

Technical Airworthiness Authority Advisory (TAA Advisory)	
Title	Indirect Recognition of Acceptable Maintenance Organizations
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1. Purpose

- 1.1 This Technical Airworthiness Authority (TAA) Advisory provides guidance to organizations in developing and implementing a process for recognizing Acceptable Maintenance Organization on behalf of the Technical Airworthiness Authority.
- 1.2 According to the Department of National Defence (DND) Technical Airworthiness Manual (TAM) (reference 3.1.1), the TAA is responsible for authorizing contracted maintenance organizations to carry out maintenance support services on behalf of DND. Under specific conditions, the authorizing of a maintenance organization may be accomplished by an abbreviated “Recognition” process versus an otherwise full accreditation process performed exclusively by the TAA. To be “Recognizable”, the contracted organization will need to demonstrate, through a formal assessment process, that it has obtained approval from another TAA-Acceptable Airworthiness Authority (reference 3.1.2) for an equivalent or similar scope to that, as defined in the contract. In addition, an Original Equipment Manufacturer (OEM) may be deemed recognizable providing that it has capabilities (or support arrangements) that satisfy contractual requirements.
- 1.3 Once it has been determined that the organization is recognizable (through contractual requirements), a formal “Recognition” process is initiated. Recognition is achieved when the organization can demonstrate compliance with the TAM, including all relevant rules and standards for the scope and depth of the services provided.

2. Applicability

- 2.1 This TAA Advisory is applicable to TAA-Accredited Organizations wishing to indirectly recognize an OEM or Maintenance Organization (MO) contracted to provide services that have been approved by another civilian/military airworthiness authority recognized by the TAA, to equivalent or similar scope.

3. Related Material

3.1 Regulatory References:

- 3.1.1 C-05-005-001/AG-001 – Technical Airworthiness Manual (TAM)
- 3.1.2 TAA Advisory 2016-04 – Recognition of Airworthiness Authorities
- 3.1.3 AF9000 Procedure TAA09.006-06 –Aerospace Equipment Program Management (AEPM) Support Arrangement Evaluation and Selection Procedure for Acceptable Maintenance Organizations (AMO)

4. Discussion

4.1 Identifying Recognition Candidates - A Maintenance Organization (MO) may be a candidate for indirect recognition by a TAA-accredited organization on behalf of the TAA if the organization meets the following requirements:

- 4.1.1 OEM – An OEM may be a candidate for indirect recognition when the equipment and services defined in the contract can be fully supported. Typically, an organization can demonstrate OEM status by providing a manufacturer's certificate issued by an AA or a Letter of Authorization (LOA) from an OEM holding the manufacturer's certificate. Once the OEM is identified, the recognition assessment (paragraph 4.2) will establish whether the organization has an acceptable airworthiness control system that meets the intent of the DND TAM (reference 3.1.1) for the scope and depth of maintenance defined in the contract. In some cases, the OEM may perform the work directly, or have a support arrangement with an approved AMO/Repair Station.
- 4.1.2 CAA – A MO approved by a Civil Airworthiness Authority (CAA) that has been recognized by the TAA in accordance with reference 3.1.2 may be a candidate for indirect recognition when the organization's civil approvals are equivalent or similar in scope and depth to the equipment and services defined in the contact. Typically, the organization has a relevant CAA-Approved Maintenance Organization Certificate (TCCA) or Repair Station Certificate (FAA or EASA). Once identified, the recognition assessment (paragraph 4.2) will establish whether the organization has an acceptable airworthiness control system which meets the intent of the DND TAM (reference 3.1.1) for the scope and depth of maintenance defined in the contract. In most cases, the civil regulations for an AMO or Repair Station fully meet the intent of the TAM; however, scenarios may exist where the work performed for military organizations are carried out at a different location or facility and civil oversight may be non-existent or limited. In addition, equipment designed for military use may be different in configuration and/or fall outside of the scope of civil approval. The recognition assessment defined in paragraph 4.2 is intended to identify and resolve these potential gaps.
- 4.1.3 MAA – A MO approved by a Military Airworthiness Authority (MAA) that has been recognized by the TAA in accordance with reference 3.1.2 may be a candidate for indirect recognition when the organization's military approvals are equivalent or similar in scope and depth to the equipment and services defined in the contact. Typically, the organization has a relevant MAA-Approved Maintenance Organization/Repair Station Certificate or Letter of Authorization (LOA) which defines the scope and depth of authority. Often, due to the uniqueness/specialization of military equipment, a MAA will try to leverage off of an existing AMO/Repair Station's civil approvals (if applicable), effectively expanding the scope to cover military equipment. As such, care must be taken to assess the organization as civil oversight may not be adequate for the military contractual requirements. Once the MO is identified as a candidate for recognition, the subsequent assessment (paragraph 4.2) will establish whether the organization has an acceptable airworthiness control system which meets the intent of the TAM (reference 3.1.1) for the scope and depth of maintenance defined in the contract.

