GUIDANCE MATERIAL: ROADMAP FOR PART-145 SMS TRANSITION

Reference Regulation: EU Regulation 2021/1963 (Part-145 SMS Integration) **Transition Period:** May 21, 2024 – May 21, 2025

Introduction

Based on the requirements of EU Regulation 2021/1963, a mandatory Safety Management System (SMS) must be integrated into the existing Part-145 approval framework. This transition shifts the focus from purely reactive compliance (Quality Assurance) to proactive safety management (Hazard Identification and Risk Mitigation).

The transition period begins on **May 21, 2024**, and must be fully completed and approved by the competent authority no later than **May 21, 2025**. Below is the detailed 4-phase implementation roadmap for maintenance organizations.

Phase 1: Gap Analysis, Preparation, and Implementation

This phase is the responsibility of the organization and should commence immediately.

- **Step 1.1: Gap Analysis**
    - The organization must conduct a comprehensive Gap Analysis comparing their existing Quality System against the new Part-145 SMS requirements (Section A of EU 2021/1963).
    - Identify missing procedures, reporting lines, and required resources.
- **Step 1.2: Nomination of Key Personnel**
    - **Accountable Manager:** Must formally sign a new Safety Policy committing to a "Just Culture" and the provision of necessary resources.
    - **Safety Manager:** Nominate a qualified individual responsible for the daily administration of the SMS. Depending on the size of the organization, this role may be combined with the Compliance Monitoring Manager (Quality Manager), provided independence is maintained.
- **Step 1.3: MOE Revision**
    - The Maintenance Organisation Exposition (MOE) must be completely revised to integrate SMS processes.

- Special focus must be placed on developing procedures for: Hazard Identification, Safety Risk Assessment and Mitigation, Internal Safety Reporting, and Management of Change.

- **Step 1.4: SMS Training Programme**
  - The organization must develop and conduct SMS training for all staff.
  - Training must be tailored to the individual's role (e.g., awareness training for mechanics on how to report hazards, and advanced risk-matrix training for management).

Phase 2: Application for 'Transition Change'

The organization must formally initiate the approval process well in advance of the deadline.

- **Step 2.1: The Submission Package**
  - The organization must formally apply to the competent authority for the approval of a "Transition Change."
  - The submission package must include:
    1. Formal Application Form (e.g., AIR-FRM-002 / AIR-FRM-011).
    2. Nomination documentation for the proposed Safety Manager, which must include their detailed CV, proof of relevant aviation experience, and certificates for SMS and Human Factors training (to facilitate the competent authority's assessment and mandatory interview).
    3. The completed Gap Analysis and the SMS Implementation Plan.
    4. The revised draft of the MOE (where the Safety Manager is formally nominated, specifically highlighting SMS and Compliance Monitoring updates).

Phase 3: Authority Assessment and Corrective Actions

During this phase, the competent authority evaluates the organization's readiness.

- **Step 3.1: Desktop Documentation Review**

- The competent authority will review the submitted MOE draft and the Implementation Plan to verify theoretical compliance with Part-145 SMS requirements.

- **Step 3.2: On-Site Assessment and Interviews**
  - The authority will perform a comprehensive management system assessment on-site using the SMS Assessment Tool.
  - This includes mandatory interviews with the Accountable Manager, the newly nominated Safety Manager, and a sample of maintenance staff to verify their practical understanding of the Just Culture and hazard reporting.
- **Step 3.3: Managing 'Transition Findings'**
  - If non-compliances are identified (e.g., weak risk assessment procedures, inadequate safety training), the authority will raise official "Transition Findings."
  - The organization must perform a Root Cause Analysis (RCA) and implement a Corrective Action Plan (CAP) within the timeframe granted by the inspector.

Phase 4: Final Approval and Continuous Monitoring

The final formalization of the SMS integration.

