAGEMENT SYSTEM – SERVICE PROVIDERS</p> <p>(a) The following service providers shall implement an SMS:</p> <p>(1) ATOs, approved in accordance with Part 3 of these regulations, that are exposed to safety risks related to aircraft operations during the provision of their services;</p> <p>(2) AOC holders, approved in accordance with Part 9 of these regulations, of aircraft;</p> <p>(3) AMOs, approved in accordance with Part 6 of these regulations, providing services to operators of aircraft engaged in international commercial air transport;</p> <p>(4) Organisations responsible for the type design or manufacture of aircraft, engines, or propellers;</p> <p>(5) ATS providers; and</p> <p>(6) Operators of certificated aerodromes.</p> <p>(b) The service providers listed in paragraph 1.6.1.2(a) of this subsection shall implement an SMS acceptable to the Authority that as a minimum shall:</p> <p>(1) Contain the components and elements prescribed in IS 1.6.1.2; and</p> <p>(2) Be commensurate with the size of the service provider and the complexity of its aviation products or services.</p> <p>(c) The SMS shall clearly define lines of safety accountability throughout the organisation, including a direct accountability for safety on the part of senior management.</p> <p>Note 1: Guidance on the implementation of an SMS is contained in ICAO Doc 9859, Safety Management Manual (SMM).</p> <p>Note 2: An SMS is also required by organisations involved in the type design or manufacture of aircraft, in accordance with ICAO Annex 8, and operators of aerodromes, in accordance with ICAO Annex 14, should a State have such service providers.</p>	<p>approve the exposition and issue to the applicant a Form 3 approval certificate, which includes the approval ratings. The competent authority shall only issue a certificate when the organisation is in compliance with this Annex (Part-145).</p> <p>2. The competent authority shall indicate the conditions of the approval on the Form 3 approval certificate.</p> <p>3. The reference number shall be included on the Form 3 approval certificate in a manner specified by the Agency.</p>		<p>and the handing over of the corresponding documents to the Director.</p> <p>3) PHASE 3. Evaluation: The Director goes through the documents submitted and informs the applicant about the discrepancies found, if any; if not, the Director issues the approval or acceptance of the application.</p> <p>4) PHASE 4 Technical demonstrations: The Director conducts an inspection of the maintenance organization of the applicant, its personnel, documents, procedures, facilities, and equipment, to verify if they match the ones established in the MOE.</p> <p>5) PHASE 5 Certification: Once the previous phases have been completed satisfactorily, the Director will issue a BCAR -145 AC with its ratings.</p> <p>d) No organization will be granted an approval to carry out any type of maintenance activities without concluding the certification process described in the previous paragraph(s).</p> <p>-</p> <p>BCAR 145.66 Safety Management System</p> <p>a) Effective 1st March 2012 a maintenance organization shall implement a safety management system acceptable to the BDCA that, as a minimum;</p> <p>1) Identifies safety hazards;</p> <p>2) Ensures that remedial action necessary to maintain an acceptable level of safety is implemented;</p> <p>3) Provide for continous monitoring and regular accessment of the safety level achieved, and</p> <p>4) Aims to make continous improvement to overall level of safety.</p> <p>b) A safety management system shall clearly define lines of safety accountability throughout maintenance organization, including a direct accountability of safety on the part of the senior management.</p>	
	6.2.2	<p>The issuance of a maintenance organization approval by a Contracting State shall be dependent upon the applicant demonstrating compliance with the applicable Standards of this chapter through compliance with appropriate requirements defined in accordance with 6.2.1 and relevant provisions contained in Annex 19 for such organizations.</p>		<p>145.B.25 Issue of approval</p> <p>1. The competent authority shall formally approve the exposition and issue to the applicant a Form 3 approval certificate, which includes the approval ratings. The competent authority shall only issue a certificate when the organisation is in compliance with this Annex (Part-145).</p> <p>2. The competent authority shall indicate the conditions of the approval on the Form 3 approval certificate.</p> <p>3. The reference number shall be included on the Form 3 approval certificate in a manner specified by the Agency.</p> <p>Regulation including SMS provisions are expected to be adopted at the end of 2021.</p>	<p>Chapter C: Safety Management System</p> <p>145.200 Safety Management System (SMS)</p> <p>(a) An OMA LAR 145 must establish, implement and maintain a safety management system (SMS) that fits the size and complexity of the organization which must be accepted by the local and registration CAA, where applicable.</p> <p>(b) An OMA LAR 145 should develop a plan to facilitate the implementation of the SMS.</p> <p>(c) The SMS framework should contain four components and twelve elements:</p> <p>(1) Safety policy and objectives</p> <p>(i) Management commitment;</p> <p>(ii) Accountability and responsibility for safety;</p> <p>(iii) Designation of key safety personnel;</p> <p>(iv) Coordination of emergency response planning, where appropriate;</p> <p>(v) SMS documentation.</p> <p>(2) Safety risk management</p> <p>(i) Hazard identification;</p> <p>(ii) Safety risk assessment and mitigation.</p> <p>(3) Safety assurance</p> <p>(i) Safety performance monitoring and measurement;</p> <p>(ii) Change management;</p> <p>(iii) Continuous improvement of the SMS.</p> <p>(4) Safety Promotion</p> <p>(i) Instruction and education;</p> <p>(ii) Safety communication</p>		<p>1-Are them equivalent? The Area Experts agree: The regulations are equivalent. Nonetheless</p> <p>2-Are them different? If so, please Explain. NIL</p> <p>3-Additional information - Regulations shows different methodologies of compliance to the ICAO SARPs, including but not limited to charts and attachments</p>

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	6.2.3	<p>The approval certificate shall contain at least the following information:</p> <p>a) the issuing authority and the name, title and signature of the person issuing the certificate;</p> <p>b) the maintenance organization's name and registered address;</p> <p>c) the maintenance organization approval reference number;</p> <p>d) the date of current issue;</p> <p>e) in the case of certificates of limited duration, the expiration date;</p>	<p>6.2.1.3 AMO CERTIFICATE</p> <p>(a) The certificate issued to an AMO by [STATE] will consist of two documents: (1) A one-page certificate for public display signed by the Authority; and (2) Operations specifications signed by the accountable manager and the Authority. (b) The certificate will contain the following items and will be on a form and in a manner as prescribed in IS 6.2.1.3: (1) The certificate number specifically assigned to the AMO; (2) The name and location of the principal place of business of the AMO; (3) The certification Statement of Authority; (4) The ratings issued to the AMO; (5) The period of validity; (6) The date of issue; and (7) The signature, printed name, and title of the appropriate Authority. (c) The operations specifications will contain the following items and will be on a form and in a manner as prescribed by the Authority: (1) The certificate number specifically assigned to the AMO; (2) The class or limited ratings issued in detail, including specific terms, conditions, and limitations; (3) The date issued or revised; and (4) Signature of the accountable manager and the Authority. (d) An AMO may perform maintenance, overhaul, modification, repair, or inspection on an aircraft or aeronautical product only for which it is rated and within the specific terms, conditions, and limitations contained in its operations specifications. (e) The certificate issued to an AMO shall be available on the premises for inspection by the public and the Authority.</p>	<p>145.B.25 Issue of approval Regulation ((EU) No 1321/2014) (PDF 416)</p> <p>1. The competent authority shall formally approve the exposition and issue to the applicant a Form 3 approval certificate, which includes the approval ratings. The competent authority shall only issue a certificate when the organisation is in compliance with this Annex (Part-145).</p> <p>Form 3-145 Approval certificate</p>	<p>145.110 Certificate and scope of approval</p> <p>(a) The approval of an OMA is indicated in the certificate of approval issued by the CAA. (b) No person shall operate an OMA without a certificate of approval or in violation of such certificate and its scope. (c) The capabilities list should establish the scope and limitation of work covered by the approval through the certificate.</p> <p>Maintenance Organization Approval Certificate-SRVSOP-F2-MIA</p>	<p>BCAR 145.20 Content of the Approval Certificate (PDF 17)</p> <p>a) An approved maintenance organization certificate issued in BCAR 145.15 shall consist of 1) a one page certificate signed by the Director set out in the approved maintenance organisation Standards; and 2) This BCAR -145 AC will specify the ratings approved in accordance with what is established in Table 1, Appendix A. The approved MOE in accordance with the BCAR -145 shall specify the scope of approval b) The approved maintenance organization certificate shall contain the 1) Certificate number specifically assigned to the approved maintenance organisation by the Director; 2) Name and location of the main place of business of the approved maintenance organisation; 3) date of issue and period of validity; 4) terms of the approval; and 5) signature of the Director c) An approved maintenance organisation may perform maintenance, preventive maintenance and modifications on Belizean aircraft or their associated aircraft components or parts thereof only for which it is rated and within the limitations placed in its Approval Certificate. d) The holder of an approved maintenance organisation certificate shall keep such certificate on the premises of the approved maintenance organisation prominently displayed in a place normally accessible to the public and the Director. e) Each AMO shall prepare and retain a current capability list approved by the Director. The AMO may not perform maintenance, preventive maintenance, or modifications on a component until the component has beenlisted on the capability list in accordance with this Regulation.</p>	<p>1-Are them equivalent? The Area Experts agree the regulations are not equivalent.</p> <p>2-Are them different? If so, please Explain.</p> <p>-In LARs, the certificate content requirement could not be evidenced and/or found</p> <p>3-Additional information</p> <p>-Regulations shows different methodologies of compliance to the ICAO SARPs, including but not limited to charts and attachments</p>

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	MRAC/BCAR	Remarks
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		f) the scope of approval, in relation to aircraft, component and/or specialized maintenance, and to the type of aircraft and components covered by the approval; and			145.110 Certificate and scope of approval (a) The approval of an OMA is indicated in the certificate of approval issued by the CAA. (b) No person shall operate an OMA without a certificate of approval or in violation of such certificate and its scope. (c) The capabilities list should establish the scope and limitation of work covered by the approval through the certificate.		
		g) the locations of the maintenance facilities, unless the information is included in a separate document referred to in the approval certificate.	IS 6.2.1.3	-			
	6.2.4	The continued validity of the approval shall depend upon the organization remaining in compliance with the appropriate requirements of 6.2.1 and 6.2.2.	6.2.1.7 DURATION AND RENEWAL OF AN AMO CERTIFICATE (a) An AMO certificate, or any portion of an AMO certificate, issued by the Authority to an AMO located either inside or outside [STATE] is effective from the date of issue until: (1) The last day of the 12th month after the date on which it was initially issued, subject to satisfactory compliance with the requirements of this part; (2) The last day of the 24th month after the date on which it was renewed, subject to satisfactory compliance with the requirements of this part; (3) The AMO surrenders the certificate to the Authority; or (4) The Authority cancels, suspends, revokes, or otherwise terminates the certificate. (b) The holder of an AMO certificate that has expired, has been surrendered by the AMO, or has been suspended or revoked by the Authority shall return the certificate and operations	145.A.90 Continued validity Regulation ((EU) No 1321/2014) (PDF 410) (a) An approval shall be issued for an unlimited duration. It shall remain valid subject to: 1. the organisation remaining in compliance with Annex II (Part-145), in accordance with the provisions related to the handling of findings as specified under point 145.B.50; and 2. the competent authority being granted access to the organisation to determine continued compliance with this Part; and 3. the certificate not being surrendered or revoked. (b) Upon surrender or revocation, the approval shall be returned to the competent authority.	145.140 Requirements to maintain the continued validity of the approval (a) Unless the approval has been previously cancelled or the OMA has resigned, the continued validity of the approval of a LAR 145 OMA depends on: (1) the OMA LAR 145 remaining in compliance with the requirements of these regulations; (2) the CAA of the certifying and/or registering State having access to the OMA LAR 145 to determine continued compliance with these regulations; and (3) the payment by OMA LAR 145 of any fee duly established by the State's CAA that granted the certification and/or registration.	BCAR 145.90 Continued Validity of Approval a) A certificate issued to an approved maintenance organisation by the Director shall be valid for the remainder of the month in which it was issued plus 12 months thereafter, unless 1) it is surrendered to the Director by the approved maintenance organisation; 2) it is suspended or revoked by the Director; 3) the holder of the approved maintenance organisation certificate no longer has a fixed base of operation; or 4) the holder of the approved maintenance organisation certificate no longer has the equipment or facilities to perform maintenance of Belizean aircraft or their associated aircraft components. b) The holder of an approved maintenance organisation certificate shall return the approval certificate to the Director where it: 1) is expired;	1-Are them equivalent? The Area Experts agree: The regulations are equivalent. 2-Are them different? If so, please Explain. NIL 3-Additional information - Regulations shows different methodologies of compliance to the ICAO SARPs, including but not limited to charts and attachments