4.2 Recognition Assessment – Normally, the airworthiness clauses within the contract Statement of Work (SOW) will limit potential bidders to only those that are "recognizable" as defined in paragraph 4.1 above. If there are no bidders that meet the eligibility requirements for recognition, then the TAA will need to be engaged to establish whether there is an alternative TAA-managed Recognition or Accreditation solution. Once potential bidders have been identified, the recognition assessment may be initiated. This involves having the organization complete an airworthiness survey. The survey is

designed to help evaluators gain a full understanding of the organization's capabilities and airworthiness control system. The contractor will be required to answer specific questions and support the answers with governing processes and procedures where available. An acceptable Recognition Survey should cover all the areas listed below as they relate to the scope and depth of work defined in the contract SOW.

- 4.2.1 Have the company provide evidence that they meet the eligibility requirements for recognition by providing the required civil- or military-issued certificates or LOA including associated scope and depth of the approval.
- 4.2.2 Have the company describe the oversight on their organization by the applicable CAA and MAA. This is normally supported by providing evaluators with recent audit reports on the maintenance organization.
- 4.2.3 Have the organization describe the quality system in place. Ideally a registered quality system (i.e., AS 9100, ISO 9001) is optimal; however, there may be cases where the quality system of the organization is homegrown. The organization should be able to provide a quality manual and associated quality policy that describes the quality system management structure, documentation structure, registrar, internal and external audit cycle and coverage, audit schedule and corrective/preventive action management.
- 4.2.4 Have the organization provide a description of the Safety Management System (SMS) (if applicable). Organizations should provide an SMS policy for review if applicable.
- 4.2.5 Have the organization provide the Maintenance Policy Manual or Repair Station Manual (or equivalent).
- 4.2.6 Have the organization identify the accountable executive for the organization. This should be the individual who is responsible for the airworthiness activities being performed within the organization. In TCCA, this is the PRM. FAA and EASA have designated accountable managers.
- 4.2.7 Have the organization describe the authorization control system. This should include, as a minimum:
 - a. a description of the functions and roles that require assignment of authority (i.e., Maintenance Release Authority) and their associated eligibility requirements (i.e., education, job specific training, and experience requirements);
 - b. the assignment of authority process (i.e., OJT, logbooks, assessments, LOAs, Stamps, eSignatures);
 - c. the system for managing and tracking authorizations, including recurrent training;
 - d. authorization records, associated tools and retention requirements; and
 - e. associated governing processes and procedures which should also be provided to evaluators for review.
- 4.2.8 Have the organization describe the facility where the contract work will be carried out. The facility should be associated with the organization's civil or military approval certificate.
- 4.2.9 Have the organization describe the processes for entering into support arrangement with a sub-contracted organization. This should include a description of airworthiness requirements (i.e., CAA approvals, OEM authorization, etc.), an airworthiness control system, quality system requirements, oversight, exchange of data, facilities, etc. Processes should be provided to evaluators for review.

