







EASA CRD-2 to NPA 2010-10 (Part-T)
 Comment period till 4 June 2012

Background

Highlights CRD-2 NPA 2010-10	Reference	IACA comments to CRD-2 NPA 2010-10
On 2 September 2010, IACA addressed a first letter on dry lease-in to the EASA Rulemaking Director.	 1st IACA letter 2Sep2010	
The second IACA letter on dry lease-in of 6 December 2010 is attached in Appendix A of CRD.	CRD p40, Comment #60 CRD p93, Attachment #3  2nd IACA letter 6Dec2010	
On 18 February 2011, a small IACA delegation met with the EASA Rulemaking Director and his team to discuss the issue of dry leasing-in third country aircraft by EU operators.	 Meeting EASA-IACA 18Feb2011	
On 5 July 2011, IACA drafted proposal to amend the applicable regulation for the dry lease-in of foreign registered aircraft used by EU operators, and provided to EASA for consideration during the drafting of the CRD on NPA 2010-10.	 IACA Proposal	
The CRD-2 requirements are aimed at ensuring that third-country registered aircraft comply with the essential requirements of the Basic Regulation, and that they have been drafted taking into account the proposals made by the commentators.	CRD p7: paragraph 28	



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Objective CRD-2

Highlights CRD-2 NPA 2010-10	Reference	IACA comments to CRD-2 NPA 2010-10
Alignment of the Continuing Airworthiness Regulation 2042/2003 with the Basic Regulation (216/2008) and with ICAO Annex 6 requirement for human factor principles to be observed in the design and application of the aircraft maintenance programme.		
Specifically addresses third-country registered aircraft operated by EU operators [Art.4(1)(c) of the Basic Regulation]. Not less than 58 of the 131 comments to NPA 2010-10 (44%) were related to this Issue 3.		
Regulation 2042/2003 (Continuing Airworthiness IR) Annex I PART-M Annex II PART-145 Annex III PART-66 Annex IV PART-147 Annex V PART-T (newly introduced per this CRD-2)	CRD p72: Annex V (PART-T)	

Part-ORO

Highlights CRD-2 NPA 2010-10	Reference	IACA comments to CRD-2 NPA 2010-10
Amended to include the operation of third-country registered aircraft dry leased-in by EU operators.	CRD p83: ORO.AOC.100(c)	
Amended to preclude dry lease-in of aircraft registered in a State from an operator subject to an operating ban pursuant to Regulation 2011/2005 (“black list”).	CRD p83: ORO.AOC.110(b)	
Amended to require third-country registered aircraft to be equipped i.a.w. Regulation 1332/2011 (ACAS).	CRD p83: ORO.AOC.110(d)	



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Code-share of third-country registered aircraft

Highlights CRD-2 NPA 2010-10	Reference	IACA comments to CRD-2 NPA 2010-10
EASA considered this could be effectively regulated by Part-ORO, hence, provisions have been removed from Part-T.	CRD p6: paragraph 18	
The requirements on the operator to verify and regularly assess the compliance of its code-share partner with the applicable ICAO requirements are deemed satisfied by ORO.AOC.115.	CRD p6: paragraph 19	
For the process to verify and regularly assess the compliance of its code-share partner with the applicable ICAO requirements, the operator may rely on other party assessment programmes or certification schemes such as IOSA.	CRD p6: paragraph 21	

Wet lease-in of third-country registered aircraft

Highlights CRD-2 NPA 2010-10	Reference	IACA comments to CRD-2 NPA 2010-10
EASA considered this could be effectively regulated by Part-ORO, hence, provisions have been removed from Part-T. Third country operator can show compliance with Regulation 2042/2003 by using equivalent safety standards.	CRD p6: paragraph 18	

Dry lease-in of third-country registered aircraft

Highlights CRD-2 NPA 2010-10	Reference	IACA comments to CRD-2 NPA 2010-10
Included in amended Part-ORO following comments received. Part-T has been amended to include the related continuing airworthiness requirements.	CRD p7: paragraph 26	



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PART-T

(Continuing airworthiness requirements for third-country registered aircraft operated by EU operators)

Highlights CRD-2 NPA 2010-10	Reference	IACA comments to CRD-2 NPA 2010-10
Aircraft holds a certificate of airworthiness iaw ICAO Annex 8.	CRD p74: T.A.201(1)(d)	
Aircraft complies with any relevant EASA mandatory safety information, including airworthiness directives.	CRD p74: T.A.201(1)(g)(ii)	
Records to be kept: total time in service of the aircraft and life-limited parts, AD-status, maintenance programme compliance status, modification status, repair status.	CRD p74: T.A.201(4)	
Tasks specified in T.A.201 are controlled by an organisation approved iaw Part-M Subpart G (CAMO-T)	CRD p75: T.A.205(1)(a)	
Continuing airworthiness management (CAM) contract	CRD p79-81: Appendix I	
The contracted Part-M Subpart-G (CAMO-T) shall keep the records	CRD p77: T.A.714	
Additional record keeping procedures for competent authorities	CRD p78: T.B.104	
CAMO-T shall contract a qualified maintenance organisation for the maintenance and the release of the aircraft.	CRD p75: T.A.205(1)(b) CRD p84: AMC T.A.205(1)(b)	
A maintenance organisation compliant with ICAO Annex 6 Part I should be considered qualified.	CRD p84, AMC T.A.501	
Maintenance contract: the contracted maintenance organisation may subcontract .	CRD p85, Appendix to AMC T.A.205(1)(b), paragraph 5	
Maintenance contract: supply of components by CAMO or qualified maintenance organisation.	CRD p85, Appendix to AMC T.A.205(1)(b), paragraph 13	
Maintenance contract meetings: contract review, work scope planning meeting, technical meeting and quality meeting.	CRD p85, Appendix to AMC T.A.205(1)(b), paragraph 20	
The operator is responsible for development and amendment maintenance programme.	CRD p75: T.A.301(1)	