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	MRAC/BCAR	Remarks
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			<p>specifications to the Authority within 5 working days of expiration, surrender, or receipt from the Authority of notice of suspension or revocation. (c) An AMO that applies for a renewal of its certificate shall submit its request for renewal no later than 90 days before the AMO’s current certificate expires. If a request for renewal is not made within this period, the AMO shall follow the application procedures for initial issuance as prescribed by the Authority.</p> <p>6.2.1.8 CONTINUED VALIDITY OF AN AMO CERTIFICATE</p> <p>(a) Unless the AMO certificate has previously been cancelled, suspended, or revoked, or has expired by virtue of exceeding any expiration date that may be specified in the certificate, the continued validity of the AMO certificate shall depend on:</p> <p>(1) An AMO remaining in compliance with the requirements of this part and the relevant safety management requirements of Part 1 of these regulations;</p> <p>(2) The Authority being granted access to the AMO’s facilities to determine continued compliance with the requirements of this part; and</p> <p>(3) The payment of any charges prescribed by the Authority.</p>			<p>2) is surrendered by the approved maintenance organisation; or</p> <p>3) is suspended or revoked by the Director.</p> <p>c) A valid approved maintenance organisation certificate shall continue to remain in force on condition that</p> <p>1) the holder of the approve maintenance organisation certificate maintains compliance with these Regulations;</p> <p>2) the Director is permitted access at any time, to the facilities of the approved maintenance organisation to conduct inspections to determine continued compliance with these Regulations; 3) the holder of the approved maintenance organisation certificate has not surrendered such certificate to the Director; and</p> <p>4) the approved maintenance organisation certificate has not been suspended or revoked by the Director.</p> <p>d) Where an approved maintenance organisation is no longer in compliance with these Regulations, the Director may suspend or revoke his certificate</p> <p>e) Where the holder of an approved maintenance organisation certificate wishes to renew his certificate, he shall</p> <p>1) apply to the Director in the prescribed form;</p> <p>2) submit his application no later than 60 days before the current certificate expires; and</p> <p>3) pay the prescribed fee</p> <p>f) The Director may, after an evaluation of the application for renewal of an approved maintenance organisation certificate referred to in paragraph (e) and inspection of the facilities of the approved maintenance organisation, renew the approved maintenance organisation certificate where he is satisfied that the applicant</p> <p>1) meets the requirements of these Regulations;</p> <p>2) has maintained all the procedures and specifications set out in is maintenance exposition;</p> <p>3) continues to be properly and adequately equipped to perform maintenance of Belizean aircraft or aircraft components for which he seeks approval; and</p> <p>4) has paid all fees as prescribed by the Director.</p>	

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	6.2.5	The maintenance organization shall notify the Contracting State which issued the maintenance organization approval of any changes to the organization’s scope of work, location or personnel nominated in accordance with this chapter.	6.2.1.11 CHANGES TO THE AMO AND AMO CERTIFICATE AMENDMENTS (b) To enable the Authority to determine continued compliance with this part, the AMO shall provide written notification to the Authority prior to, or within a time period determined by the Authority to be as soon as practicable after, changes to any of the following: (2) The location of the organisation; (3) Housing, facilities, equipment, tools, material, procedures, scope of work , and certifying staff that may affect the rating(s) issued; (7) The accountable manager; or (8) The list of management personnel as described in the AMO Procedures Manual.	145.A.85 Changes to the organisation (Regulation (EU) 2015/1088) (PDF 410) The organisation shall notify the competent authority of any proposal to carry out any of the following changes before such changes take place to enable the competent authority to determine continued compliance with this Part and to amend, if necessary, the approval certificate, except that in the case of proposed changes in personnel not known to the management beforehand, these changes must be notified at the earliest opportunity: 1. the name of the organisation; 2. the main location of the organisation; 3. additional locations of the organisation; 4. the accountable manager; 5. any of the persons nominated under point 145.A.30(b); 6. the facilities, equipment, tools, material, procedures, work scope, certifying staff and airworthiness review staff that could affect the approval.	145.155 Reportable changes in the OMA (a) For each of the following cases and in order for the CAA that granted the approval to determine continued compliance with this Regulation, and, if necessary, to amend the certificate of approval and the capabilities list as applicable, the OMA LAR 145 must inform the CAA of any proposed changes before they are made: (1) organization name; (2) organization location; (3) additional locations of the organization; (4) the manager in charge; (5) any key positions required in section 145.205 (c) of these regulations; and (6) any changes in facilities, equipment, tools, procedures, scope of work and certification personnel that may affect the approval. (b) The CAA that granted the certification will indicate the conditions under which the OMA LAR 145 may operate during these changes or will determine whether the approval should be suspended or cancelled.	BCAR 145.85 Changes to the BCAR – 145 AMO (PDF 33) a) Where the holder of an approved maintenance organisation certificate wishes to make changes to his certificate in relation to: 1) the name of the organisation; 2) the location of the organisation; 3) the housing, facilities, equipment, tools, material, procedures, work scope and certifying staff that could affect the approved maintenance organisation rating; 4) the ratings held by the approved maintenance organisation, whether granted by the Director or held through an approved maintenance organisation certificate issued by another Contracting State; 5) additional locations of the organisation; 6) the Accountable Manager; and 7) the list of management personnel identified in the MOE, he shall provide written notification to the Director of his intention to make such change at least 7 days before the submission of the application for the amendment.	1-Are them equivalent? The Area Experts agree: The regulations are equivalent. 2-Are them different? If so, please Explain. NIL 3-Additional information - Regulations shows different methodologies of compliance to the ICAO SARPs, including but not limited to charts and attachments
	6.2.6	Where a Contracting State accepts, in whole or in part, a maintenance organization approval issued by another Contracting State, it shall establish a process for the recognition of such approval and successive changes. In such a case, the recognizing Contracting State shall build an adequate liaison with the Contracting State that initially issued the maintenance organization approval.	Example: The Agreement between the United States of America and the European Union on Cooperation in the Regulation of Civil Aviation Safety and its Annexes. 4.1. Subject to the terms of this Annex, the Parties agree that their Technical Agents shall accept inspections and monitoring of repair stations/maintenance organizations made by the other technical agent or where applicable Aviation Authorities, for findings of compliance with their respective requirements as the basis for issuance and continued validity of certificates.	REGULATION (EU) 2018/1139 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 4 July 2018 (EASA BASIC REGULATION) ... Article 68 Acceptance of third-country certification 1.The Agency and the national competent authorities may either issue the certificates provided for in this Regulation, and in the delegated and implementing acts adopted on the basis thereof, on the basis of certificates issued in accordance with the laws of a third country, or accept certificates and other relevant documentation attesting compliance with civil aviation rules which were issued in accordance with the laws of a third country, where such possibility is provided for in: (a) international agreements concerning the recognition of certificates concluded between the Union and a third country; (b) the delegated acts adopted on the basis of paragraph 3; or (c) in the absence of an international agreement and of a relevant delegated act as referred to in points (a) and (b) of this paragraph respectively, and without prejudice to Article 140(6) of this Regulation, an agreement concerning the recognition of certificates concluded between a Member	Information on this requirement could not be evidenced in the LAR 145 regulation, however there are examples of multinational OMAS acceptance frameworks. In this agreement there are at least: Uruguay, Venezuela, Guatemala, Peru, Cuba, Argentina, in the periods 2011-2014. Note: This information could be updated and will be used for reference only.	Information not found or missing	1-Are them equivalent? The Area Experts agree the regulations are not equivalent. 2-Are them different? If so, please Explain. -The MRAC and the LARs does not include provisions for the compliance with 6.2.6 of Annex 8 chapter 6 3-Additional information - Regulations shows different methodologies of compliance to the ICAO SARPs, including but not limited to charts and attachments -In LARs, regarding AMO amendment, the required information to be reported to the compentent authority includes the aspects to be documented and/or reported to CAA before changes are approved.

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	MRAC/BCAR	Remarks
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				<p>State and a third country before the entry into force of Regulation (EC) No 1592/2002 that has been notified to the Commission and the other Member States in accordance with point (a) of Article 9(2) of Regulation (EC) No 1592/2002 or point (a) of Article 12(2) of Regulation (EC) No 216/2008. Within European Union the 'mutual recognition' is the rule.</p> <p>NOTE on bilateral agreements: The European Commission (and not EASA) negotiates on behalf of the European Community an Agreement on civil aviation safety with diferent States on the field of maintenance.</p>			

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6.3	6.3.1	6.5.1.1			-	
		6.2.1.5 APPLICATION FOR AN AMO CERTIFICATE AND/OR RATINGS (a) An application for an AMO certificate shall be made on a form and in a manner as prescribed by IS 6.2.1.5 and shall include: (1) The organisation’s AMO Procedures Manual in duplicate; 6.5 AMO OPERATING RULES 6.5.1.1 AMO PROCEDURES MANUAL Note 1: The definition of AMO Procedures Manual is the same as “maintenance organisation’s procedures manual” as defined in Part 1 of these regulations. Note 2: The purpose of the AMO Procedures Manual is to set forth the guidance, instructions, and procedures of the AMO. Compliance with the contents of the manual will assure compliance with the requirements of this part, which is a prerequisite to obtaining and retaining an AMO certificate. (a) Each AMO shall have an AMO Procedures Manual, which may be issued in separate parts. The manual shall be amended as necessary to keep the information contained therein up-to-date.	145.A.70(a) (a) ‘Maintenance organisation exposition’ means the document or documents that contain the material specifying the scope of work deemed to constitute approval and showing how the organisation intends to comply with this Annex (Part-145). The organisation shall provide the competent authority with a maintenance organisation exposition, containing the following information:	145.345 Maintenance Organization Manual (MOM) (a) The OMA LAR 145 must develop and keep updated a MOM, for use and guidance of the organization's personnel, which may be presented in separate documents or in separate electronic files, provided that the administrative part of the manual contains a clear cross-reference to these documents or electronic files and that its content includes at least what is indicated in Appendix 1.	BCAR 145.70 Maintenance Organization Expositions (MOE) A maintenance organization exposition under this Regulation shall contain details of the following subjects as set out in the Approved Maintenance Organisation Standards:+G10	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. -NIL 3-Additional information
		a) a general description of the scope of work authorized under the organization’s terms of approval; 6.5 AMO OPERATING RULES 6.5.1.1 AMO PROCEDURES MANUAL (b) The AMO Procedures Manual shall: (1) Provide clear guidance to personnel on how the functions are to be performed under the approval issued by the Authority; (2) Explain how personnel are managed and describe their duties and responsibilities and how compliance with the relevant continuing airworthiness requirements is achieved; 6.2.1.5 APPLICATION FOR AN AMO CERTIFICATE AND/OR RATINGS (a) An application for an AMO certificate shall be made on a form and in a manner as prescribed by IS 6.2.1.5 and shall include: (2) A list of the maintenance functions to be performed for the organisation, under	145.A.70(a)(9) , more info in AMC 145.A.70(a) Maintenance organisation exposition The following information should be included in the maintenance organisation exposition: PART 1 MANAGEMENT 1.9 Organisations intended scope of work	145.110 Certificado y alcance de la aprobación (a) La aprobación de una OMA está indicada en el certificado de aprobación que otorga la AAC. (b) Ninguna persona debe operar una OMA sin el certificado de aprobación o infringiendo dicho certificado y sus alcances. (c) La lista de capacidades debe establecer el alcance y limitación de los trabajos que cubre la aprobación a través del certificado.	BCAR 145.70 Maintenance Organization Expositions (MOE) (PDF 29) d) A maintenance organization exposition under this Regulation shall contain details of thefollowing subjects as set out in the Approved Maintenance Organisation Standards: 4);the specific scope of work required by the approved maintenance organisation in order to satisfy the relevant requirements needed for obtaining an approval to issue certificate of release to service in respect of maintenance of Belizean aircraft and their associated aircraft components;	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. -NIL 3-Additional information NIL

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
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		contract, by another person or organisation; Note 1: “On a form and in a manner” means that a form issued by the Authority shall be completed by the accountable manager, or the manager’s designated nominee in accordance with paragraph 6.2.1.5(a) of this part.				
	b) a description of the organization’s procedures and quality or inspection system in accordance with 6.4;	1.2 A description of the organisation’s procedures and quality assurance programme or inspection system in accordance with 6.5.1.2 of this part. 6.5.1.2 MAINTENANCE PROCEDURES AND THE QUALITY ASSURANCE PROGRAMME (a) An AMO shall establish procedures, acceptable to the Authority, that ensure safe maintenance practices and compliance with all relevant requirements of this part. (b) An AMO shall ensure compliance with paragraph 6.5.1.2(a) of this subsection by either: (1) Establishing an independent quality assurance programme to monitor compliance with and the adequacy of the procedures; or (2) Providing a system of inspection to ensure that all maintenance is properly performed. (c) The independent quality assurance programme of an AMO shall include the audit procedures contained in the AMO Procedures Manual and prescribed in paragraph 4.1.4 of IS 6.5.1.1.	145.A.70(A)(12) and more info in AMC 145.A.70(a) Maintenance organisation exposition The following information should be included in the maintenance organisation exposition: PART 2 MAINTENANCE PROCEDURES 2.23 Critical maintenance tasks and error-capturing methods PART 3 QUALITY SYSTEM PROCEDURES 3.1 Quality audit of organisation procedures 3.2 Quality audit of aircraft 3.3 Quality audit remedial action procedure	Appendix 1 Maintenance Organization Manual Part 1 1.2 A description of the organization's procedures and inspection systems or quality systems and that takes into consideration operational safety management; 1.4 The safety and quality policy and objectives, and the procedures for their periodic review to ensure their applicability in the OMA; Part 2 Maintenance, inspection and quality system procedures (Section 145.340) 2.1 A description of the maintenance, inspection and quality system procedures required by Section 145.340 of this regulation, which shall consider:	BCAR 145.65 Safety and Quality Policy, Maintenance Procedures and Quality System (See BCAR 145.65) a) The BCAR -145 AMO shall establish a safety and quality policy for the organization to be included in the MOE under BCAR -145.70. b) The BCAR - 145 AMO shall establish procedures acceptable to the BDCA, taking into account human factors and human performance to ensure good maintenance practices and compliance with the requirements of this BCAR - 145 including a clear work order or contract such that aircraft and components may be released to service in accordance with BCAR -145.50.	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. -NIL 3-Additional information NIL
	c) a general description of the organization’s facilities;	IS 6.5.1.1 AMO PROCEDURES MANUAL (a) The AMO Procedures Manual shall contain the following content: 1.0 General 1.3 A general description of the organisation’s facilities.	145.A.70(a)(8) and more info in AMC 145.A.70(a) Maintenance organisation exposition PART 1 MANAGEMENT 1.8 General description of the facilities at each address intended to be approved	Appendix 1 Maintenance Organization Manual Part 1 1.10 A general description of the facilities located at each address specified in the OMA LAR 145 certificate of approval;	BCAR 145.70 Maintenance Organization Expositions (MOE) (See AMC IEM 145.70) d) A maintenance organization exposition under this Regulation shall contain details of the following subjects as set out in the Approved Maintenance Organisation Standards: 14) a general description of the facilities located at each address specified in the approved maintenance organisation certificate;	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. -NIL 3-Additional information NIL