4.2.10 Have the organization describe their calibration control system for tools and test equipment and provide available processes for review.

4.2.11 Have the organization describe how aviation replacement parts and standard commercial parts are controlled within the organization. Available processes should cover documentation requirements, incoming inspections, storage (including shelf-life tracking and batch/lot control), control of non-conforming parts, and airworthiness requirements for procurement and Approved Vendor Lists.

4.2.12 Have the organization describe the conduct of maintenance and related maintenance recording and technical record policies. The description should detail the maintenance recording requirements for the work orders, including certification requirements and associated authorizations. Additionally, the organization should detail how the work order is linked to the customer purchase order and resulting CofC. The record keeping system and documentation requirements should also be described and associated procedures are required for evaluation.

4.2.13 Have the organization describe how approved data is managed within the organization. This should cover how changes to the approved component maintenance manual and/or drawings are managed and controlled, particularly when software or the software configuration changes.

4.2.14 Have the organization describe how airworthiness monitoring is performed within the organization. This includes monitoring of suppliers, OEMs, and other users for airworthiness issues that may impact the equipment or services defined in the contract.

4.3 Recognition Approval – Generally, the survey question in paragraph 4.2 should be related to areas that an OEM or approved AMO / Repair Station will be able to describe and support with the provision of governing procedures. It is the responsibility of the contract Technical Authority's (TA) evaluation team to assess each response and make a determination whether the response is adequate. In some cases, the contract TA may need to request for more information and/or artefacts to be able to decide regarding compliance to the requirement.

4.3.1 Indirect Recognition – Once it has been determined that the contracted maintenance organization is compliant, the Indirect Recognition process can be completed by adding the contracted maintenance organization to the Weapon System Support Network (WSSN) of the contracting organization (i.e., EPM or EPMS) and seeking TAA approval of this addition to the WSSN.

4.3.2 Exceptions – There will be cases where, upon review of the survey, a contracted maintenance organization cannot be deemed fully compliant. In this case, the contract TA can consult with the TAA to determine how the gaps can be met. This may require the potential contracted organization to develop a DND Airworthiness Supplement (DAS) to fill the gaps and usually requires TAA involvement. In this case, a formal recognition vs in-direct recognition could be granted by letter directly from the TAA. If there are significant airworthiness gaps and unique DND requirements in the contract, then a full TAA Accreditation may be required. An example where a full accreditation may be required is for an organization that has a civil approval to perform maintenance (i.e., OEM, AMO or Repair Station) but is being contracted to also assume air operator responsibilities for DND. This would include activities such as maintenance planning and control, aircraft release, aircraft dispatch, or in-service monitoring.

4.5 Oversight Requirements – For straightforward repair and overhaul contracts where the maintenance organization fully meets the requirements, there may be no requirement

for direct oversight and performance can be monitored through incoming inspections and pre-installation failure statistics. For other contracts where significant and complex work is being performed (i.e., major aircraft inspection), some level of on-site audit will need to be established and can be adjusted as confidence and experience is gained with the contractor. The TAA can be engaged for assistance in establishing an audit plan.

- 4.6. Documentation Requirements – The recognition file supporting indirect recognition and changes to the WSSN of the contracting organization should be retained for two years beyond the life of the contract. As a minimum, the file should contain the Contract SOW, survey response, supporting documentation and audit plan/results.
- 4.7. Airworthiness Clause for Recognition – An example of the Airworthiness Clause that can be used for a contract SOW can be found internally, within DND, at RDIMS AEPM Library #1878403. For those who do not have RDIMS access, a copy can be obtained by contacting the OPI of this advisory.
- 4.8. Recognition Survey - An example of a Recognition Survey that can be used to aid in evaluating potential bidders can be found internally, within DND, at RDIMS AEPM Library #1873681. For those who do not have RDIMS access, a copy can be obtained by contacting the OPI of this advisory.