- **Step 4.1: Closure and Formal Approval**
  - Once all Transition Findings are successfully closed and the authority is satisfied with the corrective actions, formal approval is granted.
  - The authority will officially approve the Safety Manager and approve the new MOE amendment.
- **Step 4.2: Post-Transition / Continuous Improvement**
  - Following approval, the organization enters the continuous monitoring phase. The Safety Manager must begin tracking Safety Performance Indicators (SPIs) and evaluating the effectiveness of the implemented risk mitigations.

CRITICAL DEADLINE: The organization must achieve this fully approved status and complete all four phases by **May 21, 2025**. Failure to do so will result in the suspension or limitation of the Part-145 approval.

APPENDIX: The **new requirements** introduced by Regulation 2021/1963

Potential transition findings are identified in yellow/Editorial changes not requiring dedicated transition finding (or to be covered by MOE, 145.A.70) are identified in blue		
Part-145 requirement	**Changes in 'new Part-145'**	**Impact analysis**
145.A.10 - Scope	No change in the requirement text	Potential adjustment only if there are changes in the AMCs/GMs
145.A.15 Application for an organisation certificate	Previous title 'Application' (a) to account for applicable Part-M and Part-ML requirements (b) extra requirements for applicants for an initial certificate	Refer to the list of Part-M and Part-ML requirements that needs to be addressed in the MOE/procedures. Despite the new wording the organisation is expected to comply with this requirement before the transition. From 2 December 2022, organisations pursuing an initial certificate shall provide to the competent authority the results of a **pre-audit performed by the organisation** against applicable requirements Part-M, Part-ML and 'new Part-145'.
145.A.20 Terms of approval and scope of work	Previous title "Terms of approval" Scope of work in accordance with *145.A.70* Terms of approval attached to the organisation certificate issued by the competent authority	Check changes in 145.A.70 No transition finding foreseen
145.A.25 Facility requirements	No change	No impact
145.A.30 Personnel requirements	(a) Requirement for 'accountable manager' is reworded with potential impact on the description of responsibilities in the MOE. (b) Nominated person of group of persons representing the management structure (c) compliance monitoring instead of quality system (ca) new position **'Safety manager'** (cb) existing requirement (cc) existing requirement (d) re-wording with low impact on compliance (e) re-wording to account for 'safety management and compliance monitoring', **addition of competency to include an understanding of safety management principles**. (f) to (i) no change (j) extended to cover support staff for base maintenance (j)(1) and other re-wording with low impact on compliance (k) airworthiness review under Part-ML reference to *145.A.37*	Potential transition finding. Accountable manager has a basic understanding of this Regulation (expected to cover 2018/1139 and 1321/2014), in particular new responsibilities to establish and promote safety policy (reference to *145.a.200(a)(2)*). Nominate safety manager and compliance monitoring manager (reusing as possible and desired the quality system function) **(ca): Person responsible for the safety management processes ('safety manager') is subject to approval of the competent authority pursuant article 145.A.85(a)(2).** Nominated person or group of persons demonstrate a working knowledge of the changes in 1321/2014 as per this amendment and changes in the new MOE/procedures Procedure to change nominated persons may remove the use of the 'EASA Form 4' that is no longer necessary **(e): Organisation to establish and control the competency of the safety manager as well as to include in the competence for all personnel an understanding of the application of safety management principles.** Procedure for airworthiness review under reference to new number *145.A.37*