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
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		d) names and duties of the person or persons required by 6.6.1 and 6.6.2;	IS 6.5.1.1 AMO PROCEDURES MANUAL (a) The AMO Procedures Manual shall contain the following content: 1.0 General 1.4 The names, tasks, duties, and responsibilities of the person or persons required to ensure the maintenance organisation is in compliance with the regulations of [STATE].	145.A.70(a)(3)&(4) and more info in AMC 145.A.70(a) Maintenance organisation exposition The following information should be included in the maintenance organisation exposition: PART 1 MANAGEMENT 1.1 Corporate commitment by the accountable manager 1.2 Safety and quality policy 1.3 Management personnel 1.4 Duties and responsibilities of the management personnel 1.5 Management organisation chart 145.A.30 Personnel requirements (a) The organisation shall appoint an accountable manager who has corporate authority for ensuring that all maintenance required by the customer can be financed and carried out to the standard required by this Part. The accountable manager shall: 1. ensure that all necessary resources are available to accomplish maintenance in accordance with point 145.A.65(b) to support the organisation approval. 2. establish and promote the safety and quality policy specified in point 145.A.65(a). 3. demonstrate a basic understanding of this Annex (Part-145). (b) The organisation shall nominate a person or group of persons, whose responsibilities include ensuring that the organisation complies with this Part. Such person(s) shall ultimately be responsible to the accountable manager. 1. The person or persons nominated shall represent the maintenance management structure of the organisation and be responsible for all functions specified in this Part. 2. The person or persons nominated shall be identified and their credentials submitted in a form and manner established by the competent authority. 3. The person or persons nominated shall be able to demonstrate relevant knowledge, background and satisfactory experience related to aircraft or component maintenance and demonstrate a working knowledge of this Part. 4. Procedures shall make clear who deputises for any particular person in the case of lengthy absence of the said person. (c) The accountable manager under point (a) shall appoint a person with responsibility for monitoring the quality system, including the associated feedback system as required by point 145.A.65(c). The appointed person shall have direct access to the accountable manager to ensure that the accountable manager is kept properly informed on quality and compliance matters.	Appendix 1 Maintenance Organization Manual Part 1 1.5 The position names and names of the organization’s key personnel; 1.6 The names of the certifying persons; 1.7 The duties and responsibilities of persons in management positions and certification personnel, including matters they may deal directly with the CAA on behalf of OMA LAR 145; 1.8 An organizational chart showing the lines of responsibility of key personnel in the organization;	BCAR 145.70 Maintenance Organization Expositions (MOE) (See AMC IEM 145.70) d) A maintenance organization exposition under this Regulation shall contain details of thefollowing subjects as set out in the Approved Maintenance Organisation Standards: 3) the titles and names of the management personnel approved by the Director which may be kept separate from the maintenance organization exposition but shall be kept current and available for review by the Director when requested; 4) the duties and responsibility of the management personnel and the matters on which they may deal directly with the Director on behalf of the approved maintenance organisation	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. -NIL 3-Additional information NIL

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	e) a description of the procedures used to establish the competence of the maintenance personnel required by 6.6.4;	IS 6.5.1.1 AMO PROCEDURES MANUAL (a) The AMO Procedures Manual shall contain the following content: 1.0 General 1.5 A description of the procedures used to establish the competence of maintenance personnel as required by 6.5.1.2 and 6.4.1.3 of this part.	AMC 145.A.70(a) Maintenance organisation exposition The following information should be included in the maintenance organisation exposition: PART 3 QUALITY SYSTEM PROCEDURES 3.4 Certifying staff and support staff qualification and training procedures 3.5 Certifying staff and support staff records 3.6 Quality audit personnel 3.7 Qualifying inspectors 3.8 Qualifying mechanics 3.14 Competence assessment of personnel	Part 2 Maintenance, inspection and quality system procedures (Section 145.340) 2.2 The procedures used to establish and control the competence of the organization's personnel in accordance with the organization's scope;	BCAR 145.70 Maintenance Organization Expositions (MOE) (PDF 29) d) A maintenance organization exposition under this Regulation shall contain details of the following subjects as set out in the Approved Maintenance Organisation Standards: 6) a description of the procedures used to establish the competence of maintenance personnel;	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. -NIL 3-Additional information NIL
	f) a description of the method used for the completion and retention of the maintenance records required by 6.7;	IS 6.5.1.1 AMO PROCEDURES MANUAL (a) The AMO Procedures Manual shall contain the following content: 1.0 General 1.1 A description of the method used for the completion and retention of the maintenance records required by 6.5.1.8 of this part. 1.1.1 The records shall show that all requirements for the signing of an approval for return to service have been met. 1.1.2 The records shall be kept for a minimum period of 1 year after the signing of an approval for return to service.	AMC 145.A.70(a) Maintenance organisation exposition The following information should be included in the maintenance organisation exposition: ... PART 2 MAINTENANCE PROCEDURES 2.13 Maintenance documentation in use and its completion 2.14 Technical record control 2.17 Records for the operator 2.29 Airworthiness review procedures and records 2.21 Control of computer maintenance record systems PART 4 ... 4.3 Operator record completion	Part 2 Maintenance, inspection and quality system procedures (Section 145.340) 2.5 A description of the method employed to complete and retain the maintenance records required in Section 145.335 of these regulations; 2.6 computerized maintenance records control system and methods used for data backup;	BCAR 145.70 Maintenance Organization Expositions (MOE) (PDF 29) d) A maintenance organization exposition under this Regulation shall contain details of the following subjects as set out in the Approved Maintenance Organisation Standards: 9) a description of the method used for the completion and retention of maintenance records;	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. -NIL 3-Additional information - EASA and LARs has a computerized maintenance records control system as additional requirement not outlined in the ICAO SARPs.

ICAO Reference		FAA (MCRs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
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	g) a description of the procedures for preparing the maintenance release and the circumstances under which the release is to be signed;	IS 6.5.1.1 AMO PROCEDURES MANUAL (a) The AMO Procedures Manual shall contain the following content: 1.0 General 1.7 A description of the procedure for preparing the approval for return to service and the circumstances under which it is to be signed.	AMC 145.A.70(a) Maintenance organisation exposition The following information should be included in the maintenance organisation exposition: PART 2 MAINTENANCE PROCEDURES 2.16 Release to service procedure	Part 2 Maintenance, inspection and quality system procedures (Section 145.340) 2.4 procedures for preparing the maintenance conformity certification and the circumstances under which it is to be signed as required by Section 145.330 of these regulations;	BCAR 145.70 Maintenance Organization Expositions (MOE) (PDF 29) d) A maintenance organization exposition under this Regulation shall contain details of the following subjects as set out in the Approved Maintenance Organisation Standards: 10) a description of the procedures for preparing the certificate of release to service and the circumstances under which it is to be signed;	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. 3-Additional information - The taxonomy in the regulations compared are different, nonetheless the aim is in compliance with ICAO SARPs. -The operator based in their complexity might add additional requirements and/or variations additional to the ICAO requirements. -It is important to take into account the certification basis of the aircraft (the acceptance of the type certificate applicable to the aircraft) accepted or issued by the country of registration, especially when preparing the maintenance release.
	h) the personnel authorized to sign the maintenance release and the scope of their authorization;	IS 6.5.1.1 AMO PROCEDURES MANUAL (a) The AMO Procedures Manual shall contain the following content: 1.0 General 1.8 The names of personnel authorised to sign the approval for return to service and the scope of their authorisation. The person signing the approval for return to service shall be qualified in accordance with Part 2 of these regulations.	145.A.70(a) Maintenance organisation exposition 6. a list of certifying staff, support staff and, if applicable, airworthiness review staff, with their scope of approval. AMC 145.A.70(a) Maintenance organisation exposition The following information should be included in the maintenance organisation exposition: PART 1 MANAGEMENT 1.6 List of certifying staff, support staff and airworthiness review staff 1.9 Organisations intended scope of work PART 3 QUALITY SYSTEM PROCEDURES 3.4 Certifying staff and support staff qualification and training procedures 3.5 Certifying staff and support staff records	Part 2 Maintenance, inspection and quality system procedures (Section 145.340) 2.8 procedure for approving personnel authorized to sign the maintenance conformity certification and the scope of such authorizations;	BCAR 145.70 Maintenance Organization Expositions (MOE) (PDF 29) d) A maintenance organization exposition under this Regulation shall contain details of the following subjects as set out in the Approved Maintenance Organisation Standards: 5) a current list of certifying staff which may be keep separate from the maintenance organization exposition but the list and the procedures to establish and maintain such list shall be available for review by the Director;	1-Are them equivalent? The Area Experts agree the regulations are equivalent, with the exception of EASA, 2-Are them different? If so, please Explain. EASA did not stablsh the scope of work for the certifying staff. 3-Additional information NIL

ICAO Reference		FAA (MCRs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
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	i) a description, when applicable, of contracted activities;	<p>IS 6.5.1.1</p> <p>3.0 Maintenance Procedures</p> <p>3.2 Acceptance/inspection of aeronautical products, including materials from outside contractors. 3.21 Control of defective aeronautical products sent to outside contractors for overhaul, etc. 3.24 Contract/subcontract procedures</p> <p>3.29.1 Incoming inspections. A system or method for the inspection of incoming aeronautical products and/or materials, including the inspection of:</p> <p>(c) Items sent out for contracted maintenance functions for: (1) Shipping damage; and (2) Conformity to the Authority's and the manufacturer's specifications, including material type and state of preservation.</p>	<p>AMC 145.A.70(a) Maintenance organisation exposition</p> <p>The following information should be included in the maintenance organisation exposition:</p> <p>PART 2 MAINTENANCE PROCEDURES</p> <p>2.1 Supplier evaluation and subcontract control procedure</p> <p>PART 5</p> <p>5.2 List of Subcontractors as per 145.A.75(b)</p> <p>5.4 List of contracted organisations as per 145.A.70(a)(16)</p>	<p>Part 2 Maintenance, inspection and quality system procedures (Section 145.340)</p> <p>2.10 procedure for the issuance of maintenance conformity when work is subcontracted;</p>	<p>BCAR 145.70 Maintenance Organization Expositions (MOE) (PDF 29)</p> <p>d) A maintenance organization exposition under this Regulation shall contain details of the following subjects as set out in the Approved Maintenance Organisation Standards: 23)a list of organisations performing maintenance on behalf of the approved maintenance organisation; and</p>	Pending

ICAO Reference		FAA (MCRs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section	Details					
	j) a description, when applicable, of the additional procedures for complying with an operator’s maintenance procedures and requirements;	<p>6.5 AMO OPERATING RULES</p> <p>6.5.1.1 AMO PROCEDURES MANUAL</p> <p>(g) Detailed requirements pertaining to the AMO Procedures Manual are prescribed in IS 6.5.1.1.</p>	<p>AMC 145.A.70(a) Maintenance organisation exposition</p> <p>The following information should be included in the maintenance organisation exposition:</p> <p>...</p> <p>PART 2 MAINTENANCE PROCEDURES</p> <p>2.15 Rectification of defects arising during base maintenance</p> <p>2.16 Release to service procedure</p> <p>2.17 Records for the operator</p> <p>2.18 Reporting of defects to the competent authority/operator/manufacture</p> <p>2.29 Airworthiness review procedures and records</p> <p>PART L2 ADDITIONAL LINE MAINTENANCE PROCEDURES</p> <p>L2.3 Line maintenance control of defects and repetitive defects</p> <p>L2.4 Line procedure for completion of technical log</p> <p>PART 4</p> <p>4.1 Contracting operators</p> <p>4.2 Operator procedures and paperwork</p> <p>4.3 Operator record completion</p>	<p>Part 3 Additional maintenance procedures by location (when applicable)</p> <p>3.1 Procedure for the control of components, tools, equipment, materials, etc. for line maintenance;</p> <p>3.2 Line maintenance procedures for servicing, fueling, de-icing, etc. of aircraft;</p> <p>3.3 Procedure for line maintenance control of faults and repetitive faults;</p> <p>3.4 Line procedure for completing the aircraft technical flight log and issuing the respective maintenance conformity, as applicable;</p> <p>3.5 Procedure for the return of defective parts removed from the aircraft; and</p> <p>3.6 Procedure to maintain updated information on the installed capacity for the execution of maintenance in the additional maintenance bases.</p>	<p>BCAR 145.70 Maintenance Organization Expositions (MOE)</p> <p>(See AMC IEM 145.70)</p> <p>d) A maintenance organization exposition under this Regulation shall contain details of the following subjects as set out in the Approved Maintenance Organisation Standards:</p> <p>11) a description, where applicable, of additional procedures for complying with maintenance procedures and requirements of the national air operator;</p> <p>8. The MOE should cover four (4) main parts:</p> <p>8.1. Management</p> <p>8.2. The maintenance procedures covering all aspects of how aircraft components may be accepted from outside sources and how the aircraft would be maintained to achieve the required standard.</p> <p>8.3. The quality system procedures including the methods of qualifying mechanics, inspection, certifying staff, and quality audit personnel.</p> <p>8.4. Contracted operator procedure and paperwork.</p>	<p>1-Are they equivalent?</p> <p>The Area Experts agree: The regulations are equivalent.</p> <p>2-Are they different? If so, please Explain.</p> <p>It can be evidenced that there are several compliance methods with additional aids and guidelines to what is defined in the regulation, for those cases the differences have been established, as in the case of EASA (AMCs), however it is not found in the regulation, if it offers a compliance method acceptable.</p> <p>3- Additional information</p> <p>Curacao: Air carrier must teach the AMO (145) on his approved procedures.</p> <p>Nicaragua: I agree with the FAA representative's approach, the procedures must be specific to the OMA and only take references from the operator's procedures in generic terms.</p> <p>FAA: it is important to understand that AMO are commonly considered as an extended area of the air carrier, including air carrier procedures in the AMO manual is something that must be developed very carefully, if applicable. But the best option is not to include Air carriers procedures to the AMO Procedures manuals.</p>

