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PART-66 AND PART-147 EASA STANDARD REQUIREMENTS – PROBLEMS OF IMPLEMENTATION IN UKRAINE

The peculiarities of the implementation in Ukraine of the EASA maintenance training standards are reviewed and analyzed. The factors that determine the process of implementation in Ukraine, as well as the problems of ensuring the proper implementation of these standards are identified

The necessity of EASA standard requirements implementation in Ukraine, particularly Part-66 and Part-147 [1-3] (further – EASA requirements), is conditioned by the agreements, that were reached within the frames of negotiations on a new basic agreement on association between Ukraine and European Union (further – EU).

The main positive result of the implementation of mentioned EASA requirements should be the simplification of the procedures that accompanying “migration” processes of the maintenance personal either from Ukraine to EU countries or from those countries to Ukraine. It will be achieved by creating conditions for full or partial mutual recognition by the states as the training and aircraft maintenance license, and also diplomas on corresponding aviation education.

Main peculiarities of implementation process of EASA requirements are conditioned at least by following:

- presence of a new (relatively to currently used in Ukraine) component in the EASA maintenance personal training system - basic training, volume and content of which are established by appendix 1 to Part-66. Mentioned new component puts an existing Ukrainian system of aviation educational training in position, when there is the necessity to prove (either educational institutions, or graduating students) that this system provides and ensure to the maintenance personal the training that is at least equal to implemented basic training. In other words, initially, when there is the recognized positive application practice of each considered maintenance personal training and approval system, there is an implicit rejection of the completeness and consistency of the existing aviation educational training in Ukraine and principles of its recognition by Civil Aviation Authorities (further, according to international practice, - CAA) of Ukraine;

- preparation and implementation of EASA requirements is the sphere of responsibility of CAA of Ukraine. In this regard CAA of Ukraine, on the basis of carried target research works, should provide both detection and evaluation of differences between maintenance personal training and corresponding certificate issuance systems, and also creation of conditions that providing minimization of negative consequences of evident and hidden risk of the EASA requirements implementation. Herewith the efficiency and effectiveness of Ukrainian CAA actions on the stage of preparation to implementation of the EASA requirements and on the stage of its ex-

education will be largely conditioned by preparedness of CAA and its position/role (active or passive [6, p. 77-82, 7]) within each of these stages.

Despite the common basis [7], within which were formed every of maintenance personal training and approval systems that are used within EASA and Ukraine, certain differences between those systems existed and will remained. Note, that the similar situation takes place for acting in EASA and in Ukraine maintenance personal training and maintenance approval systems relatively to similar systems of other ICAO member states, for example FAA [8].

Formation of these differences took place in the framework of relevant traditions and specifics of evolution and transfer processes of the arrangement and development of aviation activity within EASA member states and Ukraine. Those processes were significantly intensified during last decades on a background of processes of globalization, liberalization and deregulation that are typical for modern world economics.

Mentioned differences determine either advantages or disadvantages of every of discussed systems. At the same time, manifestation of peculiarities of mentioned advantages and disadvantages are conditioned by specific terms of functioning of those systems.

Therefore:

- EASA requirements are only one of possible ways of implementation (on the level regional group of state) of the ICAO requirements to the procedures for approval of considered objects of regulation in the sphere of airworthiness that are implemented in respect to conditions and specifics of EU states and taking into account peculiarities of structure and regulation of aviation activity in those countries;
- implementation of those requirement in conditions of Ukraine should not be considered as fundamental change in the substance of the relevant objects of regulation.

It is important to notice that basic training and requirements for it (appendix 1 to Part-66) «are not inserted» in education system that exist in Ukraine. That's why at the current moment even the license which obtained in accordance with EASA requirements can't be used by its holder as the frame for confirmation of education level on the basis of provisions of normative documents that acting in the education sphere of Ukraine.

Within considered situation of EASA requirements implementation, initially were supposed that basic training which provided under the appendix 1 to Part-66 requirements are complete and sufficient training either for the personal that perform and certifying the maintenance or for the personal that practicing in providing the functions of continuing airworthiness planning and management at Part-145 and/or Part-M approved organizations.

In connection with this, within the task of identifying the differences between the training and approval systems of the maintenance personal and in relation to the considered conditions of EASA requirements implementation, it is also interesting to consider opposite task – to determine correspondence and differences of EASA requirements in relation to the requirements of regulation rules acting in Ukraine [4,5] or, for example, to FAA requirements [8]. That is to put EASA requirements in position at which the maintenance personal training and approval sys-

tem of the Ukraine is putted during the process of the EASA requirements implementation in Ukraine.

Analysis, that have been carried out by the authors, has revealed the existence of incompleteness elements at EASA requirements to the basic training in relation to the demands that have acted in Ukraine and also that the basic training modules do not form complete education, that provide graduator proficiency in the following:

- perception of a new ideas and technologies in design, production and maintenance of aircrafts and their components, the implementation and renovation of which occurs today with increasing intensity;

- perform the maintenance management functions at Part-145 organizations and functions of a continuing airworthiness management personal at Part-M organization because appendix 1 of Part-66 does not provide the corresponding training subjects and theirs existing fragments are clearly insufficient.

That's why EASA requirements implementation should not:

- «cancel» proven practice of maintenance personal basic training in Ukraine, but vise versa - to promote its due consolidation and development;

- be realized by the direct transfer from conditions of EU member-states to the conditions of Ukraine without corresponding adaptation, arrangement and implementation accompaniment from the side of CAA of Ukraine, because this can generate a chain of meaningful risks, negative consequences of which (long-term especially) are important to foresee with maximum possibility and parry in the proper way.

Conclusions

To the list of urgent questions, that demanding proper consideration during EASA requirements implementation the authors specify the following:

- interconnected and interdependent consideration of two problems: conversion of available aircraft maintenance license (Conversion report), and recognition of previously obtained type/task and basic training on the basis of examination credit report. Relatively to this questions, if necessary, to develop the more detailed (customized to the condition of implementation) Acceptable Means of Compliance (AMC) or so-called Alternative Method of Compliance (AMOC), which take into account conditions and peculiarities of Ukraine and provide preservation and further development of positive distinctions of present aviation educational training;

- allocation and detailed description of general components of transfer process for the EASA requirements implementation and its carrying without decreasing of flight safety and maintenance culture, for example, due to of necessity of meaningful redistribution of functions of maintenance tasks certification that carried out by the staff of the Part-145 approved maintenance organizations or from the deficit of certifying staff with the required set of authority;

- construction of transfer process in such way, when the aroused difficulties would not became the problems only for subjects of activity (natural persons and/or organizations) it affected;

- ensuring that during transfer process to the EASA requirements the flight safety and maintenance culture levels be supported and global tendencies in develop-

ment and separation of markets of aircrafts and their components utilization and MRO (Maintenance, Repair&Overhaul) will be taking in account in order not to carry to Ukraine the disadvantages of these requirements during transfer process.

It is proposed to recognize as a good practice the creation of working groups of experts which presented the industrial, educational and scientific organizations at aviation field. These experts possess, at least, recommendation authorities and monitoring the process of EASA requirements implementation in order to ensure the efficient reaction on arising problems, and also initiate and/or prepare the projects of required documents.

References

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