Summary of Regulations Concerning Aviation Maintenance Records
EASA & FAA

Owners & Operators

EASA Regulations, Part M, covers maintenance of aircraft and recordkeeping requirements.

- Owners & Operators (FAA and EASA)
  - EASA: See, AMC/GM, Continuing Airworthiness Requirements, Part M
    - Section A, Subpart C, M.A. 305 et seq.

Applies to aircraft registered in an EU Member State, or in a third country, but used by an operator for which a Member State ensures oversight of operations.

Owners are responsible for compliance except for leased aircraft, in which case, the lessee is responsible for compliance; although Owners/Lessees may contract with approved MOs (Maintenance Organizations) for the MOs to be responsible for maintenance task compliance.

Owners/Lessees are ultimately responsible for airworthiness of its aircraft.

The completion of all aircraft maintenance must be recorded on a “certificate of release” and kept as a maintenance record.

Records shall include: logbooks for aircraft, engines, and life limited components; and operator’s daily log books.

An aircraft’s continuing airworthiness shall be proven by records

- Status of AD compliance
- Status of ongoing mods and repairs
- Status of compliance with Mx program
- Status of service life limited components
- Mass & Balance reports
- List of Deferred maintenance

Records for Engines and Life limited components shall include:

- Component ID
- Type, serial number and registration
- Service date, and accumulated flight time, cycles, calendar time as appropriate

Records must be clear and legible, and corrections must show the corrected original entry.
Owner/Operator must have a recordkeeping system that maintains records for the following periods:

- All Mx records for the aircraft and any life limited parts must be kept until underlying work is superseded, but not less than 36 months.
- Total time in service for life limited parts for at least 12 months AFTER the aircraft or component has been withdrawn from service.
- Current status of compliance with Mx program until underlying work is superseded.
- Current status of AD compliance for at least 12 months AFTER the aircraft or component has been withdrawn from service.
- Details of Mods & Repairs for at least 12 months AFTER the aircraft, engine, or component has been withdrawn from service.

When aircraft are transferred from one owner or operator to another, all required records must follow the aircraft, and new owner or operator must retain records for required periods.

**MROs**

MROs must keep Mx records given to operators for 3 years rather than 2 as in US.

- **MROs**
  - FAA: See, 14 CFR § 145.219
  - EASA: See, AMC/GM, Continuing Airworthiness Req’ts, Part M Section A, Subpart F, M.A. 614 et seq.

All required records of the Owner, Operator or MRO must be kept in a manner that prevents damage, alteration, loss or theft.

- **Paper vs. Electronic Systems**
  - FAA: Advisory Circular 120-78
  - EASA: See, AMC/GM, Continuing Airworthiness Req’ts, Part M Section A, Subpart C, M.A. 305(h), and Subpart F, M.A. 614a

If kept in digital form:

- At least one complete backup copy of all records must be stored in a different location, and in an environment that prevents damage, alteration, loss or theft.
- Backup must be made within 24 hours of the performance of the underlying maintenance.
- Each computer terminal where the records may be accessed must have program safeguards against records alteration by unauthorized personnel.

When an MRO ceases operations, all records for the last 3 years of operation must be distributed to the last owner or customer.

Primary objective is to have secure and easily retrievable records with comprehensive and legible contents throughout the required retention period.
FAA Advisory Circular 120-78

- Sets forth guidance (not mandatory) on the acceptable use of Electronic Mx Recordkeeping Systems (EMRS) and Electronic Signatures, and has enabled the evolution of aviation Mx e-recordkeeping
- Also provides guidance on the acceptability of electronic recordkeeping systems and electronic maintenance manuals, including inspection procedures manuals, quality assurance, operations manuals, and training manuals required by Title 14 of the Code of Federal Regulations (14 CFR)
- After FAA approves an EMRS, it may be used to generate and store aircraft Mx records

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