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section	Details					
	<p>k) a description of the procedures for complying with the information reporting requirements of 4.2.3.1 f) and 4.2.4 of this part;</p>	<p>6.5.1.10 REPORTING OF UNAIRWORTHY CONDITIONS (a) The AMO shall report to the Authority and the aircraft design organisation of the State of Design any identified fault, malfunction, defect, or other occurrence that could present a serious hazard to the aircraft. (b) Reports shall be made in a form and manner prescribed by the Authority and shall contain all information about the condition known to the AMO. Each report shall contain at least the following items: (1) The aircraft registration number; (2) The type, make, and model of the aeronautical product; (3) The date of the discovery of the fault, malfunction, defect, or other occurrence; (4) The time elapsed since the last overhaul, if applicable; (5) The nature of the fault, malfunction, defect, or other occurrence; (6) The apparent cause of the fault, malfunction, defect, or other occurrence; and (7) Other pertinent information that is necessary for more complete identification, determination of seriousness, or corrective action. (c) Where the AMO is contracted by an AOC holder to carry out maintenance functions, that AMO shall report to the AOC holder any fault, malfunction, defect, or other occurrence affecting the continuing airworthiness of the aircraft or other aeronautical product. (d) Reports shall be made as soon as practicable, but in any case within 3 days of the AMO identifying the fault, malfunction, defect, or other occurrence to which the report relates. Note: ICAO and FAA use the term “service difficulty reporting.” EASA uses the term “occurrence reporting.”</p>	<p>AMC 145.A.70(a) Maintenance organisation exposition The following information should be included in the maintenance organisation exposition: ... PART 2 MAINTENANCE PROCEDURES 2.18 Reporting of defects to the competent authority/operator/manufacturer</p> <p>145.A.60 Occurrence reporting (a) The organisation shall report to the competent authority, the state of registry and the organisation responsible for the design of the aircraft or component any condition of the aircraft or component identified by the organisation that has resulted or may result in an unsafe condition that hazards seriously the flight safety. (b) The organisation shall establish an internal occurrence reporting system as detailed in the exposition to enable the collection and evaluation of such reports, including the assessment and extraction of those occurrences to be reported under point (a). This procedure shall identify adverse trends, corrective actions taken or to be taken by the organisation to address deficiencies and include evaluation of all known relevant information relating to such occurrences and a method to circulate the information as necessary. (c) The organisation shall make such reports in a form and manner established by the Agency and ensure that they contain all pertinent information about the condition and evaluation results known to the organisation. (d) Where the organisation is contracted by a commercial operator to carry out maintenance, the organisation shall also report to the operator any such condition affecting the operator's aircraft or component. (e) The organisation shall produce and submit such reports as soon as practicable but in any case within 72 hours of the organisation identifying the condition to which the report relates.</p>	<p>Part 2 Maintenance, inspection and quality system procedures (Section 145.340) 2.11 procedures to ensure that with respect to aircraft and/or aircraft components, failures, malfunctions, faults and other occurrences that have or could have an adverse effect on continued airworthiness are reported to the aircraft operator, the organization responsible for the type design of that aircraft and the State of Registry CAA;</p>	<p>BCAR 145.60 Occurrence Reporting (PDF 27) a) An approved maintenance organisation shall report to the Director and the aircraft design organisation of the State of Design any identified condition that could present a serious hazard to the aircraft component. b) The approved maintenance organization shall establish an internal occurrence reporting system as detailed in the MOE to enable the collection and evaluation of such reports, including the assessment and extraction of those occurrences to be reported under paragraph (a). The procedure shall identify adverse trends, corrective actions taken or to be taken by the AMO to address deficiencies and include evaluation of all known relevant information relating to such occurrences and a method to circulate the necessary information. c) All reports referred to in paragraph (a), shall be made in a form and manner prescribed by the Director and contain all pertinent information about the condition known to the approved maintenance organisation. d) Where the approved maintenance organisation is contracted by an air operator to carry out maintenance, the approved maintenance organisation shall report to the air operator any condition affecting the aircraft component. e) Reports required by this Regulation shall be made as soon as reasonably practicable, but no later than 72 hours after the condition to which the report relates has been identified</p>	<p>1-Are them equivalent? In the case of the ICAO requirement under section K 4.2.3.1 f) all the regulations compared are equivalent in compliance. 2-Are them different? If so, please Explain. In the case of the ICAO requirement under section K 4.2.4, the regulations on EASA, LAR, BCAR and MRAC are not in compliance with the ICAO SARPs. EASA regulation has several compliance methods with additional aids and guidelines to comply with the ICAO SARP. However it is not found in the regulation, but in EASA AMCs.</p> <p>3- Additional information Time limitations for the requirements outlined in FAA, EASA and BCAR are to be considered in addition to the ICAO requirements to report this occurrences to the state responsible for design.</p>
	<p>4.2.3.1 The State of Registry shall: f) ensure that, in respect of aeroplanes over 5 700 kg and helicopters over 3 175 kg maximum certificated take-off mass, there exists a system whereby information on faults, malfunctions, defects and other occurrences that cause or might cause adverse effects on the continuing airworthiness of the aircraft is transmitted to the organization responsible for the type design of that aircraft. Whenever this information relates to an engine or propeller, such information shall be transmitted to both the organization responsible for engine or propeller type design and the organization responsible for aircraft type design. Where a continuing airworthiness safety issue is associated with a modification, the State of Registry shall ensure that there exists a system whereby the above information is transmitted to the organization responsible for the design of the modification.</p>					

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section	Details					
	<p>4.2.4 All Contracting States Each Contracting State shall establish, in respect of aeroplanes over 5 700 kg and helicopters over 3 175 kg maximum certificated take-off mass, the type of information that is to be reported to its airworthiness authority by operators, organizations responsible for type design and maintenance organizations. Procedures for reporting this information shall also be established.</p>					
	<p>l) a description of the procedure for receiving, assessing, amending and distributing within the maintenance organization all necessary airworthiness data from the organization responsible for the type design; and</p>	<p>IS 6.5.1.1 General 1.11 A description of the procedure for receiving, assessing, amending, and distributing within the maintenance organisation all necessary airworthiness data from the TC holder or type design organisation. IS 6.5.1.9 AIRWORTHINESS DATA – INSTRUCTIONS FOR CONTINUING AIRWORTHINESS (a) The AMO shall be in receipt of all airworthiness data appropriate to support the work performed from the Authority, the aircraft or aeronautical product design organisation, and any other approved design organisation in the State of Manufacture or State of Design, as appropriate.</p>	<p>145.A.45 Maintenance data ... (c) The organisation shall establish procedures to ensure that if found, any inaccurate, incomplete or ambiguous procedure, practice, information or maintenance instruction contained in the maintenance data used by maintenance personnel is recorded and notified to the author of the maintenance data. ... (f) The organisation shall ensure that all applicable maintenance data is readily available for use when required by maintenance personnel. (g) The organisation shall establish a procedure to ensure that maintenance data it controls is kept up to date. In the case of operator/customer controlled and provided maintenance data, the organisation shall be able to show that either it has written confirmation from the operator/customer that all such maintenance data is up to date or it has work orders specifying the amendment status of the maintenance data to be used or it can show that it is on the operator/customer maintenance data amendment list. AMC 145.A.70(a) Maintenance organisation exposition The following information should be included in the maintenance organisation exposition: ... PART 2 MAINTENANCE PROCEDURES 2.8 Maintenance instructions and relationship to</p>	<p>Part 2 Maintenance, inspection and quality system procedures (Section 145.340) 2.12 procedures for receiving, evaluating, amending and distributing all necessary airworthiness data within the maintenance organization issued by the type certificate holder or type design organization;</p>	<p>BCAR 145.70 Maintenance Organization Expositions (MOE) (PDF 29) d) A maintenance organization exposition under this Regulation shall contain details of thefollowing subjects as set out in the Approved Maintenance Organisation Standards: 13) a procedure for receiving, amending and distributing, within the approved maintenance organisation, all necessary airworthiness data from the type certificate holder or the type design organisation;</p>	<p>1-Are them equivalent? The regulations are equivalent, however EASA uses a different wording to comply with the ICAO SARPs. 2-Are them different? If so, please Explain. NIL 3- Additional information NIL</p>

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section	Details					
			aircraft/aircraft component manufacturers' instructions including updating and availability to staff 2.11 Airworthiness directives procedure 2.12 Optional modification procedure 2.13 Maintenance documentation in use and its completion			

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section	Details					
6.3.2	m) a description of the procedures for implementing changes affecting the approval of the maintenance organization.	6.5 AMO OPERATING RULES 6.5.1.1 AMO PROCEDURES MANUAL (d) The AMO Procedures Manual and any subsequent amendments to the manual shall be approved by the Authority prior to use. (e) An AMO shall promptly furnish copies of all amendments to the AMO Procedures Manual to all organisations or persons to whom the manual has been issued.	145.A.70 Maintenance organisation exposition (Regulation (EU) 2020/270) (PDF 401) (a) ‘Maintenance organisation exposition’ means the document or documents that contain the material specifying the scope of work deemed to constitute approval and showing how the organisation intends to comply with this Annex (Part-145). The organisation shall provide the competent authority with a maintenance organisation exposition, containing the following information: 11. the maintenance organisation exposition amendment procedure;	Appendix 1 Maintenance Organization Manual Part 1 Administration 1.11 Procedure for making minor modifications to the MOM; 1.12 Procedure for amendments and control of effective pages to the SMS and Maintenance Organization Manual (MSMS), revision log and list of manual distributions; 1.13 Procedures for amendments to the manual(s) to be distributed throughout the organization or to those to whom a copy has been previously provided; 1.14 Procedure for notifying the CAA approved by the OMA regarding changes in the organization, its activities, approvals, location and personnel; 1.15 A description of the procedures for implementing changes affecting maintenance entity approval;	BCAR 145.85 Changes to the BCAR – 145 AMO (PDF 33) a) Where the holder of an approved maintenance organisation certificate wishes to make changes to his certificate in relation to 1) the name of the organisation; 2) the location of the organisation; 3) the housing, facilities, equipment, tools, material, procedures, work scope and certifying staff that could affect the approved maintenance organisation rating; 4) the ratings held by the approved maintenance organisation, whether granted by the Director or held through an approved maintenance organisation certificate issued by another Contracting State; 5) additional locations of the organisation; 6) the Accountable Manager; and 7) the list of management personnel identified in the MOE, he shall provide written notification to the Director of his intention to make such change at least 7 days before the submission of the application for the amendment.	1-Are them equivalent? The regulations are equivalent, except by the BCAR/MRAC. 2-Are them different? If so, please Explain. The BCAR/MARC Does not require a procedure to comply with this ICAO SARPs. 3- Additional Information
	The maintenance organization shall ensure that the procedures manual is amended as necessary to keep the information contained therein up to date.	6.5.1.1 AMO PROCEDURES MANUAL (a) Each AMO shall have an AMO Procedures Manual, which may be issued in separate parts. The manual shall be amended as necessary to keep the information contained therein up-to-date. 6.2.1.11 CHANGES TO THE AMO AND AMO CERTIFICATE AMENDMENTS (b) To enable the Authority to determine continued compliance with this part, the AMO shall provide written notification to the Authority prior to, or within a time period determined by the Authority to be as soon as practicable after, changes to any of the following: (6) The AMO Procedures Manual;	M.A.604 Maintenance organisation manual (Regulation (EU) 2020/270) (PDF 89) (a) The maintenance organisation shall provide a manual containing at least the following information: 8. the maintenance organisation manual amendment procedure(s). Appendix IV to AMC M.A.604 — Maintenance organisation manual 5. Distribution The manual describes how the organisation works therefore the manual or relevant parts thereof need to be distributed to all concerned staff in the organisation and contracted organisations.	145.345 Maintenance Organization Manual (MOM) (a) The OMA LAR 145 must develop and keep updated a MOM, for use and guidance of the organization's personnel, which may be presented in separate documents or in separate electronic files, provided that the administrative part of the manual contains a clear cross-reference to these documents or electronic files and that its content includes at least what is indicated in Appendix 1. Appendix 1 Maintenance Organization Manual Part 1 Administration 1.15 A description of the procedures for implementing changes affecting maintenance entity approval; 1.16 An updated list of outsourced maintenance functions under the OMA LAR 145 quality and inspection system, if applicable; 1.17 An updated list of maintenance locations, if applicable; 1.18 An updated list of maintenance functions that maintenance organizations outsource to LAR 145 approved maintenance organizations, if applicable.	BCAR 145.70 Maintenance Organization Expositions (MOE) (PDF 29) d) A maintenance organization exposition under this Regulation shall contain details of thefollowing subjects as set out in the Approved Maintenance Organisation Standards: 16) the notification procedure to be used by the approved maintenance organisation when requesting approval by the Director for changes to the approved maintenance organisation; 17) procedures to be adopted by the approved maintenance organisation when making amendments to the maintenance organization exposition, including submissions to the Director; h) The approved maintenance organisation shall ensure that all amendments to its maintenance organization exposition, which are necessary to keep the information contained therein current , are submitted to the Director for approval	1-Are them equivalent? The regulations are equivalent, except for EASA that does not clearly stablish the risponsibility of the AMO of updating the procedures manuals. 2-Are them different? If so, please Explain. 3- Additional infomation. Curacao: See information in FAA (MCAR) 6.5.1.1 (a). This information is included.