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Part-145 requirement	**Changes in 'new Part-145'**	**Impact analysis**
145.A.35 Certifying staff and support staff	(a) to (c) no change (d) to (f) re-wording to emphasize up-to-date knowledge based on recurrent training and to include safety management (g) and (h) no change (i) reworded to account for nominated group of persons instead of single person Former (j) requirement to maintain a record of all certifying and support staff is covered by new 145.A.55(d). All subsequent requirements are changing letter and 145.A.35 (o) is removed	Training on safety management that can be accomplished through 145.A.30
145.A.36 Records of airworthiness review staff is removed	Refer to 145.A.55(d)	
145.A.37 Airworthiness review staff	Introduced as new number but the content is equivalent to former 145.A.30(k)	Editorial changes to the MOE and the procedures may be needed due to new numbering Eligibility criteria for sailplanes and balloons are relaxed Requirement removed for AR staff to be independent from the continuing airworthiness management process of the aircraft being reviewed
145.A.40 Equipment and tools	No change	
145.A.42 Components	No change	
145.A.45 Maintenance data	(a) Editorial change including change of reference (old 145.A.55(c) equivalent to 145.A.55(a)(3) (b) No change (c) Detected inaccurate, incomplete or ambiguous maintenance is also recorded as part of the internal safety reporting scheme (referred to in point 145.A.202) (d) editorial (e) added that also long maintenance tasks shall be transcribed onto the work cards or worksheets	Potential transition finding. This can be alternatively covered by a transition finding against 145.A.202 In case of non-compliance with paragraph 145.A.45(c) in respect to notification to the author an oversight finding should be raised
145.A.47 Production planning	(a) no change (b) planning shall take into account the human performance, including the threat of fatigue, as part of the management system (c) no change (d) new: The organisation shall ensure that aviation safety hazards associated with external working teams carrying out maintenance at the organisation's facilities are considered by the organisation's management system.'	Potential transition finding. This can be alternatively covered by a transition finding against management system. The organisation should amend current exposition and procedures to account for the changes in this requirement
145.A.48 Performance of maintenance	(a) containing former 145.A.80 (b) new: The organisation shall be responsible for the maintenance that is performed within the scope of its approval. (c) (1) to (4) are covering former 145 (a) to (d)	Despite the new points and numbers, there are not potential transition findings with the changes. In case of non-compliance with 145.A.48, an oversight finding should be raised Editorial updates to the MOE and the procedures may be needed due to the changes

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Part-145 requirement	**Changes in 'new Part-145'**	**Impact analysis**
	(c) (5) new: referring to M(L).A.403(b) for assessment of aircraft defects	
145.A.50 Certification of maintenance	(a) change to emphasize that the verification is performed by the certifying staff issuing the CRS (b) no change (c) 'aircraft operator' is replaced by 'person or organisation responsible for the aircraft continuing airworthiness' (d) change to clarify that CRS is issued by appropriately authorised certifying staff on behalf of the organisation. 'required maintenance' is replaced by 'maintenance that was ordered' (g) no change (f) editorial changes	Despite the new wording, no potential transition finding is expected in regards to compliance with the revised 145.A.50
145.A.55 Record-keeping	Previous title: 'Maintenance and airworthiness review records' (a) Maintenance records: (a)(1) previously (a), (a)(2) previously (b), (a)(3) previously (c), (a)(4) previously (c)(3) (b) Airworthiness review records: (b)(1) previously under (a), (b)(2) previously under (c), (b)(3) previously under (c)(3) (c) **New**: Management system, contracting and subcontracting records (d) Personnel records: (1)(i) **new**, (1)(ii) and (2) previously under 145.A.36, (3) previously 145.A.35(j), (4) only partially covered, (5) previously under 145.A.36 and 145.A.35(j) (e) New establishing the need of a record-keeping system (f) New establishing the need to document the format of the records (g) Previously under (c)(1) and (2)	Potential transition finding of non-compliance with 145.A.55(c) or (d)(1)(i). This can be alternatively covered by a transition finding against 145.A.200 and 145.A.205 Potential transition finding of non-compliance with 145.A.55(e) and/or (f) Editorial updates to the MOE and the procedures may be needed due to the changes in references
145.A.60 Occurrence reporting	(a) **New:** establishing occurrence reporting as part of the management system and in compliance with regulations EU) No 376/2014 and (EU) 2018/1139. Previously partially covered. (b) reworded but previously under 145.A.60(a) (c) **New**: reporting such events to the person or organisation that is responsible for the continuing airworthiness of that aircraft (d) **new**: establishing the requirements for organisations that do not have their principal place of business in a Member State, establishing both initial mandatory reports and, where relevant, a follow-up report	Potential transition finding of non-compliance with 145.A.60(a). This can be alternatively covered by a transition finding against 145.A.200 Potential transition finding of non-compliance with 145.A.60(c) or (d) as applicable In case of non-compliance with aspects covered previously by former 145.A.60 an oversight finding should be raised.
145.A.65 Maintenance procedures	Previous title: 'Safety and quality policy, maintenance procedures and quality system'	Editorial updates to the MOE and the procedures may be needed due to the changes in references