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section	Details					
6.3.3	The maintenance organization shall furnish copies of all amendments to the procedures manual promptly to all organizations or persons to whom the manual has been issued.	6.5 AMO OPERATING RULES 6.5.1.1 AMO PROCEDURES MANUAL (e) An AMO shall promptly furnish copies of all amendments to the AMO Procedures Manual to all organisations or persons to whom the manual has been issued.		Appendix 1 Maintenance Organization Manual Part 1 Administration 1.12 Procedure for amendments and control of effective pages to the SMS and Maintenance Organization Manual (MSMS), revision log and list of manual distributions; 1.13 Procedures for amendments to the manual(s) to be distributed throughout the organization or to those to whom a copy has been previously provided	BCAR 145.70 Maintenance Organization Expositions (MOE) (PDF 29) c) The approved maintenance organisation shall ensure that the maintenance organization exposition referred to in paragraph (b), is provided for the use and guidance of the organisation and all maintenance personnel are familiar with those parts of the maintenance organization exposition that are relevant to the maintenance work they perform. i) An approved maintenance organisation shall ensure that all amendments to its approved maintenance organization exposition are provided promptly to all persons of the approved maintenance organisation to whom the manual has been issued.	1-Are them equivalent? The regulations are equivalent, except for EASA. that does not include it as regulation, but as an AMC. 2-Are them different? If so, please Explain. EASA has prepared an AMC to comply with the ICAO SARP. 3- Additional information. FAA: Can digital versions of manuals be an option for states? We have experience with some operators that decide to use digital manuals approved in its Ops Specs, but still is an air carrier option. Procedures in the FAA 8900, on guidance on how to implement digital manuals. Cuba: Each State must have options to comply with SARPs, but requirements to use digital versions as a must is not a good option. Saint Martin: Hard copies are still the best option. Some concerns still around with the use of digital copies, but some strategies might improve the utilization of digital information in the future

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Section	Details					
6.4.1	The maintenance organization shall establish procedures acceptable to the Contracting State granting the approval which ensure good maintenance practices and compliance with all relevant Standards prescribed in 6.2.1 and 6.2.2.	6.5.1.2 MAINTENANCE PROCEDURES AND THE QUALITY ASSURANCE PROGRAMME (a) An AMO shall establish procedures, acceptable to the Authority, that ensure safe maintenance practices and compliance with all relevant requirements of this part. (b) An AMO shall ensure compliance with paragraph 6.5.1.2(a) of this subsection by either: (1) Establishing an independent quality assurance programme to monitor compliance with and the adequacy of the procedures; or (2) Providing a system of inspection to ensure that all maintenance is properly performed. (c) The independent quality assurance programme of an AMO shall include the audit procedures contained in the AMO Procedures Manual and prescribed in paragraph 4.1.4 of IS 6.5.1.1.	145.A.65 Safety and quality policy, maintenance procedures and quality system (b) The organisation shall establish procedures agreed by the competent authority taking into account human factors and human performance to ensure good maintenance practices and compliance with the applicable requirements established in 145.A.25 to 145.A.95 . The procedures under this point shall: 1. ensure that a clear work order or contract has been agreed between the organisation and the organisation requesting maintenance to clearly establish the maintenance to be carried out so that aircraft and components may be released to service in accordance with 145.A.50 ; and, 2. cover all aspects of carrying out maintenance, including the provision and control of specialised services and lay down the standards to which the organisation intends to work.	145.340 Maintenance, inspection and quality systems (a) OMA LAR 145 must establish procedures in the MOM, acceptable to the CAA, to ensure good maintenance practices and airworthiness of aircraft and aircraft components when performing a maintenance service in accordance with its capabilities list.	BCAR 145.70 Maintenance Organization Expositions (MOE) d) A maintenance organization exposition under this Regulation shall contain details of the following subjects as set out in the Approved Maintenance Organisation Standards: 18) the procedures adopted by the approved maintenance organisation and approved by the Director, to ensure good maintenance practices and compliance with all relevant requirements of these Regulations;	1-Are them equivalent? The Area Experts agree the regulations are equivalent. except for EASA 2-Are them different? If so, please Explain. Compliance with Annex 19 is only established on AMC 3-Additional information AMC4 145.A.30(e) Personnel requirements (c) The purpose of recurrent safety training is primarily to ensure that staff remain current in terms of SMS principles and human factors and also to collect feedback on safety and human factors issues. Consideration should be given to involving compliance monitoring staff and the key safety management personnel in this training to provide a consistent presence and facilitate feedback. There should be a procedure to ensure that feedback is formally reported by the trainers through the internal safety reporting scheme to initiate action where necessary. Note: This information was taken from : Easy Access Rules for Continuing Airworthiness (Regulation (EU) No 1321/2014) version of Dec. 2022

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section	Details					
6.4.2	6.4.2 The maintenance organization shall ensure compliance with 6.4.1 by either establishing an independent quality assurance system to monitor compliance with, and adequacy of, the procedures, or by providing a system of inspection to ensure that all maintenance is properly performed.	6.2.1.14 QUALITY SYSTEM (a) An AMO shall establish a quality system that includes a quality assurance programme and shall designate a quality manager to monitor compliance with, and the adequacy of, procedures required to ensure safe maintenance practices and airworthy aircraft and aeronautical products. (b) The quality system and the quality manager shall be acceptable to the Authority. (c) The quality system shall include a procedure to initially qualify and periodically perform audits on persons performing work on behalf of the AMO. (d) The quality system shall include a feedback system to the designated management person or group of persons directly responsible for the quality system and ultimately to the accountable manager who ensures, as necessary, that proper and timely corrective action is taken in response to reports resulting from the independent audits. (e) The quality system shall be sufficient to review all maintenance procedures, as described in the AMO Procedures Manual and the operator’s MCM, in accordance with an approved quality assurance programme once every 12 month period. (f) The quality system shall indicate when audits are scheduled and when audits are completed and shall establish a system of audit reports that may be reviewed by the Authority on request. The audit system shall clearly establish a means by which audit reports containing observations about non-compliance or poor maintenance practices are communicated to the accountable manager. (g) If the AMO is a small organisation, the independent audit part of the quality system may be contracted to another organisation approved under this part or to a person with appropriate technical knowledge and proven satisfactory audit experience. (h) Where the AMO is part of an air operator certificated under Part 9 of these regulations, the operator’s quality system may be combined with the requirements of an AMO and submitted for acceptance to the Authority. (i) Each AMO shall describe its quality system in relevant documentation as prescribed in IS 6.2.1.14. Note: Where the AMO is part of an air operator certificated under Part 9 of these regulations, see IS 9.3.2.3 for examples of a combined quality system.	145.A.65 Safety and quality policy, maintenance procedures and quality system (Regulation (EU) 2015/1536) (PDF 393) (c) The organisation shall establish a quality system that includes the following: 1. Independent audits in order to monitor compliance with required aircraft/aircraft component standards and adequacy of the procedures to ensure that such procedures invoke good maintenance practices and airworthy aircraft/aircraft components. In the smallest organisations the independent audit part of the quality system may be contracted to another organisation approved under this Part or a person with appropriate technical knowledge and proven satisfactory audit experience; and 2. A quality feedback reporting system to the person or group of persons specified in point 145.A.30(b) and ultimately to the accountable manager that ensures proper and timely corrective action is taken in response to reports resulting from the independent audits established to meet point (1).	145.340 Maintenance, inspection and quality systems (d) The maintenance and inspection system must cover all maintenance activities, from the time the aircraft or aircraft component is received, until the maintenance conformity certification is issued. The elements considered in a maintenance and inspection system are the following: (1) Service control performed by non-approved OMs; (2) competence of the personnel performing in-process inspection and RII tasks; (3) update of the maintenance data to be used; (4) inspection system; (5) control over the calibration of tools and equipment including calibration intervals; and (6) forms to be used by the maintenance organization and how to fill them out. (h) OMAR LAR 145 must establish a quality and SMS system that includes independent audits to verify compliance with the required standards for the maintenance of aircraft and aircraft components, and to monitor that the procedures are adequate to ensure good maintenance practices and airworthiness of aircraft and aircraft components.	BCAR 145.65 Safety and Quality Policy, Maintenance Procedures and Quality System (See BCAR 145.65) a) The BCAR -145 AMO shall establish a safety and quality policy for the organization to be included in the MOE under BCAR -145.70. b) The BCAR - 145 AMO shall establish procedures acceptable to the BDCA, taking into account human factors and human performance to ensure good maintenance practices and compliance with the requirements of this BCAR - 145 including a clear work order or contract such that aircraft and components may be released to	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. NIL 3-Additional information NIL

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCARs / MRAC	Remarks	
Section	Details						
6.5	6.5.1	<p>The maintenance organization shall provide the appropriate facilities and working environments for the tasks to be performed.</p>	<p>6.3.1.2 HOUSING AND FACILITIES</p> <p>(a) Housing for the facilities, equipment, materials, and personnel shall be provided, appropriate for all planned work, ensuring, in particular, protection from weather.</p> <p>(b) All work environments shall be appropriate for the task performed and shall not impair the effectiveness of personnel.</p> <p>(c) Office accommodations shall be appropriate for the management of planned work, including, in particular, the management of quality, planning, and records.</p> <p>(d) Specialised workshops and bays shall be segregated, as appropriate, to ensure that environmental or work area contamination is unlikely to occur.</p> <p>(g) An AMO with an airframe rating shall provide suitable permanent housing to enclose the largest type and model of aircraft listed on its operations specifications.</p> <p>(h) An AMO may perform maintenance, overhaul, modification, repair, and inspection on aeronautical products outside of its housing if it provides suitable facilities that are acceptable to the Authority.</p>	<p>145.A.25 Facility requirements Regulation ((EU) No 1321/2014) (PDF 332)</p> <p>The organisation shall ensure that:</p> <p>(a) Facilities are provided appropriate for all planned work, ensuring in particular, protection from the weather elements. Specialised workshops and bays are segregated as appropriate, to ensure that environmental and work area contamination is unlikely to occur.</p> <p>1. For base maintenance of aircraft, aircraft hangars are both available and large enough to accommodate aircraft on planned base maintenance;</p> <p>2. For component maintenance, component workshops are large enough to accommodate the components on planned maintenance.</p> <p>(b) Office accommodation is provided for the management of the planned work referred to in point (a), and certifying staff so that they can carry out their designated tasks in a manner that contributes to good aircraft maintenance standards.</p> <p>(c) The working environment including aircraft hangars, component workshops and office accommodation is appropriate for the task carried out and in particular special requirements observed. Unless otherwise dictated by the particular task environment, the working environment must be such that the effectiveness of personnel is not impaired:</p> <p>1. temperatures must be maintained such that personnel can carry out required tasks without undue discomfort.</p> <p>2. dust and any other airborne contamination are kept to a minimum and not be permitted to reach a level in the work task area where visible aircraft/component surface contamination is evident. Where dust/other airborne contamination results in visible surface contamination, all susceptible systems are sealed until acceptable conditions are re-established.</p> <p>3. lighting is such as to ensure each inspection and maintenance task can be carried out in an effective manner.</p> <p>4. noise shall not distract personnel from carrying out inspection tasks. Where it is impractical to control the noise source, such personnel are provided with the necessary personal equipment to stop excessive noise causing distraction during inspection tasks.</p> <p>5. where a particular maintenance task requires the application of specific environmental conditions different to the foregoing, then such conditions are observed. Specific conditions are identified in the maintenance data.</p> <p>6. the working environment for line maintenance is such that the particular maintenance or inspection task can be carried out without undue distraction. Therefore where the working environment deteriorates to an unacceptable level in respect of temperature, moisture, hail, ice, snow, wind, light, dust/other airborne contamination, the particular maintenance or inspection tasks must be suspended until satisfactory conditions are re-established.</p>	<p>145.310 Facilities</p> <p>(a) OMA LAR 145 must provide appropriate facilities for all the work it plans to perform, specifically ensuring protection from environmental phenomena, dust and heat. Areas where specialized work is performed should be separated as necessary to ensure that contamination of the environment or work areas does not occur.</p> <p>(b) It shall provide appropriate office space for the proper administration of the work tasks planned in paragraph (a) of this section, including in particular, quality management and SMS, planning and technical records.</p> <p>(c) The work environment must be appropriate for the tasks to be performed and, in particular, meet special requirements that must be observed. Unless otherwise required by the particular environment of a task, the work environment should be such that the effectiveness of personnel is not impaired.</p>	<p>BCAR 145.25 Facility Requirements (PDF 18)</p> <p>a) This Part prescribes the requirements for housing, facilities, equipment and materials for issue of an approved maintenance organisation certificate.</p> <p>b) An approved maintenance organisation shall provide the necessary housing and facilities in the required quantity and quality that meet the standards required for the issuance of the certificate and ratings that the approved maintenance organisation holds</p> <p>c) An approved maintenance organisation shall provide the necessary housing and other facilities that would allow proper performance of all planned work and protection of personnel, plants and equipment, tools and materials from weather elements.</p> <p>d) An aircraft maintenance organisation shall ensure that</p> <p>1) the work environment is safe and appropriate to the tasks to be carried out, observing at all times special requirements applicable to particular task without impairing the effectiveness of personnel;</p> <p>2) the office accommodation is appropriate for the management of planned work including, in particular, the management of quality, planning, and technical records;</p> <p>3) specialized workshops and bays are segregated, as appropriate, to ensure that the environment and work area contamination is minimized;</p> <p>4) secure storage facilities are provided for parts, equipment, tools and material;</p> <p>5) storage conditions ensure segregation of serviceable aircraft components and material from unserviceable aircraft components, materials, equipment and tools;</p> <p>6) the storage conditions are in accordance with the instructions of the manufacturers, to prevent deterioration of and damage to stored items; and;</p> <p>7) access to storage facilities are restricted to authorised personnel</p>	<p>1-Are them equivalent? The Area Experts agree the regulations are equivalent. except for EASA</p> <p>2-Are them different? If so, please Explain. NIL</p> <p>3-Additional information</p> <p>FAA / EASA includes specific requirements for adecuate facilities regarding the size of the facilites where the aircraft is going to be maintained.</p> <p>FAA: Experience demonstrate that special considerations could be taken when evaluating housing requirements for AMOs, those can be found evaluating specific details for each aircraft types. Some requirements such as, hangar doors can be considered taking into consideration the type of maintenance that will be carried out for each case. Please use this information as considerations, not regualtion changes. Examples of this could be Use of curtains instead of hardcore doors.</p>

ICAO Reference			FAA (MCRs) reference	EASA reference	LARs	BCARs / MRAC	Remarks
Section		Details					
	6.5.2	The maintenance organization shall have the necessary technical data, equipment, tools and material to perform the work for which it is approved.	6.3.1.3 EQUIPMENT, TOOLS, MATERIALS, AND TECHNICAL DATA (a) An AMO shall have available the necessary equipment, tools, materials, and technical data to perform the approved scope of work, and these items shall be under full control of the AMO. The availability of equipment and tools means permanent availability except in the case of any equipment or tool that is so rarely needed that its permanent availability is not necessary. (e) The AMO shall ensure that all applicable tools, equipment, and test equipment used for product acceptance and/or for making a finding of airworthiness are calibrated to a standard acceptable to the Authority and are traceable to the [STATE] national standards.	145.A.45 Maintenance data (Regulation (EU) No 1321/2014; Regulation (EU) 2021/700) (PDF 373) (a) The organisation shall hold and use applicable current maintenance data in the performance of maintenance, including modifications and repairs. ‘Applicable’ means relevant to any aircraft, component or process specified in the organisation's approval class rating schedule and in any associated capability list. In the case of maintenance data provided by an operator or customer, the organisation shall hold such data when the work is in progress, with the exception of the need to comply with point 145.A.55(c). (b) For the purposes of this Part, applicable maintenance data shall be any of the following: 1. Any applicable requirement, procedure, operational directive or information issued by the authority responsible for the oversight of the aircraft or component;	145.325 Maintenance data (a) OMA LAR 145 must maintain and use applicable and up-to-date maintenance data to perform maintenance, including repairs and modifications. (b) For the purposes of this section applicable maintenance data should be: (1) any applicable requirement, procedure, airworthiness guideline, or data accepted or approved by the State of Registry CAA; (2) maintenance, repair and overhaul manuals, service bulletins, as well as adjustment and tolerance programs accepted or approved by the State of Registry CAA; (3) any applicable standard, such as standard maintenance practices issued by any Authority, institute or organization and which is recognized by the State of Registry CAA as a good maintenance standard; and (4) any applicable data issued in accordance with paragraph (c) of this section	BCAR 145.45 Maintenance Data (PDF 24) a) An approved maintenance organisation shall ensure that all airworthiness and maintenance data appropriate to support the work performed is received, held and used in the performance of maintenance including modifications and repairs of an aircraft component or process specified in the maintenance organization exposition. b) Applicable airworthiness and maintenance data specified in paragraph (a) refer to 1) any applicable requirements, procedures, airworthiness directive, operational directive or information issued by the Director; 2) any applicable airworthiness directive issued by the Civil Aviation Authority of a Contracting State which issued the original type certificate; 3) any applicable data, such as but not limited to, maintenance and repair manuals, issued by an organisation approved by the Civil Aviation Authority of the Contracting State, for type certificate holder, supplemental type certificate holders and any other organisation approved to publish such data by the appropriate Civil Aviation Authority of Contracting States; and 4) any applicable standard, such as but not limited to, maintenance standard practices issued by a Civil Aviation Authority of any Contracting State, institute or organisation and recognized by the Director as an acceptable standard for maintenance	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. -NIL 3-Additional information FAA: Specific information included in manufacturer manuals must be considered taking into account based on field observations, sometimes manuals available outside of the state of manufacturer are not up to date. Also, considerations must be taken on time intervals for calibrations when big changes on the calibration is noted.
			145.A.40 Equipment and tools (Regulation (EU) 2018/1142) (PDF 363) (a) The organisation shall have available and use the necessary equipment and tools to perform the approved scope of work. (i) Where the manufacturer specifies a particular tool or equipment, the organisation shall use that tool or equipment, unless the use of alternative tooling or equipment is agreed by the competent authority via procedures specified in the exposition. (ii) Equipment and tools must be permanently available, except in the case of any tool or equipment that is so infrequently used that its permanent availability is not necessary. Such cases shall be detailed in an exposition procedure. (iii) An organisation approved for base maintenance shall have sufficient aircraft access equipment and inspection platforms/docking as required for the proper inspection of	145.320 Equipment, tools and materials (a) The OMA LAR 145 must have the appropriate equipment, tools and materials necessary to perform any maintenance work within the scope of its capability list. (b) When necessary, tools, equipment and private equipment requiring calibration shall be checked and calibrated using standards acceptable to the State's CAA that granted the certification, at a frequency that ensures their correct operation and accuracy. Records of these indicated calibrations and the standard used shall be maintained by OMA LAR 145,	145.40 Equipment, Tools and Materials a) The organisation shall have available and use the necessary equipment, tools and material to perform the approved scope of work. 1) Where the manufacturer specifies a particular tool or equipment, the organisation shall use that tool or equipment, unless the use of alternative tooling or equipment is agreed by the competent authority via procedures specified in the exposition. 2) Equipment and tools must be permanently available, except in the case of any tool or equipment that is so infrequently used that its permanent availability is not necessary. Such cases shall be detailed in an exposition procedure. 3) An organisation approved for base maintenance shall have sufficient aircraft access equipment and inspection platforms/docking such that the aircraft		

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	BCARs / MRAC	Remarks
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				<p>the aircraft.</p> <p>(b) The organisation shall ensure that all tools, equipment and particularly test equipment, as appropriate, are controlled and calibrated according to an officially recognised standard at a frequency to ensure serviceability and accuracy. Records of such calibrations and traceability to the standard used shall be kept by the organisation.</p> <p>145.A.42 Components [Regulation (EU) 2019/1383]</p> <p>(a) Classification of components. All components shall be classified into the following categories:</p> <p>(v) Material, both raw and consumable, used in the course of maintenance when the organisation is satisfied that the material meets the required specification and has appropriate traceability. All material shall be accompanied by documentation clearly relating to the particular material and containing a conformity to specification statement as well as the manufacturing and supplier source.</p> <p>(b) Components, standard parts and materials for installation</p> <p>(i) The organisation shall establish procedures for the acceptance of components, standard parts and materials for installation to ensure that components, standard parts and materials are in satisfactory condition and meet the applicable requirements of point (a).</p>	<p>for the useful life of the tool or two (2) years from its last calibration, whichever occurs last.</p>	<p>can be properly inspected.</p> <p>b) The organisation shall ensure that all tools, equipment and particularly test equipment, as appropriate, are controlled and calibrated according to an officially recognised standard at a frequency to ensure serviceability and accuracy. Records of such calibrations and traceability to the standard used shall be kept by the organisation</p>	
	6.5.3	<p>The maintenance organization shall ensure that storage conditions provide adequate security and prevent deterioration of, and damage to, stored items such as parts, equipment, tools and material.</p>	<p>6.3.1.2 HOUSING AND FACILITIES</p> <p>(e) Storage facilities shall be provided for parts, equipment, test equipment, tools, and materials.</p> <p>(f) Storage conditions shall provide security for serviceable parts and segregation of serviceable from unserviceable parts and shall prevent deterioration of and damage to stored items.</p>	<p>145.A.25 Facility requirements (Regulation (EU) No 1321/2014) (PDF 332)</p> <p>The organisation shall ensure that:</p> <p>(d) Secure storage facilities are provided for components, equipment, tools and material. Storage conditions ensure segregation of serviceable components and material from unserviceable aircraft components, material, equipment and tools. The conditions of storage are in accordance with the manufacturer's instructions to prevent deterioration and damage of stored items. Access to storage facilities is restricted to authorised personnel.</p>	<p>145.310 Facilities</p> <p>(d) It must provide secure storage facilities for aircraft components, equipment, tools and materials. Storage conditions must ensure segregation between components and materials certified for clearance to service. Storage conditions should be in accordance with the manufacturer's instructions to prevent deterioration and damage to the stored items. Access to storage facilities should be restricted to unauthorized personnel.</p>	<p>BCAR 145.25 Facility Requirements (PDF 18)</p> <p>d) An aircraft maintenance organisation shall ensure that:</p> <p>3) specialized workshops and bays are segregated, as appropriate, to ensure that the environment and work area contamination is minimized;</p> <p>4) secure storage facilities are provided for parts, equipment, tools and material;</p> <p>5) storage conditions ensure segregation of serviceable aircraft components and material from unserviceable aircraft components, materials, equipment and tools;</p> <p>6) the storage conditions are in accordance with the instructions of the manufacturers, to prevent deterioration of and damage to stored items; and;</p>	<p>1-Are them equivalent? The Area Experts agree the regulations are equivalent.</p> <p>2-Are them different? If so, please Explain.</p> <p>-NIL</p> <p>3-Additional information</p> <p>FAA/ ICAO; It is recommended that the best translation for such term must be use the spanish term "Aeronavegable o No Aeronavegable". The key word here is to understand thart the part is or not airworthy.</p> <p>Saint Marteen: The correct translation should be using "Airworthiness in spanish". Using the term in spanish "Usable", takin into account a debate with a lawyer, clarifications on how much usable is a component, this could cause uncertainty.</p>