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Part-145 requirement	**Changes in 'new Part-145'**	**Impact analysis**
	(a) safety and quality policy moved to 145.A.200(a)(2). reworded but previously under (b) (b) previously under (b)(1) and (b)(2) Former (c) related to quality system moved to requirement 145.A.200(ja)(6)	
145.A.70 Maintenance organisation exposition (MOE)	(a)(1) no change (a)(2) **New: safety policy and the related safety objectives** (a)(3) to (5) include person(s) nominated under points 145.A.30 (c) and **new** (ca) and their responsibilities, organisation chart (a)(6) 'scope of approval' replaced by 'scope of authorisation' (a)(7) now including the system that is in place to plan the availability of staff (a)(8) facilities covering all approved locations (a)(9) added link to point 145.A.20 (a)(10) procedure that sets out the scope of changes not requiring prior approval including notification (a)(11) editorial change (a)(12) generalised to the procedures specifying how the organisation ensures compliance with this Annex (a)(13) added 'regular' to aircraft maintenance services (a)(14) no change (a)(15) generalised to all approved locations (a)(16) no change (a)(17) **New:** the list of the currently approved alternative means of compliance used by the organisation (b) and (c): (b) is reviewed to specify that the initial MOE is subject to competent authority approval. MOE update and approval process managed as per points (a)(10) and (a)(11). Changes listed in point 145.A.85(a) shall be approved by the competent authority. **New**: Organisation shall develop a procedure to comply with (c), where previously the 'indirect approval procedure' was optionally ('may').	Potential transition finding of non-compliance with 145.A.70. The organisation should amend current exposition to account for all changes, requiring to address at least: • the statement signed by the accountable manager confirming work in accordance with the new Annex II as amended by 2021/1963 • the safety policy (a)(2) • person(s) nominated under points 145.A.30 (c) and (ca) and their duties and responsibilities • new organisation chart • a general description of how the organisation ensures availability of staff (a)(7) • procedure defining the scope of changes not requiring prior approval and describing how such changes will be managed and notified (a)(10) and (11) • list of the approved locations and not only line stations in (a)(15) • list of the currently approved alternative means of compliance used by the organisation in (a)(17) MOE amendment for compliance with (a)(3), (a)(5), (10), (a)(11), (a)(17) and (c) has to be approved by the competent authority. In case the organisation already has an approved procedure for 'indirect approval', this continues to be applicable unless the NCA determined that the procedure is not meeting the requirements for the procedure changes not requiring prior approval. MOE amendment for other changes for compliance with new Part-145 procedures may be in scope of changes not requiring prior approval. Potential transition finding of non-compliance with 145.A.70(c).
145.A.75 Privileges of the organisation	(a) and (b) editorial changes (c) to (e): no change	No impact except (f) is not eligible to foreign Part-145 organisations.