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Personnel

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks	
Section	Details						
6	6.6	6.6.1 The maintenance organization shall nominate an accountable executive who, irrespective of other functions, is accountable on behalf of the organization.	6.4 ADMINISTRATION 6.4.1.1 PERSONNEL (a) An AMO shall nominate an accountable manager who, irrespective of other functions, is accountable on behalf of the organisation.	145.A.30 Personnel requirements Regulation (EU) No 1321/2014 (a) The organisation shall appoint an accountable manager who has corporate authority for ensuring that all maintenance required by the customer can be financed and carried out to the standard required by this Part. The accountable manager shall: 1. ensure that all necessary resources are available to accomplish maintenance in accordance with point 145.A.65(b) to support the organisation approval. 2. establish and promote the safety and quality policy specified in point 145.A.65(a). 3. demonstrate a basic understanding of this Annex (Part-145).	Chapter D: Rules of Operation 145.305 Certification personnel (e) The manager in charge shall be responsible, on behalf of OMA LAR 145, for issuing the renewal of certification authorizations to the certification personnel. The manager in charge may delegate this function to others in accordance with the procedure specified in the maintenance organization manual (MOM).	BCAR 145.30 Requirements for the Management Personnel (PDF 18-19) c) An applicant for an approved maintenance organisation certificate shall nominate a person as the Accountable Manager, acceptable to the Director, responsible for establishing and promoting the safety and quality policy with corporate authority for ensuring that maintenance, preventive maintenance and modification for which the aircraft maintenance organisation is authorised to perform can be financed and aircraft maintenance organization is authorised to perform can be financed and carried out to the standard required by the Director.	1-Are them equivalent? The Area Experts agree the regulations are equivalent. except for EASA 2-Are them different? If so, please Explain. La diferencia del MCAR y el EASA serian los puntos 2 y 3. Tenemos los MCARs, pero hemos enmendado utlizando algunos temas de EASA. 3-Additional information Add hyperlinks
		6.6.2 The maintenance organization’s accountable executive shall nominate a person or group of persons whose responsibilities include ensuring that the maintenance organization is in compliance with the requirements of 6.2.1 and 6.2.2.	6.4 ADMINISTRATION 6.4.1.1 PERSONNEL (b) The accountable manager shall nominate a person or group of persons, acceptable to the Authority, whose responsibilities shall include ensuring that the AMO is in compliance with the requirements of this part. (1) The person or persons nominated shall represent the maintenance management structure of the AMO and shall be responsible for all functions specified in this part. (2) Nominated managers shall be directly responsible to the accountable manager, who shall be acceptable to the Authority.	145.A.30 Personnel requirements Regulation (EU) No 1321/2014 (b) The organisation shall nominate a person or group of persons, whose responsibilities include ensuring that the organisation complies with this Part. Such person(s) shall ultimately be responsible to the accountable manager. 1. The person or persons nominated shall represent the maintenance management structure of the organisation and be responsible for all functions specified in this Part. 2. The person or persons nominated shall be identified and their credentials submitted in a form and manner established by the competent authority. 3. The person or persons nominated shall be able to demonstrate relevant knowledge, background and satisfactory experience related to aircraft or component maintenance and demonstrate a working knowledge of this Part.	145.205 Safety policy and objectives (c) Designation of key safety personnel. (1) The OMA LAR 145 must designate the manager in charge to whom it will give the necessary authority to ensure that all maintenance performed by the organization can be financed and carried out in accordance with its SMS and as required by these Regulations. (2) The manager in charge must: (i) guarantee the availability of human, financial and other resources required to perform maintenance according to the scope of the organization's capabilities list; (ii) ensure that all personnel comply with the OMA SMS and the requirements of these Regulations; (iii) ensure that safety and quality policy is understood, implemented and maintained at all levels of the organization; (iv) demonstrate basic knowledge of these regulations; (v) have direct responsibility for the conduct of the organization's affairs; (vi) have the ultimate responsibility and accountability for the implementation and	BCAR 145.30 Requirements for the Management Personnel d) The Accountable Manager shall nominate a management person or group of management persons (hereinafter referred to as "the nominated managers") whose responsibilities include ensuring that the approved maintenance organisation is in compliance with these Regulations.	1-Are them equivalent? The Area Experts agree the regulations are equivalent. except for EASA 2-Are them different? If so, please Explain. EASA requirements exceeds the SARPS in items 2 and 3. 3-Additional information Some states are using combination of requirements using aspects taken from MCARs and EASA, sometimes including more restrictive wording.

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks	
Section	Details						
		6.6.3 The maintenance organization shall employ the necessary personnel to plan, perform, supervise, inspect and release the maintenance work to be performed.	6.4 ADMINISTRATION 6.4.1.1 PERSONNEL (c) An AMO shall employ sufficient personnel to plan, perform, supervise, inspect, and approve for return to service the maintenance work to be performed.	145.A.30 Personnel requirements Regulation (EU) No 1321/2014 (d) The organisation shall have a maintenance man-hour plan showing that the organisation has sufficient staff to plan, perform, supervise, inspect and quality monitor the organisation in accordance with the approval. In addition the organisation shall have a procedure to reassess work intended to be carried out when actual staff availability is less than the planned staffing level for any particular work shift or period. 145.A.50 Certification of maintenance Regulation (EU) 2020/270 (a) A certificate of release to service shall be issued by appropriately authorised certifying staff on behalf of the organisation when it has been verified that all maintenance ordered has been properly carried out by the organisation in accordance with the procedures specified in point 145.A.70, taking into account the availability and use of the maintenance data specified in point 145.A.45 and that there are no non-compliances which are known to endanger flight safety. (b) A certificate of release to service shall be issued before flight at the completion of any maintenance.	Chapter D: Rules of Operation 145.300 Personnel involved in maintenance (a) The OMA LAR 145 must have sufficient personnel to plan, perform, supervise, inspect and monitor the processes and procedures of the maintenance organization, in accordance with its approval, as well as for the implementation, administration and continuity of the SMS, taking into consideration the personnel's break periods.	BCAR 145.30 Requirements for the Management Personnel b) An approved maintenance organisation shall employ the necessary personnel to plan, perform, supervise, inspect and release the work to be performed. g) The approved maintenance organisation shall have a maintenance man-hour plan showing that the organisation has sufficient staff to plan, perform, supervise, inspect, issue certificate of release to service and monitor the quality of the activities performed by the organisation in accordance with the approval. l) An approved maintenance organisation shall issue a company authorisation in writing to appropriately qualified engineers within his organisation, to issue a certificate of release to service for aircraft and their associated aircraft components following satisfactory completion of maintenance. m) A company authorisation to issue a certificate of release to service referred to in paragraph (l), shall clearly specify the scope and limits of such company authorisation and contains a unique company authorisation number in respect of each certifying staff.	1-Are them equivalent? The Area Experts agree the regulations are equivalent. except for EASA 2-Are them different? If so, please Explain. EASA, LARS and BCAR/MRAC requirements includes the quality monitoring. 3-Additional information N/A
		6.6.4 The maintenance organization shall establish the competence of maintenance personnel in accordance with procedures and to a level acceptable to the Contracting State granting the approval. If the person signing the maintenance release is a non-licensed person, the person shall meet the qualification requirements specified in Annex 1 — Personnel Licensing to sign a maintenance release.	6.4 ADMINISTRATION 6.4.1.1 PERSONNEL (d) An AMO shall establish the competence of maintenance personnel in accordance with procedures and to a level acceptable to the Authority. (e) Each supervisor in the AMO shall hold an AMT licence issued in accordance with Part 2 of these regulations. (f) The person signing an approval for return to service shall be qualified in accordance with Part 2 of these regulations, as appropriate to the work performed, and shall be acceptable to the Authority. (g) An AMO that uses an ARS shall ensure that ARS is employed by the AMO and is licensed in accordance with Part 2 of these regulations.	145.A.30 Personnel requirements Regulation (EU) No 1321/2014 (e) The organisation shall establish and control the competence of personnel involved in any maintenance, airworthiness reviews, management and/or quality audits in accordance with a procedure and to a standard agreed by the competent authority. In addition to the necessary expertise related to the job function, competence must include an understanding of the application of human factors and human performance issues appropriate to that person's function in the organisation. ‘Human factors’ means principles which apply to aeronautical design, certification, training, operations and maintenance and which seek safe interface between the human and other system components by proper consideration of human performance. ‘Human performance’ means human capabilities and limitations which have an impact on the safety and efficiency of aeronautical operations.	Chapter D: Rules of Operation 145.300 Personnel involved in maintenance (b) The OMA LAR 145 must establish and control the competence of all personnel involved in maintenance and SMS, inspection system and quality system activities, in accordance with a procedure acceptable to the CAA, including an initial and ongoing training program. (1) The training program should ensure that all personnel involved in maintenance have up-to-date knowledge of the organization's technical and procedural knowledge, including training on aspects related to human performance. 145.305 Certification personnel The OMA LAR 145 must ensure that the certifying personnel possess a current aircraft maintenance mechanic license issued by the local CAA; and have adequate knowledge of the aircraft and/or aircraft components to be maintained and the associated maintenance organization procedures prior to being issued	BCAR 145.31 Maintenance Personnel a) An approved maintenance organisation shall establish and control the competence of personnel involved in any maintenance, maintenance management, inspection, and quality audit in accordance with an acceptable procedure agreed by the BDCA. In addition to the specialized knowledge to carry out their task, competence shall include the understanding of the application of the appropriate elements on human factors and human performance to the positions of these persons in the organization. BCAR 145.35 Certifying Staff b) An approved maintenance organisation may issue or re-issue a company authorisation to a qualified person where that person 1) holds a valid Type Rated Belizean aircraft maintenance engineer licence issued under the Belize Civil Aviation Regulation(BCAR APL Part 10 or an equivalent qualification approved by the Director, which attests to his knowledge and experience; c) A person issued company authorisation	1-Are them equivalent? The Area Experts agree the regulations are equivalent. except for the provisions for certifying staff without licence. 2-Are them different? If so, please Explain. EASA, LARS and BCAR/MRAC that does not have provisions certifying staff without licence 3-Additional information N/A

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
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					or renewed with a LAR 145 certification authorization. The OMA LAR 145 must ensure that all personnel issuing maintenance conformity certification of an aircraft or aircraft component have exercised the privileges of their LAR 145 certification authorization within a six (6) month period in the last two (2) years.	by an approved maintenance organisation in paragraph (b), shall be referred to as an "certifying staff" under these Regulations.	
		6.6.5 The maintenance organization shall ensure that all maintenance personnel receive initial and continuation training appropriate to their assigned tasks and responsibilities. The training programme established by the maintenance organization shall include training in knowledge and skills related to human performance, including coordination with other maintenance personnel and flight crew.	6.4 ADMINISTRATION 6.4.1.1 PERSONNEL (h) Maintenance personnel and certifying staff shall meet the qualification requirements and shall receive initial, recurrent, and specialised training appropriate to their assigned tasks and responsibilities, in accordance with a training programme approved by the Authority. (i) The training programme established by the AMO shall include training in knowledge and skills related to human performance, including coordination with other maintenance personnel and certifying staff.	145.A.35 Certifying staff and support staff (Regulation (EU) No 1321/2014) (d) The organisation shall ensure that all certifying staff and support staff receive sufficient continuation training in each two year period to ensure that such staff have up-to-date knowledge of relevant technology, organisation procedures and human factor issues. (e) The organisation shall establish a programme for continuation training for certifying staff and support staff, including a procedure to ensure compliance with the relevant points of 145.A.35 as the basis for issuing certification authorisations under		BCAR 145.31 Maintenance Personnel b) The BCAR 145 AMO shall establish and put into practice an initial training programme and continuation training appropriate to their assigned tasks and responsibilities, at least every two years, to ensure that the person in charge of maintenance updates his knowledge regarding technologies, procedures of the organization and human factors.	1-Are them equivalent? The Area Experts agree the regulations are equivalent. Regulations are not in fully compliance with the SARP requirement regarding with the coordination training. 2-Are them different? If so, please Explain. Only the MCARs includes coordination with other maintenance personnel and certifying staff. 3-Additional information Neither EASA, LARs nor BCAR/MRAC includes training regarding coordination with other maintenance personnel and flight crew.

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Records

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section		Details					
6.7	6.7.1	The maintenance organization shall retain detailed maintenance records to show that all requirements for the signing of a maintenance release have been met.	6.5.1.7 APPROVAL FOR RETURN TO SERVICE OR AN AIRCRAFT OR AERONAUTICAL PRODUCT (a) An approval for return to service of an aircraft shall be made by appropriately authorised certifying staff when they are satisfied that all required maintenance of the aircraft has been properly performed by the AMO in accordance with the AMO Procedures Manual. 6.5.1.8 MAINTENANCE RECORDS (a) The AMO shall record, on a form and in a manner acceptable to the Authority, all details of maintenance work performed. (b) The AMO shall provide a copy of each approval for return to service to the air operator, together with a copy of any specific airworthiness data used for repairs or modifications performed.	145.A.55 Maintenance and airworthiness review records (Regulation (EU) 2020/270) (a) The organisation shall record all details of maintenance work carried out. As a minimum, the organisation shall retain records necessary to prove that all requirements have been met for the issue of the certificate of release to service, including subcontractor's release documents, and for the issue of any airworthiness review certificate.	145.335 Maintenance records (a) The OMA LAR 145 must record all details of work performed in accordance with LAR 43, Section 43.405. 43.405 Record Requirements for Maintenance conformity (a) The maintenance conformity will be completed and signed in the technical flight log of the aircraft, to certify that the maintenance work performed was completed satisfactorily according to the maintenance data updated.	BCAR 145.55 Maintenance Records (PDF 26) a) An approved maintenance organisation shall record all details of maintenance work carried out on Belizean aircraft and its aircraft components, in a form acceptable to the Director. As a minimum, the organization shall retain records necessary to prove that all requirements have been meet for issuance of the certificate of release to service. b) An approved maintenance organisation shall provide a copy of each certificate of release to service to the aircraft operator, together with a copy of any specific approved repair modification airworthiness data used for repairs or modifications carried out.	1-Are them equivalent? The Area Experts agree the regulations are equivalent. 2-Are them different? If so, please Explain. N/A 3-Additional information N/A
	6.7.2	The records required by 6.7.1 shall be kept for a minimum period of one year after the signing of the maintenance release.	(c) The AMO shall retain a copy of all detailed maintenance records and any associated airworthiness data for 2 years from the date the aircraft or aeronautical product to which the work relates was returned to service from the AMO	145.A.55 Maintenance and airworthiness review records (Regulation (EU) 2020/270) (c) The organisation shall retain a copy of all detailed maintenance records and any associated maintenance data for three years from the date on which the aircraft or component to which the work relates was issued with a certificate of release to service. In addition, it shall retain a copy of all the records related to the issue of airworthiness review certificates for three years from the date of issue and shall provide a copy of them to the owner of the aircraft. 1. The records under this point shall be stored in a manner that ensures protection from damage, alteration and theft. 2. All computer hardware used to ensure backup shall be stored in a different location	145.335 Maintenance records (b)The OMA LAR 145 must provide the aircraft operator or owner of the aircraft with a copy of each maintenance conformity certification issued, along with a copy of any maintenance data approved or accepted by the State of Registry CAA to be used for major repairs or modifications. (c) The AMO shall retain a copy of all detailed maintenance records and any associated airworthiness data for 2 years from the date the aircraft or aeronautical product to which the work relates was returned to service from the AMO	BCAR 145.55 Maintenance Records (PDF 26) c) An approved maintenance organisation shall retain a copy of all detailed maintenance records and any associated airworthiness data for 2 years from the date the aircraft or aircraft component was issued a certificate of release to service.	1-Are them equivalent? The Area Experts agree the regulations are equivalent and more restrictive than the SARPs. 2-Are them different? If so, please Explain. EASA includes provisions for 3 years as minimum time for records keeping. 3-Additional information N/A

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section		Details					
	6.7.3	Records kept in accordance with 6.7 shall be maintained in a form and format that ensures readability, security and integrity of the records at all times.	6.5.1.8 MAINTENANCE RECORDS (d) Each person who maintains, overhauls, modifies, repairs, or inspects an aircraft or aeronautical product shall make an entry in the maintenance record of that equipment, including: (1) A description and reference to data acceptable to the Authority of work performed. (2) The date of completion of the work performed. (3) The name of the person performing the work if other than the person specified in this subsection. (4) If the work performed on the aircraft or aeronautical product has been performed satisfactorily, the authorised signature, the AMO certificate number, and the type of license or certificate held by the person approving the work. (5) The authorised signature, the AMO certificate number, and the type of license held by the person approving or disapproving for return to service the aircraft or aeronautical product. Note: The signature constitutes the approval for return to service only for the work performed. (e) In addition to the entry required by paragraph 6.5.1.8(d) of this subsection, each person performing a major repair or major modification shall record such work on a form, and shall disposed of the form in the manner prescribed by IS 5.6.1.1(B) of these regulations.	from that containing the working data in an environment that ensures they remain in good condition.	Appendix 1 Maintenance Organization Manual Part 1 2.5 A description of the method employed to complete and retain the maintenance records required in Section 145.335 of these regulations; 2.6 A computerized maintenance records control system and methods used for data backup;	BCAR 145.55 Maintenance Records (PDF 27) c) An approved maintenance organisation shall retain a copy of all detailed maintenance records and any associated airworthiness data for 2 years from the date the aircraft or aircraft component was issued a certificate of release to service. 1) Records under this paragraph shall be stores in a safe way with regards to fire, flood and theft 2) Computer back discs, tapes etc shall be stored in a different location from that containing the working discs, tapes etc, in an environment that ensures they remain in good condition. 3) Where an organization approved under this Regulation teminates its operation, all retained maintenance records covering the last two years shall be distributed to the last owner or customer of the respective aircraft or component or shall be stored as specified by the Director.	1-Are them equivalent? The Area Experts agree that only two regulations are equivalent. Only EASA and BCAR/MRAC complies with the aim of the SARPs 2-Are them different? If so, please Explain. MCARs and LARs does not includes the provisions of the SARPs. 3-Additional information N/A

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section		Details					
6.8	6.8.1	A maintenance release shall be completed and signed to certify that the maintenance work performed has been completed satisfactorily and in accordance with approved data and the procedure described in the maintenance organization’s procedures manual.	<p>6.5.1.7 APPROVAL FOR RETURN TO SERVICE OR AN AIRCRAFT OR AERONAUTICAL PRODUCT (a) An approval for return to service of an aircraft shall be made by appropriately authorised certifying staff when they are satisfied that all required maintenance of the aircraft has been properly performed by the AMO in accordance with the AMO Procedures Manual.</p> <p>6.5.1.7 APPROVAL FOR RETURN TO SERVICE OR AN AIRCRAFT OR AERONAUTICAL PRODUCT (c) An approval for return to service shall be used for the return of an aircraft or aeronautical product or assembly and shall adhere to the following items. (2) An approval for return to service shall reference the data specified in the manufacturer’s maintenance instructions or instructions for continuing airworthiness.</p>	<p>145.A.50 Certification of maintenance (Regulation (EU) 2020/270) (a) A certificate of release to service shall be issued by appropriately authorised certifying staff on behalf of the organisation when it has been verified that all maintenance ordered has been properly carried out by the organisation in accordance with the procedures specified in point 145.A.70, taking into account the availability and use of the maintenance data specified in point 145.A.45 and that there are no non-compliances which are known to endanger flight safety.</p>	<p>145.330 Maintenance conformity</p> <p>(a) After maintenance is performed, a maintenance conformity certification (sign-off) must be issued by the personnel authorized to certify on behalf of the OMA LAR 145, certifying that the maintenance work performed on the aircraft has been properly performed by the OMA, in accordance with the procedures specified in the maintenance organization manual, taking into consideration the availability and use of the maintenance data specified in section 145.325 of this Regulation. (b) The maintenance conformity certification (sign-off) shall be completed and signed in the aircraft technical log, to certify that the maintenance work performed was satisfactorily completed according to updated maintenance data and the procedures described in the MOM of the OMA LAR 145.</p>	<p>BCAR 145.50 Certificate of Release to Service (PDF 26)</p> <p>a) A certificate of release to service shall be issued by an appropriate certifying staff on behalf of the approved maintenance organisation when such certifying staff is satisfied that all maintenance required by the operator of the Belizean aircraft or its aircraft components, has been properly carried out by the approved maintenance organisation in accordance with procedures specified in the maintenance organization exposition of the approved maintenance organisation, taking into account the availability and use of the maintenance data specified in 145.45 and that there are no non-compliances which are known that hazard seriously the flight safety.</p>	<p>1-Are them equivalent? The Area Experts agree the regulations are equivalent.</p> <p>2-Are them different? If so, please Explain. N/A</p> <p>3-Additional information MCARs use a different wording but it complies with the AIM of the SARP.</p>
	6.8.2	A maintenance release shall be signed and include the following:	<p>6.5.1.7 APPROVAL FOR RETURN TO SERVICE OR AN AIRCRAFT OR AERONAUTICAL PRODUCT (c) An approval for return to service shall be used for the return of an aircraft or aeronautical product or assembly and shall adhere to the following items. (1) An approval for return to service shall contain the following statement: “Certifies that the work specified was performed in accordance with current regulations and with respect to that work the aircraft or aeronautical product is considered approved for return to service.” (2) An approval for return to service shall reference the data specified in the</p>	<p>145.A.45 Maintenance data (Regulation (EU) No 1321/2014) (a) The organisation shall hold and use applicable current maintenance data in the performance of maintenance, including modifications and repairs. ‘Applicable’ means relevant to any aircraft, component or process specified in the organisation's approval class rating schedule and in any associated capability list. (b) For the purposes of this Part, applicable maintenance data shall be any of the following: 1. Any applicable requirement, procedure, operational directive or information issued by</p>	<p>145.330 Maintenance conformity (c) The maintenance conformity shall contain the provisions of LAR 43.405 (b)</p>	<p>BCAR 145.50 Certificate of Release to Service (PDF 26) c) A certificate of release to service shall contain 1) basic details of the maintenance carried out including detailed reference of the approved data used;(SARP 6.8.2 (a)) 2) the date such maintenance was completed;(SARP 6.8.2 (b)) 3) the name, unique authorisation number of the certifying staff and his signature or stamp;(SARP 6.8.2 (d)) 4) name and certificate number of the approved maintenance organisation;(SARP 6.8.2 (c)) and</p>	<p>1-Are them equivalent? The Area Experts agree the regulations are equivalent.</p> <p>2-Are them different? If so, please Explain. N/A</p> <p>3-Additional information N/A</p>

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section		Details					
		a) basic details of the maintenance carried out including detailed reference to the data used;	manufacturer's maintenance instructions or instructions for continuing airworthiness	the authority responsible for the oversight of the aircraft or component; 2. Any applicable airworthiness directive issued by the authority responsible for the oversight of the aircraft or component; 4. Any applicable standard, such as but not limited to, maintenance standard practices recognised by the Agency as a good standard for maintenance; 5. Any applicable data issued in accordance with point (d). (See above 145.A.50 Certification of maintenance for details of maintenance)	43.405 Record Requirements (Maintenance conformity) (a) The maintenance conformity will be completed and signed in the aircraft flight technical log, to certify that the maintenance work performed was completed satisfactorily in accordance with the current maintenance data.(SARP 6.8.2 (a)) (b) The maintenance conformity indicated in paragraph (a) of this section shall contain a certification indicating: (1) The basic details of the maintenance carried out, including a detailed reference to the current maintenance data; (2) The place where the maintenance release was issued; (3) The date such maintenance was completed;(SARP 6.8.2 (b)) (4) The name of the person issuing the certification; (SARP 6.8.2 (c))and (5) The number of the specific license granted or validated by the CAA of the State of registration of the person issuing the certification or the identity and number of the Certificate of Approval of the OMA LAR 145 that issues the certification (SARP 6.8.2 (c))		

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section		Details					
		b) the date such maintenance was completed;	6.5.1.7 APPROVAL FOR RETURN TO SERVICE OR AN AIRCRAFT OR AERONAUTICAL PRODUCT (c) An approval for return to service shall be used for the return of an aircraft or aeronautical product or assembly and shall adhere to the following items. (4) The date such maintenance was performed shall include when the maintenance took place relative to any life or overhaul limitation in terms of date, flying hours, cycles, landings, etc., as appropriate.	145.A.50 Certification of maintenance (Regulation (EU) 2020/270) (d) A certificate of release to service shall be issued after the required maintenance on a component whilst off the aircraft has been carried out. The authorised release certificate ‘EASA Form 1’ referred to in Appendix II of Annex I (Part-M) constitutes the component certificate of release to service except if otherwise specified in point M.A.502 of Annex I (Part-M) or ML.A.502 of Annex Vb (Part-ML), as applicable. When an organisation maintains a component for its own use, an EASA Form 1 may not be necessary depending upon the organisation's internal release procedures defined in the exposition. AMC M.A.801(e) Aircraft certificate of release to service (ED Decision 2020/002/R) 1. The aircraft certificate of release to service should contain the following statement: (a) 'Certifies that the work specified except as otherwise specified was carried out in accordance with Part-M and in respect to that work the aircraft is considered ready for release to service'.			1-Are them equivalent? The Area Experts agree the regulations are equivalent except for EASA. 2-Are them different? If so, please Explain. EASA does not include provisions for date of the maintenance on the 145 section, but in the operator section. 3-Additional information N/A

ICAO Reference		FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section	Details					
	c) the identity of the approved maintenance organization; and	6.5.1.7 APPROVAL FOR RETURN TO SERVICE OR AN AIRCRAFT OR AERONAUTICAL PRODUCT (c) An approval for return to service shall be used for the return of an aircraft or aeronautical product or assembly and shall adhere to the following items. (8) When an aeronautical product is returned to service, the AMO shall complete an AAT (Aircraft Airworthiness Tag) on a form and in a manner as prescribed in IS 6.5.1.7.	(b) For a Pilot-owner a certificate of release to service should contain the following statement: 'Certifies that the limited pilot-owner maintenance specified except as otherwise specified was carried out in accordance with Part-M and in respect to that work the aircraft is considered ready for release to service'. 2. The certificate of release to service should relate to the task specified in the manufacturer's or operator's instruction or the aircraft maintenance programme which itself may cross-refer to a manufacturer's/operator's instruction in a maintenance manual, service bulletin etc. 3. The date such maintenance was carried out should include when the maintenance took place relative to any life or overhaul limitation in terms of date/flying hours/cycles/ landings etc., as appropriate. 4. When extensive maintenance has been carried out, it is acceptable for the certificate of release to service to summarize the maintenance so long as there is a unique cross-reference to the work-pack containing full details of maintenance carried out. Dimensional information should be retained in the work-pack record. 5. The person issuing the certificate of release to service should use his normal signature except in the case where a computer release to service system is used. In this latter case			1-Are them equivalent? The Area Experts agree that LARs and BCAR/MRAC the regulations are equivalent. 2-Are them different? If so, please Explain. MCARs and EASA does not include provisions as required by SARPs. 3-Additional information a)MCARS does not have a specific reference in compliance with the SARP, however make reference to a form which contains the required information. b)EASA does not include provisions for identity of the OMA in the maintenance on the 145 section, but in the operator section AMC M.A.801(e)

ICAO Reference			FAA (MCARs) reference	EASA reference	LARs	BCAR / MRAC	Remarks
Section		Details					
		d) the identity of the person or persons signing the release.	6.5.1.7 APPROVAL FOR RETURN TO SERVICE OR AN AIRCRAFT OR AERONAUTICAL PRODUCT (c) An approval for return to service shall be used for the return of an aircraft or aeronautical product or assembly and shall adhere to the following items (6) The person issuing the approval for return to service shall use a full signature and preferably a certification stamp except in a case in which a computer return to service system is used. In this latter case, the Authority will need to be satisfied that only that particular person can electronically issue the approval for return to service.	the competent authority will need to be satisfied that only the particular person can electronically issue the release to service. One such method of compliance is the use of a magnetic or optical personal card in conjunction with a personal identity number (PIN) known only to the individual, which is keyed into the computer. A certification stamp is optional. 6. At the completion of all maintenance, owners, certifying staff, operators and maintenance organisations should ensure they have a clear, concise, legible record of the work performed. 7. In the case of an M.A.801(b)1 release to service, certifying staff should retain all records necessary to prove that all requirements have been met for the issuance of a certificate of release to service.			1-Are them equivalent? The Area Experts agree that MCARs, LARs and BCAR/MRAC the regulations are equivalent. 2-Are them different? If so, please Explain. EASA does not include provisions as required by SARPs. 3-Additional information EASA does not include provisions for identity of the OMA in the maintenance on the 145 section, but in the operator section AMC M.A.801(e)