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Part-145 requirement	**Changes in 'new Part-145'**	**Impact analysis**
	(f): point is only applicable to organisations with its principal place of business in one of the Member States.	
145.A.80 deleted. The text is moved to 145.A.48 (a)	Editorial updates to the MOE and the procedures may be needed due to remove references to 145.A.80	
145.A.85 Changes to the organisation	Content is mostly **new** with the following main changes: (a) establishing a list of changes that require prior approval by the competent authority. (b) establishing the process for changes that require prior approval by the competent authority (c) establishing the process for changes that do not require prior approval by the competent authority	Potential transition finding of non-compliance with 145.A.85 As soon as the corresponding MOE procedures of 145.A.70(a)(10), (a)(11) and (c) are
145.A.90 Continued validity	(a)(1)to(3) editorial changes and adding compliance with Regulation (EU) 2018/1139. References to 145.B.350 and 145.A.140 (b): added 'without delay'	In case of non-compliance, an oversight finding should be raised Editorial updates to the MOE and the procedures may be needed to update relevant cross references.
145.A.95 Findings and observations	(a) Previously covered by 145.a.95(c). Added reference to point 145.B.350. (a)(1) **new** addressing the need to identify the root cause(s) of, and contributing factor(s) to, the non-compliance. (a)(2) and (a)(3) previously covered by 145.a.95(c). **New** It should be noted that the corrective action & implementation plan is subject to assessment and acceptance of the competent authority pursuant point 145.B.350(d). (b) **new** regarding the period agreed with that competent authority for the actions (c) **new** addressing the need to give due consideration to the observations in accordance with point 145.B.350(f)	Potential transition finding of non-compliance with 145.A.95. (a)(2) would require the organisation to establish and implement procedures to submit the corrective action plan within the time frame granted and obtaining the acceptance of the competent authority In case of non-compliance with aspects covered previously by former 145.A.60 an oversight finding should be raised.
145.A.120 Means of compliance	New point establishing the criteria to use alternative means of compliance to establish compliance with this Regulation	Potential transition finding, if the organisation wishes to use an alternative means of compliance, is not needed as far as privilege is not exercised. A Procedure for alternative means of compliance that is acceptable to the competent authority is needed.
145.A.140 Access	Access to any facility covered by 145.A.90(a)(2), but now extended to any aircraft, document, records, data, procedures or to any other material and both to the competent authority defined in point 145.1 and to the authority performing the oversight tasks in accordance with point 145.B.300(d).	Even if partially newly introduced, this requirement is not considered as a novelty and no potential transition finding is expected regarding this requirement. In case of non-compliance, an oversight finding should be raised. Editorial updates to the MOE and the procedures to update the relevant cross references.
145.A.155 Immediate reaction to a safety problem	145.A.155 add a new requirement to implement any safety measures mandated by the competent authority and any relevant mandatory safety information issued by the Agency.	Even if newly formally introduced through CAMO.A.155, this requirement is not considered as a novelty and apart from the case of the exposition update to account for that new article (refer to potential transition

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Part-145 requirement	**Changes in 'new Part-145'**	**Impact analysis**
145.A.200 Management system	Requirement introducing novelties (a)(1) and (a)(2) was previously 145.A.65(a) (a)(6) was previously 145.A.65(c) (b) is new (c) is new but could already be in place	Potential transition finding. The organisation should amend current exposition quality system procedure to account for 145.A.200 and 145.A.202. Main novelties are: • 145.A.200(a)(2): Safety policy and related safety objectives. • 145.A.200(a)(3): identification of aviation safety hazards and management of associated risks. • 145.A.200(a)(4): safety promotion • 145.A.200(a)(5): documentation of all management system key processes. This is considered the main novelty of the regulation. As part of the transition of an organisation, the competent authority should assess the organisation's management system and processes to make sure that all the required enablers of a functioning management system are present and suitable. In case of non-compliance with 145.A.200(a)(1)/(a)(4)/(a)(6) an oversight finding should be raised
145.A.202 Internal safety reporting scheme	Previously partly under 145.A.60(b). A new 145.A.202 Internal safety reporting scheme is added to establish an internal reporting scheme supporting the organisation's hazard identification and safety risk management processes and fostering its safety culture	Potential transition finding. The internal reporting scheme shall also be accessible to organisations (i.e. sub-contractors) working under the management system. It also forms the basis for establishing mandatory and voluntary occurrence reporting as required by Regulation (EU) No 376/2014. The organisation should amend its procedures to account for 145.A.202
145.A.205 Contracting and subcontracting	A new 145.A.205 Contracting and subcontracting is added to clarify the responsibility of the Part-145 organisation to ensure that any contracting or subcontracting complies with applicable requirements. Note that provisions for subcontracting where previously in AMC 145.A.75(b).	Potential transition finding. The organisation should amend current exposition to account for 145.A.205. In case of non-compliance with previous existing requirements (e.g. 145.A.75(b)), an oversight finding should be raised